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Final Environmental Impact Statement for Revision of the Inyo National Forest Land Management Plan

Volume 3: Responses to Public Comments on the Draft Environmental Impact Statement

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Cover Photo: Looking down Lundy Canyon at a beaver pond. Photo by Leeann Murphy.

Contents

Project Background **1**

Content Analysis Process **1**
List of Comments and Commenters 2

Issue Statements and Responses **2**
Air Quality and Water Resources 2
Air Quality 2
Water Resources 7
Inyo-specific Issues 14
Partnerships 14
Forest Products 19
Fire and Smoke Management 23
Recreation 25
Tribal Comments 31
Inyo County Specific Comments 35
Mono County Specific Comments 37
Alternatives 52
Process and Public Comments 56
Management Areas 57
National Environmental Policy Act Process 59
Purpose and Need 75
Multiple Use 78
Range of Alternatives/Alternative Suggestions 83
Alternative A 93
Alternative B 95
Alternative C 97
Alternative D 101
Best Available Scientific Information 102
Partnerships 105
Forest Plans 116
Planning Rule 130
Outside the Scope 136
Monitoring 141
Cooperating Agencies 148
Social Issues 148
General 148
Public Involvement 151
Tribal/Cultural/Heritage 154
Travel Management 162
Facilities and Roads 162
Geology, Mining, Minerals and Energy 168
Lands and Special Uses 171
Inventoried Roadless Areas 175
Range, Meadow, and Aquatic Resources 177
Range and Grazing 177
Aquatic and Riparian Resources 206
Terrestrial Vegetation and Fire 238
Wildlife and Botany 341
Wilderness, including Evaluation Process 423

Wild and Scenic Rivers, including Evaluation Process 460
Inventoried Roadless Areas 472
Pacific Crest National Scenic Trail 472
Motorized Recreation 490
Mountain Biking and Mechanized Recreation 505
Recreation Access 511
General Recreation 513
Winter Recreation Opportunity Spectrum 540

Project Background

The Forest Service initiated revision of the Sierra, Sequoia, and Inyo National Forest land and resource management plans as a joint effort in 2011. The Notice of Intent outlining our detailed proposed actions for revising the Inyo, Sequoia and Sierra forest plans was published in August 2014, with a 30-day comment period. The Forest Service released a combined draft environmental impact statement for the three national forests and three separate land management plans (one for each) in May 2016 and launched a 90-day formal comment period on the documents. Additional public involvement opportunities took place throughout the plan revision process, including public engagement regarding species of conservation concern, wilderness inventory, wild and scenic rivers study, and the monitoring program. In response to comments received and changed conditions due to tree mortality on the Sierra and Sequoia National Forests, the Forest Service decided in March 2017 to separate the Inyo National Forest land management plan revision from the revision of the Sierra and Sequoia National Forests. The Inyo National Forest proceeded to develop its final environmental impact statement, while the Sierra and Sequoia are preparing a revised draft environmental impact statement for an additional comment period. This document contains the draft environmental impact statement comment content analysis and response process for the Inyo National Forest.

Content Analysis Process

The draft environmental impact statement comment period opened on Friday, May 27, 2016 and closed on Monday, August 29, 2016, to provide a total of 95 days for comments to be submitted. The Inyo National Forests enlisted the assistance of the Forest Service Enterprise Program to manage comment letters within the Comment Analysis and Response Application (CARA). Comments were received via fax, the CARA web based comment form, U.S. Postal Service, email, and hand deliveries. Enterprise employees entered all of the comment letters on the draft environmental impact statement into CARA. CARA automatically assigned each letter a unique number (see Appendix A).

During the comment period, a total of 32,837 letters were received. Of these letters, 900 that were received were designated as unique letters and 2,980 were designated as duplicate submissions. Twenty-nine sets of form letters were received, reflecting a total of 28,982 form letters received.

An interdisciplinary planning team reviewed each unique and master form letter, and identified individual comments within each letter. The team identified a total of 4,854 comments and assigned each comment a subject code, in a process referred to as coding. All coding occurred within CARA. During the coding process, CARA assigns a unique number to each comment identified by the team. This comment number consists of the letter number, a dash, and sequential comment numbers (for example, 32759-3 would indicate that the comment is the third comment within the letter with the unique identifier 32759).

The same interdisciplinary planning team reviewed coded comments, grouped like comments, and wrote issue statements to capture the essence of all similar comments. These issue statements were assigned to specialists on the interdisciplinary team according to their specialty, and the specialist wrote responses. In the process of this issue review and response writing process, the interdisciplinary team tracked updates and changes identified by commenters for the environmental impact statement and forest plan. Strategies were developed to address these issues

brought up by the commenters. One such change that was made was the addition of alternative B-modified to the final environmental impact statement. For a summary of all changes made between the draft and final environmental impact statements, see the record of decision. A list of comments assigned to each issue is available in the project record.

List of Comments and Commenters

The list of comments and commenters on the draft environmental impact statement is available on the project website at: (https://www.fs.usda.gov/main/inyo/landmanagement/planning). The list includes the commenter name, organization name, letter number, and type of letter or comment received (unique letter, form letter, email, etc.).

Issue Statements and Responses

Each issue statement was assigned a unique tracking number by the interdisciplinary team. As the team responded to the issue statements, they combined duplicate or very similar statements which resulted in gaps and arrangement in the numbering sequencer. Also, occasionally an issue statement was found that related to another issue statement and was moved closer in the document to the related issue statement, resulting in some tracking numbers being out of sequential order. All original comments and tracking numbers are available upon request from the planning record.

Air Quality and Water Resources

Air Quality

1001

All alternatives increase smoke and impact health. There needs to be a balance of forest and human health. There must be an analysis of the public health ramifications comparing recent fire emission outputs and the proposed active fire program. Smoke from ecological fires (fire functioning under the normal fire regime and fire frequency) can promote forest resilience while mitigating long-term health effects from mega-fire emissions.

Response: The balance between forest and human health was analyzed qualitatively in the final environmental impact statement. The analysis approach compared the tradeoffs between potential smoke emissions from the restoration treatments that reduce the potential wildfire emissions and the wildfire emissions that would occur without the treatments. The indicator for smoke effects on air quality for all alternatives analyses is human health impacts. Alternatives B, C and D analyze treatments to increase forest resilience and help establish a normal fire regime. Alternative A represents current management and resulting emissions from future mega-fire emissions.

Treatments will reduce forest emissions by mitigating the potential for catastrophic fires with prescribed and managed natural ignitions fire. While conducting these treatments, the agency is required to meet all air quality regulations, including federal, state and local air pollution control district rules (final environmental impact statement, chapter 3, “Air Quality,” Affected Environment and Environmental Consequences). Research indicates that prescribed burning, such as the treatments analyzed in the draft environmental impact statement, results in an 18 to 25 percent reduction in wildfire emissions, with examples as high as 60 percent (Wiedinmyer and

Hurteau 2010), (final environmental impact statement, chapter 3, "Air Quality," Affected Environment and Environmental Consequences). The draft environmental impact statement modelled long-term emissions with baseline management and long-term emissions from implementation restoration treatments (Hurteau et al. 2014).

Further detail of implementation emissions will be analyzed at the project level prior to implementation. In addition, wildfire emissions are thought to be widely underestimated and further research is needed to accurately model wildfire smoke emissions (Lui et al. 2017), (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences).

1002

Air Quality and Smoke Management.

The Inyo National Forest plan should include strong and actionable language to work with agencies on the west side on smoke management. The plans for the Sierra and Sequoia National Forests should also contain language to manage smoke and the impacts to downwind areas in their strategies.

Response: The final environmental impact statement addresses smoke impacts for all alternatives considered. The federal Clean Air Act and California's Title 17 require smoke management. Federal agencies, such as the Forest Service, must meet all regulations put forth at each level of government, including federal, state, and local air pollution control district rules (final environmental impact statement, chapter 3, "Air Quality," Affected Environment and Environmental Consequences). Local air districts consider weather conditions before authorizing prescribed fire activities. Daily statewide conference calls and the prescribed fire incident reporting system (PFIRS) facilitate collaboration and communication across air quality jurisdictions.

1003

Plan needs to address specific requirements for collaboration (coordination with neighboring burning forests), wind and weather when planning and implementing specific prescribed fire projects. Trans-Sierran smoke transport must be evaluated.

Response: Federal agencies, such as the Forest Service, must meet all regulations for air quality put forth at each level including Federal, State, and local air pollution control district rules (final environmental impact statement, chapter 3, "Air Quality," Affected Environment and Environmental Consequences). Local air districts consider weather conditions before authorizing prescribed fire activities. Daily statewide conference calls and the prescribed fire incident reporting system (PFIRS) facilitate collaboration and communication across air quality jurisdictions. Further emissions analysis occurs at the project planning level, including specific smoke transport, such as Trans-Sierran impacts.

1004

The draft environmental impact statement should disclose the fact that fire is a primary restoration option in wilderness and is promoted there for maintaining ecosystem sustainability and ecosystem integrity (36 CFR section 219.8, section 219.9). Ecological fire use emissions in these Class I areas should be treated as natural background

conditions (Schweizer and Cisneros 2016, Stephens et al. 2007) and should be exempted for visibility maintenance requirements in the Regional Haze Rule.

Response: The draft environmental impact statement recognizes that fire is a restoration option in wilderness and other lands for promoting ecosystem sustainability and integrity. The Regional Haze Rule of 1999 requires the Forest Service to monitor air quality in class I airsheds (wilderness areas). The goal of this law is to return haze levels to natural background conditions by the year 2064 (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences). Air quality is regulated at three levels: federal, state, and local air pollution control districts. Federal agencies, such as the Forest Service, must meet all regulations put forth at each level, including the Regional Haze Rule (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

1005

Air quality due to prescribed burning as compared to wildfire is not sufficiently addressed.

Response: The final environmental impact statement addresses changes in air quality for both prescribed burning and wildfire. The alternatives are directly compared to each other (final environmental impact statement, chapter 3, Air Quality, Environmental Consequences). The action alternatives analyze treatments to increase forest resilience and help establish a normal fire regime at varying levels with varying methods. Alternative A represents current management and resulting emissions from future mega-fire emissions.

Research indicates that prescribed burning results in an 18 to 25 percent reduction in wildfire emissions, with examples as high as 60 percent (Wiedinmyer and Hurteau 2010). Thinning can result in substantially lower emissions during large wildfires (Hurteau and North 2009), and local examples indicate emissions can be lowered by as much as 90 percent or more (Hurteau, Koch, and Hungate 2008), (final environmental impact statement, chapter 3, Air Quality, Assumptions).

Long-term reductions in emissions from implementation of restoration activities as well as increasing catastrophic wildfires frequency due to no change in current management were modeled by Hurteau et al. in 2014 (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences). In addition, further details of prescribed fire emissions will be analyzed at the project level before implementation occurs. Conversely, current research indicates that wildfire emissions may be widely underestimated. Further research is needed to accurately model wildfire smoke emissions (Lui et al. 2017).

1006

The air quality impacts analysis in the draft environmental impact statement lacks an accurate assessment of smoke impacts due to major changes in the baseline Alternative A forest environment and last reported emissions data from 2013 that has not accounted for the massive level of tree mortality impacting a significant level of tree species in table 1, p. 2, Smoke and Air Quality Report (Nick 2016), a supplemental report in the project record.

Response: It is unknown exactly, when, where or how much wildfire will occur but the trend of increasing large wildfires and associated high smoke emissions is expected to continue (Hurteau et al. 2014). In addition, wildfire emissions are thought to be widely underestimated (Lui et al. 2017). The current tree mortality rates are unprecedented in scope and emissions consequences

are unknown and have not been quantified. Further research is needed to accurately model wildfire smoke emissions (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

1007

Restrictions on tree size and harvesting in the alternatives prevent adequately thinning the forest to prevent massive wildfires, causing violation of air quality standards, as well as negative impacts to watersheds and water quality from soil erosion and sterilization. Massive fires also result in negative impacts to recreation opportunities and facilities. The planned level of vegetation treatment in alternative B is inadequate to adequately improve forest health.

Response: The final plan limits harvest with certain exceptions to trees less than 30 inches in diameter (TERR-FW-STD-01). The establishment of diameter limits encourages the harvest and removal of smaller diameter trees, which reduces overall fuel loads and ladder fuels. The larger trees are more fire-resilient than smaller trees and serve to create desired conditions.

1008

Draft environmental impact statement is lacking analysis of air quality emissions in terms of balance between current and proposed levels of prescribed burning and managed wildfires, and whether these are less than or greater than air pollution from large-scale, high-intensity wildfires.

Response: The final environmental impact statement addresses changes in air quality for both prescribed burning and wildfire. The potential indicator for smoke effects on air quality was measured quantitatively. Emissions produced by alternative A serve as a baseline to compare emissions produced by actions under alternatives B, C and D. The pollutants analyzed are the criteria pollutants of total organic gases (TOG), reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM), particulate matter less than 10 micrometers (PM10) and particulate matter less than 2.5 micrometers (PM2.5). The draft environmental impact statement addresses long-term, indirect and cumulative effects from implementation is analyzed using modeled future emissions from Hurteau et al. (2014) (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

The final environmental impact statement acknowledges that emissions from wildfires are generally much larger than prescribed fire (Vaillant, Reiner and Noonan-Wright 2013) (Lui et al. 2017) In addition, wildfire emissions are thought to be widely underestimated (Lui et al. 2017). Current research indicates emissions from restoration treatments can result in substantially lower emissions during large wildfires (Hurteau and North 2009) and local examples indicate by as much as 90 percent or more (Hurteau, Koch, and Hungate 2008) (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

1009

Long-term versus short-term tradeoffs are not analyzed in reference to air quality, including visitation and health effects.

Response: The Clean Air Act is the regulatory statue that protects human health in regards to air quality. The draft environmental impact statement addresses long-term versus short-term health effects related to air quality by quantitatively analyzing the criteria pollutants as defined by the Clean Air Act. Emissions produced by alternative A serve as a baseline to compare emissions

produced by actions under alternatives B, C and D. The pollutants analyzed are the criteria pollutants of total organic gases (TOG), reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM), particulate matter less than 10 micrometers (PM10) and particulate matter less than 2.5 micrometers (PM2.5). Long-term, indirect and cumulative effects from implementation are analyzed using modeled future emissions from Hurteau et al. (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

The final environmental impact statement acknowledges that there is an economic contribution provided by recreation to both local communities through visitation and to recreational users. Impacts to visitation were analyzed under “smoke effects to recreation” for all alternatives considered. The effects from smoke to scenic vistas that visitors to wilderness enjoy were analyzed in each alternative under the indicator for smoke effects to visibility in class I airsheds (wilderness)” (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

1010

"Smoke and Air Quality - Analysis Methodology Report" does not address anything beyond particulates. What about health hazards of toxins?

Response: The draft environmental impact statement did not analyze toxins as it is beyond the scope of this analysis. The Clean Air Act regulates toxic or hazardous air pollutants under the National Emissions Standards for Hazardous Air Pollutants (NESHAP). These standards are set for certain categories of industrial sources of air pollution and are not applicable to prescribed fire or wildfire emissions. The pollutants analyzed are the criteria pollutants of total organic gases (TOG), reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM), particulate matter less than 10 micrometers (PM10), particulate matter less than 2.5 micrometers (PM2.5) and greenhouse gases. Long-term, indirect and cumulative effects from implementation are analyzed using modeled future emissions from Hurteau et al. (2014) (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences).

1011

All alternatives should include a comparative analysis of smoke emissions over the life of the project, like alternative B/D on page 124 of the draft environmental impact statement. Also, the final environmental impact statement should include a comparison of health effects from air emissions for all alternatives as compared to catastrophic wildfire emissions effects. Also, emissions from prescribed fire activity should be compared (broadcast versus pile burning with mechanical)

Response: The final environmental impact statement analysis includes a comparison of health effects from air emissions for all alternatives, including catastrophic wildfire and fire restoration treatments. This analysis was conducted by evaluating total organic gases (TOG), reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM), particulate matter less than 10 micrometers (PM10), particulate matter less than 2.5 micrometers (PM2.5) and greenhouse gases for each alternative. Long-term, indirect and cumulative effects from implementation are analyzed over the life of the project using modeling information from Hurteau et al., 2014, including baseline management (final environmental impact statement, chapter 3, Air Quality, Affected Environment and Environmental Consequences). Research indicates that prescribed burning results in an 18 to 25 percent

reduction in wildfire emissions, with examples as high as 60 percent (Wiedinmyer and Hurteau 2010). Further analysis of prescribed fire emissions, such as broadcast versus pile burning with mechanical pre-treatment, occurs at the project level prior to implementation.

1012

Air quality and effects to greenhouse gas emissions, air quality and human health and coordination with air quality districts and regulators is not sufficiently addressed in this section. Also, there is an error on table 26, p. 123.

Response: See responses 1001, 1003, 1009 and 1011. The tables displaying annual emissions under each alternative have been updated in the final environmental impact statement and are also now Inyo-specific to the Inyo final environmental impact statement (chapter 3, Revision Topic 1: Fire Management, Air Quality, "Environmental Consequences" section).

Water Resources

1013

The draft environmental impact statement and draft plans should be revised to account for the significant impact that wildfire, drought, grazing, insects and disease have on water quality and supply.

Response: The Inyo final environmental impact statement acknowledges the role of fire and its interaction with drought, grazing, insects and disease on water quality and supply and has been updated (chapter 3, Aquatic and Riparian Ecosystem, "Water Quality and Watershed Condition" section).

The final plan includes plan components intended to protect water quality and quantity, considering impacts of wildfire, drought, grazing, insects and disease (WTR-FW-DC 01 through 04, WTR-FW-STD 01, TERR-FW-DC 10, RANGE-FW-STD 04, MA-RCA-DC 07, MA-RCA-GDL 02). In addition, monitoring water quality and quantity is part of the plan monitoring program (final plan, chapter 4).

1014

The plans lack adequate protective standards for water quality, including water temperature.

Response: The final plan contains plan components that address water quality in the "Forestwide Desired Conditions" section (WTR-FW-DC-02 and 03), "Forestwide Standards" (WTR-FW-STD-01), "Riparian Conservation Area Standards" (MA-RCA-STD-01, 03, 10, 17) and "Riparian Conservation Area Guidelines" (MA-RCA-GDL-02). Temperature is specifically addressed in MA-RCA-STD-01. Also, while water quality was not specifically noted in every riparian conservation area and conservation watershed plan component, all plan components that aim to restore hydrologic function and riparian health would have a positive impact on water quality.

1015

Exclude or limit cattle grazing to reduce water temperatures and other water quality problems, like thresholds to human health and safety, and decrease bacterial infections from livestock presence.

Response: Plan components have been added to the final plan to help guide grazing management and preserve water quality related to grazing, including: WTR-FW-DC 02, WTR-FW-STD 01,

RANG-FW-STD 07, MA-RCA-STD 12, MA-RCA-STD 17, and MA-RCA-GDL 03. The final plan also sets the desired conditions to support state-designated beneficial uses of water (WTR-FW-DC 02). MA-RCA-STD 12 allows removal of livestock if desired conditions are not met.

1017

The draft plan doesn't adequately bolster objectives, standards or guidelines to help protect recreational use and human health from bacterial contamination of forest waters -- an impact that was not adequately considered in the environmental analysis. Because of the widespread potential for pathogenic bacteria contamination due to livestock presence along forest streams as well as recreational use that may overlap in those areas, water quality should have specific forest plan direction for monitoring. There should also be forest plan direction describing appropriate responses to problems of contamination that may be identified by the monitoring.

Response: See issues 1014 and 1015 for specific forest plan components (direction) that address water quality and provide livestock grazing management direction intended to preserve water quality. Some plan components also indicate what should be done if monitoring desired conditions are not met (see MA-RCA-STD 12). In addition, the forest plan monitoring questions A03 (What is the status of water quality in forest waterbodies?) and FS02 (How are aquatic benthic macroinvertebrate communities indicating stream ecosystem integrity is being maintained in high-quality waters or improved in degraded waters?) specifically monitor the final plan desired condition WTR-FW-DC-02, which states, "Water quality supports state-designated beneficial uses of water and is sustained at a level that retains the biological, physical and chemical integrity of aquatic systems and benefits the survival, growth, reproduction and migration of native aquatic and riparian species." Indicators that will be used to monitor this plan component include: bacteria levels; 303(d) status; and benthic macroinvertebrate diversity, species composition and related metrics (see final plan, volume 1, chapter 4, Forest Plan Monitoring, Aquatic Ecosystems and Focal Species); this monitoring plan is based on best available science (see Monitoring Best Available Science document in the record).

1018

The current draft environmental impact statement and draft plans contain no objectives, standards or guidelines directly focused on water quality and the associated issue of the health of recreational visitors or downstream users.

Response: See responses to issue 1014, 1015 and 1017.

1019

The draft plans lack sufficient guidelines for maintaining functional watersheds and overall protection of water resources.

Response: The final plan establishes desired conditions that encourage maintaining or improving functional conditions of all watersheds on the Inyo (WTR-FW-DC and MA-RCA-DC) and sets forth standards and guidelines to direct management activities to support the desired conditions (WTR-FW-STD, WTR-FW-GDL, MA-RCA-STD, and MA-RCA-GDL). In addition, the final plan adds the new strategy concerning conservation watersheds, and associated plan components. The final plan also includes plan components (including guidelines) that will help to maintain functional watersheds and protect water resources including:

WTR-FW-STD 01; RANG-FW-STD-04; RANG-FW-STD 07; MA-RCA-STD 12; MA-RCA-STD 17; MA-RCA-GDL-02; MA-RCA-GDL 03; MA-CW-DC-01; MA-CW-OBJ-01; MA-CW-STD-01; and MA-CW-GDL-02.

1020

The bioregional assessment for Sierra Nevada forests acknowledges "…the most significant forest land water quality problems being sediment, nutrients, temperature and hazardous chemicals…" (p. 26). Based upon strong scientific evidence in peer-reviewed studies, the forest plans should include nutrients in their assessment of water quality.

Response: The intent of forest plans is to identify long-term or overall desired conditions and provide general direction for achieving those desired conditions and is not an assessment itself. The assessment was completed prior to the revised forest plan (as referenced in the issue). The final plan provides direction to use best management practices to mitigate adverse impacts to soil and water resources during the planning and implementation of forest activities (see plan component WTR-FW-STD 01). The bioregional assessment (pp. 26-27) discusses the high effectiveness of these best management practices in mitigating adverse impacts to soil and water resources.

In addition, the forest plan monitoring includes the following questions to monitor water quality: AE02 (To what extent are riparian areas functioning properly across different management areas and levels of disturbance?); AE03 (What is the status of water quality in forest waterbodies?); and FS02 (How are aquatic benthic macroinvertebrate communities indicating stream ecosystem integrity is being maintained in high-quality waters or improved in degraded waters?), specifically to monitor final plan desired conditions, MA-RCA-DC-06, which includes nutrients, and WTR-FW-DC-02, which requires water quality that retains the biological, physical and chemical integrity of aquatic systems (see final plan, volume 1, chapter 4, Forest Plan Monitoring, Aquatic Ecosystems and Focal Species). These monitoring questions and indicators were selected to measure the effectiveness of the plan, which was developed to allow management to adapt as necessary based on the findings of the monitoring.

1021

Management strategies that contribute to ground water recharge are lacking in the Plans, therefore, add plan components to address ground water and analyze impacts on groundwater that support the sustainable groundwater management act and include wells and springs management.

Response: Forestwide watershed desired conditions address groundwater (WTR-FW-DC-03), as do meadow desired conditions (RCA-MEAD-DC-01 and 02), lakes, pools and ponds desired conditions (RCA-LPP-DC-01) and spring and seeps desired conditions (RCA-SPR-DC-01).

Chapter 3 of the final environmental impact statement contains an analysis of impacts to water quality, water quantity and watershed condition. This analysis considers impacts to groundwater (final environmental impact statement, chapter 3, “Water Quality, Water Quantity and Watershed Condition,” “Environmental Consequences” section).

1022

Management emphasis to increase production and storage of water on the forests (for benefit of downstream users), including allowing construction of off-stream and other reservoir storage.

Response: Watersheds, including meadows, provide groundwater storage when properly functioning. The final plan includes objectives for meadow and riparian restoration (MA-RCA-OBJ-01, RCA-MEAD-OBJ-01), which would improve groundwater storage ability.

1023

Where possible without further damage to springs/water sources, remove waterline piping and maximize surface water at spring/stream sources supporting diverse riparian and meadow vegetation. Putting water back on the ground at the spring source helps expand the development of spring systems and improve the area capable of providing mesic vegetation.

Response: Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on “how” the desired conditions outlined in the plan are met, compel any particular action, authorize projects or activities, guarantee specific results, or specify or affect the type or source of the funding used to implement the final plan (36 CFR 219). Therefore, the final plan cannot direct any actions, such as removing waterline piping. The final plan does, however, include plan components that provide general direction that will help to maximize surface water at spring/seep sources, support diverse riparian and meadow vegetation and ensure proper functioning condition: “Terrestrial Ecosystems and Vegetation Special Habitats” section, “Desired Conditions for Springs and Seeps” section, WTR-FW-DC 05, RANG-FW-STD 08, MA-RCA-STD 13, MA-RCA-STD 14 and MA-RCA-GDL 01.

1024

The plans lack thresholds for limiting cumulative effects to water quality, reducing protection of water resources.

Response: Specific thresholds for limiting cumulative effects are not defined in the Final Plan; however, riparian conservation area direction has not been changed from the 2004 Sierra Nevada framework plan, so there has been no reduction in protection of water resources from the existing forest plan. In addition to bringing over the riparian conservation area direction from the existing plan, the revised Plan includes additional desired conditions, standards, and guidelines designed to protect water quality and reduce direct, indirect and cumulative effects, including: WTR-FW-DC, MA-RCA-DC,WTR-FW-STD, WTR-FW-GDL, MA-RCA-STD, MA-RCA-GDLWTR-FW-STD 01, RANG-FW-STD-04, RANG-FW-STD 07, MA-RCA-STD 12, MA-RCA-STD 17, MA-RCA-GDL-02, MA-RCA-GDL 03, MA-CW-DC-01, MA-CW-OBJ-01, MA-CW-STD-01 and MA-CW-GDL-02. Adhering to this plan direction and moving towards desired conditions will minimize cumulative effects and create conditions for long-term net benefits within watersheds.

1025

Language about best management practices is confusing, saying in one place that best management practices will reduce impacts to water quality to "less than significant

levels" and then later saying some management activities may cause impacts. Please clarify the language on best management practices.

Response: The statement, “Based on results of past monitoring, best management practices are expected to reduce both short- and long-term adverse impacts to less than significant levels” is included in the final environmental impact statement under the “Assumptions” subsection under chapter 3: Water Quality, Water Quantity And Watershed Condition. It is included to disclose an assumption about how different management tools that were used in the analysis of effects may affect water quality, quantity and overall watershed condition. Modifications have been made to the final environmental impact statement to clarify the differences between the analytical assumptions and the discussion of possible effects.

1026

The following objectives, standards and guidelines are strongly recommended to be added into each of the three forest plans in order to increase ecological restoration, ensure protection of water quality and improve conditions for wildlife species associated with aquatic habitats. Objective - Protect the health of forest visitors by ensuring forest waters meet the standards for recreational contact with water in all streams throughout the forest. Standard - Monitor water quality (in compliance with the appropriate regional water board protocol) on all grazing allotments annually by sampling water quality at a representative stream location where livestock may concentrate or persist for extended periods. Guideline - Within two years of forest plan approval, the forest shall select a representative area with a high level of dispersed recreational use that also overlaps with livestock use. Within five years of forest plan approval, at least one season of water board-consistent protocol sampling of water quality shall be implemented in the stream at that site by the forest in order to assess whether the water consistently meets health and safety standards for recreational contact.

Response: Although your suggested components weren’t specifically added to the final plan, other plan components, including objectives, standards and guidelines focused on water quality and the associated issue of the health of recreational visitors or downstream users have been added, including: RANG-FW-STD-04; MA-CW-DC-01; MA-CW-OBJ-01; MA-CW-STD-01; MA-CW-GDL-02; MA-RCA-STD-12; MA-RCA-STD-17; and MA-RCA-GDL-02.

In addition to these components; the final plan also includes desired condition WTR-FW-DC 02, which states, “Water quality supports state-designated beneficial uses of water. Water quality is sustained at a level that retains the biological, physical and chemical integrity of aquatic systems and benefits the survival, growth, reproduction and migration of native aquatic and riparian species.”

Grazing monitoring requirements are directed by (Region 5). The final plan does not countermand existing law, regulation or policy.

The forest plan monitoring, described in chapter 4 of the final plan, includes monitoring questions AE02 (To what extent are riparian areas functioning properly across different management areas and levels of disturbance?); AE03 (What is the status of water quality in forest waterbodies?); and FS02 (How are aquatic benthic macroinvertebrate communities indicating stream ecosystem integrity is being maintained in high-quality waters or improved in degraded waters?), which specifically monitor final plan desired conditions MA-RCA-DC-06 and WTR-FW-DC-02. Indicators that will be used to monitor these plan components include: vegetation cover, structure and composition; floodplain and channel physical characteristics; bacteria levels; 303(d) status;

and benthic macroinvertebrate diversity, species composition and related metrics (see final plan, volume 1, chapter 4, Forest Plan Monitoring, Aquatic Ecosystems and Focal Species). These monitoring questions and indicators were selected to measure the effectiveness of the plan, which was developed to allow management to adapt as necessary based on the findings of the monitoring.

Water quality monitoring follows state requirements under water board general orders. The final plan outlines the approach to be followed for all water quality monitoring, and it is consistent with water board requirements.

1027

Environmental impact statement and plan must include an assessment of and documentation showing all water wells, diversions, withdrawals and water developments that utilize water in the watersheds to establish a baseline of water availability for making a decision as to what can be done to protect the forest ecosystem from drought. The analysis should also consider these uses when evaluating the impacts of management actions in project planning.

Response: The vast majority of water developments on or adjacent to the Inyo National Forest are not under the control or authority of the Forest Service. Holders of water rights throughout the state are under the jurisdiction of the California Water Resources Board. A full assessment of the volume of water removed and potential impacts of developments on perennial flows and ground and surface waters was not feasible across the entire forest. Also, see response 1013.

1028

A full assessment of the volume of water removed and all impacts of range developments, on perennial flows and ground and surface waters must be provided to determine if removal of livestock water troughs (including haul sites), pipelines, spring developments and wells is needed.

Response: A full assessment of the volume of water removed and potential impacts of developments, on perennial flows and ground and surface waters was not feasible across the entire forest. Grazing is authorized on Forest Service lands, provision of water for cattle is part of those provisions, and access to water on forest lands is often connected to water rights, which are under the jurisdiction of the California Water Resources Board.

1029

Impacts of uses other than grazing on E. coli contamination in water sources were not analyzed (for instance, recreation and visitors); therefore, analyze other sources of E. coli on water quality.

Response: Impacts of recreation on water quality is addressed in the Sierra Nevada Bioregional Assessment (p. 30). Recreation was found to be associated with the lowest fecal indicator concentrations. The two most critical parameters with the potential to influence water quality at the landscape scale assessed in forest plans or to be influenced by climate change are sediment loading and water. Other water quality parameters such as nutrient inputs (like nitrogen and phosphorus), metals and bacteria (such as *E. coli)* are also a concern to water quality but are best addressed at the project level when considering requirements of the Clean Water Act (final environmental impact statement, chapter 3, Water Quality, Water Quantity and Watershed Condition, “Indicators and Measures” section).

1030

The draft environmental impact statement is lacking baseline data on surface and groundwater resources, and is therefore lacking an analysis of the potential impacts of groundwater use on surface water resources.

Response: Water quantity, including surface and groundwater, is an indicator for analysis in the final environmental impact statement (chapter 3, Water Quality, Water Quantity and Watershed Condition, Indicators and Measures section). Water quantity is considered in the affected environment section and the environmental consequences section for each alternative (final environmental impact statement, Water Quality, Water Quantity and Watershed Condition, affected environment and environmental consequences section).

In addition, the final plan also addressed groundwater in several places (WTR-FW-DC-03, RCA-MEAD-DC-01 and 02, RCA-LLP-DC-01, RCA-SPR-DC-02).

1031

The plan and draft environmental impact statement is lacking information about the current conditions of stream and rivers and the cumulative impacts of soil disturbance on streams. The analysis should explain the method used for determining the watershed impacts caused by erosion on roaded areas.

Response: The final environmental impact statement provides the basis for analysis across the landscape of aquatic habitat, including rivers, streams, meadows, springs and lakes. This qualitative analysis is based primarily on the best available scientific information derived from forest assessments (USDA FS 2013a, 2013b, 2013c), the bioregional assessment (USDA FS 2013d), the science synthesis (Long et al. 2014) and recent reports and publications that assess trends in current conditions, and where available, assessment of effects of management actions. Roads and their contribution to degradation of water quality was discussed at a landscape or province level in the bioregional assessment (pp. 16 and 17). The restoration of an area would require these assessments at the project level.

1032

The draft environmental impact statement does not adequately account for the use of water to downstream local communities and the impacts of management on that water quality, and water quantity; therefore, additional analysis should be completed considering impacts to downstream water quantity.

Response: The importance of forest waters for downstream users is addressed in the final environmental impact statement (final environmental impact statement, chapter 3, Water Quality, Water Quantity and Watershed Condition, “Background” section), and impacts to downstream water quantity and quality is also addressed (final environmental impact statement, chapter 3, Water Quality, Water Quantity and Watershed Condition, environmental consequences section). Additionally, the final environmental impact statement states that implementing standard best management practices reduces management impacts to water quality on the Inyo, which protects downstream water quality as well (final environmental impact statement, chapter 3, Water Quality, Water Quantity and Watershed Condition, “Assumptions” section).

1034

The draft revised forest plan’s guidelines for watershed conditions, WTR-FW-DC-01, states that "Adequate quantity and timing of water flows support ecological structure and functions, including aquatic species diversity and native riparian vegetation." This

should be revised to include support for irrigation, agriculture, stock watering and economic uses. Such revision is necessary for compliance with the Multiple Use Sustained Yield Act and the National Forest Management Act, which require that plans address multiple uses.

Response: The Multiple Use Sustained Yield Act (15 Public Law 86-517) states, "it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed and wildlife and fish purposes." Similarly, the 2012 planning regulations require that plans "provide for social, economic and ecological sustainability." This is accomplished by including plan components, including standards and guidelines, "to guide the plan area's contribution to ecological, social and economic sustainability." The final plan has met the Multiple Use Sustained Yield Act and the 2012 Planning Rule because it includes plan components that provide for social, economic, and ecological sustainability, sustainable recreation, range, timber and other renewable and nonrenewable energy and mineral resources (final plan, chapter 2, Forestwide Desired Conditions and Management Direction).

1040

The draft environmental impact statement should employ proper human safety precautions on the forests by adopting state water quality sampling protocols where grazing and recreational use overlap.

Response: The Forest Service is required to employ all water quality best management practices to on-the-ground activities, including grazing. The effectiveness of these best management practices is monitored throughout the National Forest System every two years. Water quality monitoring on the Inyo follows state requirements under Water Quality Control Board general orders. The final plan outlines the approach to be followed for all water quality monitoring (Inyo final plan, chapter 4, "Monitoring").

1033

The draft environmental impact statement does not adequately account for the amount of local water drafting on habitat quality and the impacts of streamflows on the depletion pool aquatic habitat, therefore, additional analysis should be completed considering impacts how this change will better protect water and habitat quality for fisher and other aquatic organisms.

Response: Comment 31707-13 is in regards to the Sierra Forest Plan.

The Revised Inyo Forest Plan requires that water drafting sites are located to minimize adverse effects to stream flows and depletion of pool habitats (see standard MA-RCA-STD-06). The drafting of water must comply with conditions set forth by the State of California in the water right, whether it be owned by the Inyo National Forest or other water right holder.

Inyo-specific Issues

Partnerships

2000

Support for the Inyo National Forest plan to designate a partnership coordinator, a position on the leadership team dedicated full-time (some requests are to include it as a

goal, include for each district; some within one year of plan and some within three years)

Response: A goal has been added to the "Volunteer, Interpretation, Partnerships and Stewardship" section of the Inyo forest plan that addresses the need to hire a forestwide partnership/volunteer coordinator (VIPS-FW-GOAL 10).

2001

The plan should specifically direct agency managers to partner with other groups who can fill that niche when the agency lacks the capacity to manage the recreational quality of the forest to assure that forest lands are managed sustainably. Unless specific guidelines and directives are written into the plan to direct Inyo staff to partner with outside groups, it's a missed opportunity to sustainably steward our recreational lands in the Inyo National Forest.

Response: Within the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan desired conditions address the need to partner with multiple partners (VIPS-FW-DC 01, 02). Goals (VIPS-FW-GOAL 04, 05, 07 and 09) address the need to partner for recreation benefits. Standards and guidelines were not included in the plan for partnerships, because we are dependent upon available partners to achieve the work. The definition of the goals and potential management approach plan components meet the intention of working with partners to achieve the plan's desired conditions.

2002

The emphasis on partnerships is critical and necessary to increase recreation opportunities and directly engage the public in forest stewardship. Partnerships, however, should remain in an appropriate role and context to augment, but not replace, professional services.

Response: The "Volunteer, Interpretation, Partnerships, and Stewardship" section of the plan address the need to partner to improve recreation opportunities on the Inyo (VIPS-FW-DC 01 and 02) and Goals (VIPS-FW-GOAL 04, 05, 07, and 09). The plan direction added for partnerships does not provide a mechanism to replace professional services, it is only providing the opportunity to add additional capacity and funding to the national forest.

2003

Partnerships: In these tight-budget times, the agency can work to better monitor, maintain and protect recreational opportunities and the health of the national forest by fostering strong partnerships and cooperation between Forest Service employees, local communities, nonprofit organizations, businesses and other partners. The final Inyo Forest Plan should include additional details on how the agency will hold itself accountable to creating and fostering the partnerships that are so vital in these tight Federal budget times.

Response: Desired conditions in the plan outline what we should strive to achieve in the future. Desired conditions and goals have been developed to address the need for partnerships to improve recreation opportunities (VIPS-FW-DC 01 and 02; VIPS-FW-GOAL 04, 05, 07 and 09). Standards and guidelines were not included in the plan for partnerships, because we depend on available partners to achieve the work.

2004

Mammoth Lake Recreation (MLR) supports the Citizen Suggested Desired Conditions document developed and submitted by the Eastern Sierra Recreation Collaborative. MLR would like to emphasize a few key desired conditions included in the Eastern Sierra Recreation Collaborative document that should be integrated into the final plan as they align with MLR's mission and vision for sustainable recreation experiences in Mammoth Lakes:

Partnership Coordinator: To better facilitate utilization of Town of Mammoth Lakes Measure R & U funds to enhance our trail system and sustainable recreation experience.

Volunteer Coordinator: MLR strongly supports this suggestion and offers to be a willing partner to help develop a robust and effective volunteer program to share with visitors and residents alike in Mammoth Lakes.

Interpretive and Informational Signage: The Inyo National Forest provides adequate interpretive signage and information so forest users understand how to recreate legally and responsibly. MLR has taken the lead to help develop comprehensive information-sharing plans and looks forward to engaging with the Inyo National Forest to further refine this effort.

State of the Art Developed Recreational Facilities: The Inyo National Forest's developed recreation facilities are updated, maintained and patrolled by forest staff, established partners and volunteers. MLR believes this is an important lynchpin in a sustainable recreation program and important to the outdoor recreation experience. MLR looks forward to working with the Inyo National Forest to leverage funds to help improve recreation facilities and sites on the forest.

Response: Within the "Volunteer, Interpretation, Partnership and Stewardship" section of the plan, a goal has been added to address the need to hire a forestwide partnership/volunteer coordinator (VIPS-FW-GOAL 10). Desired conditions (VIPS-FW-DC 01 and 02); goals (VIPS-FW-GOAL 04, 05, 06 and 07); and potential management approaches address the need to have partners help with interpretation using a variety of media and methods. These forestwide plan components would apply to partnership opportunities on all ranger districts of the Inyo National Forest, including the Mammoth Ranger District.

The plan also includes language about facilities, detailed in RCE-FW-DC 07, which state: New developed recreation infrastructure is located in ecologically resilient landscapes, while being financially sustainable and responsive to public needs. Furthermore, forest management of infrastructure not only comes from the plan, but also other law, regulations and policies to provide safe, energy-efficient, accessible, functional, efficient, aesthetically pleasing and cost effective buildings and related facilities (FSH 7309.11 chapter 10).

2005

Support for continued collaboration between BLM and the Forest Service, including in operations at the Forest Service/BLM interagency fire station in Lundy Canyon, is endorsed by People for Mono Basic Preservation (PMBP) and should be specifically identified in the draft plan. The successful operation of this fire station is crucial to fire protection efforts on the north end of the Mono Basin. The BLM fire station in Lundy is

the first responder for wildfire on federally-owned lands that surround Mono City and residences located along Hwy 167.

Response: Fire goal 02 addresses the need to coordinate with other jurisdictions, including Federal entities, regarding prevention, preparedness, planned activities and responses to wildland fires (FIRE-FW-GOAL 02). The management of this specific fire station would be implemented using this goal at the project-level.

2006

The fire district wishes to comment on the state of communications in Mono County. The forest needs to be a partner in making sites available that can be utilized for adequate communications throughout the county. Being the keeper of virtually all of the high country locations places a burden on the forest to work with local governments to resolve communication issues.

Response: The plan provides for opportunities to work with local fire districts in the development of major new structural facilities on National Forest System lands (FIRE-FW-GOAL 07). In addition to this language, the plan provides forestwide direction for partnerships, which would include working with the fire districts (VIPS-FW-DC 01 and 02 and VIPS-FW-GOAL 01). In addition, the Inyo forest fire and aviation management staff attempt to coordinate radio communication sites, frequencies and protocols with cooperating local government agencies during annual reviews of the Cooperative Fire Assistance Agreement and accompanying Operating Plan for Cooperative Fire Protection Agreement. Additionally, Forest Service communication sites are addressed in FSH 2709.11 chapter 90, Communication Site Management. Forest policy allows for private or county entities to apply for a special use permit for additional radio communication sites. The Inyo is committed to following the special use permitting process for any federal, state or local entities in an effort to improve communication infrastructure. Many potential new site locations would fall within designated wilderness and would require approval of a minimum requirement analysis, environmental analysis and Section 106 cultural compliance. We are currently partnered with county public safety agencies (including Mono) on communication sites in the following areas: Mammoth and June Mountains, Casa Diablo, Sherwin Summit, Crestview and Glass Mountain.

2007

There is a need to have continued fire partnerships amongst multiple landowners, including the NPS, the Forest Service and private landowners. The plan does not discuss partnering on implementation of the Reds Meadow Valley Fire Management Plan. This needs to be reflected in the plan somewhere.

Response: The plan provides language to address the need to continue to work with other land management agencies and private landowners (FIRE-FW-GOAL 02, 03, and 05 and potential management approaches). The plan does not specifically address the Reds Meadow Valley Fire Management Plan because any work to implement this plan would be determined at the project level. We are currently evaluating and beginning the environmental analysis for initiating future projects in Reds Meadow Valley and will consult with Devils Postpile National Monument during the planning and implementation process.

2008

Partnership Goal (INF)

Include a goal to address all the current shortfalls in personnel on the Inyo National Forest

Response: Plan components have been developed to use partners and volunteers to "provide additional capacity to effectively and efficiently meet plan desired conditions and deliver services to the public" (VIPS-FW-DC 01). Additional Goals (VIPS-FW-GOAL 01, 03, 04, 05, and 07) and Potential Management Approaches (page 99) support this desired condition. These plan components add direction to address current shortfalls in personnel on the Inyo.

2009

Invasive Plant Partnerships (INF)

The forest is already moving forward with invasive species control projects (see the current quarter's Schedule of Proposed Actions), and these and other vegetation management programs might be suitable for partnerships, such as the California Native Plant Society, which has other partnership agreements with other region 5 forests.

Response: Plan components within the "Volunteer, Interpretation, Partnerships and Stewardship" section (VIPS-FW-DC 01; VIPS-FW-GOAL 01) of the plan would apply to the development of partners for the treatment and control of non-native invasive and noxious weeds. Appendix C: Renewed Partnership Focus for the Inyo National Forest also addresses the need for partnerships for restoration and improving ecological conditions on the Inyo National Forest.

2010

Eastern Sierra Land Trust Partnerships (Inyo National Forest).

P. 148 - Consider adding Eastern Sierra Land Trust to list of partners achieving on-the-ground land management goals via conservation easements and recreation fee land.

Response: Reference to ecological restoration was added to Appendix C: Renewed Partnership Focus for the Inyo National Forest in the Creating a Partnership Culture (page 141). This addition addresses the need for partners for ecological restoration, including partners helping with conservation easements and recreation fee lands. A reference to the Eastern Sierra Land Trust was not added in this appendix, because we only included partners we have a formal partnership agreement with, which at this time is the Eastern Sierra Interpretive Association. Plan direction does not preclude us from establishing a formal partnership agreement with other groups, such as the land trust.

2011

Range Partnerships (Inyo National Forest).

Specific plan edits/modifications. Range, p. 37 (forest plan), makes no mention of Forest Service agency partners and non-governmental organization partners (for example, BLM, Department of Water and Power, Eastern Sierra Land Trust) who often collaborate with us to achieve common goals.

Response: The "Volunteer, Interpretation, Volunteer and Stewardship" section of the plan has desired conditions that address working with partners (VIPS-FW-DC 01) and goals that address working with other Federal, state, and local agencies, and nonprofits, organizations and businesses (VIPS-FW-GOAL 01 and 03). Appendix C: Renewed Partnership Focus for the Inyo

National Forest also addresses the need for partners to achieve ecological restoration work; this includes livestock grazing partners (page 141).

2012

Community Partnerships (Inyo National Forest).

The forest plan should specifically acknowledge this important relationship with communities, and include concrete strategies for working with these communities both for public benefit purposes and to foster stewardship by the communities. As a specific example, the plan should include increased education and enforcement in areas near communities. Illegal or inappropriate activities in nearby forest lands have the potential to significantly impact local communities. A very clear example is an illegal campfire that burns out of control and becomes a wildfire threatening a nearby community. The impacts of activities on nearby forest lands have been a concern in every community in Mono County, and especially in the Swall Meadows area.

Response: Desired condition 01 in the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan (VIPS-FW-DC) addresses the need to build partnerships that add capacity for effectively and efficiently meeting desired conditions and delivering services to the public. This includes fostering stewardship with local communities (VIPS-FW-GOAL 01 and 03). Enforcement of uses on public lands is regulated through specific forest orders, or other laws, regulations or policies. These address illegal activities on Federal lands and Federal lands adjacent to private property. The plan does not need to include management direction for these illegal uses because of this other direction.

2013

There needs to be more coordination and communication between the National Forest Service and the National Park Service and Bureau of Land Management. This needs to be reflected in the plan. [There are specific recommended language changes and additions on a variety of topics from climate change, invasive species, visitor resources, fuels, fire management and other areas.]

Response: Plan direction for coordination and communication between other Federal agencies, such as the National Park Service and Bureau of Land Management are included in the following sections: FIRE-FW-DC 04; REC-FW-GOAL 02, 04 and VIPS-FW-GOAL 01; and Pacific Crest Trail in Designated Wilderness Potential Management Approach.

Forest Products

2014

Vegetation management on the Inyo National Forest should emphasize fuelwood utilization. (Comment has many specific proposals for related standards and guides on log and snag sizes, etc.). The term timber harvest is a loaded term that is misleading on the Inyo National Forest and should be removed. Specific plan direction should be added to guide management of fuelwood resources.

Response: The 2012 Planning Rule requires plans "Identify the maximum quantity of timber that may be removed from the plan area" (section 219.11(d)(6)). Directives on how timber suitability are to be determined can be found in the Forest Service Handbook 1909.12, chapter 60, Forest Vegetation Resource Management. Appendix E in the plan describes areas determined suitable for timber production. A description of timber and other forest products can be found in the glossary of the plan.

While no timber harvest “sawlog” products (generally referred to as “timber” harvested to make dimensional lumber) are currently being sold on the Inyo, we are retaining this option. Even though we sell “fuelwood” as a product, a purchaser is free to use this material as they choose, in manufacturing a final product.

2015

Add fuelwood related monitoring including: periodic public surveys of the fuelwood program to assess its acceptance; and add monitoring of 15-to-29-inch down logs in open areas as shown on the fuelwood map

Response: The current Inyo National Forest fuelwood strategy was developed in 1998 with public participation. Retention of materials 30 inches in diameter and greater for wildlife habitat and soil nutrient recycling were part of this strategy, as well as retention of the majority of funds generated to manage implementation of the program. We have continued to solicit comments on this strategy since its inception. As part of this strategy, once an area has gone through a suite of treatments (vegetation management and fuels reduction), it is closed to fuelwood collection until the next entry, which will probably take place in about 15-20 years.

Ecosystem and vegetation type desired conditions and guidelines for snags and logs are listed in multiple subsections in the final plan (chapter 2, Terrestrial Ecosystems and Vegetation).

2016

Specific plan edits/modifications. Pacific Crest Trail, p. 66 (forest plan), change wording of "timber harvest." It is really not applicable to the Inyo National Forest anymore.

Response: This guideline has been moved to the potential management approaches section under MA-PCT outside “Designated Wilderness” section. Timber harvest is included in this potential management approach because this management approach is written to be inclusive of management activities that could be used to manage vegetation within the Pacific Crest Trail corridor. In response to this comment, we did move the words timber harvest and put them at the end of the list of management actions the Inyo could use to treat vegetation within the Pacific Crest Trail corridor.

2017

Specific plan edits/modifications. P. 36 (forest plan), 03 - "local communities" - expand 03 to specifically note public fuelwood program as offering economic, recreational and even educational benefits to the local public (via map).

Response: The desired condition 03 located in the “Local Communities” section of the plan, notes forest products as contributing to local communities (page 63). Forest products include personal and commercial fuelwood activities, as defined in the plan’s glossary. Maps of fuelwood gathering areas are found at Inyo National Forest visitor centers and ranger stations in Lone Pine, Bishop, Mammoth Lakes and Lee Vining, CA.

2018

There needs to be some recognition in this land management plan of the importance of public involvement in our fuelwood management program.

Response: The current Inyo National Forest fuelwood strategy was developed in 1998 with public participation. Retention of materials 30 inches in diameter and greater for wildlife habitat and soil nutrient recycling were part of this strategy, as well as retention of the majority of funds

generated to manage implementation of the program. We have, at a minimum, annually continued to solicit comments on this strategy since its inception.

The 2012 Planning Rule emphasizes that forest plans are intended to guide management of national forests so they are ecologically sustainable and contribute to social and economic sustainability while providing people and communities with a range of benefits, consistent with the Multiple Use Sustained Yield Act (15 Public Law 86-517) and National Forest Management Act of 1976 (P.L. 94-588) (77 FR 21187; final environmental impact statement, chapter 1, Introduction, "Regulatory Direction," plan revision under the 2012 Planning Rule). This plan revision process give the public an opportunity to comment on a variety of forest plan components, including management of forest products. Each new vegetation management project undergoes environmental analysis, further giving the public additional opportunities to be involved, as most forest health and fuels reduction projects involve public fuelwood opportunities.

2019

As an attachment to my comments, please find the history section of the current "Three Creeks Environmental Assessment," which documents the evolution of ecosystem management/vegetation management on the Inyo National Forest, with the byproduct of commercial and public fuelwood, not "timber." I also included two comment letters (Noles and Friends of the Inyo) from that Environmental Assessment that reflect the importance of the thinning/fuelwood program to the Inyo National Forest communities. This information should be incorporated and used both in chapter 1 (introduction), where it is missing, and in the introduction and desired conditions of chapter 2. People are an important component of the Inyo National Forest's forest management, as visitors or as residents.

Response: See responses to comments 2014 and 2021.

Comments specific to the Three Creeks Environmental Assessment have will be addressed during the separate planning process for that project.

2020

Inyo National Forest timber is used in the draft environmental impact statement as the measure for evaluating the benefits to people. Timber has always been a very small fraction of the Inyo's operations and therefore its benefits to people are negligible

Response: The final plan (chapter 2, "Timber and other Forest Products" section) recognizes vegetation management as one of many tools to meet ecosystem and vegetation type desired conditions. As part of its conservation mandate, the Forest Service manages lands for multiple use and sustained yield. Harvesting timber, no matter what the product, occurs on lands deemed capable, available and suitable for timber production. Many portions of the Inyo National Forest were cut for timber, including for Bodie in the late 1800s. Near the same time, wildfire suppression policy was adopted to protect natural resources. As a result, the Inyo National Forest has not developed as it would have if natural processes, such as fire, occurred.

Other forest products, such as fuelwood, are bought from a commercial vendor or personally gathered for home heating use, and are generated as a secondary benefit from implementation of forest health and fuels reduction projects. Some of these projects are being implemented in areas not traditionally harvested in the past, such as wildland-urban interface zones. This is also recognized in the plan, especially with regards to public safety.

2021

Inyo National Forest "Timber and other forest products" "Proposed and possible Actions" (appendix B forest plan) - get rid of "timber," emphasize other forest products. Note social, economic and recreational factors involving fuelwood for resort residents (poor or rich), also for Bishop residents and others in small communities.

Response: Forest Service management of resources includes water, range, wildlife, recreation and wood. Timber resources, no matter the product being sold, is part of multiple use of National Forest System lands. While no sawlog products (generally referred to as “timber” harvested to make dimensional lumber) are currently being sold on the Inyo, we are retaining this option. Even though we are selling “fuelwood” as a product, a purchaser is free to use this material in manufacturing a final product. Some locals view collection of firewood as a recreational activity, and many as a less expensive means for home heating.

Desired conditions, objectives, goals, standards and guidelines listed under Timber and Other Forest Products, as well as Terrestrial Ecosystems and Vegetation (final plan, chapter 2), will guide forest management for the benefit of all Americans.

2022

We would encourage the Inyo National Forest to greatly reduce areas of timber harvest and salvage logging within the forest, and to reduce the number of trees cut per acre. The distance to the nearest lumber mill and the length of time needed for the forest to regenerate would make anything but a total giveaway of public resources uneconomical.

Response: The extraction of forest product on National Forest System lands is guided by many laws (Multiple Use Sustained Yield Act, others). Timber harvest is but one tool used by the Forest Service to proactively help maintain forest health, protect wildlife habitat and reduce hazardous fuel loading. While areas found suitable for timber production are limited on the Inyo National Forest, there is a standard for this calculation (final plan, appendix E). The need to reduce fuel in wildland-urban intermix areas has served to potentially expand harvest activities, in conjunction with other treatments, beyond traditional timber management areas in order to protect communities and other developments. Most forest products are sold locally in the form of commercial and public fuelwood. This plan maintains options to produce sawlog products in the event markets become more favorable to produce on the Inyo National Forest. Salvage efforts on the Inyo have only occurred in the event of catastrophic events and have been rare occurrences. They have only been performed with restoration efforts in mind.

2023

Salvage Logging.

There should be no logging or salvage logging in the Inyo National Forest for any reason other than in rare cases to protect human life and property, for mechanical treatments near communities, for fire prevention and a small amount for local use.

Response: Desired conditions, objectives, goals, standards and guidelines listed under Timber and Other Forest Products and Terrestrial Ecosystems and Vegetation (final plan, chapter 2), will guide management for the benefit of all Americans. The generation of wood products is part of resource management on National Forest System lands. Salvage and traditional saw timber harvest activities have been rare on the Inyo for decades. Harvest of wood products has been and continues to be used as a tool by Inyo National Forest personnel to proactively help protect

wildlife habitat, maintain forest health and reduce hazardous fuel loading where deemed appropriate. In most cases, this is in association with other fuel reduction activities, which result in local commercial and public fuelwood production. In more recent years, treatments have occurred in and around local communities, on both National Forest System lands and adjacent private lands, funded by Federal dollars in order to make these communities more resilient to fires.

Fire and Smoke Management

2025

Fire suppression activities should be given very high priority in the Inyo Draft Plan.

Response: Within the plan, fire suppression remains a tool for any area on the national forest; this includes all the Strategic Fire Management Zones (final revised plan, chapter 3, Strategic Fire Management Zones, Introduction). The fire management zones are used to support decision makers before a fire ignition occurs, by pre-assessing the risk and benefits of wildland fire. All fire management actions would be determined during a wildfire incident, addressing site-specific conditions and risk.

2027

The fire district supports many of the goals and actions that are identified in the proposed plan, but we have some concerns on how these items will be implemented, including: Restoration of the ecosystem to be more fire-resilient, especially around communities, to lessen the threats. Coordination with local jurisdictions regarding prevention, preparedness, planned activities and responses to wildfires. Assistance to communities to become more adapted to fire, thus improving the ability to sustain a fire without loss of life and property, in addition to minimizing the economic hardship to the community and region. Develop with local community input the use of prescribed fire, managed wildfire, mechanical treatment and/or thinning to reduce vegetation accumulations to lower the risk of unwanted/catastrophic wildfires. Provide defensible space as provided for in California Public Resource Code 4291 on administrative sites, campgrounds and structures authorized by use permits. The forests have also been directed by headquarters to implement the provisions of the 2015 International Wildland-Urban Interface Code, and discussions on implementation methods should be incorporated into the plan. Use wildfires forestwide to meet multiple resource management objectives where and when conditions permit and where risk is within acceptable limits. Coordinate with county and town staff and local fire districts in the development of new and maintenance of existing structural facilities on National Forest System lands.

Response: Restoration of the ecosystem for fire resilience is a primary objective of the plan and will require cooperation and compromise from all sides (FIRE-FW-DC 02, 03, TERR-FW-DC 02 and 06; MA-GWPZ-DC 02; MA-WRZ-DC 01, 02 and 03; and MA-WMZ-GOAL 01 and 02). Plan objectives are based on current, peer reviewed science and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments, including mechanical, prescribed and wildland fire managed for resource benefit (TERR-FW-OBJ 01 and 02). These activities would directly benefit wildland-urban interface communities, infrastructure and historic, cultural and natural values at risk. Proposed alternative B estimates 20,000-25,000 acres per decade of both mechanical and prescribed fire and 49,000 acres per decade of fire-related restoration activities.

The plan provides direction to treat hazardous fuels and vegetation on Federal land adjacent to private property through proactive, mechanical fuel reduction treatments followed up by prescribed fire when feasible (FIRE-FW-GOAL 02, 03 and 05). We have partnered to varying degrees with private entities, including Sierra Nevada Conservancy, California Trout and local Fire Safe councils and commenced or completed mechanical fuel reduction projects in moderate to high hazard areas identified in the 2009 Inyo County Community Wildfire Protection Plan including Crowley Lake, June Lake Loop and Mammoth Lakes Knolls subdivision. Both private and Federal structures are more defendable if clearance has been conducted per CPR Code 4291. The plan addresses defensible space in FIRE-FW-GOAL 05. The Inyo aligns with the International Code Council 2015 International Wildland-Urban Interface Code when structures are built or significantly remodeled to the extent possible and as funding allows.

Once mechanical and prescribed fire treatments are conducted in and around wildland-urban interface communities, beneficial lightning fires can be considered for management for resource benefits in all of the fire management zones if conditions allow and they can be conducted safely. Mechanical and prescribed fire treatments are only a surrogate for natural fire on the landscape and thorough restoration and resilience can only be achieved through managing more fire on the landscape. This will require a greater understanding, tolerance and acceptance of fire, risk and smoke in and around our wildland-urban interface communities.

2029

There needs to be a buffer established between wilderness and communities in order to provide fire management personnel adequate acreage to deal effectively with fuels reduction methods. The establishment of wilderness boundaries in close proximity to communities develops a situation that will breed disaster.

Response: Wilderness boundaries that have already been established cannot be altered and there are no proposed new wilderness areas within close proximity to Mammoth Lakes or other Inyo National Forest wildland-urban interface communities in the preferred alternative (final environmental impact statement volume 3: maps, map 21, “Recommended Wilderness,” alternative B and B-modified). In the *general wildfire protection zone*, the preferred alternative emphasizes active fuel reduction treatments along ridgetops, roads and other natural and manmade features that can serve as strategic anchor points for larger prescribed burns and to create areas of low fuel that can be used to (respond to and/or) manage wildfires. Due to the high likelihood of wildfire occurring in this zone and possibly spreading into the community wildfire protection zone, wildfires would most often be suppressed to reduce the threat to communities and assets. In some instances, wildfires could be managed to meet resource objectives if conditions allow and when it could be done in a safe manner (final revised plan, chapter 3, Community Wildfire Protection Zone). Communities can partner with the Inyo and the Federal government (for example, through Fire Safe councils) and apply for funding to treat hazard fuels on private land adjacent to federal land.

Recreation

2030

Economic Value of Recreation in Eastern Sierra.

The economic value of recreation needs to be emphasized more as a driving force of the Eastern Sierra economy and in California (generates over $85 billion in consumer spending, 732,000 jobs and $6.7 billion in state and local tax revenue).

Response: The importance of recreation to the local economy from activities and opportunities on the Inyo National Forest are presented in the final environmental impact statement, Economic Conditions, Key National Forest Contributions section and final environmental impact statement, Economic Conditions, Important Inyo National Forest Contributions to Inyo County section.

2032

Little Lakes Basin, near Tom's Place, should be included as a recreation place. It is not totally clear to me that this beautiful, highly-accessible trailhead area is a "listed" recreation place - but it should be. It has enough human pressure to warrant special attention as to how it should be managed.

Response: The “Recreation Places” section has been replaced by “Sustainable Recreation Management Areas,” which can be found in chapter 3 of the final plan. Little Lakes Basin is now included in the mapping of the relevant Sustainable Recreation Management Area.

2033

"Mammoth Escarpment Place" should be replaced with a name that references the Mammoth Lakes Basin, as this is the geographic feature that most residents and visitors recognize.

Upper and Lower Rock Creek are currently lumped into the "Bishop to Convict Creek" Recreation Place, but are of particular importance to southern Mono County and should have their own place names and geographic boundaries as well.

The Lakes Basin should have its own set of desired conditions.

Response: The Recreation Places section of the final plan has been replaced by a section called “Sustainable Recreation Management Areas,” which can be found in chapter 3 of the final plan. The Mammoth Lakes Basin and Upper and Lower Rock Creek areas are included within the “Destination Recreation Area” section. There are specific plan components, including desired conditions, for this management area (MA-DRA-DC).

2034

Suggestions for changes and additions for descriptions of several recreation places are provided.

Response: The “Recreation Places” section has been replaced by “Sustainable Recreation Management Areas,” which can be found in chapter 3 of the final plan. See response to issue 2036.

2035

Within recreation places, consider designating special recreation management areas to address specific areas where many different recreational uses are concentrated.

Develop plan components for these special management areas. Specific examples for Mammoth Lakes region and Craters/Shady Rest Area.

Response: The "Recreation Places" section has been replaced by "Sustainable Recreation Management Areas," which can be found in chapter 3 of the final plan. These management areas address differences in recreation opportunities and settings across the Inyo National Forest. The Mammoth Lakes area, including the Craters and Shady Rest Area, are included in the "Destination and General Forest Recreation Management Areas." Plan direction has been developed for these management areas and can be found in the final plan in chapter 3, "Sustainable Recreation Management Area" section.

2036

The plan needs to incorporate public input so that the names, geographic boundaries and descriptions of these recreation places resonate with the local communities and other stakeholders.

Response: The "Recreation Places" section has been replaced by "Sustainable Recreation Management Areas," which can be found in chapter 3 of the final plan. These areas now better define recreation opportunities and settings by recreational uses and level of development and can be located by known geographic names and boundaries (final plan, appendix a, figure 16).

2037

In Chapter 3 of the final plan, Management Strategy section for Mono Basin –Lee Vining Place include Tioga Pass in the title or add Tioga Pass as its own place; and Include boating/water activities, birding and photography (as above) in the values list.

Response: The "Recreation Places" section has been replaced by "Sustainable Recreation Management Areas," which can be found in chapter 3 of the final plan. The Tioga Pass area has been designated a Destination Recreation Area and plan components are provided in the final plan, chapter 3, "Sustainable Recreation" section. The list of values for this area includes water access.

2038

Mono Basin Scenic Area Interface: The plan is too vague with respect to how the Mono Basin National Forest Scenic Area management plan will interface with the larger Inyo Forest Plan. The language should be clear that when the scenic area management plan provides more restrictive or nuanced management direction, it supersedes the Forest Plan within the designated area.

Response: In chapter 3: Area-specific Desired Conditions and Management Direction, under the "Designated Areas" section, the introduction states that "Where multiple designated areas overlap, the designated area with the most restrictive plan components must be followed." This includes the direction provided in the Mono Basin National Forest Scenic Area Comprehensive Management Plan (USDA Forest Service 1989).

2039

Environmental Education/Interpretation.

The plan does not recognize the Lee Vining Canyon Scenic Byway as an interpretive opportunity. The plan should include interpretive displays and opportunities provided along the Lee Vining Canyon Scenic Byway.

Response: Interpretation plan components are provided for in the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan (chapter 2). Although the plan does not list specific areas that interpretation should occur, the direction in the plan does not prohibit interpretation occurring along the 395 Scenic Corridor, Lee Vining Canyon Scenic Byway or within the Mono Lake National Scenic Area.

2040

The Tribe sees a need for more rangers.

Response: The presence of more rangers (including law enforcement officers, wilderness rangers and other forest personal) is not controlled or managed by the forest plan. The filling of these positions is directed by the President's budget, which determines annual appropriations to the Forest Service, as approved by Congress.

2041

The plan does not appear to propose significantly better access to educational materials, displays, museums or classes. Also, the plan does not appear to propose significantly better access to educational opportunities. The Tribe suggests educational opportunities should be promoted, such as through a nature center or two located in convenient proximity of the Inyo National Forest, because such establishments may create more respectful users of the resources.

Response: The plan includes general direction to engage with the public in support of plan objectives, including interpretation and education opportunities related to culture and history (for example, CULT-FW-DC-03, all LOC-FW-DC). Such direction would guide future project-level analysis related to the development of additional visitor centers if the need is identified. Forest plans are intended to be strategic and to identify long-term or overall desired conditions, and to offer general rather than prescriptive direction for achieving those desired conditions.

2042

The term "discontinuation" is used in several places in regards to recreation residences and is confusing. It appears to be a carryover from previous plans and should be removed from p. 72 as it relates to discontinuation of permits.

Response: The use of the team "discontinuation" in regards to recreation residences was in error in the draft plan and has been removed from the final plan.

2043

Chapter 1: Introduction. a. The discussion of recreation uses should include birding, as well as water sports, such as kayaking, standup paddling, rowing, sailing and swimming. b. Further define the role of recreation in the local economy; for example, what percentage of the local economy derives from forest recreation. c. Describe the economic role of the Inyo National Forest in the region, not just in terms of visitation

but also as one of the largest employers providing many of the few benefitted year-round jobs in the area as well as seasonal employment.

Response: The distinctive roles and contributions of the Inyo National Forest, as described in chapter 1, do not include a comprehensive list of all the activities that occur across the Inyo. The activities listed in chapter 1 are those that are the most popular from visitor use data (final environmental impact statement, "Sustainable Recreation" section, chapter 3). The importance of recreation to the local economy from activities and opportunities on the Inyo National Forest are presented in the final environmental impact statement, Economic Conditions, Key National Forest Contributions section, and final environmental impact statement, Economic Conditions, Important Inyo National Forest Contributions to Inyo County section.

2044

Chapter 3: Management Strategy: b. Also apply here the potential management approaches described in the "Pacific Crest National Scenic Trail" section.

Response: It was unclear where the commenter wanted the Pacific Crest National Scenic Trail potential management approaches to apply to. These potential management approaches can be found in the "Designated Areas" section of chapter 3 of the plan.

2045

Chapter 3: Management Strategy: e. Sustainable Recreation (p. 94): Why are Nordic trail users singled out for providing information on seismic risks?

Response: The potential management approach providing information to Nordic trail users on landslides and seismic processes was in error and has been removed from the plan.

2046

Appendix D. a. 4. Direct Action. Extend the seasonal operation of campground facilities (spring and fall) to reduce the impacts of dispersed camping on undeveloped areas.

Response: Appendix D: Management Strategies for Resolving Recreation Resource Conflicts has been removed from the plan. The final plan, "sustainable recreation" section, desired conditions (chapter 2, REC-FW-DC) has a possible management strategy that addresses the need for flexibility in the opening and closing of facilities, rather than being on a fixed administrative schedule.

2047

Recreation. The plan should 1) include clearer plans to address deferred maintenance of recreational facilities, 2) provide better visitor education and interpretation so that all visitors better understand how to act responsibly, 3) manage all our remaining roadless areas to protect their wild, non-motorized character and 4) provide for both summer and winter recreation opportunities for forest visitors.

Response: Forestwide sustainable recreation plan components have been added that address deferred maintenance, such as REC-FW-OBJ 04, which provides a measure for our staff in working with partners to address 25 percent of the deferred maintenance on the Inyo over the next 10 years. This objective is also provided for in the "Volunteers, Interpretation, Partnership and Stewardship" section of the plan: VIPS-FW-GOAL 07.

Recreation plan components have been developed for addressing education and interpretation (final plan, REC-FW-DC10; REC-FW-GOAL 02 and 04; REC-FW-GDL 09) and the forestwide

sustainable recreation potential management approaches. Education and interpretation direction can also be found in the "Volunteers, Interpretation, Partnerships and Stewardship" section (VIPS-FW-DC 02 and 03; VIPS-FW-GOAL 06) and potential management approaches.

Inventoried roadless areas have been included in two areas in the plan. The White Mountain, South Sierra and Piper Mountain recommended wilderness additions include inventoried roadless areas and will be managed following plan direction in the "Recommended Wilderness" section of the plan. The majority of the remaining Inventoried Roadless Areas have been included in the Challenging, Backroad Recreation Area. Plan direction for this area includes maintaining the low density of roads and trails and the remote settings of these areas (MA-CBRA-DC 01-08). Management direction for Inventoried Roadless Areas under the Roadless Area Conservation Rule (36 CFR 294) will continue under this plan.

The sustainable recreation section of the plan provides for summer and winter recreation opportunities, as stated in the REC-FW-DC 01, where the Inyo National Forest will offer a variety of recreation settings for a broad range of year-round recreation opportunities.

2048

Page 9 lists the recreation opportunities for the Inyo, and snowmobiling is not listed but is a significant use in some parts of the Inyo. This is incorrect and should be added.

Response: Appendix D: Management Strategies for Resolving Recreation Resource Conflicts has been removed from the plan because the management strategies for addressing conflicts between recreation uses, and sensitive resources are addressed by recreation plan components (REC-FW-DC04, 07 and REC-FW-GDL 02, 05, 07 and 13). Snowmobiling is listed as a recreation opportunity within the "Distinctive Roles and Contributions of the Plan Area" section (final plan, chapter 1).

2049

It is important that our public lands be available to the public for recreation, which is so important to our economic future of Mono County and other counties, and to protect watersheds, view sheds, plants and animal wildlife.

Response: We recognize the importance of recreation, especially the economic benefits to local communities. This has been reflected in the "Economic Conditions" section of the final environmental impact statement ("Benefits to People, Economic Conditions" section). Plan components also provide for the sustainability of recreation (final plan, REC-FW-DC 01-13) and the integration of recreation use in protecting scenery (SCEN-FW-DC 01-04 and SCEN-FW-OBJ 01), plants and animal habitats (MA-RCA-STD 06 and 08).

2050

The plan need to add language to address the potential closure of the car-accessible campground north of Kennedy Meadows in the Inyo National Forest. It has been threatened with closure due to deferred maintenance. Like many small communities along the Pacific Crest Trail, Kennedy Meadows and its general store, are an important way station for the thousands of hikers who pass through there every year and provide early-season "tourist" revenue to the establishments in this community.

Response: Decisions on a site-specific scale are not included within forest plans, as a plan does not authorize projects or activities or commit the Forest Service to take action (36 CFR 219.2 (2)). The sustainable recreation plan component that speaks to desired conditions of recreation

facilities (REC-FW-DC-02) and the forestwide guideline (REC-FW-GLD-03) identifies when we will consider decommissioning facilities.

2051

The Buttermilk area is currently identified as a dispersed recreation area. This should be reclassified, as the use in this area does not meet the definition of dispersed.

Response: The Buttermilk area has been re-classified under the general recreation area (final plan, chapter 3). Within this area there are limited amenities, fewer signs and minor development (MA-GRA-DC 01), and this area also offers opportunities for expansion of recreational opportunities (MA-GRA-DC 07).

2052

Add a desired condition: *The Inyo National Forest visitor centers should be considered as developed recreation facilities. An annual maintenance and capital investment plan should be established in order to identify important repairs and improvements to be made in order to preserve the cleanliness and operating functionality of these important facilities.

Response: The Inyo National Forest visitor centers are considered recreation facilities. Forestwide plan components that address facilities (chapter 2, sustainable recreation) include visitor centers. Funding to support facilities comes out of our annual budget from the Washington, DC office via the Forest Service Pacific Southwest Regional Office, which is based on annual appropriations from Congress. The Inyo has a Facilities Master Plan, which identifies future disposition of buildings and can identify major repairs that are needed and/or desired capital improvement projects at each site. When capital improvement funding is available within the region, Inyo National Forest staff submits project proposals and competes with 17 other national forests for limited funding. Funding is determined by looking at health and safety concerns first.

2053

A desired condition needs to be added as follows: The Inyo National Forest works collaboratively with Eastern Sierra Interpretive Association and other non-governmental organizations to develop consistent training opportunities for seasonal and year-round staff that integrate visitor needs, changing conditions and important interpretive and safety information into the training curriculum.

Response: We added language to VIPS-FW-GOAL 08 (final plan, chapter 2) that addresses the need to provide consistent training to all partners who are engaged in educational or outreach programs. This would include staff working at the visitor centers.

2054

Ski Area.

The forest plan should include language from the Ski Area Recreational Opportunity Enhancement Act of 2011 (text provided in comment).

Response: See comment 2095.

2055

The forest plan should address rails to trails projects for the two abandoned railroads tracks on the Inyo National Forest.

Response: Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. The plan does not prohibit a project to move the abandoned railroads into trails. Plan direction sets the foundation for these types of projects under (final plan, REC-FW-DC 01 and 12). A proposal such as this would require site-specific planning.

2056

Add the following plan objectives under sustainable recreation -- New: Within 5 years of plan approval, add 100 miles of new mixed use trails (hiking, running and mountain biking) with a maintenance partnership for ensuring trails meet standard. New: Within 5 years of plan approval, add a minimum of five new trailheads in the front country to disperse recreational activity (hiking, biking, stock, off-highway vehicles and over-snow vehicles), including maintenance and management partnerships for new facilities. New: Within 10 years of plan approval, add new dispersed camping site opportunities through special use permits and partners to add a minimum of 300 new sustainable sites.

Response: The 2012 Planning Rule requires that the plan objectives must be achievable and based on reasonably foreseeable budgets.

A proposal such as this would require a site-specific planning effort, but could potentially be addressed in a separate environmental review under the National Environmental Policy Act.

2057

Plan direction needs to be revised. It should include in the vision a provision(s) describing the preference to recruit locally for seasonal and permanent positions as well as source locally for equipment and supplies

Response: Hiring procedures and policies are not within the authority of a forest plan, but the plan does provide a goal in the “Volunteers, Interpretation, Partnerships and Stewardship” section that aims to maintain and expand contracting and partner opportunities with local governments, businesses and organizations (final plan, VIPS-FW-GOAL 03).

Tribal Comments

2058

The Tribe finds the language in Inyo National Forest Plan is vague, and even though there is more substance in the draft environmental impact statement, it is difficult to discern what, exactly, the Forest Service plans to do in the coming years or decades or where it will begin.

Response: Forest plan direction, as defined in the 2012 Planning Rule, does not authorize projects or activities or commit the Forest Service to take actions (36 CFR 219.2 (2)). Forest plans outline the vision (desired conditions), objectives (how the Inyo will move toward attaining desired conditions) and the framework to apply when attaining the objectives (standards and guidelines). The plans do not get at the “how” an activity would be completed; that’s determined at the project level. The plan provides for objectives for multiple resources found in the following sections: WTR-FW-OBJ, TERR-FW-OBJ, SPEC-SG-OBJ, INV-FW-OBJ, REC-FW-OBJ, SCEN-

FW-OBJ, TIMB-FW-OBJ, CULT-FW-OBJ, MA-CW-OBJ, MA-RCA-OBJ, RCA-MEAD-OBJ, RCA-RIV-OBJ and MA-GRA-OBJ. Appendix B: Proposed and Possible Actions also outlines the practices we will take over the next 3 to 5 years to implement the plan.

2059

The degree to which the Forest Service will commit personnel or dollars, what the schedule is for accomplishing all of the objectives, and how objectives stand with regard to each other in terms of priority is not obvious in this document that calls itself a plan. For example, one "potential management approach" for an area identified in the Inyo National Forest Plan as a critical aquatic refuge, p. 64, fails to provide a commitment. It says, "Recommend restoration practices in: (1) areas with compaction in excess of soil quality standards; (2) areas that have lowered water tables; or (3) areas that are actively down cutting or that have historic gullies. Identify management practices such as road building, recreational use, grazing and timber harvest that may be contributing to the observed degradation." The reader is presented with the environmental problems, but then realizes that no steps for correction are mentioned. This sort of verbiage is pervasive throughout the documents.

Response: The 2012 Planning Rule establishes that plan objectives should be based on reasonably foreseeable budgets (36 CFR 219.7 (1)(iv)). Objectives in the plan are not necessarily ranked by priority, as that is determined by the Inyo staff and can change from year-to-year. We are required to meet the objectives as outlined by the timelines stated in these components. Forest plan direction, as defined in the 2012 Planning Rule, does not authorize projects or activities or commit the Forest Service to take actions (36 CFR 219.2 (2)). Forest plans outline the vision (desired conditions), objectives (how the Inyo will move toward attaining desired conditions) and the framework to apply when attaining the objectives (standards and guidelines). The plans do not get at the “how” an activity would be completed; that’s determined at the project level.

2060

The Tribe is concerned about the level of resources (personnel, funding, etc.) required to manage the Inyo National Forest now, let alone according to the objectives of the plan. The Tribe suggests the Forest Service and its advocates need to go to Congress or other powers-that-be and argue for funding sufficient to accomplish goals and objectives to manage the forest for the long term.

Response: 18 U.S.C. 1913 prohibits executive branch agencies to use appropriated funds for activities that directly or indirectly are “intended or designed to influence in any manner a Member of Congress, to favor or oppose… any legislation or appropriation by Congress.” The Forest Service Pacific Southwest Regional Office provides information to USDA regarding base funding levels. The President’s budget determines annual appropriations to the Forest Service. The 2012 Planning Rule requires an agency official to ensure plan components are within the fiscal capability of the unit and elements of the forest plan are considered achievable based on current and future anticipated appropriations.

2062

The Tribe agrees with the wilderness designations of alternative B, and also sees that the additional proposed wilderness areas (shown, for example, in map 22 of volume 3

of the draft environmental impact statement) have merit and should be considered in this round of planning.

Response: The additional potential recommended wilderness areas illustrated on map 22, volume 3 of the draft environmental impact statement were considered in the planning process under the analysis of alternative C. The rationale for the decision related to selected recommended wilderness areas is explained in the "Preliminary Administrative Recommendations" section of the record of decision.

2063

The Tribe understands that none of the proposed areas (in B or C) would result in road closures. When the forest manages an area as wilderness, certain types of development which the Tribe often finds itself opposing (such as renewable energy facilities or telescope projects) are automatically prohibited, so managing as wilderness has benefits for the Tribe.

Response: There are no existing system roads or motorized trails in any Inyo National Forest recommended wilderness area, and thus no roads would be closed. It is important to clarify that recommended wilderness areas would not be managed as wilderness unless so designated by future Congressional action. Recommended wilderness would be managed as described in chapter 3 of the plan. Projects and activities would need to meet standards and suitability criteria designed to achieve the desired future condition of recommended wilderness areas, including prohibitions on new energy developments or leases, prohibitions regarding the construction of permanent improvements and restrictions on motorized use of system roads and trails (final plan; for example, RA-RWLD-STD-03, MA-RWLD-SUIT-06, MA-RWLD-SUIT-02).

2064

The Tribe would wish to ensure that nearly all traditional cultural practices may continue in designated wilderness, such as hunting and collecting certain resources and engaging in certain ceremonial practices.

Response: There is no reason to restrict traditional Tribal cultural practices that are compatible with the attainment of desired conditions, standards, suitability criteria and goals for recommended wilderness areas. As described in chapter 3 of the plan, it is desirable for plant and animal communities to remain substantially natural and ecological processes to be generally absent from human intervention in recommended wilderness. Commercial harvest of non-timber forest products and developed recreation sites also are not considered suitable in these management areas. There are no prohibitions, however, on the collection of non-timber forest products for personal use or on social gatherings or uses conducted in such a manner that wilderness character is preserved. The forest plan also includes no prohibition on hunting or fishing in recommended wilderness, but these activities are regulated by the California Department of Fish and Wildlife.

2065

Fire Management.

There should be more specific plan direction on a scientific approach and through partnerships to deal with invasive plants and fires to restore resilience to desert

shrublands, pinyon-juniper woodlands and even perhaps high elevation trees are more vulnerable to stand-altering fires.

Response: A goal (final plan, FIRE-FW-GOAL 08) has been added to the plan to stress the role of research and partnerships in generating the knowledge to achieve desired conditions in ecosystems that are experiencing more frequent, larger and/or more severe fire than the natural range of variability due to factors such as non-native annual grasses and changing climate. This goal also acknowledges that we do not currently have adequate management options to restore the fire regime in these ecosystems. Other plan components also contribute to this goal, including a goal that was added to develop a strategy for managing non-native invasive grasses with partners (INV-FW-GOAL 04), as well other plan components including TERR-FW-GOAL 01 and INV-FW-GOAL-03, which says "Coordinate with research and other organizations to evaluate the potential effects of climate change on the spread of invasive, non-native species."

2066

Shared Stewardship versus Partnerships.

Plan direction needs to be strengthened beyond partnerships to encourage opportunities for working with Tribes and other adjacent agencies (BLM) on resource management. The nearby tribes are sovereign nations entitled to government-to-government relations. The word "partnership" needs to be elevated for Tribes. This would enhance the ability of Tribes to secure other funding to help achieved objectives in the plan that also addresses Tribal interests.

Response: We consult and coordinate with both federally recognized Tribes with whom we share a government-to-government relationship, as well as with unacknowledged Tribal groups. Tribal references in the plan are broadly stated so as to be inclusive of these varied relationships. The elevated importance of these Tribal relationships is acknowledged in a dedicated section of the plan ("Tribal Relations and Uses") and by the inclusion of Tribal coordination and shared stewardship in numerous other topic areas ("Volunteers, Interpretation, Partnerships and Stewardship," "Lands," "Sustainable Recreation," "Cultural Resources, Fire and Terrestrial Ecosystems" and "Vegetation"). These plan sections include a large number of Tribal-related desired conditions, goals, objectives and guidelines that establish a clear demonstrated purpose that will be useful in supporting a wide variety of proposed future projects, collaborative efforts and funding requests (for example, a goal to implement 1-5 restoration or maintenance actions to enhance resource availability for traditional Tribal collection activities, TERR-FW-OBJ-03). The plan also articulates a vision for expanding opportunities to work with a wide variety of partners, including local adjacent agencies such as the BLM ("Volunteers, Interpretation, Partnerships and Stewardship" and Appendix C).

2067

Partnerships

Plan direction on partnerships needs to be revised to make it clear that these are considered carefully and not just made for economic reasons or to exert more influence.

Response: The development of partnerships is outlined in the "Volunteers, Interpretation, Partnerships and Stewardship" section of the final plan (chapter 2) and includes plan components that address the need to develop partnerships for a multitude of benefits, such as, providing additional capacity, educational opportunities and restoration (VIPS-FW-DC 01-06). These partnerships can be for economic benefits to the Inyo. Appendix C: Renewed Partnership Focus

for the Inyo National Forest outlines how we would develop partnerships and for what purposes partnerships are needed.

2068

Environmental Education and Tribal Interests.

The tribe would like to see the plan strengthened in the direction to provide opportunities to engage visitor and the public in ways to support achieving the plans objectives. This would be to create visitor centers that present a wide range of information, including Native American and Tribal culture and interests.

Response: The plan includes general direction to engage with the public in support of plan objectives, including interpretation and education opportunities related to culture and history (for example, CULT-FW-DC-03, LOC-FW-DC). Such direction would guide future project-level analysis related to the development of additional visitor centers if the need is identified. Forest plans are intended to be strategic and to identify long-term or overall desired conditions, and to offer general rather than prescriptive direction for achieving those desired conditions.

2069

Soil and Water Protection.

The plan language is vague regarding direction on soil and water protection. An example is Potential Management Approaches for CARS. Potential problems are identified to address but there are no steps for corrective action mentioned.

Overall, the plan is conceptual in many areas, and it is difficult to determine what will actually happen. The plan needs to be revised to be more concrete.

Response: Plan direction for soil and water can be found in the following sections: “Watersheds,” “Conservation Watersheds” and “Riparian Conservation Areas.” Forest plan direction, as defined in the 2012 Planning Rule, does not authorize projects or activities or commit the Forest Service to take actions (36 CFR 219.2 (2)). Forest plans outline the vision (desired conditions), objectives (how the Inyo will move toward attaining desired conditions) and the framework to apply when attaining the objectives (standards and guidelines). The plans do not get at the “how” an activity would be completed; that’s determined at the project-level. Appendix B: Proposed and Possible Actions also outlines the practices we will take over the next 3 to 5 years to implement the plan.

Inyo County Specific Comments

2070

Analysis of Inyo General Plan not adequately reviewed and analyzed.

Inyo County’s General Plan and priorities and other jurisdictions' planning documents were not adequately reviewed by the forests as required by the National Environmental Policy Act, and an analysis of these plans and policies was not included in the draft environmental impact statement. The treatment of these local plans and priorities was to list them and provide responses that effectively stated they were addressed, mostly in other plans and forest management manuals. Understandably, the forests cannot make every local jurisdictions' plans and policies part of the forest plans; it would, however, have been more genuine if the forests had at least found certain policy elements that the jurisdictions had in common and used them to either limit or

increase/add certain activities or recognize these goals and policies as important in the forest plans.

Response: We reviewed and considered all the general management plans for Inyo, Mono, Madera and Tulare Counties in California and Esmeralda and Mineral Counties in Nevada. Appendix H of the final environmental impact statement displays the management direction for all these county plans and how those are covered by plan components in the forest plan, or how they were incorporated into plan components in the forest plan. The forest plan can only include direction for which the Inyo National Forest has management jurisdiction.

2071

Need to check table 7 and figure 14, appendix A.

Response: The information in the "Recreation Opportunity Spectrum" table (final plan, chapter 2, Social and Economic Sustainability and Multiple Uses, "Sustainable Recreation" section) has been updated to reflect the correct acres of the Recreation Opportunity Spectrum classes. The recreation opportunity spectrum maps in the final plan have also been updated.

2072

Chapter 3, Management Strategy, d. Local Communities (p. 89): Add a provision requiring consultation with and reference to local planning documents, such as county general plans and other local planning documents.

Response: Current regulations already provide for review of local planning documents and require notifying interested parties on Forest Service activities. Code of Federal Regulations for the National Environmental Policy Act requires scoping to be conducted for all Forest Service proposed actions (36 CFR 220.4(e)(1)). These regulations further state that the lead agency shall invite the participation of affected Federal, state, and local agencies (40 CFR 1501.7); this includes county governments. The agency is also responsible for notifying the public of the availability of environmental documents and soliciting appropriate information from the public (40 CFR 1506.6). Furthermore, the plan provides for the development of a partnership culture that allows for continued cooperation with local communities (VIPS-FW-DC, VIPS-FW-GOAL, potential management approaches, and Appendix C: A Renewed Partnership Focus for the Inyo National Forest).

2073

The Inyo National Forest draft plan needs to add language to better protect Inventoried Roadless Areas from unauthorized off-highway vehicle use.

Response: Direction for inventoried roadless areas is in the 2011 Forest Service Roadless Rule (36 CFR 294 Subpart B), and is not repeated in this plan. Enforcement of uses on public lands is regulated through specific forest orders, or other laws, regulations or policies. The Inyo National Forest 2009 Travel Management Decision designated which roads were authorized for public use, and 36 CFR 261.13 prohibits use of a motor vehicle on National Forest System lands other than in accordance with those designations. The plan does not need to include management direction for these prohibited uses because it already exists in other regulations.

2074

The cumulative impacts from all past decision documents, together with plan revision, was not adequately addressed with regard to impact on losses to grazing and certain recreation opportunity types. These past decisions include the travel management plan,

all the endangered species habitat plans, past wilderness designations and past wilderness recommendations/study areas that are still being addressed.

Response: The final revised plan is not expected to result in changes to the types of recreational opportunities available on the Inyo National Forest. There are also no expected changes to grazing use on the Inyo as a result of the final revised plan. The final revised plan does have the potential to result in cost increases for current grazing allotments that are located within the areas recommended for consideration for wilderness. However, there are no expected cost increases to these grazing allotments associated with past decisions. Therefore, no additional cumulative effects to recreational or grazing use are expected.

Mono County Specific Comments

2075

Complex Jurisdictional Issues.

Key excerpts from the general plan are included in the body of this comment letter, and in attachment 1. In particular, attachment 1 contains policies specific to local communities that are important to forest management and should influence the draft plan. The strategic plan interfaces with the draft plan particularly in the areas of environmental sustainability and strengthening the economic base. These complex issues cross jurisdictional lines across the landscape, demonstrating that the forest and county have a critical and vital relationship.

Response: The plan contains management direction addressing the importance of forest management to the sustainability of county economies. This direction is found in LOC-FW-DC 02 and 03 and LOC-FW-GOAL 01, 02, 03 and 04. Plan components in the "Ecological Sustainability and Diversity of Plan and Animal Communities" section of chapter 2 in the plan addresses environmental sustainability and is consistent with the general plan for Mono County. We reviewed and considered all the general management plans for Inyo, Mono, Madera and Tulare Counties in California and Esmeralda and Mineral Counties in Nevada and determined that the plan does interface with the Mono County environmental sustainability and economic base of their general plan (final environmental impact statement, volume 2 appendix H).

2076

Mono County understands the draft plan was written within the context of existing and anticipated future funding. While the county recognizes the practical nature of this constraint, we urge the Inyo National Forest to plan for and manage to the greater vision of the forest. Mono County, as a stakeholder and partner, commits to advocating for funding at the federal level to help ensure success of the plan.

Response: Although the plan's objectives and other plan components (standards and guidelines, goals) adhere to the planning rule's direction of ensuring our plan is based on reasonably foreseeable budgets (36 CFR 219.7 (1)(ii)), the desired conditions of the plan are the vision for the Inyo National Forest to manage toward over the long-term.

2077

Proposed and Possible Actions.

Appendix B: Proposed and Possible Actions, appendix b of the draft plan, contains a level of detail that more directly affects stakeholders and local communities, but these can be modified at an administrative level. Mono County requests that the Inyo National

Forest conduct outreach with local communities prior to any changes, and as needed, when these actions affect local communities as applied to specific projects.

Response: Appendix B: Proposed and Possible Actions within the plan adheres to the 2012 Planning Rule, in that this "information is not a commitment to take any action and is not a "proposal" as defined by the Council on Environmental Quality (CEQ) regulations for implement NEPA (40 CFR 1508.23, 24 U.S.C. 4322(2)(c))" (36 CFR 219.7(f)(1)). Any projects that are derived from this appendix would be subject to the CEQ NEPA regulations as identified above.

2078

Alternative B and Priorities.

Mono County generally supports alternative B with modifications, which are further detailed in this letter by topic. The county is particularly interested in partnerships and stewardship of the land, and particularly concerned about wildfire risks and management across the landscape.

Response: We have more specific, detailed responses to Mono County's modification requests in the following responses (2079-2112). Alternative B is highly focused on partnerships, as explained throughout the final plan, and particularly in appendix C, "A Renewed Partnership Focus for the Inyo National Forest."

The preferred alternative was designed specifically to address wildfire risks and management across the landscape, as well as forest health associated with wildfire risk. We identified fire management as revision topic 1, and analyzed effects from all alternatives on fire hazard, fuels, air quality and other related topics in the "Revision Topic 1 - Fire Management" section of the final environmental impact statement. Further, the strategic fire management zones were altered in the final plan to address concerns brought forward from public comments, including those from Mono County, and to better reflect conditions on the ground.

2079

Land Adjustments and County Coordination.

(Eastern Sierra Landownership Adjustment Project) 5 A policy recommendation in the final document for the Inyo National Forest reads as follows: 4.2.1 General LRMP Recommendations: Add a policy to the Land and Resource Management Plan (LRMP) committing to early engagement of the communities in landownership adjustment efforts. The communities are very concerned about being informed and able to provide input to influence the process (p. 68). The county would appreciate incorporation of this language, both to accommodate community concern and validate the interagency cooperation of the planning effort.

Response: Regulations already exist that require land ownership adjustments to notify local governments early in the process (36 CFR 254.8), and therefore the direction was not repeated in this plan. However, we captured the substance of the Mono County Plan direction under Lands Desired Conditions (LAND-FW-DC 02), "Coordination of land and resource planning efforts with other federal, state, tribal, county and local governments, and adjacent private landowners, promotes compatible relationships between activities and uses on National Forest System lands and adjacent lands of other ownership."

2080

Recreation Residences.

The county would like to see management direction supporting not only the continued availability of recreation residences, but their use for permanent residents. Policies in the Housing and Land Use Elements of the Mono County General Plan support these recreation residences (see attachment 1), and identify them as an economic benefit and important for meeting housing needs in the county by providing housing stock.

Response: As per agency policy (FSH 2720), recreation residences in the national forests were established to provide a forest recreation experience. It is mandatory that a recreation residence not be used as a principal place of residence by a holder. A holder cannot use the cabin as a place from which to routinely commute to work on a full-time basis, nor can they conduct business from a recreation residence. We understand the scarcity of housing in Mono County. The Forest Service mission does not include providing permanent housing on national forest land, except when needed for administrative purposes such as limited government housing. The economic contributions from recreational residences from tax revenue generation to support important county services have been added to the final environmental impact statement, under "Economic Conditions – Local Fiscal Conditions."

2081

More specific direction at species scale.

Mono County's concerns are that the draft plan focuses primarily on descriptions of the structure and function of ecological zones and/or dominant vegetation types, and that more specific standards, guidelines and management direction may be needed at the species scale.

Response: According to the 2012 Forest Service Planning Rule (35 CFR 219.9), forest plans should include components to maintain or restore the ecological integrity of ecosystems and watersheds, habitats and animal communities. The responsible official then determines whether those plan components provide the ecological conditions necessary to protect federally listed species, candidate species and species of conservation concern, and if more species-specific components are required. The final plan follows the required direction, and does have multiple desired conditions, goals, guidelines and management approaches for ecosystems, habitats and animal communities, and also species-specific direction for those species found to warrant further direction. In the final plan, those species include bi-state sage grouse, great gray owl, bighorn sheep, Sierra marten, California spotted owl, Lahontan cutthroat trout, Paiute cutthroat trout, golden trout, Yosemite toad and yellow-legged frogs (chapter 2, Ecological Sustainability and Diversity of Plant and Animal Communities, "Animal and Plant Species" section).

2082

At-risk Species.

Mono County has a specific interest in maintaining healthy and viable populations of at-risk species to reduce the potential for Endangered Species Act (ESA) listings. We rely on the technical expertise of the Forest Service, and specifically the Inyo National Forest, to ensure management direction is sufficiently robust to retain healthy and viable populations.

Response: See response to 2081.

2083

Threats to species at-risk in draft environmental impact statement.

The draft environmental impact statement lists the plan components addressing the identified potential threats to at-risk terrestrial wildlife species, aquatic species and plants in tables 83, 90 and 99. These components appear very broad and are difficult to locate in the draft environmental impact statement, which could result in inadequate application of protection measures simply because the draft plan is fragmented and difficult to use. A clearer relationship in the draft plan between specific at-risk species and their associated management direction, more-specific plan components for specific species, and cross-referencing draft environmental impact statement information in the draft plan could be helpful.

Response: See response to 2081.

In addition, the plan has been reorganized and lays out all the plan direction (desired conditions, objectives, goals, standard, guidelines and potential management approaches) for each resource topic, including animal and plant species. This makes it easier to find all the plan direction related to individual species.

2084

Habitat Connectivity.

Habitat connectivity for wide-ranging forest species (bear, deer, and fisher) and sagebrush obligate species (sage-grouse and other sagebrush-dependent species) is analyzed in the draft environmental impact statement (pp. 205-207); however, the relationship to plan components and management direction to maintain or improve connectivity should be made clearer.

Response: See response to 7019.

2086

Invasive Species.

Invasive species have increasingly been coming to the attention of the Mono County Board of Supervisors. The draft plan appears to address preventing the spread of invasive species, but specific direction and management for treating and eradicating established (whether current or future) invasive species appears to be lacking. Again, we rely on the technical expertise of the U.S. Forest Service and Inyo National Forest to ensure management direction sufficiently addresses removal of invasive species.

Response: The plan includes several components guiding treatment of invasive species (INV-FW-DC-01; INV-FW-OBJ-01, -02; INV-FW-GOAL-01, -02; INV-FW-GDL-01, -02 and Potential Management Approaches for Invasive Species). Any site-specific treatments or management actions by Inyo National Forest personnel would be consistent with forest plan direction and would be further analyzed at the project level.

2087

Mono County would like to see standards and guidelines for potential energy corridors, including requirements for compatibility with scenic integrity objectives and ecological integrity within the limits of other laws. The Conservation/Open Space Element of the

Mono County General Plan specifically opposes commercial-scale energy generation with adverse impacts on public lands, as follows:

Policy 11.A.3. Oppose commercial-scale (e.g., >3MW) solar and wind energy projects in Mono County on non-county public lands,

Action 11.A.3.a. Where pre-empted by state law or other jurisdictional authority, work with applicable agencies to avoid, minimize, and mitigate impacts to the environmental, visual, recreational, wildlife habitat and noise environment within the county.

Action 11.A.3.b. Ensure (or for non-county public lands advocate) for no adverse project impacts to the visual, recreational, and noise environment in Mono County.

Action 11.A.3.c. Ensure (or for non-county public lands advocate) for no adverse project impacts to biological resources and wildlife habitat in Mono County, including sage grouse habitat and wind energy development impacts to migratory birds.

Response: We will continue to cooperate with the Mono County and the BLM in the planning of energy/utility corridors, as stated in the Mono County Plan – Conservation and Open Space Element – Goal 7, Objective A, Action 1.5

Any development of energy facilities would require project-scale environmental analysis and would comply with the forest plan.

2088

Input the county can offer on the sustainable recreation discussion is the following point: Space and opportunity should be sufficiently provided for all recreational users.

Response: See response to issue 8318.

2089

Mono County supports many of the points provided by the Eastern Sierra Recreation Collaborative "Citizen Suggested Desired Conditions" document (see attachment 2), which was a citizen effort to compile public input.

Response: See response to comment 8485.

2090

The county defines "sustainable" recreation as set forth in "Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation" (June 25, 2010) and requests the Inyo National Forest plan use the same definition. This U.S. Forest Service document is a valuable resource, and the relationship between these policies and the Inyo National Forest Plan should be clear and direct.

Response: See response to comment 8406.

2091

Enforcement and education should be addressed with stronger language and commitments.

Response: The final forestwide plan components for sustainable recreation prioritize the need for up-to-date information, visitor education and interpretation (final plan, chapter 2, REC-FW-DC). Goals (REC-FW-GOAL), guidelines (REC-FW-GDL) and potential management approaches clearly address the desire and need to encourage responsible recreation through increased

knowledge and interpretation. Much of the work is dependent on developing partnerships to help educate and interact with the public.

The law enforcement program is centralized out of the Washington Office (WO).

The Inyo's law enforcement capabilities are dependent on the Washington Office budget for this program. The 2012 Planning Rule requires that the plan objectives must be achievable and based on reasonably foreseeable budgets.

2092

Minimizing impacts to resources, which also includes Native American sites, artifacts and uses, is also critical, and requires that recreation opportunities be appropriate to the landscape. Enforcement and education are key to protecting these resources.

Response: As a Federal agency, the Forest Service is required to comply with the National Historic Preservation Act (NHPA) of 1966. Section 106 of this act requires Federal agencies to take into account the effects of their undertakings on historic properties and prehistoric properties. Every undertaking (action, including recreational activities) on the Inyo National Forest must be reviewed to make sure that cultural resources are not being adversely impacted.

See response to comment 2091. Also see response to comment 2093. This response applies to dispersed recreation, but could include all recreation and that the plan includes direction to ensure that recreation does not impact cultural resources.

2093

The impacts of dispersed recreation on Native American activities, sites and uses should be recognized and managed. Horseshoe Meadows, Parker Bench, and Pizona Meadow areas are particular areas of concern.

Response: Forest plans are intended to be strategic and to identify long-term or overall desired conditions, and to offer general rather than site-specific prescriptive direction for achieving those desired conditions. The plan includes direction to ensure dispersed recreation does not impact natural and cultural resources (for example, final plan, chapter 2, REC-FW-DC-09) and to support Native American activities and practices (TRIB-FW-DC-03). This direction would guide any future project-level analysis of proposed management actions at specific dispersed recreation areas such as Horseshoe Meadows, Parker Bench and Pizona Meadow.

2094

The emphasis on sustainable recreation should include extending the recreation season into the spring and fall, or the shoulder seasons. This extension would positively affect the local economy, as well as provide opportunities to disperse recreation over a longer time frame and therefore reduce the impacts. An example of extending the season would be to keep campgrounds open longer, and base closure on weather conditions (as practical) rather than a calendar date.

Response: Sustainable recreation is year-round effort on the Inyo. A potential forestwide management approach that is included in the final plan is to work with local partners and municipalities to achieve timely opening and closing of access and facilities, rather than doing so on a fixed administrative calendar (final plan, "Sustainable Recreation" section, chapter 2, Potential Management Approach). We are keenly aware that visitation is extending into the shoulder seasons (spring and fall), yet we continue to experience the most visitation in the months

of July, August and early September. Facilities such as our campgrounds have seasonal limitations, such as water systems that have functional limitations when the temperature is below freezing. Additionally, most of our campground occupancy drastically drops after September, and very few people utilize the facilities that are available and still open. Budgets, as well as visitor preference for the prime season(s) tend to dictate how long facilities are available. With emphasis on partnerships and volunteers, there is room for new possibilities.

2095

Mono County requests the inclusion of language reflecting the Ski Area Recreational Opportunity Enhancement Act of 2011. This opportunity is particularly important to the community of June Lake.

Response: The agency must comply with all applicable laws and regulations regardless of whether it is referenced in the text of the final land management plan and environmental impact statement. Additional development may be in response to either winter or summer recreation uses as authorized by law, regulation, and agency policy including but not limited to the Ski Area Recreation Opportunity Enhancement Act of 2011.

2096

Mono County has heard concerns about the emerging issue of drone use on public land, and it should be addressed in the draft plan.

Response: We recognize that use of drones is an emerging issue nationwide. The recreational use of drones is not under Forest Service jurisdiction as the Federal Aviation Administration (FAA) has authority over all airspace. Information on FAA regulations is available at http://www.faa.gov/uas/.

The FAA regulates airspace and provides guidance on “Flights Over Charted U.S. Wildlife Refuges, Parks and Forest Service Areas” (Section 336 of Public Law 112-95), including the use of Unmanned Aircraft Systems or “Drones.” Per this guidance, federal laws prohibit certain types of flight activity and/or provide altitude restrictions over “designated Forest Service Areas.” For example, Unmanned Aircraft Systems are considered to be "mechanized” equipment and cannot take off and land in designated wilderness. Nor can they fly over or near wildlife and intentional disturbance of animals during breeding, nesting, rearing of young, etc. unless approved as research or management.

FAA guidance for recreation operations do not authorize the use of Unmanned Aircraft Systems for commercial operations on national forest land, which include filming, still photography, survey or any other endeavor for profit that involves use of a drone. These ventures would only be allowable through a special use permit issued by the Forest Service.

Individuals and organizations that fly Unmanned Aircraft Systems for hobby or recreational purposes may not operate them in areas of National Forest System lands that have temporary flight restrictions in place, such as wildfires, without prior approval from the U.S. Forest Service.

2097

Recreation places would benefit from additional review and public vetting.

Response: See response to comment 8443, which is very similar to 8466.

2098

The names, geographic boundaries and descriptions of these recreation places should resonate with the local communities and other stakeholders. In particular, "Mammoth Escarpment Place" should be replaced with a name that references the Mammoth Lakes Basin, as this is the geographic feature that most residents and visitors recognize. Upper and Lower Rock Creek are currently lumped into the "Bishop to Convict Creek" recreation place, but are of particular importance to southern Mono County and should have their own place names and geographic boundaries as well.

Response: See response to comment 8443.

2099

Within the recreation places, key locations receive more-intense visitation that results in increased impacts to resources and the visitor experience. Special management direction specific to the challenges faced at each location is needed, such as sanitary and visitor service facilities, parking and traffic management, increased enforcement and education, additional signage, etc.

Response: See response to comment 8443.

Additionally, Site specific challenges such as sanitation and visitor service facilities or parking and traffic management and law enforcement are not spelled out in a forest plan. Proposals that are site-specific would require a project planning effort, and could potentially be addressed in a separate environmental review under the National Environmental Policy Act. Many of the challenges described are services that are dependent on available budgets.

The final plan does have specific plan components regarding forest management strategies to increase our ability to address these recreation issues (final plan, chapter 2, REC-FW-DC, REC-FW-OBJ, REC-FW-GOAL, REC-FW-GDL) In the “Volunteers, Interpretation, Partnerships and Stewardship” section of the plan, desired conditions address the need to partner with multiple partners (VIPS-FW-DC). Goals (VIPS-FW-GOAL 04, 05, 07 and 09) address the need to partner for recreation benefits.

2100

The county's understanding is that the Inyo National Forest has special management designations that are not included in the draft plan because these designations were identified as not needing to be changed. However, these management designations are needed in the plan itself to provide clear policy direction. Please clarify what these special management designations are, if and how they apply, and to which areas. As an example, current restricted use areas in and adjacent to Mono County that should have special management include (Upper) Rock Creek, McGee Creek, Convict Lake, Mammoth Lakes, Reds Meadow Valley, June Lake Loop, Lee Vining Canyon, Lundy Canyon and the Ancient Bristlecone Pine Forest.

Response: It is unclear what “special management designations” are referred to in this comment. The final plan lists direction for Designated Areas, such as wilderness, the Ancient Bristlecone Pine Forest and Mono Basin Scenic Area (Sustainable Recreation, chapter 3). The areas mentioned in this comment: Rock Creek, McGee Creek, Convict Lake, Mammoth Lakes, Reds Meadow Valley, June Lake Loop, Lee Vining Canyon, and Lundy Canyon are included within the Destination Recreation Area and General Forest Recreation Areas, respectively.

2101

Several high-intensity use areas may need special management designation for increased infrastructure, maintenance, staffing, enforcement and education. Areas within Mono County needing consideration for special management designation are: Upper and Lower Rock Creek, Convict Lake, Mammoth Lakes, June Lake Loop and Lee Vining Canyon. As a specific example, the south side of Convict Lake urgently needs installation of public restrooms to deal with overwhelming use of the area by day hikers. Another area experiencing dramatic usage and change are the lands north of Mammoth Lakes, Deadman Creek, Deadman Summit and Hartley Springs areas. Off-highway vehicle use of those areas has increased so dramatically that I no longer visit those areas. With off-highway vehicle use expanding beyond those areas mentioned above, the forest plan must include increased enforcement, signage and education directed toward responsible off-highway vehicle operation.

Response: See issue responses 8443 and 2099.

2102

The Mono County Regional Transportation Plan highlights the Lee Vining Canyon Scenic Byway as an interpretive opportunity. The county would like to see interpretive displays and opportunities provided along this stunning and highly-traveled route.

Response: Interpretive displays and signage along the scenic byway are desirable projects. The forestwide goal (Final Plan, REC-FW-GOAL 06) identifies the desire to collaborate with partners to provide interpretive services. Additionally in the destination recreation management area desired conditions interpretation and education activities (which includes the Tioga Pass Corridor) are given emphasis (final plan, REC-DRA-DC-08).

2103

Film permit language currently appears in only some of the recreation places descriptions and is unclear about the types of productions that would be allowed. The county requests that the draft plan language be clarified to allow the same geographic and permitting opportunities for film productions as exist today, and remove the location-specific references in the recreation places descriptions.

Response: Filming permits are a type of special use permit. As with all special use permits, each application (proposal) is reviewed and accepted (or not) based on the specific project details, one of which is the location. The authorized officer evaluates a proposal based on the screening criteria listed in 36 Code of Federal Regulations 251.54.

Since the authorization of a filming special use permit is at the project level, it would not be appropriate to have prohibitions on locations for filming in the forest plan.

The original intent of recreation place descriptions was to provide an overview of what types of activities were typical of that place, not to suggest that a specific activity that was called out could only happen in that place.

2104

Mono County generally supports the addition of wilderness areas in the county for a variety of reasons, from increasing opportunities for quiet recreation and solitude, to

consistency with the county's "Wild by Nature" slogan, to addressing climate change impacts and species conservation.

Response: About 40 percent (343,000 acres) of the Inyo National Forest within Mono County is currently designated as wilderness. Nothing in this plan will change existing wilderness. The forest plan does not designate wilderness, which can only be done by Congress, but is required to consider whether there are areas on the Inyo suitable for inclusion in the National Wilderness Preservation System. We considered an alternative, alternative C, which analyzed roughly 93,000 acres as recommended wilderness. The preferred alternative did not include any recommended wilderness in Mono County. The rationale explaining why the forest supervisor selected specific recommended wilderness areas in the preferred alternative is included in the preliminary administrative recommendations section of the record of decision.

In the final plan, we added recreation management zones to address differing types of management needs in different forest landscapes. Roughly half of the remaining portion of Mono County on the Inyo, outside of wilderness, is in the “background recreation area”, where standards and guidelines were designed to retain low use with undeveloped, natural landscapes and challenging access. These areas of natural landscapes would retain a feel of wildness for forest users.

2105

The first concern is the exact location of boundary lines. Final boundaries of any proposed wilderness areas in Mono County should be determined based on public input, particularly about appropriate recreation opportunities, management of other activities such as grazing and fuel reduction treatments, and ecological integrity.

Response: The boundaries of the recommended polygons have been changed numerous times throughout the process, based on public input, management issues, fuel reduction needs, ecological considerations such as sage-grouse habitat, and other reasons, as requested by the commenter. The final environmental impact statement, volume 2, explains that the public had a chance to look at wilderness evaluation polygons multiple times in 2014 through 2016, and how public input affected the polygons and their descriptions. Management and other activities within polygons, along with their natural characteristics, are included in the evaluation narratives of the final environmental impact statement, volume 2, appendix B, and in the descriptions of areas analyzed in one of the alternatives. These descriptions explain how boundaries were drawn and how they may have changed in one or both of the alternatives as brought forward into the draft environmental impact statement. Through public input on the draft environmental impact statement, further changes were made to Marble Creek (polygon 1308), and area recommended in alternative C, to cherry stem a road out of the polygon.

2106

Fire Management and Wilderness.

The county is very concerned about the ability to manage fuel loading and wildfire suppression activities in proposed wilderness areas in Mono County. Given conditions may be outside the range of natural variation, a more proactive and/or active approach may be needed to ensure resiliency in order to prevent the loss of the characteristics and qualities that make them eligible for special protection, as well as preventing the spread of fire to more-populated landscapes. Providing for mechanized fuel reduction

treatments and forest health management, and fire suppression activities, therefore seems warranted even in protected areas.

Response: The Wilderness Act, section 4(b) indicates each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area. The Forest Service has identified five "qualities" that are used to assess wilderness character from statutory language of the Wilderness Act (Landres et al. 2011) including *natural quality*: The natural quality of wilderness is protected to the extent biological diversity and ecological resilience is sustained, ecosystem structure and function is maintained, and *natural disturbance processes are sustained* (for instance, lightning caused fires managed for multiple objectives including resource benefit) (final environmental impact statement volume 1, chapter 3). Proposing mechanized (fuel reduction) treatments in designated wilderness breaches the Wilderness Act and is outside the scope of the final environmental impact statement. Preferred alternative B states that 49,000 acres/decade of restoration fire related activities. While this estimate falls short of the historic natural extent of wildland fire, it strikes a balance with the need consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (final environmental impact statement – volume 1, chapter 3). All plan alternatives and objectives are based on the best available science and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments including mechanical, prescribed and wildland fire managed for resource benefit. These activities also benefit wildland urban interface communities, infrastructure and historic and cultural values at risk. Proposed alternative B also estimates and strives for 20,000 – 25,000 acres/decade of both mechanical and prescribed fire.

2107

Wilderness Evaluation and Recommended Wilderness.

Mono County requests the following areas, most of which were included in alternative c in some form and therefore meet wilderness criteria, be added to the final plan as recommended wilderness. Dexter Canyon: As proposed in alternative C (with some exceptions-see comment), Glass Mountains: the county supports a reduced area for wilderness of ~17,000 acres (see Attachment 3). This more limited area was included in the draft environmental impact statement appendix B evaluation (pages 30-33). Ansel Adams Wilderness Addition - Northeast: As proposed in alternative C, with the exclusion of Walker Lake (see comment). The Sierra Club has also suggested that an unauthorized route in Bohler Canyon should be excluded; this type of adjustment should be the product of additional public outreach. Adobe Hills: As proposed in alternative C. South Huntoon Creek: This area is missing from table 118 in the draft environmental impact statement volume I (p. 517), which appears to be an error, as it is included in table B-3 of draft environmental impact statement appendix B (p. 234). This error should be corrected. The board would like South Huntoon Creek included in recommended wilderness as proposed in alternative C. Huntoon Creek: As proposed in alternative C. Pizona-Truman Meadows: only on the portion of this polygon within California. The Nevada portion is excluded from our comments. While the county is generally supportive of including this area in recommended wilderness as proposed in alternative C, concerns about access and use by Native Americans in order to protect their heritage should be addressed. We request the Inyo National Forest conduct specific outreach to tribes on this parcel as part of the public outreach process to determine boundaries. The county would like to see these areas managed to retain the

characteristics and qualities that make them eligible for wilderness protection in the first place. {See "Tribal" section as well.}

Response: We considered alternative C, which analyzed roughly 93,000 acres as recommended Wilderness in Mono County. The preferred alternative did not include any recommended wilderness in Mono County. In summary, the Dexter Canyon, Glass Mountains, Ansel Adams Wilderness Addition – Northeast, Adobe Hills, South Huntoon Creek, Huntoon Creek and Pizona-Truman Meadows areas were not proposed as recommended wilderness within alternative B-modified because they 1) did not increase the manageability of adjacent wilderness areas as wilderness, 2) were not manageable as wilderness, or 3) did not add under-represented ecosystems to the National Preservation System. The rationale explaining why the forest supervisor selected specific recommended wilderness areas in the preferred alternative is included in the preliminary administrative recommendations section of the record of decision.

In the final plan, we added recreation management zones to address differing types of management needs in different forest landscapes. Roughly half of the remaining portion of Mono County on the Inyo, outside of wilderness, is in the Challenging-Backroad Recreation Area, where standards and guidelines were designed to retain low use with undeveloped, natural landscapes and challenging access (final plan, chapter 3). These areas of natural landscapes would retain a primitive and semi-primitive motorized and semi-primitive non-motorized recreation opportunities and settings for forest users.

For a discussion of Tribal consultation, see response to comment 5044.

2108

Wild and Scenic Rivers Allowable Activities.

The board would like to convey concern, again, that the management of Wild and Scenic Rivers should allow for necessary treatments, which may be mechanical, to manage fuel loading and fire suppression activities.

Response: The responsible official may authorize site-specific projects and activities on National Forest System lands within eligible or suitable river corridors only where the project and activities are consistent with Forest Service Handbook 1909.12, chapters 80, sections 84.2, and consistent with the interim protection measures outlined in section 84.3.

Wild and Scenic River classification or management direction does not preclude management activities such as watershed, range, wildlife, grazing and timber projects (FSH 1090.12, chapter 80, 84.3).

Any project level planning in these eligible river corridors will need to be consistent with their preliminary classification and protect the values that provide the basis for their inclusion in the National Wild and Scenic River System by following forest plan direction (MA-EWSR-DC and MA-EWSR-STD) until such time as a negative suitability determination is made or Congress makes a final determination on their designation.

2109

Regarding Wild and Scenic River (WSR) eligibility, Mono County supports the segments identified within the county in alternative B, and proposes the addition of several other segments. Mono County supports inclusion of the following waters on the Wild and Scenic River eligibility list and includes the applicable Outstandingly Remarkable Values (off-road vehicles): * Rush Creek: The upper segment from the headwaters to

the inlet were found to be eligible under the wild classification (2015 Draft Wild and Scenic River Eligibility findings), and should be included as such in the draft plan. The segment from the outlet of Silver Lake to the inlet of Grant Lake should be considered eligible, as it is both scenic and a very popular recreational fishing area. Off-road vehicles s include scenic and recreational. The segment from the bottom of the Mono Gate One Return Ditch to Mono Lake should be considered eligible, as it has been significantly restored due to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. More than 15 years of State Water Board-ordered restoration has transformed this reach from a barren creek into a vibrant, recovering riparian system. Recreational activities include fishing, photography, hiking and birding. Geologic features; wildlife habitat, especially for sensitive/endangered bird species; Native American history and resources; and general outstanding scenery justify the eligibility of this reach of stream. Off-road vehicles include scenic, recreational, geological, wildlife, cultural and other values, and hydrologic transitions from diversions to restoration. Finally, the Inyo National Forest should consult with the Los Angeles Department of Water and Power on identifying segments flowing through its property as eligible. * Lee Vining Creek: Four segments were identified as eligible in the 2015 draft Wild and Scenic River eligibility findings and should be included as such in the draft plan; the county suggests the segment from the Los Angeles Department of Water and Power diversion pond to Mono Lake also be included. This stretch of water has undergone significant State Water Board-ordered restoration and habitat recovery, improving migratory wildlife habitat connectivity and critical riparian corridors. This segment also includes Lee Vining Creek Trail, and natural and political history interpretive features, and connects key recreation destinations. Off-road vehicles include scenic, recreational, wildlife and hydrologic transitions from diversions to restoration. * Parker Creek: The headwaters to Ansel Adams Wilderness boundary was determined to be eligible in the 2015 draft Wild and Scenic River eligibility findings. The county suggests including the segment from the Ansel Adams Wilderness boundary to Rush Creek, as this reach is no longer diverted, is now free-flowing in perpetuity, and provides important spawning habitat for self-sustaining trout populations. Off-road vehicles include scenic, fish and other values, and hydrologic diversion history to the current free-flowing, restored system. In addition, the Inyo National Forest should consult with Los Angeles Department of Water and Power on identifying segments flowing through its property as eligible. * Walker Creek: Two segments were identified as eligible in the 2015 draft Wild and Scenic River eligibility findings and should be included as such in the draft plan; the county suggests the segment from below Walker Lake to Rush Creek also be included. This segment is no longer diverted, is now free-flowing in perpetuity, and provides important spawning habitat for self-sustaining trout populations. Off-road vehicles include scenic, fish and other values, and hydrology diversion history to current free-flowing, restored system. In addition, the Inyo National Forest should consult with LADWP on identifying segments flowing through its property as eligible. * Mill Creek: The County supports including the segment from below US Highway 395 to Mono Lake on the list of eligible WSRs. However, the County's recommendation is conditioned on the inclusion of language within any eventual legislative designation that such designation shall not impact or impair historic water rights, uses of water, or activities on the Conway or Mattly ranches. This segment is noted for its scenic vistas of the Sierra crest, canyon walls and Mono Lake, and recreation such as fishing, birding, hiking and photography is increasing. A portion of this segment is within the Mono Basin National Forest Scenic Area and is therefore subject to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. Geological features, riparian songbird and waterfowl populations and habitat, and migratory bird habitat connectivity justify the eligibility of this stream

reach. Off-road vehicles include scenic, recreational, geological and wildlife. * Wilson Creek: The county supports including the segment below the DeChambeau Ranch diversion on the list of eligible Wild and Scenic Rivers. However, the county's recommendation is conditioned on the inclusion of language within any eventual legislative designation that such designation shall not impact or impair historic water rights, uses of water, or activities on the Conway or Mattly ranches. The county has not conducted an evaluation for Wild and Scenic River eligibility; however, our understanding is that this segment is noted for its scenic vistas of the Sierra crest, canyon walls, and Mono Lake; recreational activities such as birding, hiking and photography; geological features; waterfowl habitat and migratory bird habitat connectivity. This segment is within the Mono Basin National Forest Scenic Area and is therefore subject to management actions directed at protecting its geological, ecological, cultural, scenic and other natural resources. Off-road vehicles potentially include scenic, recreational, geological and wildlife.

Response: The Wild and Scenic River evaluation has been updated for the Rush, Lee Vining, Parker, Walker, Mill and Wilson Creeks (final environmental impact statement, appendix C). Public comments on the river-related values and determinations for outstandingly remarkable values were considered and updated where they reflected the criteria outlined in chapter 80 of the Land Management Planning Handbook (FSH 1909.12). Six segments of Rush Creek are considered eligible; four segments of Lee Vining Creek are considered eligible; one segment of Parker Creek is eligible; two segments of Walker Creek are eligible; five segments of Mill Creek are eligible; and Wilson Creek is not eligible.

2110

Measureable Partnership Objectives.

To provide further commitment to partnerships, Mono County would like to see measurable objectives included in the Draft Plan (for example, in chapter 3, Plan Objectives). Such objectives would also encourage implementation and accountability, and enable the celebration of successes.

Response: Within the “Volunteer, Interpretation, Partnership and Stewardship” section of the plan, a goal has been added to address the need to hire a forestwide partnership/volunteer coordinator (VIPS-FW-GOAL 10). Though it is not framed as a specific measurable objective, appendix C of the final plan outlines steps to create a greater partnership focus on the Inyo that would permeate all aspects of forest management. More specific objectives would be created for each partnership, so that each one could be successful at meeting its relevant goals, as explained in appendix C of the final plan, under, “Define specific objectives of the partnership.”

2111

Concrete strategies working with communities.

The forest plan should specifically acknowledge the important relationship of the Inyo National Forest with communities, and include concrete strategies for working with these communities both for public benefit purposes and to foster stewardship by the communities. As a specific example, the plan should include increased education and enforcement in areas near communities. The impacts of illegal activities on nearby forest lands have been a concern in every community in Mono County, and especially in the Swall Meadows area.

Response: The plan includes a set of components specifically addressing our relationship with local communities, in chapter 2, “Local Communities,” and another set focused on “Volunteers,

Interpretation, Partnership and Stewardship." The environmental impact statement has a focus on the importance of local communities and working with them to manage the national forest to acknowledge their desired and needs. One of the areas identified as a need for change is, "(2) to address benefits to people and communities". Throughout the document, relationship with local communities is emphasized. For example, revision topic 3, "Sustainable Recreation and Designated Areas" calls out the need to provide sustainable and diverse recreation opportunities that meet many goals, including, "reflect desires of local communities".

The law enforcement program is centralized out of the Washington Office (WO). The Inyo's law enforcement capabilities are dependent on the Washington Office budget for this program. Illegal uses on federal lands are managed under current laws and these laws do not need to be repeated within the plan (36 CFR 219.2 (2)).

2112

Emphasis on healthy, multi-age forest mosaics.

Based on the low economic productivity and potential of the timber market, Mono County requests the Inyo National Forest manage for a healthy, multi-age forest with the appropriate mosaics of successional stages and dominant species types across the landscape, rather than economic gain through timber harvesting.

Any positive benefit to the economy from timbering in Mono and Inyo Counties is likely to be less than the negative benefit on recreational tourism which is the basis of our local economy.

Response: The forest plan contains a number of plan components that support forest landscapes that are healthy, resilient, structurally and compositionally diverse, and supportive of a broad array of habitats for wildlife and plant species. Some of these forest-wide plan components include TERR-FW-DC-01 (vegetation mosaic provides for ecosystem integrity and diversity), TERR-FW-DC-02 (vegetation resilient to climate change, altered fire regimes, and other stressors), TERR-FW-DC-04 (landscape mosaic provides habitats for many wildlife species), TERR-FW-DC-07 (vegetation condition reduces the threat of undesirable wildfires to local communities, ecosystems and scenic character), and TERR-FW-DC-10 (ecological conditions in relatively pristine landscapes are primarily the result of natural ecological processes). Collectively, these plan components sustain healthy, resilient, and diverse forest ecosystems and the local communities dependent on them.

Economic benefit from timber on the Inyo National Forest does not contribute significantly to the local economy nor does it support critical local wood processing infrastructure or jobs in Mono and Inyo Counties. Recreation on the Inyo National Forest is an important economic contribution to local economies that is highlighted in the final environmental impact statement, Economic Conditions – Key National Forest Contributions and final environmental impact statement, Economic Conditions – Important Inyo National Forest Contributions to Inyo County.

Alternatives

2113

Alternative B should be strengthened with some aspects of alternative C, by adding specific standards and guidelines for measuring how the Agency is progressing to implement the new plan. Add wilderness as in alternative C.

Response: The plan, which implements alternative B, includes a monitoring plan that was designed to measure how the Inyo is meeting desired conditions identified in the plan (final plan, chapter 4). This requirement to measure effectiveness of the plan is not specific to alternative C, but is a requirement in all forest plans.

We received many comments advocating for adding more recommended wilderness, as in alternative C, and many comments advocating for less recommended wilderness, as in alternative D. We analyzed both scenarios. The draft record of decision explains how the forest supervisor considered public comments, wilderness characteristics, and other factors to determine which wilderness areas to recommend in alternative B. This rationale can be found in the "Preliminary Administrative Recommendations" section of the record of decision.

2114

Watershed Values as Priorities.

Watershed values should be the highest priority. Watershed In desert areas like the Owens Valley, riparian areas are a small percent of the landscape. Greatest precipitation falls in the mostly high elevation areas managed by the U.S. Forest Service in the Sierra, White and Inyo Mountains. In times of drought and climate change, I hope for the most conservative and thoughtful approaches to safeguard the watersheds that the three national forests provide. These high elevation areas provide the snow pack to feed riparian areas and groundwater resources not just on national forests but into the valleys below.

Response: The plan includes desired conditions, objectives, goals, standards, and potential management approaches that address all watersheds across the Inyo National Forest (final plan, chapter 2, Watershed section). In addition to this direction, the plan includes a new management area, conservation watersheds, which address the need to maintain functionality of specifically designated watersheds to provide for beneficial uses of water and at-risk species habitat and connectivity (final plan, chapter 3, Conservation Watershed introduction). Plan direction for these areas address the intent that management for these watersheds is maintained for the long-term (MA-CW-DC 01-03; MA-CW-OBJ 01; MA-CW-STD 01; and MA-CW-GDL 01-03).

2115

Los Angeles Department of Water and Power is requesting that their employees be granted access to areas that are deemed restricted for work related purposes on the Inyo National Forest.

Response: Los Angeles Department of Water and Power is the holder of land special use permits on the Inyo National Forest - for water delivery, water management and power transmission facilities located on forest land. Los Angeles Department of Water and Power can officially request access to Inyo National Forest land for operation and maintenance of their permitted facilities in areas where the general public may not be permitted motorized access (FSH 2700, chapter 2711 and FSH 2709, chapter 50). Administrative access is granted by the forest

supervisor or the district ranger on a site specific basis at the project level, typically through a special use permit, thus this comment is not related to the current forest planning effort.

2116

The preferred alternative B recommends less wilderness areas (all in Inyo County and none in Mono County) than alternative C. This is unfortunate as Mono County has much land that is wild and undeveloped and qualifies as wilderness.

Response: See response to comment 2107.

2117

I believe Inyo County needs to recognize that a healthy, vibrant forest that offers solitude, healthy ecosystems, and quiet has a far larger role in contributing to a vibrant local economy than has been acknowledged to date. If this is actually valued, then the county's recommendation of plan D is counter-productive. Plan B is the only plan that is inclusive and respectful of multiple perspectives.

Response: The plan recognizes the value of the Inyo National Forest for multiple purposes throughout the plan, calling out the "Distinctive Roles and Contributions of the Plan Area" in chapter 1. These contributions are numerous, but as stated in chapter 1 recreation is what brings most people to the Inyo, and provides a major driver to local communities, though forest products, grazing, providing clean water, and other uses are all also called out. The record of decision explains the forest supervisor's rationale in selecting alternative B, and how he considered providing a balanced approach to managing the national forest for users and its diverse ecosystems.

2118

Fire management in alternative B is inadequate. Managed fires should mimic natural fire regimes.

Response: All plan direction in relation to fire is based on natural fire regimes and current, peer reviewed science and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments including mechanical, prescribed and wildland fire managed for resource benefit. These activities also benefit wildland urban interface communities, infrastructure and historic and cultural values at risk. Proposed alternative B estimates 20,000-25,000 acres/decade of both mechanical and prescribed fire and 49,000 acres/decade of restoration fire related activities. While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need to consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion.

2119

It is vital that we protect public land for all of us including the animals, birds, vegetation, watersheds that reside within its borders. I prefer alternative C because as we all know once a place is compromised there is no going back.

Response: All of the alternatives, including the preferred alternative, have components designed to protect the Inyo's natural resources. The analysis of the preferred alternative explains some of the short and long-term beneficial and adverse effects that could occur, and show that because of its greater emphasis on fuel treatments and active management, the preferred alternative should have some greater long-term benefits than alternative C due to greater reduction in large, stand

replacing fire risk across the Inyo that could alter natural communities, and increase resiliency to climate change and other stressors (final environmental impact statement, chapter 3). Alternative C also has adverse effects and benefits, which area analyzed throughout chapter 3 of the final environmental impact statement. The record of decision contains the forest supervisor's rationale in selecting alternative B as the preferred alternative, including the balance of ecological sustainability, local economies, and social and cultural values.

2120

We encourage the Inyo National Forest to adopt alternative C, which is the most protective and would recommend 317,000 acres of new wilderness in both Mono and Inyo Counties. This alternative provides much more protection and better management regarding water, grazing, endangered species and better logging practices. Alternative C also recommends adding 51 percent of the inventoried areas to new wilderness. {May also be in wilderness.}

Response: Alternative C and B were analyzed for effects to water quality, endangered species, and vegetation, as well as recreation, economics and other resources. The effects analyses are within the final environmental impact statement, chapter 3. The forest supervisor considered these effects when determining whether to choose alternative B or C, and chose an alternative that balanced the multiple uses of the national forest. The rationale explaining why the forest supervisor selected specific recommended wilderness areas in the preferred alternative is included in the "Preliminary Administrative Recommendations" section of the record of decision.

2121

Alternative C provides much better management practices (for at-risk species); we ask you adopt it.

Response: The decision to select alternative B-modified is included in the record of decision. The final environmental impact statement includes the viability analysis for at-risk species for each alternative, including alternative B-modified and alternative C (final environmental impact statement, chapter 3, "Ecological Integrity" section).

2122

Alternative C is much, much better, but still is weak on wilderness protections. I think you need to rework that alternatives entirely. The alternatives as they exist favor destructive forest practices way too much.

Response: Alternative C includes about 315,000 acres of recommended wilderness, which is about one-third of the Inyo National Forest that is currently outside of wilderness. We also considered an alternative that would add all of the areas identified by the public as recommendations for additions to the National Wilderness Preservation System, but eliminated it from detailed study. The reasons for eliminating that alternative are presented in the alternative eliminated two of the alternatives considered but eliminated from detailed study of chapter 2 in the final environmental impact statement. The final environmental impact statement, volume 2, appendix B, "Analysis" section explains why each of the non-analyzed inventoried polygons are not potentially suitable for inclusion in the National Wilderness Preservation System (see table in the Rationale for Areas Not Analyzed as Recommended Wilderness in the "Environmental Impact Statement" section). The rationale explaining why the forest supervisor selected specific recommended wilderness areas in the preferred alternative is included in the "Preliminary Administrative Recommendations" section of the record of decision.

The analysis of effects to forest ecosystems and species, show that each alternative may have differences in the amount of in-direct effects, but that all the alternatives do not lead to destructive forest practices. The plan includes standards and guidelines that minimize impacts from management activities and these can be found throughout the plan.

2123

Alternative D and Motorized Access.

The draft revised land management plan for the Inyo National Forest (and also likely for the Sierra and Sequoia) attempts to limit access via the wilderness, recreation opportunity spectrum primitive, recreation opportunity spectrum semi-primitive, non-motorized, Pacific Crest Trail setbacks, aquatic refuges, etc. We can all easily agree to share the beautiful forest, except for the special interest groups that want to exclude all motorized access. We need to expand motorized access and not reduce it. For that reason, alternative D is the best one because it restricts the least access to the public lands yet still provides protection.

Response: The preferred alternative includes 37,029 acres of recommended wilderness, while alternative D includes none. None of these areas contain any existing authorized road or motorized trail, so they should not affect any motorized access. While snowmobile access would no longer be authorized in these recommended wildernesses, they are in areas of the Inyo that rarely, if ever, receive enough snow for snowmobile use and are not known to have current snowmobile use. The impacts of recommended wilderness on acres of motorized recreation opportunity spectrum settings is discussed in chapter 3 of the final environmental impact statement (Revision Topic 3; Recommended Wilderness; “Environmental Consequences; Recreation Settings and Opportunities, Access, and Recreation Management” section). Pacific Crest Trail setbacks are almost entirely in existing wilderness, and critical aquatic refuges do not exclude motorized uses. Therefore, the final environmental impact statement does not show a big difference in motorized access between alternative D and the preferred alternative. The draft record of decision explains why the forest supervisor selected the preferred alternative, and how he considered sustainable ecosystems and recreation in his decision.

2124

Alternative D should be chosen because increasing wilderness will over-use the remaining public access and increase environmental issues in the immediate future.

Response: None of the new recommended wilderness areas in any alternative intersects an existing National Forest System road or motorized trail. The process used to identify possibly suitable Wilderness areas took into account whether an area had existing system roads, and buffered those roads and removed the buffered area from the polygons (cherry stem roads) (final environmental impact statement, volume 2, appendix B). Therefore, the impact of moving motorized users outside of the recommended wilderness areas to other areas of the Inyo would be minimal; however, there may be an affect to access by mountain bikes in alternative C (final environmental impact statement, volume 1, chapter 3, “Sustainable Recreation and Scenery” section). Changes in other recreation activities were also evaluated and determined to be minimal. Any site-specific resource issues that are identified would be dealt with through project-level planning and not through this planning process.

It is unclear in the comment what type of environmental issues would be caused by recommending wilderness in alternatives B and C. The effects to other resources, including water, soil, and vegetation, are included throughout chapter 3.

2125

Wildfires - you have all the science on wildfires and I respect that. I have experienced a house fire and therefore have to vote for the maximum community protection. Once again, I have to vote for alternative D.

Response: The effects of all alternatives on wildfire risk to local communities is in the "Environmental Consequences to Fire Trends" section of the final environmental impact statement (chapter 3, "Revision Topic 1: Fire Management" section), and interspersed through other sections of the chapter 3. It explains that alternative D would likely lead to a greater reduction in large fire size relative to alternative B, but they would both reduce large fire size relative to alternative A (current management). While fire was one factor that the forest supervisor considered when selecting a preferred alternative, he also considered effects to recreation, budget, ecological sustainability, and other factors, as explained in the draft record of decision.

Process and Public Comments

2126

The Inyo needs to analyze the comments, incorporating ones that are justified and that improve the plan, and then re-release it for further review and comment

Response: We have met the requirements of the Council for Environmental Quality regulations regarding the public comment period (40 CFR 1503.1); reviewing, analyzing, evaluating and responding to those comments (40 CFR 1503.4) and release of a final environmental impact statement and draft record of decision (40 CFR 1506.10(b)(2)). The decision to not release a supplemental environmental impact statement can be found in the "Decision and Reasons for the Decision" section of the record of decision.

2127

There should be a separate environmental impact statement tailored to the Inyo National Forest, given that the forest on the east side has a completely distinct character.

Response: We created a separate final environmental impact statement, while the Sierra and Sequoia plan to release a joint supplemental draft environmental impact statement.

2128

The Inyo National Forest Plan does not clearly distinguish scientific research from monitoring. If there is a desire to answer a particular question about a resource, it is best if monitoring is coordinated by someone with expertise in scientific research. This should ensure that monitoring is designed ahead of time to capture particular data.

Response: The purpose of the plan monitoring program (plan, chapter 4, Forest Plan Monitoring) is to inform forest managers about the status and trends of resources in the Inyo National Forest. Within this program, specific monitoring questions and their associated indicators are linked to key forest plan components. These questions have been developed by scientists and are being presented now in the forest plan prior to being implemented. This monitoring information ranges from simple statistical data to more complex scientific research. Together, these data are collected, analyzed, and reported by U.S. Forest Service scientists biennially. Sometimes, research projects are also conducted in the Inyo National Forest by the Pacific Southwest Research Station, but these research projects are not specifically linked to forest plan components.

2129

Science Coordinator - The Tribe recommends the Inyo National Forest retain a Science Coordinator. His or her role would be to work with existing staff to identify questions specific to needs of the Inyo National Forest that may be addressed by scientific research, to reach out within the agency or to colleges and universities (etc.) to attract scientists, and to coordinate with forest permitting to ensure that appropriate projects are reasonably supported. Scientists should be obligated to publish and communicate with the science coordinator.

Response: Currently, the plan monitoring program identifies monitoring questions relevant to key resource and management issues in the Inyo National Forest (chapter 4, Forest Plan Monitoring). These results will be published in a biennial evaluation report. Using the results, the forest supervisor would coordinate with the scientists and planners on the Inyo to determine if the forest plan needs to be changed, amended, or revised to better meet the desired conditions or objectives in the national forest. In the future, if the forest supervisor determines there is a need, they could identify a science coordinator.

2130

BASI/Science Coordinator - The documents refer to use of "best available science" and "best management practices." These sound good, but also suggest an opportunity to not do more science because something was already determined to be "best." Perhaps a forest science coordinator could work to ensure the best is truly the best, and he or she would always advocate for doing better!

Response: Using the best scientific information available now does not mean we will stop collecting new scientific information in the future. On the contrary, the purpose of the plan monitoring program is to collect, analyze, and report on new information biennially (FSH 1909.12, chapter 30, Section 34). Furthermore, other programs within the Forest Service and outside partners are continually collecting scientific information for various research projects. Thus, the best available scientific information will continue to improve over time as directed in the 2012 Planning Rule (36 CFR 219.3).

2131

The Tribe sees an opportunity for the relatively new "field" called "traditional ecological knowledge" to thrive if practitioners of western science and people holding traditional ecological knowledge communicate. The Tribe sees opportunities for this at the regional (Inyo National Forest) scale.

Response: Traditional ecological knowledge is recognized as a valued part of the process when developing and implementing restoration projects and other forest programs (TRIB-FW-DC-04). Coordination and cooperation with Tribes is recognized throughout the forest plan.

Management Areas

3000

According to directives for the 2012 Planning Rule, forests must meaningfully consider and analyze recommendations for designated areas such as research natural areas and special interest areas, and make a supported determination whether to recommend any additional areas. This will necessarily require a revised or supplemental draft environmental impact statement. This should include cultural sites, such as historic pack stations, historic mines, cabins, settlements, railroads, access routes and other

features used by pioneers, homesteaders, loggers, settlers and miners. The Forest Service should prioritize special designation of areas suitable for inclusion in the National Wilderness Preservation System that are not recommended for wilderness designation in the final plans, as well as other areas currently identified in the draft environmental impact statement and draft plans as having important ecological values, such as wetlands, meadows, zoological areas and critical aquatic refuges.

Response: In our notice of intent to start environmental analysis scoping for plan revision, our proposed action stated that "no new designated areas are being recommended at the time" aside from what may come out of the required wilderness recommendation process. The responsible official considered additional designated areas and concluded that additions were not warranted. (See record of decision rationale for designated areas). The idea of having additional designations for areas that have wilderness characteristics but were not recommended for wilderness or lands with important ecological values, such as wetland and meadows, were considered as we revised the draft plans. The identification of conservation watersheds and the analysis of viability and persistence of at-risk species indicates that plan components are adequate for protection of those values. In the record of decision, the responsible official describes the attempt to reach a balanced management scheme in terms of designated areas and other types of land allocations to best manage for multiple uses and needs.

3001

The draft plans do not address the overlapping nature of the management areas and do not set priorities among management areas, the desired conditions and priorities for action, and management cannot be determined for a given location. There are many approaches that can be used to convey the relationship among management areas, for example, matrices, tables and maps combining management areas.

Response: The integration of plan components is an essential element in the 2012 Planning Rule. The integration of plan components means that all plan components work together toward achieving or maintaining desired conditions and are internally consistent. Much of the direction in the revised plan was carried over from existing plans, so inherently much of this integration already existed. Staff on the Inyo National Forest conducted an exercise to determine if any overlapping direction conflicted with each other. Their conclusion was that the plan direction was compatible; therefore, no table was needed.

3002

The approach taken on suitability can lead one to wonder if suitability of a use was not considered in a given management or geographic area, or if its omission is intentional. We ask that you include a suitability of uses table similar to the one provided in the Lake Tahoe Basin Unit plan (USDA Forest Service 2016c, table 4, p. 98). This table helps to clarify common uses, suitability, and when needed, the context for their suitability. Inclusion of such a table would improve the clarity of the draft plans.

Response: The Planning Rule states that the 'suitability of lands need not be identified for every use or activity," and the only requirement is that "Every plan must identify those lands that are not suitable for timber production" (36 CFR 219.7 (1)(v)). For the Inyo Forest Plan, limited suitability determinations were made where it was determined to advance or complement the other plan components. Areas where suitability determination are made in the Inyo final plan are timber, recommended wilderness, ancient bristlecone pine forest, research natural areas, Pacific Crest Trail and designated wilderness.

3003

There are additional management areas that have not been identified in the draft plans, yet should be. These areas include protected activity centers for California spotted owls and great gray owls, home range core areas for California spotted owl, marten core habitat, community buffers, focus landscapes, recreational opportunity spectrum and scenic integrity objective. Each of these areas has specific management direction, including desired conditions, standards and guidelines associated with the area that has been defined. We ask that you include these as management areas and revise the draft plans to reflect this.

Response: The Planning Rule states that the plan must indicate whether specific plan components apply to the entire planning area (forest-wide), to specific management areas or geographic areas, or to other areas (36 CFR 219.7(e)). Considerable changes to the architecture of the Inyo plan were made between draft and final. Attention was given to when an area was a management area, designated area or other areas. Management areas were used to provide broad, integrated direction representing a specific emphasis, such as the sustainable recreation areas or the riparian conservation areas. Where there is a more focused, resource-driven emphasis, we used “other areas,” such as the recreation opportunity spectrum that identifies recreation settings, or scenic integrity objectives that identify how natural a landscape appears.

3006

We also think the use of "management areas" is inconsistent and needs to be clarified in the draft plans (for example, see comments above on missing management areas). We think the distinction between "management areas" and "geographic areas" is an important one and helpful to understanding the actions allowed or planned for on the landscape.

Response: See Response to 3003.

National Environmental Policy Act Process

4000

As required by the Council on Environmental Quality regulations for implementing the National Environmental Policy Act, the draft environmental impact statement is deficient in describing the affected environment and in comparing predictions of the effects of the proposed action and alternatives; therefore, add clarity and detail to affected environment and re-analyze consequences.

Response: 40 CFR section 1502.15 - Affected Environment states, “The environmental impact statement (environmental impact statement) shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues. Verbose descriptions of the affected environment are themselves no measure of the adequacy of an environmental impact statement.”

40 CFR section 1502.14 – Alternatives including the proposed action states that the environmental impact statement “should present the environmental impacts of the proposal and the alternatives in a comparative form, thus sharply defining the issues and providing a clear bases for choice among options by the decision maker and the public.” The comparisons made

between the alternatives will be based on the environmental effects of alternatives discussed in the environmental impact statement pursuant 40 CFR section 1502.16(d) Environmental Consequences.

Both the draft environmental impact statement and now final environmental impact statement include a description of the affected environment under each section in chapter 3, Affected Environment and Environmental Consequences, of the environmental impact statements. Some sections are more succinct than others, and all include a summary of the affected environment considered in order for the interdisciplinary team to determine the effects of the environment.

In addition, each section in chapter 3, Affected Environment and Environmental Consequences, of the environmental impact statements contain a “Summary/Analytical Conclusions” section that present the environmental impacts in a comparative form that allows a sharp comparison of the issues to provide a clear basis for both the public to review and in which decision maker can base the decision pursuant to 40 CFR 1502.14.

And finally, chapter 2 alternatives, including the proposed action contains a “Comparison of Alternatives” section that provides a comparison of (1) management areas; (2) restoration activities; (3) water, aquatic and riparian ecosystem restoration activities over 10 years; (4) sustainable recreation and scenery activities over 10 years; (5) benefits to people; and (6) Tribal relations (final environmental impact statement, volume 1; chapter 2; comparison of alternatives), which further complies with 40 CFR 1502.14.

4001

The draft plans and draft environmental impact statement contain many gaps in information and are missing many important analyses to support sufficient public review and understanding. A revised draft environmental impact statement or a supplemental draft environmental impact statement must be done to address the "substantial changes" that must be made to the draft plans to comply with the National Forest Management Act and the 2012 planning rule and to integrate the "significant new information" provided through public comment.

Response: 40 CFR 1502.9(c) states that agencies (1) shall prepare supplements to either draft environmental impact statement or final environmental impact statement if: (i) the agency made substantial changes in the proposed action that are relevant to environmental concerns; or (ii) there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. To comply with this requirement, due to the change in conditions related to tree mortality, the Forest Service separated the Sierra and Sequoia plans and will prepare revised draft environmental impact statements for a public comment period. The Inyo has not experienced the same level of tree mortality as the Sierra and Sequoia (see discussion in chapter 1 of the Inyo final environmental impact statement), there were no substantial changes to the proposed action, and there is no new information relevant to environmental concerns on the Inyo, so we are proceeding with finalizing the forest plan.

Regulations at 40 CFR 1502.9(b) state that final environmental impact statements shall respond to comments as required in part 1503 and that the agency shall discuss any responsible opposing view, which was not adequately discussed in the draft environmental impact statement and shall indicate the agency’s response to the issue raised. We developed this response to comments document to comply with this requirement.

This issue is not specific about the substantial changes necessary, but this commenter was more specific in other comments; therefore, the requested "substantial changes" are responded to elsewhere in this document. We have incorporated some requested changes and explained why others were not incorporated, and the changes made do not rise to the level of requiring a new draft plan and comment period.

4002

A revised draft environmental impact statement is required due to deficient impacts analysis from lack of sufficient baseline information (for example, due to tree mortality and ecologically and fiscally unsustainable road system); there is no way to tell what effect the proposed action will have on the environment if impacts analyses are incomplete.

Response: The final environmental impact statement addresses tree mortality on the Inyo National Forest in the "Insects and Pathogens;" "Terrestrial Ecosystems;" "Wildlife, Fish and Plants;" and the "Forest Products and Management" sections of chapter 3. The tree mortality figures on the Inyo National Forest are well below those of the west side of the Sierra forests, such as the Sierra and Sequoia. Although tree mortality is occurring on the Inyo, this has been taken into consideration in the effects analysis in the final environmental impact statement and the baseline was determined to be sufficient (see the record of decision).

The determination of a fiscally and ecologically sustainable road system have been determined under the Travel Management Rule, subpart B decision and completion of a Travel Analysis Report under the Travel Management Rule, subpart A. We have designated roads to be added into the National Transportation System (subpart B) and the minimum road network necessary to meet financial needs (subpart A). These decisions will not be changed in the final plan, or addressed in this planning process.

4003

Sustainable recreation and species protection are only partially addressed, with key elements of the draft plans and National Environmental Policy Act analysis missing, incomplete, inaccurate or inconsistent with the best available science. The draft environmental impact statement is "so inadequate as to preclude meaningful analysis" and review by the public, and therefore it necessitates a revised draft environmental impact statement (40 C.F.R. section 1502.9(a)).

Response: This issue is not specific about the missing key elements in the plans and environmental impact statement analysis, but this commenter was more specific in other comments; therefore, the claims of missing elements and analysis are responded to elsewhere in this document. The analyses included in the final environmental impact statement have been updated to eliminate incomplete information, fix inaccuracies, provide clarification, and incorporate additional best available scientific information in response to these public comments. Specifics concerning these updates are available elsewhere in this document. We have incorporated some of the requested changes and explained why others were not incorporated, and the changes made do not rise to the level of requiring a new draft plan and draft environmental impact statement.

4004

The analysis concerning potential future fire effects lacks National Environmental Policy Act requirements that the Forest Service determine likely outcomes when they

are important to inform the decision, and prevents meaningful comparison of alternatives, especially given that this difference in alternatives is the factor cited when selecting alternative B as the preferred alternative. Instead, the analysis of effects of alternatives consists of conclusory statements, without supporting information. For example, table 61 simply combines plan direction and consequences in a single entry for large trees, showing no consequences.

Response: We removed reference to "effects" in the table entitled "Plan direction and effects on large tree densities by location in alternative B" in chapter 3 of the final environmental impact statement ("Ecological Integrity," Terrestrial Ecosystems," "Terrestrial Ecosystem Processes and Functions," "Special Habitats" section). This was to clarify that this table provides plan direction information only, and it does not include information pertaining to effects of alternative B on large tree densities. Information pertaining to the effects of alternatives on large tree densities are provided in the "Special Habitats" section noted above. We inserted additional information on the effects of different diameter limits, which vary by alternative, on large tree densities in the Old Forests Specialist Report of the final environmental impact statement.

4005

The draft environmental impact statement and draft plans are incomprehensible and lack key order and/or information necessary to understand their findings.

Response: To improve comprehension and organization, the final plan was completely reorganized. Plan components are now organized by resource (final plan, chapter 2, Forestwide Desired Conditions and Management Direction; final plan, chapter 3, Area-specific Desired Conditions and Management Direction), rather than by component type, across multiple chapters as was seen in the draft plan. As a result, the plan is more readable and usable.

To further improve order and comprehension, the draft environmental impact statement was split into two documents. There is now a separate final environmental impact statement for the Inyo National Forest and another revised final environmental impact statement for the combined Sequoia and Sierra National Forests.

Additional changes were made to the final environmental impact statement to strengthen the information provided and analysis presented to provide the public and the decision-maker a more clear understanding of the impact of each alternative (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences). A summary of the changes made between the draft environmental impact statement and final environmental impact statement are summarized in the record of decision.

4006

The documents do not provide readers the information necessary to understand the importance of ecological processes, methodology to arrive at conclusions, and effects of alternatives.

Response: The final environmental impact statement has been strengthened in many places where specific comments have been made expressing concerns on understanding ecological processes. Ecological processes are a key issue and although the document is not intended to be encyclopedic, adjustments to wording has been made to clarify this area and additional references have been cited to allow the reader to obtain more information.

Chapter 3 of the final environmental impact statement summarizes the physical, biological, social, and economic environments of the planning area and the potential environmental consequences that may occur on those environments as a result of implementing each alternative. When public comments addressed specific concerns about the effects analysis this area was strengthened. A summary of the changes made between the draft environmental impact statement and final environmental impact statement are summarized in the record of decision.

"Analysis and Methodology" is a subsection in all of the resource environmental consequence sections in chapter 3 of the final environmental impact statement (final environmental impact statement, volume 1, chapter 3), which helps the reader understand the results of the effects analysis conducted.

4007

Response: Some words and concepts are not defined properly or at all, including: invasive species, integrated pest management, meadow, restoration, moist site, lower slope position, closed canopy, complex early seral habitat, plan components, place.

Definitions for invasive species, integrated pest management, complex early seral habitat, meadow, ecological restoration, and plan components have been added to the glossary in the final plan (final plan, glossary). The remaining terms are descriptive in nature.

4009

Sufficient detail is lacking for some of the assumptions to allow a reviewer to fully understand and comment on the assumptions or approach.

Response: More detail has been added to better define the assumptions relied upon in the analyses in the final environmental impact statement where deficiencies were identified (final environmental impact statement, volume 1, chapter 3, Introduction, "Science and Assumptions Used in the Environmental Analysis" section and "Analysis and Methods" section under each topic). All citations cited in the description of the assumptions used have been added to the project record.

4012

Feedback and comments from the public engagement process were not incorporated into the plans or draft environmental impact statement.

Response: The final environmental impact statement contains a summary of the public participation input and how public participation has informed the planning process (final environmental impact statement chapter 1, "Public Participation" section).

4014

American Whitewater's Wild and Scenic River previous comments were not carefully considered and integrated into the draft environmental impact statement as told by the planning team.

Response: The Inyo National Forest's Wild and Scenic Rivers (WSR) eligibility study has been updated in response to public comments on the draft environmental impact statement. The public provided river-related values and outstandingly remarkable values (ORVs) we hadn't considered in our draft analysis and questioned our rationale in determining why river-related values were not ORVs. Updates to the eligibility study are responsive to public comment and the planning rule (36 CFR sec. 219.7(c)(2)(vi)) that directs us to inventory and determine Wild and Scenic River

eligibility during forest planning. Several rivers that were not considered eligible in the draft environmental impact statement are now defined as eligible due to information provided by the public and updated evaluation of resource ORVs. Accordingly, we have updated the values listed for all rivers inventoried, including for those rivers that eligibility did not change. Some public comments questioned why the river-related values we listed for several rivers were not considered ORVs. To address this concern we've created a table to explain why each river related value does not meet the criteria for an ORV (final environmental impact statement, volume 2, appendix C). Similarly, public input critiquing our regions of comparison criteria led us to update, clarify and refine that criteria for historic and pre-historic river values and for some wildlife and fish species. This updated evaluation is included in volume 2, appendix C, of the final environmental impact statement.

4015

Lack of availability of quality maps made meaningful commenting difficult.

Response: In response to public comments concerning poor quality of maps, we created higher quality maps and included them in the final environmental impact statement.

4016

Maps need to include mining districts

Response: The Forest Service does not manage based on mining districts, so they are not included on the maps.

4017

Maps need to include elevation contours and section-township id

Response: The maps do not include elevation contours or sections or township and range lines because the scale of the maps causes the lines to detract from the intention of the map without adding useful information.

4018

Flexible forest plans lead to unacceptable levels of uncertainty, and this is not adequately addressed in the environmental impact statement and Plans, therefore, clarify and reduce the level of uncertainty.

Response: Uncertainty is addressed throughout chapter 3 of the final environmental impact statement where assumptions used in the environmental analysis are disclosed (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences). In order to analyze or estimate the consequences of alternatives at the programmatic plan level, many assumptions were necessary regarding the types of management activities, as well as, the type and extent of natural processes, which may occur. Each disclosed assumption made in the analysis of alternatives innately acknowledges uncertainty. Where deficiencies were specifically identified regarding specific assumptions or uncertainties by commenters, modifications were made to clarify the level of uncertainty. More detail has been added to better define the assumptions relied upon in the analyses in the final environmental impact statement where deficiencies were identified (final environmental impact statement, volume 1, chapter 3, Introduction, Science and Assumptions Used in the Environmental Analysis; and within each "Assumptions" section found within each subsection of final environmental impact statement, chapter 3).

4019

One draft environmental impact statement does not meet National Environmental Policy Act guidelines for the three national forests given that the individual forest characteristics are so unique. This is a fatal flaw as it begs of nondisclosure. The draft environmental impact statement should be written separately for each forest so that the individual effects from each forest to each surrounding area can be easily identified as called for under NEPA.

Response: After analysis of the comments and the substantial nature of the changed condition in the southern Sierra and the consequences to management needs, it was decided that the information gaps and changed condition warranted environmental impact statement divergence. For this reason, it was decided that the Sierra and Sequoia National Forest would be grouped together as a revised draft environmental impact statement while the Inyo National Forest planning documents would be finalized independently and brought to an Inyo specific decision. There is now an individual final environmental impact statement for the Inyo National Forest. It focuses solely on the effects of the Inyo Plan on the Inyo National Forest.

4020

Aspects of the forest plans and analysis (i.e. Westerling 2016) documents were not available through the whole comment period of the draft documents, in violation of NEPA.

Response: The Forest Service made the draft environmental impact statement and the draft plans available on the project website on May 27th, 2016, which was the beginning of the 90-day comment period. Due to national computer server issues, the project website was intermittently unavailable on Thursday, August 25, 2016. This system-wide error caused agency-wide issues that were not unique to this project. The comment period was extended by 4 days to end on Monday, August 29, 2016 due to the website malfunction. The interested parties were notified of the extension through an email message, a message on the project website, and messages sent out through social media.

Westerling 2016 was added to the project website within the 90-day comment period (on 7-7-2016) as a background document concerning climate change and fire. Although Westerling 2016 was not posted to the project website until 7-7-2016, the public was welcome to request additional information at any point during the comment period by contacting the forest plan Revision Planning Team Leader @r5planrevision@fs.fed.us. As Westerling 2016 was not cited in the draft environmental impact statement and was not a critical part of the planning documents, it was made available to the public as a courtesy and was not required to comply with regulations related to the planning process.

4021

High levels of uncertainty and incomplete or unavailable information related to fire and fuel reduction treatment effects on California spotted owls requires compliance with the National Environmental Policy Act requirements in 40 CFR 1502.22.

Response: 40 CFR 1502.22 states, “When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.” The final environmental impact statement complies with 40 CFR 1502.22 stating, “While short term benefits may be realized by spotted owls, such as increased prey and edge habitat, uncertainties remain regarding long-term occupancy and demographic performance

of spotted owls at burned sites (Keane 2014). Specifically, uncertainty exists regarding how the amounts and patch sizes of high-severity fire will affect California spotted owl occupancy, demographics, and habitat over long time frames (Keane 2014). The results of simulation modeling research summarized in Keane 2014 suggests that some fuels treatments can reduce fire risk and with minimal effects on owl reproduction, and may have long-term benefits of reducing wildfire risk that outweigh short-term effects of treatments" (final environmental impact statement; chapter 3; Revision Topic 2: Ecological Integrity; Wildlife, Fish and Plants; Status and Threats for At-risk Terrestrial Wildlife Species; Species of Conservation Concern; California Spotted Owl; Threats).

4022

These forests need more protection due to stress from drought, air pollution and existing uses. Limit or eliminate logging, motorized recreation, road building and grazing.

Response: Climate is a fundamental process that strongly influences other drivers and stressors in the Sierra Nevada, including drought and air pollution. The final plan includes components that provide direction (desired conditions, goals, and guidelines related to air quality; final plan, chapter 2, Forestwide Desired Conditions and Management Direction) that provide the framework to protect the Inyo National Forest from air pollution. The planning area air quality is influenced by external and internal sources of air pollution that can be affected by management direction provided in the plan. chapter 3 in the final environmental impact statement includes a section that looks at the impacts of the alternatives related to air pollution (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences, Revision Topic 1: Fire Management, Air Quality).

Chapter 3 in the final environmental impact statement also includes a section that summarizes current and future trends of climate to form the foundation for other analyses of environmental consequences (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences, Agents of Change: Climate, Fire, Insects, and Pathogens, Climate Change). The final plan contains plan components that guide (and potentially limit) logging, motorized recreation, road building, and grazing (final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Social and Economic Sustainability and Multiple Uses). See the record of decision for an explanation of how Alternative B-modified best balances ecological, social, and economic sustainability given various stressors on the landscape.

4023

The Plans illegally adopt a single species management approach for forest and rangeland management. The 2012 Planning Rule violates the plain language of National Forest Management Act, which requires a plan to provide for species diversity in order to meet overall multiple- use objectives - not the other way around. Multiple-use objectives are being sacrificed, by elevating diversity and viability above multiple uses, therefore violating National Forest Management Act, MUSYA, and the Organic Act.

Response: The National Forest Management Act requires that plans provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives (16 USC 1604 (g)(3)(B)). The 2012 planning rule requires that the agency provide plan components to maintain or restore ecological conditions within the plan area to contribute to maintaining viable populations of species across their range while providing for social, economic, and ecological sustainability (36 CFR 219). The Multiple Use

Sustained Yield Act (15 Public Law 86-517) states "it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Many distinctive roles and contributions of the Inyo are recognized and described in chapter 1 of the final plan (final plan, chapter 1, Introduction, Distinctive Roles and Contributions of the Plan Area). This section highlights the importance of the providing and maintaining these beneficial multiple-uses of the national forest. The benefits provided from all of the Inyo National Forest's contributions described in this section provide tremendous, ecological, social, and economic value. The final plan has identified long-term or overall desired conditions and provide general direction for achieving those desired conditions organized by resource, under two broad major categories: (1) Ecological Sustainability and Diversity of Plant and Animal Communities; and (2) Social and Economic Sustainability and Multiple Uses. Within these categories, the final plan includes specific desired conditions pertaining to Air Quality, Watershed Condition, Terrestrial Ecosystems and Vegetation, Animal and Plant Species, Invasive Species, Fire, Sustainable Recreation, Scenery, Timber and Other Forest Products, Rangeland Livestock Grazing, Geology and Mineral, Energy, and Cultural Resources (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). Also provided in the final plan are objectives, goals, standards, and guidelines, which were designed to work together, in an integrated way to achieve or maintain desired conditions (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). All of these plan components work together as a whole to meet the requirements of the 2012 Planning Rule (36 CFT 219.8 through 219.11), National Forest Management Act, and the Multiple Use-Sustained Yield Act.

Species-specific desired conditions and other plan components are included in the final plan (final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species); however, these components, hold no greater or lesser importance than the other plan component included in the final plan. These plan components were included to provide direction to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area while providing opportunities for recreation, range, timber, and other uses (final plan, chapter 2. Forestwide Desired Conditions and Management Direction). They do not specifically prevent any action, project, or activity from occurring on the Inyo nor do they compel any action, project, or activity (final plan, chapter 1, Introduction, Purpose of the Forest Plan).

4024

Forest product harvesting, some recreational activities and roads can have a negative impact on ecological sustainability and healthy forests; therefore, only allow the level of these activities that maintain ecological integrity.

Response: As directed in the 2012 Planning Rule and discussed in chapter 1, forest plan Content, the final plan is designed "to move the national forest toward ecological, social and economic sustainability." As noted in chapter 1 from the "Needs for Change to Revision Topics" section, one of the three main revision topics is ecological integrity. The final environmental impact statement contains multiple plan components specific to forest product harvesting, recreational activities and road management to ensure ecological sustainability and forest health. For example, the final plan, chapter 2, includes Desired Condition TIMB-FW-DC-02. A desired condition related to roads is, INFR-FW-DC. The final plan section for general recreation areas and challenging backroad recreation areas also include specific components related to ecosystem sustainability and forest health (final plan, chapter 2, MA-GRA-08, MA-GRA-GDL-01, MA-

CBRA-DC-02, MA-CBRA-DC-08, MA-CBRA-GOAL-01). Each resource covered under the "Ecological Sustainability and Diversity of Plant and Animal Communities" section of the final plan, chapter 2, includes multiple components that apply to all forest uses, including forest product harvesting, recreation activities and road management.

4027

The Forest Service chose the standard width riparian conservation areas for the new plans simply because they are the same as those in the existing plans. The new plans provide that the width of the riparian conservation areas can be adjusted at the project level if interdisciplinary analysis demonstrates a need for narrower widths. However, given the lack of scientific information that supports the one-size-fits-all buffer zones, the agency should rewrite the riparian conservation area standards to establish the size of the buffer based upon site-specific and desired conditions, rather than imposing a standard width unsupported by the best science.

Response: 36 CFR 219.8 (a)(3) Riparian areas, (i) requires that "The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of riparian areas in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, and (ii) requires that "Plans must establish widths for riparian management zones around all lakes, perennial and intermittent streams and open water wetlands, within which plan components will apply, giving special attention to land and vegetation or approximately 100 feet from the edges of all perennial streams and lakes. The Inyo's final plan complies with 36 CFR 219.18(a)(3)(i) and (ii) by defining Riparian Conservation Areas (RCA) widths and plan components (including standards and guidelines) to maintain or restore riparian areas in the plan area.

The final plan's provision to allow RCA widths to be adjust to meet or improve RCA desired conditions if a need to do so is identified at the project level through an interdisciplinary analysis allows RCA buffers to be adjusted based on site specific conditions and new scientific information as it becomes available. Incorporating and maintaining the existing RCA widths into the final plan provides the foundation for which the final plan can guide a focused effort on riparian area conservation and maintenance until better science or new science becomes available.

4028

The comparison of costs of mechanical treatment versus managed fire in the draft environmental impact statement fails to take a hard look at such comparisons and is arbitrary and lacks transparency, and is in violation of NEPA. The overall costs of a logging project (project planning, National Environmental Policy Act analysis, survey time, road building, contract and sale layout, oversight of what is usually a 5-year implementation period, potential piling and clean-up, contracting costs and more) are far greater than the costs of a large scale prescribed fire project and managed wildfire. In the case of managed wildfire use, while there should be some pre-planning and zoning (as in the Wildfire Risk Assessment) there are no National Environmental Policy Act costs, survey costs, layout costs, long implementation period, sales prep and administration cost outlays. Therefore, include an analysis in the draft environmental impact statement that compares the costs of logging, prescribed burning, and wildfire use.

Response: See response to Unique ID 7088.

4030

The wildlife BE inappropriately punts examination of the cumulative effects that are essential to the evaluation of risks and benefits, in the long and short term, and critical to support a finding that viability will be maintained in the plan area for species of conservation concern and throughout the species range (RFSS) to project level NEPA

Response: The cumulative effects analysis in the wildlife biological evaluation has been re-written to discuss potential cumulative changes to relevant ecological conditions within the plan area from implementing alternative B-modified. The analysis considers, where relevant, cumulative effects from actions that may occur on adjacent lands, especially actions that may occur on National Park Service and Bureau of Land Management lands.

4031

Plan components presented in Table 83 of the draft environmental impact statement (p. 350) as "plan components for habitat integrity, sustainability and or species persistence" do not meet that purpose because they do not identify specific habitat needs required by breeding willow flycatcher; they do not ensure habitat conditions required by at-risk species are provided, as required by National Forest Management Act 219.9(b).

Response: The analysis of plan components that provides for the ecological conditions that contribute to species persistence has been substantially improved in the final environmental impact statement to more clearly identify the ecological conditions that they provide for. See the final environmental impact statement, chapter 3, Wildlife, Fish and Plants Section for the relevant plan components that address key threats to the dense willow or other shrub thickets within large wet meadows that provide the ecological conditions needed by willow flycatcher.

4032

The draft environmental impact statement fails to adequately inform the decision-maker and the public about the likely consequences of the alternatives. The draft environmental impact statement does not provide enough information about what kinds of activities the plan would allow, or where they would occur. It also does not properly disclose the environmental effects of the revised plans. Where the plan does not limit effects through explicit plan standards and guidelines, the draft environmental impact statement must disclose the worst possible effects that would be allowed by the plan. Instead the draft environmental impact statement relies on an unverified assumption that flexibility, by itself, is inherently good for at-risk species.

Response: See responses to comments 4009 & 4018.

The final environmental impact statement chapter 3 displays the consequences of the various alternatives in the Environmental Consequences section of each resource area addressed. Parts of this analysis have been strengthen in response to specific concerns addressed in comments. There is a robust analysis of the effect of the various alternatives on at-risk species (final environmental impact statement, chapter 3 Revision Topic 2: Ecological Integrity Aquatic and Riparian Ecosystems and Wildlife, Fish and Plants), which has been strengthened in many areas in response to public comment.

As stated in the final environmental impact statement, this effects analysis examines the implications of the programmatic framework provided by the Final plan, not site specific effects of possible future projects (final environmental impact statement, chapter 3, The Relationship between forest plans and Site-specific Activities section).

The final environmental impact statement does not conclude that flexibility alone is inherently good for at-risk species but rather concludes that in the current dynamic environment flexibility allows management to address site specific conditions while monitoring allows forest managers to determine if changes are resulting in movement toward desired conditions, and if there is a future need to change, which may drive future amendments or revisions to the plan.

As stated in 40 CFR 1502.2(b), “Impacts shall be discussed in proportion to their significance. There shall only be brief discussions of other than significant issues”. This does not require that the final environmental impact statement disclose the worst possible effects, but the estimated effects of the analysis, in a succinct manner.

4033

This draft environmental impact statement is fatally flawed. Compliance with the National Forest Management Act requirements for diversity have not been demonstrated because there is no determination of the quantity of habitat that would be needed or provided, and there is no determination of the short-term effects, particularly for accelerated restoration

Response: The National Forest Management Act (National Forest Management Act) requires that plans provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives (16 USC 1604 (g)(3)(B)). The 2012 planning rule requires that the Agency provide plan components to maintain or restore ecological conditions within the plan area to contribute to maintaining viable populations of species across their range while providing for social, economic, and ecological sustainability (36 CFR 219).

The final environmental impact statement includes an improved analysis of how the plan components would provide for the ecological conditions that contribute to maintain viable populations of at-risk species. There is no requirement to determine the quantity of habitat required for each species. More importantly, the best available scientific information is typically unavailable or is inadequate to determine the quantity of habitat that would be needed for each species of conservation concern.

Although the forest plan is programmatic and does not authorize specific projects, the discussion of short-term consequences of implementing the different alternatives has been improved in the final environmental impact statement.

4034

The descriptive vegetation-based desired conditions that describe resilient and sustainable vegetation conditions are desirable, however, the action alternatives immediately launch into describing single species management approaches for the Fisher, Owl and Marten including diameter limits. It is unclear why the revision has not been proactive in launching into a set of vegetation-based desired conditions for the owl, fisher, and marten but rather have instead gone back to the single species "no-touch" strategy.

Response: The final environmental impact statement and forest plan for the Inyo National Forest does not address the California spotted owl and fisher as these species are generally not found on this Forest.

The Sierra marten, however, is found on the Inyo National Forest. Desired conditions for the Sierra marten are found in the forest plan in chapter 2 (SPEC-SM-DC 01 through 03), which describes a reduced risk of high-severity wildfire, a trend in terrestrial and riparian vegetation toward desired conditions, and well distributed marten habitat across its range (which provides foraging, denning and resting habitat and movement across large landscapes). Not one of the Sierra marten desired conditions included in the final plan preclude activities or invoke "no touch" management of suitable Sierra Marten habitat. In addition, while guideline SPEC-SM-GDL 01 has been retained in the final plan and promotes marten core habitat retention, another additional vegetation based guideline has been added that both protects existing martin habitat and promotes action to increase preferred Sierra Marten denning habitat characteristics; "maintain or increase understory heterogeneity in marten denning habitat to promote hiding cover such as shrub patches, coarse woody debris, and slash piles following vegetation treatments. Design projects to have non-linear edges that unnaturally increase susceptibility to predation" (SPEC-SM-GDL 02).

4035

The draft environmental impact statement claims that wildlife protection measures like those contained in Alternative A and C impede restoration treatments and slow down the pace of projects, but these claims are not supported by evidence. Based on evaluation of projects in the northern Sierra Nevada (Dow et al. 2015), Herger-Feinstein Quincy Library Group project area, and in the Dinkey Collaborative Forest Landscape Restoration Project, logging projects are not impeded or slowed down by implementation of standards and guidelines that limit the size of trees to be harvested, establish canopy retention requirements for treated stands, entail survey requirements and limit operating periods (all measures intended to protect wildlife). Therefore, protection measures such as these should be incorporated into the preferred alternative.

Response: The scientific paper by Dow et al. 2016 (the paper was actually published in 2016) compares different simulated fire outcomes for the untreated condition, actual treated locations, and two alternate treatment scenarios. One of the alternate treatment scenarios was with typical "constraints" on the type and amounts of treatments in areas important to wildlife and in riparian area, similar to those proposed in alternative A, B and D. The other scenario identified treatment locations without such constraints. The simulation showed that for all treatment scenarios, the amount of hazardous fire potential, fire area, and emissions were reduced by about half compared to the untreated condition. A scenario that included more constraints on treatments such as more areas with limits on the diameter of trees that could be removed, an emphasis on only removing the smallest diameter trees, and using prescribed fire in lieu of mechanical thinning wherever possible, that would be similar to alternative C was not evaluated. In addition, the paper by Dow did not assess the feasibility of implementing the alternate scenarios it evaluated, especially the cost of implementing the scenarios and thus the likelihood that they might be developed, approved, and implemented.

However, this consideration is more relevant to forests on the west side of the Sierra Nevada. On the Inyo National Forest, the majority of forested landscapes that provide habitats for species such as California spotted owl and Sierra marten are located in designated wilderness, inventoried roadless areas, and areas where treatment opportunities are most limited by topography or access for equipment. The discussion in the final environmental impact statement has been updated to reflect these conditions on the Inyo National Forest where the consequences of plan direction that

provides for at-risk species similar to those described are not expected to be substantially different between alternatives.

4036

Include forest products in the table comparing alternatives in the Summary Document to help the reader understand the alternatives.

Response: Although forest products has not been added as an item in the final environmental impact statement Summary Document, forest products are compared among the alternatives in Table 8 of the final environmental impact statement (final environmental impact statement, volume 1, chapter 2, Comparison of alternatives, Comparison of alternatives for Benefits to People) displays amount of cut and sold volume of timber under each alternative.

A discussion regarding the impacts of each alternative to other forest products is included in chapter 3 of the final environmental impact statement (final environmental impact statement, Vol 1, chapter 3, Benefits to People and Communities, Forest Products and Ecosystem Services).

4037

The information in the environmental impact statement regarding the agreement with LADWP to stop all diversions on Parker and Walker Creeks incorrect and outdated, as is chapter 2: Air, Soil, and Water Resources of the INF Forest Assessment of 9/3/2013. Please refer to: 2013 Stream Restoration Agreement between MLC, DWP, CalTrout, and CA DFW. It is at the State Water Board now and DWP's licenses will be amended.

Response: The agreement with LADWP to stop all diversions on Parker and Walker Creeks is not referenced in the environmental impact statement or the forest plan. In the future, we will use the provided reference, when discussing flows on Parker and Walker Creeks. The 2013 Forest assessment was used as one reference for the final environmental impact statement, but more recent information and data was brought into the final environmental impact statement where needed.

4038

The large amount of dead and dying trees on the Forests (from fire, insect and disease, and logging) will have to be piled and burned in many cases due to the declining biomass power plant capacity in California; therefore, consider this in the analysis in the draft environmental impact statement.

Response: The need to pile and burn biomass due to lack of biomass power plant facilities is discussed in the environmental impact statement (chapter 3, Benefits to People and Communities, Environmental Consequences, “Consequences Specific to Alternative A” section). The sections that discuss the consequences specific to alternative B and B-modified explain that with increased pace and scale, it is possible that the consistent supply of biomass may increase biomass removal opportunities (chapter 3, Benefits to People and Communities, Environmental Consequences, Consequences Specific to Alternative B).

4039

The draft environmental impact statement fails to disclose the direct, indirect, or cumulative effects of Forest Service decisions that facilitate harmful uses of adjacent state and private land. The draft environmental impact statement lacks cumulative effects analysis regarding: the number of special use permits, right of way agreements, cost share road agreements and other authorizations in place and likely to be

approved; the direct, indirect, and cumulative environmental impacts of these authorizations; how these impacts would vary with alternatives; and mitigation measures the Forest Service will adopt to ensure that such authorizations are completed in a manner that minimizes environmental impacts and are otherwise in the public interest. The lack of this analysis is a violation of NEPA; therefore, include this analysis in the final environmental impact statement.

Response: The Forest Service has no regulatory authority over uses of adjacent state and private lands. The Forest Service is required to provide access across Forest Service lands to adjacent private landowners (36 CFR 212.6, 212.7(d)). Cumulative effects analyses in the final environmental impact statement take into consideration activities on adjacent lands, including private lands (chapter 3, Agents of Change, Insects and Pathogens, Cumulative Effects section; and each of the Revision Topic analysis sections contain effects analysis sections that address impacts of roads where appropriate). The National Environmental Policy Act regulations (Electronic Code of Federal Regulations, Title 40, Part 1501.7 - Scoping at https://www.ecfr.gov/cgi-bin/text-idx?SID=ea5aadf1017f25a968c2a687ccd8c378&mc=true&node=se40.37.1501_17&rgn=div8) require that for an environmental impact statement, the Forest Service should: "Determine the scope (section 1508.25) and the significant issues to be analyzed in depth in the environmental impact statement," and "Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (section 1506.3), narrowing the discussion of these issues in the statement to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere." The Inyo NF transportation system is covered under the Travel Management Rule, Subpart B decision and completion of a Travel Analysis Report under the Travel Management Rule, Subpart A. We have designated roads to be added into the National Transportation System (subpart B) and the minimum road network necessary to meet financial needs (subpart A). These decisions will not be changed in the final plan, or addressed in this planning process, so all alternatives under this analysis are the same in terms of the road system.

The road system, including minimizing associated impacts and restricting locations of roads, is addressed in the following plan components: WTR-FW-DC-05, INFR-FW-DC-01 and 03, GEO-FW-STD-01-02, MA-CW-GDL-03, MA-RCA-STD-18, MA-RCA-GDL-01, 02, 03, MA-PCT-STD-05, 06, MA-PCT-GDL-03, 04). The road system is also addressed in the monitoring plan (Inyo forest plan, chapter 4).

The Forest Service must follow regulations (36 CFR 212), policy (FSH 7709.56 and 57), and best management practices provided by the California Water Quality Control Board on all road-related projects, and National Environmental Policy Act requires that impacts be minimized to the extent practicable and the public is informed of management activities on Forest Service lands; therefore, the Forest Service has practices in place to ensure that road related projects are completed in a manner that minimizes environmental impacts, and that the public is informed and has opportunities to comment on road related projects. The type of documentation concerning road projects called for in the comment is more appropriately dealt with in project-level planning.

4040

The proposed land management plans for the Inyo, Sierra, and Sequoia National Forests fail to include plan components to eliminate or reduce impacts on adjacent, non-Forest Service system lands.

Response: National Forest Management Act requires that National Forests develop LRMPs to direct them to manage the natural resources and human uses of each national forest (final environmental impact statement, volume 1, chapter 1, Introduction, Regulatory Direction) The Inyo Final Plan is a document to guide management on National Forest land over which the Forest Service has management authority. In cases where land adjacent to the Inyo NF is being managed by the Inyo, this land has been specifically included in the final plan (for example, Nevada Enhancement Act Lands, portions of the Humbolt-Toiyabe National Forest administered by the Inyo National Forest) (see final environmental impact statement, volume 1, chapter 2, alternatives Considered in Detail, Features Common to alternatives B, C, and D, Nevada Enhancement Act Lands).

Although the plans focus on managing the land within Forest Service management authority (as required by National Forest Management Act), the development of the plan components and the final environmental impact statement analysis were done at the landscape scale considering the effects beyond the Inyo National Forest boundaries. A Bio-Regional Assessment was developed to provide a larger context to determine where the plans needed to change and what cross boundary drivers and stressors needed to be addressed. Desired Conditions were developed addressing management considering an all lands approach and partnerships were highlighted in the action alternatives to allow for management benefitting resources across boundaries. final environmental impact statement, chapter 3, Agents of Change: Climate, Fire, Insects, and Pathogens, Environmental Consequences to Fire Trends, Cumulative Effects for instance specifically states; “The draft forest plans emphasize an all-lands-management and shared-stewardship approach and this would occur with alternatives B, C and D (FIRE-FW-DC-04 to 05; LAND-FW-DC-02; TRIB-FW-DC-02; LOC-FW-DC-02; FIRE-FW-GOAL-02 to 03; LOC-FW-GOAL-02; VIPS-FW-GOAL-01). This includes the following potential management approaches:

Work with adjacent land management agencies to identify methods to reduce costs and increase effectiveness in restoring fire to the landscape.

Prior to and during the fire season assess conditional thresholds under which desired conditions can be met for the strategic fire management zones (see management areas section in this chapter). Work with Tribes and adjacent landowners to identify areas and resources of value considered in the assessments.

Develop a partnership and volunteer strategy to define the types of projects suitable for partnership and volunteer opportunities, potential partners and volunteers, and the mechanisms for developing partnerships and volunteer agreements.”

4041

Nowhere is the actual language of any standard or guideline associated with alternatives C or D provided, and absent that, it is impossible to gauge what such components would achieve

Response: National Environmental Policy Act requires that enough description of the alternative be provided to allow for a meaningful effects analysis. The final environmental impact statement chapter 2 explains the approaches that would be addressed by plan components for alternative C

and D in sufficient detail to allow meaningful analysis of the issues and indicators and their differing effects displayed in chapter 3.

4042

Please include a tabulation of the existing and proposed standards and guidelines in the environmental impact statement so that the public can understand how they their Forests will impacted by the proposed plan revisions.

Response: See response to Unique ID 4155.

4043

List the actual individuals that worked on the draft environmental impact statement and draft forest plans as well as their credentials

Response: A list of the preparers and contributors of the development of the environmental impact statement and Plan can be found in chapter 4 of the final environmental impact statement (final environmental impact statement, volume 1, chapter 4, Preparers, Consultation, and Coordination). Those listed include the Responsible Official, Core and Extended Interdisciplinary Team Members, and supporters to the Interdisciplinary Team.

Purpose and Need

4044

The draft environmental impact statement does not consider a reasonable range of alternatives and the purpose and need is too narrow.

Response: 36CFR (220.5(e)) states "The environmental impact statement shall document the examination of reasonable alternatives to the proposed action. An alternative should meet the purpose and need and address one or more significant issues related to the proposed action. Since an alternative may be developed to address more than one significant issue, no specific number of alternatives is required or prescribed.**"** Within the Inyo's final environmental impact statement a no action, and three action alternatives were analyzed in detail as well as 7 additional alternatives were considered but eliminated from detailed study. The proposed action circulated for scoping was adjusted based on public feedback. 36 CFR 220.5(e) states "The responsible official may modify the proposed action and alternative(s) under consideration prior to issuing a draft environmental impact statement. In such cases, the responsible official may consider the incremental changes as alternatives considered. The documentation of these incremental changes to a proposed action or alternatives shall be included or incorporated by reference in accord with 40 CFR 1502.21." As the final environmental impact statement discussed more than 11 alternatives that address public input and the issues identified (final environmental impact statement, volume 1, chapter 1, Public Participation, Issues), the final environmental impact statement complies with National Environmental Policy Act requirements for a full range of alternatives.

The purpose and need for the revised plan was developed based on the Assessments and resulting need for change. Public comment was sought and considered in the development of the final need for change resulting in the development of the purpose and need for the final environmental impact statement (see final environmental impact statement, volume 1, chapter 1, Purpose of and Need for Revising the Forest Plans, From Needs for Change to Revision Topics).

4045

The purpose of revising does not include a bullet mentioning timber management; however, timber is a topic in the design criteria and is mentioned as an issue and all alternatives assume some level of forest product removal (from draft environmental impact statement). Suggest including a statement acknowledging that the forest plan Revision is reviewing this aspect of forest management. Hiding it in "improving landscape resilience" and "reducing wildfire risk" does not elicit public trust. Acknowledge that there are economic reasons as well.

Response: The final environmental impact statement describes how the purpose and need was developed, and timber management was not identified as one of the three major revision topics (final environmental impact statement, chapter 1, Purpose of and Need for Revising the Forest Plan). However, Forest Products was identified as Issue 8 (final environmental impact statement, chapter 1, Issues section), showing that the need to provide Forest Products were considered a driver of the plan and its alternatives, and not only as a subset of landscape resilience or wildfire risk.

The forest plan includes multiple plan components addressing timber and other forest products in chapter 2, Social and Economic Sustainability and Multiple Uses, in the Timber and Other Forest Products section. In the desired conditions, timber harvest is addressed in TIMB-FW-DC 01 through 03. These include contributions to local economies, as well as social and ecological desired conditions.

In chapter 3 of the final environmental impact statement, Benefits to People and Communities there is a section entitled Forest Products and Ecosystem Services that address the subject of providing forest products and summarizes the current environment on the Inyo National Forest in terms of estimated available forest product quantities by alternative and the resources associated with harvest of those forest products.

4046

The "purpose and need" section demonizes high-severity fire while promoting logging despite the well- established findings showing that high-severity fire is essential and necessary to the ecological integrity of the southern Sierra. As a result, there are no alternatives that seek to promote returning fire to the landscape in the absence of logging in the majority of the Forest (i.e. away from human communities) while focusing fire suppression and fire preparation activities near human communities.

Response: The purpose and need statement in the final environmental impact statement addresses high intensity fire related to specific concerns. High intensity fire was addressed in the purpose and need statement in relation to:

- reducing the risk of large high-intensity wildfires to communities and assets (revision Topic 1);
- reduction of the risk of large high-intensity wildfire impacts to species and wildlife habitat (revision Topic 2);
- improvement of ecosystem resilience and to reduce the threat of wildfires to communities (Issue 1);
- loss or unacceptable damage from wildfires or insect attacks during droughts exacerbated by climate change (issue 2)

- general agreement by the public about the need to restore fire as an ecosystem function more widely on the forests (issue 3)

The purpose and need statement also addressed forest management related to thinning the Inyo National Forest in the following areas:

- Restoration of the resilience of vegetation and aquatic and riparian ecosystems (Revision Topic 2);
- Acknowledgement of the public conflict in values and viewpoint in relation to the amount, type, and location of thinning to improve ecosystem resilience to large, high-intensity wildfires (Issue 1) "There is concern about the methods we propose to manage the forest (the type and extent of management activities), particularly mechanical thinning, for restoring ecological resilience that are included in the proposed action."
- Amount of forest management activities and forest product outputs may not adequately contribute to sustaining local and regional industry infrastructure needed to accomplish restoration objectives. (issue 8)

Issue statements were used to drive alternatives. Alternative C was designed to address to emphasize more wildfire with less mechanical treatment (final environmental impact statement chapter 1, alternatives Analyzed, Alternative C). In this alternative achieving desired conditions relies more on restoring fire as a natural processes, such as using unplanned wildfire ignitions managed to meet resource objectives, as well as prescribed burning. Mechanical treatments (such as mechanical thinning, timber harvest, and fuels reduction) occur in order to move towards social, economic and ecological sustainability (a requirement of the 2012 Planning Rule), but acres suitable for timber productions would be less than those available in alternatives A, B, and D. In alternative C in both the wildfire maintenance zone and the general wildfire zone (zones outside wildland-urban intermix defense zone, which is the zone closest to communities) restoring the role of fire is important to achieve ecological sustainability and most wildfires in this zone would be managed to meet resource objectives under specific conditions and when it could be done in a safe manner (final environmental impact statement chapter 2, Alternative C, Strategic Fire Management Zones).

The final environmental impact statement chapter 2 Alternatives Considered but Eliminated from Detailed Study includes a list of additional alternatives that were considered but eliminated from detailed study. One alternative in this category included minimal mechanical treatment allowing natural fire to shape the landscape. This alternative was titled "Alternative Eliminated 4: Evaluate an alternative that has minimal active management and "let nature take its course" An alternative was suggested that has minimal active management of vegetation and allows nature to take its course in shaping the vegetation and conditions in the forest. It was suggested that wildfires would reduce built up fuels and regenerate forests while creating early seral habitats for species that depend upon them. It was also suggested that natural mortality would thin weakened trees leaving more resources for the remaining trees and vegetation.

4048

Based on the Notice of Intent, we expected to see new management direction in the draft forest plans to address the ecological integrity of meadow systems and to manage these ecosystems holistically. Unfortunately, the draft plans appear to include only

changes to desired conditions and no revised management direction, for instance, standards and guidelines, to improve meadow management.

Response: Although no new standards and guidelines were added in the 'Meadow' specific subsection of the final plan (final plan; volume 1; chapter 3; Management Areas; Riparian Conservation Areas; Meadows) many new standards and guidelines were added to other sections of the final plan that directly apply to meadow management:

1. New plan components (including standards) found in the Watersheds (WTR) section of the final plan (final plan; volume 1; chapter 2; Ecological Sustainability and Diversity of Plant and Animal Communities; Watersheds) cover the broad area of soils and water throughout the INF at the watershed scale. Watersheds include riparian conservation areas and the riparian and aquatic environments contained within them, such as rivers, streams, meadows, springs, and seeps. Newly added standards that have direct implications to meadow management include: WTR-FW-STD- 02; and 04.
2. Because many at-risk species utilize meadows in varying capacities; new plan components (including standards and guidelines found in the Animal and Plant Species (SPEC) and in the Sustainable Recreation (REC) sections of the final plan (final plan; volume 1; chapter 2; Ecological Sustainability and Diversity of Plant and Animal Communities; Animal and Plant Species, and final plan; volume 1; chapter 2; Social and Economic Sustainability and Multiple Use; Sustainable Recreation (excludes designated wilderness)) associated with habitat provide additional management direction that could pertain to meadows including: SPEC-FW-STD-01 (a variation of this was SPEC-FW-GDL 05 in Draft Plan) ; SPEC-FW-GDL-03 and 04; REC-FW-GDL-01; and 03.
3. Because a good majority of livestock grazing occurs within meadow habitat, new standards and guidelines found in the Rangeland Vegetation Types section of the final plan (final plan, volume 1; chapter 2; Social and Economic Sustainability and Multiple Uses; Rangeland Vegetation Types) provide management direction that pertains to meadow management including: RANG-FW-STD-01; 02; 03; 04; 05; 07; and 08.
4. New plan components (including standards and guidelines) found in the Conservation Watershed (CW) section of the final plan (final plan; volume 1; chapter 3; Management Areas; Conservation Watersheds) cover a specific subset of watersheds selected by a national forest managers to provide a refuge for continued high-quality water sources and the long-term persistence of at-risk species and have plan components similar to those of riparian conservation areas. Some of these particular standards and guidelines provide additional guidance for meadow management including: MA-CW-GDL 01; 02; and 03.

Multiple Use

4049

The proposed Plans do not adequately address the multiple use mandate of MUSYA, with an overemphasis on resource protection and "best available science" at the expense of other uses and expertise including, recreation, apiary placements, grazing, mining, and timber management; this violates the MUSYA direction to "best meet the needs of the American people." 16 U.S.C. section 531(a). Therefore, expand emphasis on multiple use by establishing a preference for accepting minor conflicts between uses in order to sustain multiple uses and include other relevant decision-making

factors including agency expertise, available relevant science, and social/economic benefits.

Response: The Multiple Use Sustained Yield Act (15 Public Law 86-517) states "it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Similarly, the 2012 planning regulations require that plans "provide for social, economic, and ecological sustainability." This is accomplished by including plan components, including standards and guidelines, "to guide the plan area's contribution to ecological, social, and economic sustainability."

The final plan has met the Multiple Use Sustained Yield Act and the 2012 Planning Rule because it includes plan components that provide for social, economic, and ecological sustainability, sustainable recreation, range, timber and other renewable and nonrenewable energy and mineral resources (final plan, chapter 2, Forestwide Desired Conditions and Management

The 2012 planning rule requires that the responsible official use the best available scientific information to inform the planning process and plan decisions. While the use of best available science information is integral and foundational for the planning process, it is not the sole influence on planning. Other sources of information, such as public comments, local and Tribal knowledge, agency experience, and monitoring data, were also considered throughout the planning process to inform the formulation of the final plan and final environmental impact statement.

The Inyo Plan was designed to retain existing management direction where it was still applicable and to address needs for change identified through the assessment and need for change development process both of which included public involvement. (Final environmental impact statement, chapter 1, Purpose of and Need for Revising the Inyo, Land Management Plan, Purposes of and Need for Revising the forest plan, From Needs for Change to Revision Topics). Emphasis areas identified in the need for change were considered as potential revision topics. Revision Topic 1 Fire Management) and Revision Topic 3 (Sustainable Recreation and Designated Areas) specifically address multiple uses (final environmental impact statement, chapter 1, Purpose of and Need for Revising the Inyo LMP, Purposes of and Need for Revising the forest plan, From Needs for Change to Revision Topics).

Meeting vastly differing opinions on what it means to "best meet the needs of the American people" is challenging. A way of clearly discerning these differences is through public involvement, collaboration and input. The Inyo engaged in a high degree of public involvement throughout the planning process to best assure that the final plan met the needs of the American people (See final environmental impact statement, chapter 1, Public Involvement).

Additionally different values or needs are represented through the different alternatives considered. (See 4044). The impacts of the various alternatives to the national forest uses mentioned (recreation, apiary placements, grazing, mining, and timber management) are addressed in the final environmental impact statement (final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences, section Revision Topic 3: Sustainable Recreation and Designated Areas; and Benefits to People and Communities). The effects disclosed in these sections were considered when making the final decision (see record of decision).

Finally, the 2012 Planning Rule emphasizes that forest plans are intended to guide management of the National Forests so they are ecologically sustainable and contribute to social and economic

sustainability while providing people and communities with a range of benefits, consistent with Multiple Use Sustained Yield Act (15 Public Law 86-517) and National Forest Management Act of 1976 (P.L. 94-588) (77 FR 21187; final environmental impact statement, chapter 1, Introduction, Regulatory Direction, Plan Revision Under the 2012 Planning Rule). As such, forest plans provide a framework for integrated resource management and for guiding project and activity decision making. Plan components themselves do not compel agency action, authorize projects or activities, or guarantee specific results. Instead, they provide the vision and strategic direction needed to move the Inyo National Forest toward ecological, social and economic sustainability (77 FR 21208; final environmental impact statement, chapter 1, Introduction, Regulatory Direction, Plan Revision Under the 2012 Planning Rule). This means that forest plans set up side boards for the work the Inyo does but it does not direct any specific place or project for that work.

4051

The focus of planning has changed from a focus on multiple uses to managing for single wildlife species and habitat protection, which has had a negative impact on the human aspect of the environment (social and economic) and the ability to appropriately manage the land with tools such as logging, grazing, control burning, and pesticides. The original intent of National Environmental Policy Act to find a balance between human and environmental needs has been lost in this transition.

Response: See responses to 4023 and 4049, which address how the final plan provides for multiple uses in compliance with Multiple Use Sustained Yield Act, National Forest Management Act, and the 2012 Planning Rule.

The purpose of the National Environmental Policy Act of 1969 as stated at section 2 of 42 USC 4321 is “To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the nation; and to establish a Council on Environmental Quality.” See responses to 4023 and 4049 for additional commentary to explain how the final plan provides an integrated approach to achieving balance between protecting the environment while stimulating social and economic benefits to humankind.

4052

Additional Wild and Scenic Rivers should not be designated under the final plan because such designations have the effect of impairing the multiple use objective.

Response: Congress designates Wild and Scenic Rivers. They are not designated in forest plans. The 2012 Planning Rule requires the agency to conduct an inventory of rivers and determine wild and scenic river eligibility and classification during land and resource management plan development or revision as outlined in the Wild and Scenic Rivers Act, Section 5(d)(1). A detailed description of the Wild and Scenic River evaluation process conducted by the Inyo during the development of the final plan can be found in the final environmental impact statement, volume 2, appendix C.

4053

Forest plan direction requires the forests to complete a comprehensive assessment of present and anticipated uses, the demand for, and supply and regeneration of

renewable resources, and this analysis has not been completed; therefore, complete this analysis prior to making a decision.

Response: Present and anticipated uses are discussed in the final environmental impact statement, particularly the forest plan appendix A in projected wood sale quantity and timber sale quantity. It shows the average volume outputs for the first and second decades for the Inyo planned timber sale program. The planned practices are based on the projected fiscal capability and organizational capacity of the planning unit, and not a commitment to take an action or to develop a project-specific proposal for such action.

Supply and regeneration of timber products in addressed in the final plan appendix E. It gives the sustained yield limit for the Inyo National Forest for lands that may be suitable for timber production as 40 millions of cubic feet (MMCF) per decade.

Demand for forest product on the Inyo National forest is addressed in the final plan appendix E. It states that forest management on the Inyo National Forest consists of restoration and fuels reduction treatments designed to achieve desired conditions for the associated terrestrial vegetation type on suitable timber lands. Most treatments would occur in the montane zone, with minor amounts in the upper montane zone. Thinning removes sawtimber and miscellaneous convertible products; however, due to proximity to existing mill facilities, most treatments yield fuelwood and specialty wood products.

4054

The forest plans fail to meet the economic needs of California's rural communities and the environmental impact statement fails to analyze this impact; therefore, revise the forest plan to address the social and economic needs of rural communities (through timber management and grazing) and revise the environmental impact statement to analyze economic and social impacts on rural communities.

Response: We value the local communities and recognize that recreation has an impact on rural communities, so we included Inyo County as a cooperating agency and have worked hard to incorporate priorities from a recreation collaborative.

Final environmental impact statement, chapter 3, Economic Conditions section, analyzes the potential effects to local communities resulting from changes in key forest benefits including recreation, water, grazing, air quality, biodiversity and energy production. It is very difficult to obtain reliable numerical estimates of economic or social effects at the community scale particularly for a programmatic analysis on a large scale plan. Therefore, this examination is a qualitative description of effects on local communities highlighting the differences between the alternatives. In addition, this section also highlights the current economic contributions of forest activities (such as grazing and forest visitation) and includes the contributions of local expenditures in forest management (such as spending on projects and Forest Service employee salaries).

4055

Include provisions in the forest plans to encourage and facilitate research and projects that focus on expanding multiple uses.

Response: Throughout the Inyo plan there are various plan components related to research including coordinating monitoring with research. Currently there is no plan component that explicitly focuses on research to expand multiple uses; however, research envisioned by the plan

components will provide vital information that will help determine if there is additional flexibility and resiliency within sustainable ecosystems that will allow additional use of the national forest.

Appendix C in the final plan further describes the Inyo's renewed partnership focus (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest). We recognize the value of continuing to develop effective partnerships, where we invite public participation, embrace stakeholder proposals, and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C includes; (1) additional partnership goals; (2) describes a partnership capacity assessment tool that will be used to help assess, sustain and improve our ability to work with partners and maintain the Inyo's long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

4056

Farm Bureau members are very concerned about their future ability to utilize the national forests.

Response: We are committed to maintaining the Inyo's distinctive role and contribution, a portion of which is to "offer many benefits both socially and economically, thus establishing a deep-rooted connection between this land and the people of the area." "Multiple uses on the Inyo National Forest are extremely important both socially and economically." "….other uses of the national forest, such as livestock grazing, mining and renewable energy, maintain some of the historic uses of this area while also providing to the local society, culture and economy. Livestock grazing has occurred on the rangelands of the Inyo National Forest since the late 1800s, and continues to be one of a variety of multiple uses on the Inyo. Grazing contributes to the economic and social well-being of people by providing opportunities for economic diversity, promoting stability for communities that depend on range resources for their livelihood, and by meeting the public needs for interrelated resource uses by providing livestock forage, wildlife food and habitat, outdoor recreation and other resource values dependent on range vegetation (see final plan, chapter 1, Introduction, Distinctive Roles and Contributions of the Plan Area).

4057

Mining and grazing was not discussed at public meetings.

Response: We did not identify mining and livestock grazing management direction as needing to change and therefore no new plan components were developed for these areas (Inyo, Sequoia and Sierra National Forests Need to Change Analysis-Supplement, June, 2014). However, plan components from the 1988 Land and Resource Management Plan and respective amendments were brought over into the final plan and allow for the continued use of these activities on the Inyo National Forest (final plan, chapter 2, "Rangeland Livestock Grazing" and "Geology and Minerals" sections). During the public meetings for the scoping process the areas identified as needing to change were reviewed with the public (Inyo National Forest public meeting information September, 2014).

Range of Alternatives/Alternative Suggestions

4058

The draft environmental impact statement did not consider a reasonable range of alternatives (general statements).

Response: See response to comment 4044 in the "National Environmental Policy Act" section.

4059

The vegetative conditions on the ground have changed due to tree mortality and mega fires and the alternatives are inadequate to effectively address this issue, therefore, revise the restoration strategies and treatments in the alternatives to address the changed vegetative conditions. Plans should include ways to reduce the occurrences and impacts of future infestation.

Response: Tree mortality and fires on the Inyo have been within normal ranges throughout the plan revision period therefore for the Inyo conditions have not changed since the plan was developed, and the draft environmental impact statement analysis drafted. The alternatives present different approaches to manage eastside ecosystems for resilience and sustainability. Ecosystem resilience is one of the three revision topics upon which the plan was designed. In the final environmental impact statement, chapter 2, a section titled "Revision Topic 2: Ecological Integrity Terrestrial Ecosystems Ecosystem Resilience and Adaptation to Climate Change" addresses each of the alternatives and how a plan would respond to the differing approaches. Increasing ecosystem resilience allows trees to be more resistant to insect attack. Desired conditions in the Inyo plan describes ecosystem types that are resilient serving as the goal for forest management (see Inyo Plan, chapter 2, Vision Terrestrial Ecosystems; for example, TERR-FW-DC-02)

4060

An analysis on critical aquatic refugees (critical aquatic refugees) was submitted in various stages of scoping and public feedback, as well as in-person with forest plan revision regional staff. The analysis was not properly reviewed by regional staff and incorporated in some capacity in the draft environmental impact statement, as there is no recognition of the continuous contribution or evidence in the alternatives.

Response: Comments and information submitted by the public have been reviewed and considered in the development of the alternatives. We may take information provided and once considered incorporate varying degrees of it into an alternative based on many factors including what would be feasible and complementary with other plan components, relationship to the purpose and need, Inyo-specific factors, adherence to the 2012 Planning Rule directives and intent, and many others. The recommendations provided on critical aquatic refugees were analyzed and it was determined that many of them did not occur on National Forest System lands or addressed species that did not occur within the range of the Inyo National Forest, or on the national forest; therefore we only recommended those critical aquatic refugees that occurred on National Forest System lands and for species that occurred on the Inyo within alternative C (final environmental impact statement, chapter 3, Aquatic and Riparian Ecosystems).

An alternative to identify critical aquatic refugees around areas of high aquatic species diversity was considered but eliminated from detailed study (final environmental impact statement, chapter 2, Alternatives Considered but Eliminated from Detailed Study Alternative Eliminated 3).

Alternative B-modified replaces critical aquatic refugees with conservation watersheds in response to public input, Issue 4 Watershed Restoration, and Issue 5 Aquatic Diversity (see final environmental impact statement, volume 1, chapter 1, Issues, Issue 4 and Issue 5 and final environmental impact statement, volume 1, chapter 2, Alternatives Considered in Detail; Alternative Development Process). New plan components were written for the conservation watersheds to provide for the long-term maintenance and restoration of functioning watersheds providing habitat for the persistence of species of conservation concern by maintaining connectivity and refugia for these species at the watershed scale more completely and at a larger scale than critical aquatic refugees (final plan, chapter 3, "Conservation Watersheds" section). Although critical aquatic refugees are not included in the final plan, the conservation watersheds that are included are a specific subset of watershed selected by national forest managers to provide for continued high-quality water sources and the long-term persistence of at-risk species. Each conservation watershed have been identified as a watershed that has a functioning or functioning at-risk rating based on the watershed condition framework (add citation); provide for connectivity of species of conservation concern; and provide high quality water for beneficial uses downstream. The management emphasis for conservation watersheds is to maintain or improve, where possible, the functional rating of these systems for the long term and to provide for persistence of species of conservation concern by maintaining connectivity and refugia for these species. The intent of conservation watersheds is to focus restoration and monitoring over the long term, while still allowing for other resource uses or activities within these areas (final plan, volume 1, chapter 3, Management Areas, Conservation Watersheds). Conservation watersheds are in alignment with the public inputs underlying intent of aquatic resource protection.

4061

All of the critical aquatic refugees added in alternative C are limited to areas within wilderness areas. The addition of these critical aquatic refugees will have little effect on management since limited management occurs in wilderness areas.

Response: A substantial number of critical aquatic refugees outside of wilderness were included in alternative C in the draft environmental impact statement and have been incorporated into the final environmental impact statement (final environmental impact statement volume 3, Maps, Critical Aquatic Refuges map, alternative C). Because they are outside of wilderness, management options are not limited by wilderness in those critical aquatic refugees. See response to comment 4060 for a discussion of how conservation watersheds replaced critical aquatic refugees in the selected alternative B-modified.

4062

Critically important aquatic areas that are located outside of wilderness areas, especially in lower elevations, were identified by the public and should be considered.

Response: See comment 4060.

In addition, critical aquatic refugees located outside of wilderness areas were considered, and included, in alternative C and alternative B (final environmental impact statement, volume 3, Maps).

4063

The environmental impact statement should include alternatives that address grazing.

Response: The final environmental impact statement alternatives were developed to address the need for change topics and the issues developed from public scoping. Grazing was not identified as an issue or need for change for several reasons: 1) grazing direction had been covered by recent plan amendments (2004 SNFPA); 2) the Inyo National Forest Assessment (2012) indicated the current management appears to be moving toward desired conditions; and 3) effectiveness monitoring of grazing direction is still being assembled (UCD); therefore, science is not "ripe" to make range a topic for need to change current grazing direction, so alternatives were not developed around grazing; however, modifications have been made to the final environmental impact statement to address grazing related concerns raised during the public comment period. Changes were also made to the section of the final plan that addresses grazing (final plan, chapter 2, "Rangeland Livestock Grazing" section). See also grazing related comment responses.

4064

The environmental impact statement should include an alternative that expands livestock grazing to currently vacant but suitable areas.

Response: The final environmental impact statement alternatives were developed to address the need for change topics and the issues developed from public scoping. Grazing was not identified as an issue or need for change through public scoping so alternatives were not developed around grazing. The forest plan identifies areas that are suitable, which can include vacant allotments. Determining which grazing allotments are utilized requires project-level site specific National Environmental Policy Act analysis.

4073

The draft environmental impact statement fails to adequately consider a range of practical alternatives for wilderness protection and forest management

Response: The final plan includes numerous desired conditions, guidelines, goals and suitability statements related to managing wilderness (final plan, chapter 3, "Designated Areas" section). In addition to forest plan guidance, there are individual wilderness plans that provide wilderness area specific, and there is a body of law (Wilderness Act), regulation (36 CFR 293), and policy (FSH 2309) not reiterated within the plan that also provides direction on wilderness management.

The final environmental impact statement, chapter 2, includes four action alternatives and seven alternatives considered but eliminated from detailed study. These alternatives provide different paths to achieve the purpose and need (final environmental impact statement, chapter 1, Purpose and Need for Revising the Forest Plans). Although areas of recommended wilderness varied by alternative the management direction for existing wilderness did not vary. The Need for Change Supplement when addressing wilderness concluded "Updated plan components would contribute to benefits to people by protecting opportunities for solitude and primitive recreation, as well as other benefits such as clean air and water, climate regulation, and maintenance of biodiversity." Management of existing wilderness was not identified through scoping as a significant issue that drove alternatives (See final environmental impact statement, chapter 1, "Issues" section).

Final environmental impact statement, chapter 2, also includes a comparison of alternatives section that outlines the different approaches to forest management in each alternative that detail numerically the differences across alternatives related to forest management. Alternative B-

modified strives to find a balance between the most aggressive alternative in terms of forest management (alternate d) and the least aggressive alternative (alternative c).

4074

The range of alternatives was inadequate to satisfy National Environmental Policy Act because: (1) the upper end of the range (between 52 and 100 percent of the final inventory) and intermediate alternatives are still missing, and (2) alternative C fails to include qualifying areas on the Sierra and Sequoia National Forests that the public recommended at scoping-all the areas that The Wilderness Society and California Wilderness Coalition, and other members of the public, recommended for wilderness designation during scoping and other relevant public participation opportunities. The Forest Service should analyze an alternative that includes all, or the vast majority of, the 1.45-million-acre inventory.

Response: We did consider an alternative that would include all of the areas identified by the public as recommendations for additions to the National Wilderness Preservation System (final environmental impact statement, chapter 2, "Alternatives Considered but Eliminated from Detailed Study" section). This alternative was dismissed from detailed analysis for two reasons:

The forest supervisor determined that it would be impracticable to manage such a vast wilderness area.

The impacts to other uses of the lands would be greater than the benefits provided by the additional wilderness area. Specifically, recommending all evaluated areas as wilderness would conflict with the identified need for change described in Revision Topic 3, "There is a need to provide sustainable and diverse recreation opportunities that consider population demographic characteristics; reflect desires of local communities, avoid overcrowding and use conflicts, and minimize resource damage; protect cultural resources."

4075

The range of alternatives was inadequate because none of the alternatives meets established fuel objectives and adequately reduce the risk of wildfire.

Response: An alternative was considered that would restore over half of the landscape within 10 to 15 years, using substantially more active vegetation management including thinning, selective harvest, and prescribed fire to restore forest resilience to fire, drought, insect and pathogen outbreaks and climate change as quickly as possible (final environmental impact statement, chapter 2, "Alternatives Considered but Eliminated From Detailed Study" section). This alternative was not considered in detail for several reasons that are discussed in the final environmental impact statement, including that it would require more workforce and budget than is feasible for the agency given budgets received in recent years. This alternative represents a large increase in vegetation management such as thinning, selective harvest, and prescribed fire to restore forest resilience to fire, drought, insect and pathogen outbreaks, and climate change. An alternative was considered in detail that would also increase the amount of fires managed to meet resource objectives that would reduce the risk of wildfire with undesirable effects (alternative D), but not to the degree of the alternative that was eliminated from detailed study. Alternative B-modified seeks to balance ecological, social and economic effects, and was designed to address heavy fuel loading, though to a lesser degree than alternative D. Rationale for choosing alternative b-modified to meet objectives is described in the record of decision.

4076

There are no alternatives that seek to promote returning fire to the landscape as a management tool and in the absence of logging in the majority of the forest (for instance, away from human communities) while focusing fire suppression and fire preparation activities near human communities.

Response: The forest plan has as a major goal, returning fire to its natural role as a part of a functioning ecosystem. Fire management is a key revision topic and is a significant issue that drove alternative development (final environmental impact statement, volume 1, chapter 1, From Needs for Change to Revision Topics, and final environmental impact statement, volume 1, chapter 1, Public Participation, Issues, Issues that Served as the Basis for Alternative Development, Ecosystem or Wildlife Issues, Issue 3 Fuels Treatment and Fire Management). Issue 3 particularly states that "[t]here is general agreement about the need to restore fire as an ecosystem function more widely across national forests."

Chapter 2 of the final environmental impact statement describes how the different alternatives approached fire management (final environmental impact statement, volume 1, chapter 2, Alternatives Considered in Detail). Each alternative took a different approach to fire management addressing strategic fire management zones, managing wildfire to meet resource objectives and smoke and air quality. Every alternative addresses protecting the safety of communities while varying to the greatest extent the approach on management of areas away from communities. Final environmental impact statement chapter 2, Comparison of alternatives section displays the differences across alternatives related to acres in different fire management zones. Alternative C has the most acres in the wildfire maintenance zone, which emphasized restoring the role of fire through managed wildfire and prescribed burning. Alternative C is also the only alternative with acres (over 1,000,000) in the general wildfire zone, which also emphasizes opportunities to management wildfire for resource benefits, encourages prescribed fire and has less treatment using mechanical methods. Final environmental impact statement, chapter 3, "Agents of Change" section, Comparison of Alternatives by Restoration Activities table) the estimated amounts of restoration activities by alternatives, which shows that alternative C has the most potential for prescribed burning and the lesser acres of mechanical treatment.

4077

The forest restoration goals pertaining to returning the natural fire regime and to forest stand demography with more large and fewer small trees are good but should be pursued more aggressively (than outlined in alternative B).

Response: See response to comment 4076 addressing returning natural fire to its role in the ecosystem.

The final environmental impact statement analyzed several alternatives that addressed the pace and scale of ecological restoration, which includes returning forests to the natural fire regime and forest stand demography (more large trees, fewer small trees). Alternative D emphasizes an increased pace and scale of restoration in response to the issues of improving resilience to fire, drought, climate change, insects and diseases, while enhancing economic and social sustainability (final environmental impact statement, chapter 2, "Alternatives Considered in Detail" section). This alternative was analyzed in detail (final environmental impact statement, chapter 2, "Comparison of Alternatives" section; final environmental impact statement, chapter 3). Rationale for choosing alternative B-modified to meet restoration goals is described in the record of decision.

4078

Include an alternative making prescribed fire and managed wildfire at a pace and scale commensurate with the pre-contact frequency and scale of fire in the Sierra Nevada ecosystem, and the key and primary tool to restore forests to a state of resiliency against climate change. Make all the necessary revisions to the forest plan guidelines, goals, standards, and desired conditions to empower and enable this understanding.

Response: See response to comment 4076 relating to alternative C, which maximizes the use of fire within the Inyo's capability to restore forest resiliency. Also see response to comment 4073, which addresses the requirement to plan within the Inyo's capability, putting sideboards on the breadth of treatments).

The final plan includes plan components for B-modified, which although it does not focus so heavily on fire as alternative C, also has a goal of returning to a more natural fire regime to improve ecological fire resilience and restore fire as an ecosystem process (final environmental impact statement, chapter 2, Alternative B-modified).

The final plan includes multiple components related to restoring fire frequency, including FIRE-FW-DC-01, FIRE-FW-GOAL 01 through 10, and FIRE-FW-GDL-01 and 02.

4079

Need alternatives that address limitations on achieving restoration objectives due to diameter limits.

Response: The final environmental impact statement analyzed effects of five alternatives, including alternative D. Alternative D eliminated diameter limits for tree removal. Analysis shows that alternative D would lead toward the greatest improvement in forest structure and resiliency (final environmental impact statement, chapter 3, Revision Topic 2 – Ecological Integrity, Terrestrial Ecosystems, Environmental Consequences to Vegetation Composition, Structure and Resilience). The analysis of other alternatives does acknowledge that diameter limits and other restrictions would lead to less improvement in stand structure and resiliency.

See 7114 and 7287.

4080

Alternatives include clear guidance regarding modification of current diameter limitations that would allow removal of larger trees to achieve restoration objectives and regeneration patches.

Response: See response to unique IDs 7284 and 7285.

4081

New equipment can be used on steeper slopes but erosion analysis needs to be performed

Response: Project-level effects of timber removal equipment on soils is analyzed at the project level, and thus an analysis on equipment effects on erosion are not included in the final environmental impact statement for the final plan.

4082

An alternative should be developed which provides enough timber volume to support industry infrastructure and ensure community stability and meet resource management goals.

Response: As noted in the "Benefits to People and Communities" section of the final environmental impact statement and the Economics Supplemental Report, timber activity on the Inyo National Forest is minimal, and the few, small commercial operations on the Inyo are restricted to producing fuelwood for local use. Haul distances of 600 miles to the closest mill (Terra Bella) are currently cost prohibitive. The final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management, shows the projected 10-year timber harvest volumes by product type and alternative. Most importantly though, the final environmental impact statement says, "Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products. As such, current and projected sawtimber opportunities on the Inyo National Forest are projected to remain at the current level."

4083

An alternative should be developed which does not pose unwarranted restrictions on management; for example, limit Wild and Scenic River designation expansion, upper diameter limits and arbitrary riparian buffers.

Response: Alternative D eliminates upper diameter limits, as requested in this comment. See response 7284.

The Forest Service 2012 Planning Rule specifically requires that during plan development or revision, river eligibility must be identified unless an inventory has been completed and no changed circumstances or new information warrant further review. This analysis does not vary by alternative. The rule also requires the Forest Service to manage those eligible and suitable rivers to protect the values that support their inclusion in the National Wild and Scenic River System until Congress makes a final determination on their designation. The act, policy, and court ruling above do warrant certain restrictions on management, including some restrictions in riparian buffer zones. See appendix C (Wild and Scenic Rivers Evaluation) of the final environmental impact statement. An additional 160 miles of river segments were identified by this evaluation and are included in all 4 alternatives (forest plan, chapter 1, Comparison of Alternatives by Designated Area).

The final environmental impact statement identified that, "there is a need to restore the resilience of vegetation and aquatic and riparian ecosystems to fire, drought and climate impacts; restore wildlife and plant habitat and diversity; and reduce the risk of large high-intensity wildfire impacts to species and wildlife habitat" (final environmental impact statement, chapter 1, Revision Topic 2). In the process to develop alternatives, we did not find that the removal of riparian conservation areas would continue to allow management to meet that need.

4084

All alternatives seem to be unrealistic in their goals for mechanical treatments and prescribed burns, especially alternative D. Given the budgets the U.S. Forest Service, and a Congress that is hostile to public lands, there is little hope that alternative D

could be implemented. Why choose a plan doomed to failure? Restoration projects should be prioritized to protect local communities and those recreation facilities that contribute most to local economies.

Response: Alternative D is an alternative analyzed in detail in the final environmental impact statement, but it has not been identified as the preferred alternative. The preferred alternative (alternative B-modified) would either not increase the amount of mechanical treatments or increase mechanical treatments just a little above current levels. Prescribed burning would increase from current levels just slightly (final environmental impact statement, chapter 2, "Comparison of Alternatives" section). The mechanism for restoration that would increase the most would be managed fire in appropriate areas that do not put values, including communities, at risk. The revised plan direction emphasizes active management using thinning and prescribed fire to reduce fuels within the wildfire protection zone (near communities and other values) (final environmental impact statement, chapter 2, alternative B-modified, Revision Topic 1).

A treatment cost comparison by alternative is included in the final environmental impact statement (chapter 3, Benefits to People and Communities, Forest Products and Management).

4085

The range of alternatives was insufficient because none of the alternatives would eliminate logging practices.

Response: An alternative was considered that would minimize active management and "let nature take its course" (final environmental impact statement, chapter 2, "Alternatives Considered but Eliminated from Detailed Study" section). This alternative would not meet the requirements of the 2012 Planning Rule, which requires plans to be developed that are ecologically, socially, and economically sustainable; is not consistent with the best available science; and would not meet various aspects of the purpose and need (final environmental impact statement, chapter 2, Alternatives Considered but Eliminated from Detailed Study). Alternative C was analyzed in detail and addresses the issues of improved ecological resilience by emphasizing the role of natural processes in forest restoration (final environmental impact statement, chapter 2, "Alternatives Considered in Detail" section). Alternative C would achieve desired conditions by relying on restoring fire as a natural process, such as managing unplanned wildfire ignitions to meet resource objectives, as well as prescribed burning. Mechanical treatments (such as mechanical thinning, timber harvest, and fuels reduction) also occur under alternative C in order to move towards social, economic and ecological sustainability, but acres suitable for timber production would be less than those available in alternatives A, B, and D.

4086

Develop a "pro-recreation" alternative that adequately addresses motorized recreation. Formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area

Response: The Inyo National Forest transportation system, including motorized recreation, is covered under the Travel Management Rule, subpart B decision and completion of a Travel Analysis Report under the Travel Management Rule, subpart A. We designated roads to be added to the National Transportation System for recreational purposes when the Travel Management Rule, subpart B decision was made. The Travel Management decisions will not be changed in the final plan, or addressed in this planning process. Sustainable recreation was identified as a revision topic for this planning effort (final environmental impact statement, chapter 1, from "Needs for Change section to Revision Topics" section). The final environmental impact

statement compares the alternatives relative to roaded recreation opportunity spectrum, and shows that alternative D has the highest percentage of roaded recreation opportunity spectrum (final environmental impact statement, chapter 2, "Comparison of Alternatives" Section). None of the recommended wilderness areas would occur in areas with system roads or trails and motorized use is prohibited on areas other than system roads; therefore, the motorized opportunities would not be reduced by any alternative.

4087

The environmental impact statement should include an alternative that includes protective management of inventoried roadless areas

Response: The final plan has been designed to be a focused document adding to, but not reiterating existing law, regulation and policy, consistent with the 2012 planning regulations (36 CFR section 219.2 (b) (2)). The 2001 Final Roadless Rule protects the social and ecological values and characteristics of inventoried roadless areas from road construction and reconstruction and certain timber harvesting activities (Special Areas, Roadless Area Conservation, Federal Register, volume 66, No. 9, Friday, January 12, 2001). No issues arose during scoping to drive an alternative related to additional protective measures for inventoried roadless areas; therefore, no alternatives were developed to provide more protections to IRAs.

4088

The environmental impact statement should include an alternative that includes direction on making the forest road system more ecologically and fiscally sustainable

Response: An ecologically and fiscally sustainable road system is required by the 2005 Travel Management Rule (36 CFR 212). We completed an assessment of the transportation system in November of 2016, as required by the Travel Management Rule, and this assessment is available online at https://www.fs.usda.gov/detail/inyo/landmanagement/planning/?cid=stelprd3834316. The 2012 Planning Rule requires that resource plans, such as travel management, be consistent with the forest plan (36 CFR 219.15(e)). Changes to the management of the transportation system was not identified as a need for change/revision topic in the final environmental impact statement, but ecological integrity is included as a need for change and may influence management of the road system (final environmental impact statement, chapter 1, Purpose of and Need for Revising the Forest Plan).

4089

The draft environmental impact statement should go further and guarantee specific, yearly, harvest levels. Guaranteed harvest levels are the only way to ensure that private industry will not only be viable, but that they will make the necessary investments to maintain and expand upon current infrastructure.

Response: As noted in the "Benefits to People and Communities" section of the final environmental impact statement and the Economics Supplemental Report, timber activity on the Inyo National Forest is minimal, and the few, small commercial operations on the Inyo are restricted to producing fuelwood for local use. Haul distances of 600 miles to the closest mill (Terra Bella) are currently cost prohibitive. The final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management, shows the projected 10-year timber harvest volumes by product type and alternative. Most importantly though, the final environmental impact statement says, "Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for

fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products. As such, current and projected sawtimber opportunities on the Inyo National Forest are projected to remain at the current level."

4091

The plans need to incorporate the active aging people, especially the increasing numbers of people over 60 years in age and their changing recreation needs and desires. The lack of analysis on this group and their needs and how these needs will impact forest management leaves the draft environmental impact statement without the full range of alternatives and a forest plan that does not adequately address variations in growth demands.

Response: Although the effects on this group are not analyzed in-depth, the forest plan seeks to address the need for a variety of recreation activities and a growing demand for such activities under each action alternative (B, C and D). The ability of the Inyo National Forest to sustain growing diverse recreational demands varies by alternative, but generally remain limited in alternative A and increase to some degree in all other alternatives (although wildfire risks vary and may threaten future availability of sustainable recreation to different degrees under each alternative). One civil rights concern expressed was that closure of roads through additional wilderness designation would limit groups such as seniors, children, and others who may rely on motorized vehicles to access areas. However, current, authorized uses of roads and trails will not change under any alternative. See the final environmental impact statement, chapter 3, Affected Environment and Environmental Consequences, Benefits to People and Communities.

4092

Alternative B is coherent, with all parts carefully considered. It would not be appropriate to create a hybrid alternative, formed from cherry picking parts of all alternatives. We could end up with a Plan that is not fully coherent and potentially contradictory.

Response: The final plan implements alternative B-modified, which is not a hybrid alternative, but has some additions and modifications from the draft plan. The structure of the final plan was also changed, to create a more readable and usable plan.

4093

Elements of alternative D should be incorporated into the preferred alternative B, such as the timing and extent of restoration, increasing the amount of thinning prior to prescribed burns, and faster reduction of stand density to avoid impacts intensified by drought. These actions would improve tree resilience, thereby protecting species habitats that are highly affected by high intensity fires. We note that alternative D also provides more opportunity for coordination with local communities for fire prevention.

Response: The rationale that the forest supervisor used to select alternative B-modified is included in the record of decision.

4094

Support the Sierra Club's Citizens Guide to Protecting the Inyo, Sierra and Sequoia National Forests, including the recommendations to give fire primacy, expand your

plans to include the wilderness recommendations on p. 18, and remove ecosystem segmenting roads.

Response: Fire management is identified as one of the revision topics in the need for change section of the final environmental impact statement (final environmental impact statement, chapter 2, "Needs for Change to Revision Topics" section). The fire management revision topics acknowledges the dual concerns related to fire of reducing risks to communities and allowing the increase of use of wildfire to manage for resource benefit.

We considered the public input provided at each step in the recommended wilderness evaluation process. Only a portion of the lands identified were found to be eligible for wilderness designation. An alternative that would have incorporated all suggested potential wilderness areas was considered but eliminated from detailed study (final environmental impact statement, chapter 2, Alternative Considered but Eliminated from Detailed Study). This alternative was eliminated from detailed study because:

1. The forest supervisor determined that it would be impracticable to manage such a vast wilderness area, and

2. The impacts to other uses of the lands would be greater than the benefits provided by the additional wilderness area. Specifically, recommending all evaluated areas as wilderness would conflict with the identified need for change described in Revision Topic 3, "There is a need to provide sustainable and diverse recreation opportunities that consider population demographic characteristics; reflect desires of local communities, avoid overcrowding and use conflicts, and minimize resource damage; protect cultural resources."

The determination of a fiscally and ecologically sustainable road system have been determined under the Travel Management Rule, subpart B decision and completion of a Travel Analysis Report under the Travel Management Rule, subpart A. We have designated roads to be added into the National Transportation System (subpart B) and the minimum road network necessary (subpart A). These decisions will not be changed in the final plan, or addressed in this planning process.

Alternative A

4095

No changes are needed from the current land management plans (alternative A) considering current conditions and available resources.

Response: The forest supervisor identified needed changes to current management, based on current conditions identified in the assessment, best available scientific information and other consideration, which are displayed in need to change documents (project record). These are summarized in the final environmental impact statement, chapter 1, "Purpose of and Need for Revising the Forest Plans" section. The Purpose and Need for the Plan Revision are also explained in that section. The forest supervisor did consider alternative A fully, and analysis of effects are displayed in chapter 3 of the final environmental impact statement. His rationale for not selecting alternative A is in the record of decision.

4096

The Forest Service attempts to tier the effects analysis to the 2004 forest plan analysis instead of providing a current analysis for alternative A. This is insufficient because at

the very least, the affected environment has changed since 2004. Popularity of over-snow vehicles (OSVs) has increased, and climate change has drastically changed the southern Sierra forests compared to 2004

Response: Alternative A is the no action alternative, or the consequences of retaining the existing forest plan without revision. There is an environmental consequences section and an affected environment section for each of the analysis areas, including a section that analyzes each alternative related to the affected environment for "Climate, Ecological Vulnerability and Adaptability." Alternative A in analyzed in each environmental consequences section, along with each action alternative (final environmental impact statement, chapter 3, "Environmental Consequences" section).

In response to concerns about winter recreation, including over-snow vehicles, a winter recreation opportunity spectrum map was developed for the final forest plan.

Climate change is addressed in final environmental impact statement in two sections specifically about climate change (final environmental impact statement, chapter 3, "Agents of Change" section; *and* chapter 3, Climate, "Ecological Vulnerability and Adaptability" section) as well as in context of the resources being analyzed (final environmental impact statement, chapter 3, "Environmental Consequences" sections for each resource analyzed). The environmental consequences for the no action alternative/alternative A are considered related to climate change in these sections.

4097

Support alternative A but also in support of proactive fire management actions described in other alternatives, as they would be mutually beneficial and coincide with holistic and sustainable watershed management practices in the Eastern Sierra.

Response: The final plan implements alternative B-modified, which altered the original alternative B. It continues some of the current management practices of the Inyo, though alters fire management practices and fire management zone classifications. The forest supervisor provides rationale for selecting alternative B-modified in the record of decision.

4098

A thorough discussion about alternative A needs to be included. What did alternative A expect to accomplish on the landscape versus what was actually accomplished? A thorough quantitative discussion needs to display how the individual forests would increase pace and scale to match the acreages called for in alternatives B, C and D.

Response: Alternative A is the no-action alternative, and would keep in place the management direction from the Inyo Land and Resource Management Plan, as amended. Alternative A establishes the baseline for which to compare the other action alternatives. Each environmental consequences section for each resource that is analyzed includes an analysis of the impact of continuing to implement the existing plan (Alternative A) on that resource (final environmental impact statement, chapter 3, "Environmental Consequences" sections for each resource analyzed). That analysis is based on experience of implementing the current forest plan. The Inyo National Forest Assessment discusses what the existing forest plan accomplished (available online at: https://www.fs.usda.gov/project/?project=3375), and informed the needs for change that informed the development of alternatives in this analysis. We developed the objectives for increasing pace and scale of restoration by considering what was completed in previous years under the current plan and evaluating how much that pace could be reasonably increased for

alternative B (See Objective Rationale documents in the project record). Other alternatives, such as alternative D, were developed in response to public scoping comments (final environmental impact statement, chapter 2, Alternatives Considered in Detail).

Alternative B

4099

The preferred alternative B is not sufficient in adequately managing the forest. Additionally, the planned timber sale program in alternative B is not sufficient to maintain the sawmill at Terra Bella

Response: Alternative B not only improves forest resiliency over the current direction (alternative A), it addresses many other multi-resource objectives. It emphasizes restoration and resilience of sagebrush habitats important to greater sage-grouse. It continues management of riparian conservation areas and critical aquatic refuges and recognizes priority watersheds as areas to focus restoration and maintenance efforts. It continues to address habitat needs and contributes towards recovery of federally listed species managed under the Endangered Species Act.

Within the community and general wildfire protection zones, large trees may be removed to address wildfire risks to communities and assets while still considering the overall desired conditions for large and old trees. Strategically located fuel reduction treatments along roads, ridgelines and connecting areas with lower fuels would support larger landscape-scale prescribed burning.

Alternative D (not selected) applies similar direction as alternative B but generally doubles the amount of areas treated. The record of decision explains how alternative B-modified best meets the Purpose and Need based on public input, analysis of the alternatives, and, it responds best to the issues (final environmental impact statement, Summary, chapter 1, Purpose of and Need for Revising the Inyo Land Management Plan).

As noted in the “Benefits to People and Communities” section of the final environmental impact statement and the Economics Supplemental Report, timber activity on the Inyo National Forest is minimal, and the few, small commercial operations on the Inyo are restricted to producing fuelwood for local use. Haul distances of 600 miles to the closest mill (Terra Bella) are currently cost prohibitive. The final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management, shows the projected 10-year timber harvest volumes by product type and alternative. Most importantly though, the final environmental impact statement says, “Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products.

4100

The final environmental impact statement should include changes to the preferred alternative from alternative C, such as designating some additional wilderness for each

forest, balanced with the increased vigorous fuels management and restoration activities of alternative D.

Response: The rationale that the forest supervisor used to select alternative B-modified is included in the record of decision. The final environmental impact statement, chapter 2, "Comparison of Alternatives" section summarizes and compares the different effects of each alternative to individual resources, including terrestrial ecosystems and fire management. The final environmental impact statement, chapter 3, "Agents of Change" section, Comparison of Alternatives by Restoration Activities table, compares the acres of mechanical treatments between alternatives. This shows that the treated acres under alternative D is greater than alternative B and alternative B-modified; however alternative B and B-modified were developed to balance the ecological, social, and economic effects with the recommendation of wilderness and mechanically treating areas to restore vegetation conditions. The record of decision also explains why alternative B-modified includes the four recommended wilderness polygons and not the greater number in alternative C. The process for identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System is further described in volume 2 of the final environmental impact statement, appendix B. The inventory and evaluation steps use the criteria set out in the Wilderness Recommendation Handbook (FSH 1909.12-2015-1, chapter 70). In the analysis step, the forest supervisor considers the areas evaluated and determines which areas were further analyzed for potential recommendation as part of one or more alternatives analyzed in the final environmental impact statement for the revised plans. Not all lands included in the inventory and subsequent evaluations were analyzed as potential recommended wilderness. The forest supervisor decided which areas were recommended for inclusion in the National Wilderness Preservation System based on the analysis and input from Tribal, state and local governments and the public. Those areas recommended for inclusion in the National Wilderness Preservation System are included in the record of decision.

4101

Increase the pace and scale of forest restoration treatment activities to help reduce forest density and increase forest resiliency to drought and increase the amount of forest products produced. Additionally, alternative D allows for flexibility in regards to using equipment near California spotted owl nests and increases areas that can be treated in the fisher habitats. Alternative D provides the most opportunity to utilize prescribed burning, especially to maintain areas previously treated, and to manage wildfire to meet resource objectives ultimately restoring fire as a needed ecological process.

Response: The rationale that the forest supervisor used to select alternative B-modified is included in the record of decision. Final environmental impact statement, chapter 2, "Comparison of Alternatives" section summarizes and compares the different effects of each alternative to individual resources, including terrestrial ecosystems and fire management. Final environmental impact statement, chapter 3, "Agents of Change" section, Comparison of Alternatives by Restoration Activities table compares the acres of mechanical treatments between alternatives. This shows that the treated acres under Alternative D is greater than alternative B and alternative B-modified; however, alternative B and B-modified were developed to balance the ecological, social, and economic effects with the recommendation of wilderness and mechanically treating areas to restore vegetation conditions.

4102

Provide the most opportunity to utilize prescribed burning, especially to maintain areas previously treated, and to manage wildfire to meet resource objectives ultimately restoring fire as a needed ecological process. Reduced risk of uncharacteristic wildfire provides community safety, reduced smoke, reduced interruptions to recreational opportunities, long-term benefits for ecological resilience of watersheds.

Response: All of the alternatives allow for prescribed burning and wildfire managed to meet resource objectives. Final environmental impact statement, chapter 3, "Agents of Change" section, Comparison of Alternatives by Restoration Activities table compares the estimated acres of these activities under each alternative. The record of decision explains the selection of alternative B-modified as the preferred alternative to balance ecological, social and economic considerations.

Alternative C

4105

The Forest Service should include in alternative C all the areas that The Wilderness Society and California Wilderness Coalition, the Sierra Club, and other members of the public, recommended for wilderness designation during scoping and other relevant public participation opportunities.

Response: We considered the public input provided at each step in the recommended wilderness evaluation process. Only a portion of the lands identified were found to be eligible for wilderness designation and only a portion of those eligible were recommended by the forest supervisor under each alternative for designation by Congress. We used the process and criteria described in Forest Service Land Management Planning Handbook FSH 1909.12-2015-1, chapter 70 – Wilderness (Wilderness Recommendation Handbook). See final environmental impact statement appendix B, Wilderness Evaluation, for details on wilderness findings for the recommended polygons.

We did consider an alternative that would incorporate all lands suggested as wilderness (final environmental impact statement, chapter 2, alternatives Considered but Eliminated from Detailed Study), but it was eliminated from detailed study for the following reasons:

The forest supervisor determined that it would be impracticable to manage such a vast wilderness area, and the impacts to other uses of the lands would be greater than the benefits provided by the additional wilderness area. Specifically, recommending all evaluated areas as wilderness would conflict with the identified need for change described in Revision Topic 3, "There is a need to provide sustainable and diverse recreation opportunities that consider population demographic characteristics; reflect desires of local communities, avoid overcrowding and use conflicts, and minimize resource damage; protect cultural resources."

4107

The Forest Service misrepresents alternative C's ability to produce effective fire outcomes of scale. The draft environmental impact statement (p. 72) fails to adequately assess and integrate the benefits of alternative C's fire treatments that focus on surface and ladder fuels while retaining higher canopy where needed for old forest species such as California spotted owl and Pacific fisher. As mentioned above, surface and ladder fuels contribute to 90 percent of fire behavior activity and allow for significant fire behavior change while limiting impacts on at-risk species. This is why PSW-GTR-220, p.24 called out treating surface fuels and thinning 10 to 16-inch diameter trees to

limit unwanted fire behavior results. A fire-focused alternative includes changes in Forest Service management emphasis, program budget shifting to fire use as a priority and performance criteria that supports managers who advance large scale fire use. Proper and unbiased construction of a fire-focused alternative cannot be tethered to the past ways of operating in a fire suppression culture.

Response: Alternative C was developed to address issues related to 1) ecological resilience, wildlife habitats and wildfire and 2) protecting aquatic diversity (final environmental impact statement, CH2 Issues that served for Alternative Development). Management focus in alternative C is on treating small diameter trees using mechanical and hand treatment with follow-up prescribed fire treatments. The benefits from the acres treated in alternative C (and all other alternatives) are addressed in the final environmental impact statement (CH3, Consequences Specific to Alternative C). There are fewer acres treated mechanically and with prescribed fire in alternative C than in alternatives B/D, alternative B-modified (final environmental impact statement, CH 2 Comparison of Alternatives by Restoration Activities). Under alternative C, mechanical fuel treatments would be strategically placed and focused in the wildland-urban intermix (WUI) zone and followed up with prescribed fire treatments. Removing fuels mechanically prior to prescribed burning would result in lower fire behavior. This would also minimize the threat of large intensity wildfires to communities. Mechanically treating fuels prior to prescribed burning is much more costly, minimizing the amount of acreage that can be treated based upon funding. In some cases, prescribed burning can occur without prior mechanical treatment, but would require more resources and smaller projects, also more costly. These treatments are focused on reducing fuels (surface and ladder fuels), however, there are less acres treated in alternative C as mentioned above.

Alternative C has three zones: The wildfire maintenance zone created from the results from the risk assessment (as in alternatives B, modified B and D); the general wildfire zone created by combining the results from the wildfire restoration zone, general wildfire protection zone, and portions of the community wildfire protection zone; and the wildland-urban intermix zone, which is the same distance-based zone as in alternative A (final environmental impact statement, CH 2 Revision Topic 1: Fire Management, Strategic Fire Management Zones). The wildland-urban intermix zone and wildfire maintenance zone have much less uncertainty when it comes to managing wildfires to meet resource objectives, which restricts the amount of fuels reduction treatments and fires managed to meet resource objectives in this alternative (final environmental impact statement, CH3 Environmental Consequences of Fire Management). The risk assessment analyzes historical fire and weather, and how different intensities of wildfire impact highly valued resources and assets (HVRAs). Zones created using the risk assessment reduce the amount of uncertainty and assist with prioritizing fuel treatment placement on the landscape (final environmental impact statement, chapter 3, Wildland Fire Management, Strategic Fire Management Zones in alternative C). Since alternative C only uses the results from the risk assessment for the creation of one zone, fuels treatments and fires managed to meet resource objectives are much more restricted under this alternative.

The fire management strategies for alternatives B, C, D, and modified B were developed using the three goals in the cohesive strategy. All alternatives have a range of how well they address these goals based on whether or not the risk assessment results were used and how aggressive the fuel treatments and fires managed to meet resource objectives are applied (final environmental impact statement, chapter 3 Wildland Fire Management, Analysis and Methods).

Alternatives B, C, D, and modified B have a full spectrum of fire management strategies ranging from full suppression (where fires are extinguished) to confine/contain and monitoring (where fires can be managed to meet resource objectives). All alternatives (except alternative A) are fire-focused and promote the management of wildfires to meet resource objectives and an increase in fuels treatments.

4108

More closely follow the natural fire regime for the different vegetation types and to reduce build-up of fuels by applying prescribed fire and managed fire on roughly 150,000 acres per year across the three forests.

Response: The 2012 Planning Rule requires the national forests to develop objectives based on reasonably foreseeable budgets (36 CFR section 219.7 (1)(ii)). The plan includes desired conditions for terrestrial ecosystem and vegetation types using the natural fire regime specific to those types (final plan, chapter 2, "Terrestrial Ecosystems and Vegetation" section). The plan also describes the objectives designed to move towards achieving the desired conditions (TERR-FW-OBJ 01-03). The final environmental impact statement chapter 3, Agents of Change Section, Comparison of alternatives by Restoration Activities table compares the number of acres estimated for treatment with the use of wildfire and prescribed fire between alternatives. These numbers were determined using current data on the ability to conduct prescribed fires and use wildland fires to meet resource objectives. The effects of these different treatment acres are described in the final environmental impact statement, chapter 3, "Fire Management" and "Ecological Integrity" sections.

4109

Provide assurances, through use of standards and guidelines, that habitat quality for at-risk species will maintain population viability or contribute to recovery.

Response: See response to unique ID 4110 below.

4110

Add standards and guidelines for logging and grazing to ensure that habitat is not degraded for species that are recognized as at-risk.

Response: Several additional standards (RANG-FW-STD 01 through 05; 07; and 08; MA-RCA-STD 11; 12; 13; 16; 17; and 18) and a guideline (RANG-FW-GDL 01) have been added, which mitigate project activity and grazing effects to at-risk species and there habitat.

Other species-specific additional standards (for instance, SPEC-SG-STD 01 through 15; SPEC-CSO-STD 01 through 05; SPEC-LCT-STD 01; SPEC-PCTR-STD 01;SPEC-GT-STD 01; SPEC-AMPH-STD 01) and guidelines (for instance, SPEC-SG-GDL 01 through 04; SPEC-SM-GDL 02; SPEC-CSO-GDL 01 through 11) provide further direction to ensure that at-risk species and their habitat are not degraded as a result of project activities or grazing.

In addition, SPEC-FW-GDL 05 was converted to SPEC-FW-STD 01 in the final plan making the incorporation of design features, mitigation, and project timing considerations a standard requirement when planning projects (for example, logging) that may affect occupied habitat for at-risk species.

4111

Add critical aquatic refuges to protect areas of high biodiversity and aquatic/riparian species that are at-risk.

Response: Alternative B-modified has taken a different approach to aquatic watershed protection through conservation watersheds. Alternative B-modified replaces critical aquatic refugees with conservation watersheds, to provide for persistence of species of conservation concern by maintaining connectivity and refugia for these species, at the watershed scale, more completely and at a larger scale than critical aquatic refugees (see final plan, chapter 3, “Conservation Watersheds” section. Also see final environmental impact statement, chapter 2, Alternatives, Alternatives Considered in Detail, Alternative B-modified: Preferred Alternative; and chapter 3, Revision Topic 2: Ecological Integrity, Aquatic and Riparian Ecosystems, Aquatic and Riparian Ecosystem Integrity, Environmental Consequences, Consequences Specific to Alternative B-Modified). Although critical aquatic refugees are not included in alternative B-modified, the conservation watershed approach is in alignment with public input regarding the intent of aquatic resource protection.

4112

Eliminate grazing from seeps, springs, fens and in meadows that are degraded.

Response: Although the plan does not eliminate grazing from seeps, springs, fens or degraded meadows, specifically, the following standards were added to the final plan to help achieve or maintain the desired conditions and to avoid or mitigate undesirable effects of grazing to seeps, springs, fens, meadows and other riparian conservation areas: RANG-FW-STD 02, 05, 07 and 08. MA-RCA-STD 09, 10 and 12 (final plan, chapter 2, Social and Economic Sustainability and Multiple Uses, Rangeland Vegetation Types).

These standards take into account the current conditions and will result in reduced utilization or removal of livestock as necessary to maintain functional riparian areas.

4113

Increase number of meadows improved or restored.

Response: The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on “how” the desired conditions outlined in the Plan are met, compel any particular action, authorize projects or activities, guarantee specific results, or specify or effect the type or source of the funding used to implement the final plan (36 CFR 219). Therefore, the plan itself cannot affect the rate of or number of meadows improved or restored.

4114

Alternative C calls for a purpose and need of "improving ecological resilience". Hand thinning, prescribed burning, and a reduction in mechanized thinning are not going to achieve this purpose. Recommendations: This alternative offers little or no value in moving the vegetation toward a desired condition of improved ecological resilience. The alternative doesn't even respond to its purpose and need ("improving ecological

resilience"). None of this alternative should be brought forward into the final preferred alternative.

Response: The Inyo forest supervisor has selected alternative B-modified. It does not include any portion of alternative. The record of decision explains why alternative B-modified was selected, which was to balance ecological, social and economic considerations.

Alternative D

4115

Alternative D increases the pace and scale of vegetation management actions but does not address the large scale tree mortality.

Response: Large-scale tree mortality is not as prevalent on the Inyo National Forest as the other west side Sierra forests. Tree mortality is being observed in red fir, whitebark pine, and pinyon on the Inyo National Forest (final environmental impact statement, chapter 3, Agents of Change, “Insects and Pathogens, Affected Environment” section). Alternative D was developed to address issues that the public brought forward during public scoping concerning forest resilience, fuels treatments and fire management, and output of forest products (final environmental impact statement, chapter 1, Public Participation, “Issues” section). To address these issues, alternative D proposes an increase to the intensity and amount of area that is treated (final environmental impact statement, chapter 2, “Alternative Development Process” section).

4116

While alternative D could double thinning, the timber sale program increase would not be great enough to increase wood supplies to sustain sawmill infrastructure. The National Forest Management Act of 1976 gives the Forest Service the ability to harvest timber on a sustained yield basis. This should be the objective of the Forest Service and the desired method of restoring our forests to the proper equilibrium. The draft environmental impact statement should go further and guarantee specific, yearly, harvest levels. Guaranteed harvest levels are the only way to ensure that private industry will not only be viable, but that they will make the necessary investments to maintain and expand upon current infrastructure

Response: As noted in the “Benefits to People and Communities” section of the final environmental impact statement and the Economics Supplemental Report, timber activity on the Inyo National Forest is minimal, and the few, small commercial operations on the Inyo are restricted to producing fuelwood for local use. Haul distances of 600 miles to the closest mill (Terra Bella) are currently cost prohibitive. The final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management shows the projected 10-year timber harvest volumes by product type and alternative. Most importantly though, the final environmental impact statement says, “Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products.” As such, current and projected sawtimber opportunities on the Inyo National Forest are projected to remain at the current level.”

In addition, although National Forest Management Act gives the Forest Service the ability to harvest timber on a sustained yield basis, the Planning Directives (FSH 1909.12) do not require the U.S. Forest Service to sell volumes equal to the sustained yield limit.

4117

Alternative D is simply unacceptable. It allows minimal protections and fire management is much too aggressive.

Response: Alternative D was not selected. The forest supervisor selected alternative B-modified. The rationale for this decision is provided in the record of decision.

Best Available Scientific Information

4118

Scientific literature that was provided during public engagement was not adequately addressed in the environmental impact statement or forest plans, the science used in the environmental impact statement and plans is often invalid, ignoring more relevant science, and the draft environmental impact statement contains many conclusory statements without analytical or scientific support; therefore, best available science needs to be reconsidered.

Response: The U.S. Forest Service is required to identify and use the best available scientific information (best available science information) to inform the planning process. The draft environmental impact statement, draft Plan, and supporting project record have been updated with better descriptions about the scientific information that was identified and used to inform the analysis and decision. In particular, the Best Available Scientific Information Summary Tables (released May 2016) have been updated from draft to final. Many of these updates are based on comments and suggestions received during the comment period.

The draft environmental impact statement and plan do not – and are not intended to – describe in detail every scientific perspective about a topic in the plan area. For many of the issues addressed in the draft environmental impact statement and plan there is a clear scientific consensus. However, for some issues there is not a clear scientific consensus (for example, uncertainty, opposing results). For some of these issues, this means identifying the lack of a clear consensus and including conflicting scientific information as best available science information when it is accurate, reliable, and relevant to the plan area. Other times, the conflicting scientific information is not included as best available science information because it is not accurate, reliable, and relevant to the plan area. The basis for this determination process is described in the Land Management Planning Handbook (FSH 1909.12 Zero Code, 07.12). Sources of best available science information can range from peer-reviewed articles (which are often considered the most accurate and reliable given the scientific rigor involved in the publication process), to grey literature (for instance, publications produced outside of traditional or academic channels), to unpublished data or expert opinion when peer-reviewed or other published sources are lacking or less relevant for a particular scientific subject.

While the best available science information is very important in the plan decision, it does not dictate what the decision must be. Other relevant factors may override the best available science information in the decision-making process. Other relevant factors used in this plan decision process can include: budget, legal authorities, traditional ecological knowledge, agency policies, public input, and the experience of land managers (Forest Service Handbook 1909.12 Zero Code, 07.1).

In addition, following the publication of the draft environmental impact statement, we chose to have a Science Consistency Review Report prepared (Ritchie et al. 2016) to assess the scientific

information used in the planning process. The report was written by a panel of U.S. Forest Service and external scientists. This report was a review of the scientific information presented in the draft environmental impact statement on the eight main ecological topics, with a focus on four sub-topics: (1) scientific relevance; (2) accurate and reasonable interpretation of scientific information; (3) acknowledgement and documentation of scientific uncertainty; and (4) identification of relevant management consequences. The outcomes from the report were provided to the planning team and used in revising the draft documents.

4119

Numerous publications that contradict the U.S. Forest Service's assertions and/or plan components are not addressed, despite being repeatedly provided to the agency.

Response: See response to comment 4118.

4120

The draft environmental impact statement refers to supplemental reports for more detailed discussion of the best available science, but some of these documents contain scientific information but do not discuss best available science, which is a requirement of NEPA; therefore, include a discussion of the best available science in the supplemental reports.

Response: The U.S. Forest Service has updated the project record since the draft environmental impact statement was released to better document the basis for the determination of best available science information. This basis for the determination of best available science information now includes a discussion of the accuracy, reliability, and relevance of the scientific information that was used for each scientific subject to inform the plan decision. Also see response 4118.

4121

The connection between information in the plan and best available science information is currently unclear, making it difficult for the public to assess whether best available science information has been incorporated appropriately; therefore, include more complete citations of best available science information sources on which specific parts of the plan are based.

Response: See response to comment 4120.

4122

The document title "Best Available Scientific Information Summary Tables" does not explain how the information was applied to any issues associated with the planning process or monitoring, but merely provides a P or an M for a list of literature, and it does not provide the rationale for how or why that information was determined to be the best to apply. This approach violates National Forest Management Act and National Environmental Policy Act and the Planning Rule.

Response: The Best Available Scientific Information Summary Tables (provided to the public May 2016 with the draft environmental impact statement and draft Plan) were not intended to explain how the information was applied. Rather, the Best Available Scientific Information Summary Tables (which have been updated since the draft version) identify ‘what’ is the best available science information and the record of decision includes a description of ‘how’ the best available science information was used to inform the plan decision. In other words, this a two-step process of identifying ‘what’ and then ‘how’. In addition, the environmental impact

statement provides a more detailed analysis of impacts for the alternatives based on the best available science information and the plan incorporates all of the decisions. Also see response to comment 4120.

4123

There is a paucity of available scientific data, especially with respect to species and habitat, to guide management. Given this lack of information, it is of utmost importance to manage the public lands with the strongest possible conservation and restoration approach in order to insure their sustainability.

Response: The planning documents used to prepare the forest plan contain hundreds of referenced scientific articles. From these references, a subset have been determined to be the best available scientific information and used to inform the plan decision. The basis for this determination process has been documented in the project record and is summarized in the updated best available scientific information Summary Table. As discussed in response 4118, sometimes there is not a not a clear scientific consensus on a particular subject. This can be due to a lack of data, uncertainty over the results, contradictions in scientific information, or many other reason. The U.S. Forest Service has done its best identify these instances as they relate to plan content and the basis for the determination of the best available science information. And while the best available science information is very important in making the plan decision, it does not dictate what the decision must be. Other relevant factors (for example, budget, legal authorities, traditional ecological knowledge, agency policies, public input and the experience of land managers) are also used in the decision-making process.

The management of the National Forest System is driven by the requirements of the National Forest Management Act using best available science information. Still, many other federal statues help guide their management, including: the Multiple-Use Sustained-Yield Act, Wilderness Act, Wild and Scenic Rivers Act, Clean Water Act, and Endangered Species Act. While these statutes may have different primary objectives, the sustainability of public lands to common between them.

4124

Neither National Forest Management Act, National Environmental Policy Act nor the 2012 Planning Rule has been met here because the draft plans and draft environmental impact statement fail to acknowledge and incorporate a vast amount of the best available scientific information (provided in the letters).

Response: See response to comment 4118.

4126

The public has not had a chance to completely review the best available science used for the plans because the science consistency "fact sheet" was not posted until July 7, and only refers to a future peer review/science consistency effort, which is not available for review during the comment period; therefore, ensure than the results of that review are documented in a way that demonstrates compliance with the Planning Rule's science requirements, and allow additional public comment time to review the peer review/science consistency effort.

Response: The public has had multiple opportunities to review the scientific information that has been used during the planning process. This includes: the Bio-Regional Assessment, Forest

Assessment, Science Synthesis, draft environmental impact statement, draft plan, and other supporting documents provided on the project website. The Best Available Scientific Information Summary Tables were made available to the public in May 2016 as a supporting document on the website. The Science Consistency Review Report was finalized December 8, 2016 (Ritchie et al. 2016). It wasn't made available to the public at that time, but it is now part of the project record. The responsible official electively chose to subject certain issues to this science consistency review by a panel of experts. It is not a requirement of National Environmental Policy Act or National Forest Management Act, and therefore, public comment was not requested. However, the outcomes of the science consistency review were incorporated into the environmental impact statement, final plan, and determination of best available scientific information, which are all part of the project record.

4193

All the designations, monitoring and good intentions of science is trumped by the will of politicians that do not vet their decisions through an environmental review process but rather through a legislative one. It therefore is of upmost importance for the agencies obliged to resource protection laws, and an engaged public, to anticipate the potential undermining of all good intentions and use the best of available peer-reviewed science.

Response: See response to to comment 4118.

Partnerships

4129

The plans did not fully evaluate options for partnerships to develop recreational opportunities and should include additional partnership related desired conditions. Fostering strong partnerships and cooperation between Forest Service employees and local communities, home owners associations, non-profit organizations, businesses, and other partners could reduce the economic burden on the Forest Service.

Response: The final plan includes partnership related plan components including desired conditions, goals, objectives and potential management approaches (listed below). Although additional partnership related desired conditions were not added to the final plan, new goals, objectives, and potential management approaches related to partnerships and collaboration were added (see bolded underlined plan components included in the list below).

Appendix C in the final plan further describes the Inyo's renewed partnership focus (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest. We recognize the value of continuing to develop effective partnerships, where we invite public participation, embrace stakeholder proposals, and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C includes; (1) additional partnership goals; (2) describes a partnership capacity assessment tool that will be used to help assess, sustain and improve the Inyo's ability to work with partners and maintain the Inyo's long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

<u>Plan Component List</u>

Desired Conditions: VIPS-FW-DC 01 and 02.

Goals: REC-FW-GOAL **01, 04, 05, 06, 07, 09, 10, and 11**; VIPS-FW-GOAL 01, 02, 03, 04, 05, 06, 07. 08, 09, and **10**.

Objectives: **REC-FW-OBJ 04; MA-GRA-OBJ 01**

Potential Management Approaches:
- Final plan, chapter 2, Forest Wide Desired Conditions and Management Direction, Social and Economic Sustainability and Multiple Uses, Sustainable Recreation, Potential Management Approaches, **bullets 6 through 9**.
- Final plan, chapter 2, Forest Wide Desired Conditions and Management Direction, Social and Economic Sustainability and Multiple Uses, Volunteers, Interpretation, Partnerships, and Stewardship, bullets 1 and 2.
- Final plan, chapter 3 Area-specific Desired Conditions and Management Direction, Management Areas, Sustainable Recreation Management Areas, Destination Management Area, Potential Management Approaches, **bullet 3**.

4130

Off-highway vehicle user groups are important recreational groups and should be involved in partnerships. Consider more fully developing partnerships with off-highway vehicle groups in the plans. A good example of this partnership is the state trail ranger programs similar to Idaho's program through the State Off-highway Vehicle Fund.

Response: See response to comment 4129.

4131

Use technology to enhance partnerships and public knowledge of and involvement with national forest land. The recognition and planned use of Digital 395 should be incorporated.

Response: The draft plan recognized the role of technology in partnerships and information sharing at VIP-FW-DC 02 (draft plan, chapter 2, Volunteers, Interpretation, Partnerships and Stewardships). However, the use of technology was more fully integrated into the final plan through the addition of a new Plan Component and Potential Management Approach (for instance, REC-FW-DC 10 and Potential Management Approach, bullet 6 found in the final plan, chapter 2, Social and Economic Sustainability and Multiple Uses, Sustainable Recreation).

The Digital 395 project will bring high speed Internet to local government, public safety entities, schools, libraries, and health care facilities and extending Internet service to additional residential and business customers throughout the project area. The Inyo will welcome and utilize any increase in internet speed that is appropriately obtained in compliance with federal law. The final plan includes a commitment to using available technology as described through the plan components and potential management approach cited above. Since the forest plan is intended to provide land management direction for 10 to 15 years (or longer), the final plan describes the use of “available technology” rather recognizing specific current technologies to allow for flexibility for the use of new or developing technologies as they become available over the life of the plan.

4132

Include partnerships with local groups and volunteers to help with wilderness trail maintenance and education about appropriate behavior in the wilderness in the forest plans.

Response: Although partnerships related to wilderness trail maintenance and education about appropriate behavior in the wilderness are not specifically addressed in the forest plan, plan components within the final plan envision and facilitate strengthening existing partnership relationships as well as developing new partnerships to accomplish the critical work of the Inyo National Forest (see response to comment 4129). Also see VIPS-FW-DC 03, which states, "Interpretation and conservation education materials and activities convey up-to-date and clear messages about natural resources… and responsible recreation use and etiquette…." and VIPS-FW-Goal-05 sets a forestwide goal to, "Work with skilled stewardship organizations in managing wilderness, wild and scenic rivers, national trails, and other designated areas".

4133

Include partnerships for trail maintenance (for instance, in general) in the forest plans.

Response: Although partnerships referencing general trail maintenance were not specifically addressed in the final plan, the final plan does include partnership-related plan components, including desired conditions, goals, objectives and potential management approaches, including newly developed (post-draft) goals, objectives, and potential management approaches related to partnerships and collaboration (see response to comments 4129 and 4132).

4134

Include partnerships with mountain biking groups for trail maintenance in the forest plans.

Response: Although partnerships with mountain biking groups for trail maintenance were not specifically addressed in the final plan, new goals, objectives, and potential management approaches related to the use of partnerships and collaboration were added (see response to comment 4129).

Appendix C in the final plan further describes the Inyo's renewed partnership focus (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest). We recognize the value of continuing to develop effective partnerships, where we invite public participation, embrace stakeholder proposals, and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C includes: (1) additional partnership goals; (2) describes a partnership capacity assessment tool that will be used to help assess, sustain and improve the Inyo's ability to work with partners and maintain our long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

4135

Include a goal and a desired condition to develop partnerships with stewardship organizations to resolve issues with unmanaged recreation.

Response: REC-FW-GOAL 01 was added to the final plan to express our intent to coordinate with partnerships and stewardship organizations early in project development to elicit

collaborative input on sustainable recreation opportunities, needs, and to identify potential conflicts.

Because the final plan is an integrated plan in which all plan components work together to achieve or maintain desired conditions and work together to meet the requirements of the 2012 Planning Rule (36 CFR 219.11), Goal REC-FW-GOAL 01 complements Desired Condition, MA-GRA-DC 07, which states "Conflicts between different uses are infrequent" (final plan, chapter 3, Management Areas, Sustainable Recreation Management Area, General Recreation Area).

Additional plan components included in the final plan that further promote partnerships that may help resolve recreation related conflicts include; goals VIPS-FW-GOAL-01, 04, and 05 provide the framework to establish partnerships with numerous groups to sustain forest benefits to people across the broader landscape, provide, maintain, and enhance, recreation opportunities, collect and manage recreation use, demand, and conflicts, and contribute to socioeconomic benefits associated with recreation and tourism. Our commitment to developing partnerships is also demonstrated in the final plan through the plan components cited above, and further highlighted in appendix C (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest).

4136

Match interest from volunteer groups to work efforts.

Response: Although matching volunteer groups' interest to work efforts was not specifically addressed in the final plan, appendix C in the final plan recognizes the value of continuing to develop effective partnerships and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C also particularly describes: 1) additional partnership goals; (2) a partnership capacity assessment tool that will be used to help assess, sustain and improve the Inyo's ability to work with partners and maintain our long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

Plan components related to partnerships included in the final plan are listed in response to comment 4129, components developed for the final plan (after the draft plan) are identified in **bold underline** in the list in response to comment 4129.

4137

Develop stewardship/partnerships with Tribes and other stakeholders for community support of new wilderness areas.

Response: The wilderness recommendation process is a separate but parallel process to the forest plan revision effort. The 2012 Planning Rule requires that during plan revision, the responsible official must, "Identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System (NWPS) and determine whether to recommend any such lands for wilderness designation (36 CFR 219.7(c)(2)(v))." A description of process can be found in chapter 70 of the Forest Service Land Management Planning Handbook 1909.12 (FSH 1909.12 chapter 70). The process for identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System is further described in volume 2 of the final environmental impact statement, appendix B. The process occurs in four primary steps: inventory, evaluation, analysis, and recommendation. Each step requires public participation that occurs at

multiple stages of the process. The inventory step identifies all lands in the plan area that may have wilderness characteristics as defined in the Wilderness Act. This step is intended to be reasonably broad and inclusive. The evaluation step evaluates the wilderness characteristics of lands in the inventory. The inventory and evaluation steps use the criteria set out in the Wilderness Recommendation Handbook (FSH 1909.12-2015-1, chapter 70). In the analysis step, the forest supervisor considers the areas evaluated and determines which areas were further analyzed for potential recommendation as part of one or more alternatives analyzed in the final environmental impact statement for the revised plans. Not all lands included in the inventory and subsequent evaluations were analyzed as potential recommended wilderness. The forest supervisor decided which areas were recommended for inclusion in the National Wilderness Preservation System based on the analysis and input from Tribal, state, and local governments and the public. Those areas recommended for inclusion in the National Wilderness Preservation System are included in the record of decision.

While developing stewardship/partnerships with Tribes and other stakeholders to specifically foster community support for the areas recommended for inclusion in the National Wilderness Preservation System in the final plan/record of decision is not specifically addressed in the final plan/final environmental impact statement, the final plan does include a broader commitment to developing partnerships with Tribes and other stakeholders in general, for example: TRIB-FW-DC 01 envisions the Inyo National Forest personnel developing a robust relationship with Tribes and related groups; TRIB-FW-DC 02 envisions the Inyo National Forest personnel coordinating with Tribes to manage cultural properties, resources, and sacred sites that historic preservation laws alone may not adequately protect; and VIPS-FW-GOAL 01 includes working with Tribes (along with other stakeholders) to sustain forest benefits to people across the broader landscape, which includes wilderness.

4138

Use partnerships to complete monitoring.

Response: We are open to the appropriate use of citizen science, and chapter 4, forest plan monitoring of the final plan explains that “project and activity as well as resource or species monitoring conducted by other agencies and organizations [who certainly are the Inyo’s partners] may inform the plan monitoring program and adaptive management of the plan.” The final plan further realizes efficiencies by coordinating monitoring across units, integrating agency protocols and leveraging partner and adjacent landowner monitoring work to accomplish the plan monitoring program. The plan monitoring program was developed to enable the responsible official to determine where changes are needed in forest plan components, other plan content, and implementation strategies that guide management. It provides a measure of management effectiveness and assess progress toward achieving or maintaining desired conditions and objectives through a set of monitoring questions and indicators. It provides the framework for conducting the monitoring, it does not provide any specific technique, entity, or action in which to accomplish the monitoring. This allows us the flexibility to pursue multiple means (including partnerships) in which to complete the monitoring.

4139

There should be definite and affirmative statements regarding the partnerships with the recreation special use permittees on each forest, and to re-affirm their importance in providing recreation services and facilities to the public.

Response: Although the plan is not designed to address the value and importance of the work of our partners and special uses, Desired Conditions Land-FW-DC 01 and 02 were added to the final plan to provide affirmative support of authorized activities and uses on National Forest System lands and promote compatible relationships between activities and uses on National Forest System lands.

Response to comment 4129 also addresses the high value the Inyo places on partnerships and how the plan promotes partnerships.

4140

Include partnerships for meadow restoration in the forest plans.

Response: Although developing or maintaining partnerships to accomplish meadow restoration was not specifically included as a plan component in the final plan, it is addressed in appendix B as a proposed and possible action; "Continue to work with partners to direct planning and implementation of meadow restoration projects where meadows have impaired hydrologic function" (final plan, appendix B, Aquatic and Riparian Ecosystems). The proposed and probable practices listed in appendix B are those that may take place on the Inyo National Forest at the project or activity level to help maintain existing conditions or achieve desired conditions described in the plan.

Additionally, the final plan includes goal WTR-FW-GOAL 01, which describes the goal to collaborate with partners (for example, Tribes, local, state and Federal agencies, adjacent landowners, and other interested parties) on watershed restoration (for example, meadow restoration) across ownership boundaries.

4141

Add a statement regarding the value, role and necessity of gateway communities within the Inyo National Forest.

Response: A goal was added to the final plan to "promote effective communication with gateway communities to help foster partnerships, inspire volunteers, educate the public and support stewardship including funding, implementation of projects and long-term maintenance of facilities" (REC-FW-GOAL 04). Reference to gateway communities has also been added to the Distinctive Roles and Contributions section of the plan (final plan, chapter 1, Distinctive Roles and Contributions of the Plan Area).

4142

Include partnerships with downstream water users for watershed restoration in the forest plans.

Response: Goal WTR-FW-GOAL 01 in the final plan envisions a landscape- or watershed-scale approach to watershed restoration through collaboration with Tribes, local, state and Federal agencies, adjacent landowners and other interested parties (including downstream water users) (final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Ecological Sustainability and Diversity of Plant and Animal Communities, Watersheds).

4143

Include in the forest plans an emphasis on standardized programs and education of unskilled and unsupervised volunteers to protect resources and ensure quality work. Partnerships should remain in an appropriate role and context to augment, but not replace, professional services.

Response: The Inyo plan has been designed to be a focused document adding to but not reiterating Forest Service law, regulation and policy. Forest Service Manual 1830 provides policy for managing the volunteer program, which address volunteer supervision, training safety among other things. That being said, the final plan includes a renewed focus on partnerships (final plan, appendix C) recognizing the important role partners may play, especially in times of flat or decreasing resources and budgets.

4144

Include in the plans a public education program with educational signage on the history, uses and proper treatment of individual national forests.

Recognize historic and current uses of the forest with educational signage and a means of educating the public on the proper use their lands.

Response: In the final plan, chapter 1, "Distinctive Roles and Contributions of the Plan Area" section it states: "Conservation education and interpretation programs focus on developing a land ethic as part of the recreation experience" demonstrating that public education is a key Inyo National Forest ethic. Additionally, LOC-FW-DC 05 addresses education opportunities related to culture, history and land stewardship, and provides ample opportunities to connect people, including youth, with nature. VIPS-FW-DC 03 addresses conservation education materials and activities convey up-to-date and clear messages about natural and cultural resources, climate change, land stewardship, responsible recreation use and etiquette, and Native American heritage and culture. VIPS-FW-DC 06 that addresses public educational opportunities and the nexus with management of cultural resources. CULT-FW-DC 03 addresses educational opportunities that connect people to the land and its history, which influence visitor behavior. VIPS-FW-GOAL 06 addresses working with partners and volunteers in the coordination, development, and delivery of educational and community outreach programs.

4145

Partnership standards in the plans should emphasize using local groups whenever possible rather than outsourcing projects to organizations outside of the local communities.

Response: The mission of the Forest Service is to "sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." Partnerships are essential to carrying out that mission today. Fortunately, there are hundreds of organizations in California, both within the local communities and beyond, whose missions overlap with the mission of the Forest Service in some way, creating the opportunity to work together toward bigger, and better outcomes than each can achieve on its own.

We recognize the value of continuing to develop effective partnerships to successfully leverage our resources by working in collaboration to achieve the desired conditions set forth in the final plan. There are endless opportunities to utilize partnerships with both local groups and organizations outside of the local communities to achieve the desired outcomes. The Inyo is committed to a renewed partnership focus. Appendix C of the final plan describes the goals, tools,

and best practices the Inyo will use to foster this new focus on cultivating partnerships (final plan, appendix C).

4146

Include in the plans specific details on how partnership relationships will be initiated, implemented and institutionalized.

Response: The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on "how" the desired conditions outlined in the plan are met.

With that said, the desired conditions and goals included in the final plan, chapter 2, Social and Economic Sustainability and Multiple uses, Volunteers, Interpretations, Partnerships and Stewardships (VIPS-FW-DC 01 through 06 and VIPS-FW-GOAL 01 through 10) provide the framework to encourage partnership development and use. The addition of VIPS-FW-GOAL 10 to the final plan further highlights the Inyo's commitment to partnership development.

In addition, appendix C of the final plan is included to describe the goals, tools, and best practices the Inyo will use to identify partnership opportunities, initiate new partnerships, leverage our collective resources, and achieve the desired outcomes outlined in the final plan (final plan, appendix C).

4147

Add text to appendix C, Renewed Partnership Focus, for the three national forests to show the Sierra Meadows partnership as a model example and the value of this partnership to the forests in assisting them in increasing the pace, scale and efficacy of meadow restoration and conservation.

Response: Although we value our partnership with the Sierra Meadows partnership and agree it is a great example of what a strong partnership can achieve, appendix C of the final plan is included to describe the goals, tools, and best practices the we will use to identify partnership opportunities, initiate new partnerships, and leverage our collective resources in order to achieve the desired outcomes outlined in the final plan (final plan, appendix C). Appendix C demonstrates our commitment to fostering partnerships, like the Sierra Meadows Partnerships; therefore, there is no need for additional support or examples to demonstrate their value. Appendix C in connection with the desired conditions, goals, and potential management approaches included in the final plan, chapter 2, Social and Economic Sustainability and Multiple uses, Volunteers, Interpretations, Partnerships and Stewardships (VIPS-FW-DC 01 through 06; VIPS-FW-GOAL 01 through 10; and Potential Management Approaches, bullets 1 and 2) provide the framework to encourage partnership development and use and inherently highlight the value of partnerships within the final plan.

4148

Use forward-looking forest management models that effectively utilize personal and corporate sponsorship funds in exchange for limited and visually acceptable sponsor recognition.

Response: The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on "how" the desired conditions outlined in the plan are met, compel any particular action, authorize projects or activities, guarantee specific results, or specify or effect the type or source of the funding used to implement the final plan (36 CFR 219). With that said, the Inyo is open to considering new management models, to implement the final plan, including sponsorships. Any sponsorship considered would comply with existing policy in Forest Service Manual 1580 and 2340.

4149

The final environmental impact statement must address the need for increased forest administrative capacity to approve and coordinate volunteer projects

Response: The final plan has been designed to be a focused document adding to, but not reiterating existing law, regulation and policy. Forest Service Manual 1830 provides policy for managing the volunteer program, which address volunteer supervision, training safety among other things. The final plan has been designed to allow implementation to occur within the bounds of the ever-changing forest capability as specified in the 2012 Planning Rule.

4150

Develop measurable and specific plan components that would guide implementation of partnership development, using some of the key messages within the partnership appendix as guidance.

The purpose of forest plans are to guide how National Forest System lands are managed, forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on "how" the desired conditions outlined in the plan are met.

With that said, the desired conditions, goals, and potential management approaches included in the final plan, chapter 2, Social and Economic Sustainability and Multiple uses, Volunteers, Interpretations, Partnerships and Stewardships (VIPS-FW-DC 01 through 06, VIPS-FW-GOAL 01 through 10, and Potential Management Approaches, bullets 1 and 2) provide the framework to guide partnership development and use. The addition of VIPS-FW-GOAL 10 to the final plan further highlights the Inyo's commitment to partnership development. appendix C of the final plan was included to further describe the goals, tools, and best practices the Inyo will use to identify partnership opportunities, initiate new partnerships, leverage our collective resources, and achieve the desired outcomes outlined in the final plan (final plan, appendix C).

4151

Add the following proposed action, "Participate in partnerships with utilities to programmatically manage cultural resources," to allow the U.S. Forest Service to

partner with easement holders who have similar compliance requirements. Draft programmatic approaches to meet shared compliance requirements and streamline the process for the U.S. Forest Service and stakeholders. Southern California Edison is very interested in more cost-effective clearances and a more defined definition would allow the utility to better partner with the U.S. Forest Service to achieve success.

Response: Although "participate in partnerships with utilities to programmatically manage cultural resources" was not specifically added to the final plan, the final plan would not prohibit the U.S. Forest Service from partnering with easement holders who have similar compliance requirements related to cultural resources. We recognize the value of developing effective partnerships to successfully leverage our resources and streamline common processes to achieve the desired conditions set forth in the final plan. There are endless opportunities to utilize partnerships with both local groups and organizations outside of the local communities to achieve the desired outcomes. The Inyo is committed to a renewed partnership focus as demonstrated in appendix C of the final plan. Appendix C describes the goals, tools, and best practices we will use to foster this new focus on cultivating partnerships (final plan, appendix C). The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on "how" the desired conditions outlined in the plan are met.

With that said, the desired conditions, goals, and potential management approaches included in the final plan, chapter 2, Social and Economic Sustainability and Multiple uses, Volunteers, Interpretations, Partnerships and Stewardships (VIPS-FW-DC 01 through 06, VIPS-FW-GOAL 01 through 10, and Potential Management Approaches, bullets 1 and 2) provide the framework to guide partnership development and use. The addition of VIPS-FW-GOAL 10 to the final plan further highlights our commitment to partnership development.

4152

Part 1: Partnership work should include stewardship, educational and interpretive programs, and science based projects. Part 2: The agency should utilize partnerships to develop comprehensive river management plans and wilderness directives. Part 3: On and off trail education techniques including adequate signage should be employed so that users understand the "Leave No Trace" approach.

Response: Part 1 and 2: The final plan includes partnership-related plan components including desired conditions, goals, objectives and potential management approaches that were brought forward from the draft plan (Included in those listed below – not in bold or underlined). And although components specifically associated with utilizing partnerships to develop comprehensive river management plans and wilderness directives were not specifically addressed or added to the final plan, other new goals, objectives, and potential management approaches related to partnerships and collaboration were (see bolded underlined plan components included in the list below).

<u>Plan Component List</u>

Desired Conditions: VIPS-FW-DC 01 and 02.

Goals: REC-FW-GOAL 01, 04, 05, 06, 07, 09, 10, and 11; VIPS-FW-GOAL 01, 02, 03, 04, 05, 06, 07. 08, 09, and 10.

Objectives: REC-FW-OBJ 04; MA-GRA-OBJ 01.

Potential Management Approaches:
- Final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Social and Economic Sustainability and Multiple Uses, Sustainable Recreation, Potential Management Approaches, bullets 6 through 9.
- Final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Social and Economic Sustainability and Multiple Uses, Volunteers, Interpretation, Partnerships, and Stewardship, bullets 1 and 2.
- Final plan, chapter 3 Area-specific Desired Conditions and Management Direction, Management Areas, Sustainable Recreation Management Areas, Destination Management Area, Potential Management Approaches, bullet 3.

Appendix C in the final plan further describes our renewed partnership focus (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest). We recognize the value of continuing to develop effective partnerships, where we invite public participation, embrace stakeholder proposals, and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C includes (1) additional partnership goals; (2) describes a partnership capacity assessment tool that will be used to help assess, sustain and improve our ability to work with partners and maintain our long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

Part 3: Plan components (final plan, REC-FW-DC 09; REC-FW-DC 10; and VIPS-FW-DC 03), potential management approaches (final plan, chapter 2, Social and Economic Sustainability and Multiple Uses, Volunteers, Interpretation, Partnerships and Stewardships, Potential Management Approaches, bullets 3 and 4), and a proposed and possible action (appendix B: Proposed and Possible Actions, Cultural Resources, bullet 1) that address visitor information services and the use of on and off-trail education and interpretive techniques (including signage) to educate and promote responsible uses (such as the “leave no trace” approach) and protection of natural resources were carried forward from the draft plan into the final plan.

Additionally, plan component (REC-FW-GOAL 06), and potential management approaches (final plan, chapter 2, Social and Economic Sustainability and Multiple Uses, Sustainable Recreation, Potential Management Approach, bullets 5, 6, and 9) were developed and added to the final plan to further address responsible and sustainable recreation practices (Inserted below).

New Goal

REC-FW-GOAL 06: Collaborate with a variety of partners to provide stewardship and interpretive services that enhance responsible recreation and increase knowledge of related socioeconomic and environmental issues.

New Potential Management Approaches:

Bullet 5: Use information signs to inform the public on trail etiquette, wildlife awareness, and other responsible behaviors.

Bullet 6: Use available technology, interpretive messages and interactions, and partnerships to educate national forest users and develop sustainable recreation opportunities that are focused on

the long-term sustainability of the land, animals, fish, and plant species that support a healthy forest ecosystem."

Bullet 9: Use trail head hosts or volunteer patrollers to educate and interact with the public to promote responsible and sustainable public use practices."

Forest Plans

4154

There is too much reliance on desired conditions, which provide vague guidance, therefore, develop more standards and guidelines that are more specific and develop more measureable objectives.

For example, develop measurable protective standards to prevent damage from salvage logging, grazing, off road vehicles and other threats

More standards, guidelines, and objectives were developed and added to the final plan to provide better guidance to help achieve or maintain the desired conditions, to better avoid or mitigate undesirable effects, and to better meet applicable legal requirements. A summary of the changes made between the draft plan and final plan are summarized in the record of decision.

4155

The Forest Service must provide a clear tabulation of all standards and guidelines in the existing forest plans with a concordance showing how each of these relates to the revised standards and guidelines for the proposed plans

Providing a clear tabulation of all of the plan components from the existing forest plan that were brought forward into the new final plan or how the existing plan components relate to the components included in the new final plan is not a requirement of the 2012 Planning Rule (36 CFR 219). The 2012 Planning Rule rather, requires that we develop a revised plan that meets the procedural and substantive requirements of the 2012 rule. Components of the new plan can include adopting previous direction and new or modified direction as identified through the need for change evaluation (see final environmental impact statement, volume 1, chapter 1, "Purpose and Need for Revising the Forest Plan" and "Public Participation" sections).

A conversion (for instance, crosswalk) document was developed early in the forest plan revision planning process and used during the initial evaluation of which aspects of the existing plan should be brought forward. As planning progressed, additional changes to components that were kept, modified, or deleted occurred in order to remove redundancies, better align the plan components and language with the 2012 Planning Rule requirements, integration of plan components, and public comments. Changes made to the "conversion (for instance, crosswalk)" document were not tracked, as that would have been a pretty large undertaking that is not required. Nonetheless, this "conversion (for instance, crosswalk)" document may provide the best demonstration of how the existing forest plan was incorporated into the new final plan.

4156

The plan does not comply with Federal Plain Writing Act of 2010 or E.O. 12866 and E.O. 12988, which says that each regulation must specify its effect "in clear language". (Sec. 3 Par. (b)(2)).

It is challenging to address complex natural resource issues clearly and understandably, although efforts are constantly being made to achieve that goal. The final plan and final environmental impact statement have been revised to make both more clear and readable, including in specific areas that were identified by the public to be lacking in clarity. Specific feedback on where the draft plan or draft environmental impact statement were lacking in clarity is useful. A summary of the changes made between the draft plan and final plan, including areas that were clarified or strengthened are summarized in the record of decision.

4157

The revised forest plans should contain the following additional or revised plan components and other plan content regarding air quality:

Desired conditions -- The air quality value of visibility in class I air sheds reflects the air quality outcomes of a natural functioning forest ecosystem where regular fire plays a critical role in forest resilience and emissions reductions in California.

Goals -- The Forest Service will engage air regulators, policy makers and the public in the state level planning efforts aimed at increasing carbon stability, carbon sequestration and limiting CO2 emissions in California's forests.

Include modeled or measured evaluations of emissions trade-offs in project level planning for prescribed fire and reporting related to decisions to manage natural ignitions for multiple resources objectives.

The Forest Service and other fire memorandum of understanding partners along with interested stakeholders engage the public health community to establish a health alert notification system to provide information to local physicians, public health officials, school nurses and at-risk citizens regarding burn plans, ignition timing, and resource and long term public health benefits from well-managed prescribed fire and managed wildfire programs.

Response: AIR-FW-DC 01 and 02 in the final plan describe desired conditions comparable to the suggested desired condition you provided.

The air quality value of visibility in a class I airshed is maintained or improved to the natural background condition specified in the California Regional Haze State Implementation Plan.

Wildland fuel loadings resemble natural range of variation conditions, reducing the potential for harmful effects on air quality from high intensity wildfires.

The plan also contains language similar to the recommended goal in relation to evaluating trade-offs at the project-level. The following potential management approach is included in the final environmental impact statement: Include smoke tradeoff evaluation in project-level planning comparing local (for example, prescribed fire) and regional (for example, wildfire) scales. Use existing scientific information on large wildfire emissions. Consider downwind communities at the local and regional scale (final plan, chapter 2, “Air Quality” section).

As recommended, a goal was added addressing the need for the Inyo to engage with the States and public in any state-level planning efforts related to air quality (AIR-FW-GOAL 05).

The final recommended goal was not included in the final plan because there is plain language that already addresses this concern: “Provide early notification to the public about potential smoke from fire activities to promote awareness and protect human health and safety” (AIR-FW-GOAL 03) as well as “Coordinate with other jurisdictions such as communities, Tribes, service providers, and Federal, state, county, and local entities regarding prevention, preparedness, planned activities, and responses to wildland fires. Notify those agencies about upcoming and ongoing fire seasons and any prescribed fire activity” (FIRE-FW-GOAL 06).

4158

Federally listed species are only identified in the draft environmental impact statement, the draft plans do not identify the specific at-risk species they were designed to protect. Include an appendix that lists the at-risk species the plans were designed to address.

Response: A list of at-risk species is not included within the forest plan because this list is subject to change throughout the life of the plan. These changes can occur to the threatened, endangered, or proposed species list under the Endangered Species Act or to the regional forester’s list of species of conservation concern (SCC). For example, the bi-state distinct population segment of the greater sage grouse was a candidate species for Endangered Species Act listing until April 21, 2015, then U.S. Fish and Wildlife Service determined that the bi-State population of greater sage-grouse does not require the protection of the endangered species act (USFWS News Release April 21, 2015). Plan components were developed to provide for ecological conditions necessary to maintain viable populations of species of conservation concern (final plan, chapter 2, “Terrestrial Ecosystems” and “Vegetation and Animal and Plant Species” sections). It is in the draft environmental impact statement and then final environmental impact statement, where all at-risk species are listed and evaluated in the effects analysis in chapter 3, including evaluating the adequacy of plan components to provide the ecological conditions for species persistence.

4159

The role of "potential management strategies" needs to be clarified in the draft plans. The Forest Service is increasing flexibility and avoiding actually making decisions at the plan level through extensive use of "potential management approaches.”

Response: The description of the role of potential management approaches has been added to the final plan (see final plan, chapter 1, Plan Components). Only plan components are required by the 2012 planning rule, which include: desired conditions, objectives, standards, guidelines, and suitability of lands (goals are included as optional plan components). These five (six) plan components, however, do not specifically prevent any action, project, or activity from occurring on the Inyo, nor do they compel any action, project, or activity to occur (final plan, chapter 1, Introduction, Purpose of the Forest Plan). Plan components do not specify particular methods on “how” the desired conditions outlined in the Plan are met. While potential management approaches are not plan components and rather are defined as “optional content in the plan” (36 CFR section 219.7(f)(2)), they are included to describe the principal activities and program priorities the responsible official intends to use to carry out projects and activities developed under and in compliance with the plan. Potential management approaches can convey a sense of priority for management to emphasize. They are used to describe the principal strategies and program priorities the responsible official intends to use to carry out projects and activities developed under the plan. Management approaches may discuss potential processes such as analysis, assessment, inventory, project planning, or monitoring. In other words, they provide insights into “how” desired conditions of the plan may be met or indicate the future course or

direction of change that wouldn't otherwise be provided by the plan (final plan, chapter 1, Plan Components).

4160

Potential management approaches makes it confusing what the plan requires and what is entirely optional. The analysis of effects in the draft environmental impact statement generally presents the potential management approaches as plan components.

Response: While potential management approaches are not plan components and rather are defined as "optional content in the plan" (36 CFR section 219.7(f)(2)), they are included to describe the principal activities and program priorities the responsible official intends to use to carry out projects and activities developed under and in compliance with the plan. Potential management approaches can convey a sense of priority for which management to emphasize. They are used to describe the principal strategies and program priorities the responsible official intends to use to carry out projects and activities developed under the plan. Management approaches may discuss potential processes such as analysis, assessment, inventory, project planning, or monitoring. In other words, they provide insights into "how" desired conditions of the plan may be met or indicate the future course or direction of change that wouldn't otherwise be provided by the plan (final plan, chapter 1, Plan Components).

Modifications were made to the plan components included in the final plan to ensure components better met the definition of each plan component type or other plan content (for example, potential management strategies) as defined in the 2012 Planning Rule (36 CFR 219). Modifications included changing plan components from one type to another or to other plan content. For example, a guideline changed to a standard or a goal changed to a potential management approach).

The analysis of alternatives summarized in chapter 3 of the final environmental impact statement includes the assumption that "…potential management approaches would influence collaborative efforts and be considered in developing programs of work" (final environmental impact statement, chapter 3, Introduction, Science and the Assumptions Used in the Environmental Analysis). As such, potential management approaches are discussed accordingly throughout the final environmental impact statement.

4161

Many potential management approaches are written as if they should be plan components, and there is no rationale provided for why they are not.

Response: Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. Plan components work together as a whole to achieve or maintain desired conditions. Only five plan component types are required by the 2012 planning rule; desired conditions, objectives, standards, guidelines, and suitability of lands (goals are included as optional plan components). These plan components do not specifically prevent any action, project, or activity from occurring on the Inyo nor do they compel any action, project, or activity to occur (final plan, chapter 1, Introduction, Purpose of the Forest Plan). Plan components do not specify particular methods on "how" the desired conditions outlined in the Plan are met.

While potential management approaches are not plan components and rather are defined as "optional content in the plan" (section 219.7(f)(2)), they are included to describe the principal activities and program priorities the responsible official intends to use to carry out projects and activities developed under and in compliance with the plan. Potential management approaches can convey a sense of priority for which management to emphasize. They are used to describe the principal strategies and program priorities the responsible official intends to use to carry out projects and activities developed under the plan. Management approaches may discuss potential processes such as analysis, assessment, inventory, project planning, or monitoring. In other words, they provide insights into "how" desired conditions of the plan may be met or indicate the future course or direction of change that wouldn't otherwise be provided by the plan.

4162

The term "potential management approaches" cannot be used to establish that the forest plan has met the requirements for sustainability, plant and animal diversity, multiple use, and timber as directed by the planning rule (36 C.F.R. 219.7).

Response: The final environmental impact statement, chapter 1, Other Plan Components, discusses how potential management approaches fit into the context of the plan. Management approaches are used to identify how the decision-maker would respond to enhanced resources or other efficiencies that would facilitate attaining desired conditions. Management approaches describe the principal strategies and program priorities the decisionmaker intends to employ to carry out projects and activities under the plan. Our staff relies on the required plan components (final environmental impact statement, chapter 1, Plan Components) to meet the substantive requirements of the Planning Rule related to sustainability (section 219.8), plant and animal diversity (section 219.9), multiple-use (section 219.10), and timber (section 219.11).

4163

The component SPEC-FW-GOAL-03 that describes future plan specificity at the species level is provided as a plan goal, where "goal" is a new plan component term whose broad intent will rely on some future public process or interaction after the plan revision process has been finalized. The public is left to question how these forests are to manage for the persistence of species of conservation concern plants throughout the term of these three plans. This ambiguity is a critical failing of the draft plans to provide clearer management guidance, and will result only in contentious, ineffective, and likely impossible implementation at the project level.

Response: Draft plan SPEC-FW-GOAL 03 stated; "Develop and implement a consistent, systematic, biologically sound program for plant species of conservation concern and their habitat so that federal listing does not occur." This plan component was changed to a potential management approach (see final plan; chapter 2; Ecological Sustainability and Diversity of Plant and Animal Communities; Animal and Plant Species; Potential Management Approach, bullet 1).

An additionally added potential management approach related to at-risk species states: "Incorporate the conservation of at-risk species into all program areas at appropriate times and scales, including but not limited to recreation, fire and fuels, vegetation management, minerals, range, engineering, and special uses" (final plan; chapter 2; Ecological Sustainability and Diversity of Plant and Animal Communities; Animal and Plant Species; Potential Management Approach, bullet 2).

While potential management approaches are not plan components, they are used to describe the principal activities and program priorities the responsible official intents to use to carry out

projects and activities developed under and in compliance with the plan. Potential management approaches can convey a sense of priority for which management to emphasize.

In order to provide clearer management guidance than is provided in potential management approaches, bullets 1 and 2 (cited above), SPEC-FW-STD 01 and SPEC-FW-GDL 04 were also added to the final plan.

SPEC-FW-STD 01 directs that "Design features, mitigation, and project timing considerations are incorporated into projects that may affect occupied habitat for at-risk species" and SPEC-FW-GDL 04 directs that "Habitat management objectives or goals from approved conservation strategies or agreements should be incorporated, if appropriate, in the design of projects that will occur within at-risk species habitat." Both of these plan components work together to help achieve or maintain desired conditions SPEC-FW-DC 01 through 04 (see final plan, chapter 2, Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species, Forestwide Components for Animal and Plant Species, Desired Conditions).

4164

There are no plan objectives specific to the management of at-risk plants. We recommend revising draft plans to change the plan goal (SPEC-FW-GOAL), to a plan objective (SPEC-FW-OBJ), as plan objectives are clearly defined plan components where plan goals are left largely to a future, currently undefined process.

Response: An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives are based on reasonable foreseeable budgets. A goal is a broad statement of intent, other than desired conditions, usually related to process or interaction with the public. Goals are expressed in broad, general terms, but do not include completion dates. Goals may be used to describe overall desired conditions of the plan area that are also dependent on conditions beyond the plan area or Forest Service authority. Goals may be used in lieu of objectives if the outcome is the result of a partnership between the Forest Service and other land owners within the broader landscape, or if the outcome is uncertain, because it could be beyond the fiscal capability of the national forest.

Due to budgetary uncertainties, the plan goals (SPEC-FW-GOAL 01; 03; and 04) related to at-risk plants, were not converted into plan objectives. In addition, SPEC-FW-GOAL 01; 03; and 04 most appropriately meet the definition of a goal because they describe overall desired conditions of the plan area that would occur as a result of a partnership between the Forest Service and other land managers within the broader landscape.

Including plan components SPEC-FW-GOAL 01; 03; and 04 as goals best allows management to adapt to local conditions and select management approaches based on new information and monitoring results as partnership opportunities and funding becomes available.

4165

Recommended wilderness, designated wilderness, suitable, eligible Wild and Scenic Rivers, research natural areas, national scenic trails, inventoried roadless Areas, and other designated areas with high social or ecological values, warrants special protection under President Obama's November 2015 Presidential Memorandum on

Mitigation and should be treated as irreplaceable resources, include plan components to ensure that project-level decisions avoid adverse impacts to them.

Response: Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to recommended wilderness (see final plan, chapter 3, Recommended Wilderness).

Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to designated wilderness areas (see final plan, chapter 3, Designated Areas; Wilderness).

Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to eligible Wild and Scenic Rivers (see final plan, chapter 3, Eligible Wild and Scenic Rivers).

Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to Research National Areas (see final plan, chapter 3, Designated Areas, Research Natural Areas).

Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to National Scenic Trails (for instance, Pacific Crest National Scenic Trail) and the corridor surrounding the Pacific Crest Trail (see final plan, chapter 3, Management Areas, Pacific Crest National Scenic Trail Corridor).

Plan components are included in the final plan to ensure that project-level decisions avoid adverse impacts to Inventoried Roadless Areas (see final plan, chapter 3, Designated Areas, Inventoried Roadless Areas).

Plan components to ensure that project-level decisions avoid adverse impacts to “other designated areas,” including the Mono Basin National Forest Scenic Area, Ancient Bristlecone Pine Forest, National Recreation Trails, Scenic Byways, and Wild Horse and Burro Territories are also included in the final plan (see final plan, chapter 3, Designated Areas).

4166

The desired conditions, standards and guidelines for the 30 different resource areas and 'topic areas' conflict in many situations.

Response: Modifications were made to the final plan to alleviate conflicting plan components. In addition, the final plan was also restructured so that plan components (for instance, desired conditions, objectives, goals, standards, guidelines and potential management approaches) are found together, grouped by resource, not in separate chapters like they were originally organized in the draft plan. During this reorganization, plan component consistency was strengthened, some components eliminated, and others added to the final plan. These organizational changes were designed to help the reader better understand where plan components apply, how they are internally consistent, and how they work together to achieve or maintain desired conditions in the plan area.

4168

Improve and revise the forest plans to better serve the public and wildlife, not timber interests.

Response: Congress entrusted the Secretary of Agriculture with broad powers to protect and administer the National Forest System by passing laws, such as the Organic Administration Act of

1897 (the Organic Act), the Multiple-Use Sustained-Yield Act of 1960 (MUSYA),and the National Forest Management Act of 1976 (National Forest Management Act).

National Forest Management Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use, sustained-yield principles, and implement a resource management plan for each unit of the National Forest System using an interdisciplinary approach. Through the Multiple-Use Sustained-Yield Act, Congress directed the Secretary to administer the National Forest System for multiple use (for example, outdoor recreation, range, timber, watershed, and wildlife and fish purposes) and sustained yield of renewable resources without impairment of the productivity of the land (16 U.S.C. 528–531), thus establishing multiple-use as the foundation for management of national forests and grasslands. The statute defines ‘‘multiple use’’ broadly, calling for management of the various uses in the combination that will best meet the needs of the American people (16 U.S.C. 531). Under this framework, courts have recognized that the Multiple-Use Sustained-Yield Act does not envision that every acre of National Forest System land be managed for every multiple use, and does envision some lands being used for less than all of the resources. As a consequence, the agency has wide discretion to weigh and decide the proper uses within any area. (Wyoming v. USDA, 661 F.3d, 1209, 1267–1268 (10th Cir. 2011); Perkins v. Bergland, 608 F.2d 803, 806– 807 (9th Cir. 1979); and City & Cnty. Of Denver v. Bergland, 695 F.2d 465, 476 (10th Cir. 1982)). In passing the Multiple-Use Sustained-Yield Act, which directs the Forest Service to administer the national forests for ‘‘sustained yield of the several products and services obtained therefrom.’’ The National Forest Management Act reaffirmed multiple use and sustained yield as the guiding principles for land management planning of National Forest System lands (16 U.S.C. 1600, 1604).

Many distinctive roles and contributions of the Inyo National Forest are recognized and described in chapter 1 of the final plan (final plan, chapter 1, Introduction, Distinctive Roles and Contributions of the Plan Area). This section highlights the importance of the providing and maintaining these beneficial multiple-uses of the national forest. The benefits provided from all of the national forest contributions described in this section provide tremendous, ecological, social, and economic value. The final plan has identified long-term or overall desired conditions and provide general direction for achieving those desired conditions organized by resource, under two broad major categories: (1) Ecological Sustainability and Diversity of Plant and Animal Communities; and (2) Social and Economic Sustainability and Multiple Uses. Within these categories, the final plan includes specific desired conditions pertaining to Air Quality, Watershed Condition, Terrestrial Ecosystems and Vegetation, Animal and Plant Species, Invasive Species, Fire, Sustainable Recreation, Scenery, Timber and Other Forest Products, Rangeland Livestock Grazing, Geology and Mineral, Energy, and Cultural Resources (final plan, chapter 2, Forestwide Desired Conditions and Management Direction).

Also provided in the final plan are objectives, goals, standards, and guidelines, which were designed to work together, in an integrated way to achieve or maintain desired conditions (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). All of these plan components work together as a whole to meet the requirements of the 2012 Planning Rule (36 CFR 219.8 through 219.11), National Forest Management Act, and Multiple-Use Sustained-Yield Act. Species specific Desired Conditions and other plan components are included in the final plan (final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species); however, these components, hold no greater or lesser importance than the other plan component

included in the final plan. These plan components were included to provide direction to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area while providing opportunities for recreation, range, timber, and other uses (final plan, chapter 2. Forestwide Desired Conditions and Management Direction). They do not specifically prevent any action, project, or activity from occurring on the national forest nor do they compel any action, project, or activity (final plan, chapter 1, Introduction, Purpose of the Forest Plan).

The record of decision includes a rationale for how the plan components meet the substantive requirements of the planning rule and how the plan components maintain or restore ecological conditions to provide for ecological sustainability and to contribute to social and economic sustainability (36 CFR 219.8 and 219.9) while providing for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish (36 CFR 219.10 and 219.11).

4169

Guideline TERR-CES-GDL-6 is undefined on many levels, and even if 10 percent high-severity is conserved, it could be of areas that contain no or few large trees, thus precluding high-value wildlife habitat from being protected.

Response: See responses to 7310, 7311 7312, 7313 and 7314.

4170

In the context of suitability determinations for timber, incompatibility of logging with maintenance and restoration of plant community diversity, including rare plant communities, was not considered.

Response: See response to comment 4171.

4171

The proposed plans evaluate suitability for just one use – timber. There were no withdrawals made to protect plant community diversity. Where timber harvest takes place additional withdrawals are needed.

Response: Although 36 CFR 219.7(e)(1)(v) *Suitability of Lands* states, “Specific lands within a plan area will be identified as suitable for various multiple uses or activities based on the desired conditions applicable to those lands. The plan will also identify lands within the plan area as not suitable for uses that are not compatible with desired conditions for those lands” it goes on to also state: “The suitability of lands need not be identified for every use or activity.” Identifying lands that are *not* suitable for timber production are the only lands that *must* by identified in the forest plan: *Every plan must identify those lands that are not suitable for timber production (36 CFR section 219.11).*

In appendix E: Timber Suitability and Management (final plan), in the section Lands that May be Suitable for Timber Production, the criteria used to determine the lands that may be suitable for timber production are shown. Once lands are identified that may be suitable for timber production, lands that are suited for timber production are determined based on compatibility with desired conditions and objectives.

After subtracting the lands that are suited for timber production from the lands that may be suitable, the remaining lands are not suited for timber production because timber production is

not compatible with the land area's desired conditions and objectives. Categories of lands deemed not suited for timber production include areas recommended for wilderness designation, wild river segments of eligible wild and scenic rivers[1], and riparian conservation areas (RCAs).

Plan components, including desired conditions, goals, standards, guidelines, and potential management approaches, are included in the final plan to guide timber harvest for timber production or other multiple use purposes on lands identified as suitable for timber production as directed by 36 CFR 219.11(b). Plan components included to protect plant community diversity can be found in chapter 2 of the final plan (final plan, chapter 2, Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species, Forestwide Components for Animal and Plant Species). These components provide the direction to manage for plant community diversity that will be implemented at the project level and considered and incorporated into project-level planning.

4172

TERR-FW-DC 03, above, is identical to MA-RCA-DC 15, below, and is also a direct quote from the 2012 planning rule about National Forest Management Act 's diversity requirement (219.9(b)), it is not an actual plan component, it's just a definition. Desired conditions must be described in terms specific enough to allow progress toward their achievement, this desired condition does not meet this requirement because it lacks any specificity.

Response: MA-RCA-DC 15 was a duplicate of TERR-FW-DC 03 and has been removed from the final plan. TERR-FW-DC 03 has been retained in the final plan (now TERR-FW-DC 05).

36 CFR 219.9(b)(1) states "The responsible official shall determine whether or not the plan components required by paragraph (a) of this section provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area." MA-RCA-DC 15 (now TERR-FW-DC 05) was included in the draft plan as a desired condition stating, "Ecological conditions contribute to the recovery of threatened and endangered species, conserve proposed and candidate species, and support the persistence of species of conservation concern." A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates. MA-RCA-DC 15 (now TERR-FW-DC- 05) describes a condition with enough specificity that would allow progress towards its achievement (for example, maintenance or improvement) to be measured through monitoring. For example, simple presence absence surveys could answer whether threatened or endangered species have returned to areas within the plan area, whether proposed or candidate species continue to persist in the plan area, or whether species of conservation concern continue to persist in the plan area. Therefore, TERR-FW-DC 05 meets the definition of a desired condition.

While 36 CFR 219(b)(1) is not an actual plan component, and rather describes the responsibility of the responsible official, the Inyo final plan has incorporated the language provided as a specific plan component (now TERR-FW-DC 05). Doing so, is neither prohibited nor required by the 2012 Planning Rule. Standards TERR-FW-STD 01 and Guidelines TERR-FW-GDL 01 and 02,

[1] Area includes a corridor incorporating approximately 0.25 miles on either side of eligible Wild and Scenic Rivers.

were included to provide the ecological conditions necessary to contribute to the recovery of threatened and endangered species, conserve proposed and candidate species, and support the persistence of species of conservation concern (final plan, chapter 2, Forestwide Desired Conditions and management Direction, Ecological Sustainability and Diversity of Plant and Animal Communities, Terrestrial Ecosystems and Vegetation),

4173

The list of proposed and possible actions can be modified at an administrative level. The forests should conduct outreach with local communities prior to any changes, and as needed, when these actions affect local communities as applied to specific projects.

Response: The plan emphasizes partnerships and interagency and public communication and engagement. The list of proposed and possible actions was developed as our estimate of what actions might occur during the planning period (which is 10 to 15 years). Project-level actions typically require additional public involvement and environmental analysis unless they have been demonstrated to not significantly affect the environment. We also have a schedule of proposed actions that community members can view on the website to identify if projects of interest are proposed.

4174

The draft plan should expressly state that Land Exchanges and Townsite Act acquisitions should be considered where (a) national forest land proposed for exchange or acquisition is directly connected to urban areas, (b) disposal of national forest land via land exchanges or Townsite Act is necessary to support the reasonable economic and social needs of the connected urban areas, and/or (c) exchange or acquisition is justified under applicable authorities, such as the Exchange Act or the Townsite Act.

Response: The final plan contains plan components that address land exchanges, including: LAND-FW-DC-01 and a potential management approach. Management direction for Lands was not identified as a need to change area (USDA, Inyo, Sequoia, and Sierra National Forests Need to Change Analysis-Supplement, June 2014). Therefore, the management direction from the 1988 Land and Resource Management Plan was brought forward into the final plan. The plan does not prohibit any land exchanges for Townsite Act acquisitions or Exchange Act authorities.

4175

The plans need to include guidelines for drone activity on public lands.

Response: The final plan has been designed to be a focused document adding to, but not reiterating existing law, regulation and policy. The Federal Aviation Administration (FAA) has regulatory authority over all airspace, including recreational use of airspace by model aircraft (See FAA Advisory Circular 91-57). The U.S. Forest Service does not have the authority to establish any additional regulations regarding where unmanned aircraft systems or drones can or can’t be flown. Individuals and organizations that fly unmanned aircraft systems (for example, drones) on National Forest System lands must follow FAA guidance. FAA guidance stipulates that unmanned aircraft systems not interfere with manned aircraft, be flown within sight of the operator and be operated only for hobby or recreational purposes. The FAA also requires model aircraft operators flying unmanned aircraft systems within five miles of an airport to notify the airport operator and air traffic control tower. The FAA’s model aircraft provision apply only to

hobby or recreation operations and do not authorize the use of model aircraft for commercial operations.

See also FSM 5713.7 and FSH 5709.16. All references to manned aircraft include unmanned aircraft systems.

4176

Need to provide a context for the application of plan components.

Response: The final plan provides additional introductory narratives for each resource section in chapters 2 and 3 to provide better context describing where the associated plan components apply, their intent, and in some cases how they relate to other resource areas. The final plan was also restructured so that plan components (for instance, desired conditions, objectives, goals, standards, guidelines and potential management approaches) are found together, grouped by resource, not in separate chapters like they were originally organized in the draft plan. These organizational changes were designed to help the reader better understand where plan components apply, how they are internally consistent, and how they work together to achieve or maintain desired conditions in the plan area.

4177

The draft environmental impact statement and plans need to address lightening of regulatory restrictions. Add a section to the Plan that addresses activities on the forest that require a permit and create a vision and goals for permit streamlining then develop and include management strategies in the plan to meet these goals.

Response: The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on “how” the desired conditions outlined in the plan are met. Many regulatory restrictions (for example, permit required activities) emanate from law, regulation or policy as well as the forest plan. The plan cannot countermand law, regulation or policy and therefore a goal of lightening this type of regulation is not possible via this planning effort but may be pursued through other methods. Much of the challenges in permit issuance not related to regulations stems from limitation on resources to complete required work that the forest plan cannot resolve.

4178

Plan direction does not adequately address benefits to people and communities.

Response: The effects of plan direction on benefits to people and communities is examined in the “Benefits to People and Communities-Economic Conditions” section of chapter 3 of the final environmental impact statement. This includes an examination of the vegetation, recreation, range, wildlife and other key plan direction on the sustainability of key benefits to people such as: recreational opportunities; water use on forest and downstream; biodiversity for activities such as fishing, hunting, wildlife viewing and plant gathering; grazing; air quality and energy generation.

4179

The forest plans should be better coordinated with the processes going on concurrently with the adjacent National Parks.

Response: Input from the National Parks has been sought on this planning effort and conflicts in plan requirements have been minimized. The Forest Service and the National Park Service commonly meet on cross-boundary management issues related to recreation, fire management, wilderness management and other issues of mutual concern.

4180

The final plans need to include winter recreation opportunity spectrum settings and additional management categories such as special recreation management areas, and the public should have the opportunity to comment on these additional elements prior to the final environmental impact statement. Without an opportunity to comment on the completed draft environmental impact statement and associated plans, the only recourse for the public will be to file an objection.

Response: The final plan includes a winter recreation opportunity spectrum map (appendix A, Maps), added in response to public comments. This map was released to the public for information sharing purposes on September 27, 2016 (https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=FSEPRD545106). Recreation management areas were also developed based on public comment and where also included in an information sharing posting in June, 2016 (https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=FSEPRD545106). While this did not provide a formal comment period, it does provide time to the public to review the new map. The commenter is correct in stating that the public does have another opportunity to voice disagreement with plan components and supporting documents during the objection period. The plan includes plan components for the different recreation management areas of destination recreation management area, general recreation area, and challenging backroad recreation area.

4182

Strengthen the draft Inyo forest plan to provide stronger, science based protections for the Inyo's critical wildland ecosystems to safeguard our valuable water resources, wilderness, fish and wildlife habitats and sustainable recreation.

Response: New plan components were added and others modified in the final plan to strengthen the final plan to provide stronger, science based protections (safeguards) for water resources, wilderness, fish and wildlife habitats, and sustainable recreation. These new or modified plan components include:

Water Resources:

WTR-FW-DC -05; 06; and 07
WTR-FW-STD-02; and 04

MA-CW-DC-01; 02; 03
MA-CW-OBJ-01
MA-CW-STD-01
MA-CW-GDL-01; 02; and 03

MA-RCA-DC-02; 06; 07; 11
MA-RCA-OBJ-01
MA-RCA-GOAL 01 and 02
MA-RCA-STD-12; 13; 14;17; 18; and 19
MA-RCA-GDL-02; 04; and 06

RCA-RIV-DC-03; 04; 05; and 06
RCA-RIV-OBJ-01; and 02

MA-EWSR-DC-01
MA-EWSR-STD-01

DA-WSR-STD-06 and 07

Wilderness:

DA-WILD-GOAL-01

Fish and Wildlife Habitats:

SPEC-FW-DC-03
SPEC-FW-GOAL-02; 03;04;05 and 06
SPEC-FW-STD-01
SPEC-FW-GDL-03; and 04
SPEC-SG-GOAL-02; 03; and 04
SPEC-SG-STD-08; 14; and 15
SPEC-SHP-DC-01 and 02
SPEC-SHP-GOAL-01
SPEC-SHP-STD-01 and 02
SPEC-SM-GDL-02
SPEC-CSO-DC-01; 02; 03; 04; and 05
SPEC-CSO-STD-01; 02; 03; 04; and 05
SPEC-CSO-GDL-01; 02; 03; 04; 05; 06; 07; 08; 09; 10; and 11
SPEC-LCT-STD-01
SPEC-PCTR-STD-01
SPEC-GT-GOAL-01
SPEC-GT-STD-01
SPEC-AMPH-STD-01

Sustainable Recreation:

REC-FW-DC-04; 11; 12; and 13
REC-FW-OBJ-02; 03; and 04
REC-FW-GOAL 01; 02; 03; 04; 05; 06; 07; 08; 09; 10; 11; and 12
REC-FW-STD-01
REC-FW-GDL-01; 02; and 03
MA-DRA-DC-01; 02; 03; 04; 05; 06; 07; 08; and 09
MA-GRA-DC-01; 02; 03; 04; 05; 06; 07; 08
MA-GRA-OBJ-01
MA-GRA-GOAL-01
MA-GRA-GDL-01

MA-CBRA-DC-01; 02; 03; 04; 05; 06; 07; and 08
MA-CBRA-STD-01; 02; 03; and 04

4183

We need a more science-based plan that allows for adaptive management as needed.

Response: The Inyo forest plan is based on the best available scientific information as required in the 2012 Planning Rule (36 CFR 219.3). In chapter 4, the Plan Monitoring Program, we address the monitoring and evaluation components of adaptive management. In particular, as required in the 2012 Planning Rule (36 CFR 219.12(d)(2)), a biennial evaluation report will be prepared and "used to inform adaptive management of the plan area." Any changes to plan components or management activities will be made by the responsible official based on this and other relevant information as needed in the future.

Planning Rule

4184

The Forest Service needs to adequately engage local authorities, especially County Board of Supervisors, as stated in the 2012 Planning Rule. Merely providing them with the opportunity to comment does not satisfy the requirements of this regulation. The draft environmental impact statement should be revised to include the analysis of local plans and policies as required by the Planning Rule and directives. The draft forest plans should be revised to reflect appropriate ongoing coordination with local governments.

Response: We entered into an agreement with the Inyo County Board of Supervisors to act as a cooperating agency in the plan revision process (Inyo National Forest Cooperating Agency Memorandum of Understanding with Inyo County June, 2014). This process included working directly with county staff to collect and incorporate information to describe current conditions and trends as well as determine potential effects, specifically on economics, but did include other uses of the national forest as well. We also reviewed all the county general plans for the counties the Inyo National Forest occurs in; this includes Inyo, Madera, Mono, and Tulare Counties in California as well as Esmeralda and Mineral Counties in Nevada. The documentation of the consideration of planning direction found within these county plans and how those were addressed or included in the final plan are found in the final environmental impact statement, volume 2, appendix E: Consistency with other Planning Efforts. The final plan also includes language that addresses comments raised by the counties in increasing coordination between the Forest Service and local governments. This can be found in the following local communities plan components: LOC-FW-DC 01, 03, and 07 and LOC-FW-GOAL 01, 03, and 04 (final plan, chapter 2).

4185

Section 219.8, sustainability, of the Planning Rule speaks to "ecological integrity" and states that plans "must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area..." 219.8 also specifically references" system drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire..." The intent of 219.8 has not yet been met because,

for example, the ecological integrity of post-fire ecosystems is not being ensured by the plans due to a lack of standards and guidelines addressing such ecosystems.

Response: The record of decision articulates the connection between the plan components in the Inyo plan and the substantive requirements of the planning rule, including 219.8 and ecological sustainability. The ecological integrity and sustainability of post-fire ecosystems is addressed several sections of the Inyo Forest Plan (final plan, chapter 2, Terrestrial Ecosystems) including "Forestwide" (TERR-FW-DC-02, 07, 08), "Complex Early Seral Habitats" (TERR-CES-DC-01 to 03, TERR-CES-GOAL-01, TERR-CES-GDL-01 to 05), "Sagebrush" (TERR-SAGE-DC-01 and 04; TERR-SAGE-GOAL-01), "Pinyon-Juniper" (TERR-PINY-DC-01 and 02; TERR-PINY-GOAL-01), and "Xeric Shrub and Blackbrush" (TERR-XER-DC-01 and 02).

4186

Section 219.9 goals and mandates are not being met by the draft plans, and instead the plans dramatically fail to achieve wildlife and plant conservation, especially for species that rely on large home ranges and species that rely on habitat that the U.S. Forest Service believes is prone to high-severity fire (for example, California spotted owl, fisher, black-backed woodpecker, and Sierra marten). Section 219.9 mandates that plans contain *"components, including standards or guidelines, to maintain or restore the diversity of ecosystems and habitat types throughout the plan area, including plan components to maintain or restore: (i) Key characteristics associated with terrestrial and aquatic ecosystem types; (ii) Rare aquatic and terrestrial plant and animal communities; and (iii) the diversity of native tree species similar to that existing in the plan area."* Additionally, in order to protect forest wildlife and plants, section 219.9 requires the U.S. Forest Service to *"determine whether or not the plan components provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area."* If the plan components do not unequivocally achieve that mandate, then section 219.9 requires *"additional, species-specific plan components, including standards or guidelines, to provide such ecological conditions in the plan area."*

Response: The National Forest Management Act requires that plans provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives (16 USC 1604 (g)(3)(B)). 36 CFR 219.9 is included to fulfill this "diversity" requirement of National Forest Management Act (16 USC 1604 (g)(3)(B)). 36 CFR 219.9 requires that the agency provide plan components to maintain or restore the diversity of ecosystems and habitat types within the plan area to contribute to maintaining viable populations of species across their range while providing for social, economic, and ecological sustainability (36 CFR 219). The Multiple-Use Sustained-Yield Act (15 Public Law 86-517) states "it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Many distinctive roles and contributions of the Inyo National Forest are recognized and described in chapter 1 of the final plan (final plan, chapter 1, Introduction, Distinctive Roles and Contributions of the Plan Area). This section highlights the importance of the providing and maintaining these beneficial multiple-uses of the national forest. The benefits provided from all of the Inyo National Forest contributions described in this section provide tremendous, ecological, social, and economic value.

The final plan has identified long-term or overall desired conditions and provide general direction for achieving those desired conditions organized by resource, under two broad major categories:

(1) ecological sustainability and diversity of plant and animal communities; and (2) social and economic sustainability and multiple uses. Within these categories, the final plan includes specific desired conditions pertaining to air quality, watershed condition, terrestrial ecosystems and vegetation, animal and plant species, invasive species, fire, sustainable recreation, scenery, timber and other forest products, rangeland livestock grazing, geology and mineral, energy, and cultural resources (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). Also provided in the final plan are objectives, goals, standards, and guidelines, which were designed to work together, in an integrated way to achieve or maintain desired conditions (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). All of these plan components work together as a whole to meet the requirements of the 2012 Planning Rule (36 CFT 219.8 through 219.11), National Forest Management Act, and MUSYA. Species specific Desired Conditions and other plan components are included in the final plan (final plan, chapter 2, Forestwide Desired Conditions and Management Direction, Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species); however, these components, hold no greater or lesser importance than the other plan component included in the final plan. These plan components were included to provide direction to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area while providing opportunities for recreation, range, timber, and other uses (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). They do not specifically prevent any action, project, or activity from occurring on the Inyo nor do they compel any action, project, or activity (final plan, chapter 1, Introduction, Purpose of the Forest Plan).

The final environmental impact statement and forest plan for the Inyo National Forest does not address the California spotted owl, fisher, or black-backed woodpecker as these species are generally not found on this forest.

The Sierra marten, however, is found on the Inyo National Forest. Desired conditions for the Sierra marten are found in the forest plan in chapter 2 (SPEC-SM-DC 01 through 03), which describe a reduced risk of high-severity wildfire, a trend in terrestrial and riparian vegetation toward desired conditions, and well-distributed marten habitat across its range (which provides foraging, denning and resting habitat and movement across large landscapes). Guideline SPEC-SM-GDL 01 has been retained in the final plan and promotes marten core habitat retention and SPEC-SM-GDL 02 was added to both protect existing martin habitat and promote action to increase preferred Sierra marten denning habitat characteristics; “maintain or increase understory heterogeneity in marten denning habitat to promote hiding cover such as shrub patches, coarse woody debris, and slash piles following vegetation treatments. Design projects to have non-linear edges that unnaturally increase susceptibility to predation” (SPEC-SM-GDL 02).

The record of decision includes a rationale for how the plan components meet the substantive requirements of the planning rule including CFR 219.9 and how the plan components required by 36 CFR 219.9 paragraph (a) provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area.”

4187

Desired conditions, objectives, standards/guidelines in the draft plans do not provide any integration between resource uses; rather they are only designed in a functional manner, listed resource by resource. The desired conditions should set forth the

desired landscape of the future and the other plan components give guidance on how to get there.

Regrettably, the sustainable recreation desired condition statements in the draft plans are all programmatic in nature; they are not spatial (desired landscape).

Response: Considerable changes were made between draft and final plan for the recreation plan components. In particular, focus was given to provide for a more spatial approach to managing recreation use across the landscape. The interdisciplinary team and responsible official agreed that the concept of "places" included in the draft plan did not go far enough to provide adequate sustainable recreation direction. With that realization in conjunction with Forest Service Handbook (FSH) direction; "The interdisciplinary team is encouraged to use new approaches for managing recreation within the plan area. The interdisciplinary team should be proactive in developing a coherent system of sustainable and socially compatible recreation opportunities" (FSH 1909.12 23.23a 1d(2)). A "three zone approach" was developed for management of recreation in the final plan (final plan, chapter 3, Management Areas, Sustainable Recreation Management Areas). This three-zoned management approach spans a continuum of areas from more concentrated recreation to remote, less-concentrated, low-density recreation. This approach is intended to allow our staff to manage recreation differently from one place to another and to focus management where it is most needed, typically the destination recreation areas.

The difference between general recreation and challenging, backroad is the intensity of use, and while you may find similar recreation opportunity spectrum proportions within the two zones, the management of uses would be very different and the desired conditions of these areas are distinct. The difference, density of roads, level of use, accessibility are the distinguishing factors.

The management of recreation in these sustainable recreation management areas follows and flows from the desired conditions listed for each recreation zone (for instance, destination, general, and challenging, backroad recreation areas). The recreation opportunity spectrum class provides a foundation (settings). Recreation zones provide the overarching desired conditions for settings and decisions on facilities, infrastructure design and development.

In addition, the forest plan interdisciplinary team conducted an internal review of plan components within sustainable recreation management areas to determine if conflicts in management existed, thereby achieving an integrated approach to the management scheme in the final plan.

4188

Region 5 has not adhered to the intent of the new forest planning rule and guidelines for the process by working in close cooperation with the public, to provide meaningful engagement and considering public input. Forest Service staff indicated that American Whitewater's previous comments will be carefully considered and integrated into the Final environmental impact statement. However, there is concern that this will not be the case due to the inability to consider and incorporate American Whitewater's comments to date.

For multiple reasons, this is not an outcome that we want, and is part of why we are recommending that the Forest Service complete a supplemental draft environmental impact statement.

Response: See comments 8013, 8173, 8169, 8177, 8178, and 8202.

And as an example, American Whitewater's comments regarding Wild and Scenic Rivers were considered and incorporated into the final environmental impact statement, appendix C: Wild and Scenic Rivers Evaluation for the Inyo National Forest. These comments provided information on whitewater rafting recreational outstandingly remarkable values, which were added to the recreation outstandingly remarkable value description for Hot Creek. A supplemental draft environmental impact statement is not needed because these comments have been considered and incorporated into appendix C in the final environmental impact statement.

4189

The approach taken to revising these forest plans does not provide for an orderly transition from Regional Forester sensitive species to species of conservation concern. The planning rule relies on the forest plan's plan components to provide for viability, and relies on an as yet undefined process to determine project level consistency. The planning rule also does not require monitoring of species of conservation concern, further weakening the connection between plan direction and implementation.

Response: The 2012 Planning Rule does requires that each plan monitoring program must contain one or more monitoring questions and associated indicators to address "The status of a set of the ecological conditions required under 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern (36 CFR 219.12(a)(5)(iv)). Three specific monitoring questions (AR01 through AR03) and associated indicators have been included in the final plan to monitor the ecological conditions (including habitat) for select at-risk species to meet this requirement (see final plan, chapter 4, Inyo National Forest Plan Monitoring Program, "Ecological Conditions for At-Risk Species" section). At-risk species include federally recognized threatened, endangered, proposed, and candidate species and species of conservation concern within a plan area. The plan monitoring plan also includes two monitoring questions and associated indicators for focal species, which could include species of conservation concern (see final plan, chapter 4, Inyo National Forest Plan Monitoring Program, "Focal Species" section).

Furthermore, plan components have been included in the final plan to provide for viability of species of conservation concern include; TERR-FW-DC 05; SPEC-FW-DC 02; SPEC-FW-GDL 01; and potential management approach for animal and plant species, bullet 1 (final plan, chapter 2, Ecological Sustainability and Diversity of Plant and Animal Communities, Subsections – Terrestrial Ecosystems and Vegetation and Animal and Plant Species). In addition, conservation watersheds have been identified that provide for connectivity of species of conservation concern and management emphasis for these management areas are to maintain or improve, where possible, the functional rating of these systems for the long term and to provide for persistence of SCC by maintaining connectivity and refugia for these species (see plan components at final plan, chapter 3, Conservation Watersheds).

And finally, the 2012 Planning Rule specifically states, "A plan does not authorize projects or activities or commit the Forest Service to take action. A plan may constrain the agency from authorizing or carrying out projects or activities, or in the manner in which they occur. Projects and activities must be consistent with the plan" (section 219.15) (36 CFR 219.2(b)(2)). Therefore, any project planned and implemented must be consistent with the plan (36 CRF 219.15) by meeting all of the plan's goals, desired conditions, objectives, standards, guidelines, and land suitability requirements thereby directly connecting the plan direction to implementation.

4190

There is nothing in the Planning Rule that provides authority to "establish a flexible forest plan" (draft environmental impact statement, p. 6) by building uncertainty into the plan components themselves. This attempt to provide maximum discretion to future decision-makers on a project-by-project basis would be counter to the purpose of National Forest Management Act to provide integrated and strategic direction for future projects, and it would bypass the requirements of the planning rule which explicitly do not apply to projects (36 C.F.R. 2192(c)). In the case of at-risk species, it would allow the Forest Service to avoid its statutory obligation for forest plans to provide for diversity of plant and animal communities.

Response: 36 CFR 219.5(a) of the Planning Rule states, "The intent of [the three phases of the planning framework] is to create a responsive planning process that informs integrated resource management and allows the Forest Service to adapt to changing conditions, including climate change, and improve management based on new information and monitoring." This is where the authority to introduce flexibility has been provided. As such the plan was developed in such a way as to identify long-term or overall desired conditions and provide general direction for achieving those desired conditions, rather than specifying particular methods that must be used to achieve or move toward those desired conditions. Hence, the plan is flexible to allow management to adapt to local conditions and select management approaches based on new information and monitoring results.

The National Forest Management Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use, sustained-yield principles, and implement a resource management plan for each unit of the National Forest System using an interdisciplinary approach. The 2012 Planning Rule specifically states, "A plan does not authorize projects or activities or commit the Forest Service to take action. A plan may constrain the agency from authorizing or carrying out projects or activities, or in the manner in which they occur. Projects and activities must be consistent with the plan" (section 219.15) (36 CFR 219.2(b)(2)). Therefore, although, none of the requirements of subpart A of the 2012 Planning Rule (except as provided in the plan consistency requirements in section 219.15) apply to projects or activities (36 CFR 2019.2(c)) any subsequent projects conducted must be consistent with the plan (36 CRF 219.15) by meeting all of the plans goals, desired conditions, objectives, standards, guidelines, and land suitability requirements.

The National Forest Management Act (National Forest Management Act) requires that plans provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives (16 USC 1604 (g)(3)(B)). The 2012 Planning Rule requires that the agency provide plan components to maintain or restore ecological conditions within the plan area to contribute to maintaining viable populations of species across their range while providing for social, economic, and ecological sustainability (36 CFR 219).

Desired Conditions and other plan components are included in the final plan that provide direction to maintain the diversity of plant and animal communities (including at-risk species) and support the persistence of native species within the plan area (final plan, chapter 2. Forestwide Desired Conditions and Management Direction Ecological Sustainability and Diversity of Plant and Animal Communities, Animal and Plant Species). These components provide the direction to provide for ecosystem integrity and diversity and to meet the ecological conditions necessary in order to provide for diversity of plant and animal communities.

4191

Each national forest proposes to manage grazing similar to the current practices (although this approach differs by National Forest) (Sequoia and Sierra National Forests: RANG-FW-STD-01 to 03; SPEC-GGO-GDL-01; Inyo National Forest: MA- RWLD-STD-02; DA-RNA-SUIT-08; SPEC-SHP-STD-01; RANG-FW-STD-01 to 02). This includes grazing management in meadows (MA-RCA-STD-11 to 17; MA-RCA-GDL-06 to 08). We do not object to the thresholds themselves (i.e. percent allowable forage use or percent allowable streambank alteration) as we recognize many of these have been established for a long time and are effective in maintaining healthy rangelands. However, the use of thresholds as regulatory standards applied across all grazing allotments (regardless of site specific information) and the punitive consequences tied to these standards if not met, is inconsistent with the planning rule as well as the stated intent in these forest plans.

Response: Grazing utilization standards for the Inyo National Forest have been brought forward from the existing plan and simplified. Monitoring and evaluation guidance was removed from the final plan and incorporated as supplemental guidance in the R5 Rangeland Analysis and Planning Guide. Establishment of utilization standards for a specific location requires an evaluation of key forage species and hydrologic function (RANG-FW-STD 01 and 02). These utilization levels vary by rangeland type, grazing strategy and current site-specific ecological conditions. Nine additional guidelines have been added to provide guidance and use of indicator thresholds (RANG-FW-GDL 01-09), which are more descriptive and less prescriptive.

The Inyo forest plan itself does not prescribe any punitive consequences for not meeting rangeland standards, rather administrative actions resulting from non-compliance is found in Forest Service-wide policy (FSH 2209.13, section 16.4).

Outside the Scope

4192

Increased visitor use on the Pacific Crest Trail and John Muir Trail overlap needs management plan and quotas and usage of this trail continues to grow. Set John Muir Trail specific desired conditions, standards and guidelines.

Response: We manage 86 miles of the Pacific Crest Trail (96 percent are in wilderness) and all 86 miles are part of the John Muir Trail (JMT). Therefore the management direction and plan components included in the final plan associated with the Pacific Crest National Scenic Trail Corridor Management Area (final plan, volume 1, chapter 3, Management Areas) would also apply to the John Muir Trail. Desired Conditions, Standards, Guidelines, Suitability, and Potential Management Approaches listed in this section for the Pacific Crest Trail, directly apply to all 86 miles of the John Muir Trail shared by the Pacific Crest Trail on the Inyo National Forest. These Plan Components provides a description of the social, economic and/or ecological characteristics toward which management of the Pacific Crest National Scenic Trail Corridor (and therefore, the John Muir Trail) should be directed, and the constraints on project and activity decision-making that establish or help to achieve or maintain the desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements associated with the Pacific Crest National Scenic Trail Corridor. Forest plans do not define the number of permits administered or management quotas. If it is found that the desired conditions defined in the final plan are not being met, permit quotas may be modified to ensure the desired conditions are maintained. See response to comment 8223.

4194

A different system to pay for firefighting should be a goal in the Inyo Forest Plan.

Response: Congress is responsible for appropriating funds to federal agencies, including the Forest Service. The Forest Service fire budget is a part of these appropriated funds. The forest plan cannot invoke changes to the Forest Service budget or how allocated funds are spent.

4195

All three forests should be protected as natural preserves, which would expand the national park acreage about five times its current size.

Response: All National Forest System lands are collectively owned by the American people through the Federal government, and managed by the U.S. Forest Service, a division of the USDA. The National Forest System was created by the Land Revision Act of 1891. The National Forest Management Act (National Forest Management Act) of 1976 is a U.S. Federal law that is the primary statue governing the administration of national forests. The main objectives of National Forest Management Act are to require the U.S. Forest Service to develop plans for national forests, set standards for timber sales, and create policies to regulate timber harvesting. The purpose of these objectives is to protect national forests from permanent damages from excessive logging and clear cutting. Congress requires the Forest Service, in conjunction with other applicable agencies, to thoroughly assess, research, and plan for the nation's renewable resource use, the current demand, anticipated demands, and environmental and economic impacts. The Inyo National Forest personnel manage the land as directed by the Land Revision Act of 1891 and the National Forest Management Act of 1976. Any changes to governing body of National Forest System lands would require new or amended legislation be passed by Congress.

4196

Develop an alternative that mimics national park management.

Response: Perhaps the greatest difference between the two is the multiple use mandate for national forests. While national parks are highly vested in preservation, barely altering the existing state, national forests are managed for many purposes—timber, recreation, grazing, wildlife, fish and more. The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for enjoyment, education, and inspiration of this and future generations. The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. National parks are managed by the National Park Service. The National Park Service was created in 1916, by an act of Congress through the National Park Service Organic Act. The National Park Service is an agency of the U.S. Department of Interior. The National Park Service is charged with a dual role of preserving the ecological and historical integrity of the places entrusted to its management, while also making them available and accessible for public use and enjoyment. The National Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. National Forest System lands are managed by the U.S. Forest Service under the direction of the National Forest Management Act of 1976 (National Forest Management Act). The National Forest System was created by the Land Revision Act of 1891. The National Forest Management Act (National Forest Management Act) of 1976 is a U.S. Federal law that is the primary statue governing the administration of national forests. The main objectives of National Forest Management Act are to require the U.S. Forest Service to develop plans for national forests, set standards for timber sales, and create policies to regulate timber harvesting. The purpose of these objectives is to protect national

forests from permanent damages from excessive logging and clear cutting. Congress requires the Forest Service, in conjunction with other applicable agencies, to thoroughly assess, research, and plan for the nation's renewable resource use, the current demand, anticipated demands, and environmental and economic impacts. The Inyo National Forest personnel manage the land as directed by the Land Revision Act of 1891 and the National Forest Management Act of 1976. Any changes to governing body of National Forest System lands would require new or amended legislation be passed by Congress. The final plan implements the requirements of the 2012 Planning Rule (36 CFT 219.8 through 219.11) and National Forest Management Act. Developing an alternative that mimics national park management would not meet the requirements of the 2012 Planning Rule or National Forest Management Act and subsequently the intended purpose of National Forest System lands.

4198

Inherently governmental decision making authority should not be delegated to the Pacific Crest Trail Association. As written, the proposed "power" the Pacific Crest Trail Association receives is not legal, and they have an inability to work with mountain bikers, who could be a huge asset to the Pacific Crest Trail and have collectively contributed many hours to trail stewardship.

Response: Forest plans to do not delegate authority or "power." They do not specifically prevent any action, project, or activity from occurring on the Inyo nor do they compel any action, project, or activity to occur (final plan, chapter 1, Introduction, Purpose of the Forest Plan). Forest plans do not specify "how" the desired conditions outlined in the plan will be met. The Pacific Crest Trail Association is only referenced in the final plan as a potential partnership that may be used to reconstruct or relocate existing portions of the Pacific Crest National Scenic Trail as needed to enhance the recreation experience and protect resources (final plan, volume 1, chapter 3, Management Areas, Pacific Crest National Scenic Trail Corridor, Pacific Crest National Scenic Trail in Designated Wilderness and Outside of Designated Wilderness, Potential Management Approaches, bullet 1).

4199

The Pacific Crest Trail should be moved to avoid conflict with other recreation uses – motorized.

Response: The purpose of forest plans are to guide how National Forest System lands are managed. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specifically prevent any action, project, or activity from occurring on the Inyo, nor do they compel any action, project, or activity to occur (final plan, chapter 1, Introduction, Purpose of the Forest Plan). The Pacific Crest Trail was designated in 1968 by Congress as one of the original national scenic trails. The National Scenic Trails System Act (P.L. 90-543; 82 Stat. 919) directed that long distance trails (such as the Pacific Crest Trail) provide for the maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. Forest plans cannot modify or violate existing laws. Proposals to relocate segments of the Pacific Crest Trail must be evaluated using the optimal location review (OLR); a systematic and objective framework for determining the best location for the Pacific Crest Trail to better ensure protection of the trail and trail corridor for an outstanding recreation and scenic wilderness experience (see Pacific Crest National Scenic Trail Optimal Location Review Process

Guidelines March 2011). The optimal location review process is critical to ensure that the trail is located in the setting that best meets the congressional intent for location, outstanding recreation opportunities, and scenic resources. Actual relocation of the Pacific Crest Trail will require an environmental analysis and decision, conducted independently of the forest plan revision process, and significant relocation proposals will require U.S. Forest Service Chief or Congressional approval.

See response to to comment 8285.

4200

The Pacific Crest Trail management direction should be removed since it is already contained in other management documents, the forest plans are intended to be programmatic, or should be developed in a separate planning process specifically for the entire trail.

Response: See response to comment 4201 below.

4201

The Pacific Crest Trail management area/corridor is not needed because it does not increase or decrease Pacific Crest Trail visitor usage.

Response: The Pacific Crest Trail was designated in 1968 by Congress as one of the original national scenic trails. The National Scenic Trails System Act (P.L. 90-543; 82 Stat. 919) directed that long distance trails (such as the Pacific Crest Trail) provide for the maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. Management areas consist of land areas within the planning area that have the same set of applicable plan components. The purpose of this management areas is not to increase or decrease Pacific Crest Trail visitor usage. The management area for the Pacific Crest National Scenic Trail Corridor included in the final plan (final plan, volume 1, chapter 3, Management Areas) includes the lands in the visible foreground encompassing resources, qualities, values, associated settings, and primary uses. Management direction is provided for this management area through the plan components associated with this management area (final plan, volume 1, chapter 3, Management Areas, Pacific Crest National Scenic Trail Corridor), including desired conditions, standards, guidelines, suitability, and potential management approaches. This group of plan components provides a description of the social, economic and/ or ecological characteristics toward which management of the Pacific Crest National Scenic Trail Corridor should be directed, and the constraints on project and activity decision-making that establish or help to achieve or maintain the desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements associated with the Pacific Crest National Scenic Trail Corridor.

4202

The PCT (trail itself) should be open for bicycle (mechanized travel).

Response: The Wilderness Act was enacted through Congressional action and prohibits using mechanical devices (for example, bicycles) within the wilderness. Therefore, bicycle travel along portions of the Pacific Crest Trail located within the wilderness would require a wilderness act amendment or wilderness designation modification through Congressional action. The Inyo plan cannot modify or violate Federal law.

Additionally, there is a Region 5 order (Order No. 88-4) that prohibits using or possessing a bicycle (except by special-use authorization) in or on any portion of the Pacific Crest National Trail under Forest Service jurisdiction. The Inyo plan cannot modify or violate Region 5 Order 88-4. On all Federal lands (BLM and National Park Service), the trail is closed to bicycle use unless it is on an interim route that is also legally open to motorized use.

And finally, the Pacific Crest Trail as defined by the National Trails Systems Act (Pub. L. 90–543 Sec. 7(a) and (c) , 82 Stat. 919, enacted October 2, 1968) shall be administered primarily as a footpath and horseback riding trail by the Forest Service in consultation with the Secretary of the Interior (36 CFR section 212.21).

4207

I am strongly opposed to any alteration of the wilderness plan, most specifically any alteration that will allow mountain bicycles on trails in designated wilderness.

Response: The Wilderness Act was enacted through Congressional action and prohibits using mechanical devices (for example, mountain bicycles) within the wilderness. The Inyo plan cannot modify or violate Federal law.

4208

Mountain biking should not be permitted on any trail. Bikes should be restricted to paved roads, where they can't do much harm, or not allowed at all.

Response: The Multiple-Use Sustained-Yield Act (15 Public Law 86-517) states “it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.” Many distinctive roles and contributions of the Inyo National Forest are recognized and described in chapter 1 of the final plan (final plan, chapter 1, Introduction, Distinctive Roles and Contributions of the Plan Area). This section highlights the importance of the providing and maintaining these beneficial multiple-uses of the national forest. The benefits provided from all of the Inyo’s contributions described in this section provide tremendous, ecological, social, and economic value. The final plan has identified long-term or overall desired conditions and provide general direction for achieving those desired conditions organized by resource, under two broad major categories: (1) Ecological Sustainability and Diversity of Plant and Animal Communities; and (2) Social and Economic Sustainability and Multiple Uses. Within these categories, the final plan includes specific desired conditions pertaining to Air Quality, Watershed Condition, Terrestrial Ecosystems and Vegetation, Animal and Plant Species, Invasive Species, Fire, Sustainable Recreation, Scenery, Timber and Other Forest Products, Rangeland Livestock Grazing, Geology and Mineral, Energy, and Cultural Resources (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). Also provided in the final plan are objectives, goals, standards, and guidelines, which were designed to work together, in an integrated way to achieve or maintain desired conditions (final plan, chapter 2, Forestwide Desired Conditions and Management Direction). All of these plan components work together as a whole to meet the requirements of the 2012 Planning Rule (36 CFT 219.8 through 219.11), National Forest Management Act of 1976 (P.L. 94-588), and the Multiple-Use Sustainable-Yield Act. The purpose of forest plans are to guide how National Forest System lands are managed, forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. They are focused on outcomes and are intentionally flexible to allow management to adapt to local conditions. They do not specify particular methods on “how” the desired conditions outlined in the plan are met. Forest plans and plan components do not specifically prevent any

action, project, or activity from occurring on the Inyo, nor do they compel any action, project, or activity (final plan, chapter 1, Introduction, Purpose of the Forest Plan). In order to prohibit mountain biking on trails and restrict riding to paved roads would require a separate analysis and decision.

4209

Mountain biking should be allowed in wilderness areas.

Response: The Wilderness Act was enacted through Congressional action and prohibits using mechanical devices within the wilderness. The Inyo plan cannot modify or violate Federal law.

4210

Any further involvement of the Federal government in land/resource management is not welcome and unnecessary. All federally controlled land within the borders of California should be managed through the consent of the voters of the state.

Response: All National Forest System lands are collectively owned by the American people through the Federal government, and managed by the U.S. Forest Service, a division of the USDA. The National Forest System was created by the Land Revision Act of 1891. The National Forest Management Act of 1976 is a U.S. Federal law that is the primary statute governing the administration of national forests. The main objectives of National Forest Management Act are to require the U.S. Forest Service to develop plans for national forests, set standards for timber sales, and create policies to regulate timber harvesting. The purpose of these objectives is to protect national forests from permanent damages from excessive logging and clear cutting. Congress requires the Forest Service, in conjunction with other applicable agencies, to thoroughly assess, research, and plan for the nation's renewable resource use, the current demand, anticipated demands, and environmental and economic impacts. The Inyo National Forest personnel manage the land as directed by the Land Revision Act of 1891 and the National Forest Management Act of 1976. Any changes to governing body of National Forest System lands within California would require new or amended legislation be passed by Congress.

Monitoring

4219

The monitoring program does not detail how baseline data and reoccurring monitoring will be implemented in order to achieve desired conditions. The final plan must have an effective way to track and guide.

Response: The plan monitoring program does not include details about the implementation of the monitoring program because that is not requirement for the plan monitoring program in the 2012 Planning Rule (36 CFR 219.12). However, that implementation-related information will be addressed in a separate monitoring guide (as outlined in the Forest Service Handbook FSH 1909.12 chapter 30 section 32.2).

4220

You need to address the scientific uncertainty of the effectiveness of the activities that are proposed and allowed by the forest plan (the project).

Response: Uncertainty is addressed throughout chapter 3 of the final environmental impact statement where assumptions used in the environmental analysis are disclosed (final

environmental impact statement, chapter 3, Affected Environment and Environmental Consequences). In order to analyze or estimate the consequences of alternatives at the programmatic plan level, many assumptions were necessary regarding the types of management activities, as well as, the type and extent of natural processes, which may occur. Each disclosed assumption made in the analysis of alternatives innately acknowledges uncertainty. Where deficiencies were specifically identified regarding specific assumptions or uncertainties by commenters, modifications were made to clarify the level of uncertainty. More detail has been added to better define the assumptions relied upon in the analyses in the final environmental impact statement where deficiencies were identified (final environmental impact statement, volume 1, chapter 3, Introduction, Science and Assumptions Used in the Environmental Analysis; and within each "Assumptions" section found within each subsection of final environmental impact statement, chapter 3).

4221

Meadow conservation requires long-term engagement through monitoring before and after initial actions, and adaptive management in response to monitoring observations and changing conditions. Ideally, long-term funding to support monitoring and adaptive management is built into all restoration project funding packages, as is adequate funding to monitor and adaptively manage effects of restoration at watershed and landscape scales. Project funding should include resources to cover project design, planning and permitting. For more information on restoration in meadows, examples of different types of restoration actions that have been used at the time this strategy was developed, and lists of information sources on restoration actions, see Stillwater 2012 and Norman 2015, and the U.C. Davis Meadow Clearinghouse (http://meadows.ucdavis.edu/projects).

Response: Inyo National Forest looks forward to continuing to collaborate with our partners in meadow restoration. The regional forester has made meadow restoration a Region 5 priority in the leadership intent. The plan monitoring program is not intended to specifically track or fund individual restoration projects, but it does include monitoring meadow condition over the long-term both inside and outside of range allotments (see monitoring questions AE01, AE02, and AE03; in the final plan, volume 1, chapter 4, Forest Plan Monitoring).

4222

Specific recommendations for monitoring riparian conservation areas related to grazing.

Response: Monitoring question AE02, under the Aquatic Ecosystem category in chapter 4, has been added to the plan monitoring program to specifically address monitoring riparian areas across different management areas and disturbance regimes (final plan, volume 1, chapter 4, Forest Plan Monitoring). This would include riparian conservation area in grazed areas. In addition, AE01 remains in the plan monitoring program and specifically compares vegetative condition inside and outside of range allotments (final plan, volume 1, chapter 4, Forest Plan Monitoring). Monitoring and analysis protocols, data collection schedules, responsible parties, and data management will be part of a separate monitoring guide (anticipated to be available by mid-2018).

4223

Basic rangeland indicators used across three forests are also different. How can range condition be compared regionally or assessed in a similar, unbiased way if measures are different on every forest?

Response: Differences in indicators is a matter of differences in conditions between national forests. The vegetation types, climate, current conditions, and past and current uses of each national forest varies somewhat. The indicators specific to the Inyo National Forest can be found in a forest supplement to the R5 Rangeland Analysis and Planning Guide (R5-EM-TP-004). The assessment procedures, also found in the Rangeland Analysis and Planning Guide, remain consistent across the national forests according to the indicators being used and locations where they are being applied. Additionally, the Region 5 Long-Term Rangeland Monitoring Program is consistently applied across all national forests using the same methodology, inventory crews, and takes into account the appropriate site potential at each location.

4224

In order to ensure compliance with the Clean Water Act and Porter Cologne requirements, as well as compliance with the Basin Plan, all three forest plans must address the issue of water quality contamination by forest activities, especially pathogenic bacteria pollution caused by livestock. Specifically, the Forest Service needs to commit to undertake State Water Board protocol-consistent water quality sampling in areas of the Sierra, Sequoia, and Inyo National Forests where high levels of recreational use overlap with livestock grazing - creating the potential for contamination that poses significant health risks to forest visitors.

Response: Monitoring question AE03, under the “Aquatic Ecosystem” category in chapter 4 of the final plan (final plan, volume 1, chapter 4, Forest Plan Monitoring, Aquatic Ecosystem), has been added to the Forest Plan Monitoring Program to specifically address water quality status and state-designated beneficial uses.

4225

Alternative B must be strengthened throughout by adding specific standards and guidelines for measuring how the agency is progressing as it strives to implement the new plan.

Response: There are several areas in the plan that will be used to measure the progression of implementing the new plan. Objectives demonstrate what we will manage to achieve within a given timeframe of the plan’s approval. These objectives highlight actions needed to start moving toward desired conditions. These objectives include: WTR-FW-OBJ 01; TERR-FW-OBJ 01-03; SPEC-SG-OBJ 01; INV-FW-OBJ 01 and 02; REC-FW-OBJ 01-04; SCEN-FW-OBJ 01; TIMB-FW-OBJ 01; CULT-FW-OBJ 01; MA-CW-OBJ 01; MA-RCA-OBJ 01; RCA-MEAD-OBJ 01; RCA-RIV-OBJ 01-02; and MA-GRA-OBJ 01.

Objectives are just one measure we can use in describing how its achieving progress in the plan. Standards and guidelines can also demonstrate moving toward desired conditions. These are demonstrated at the project-level when activities are proposed and occur on the Inyo National Forest. The commenter did not provide specific recommendations on any additional needed standards and guidelines, therefore no changes to standards and guidelines were made in response to this comment.

The forest plan monitoring program is the last tool we will use in demonstrating how the Inyo is progressing in implementing the plan. This monitoring plan, found in chapter 4 of the final plan, outlines specific monitoring questions and indicators tied to identified desired conditions for several resource areas, including: watershed condition, terrestrial ecosystems, aquatic ecosystems, focal species, ecological conditions for at-risk species, visitor use, visitor satisfaction, and recreation, climate change and other stressors, progress toward meeting the desired conditions, objectives, or other plan components, and productivity of the land. We will complete a bi-annual monitoring report, which will be available to the public as described in the 2012 Planning Rule (36 CFR 219.12) and Forest Service directives (FSH 1909.12 chapter 30 section 34) and will provide information on if there is a change needed in the plan, a change needed in management activities, change needed in the monitoring program, or if an assessment is needed to determine if there is a preliminary need for change.

4226

Visitor use and satisfaction monitoring of the plan monitoring program should include an indicator related to user conflicts specifically related to REC-FW-DC-05 (conflict between different recreation users are infrequent).

Response: Monitoring question VU01 uses the national visitor use and monitoring (NVUM) data to evaluate visitor use and satisfaction in the Inyo National Forest. This information will assist us to identify what resources are most used by the public and how satisfied the public is with those resources. This will help guide future management actions. The plan monitoring program is not intended to track specific conflicts between different user groups because it is a subjective and somewhat ambiguous thing. User conflict that involves potentially illegal activities should be reported to law enforcement immediately.

4227

The "productivity of the land" section in the plan monitoring program and associated statements related to timber and related soil disturbance monitoring (for example, fire) should be incorporated into other monitoring plan sections such as terrestrial ecosystems.

Response: Timber and soils disturbance are monitored specifically under the "Productivity of the Land" category in monitoring question PR01 of chapter 4 because it is a requirement under National Forest Management Act. Monitoring question WS02 has been added to the plan monitoring program under the "Watershed Condition" category of chapter 4 to specifically address soil sustainability related to road and trail erosion.

4228

In the plan monitoring program, "Terrestrial Ecosystems" section, under the fifth question (related to TERR-OLD-DC-03/04), include large snags and large downed logs as part of the monitoring question and indicators associated with these desired conditions.

Response: For monitoring question TE01, under the Terrestrial Ecosystem category in chapter 4, the associated indicators of snags and large downed logs per acre have been added to large trees to better address desired conditions (see TERR-OLD-DC-03).

4229

Include water quality monitoring to ensure that Clean Water Act requirements are met in watersheds or aquatic ecosystems that experience grazing practices.

Response: See response to comment 4224.

4232

Include monitoring requirements in the grazing standards and guidelines for at-risk plants that are threatened by grazing. Develop multi-year monitoring approach that is generally based on the Riparian Conservation Area guidelines in the Sierra and Sequoia draft plans (Guidelines MA-RCA-GDL 15 and 16).

Response: Although specific monitoring requirements for at-risk plant species potentially threatened by grazing have not been added to the final plan in the grazing standards and guidelines, other additional standards have been added to the final plan that address the potential threats of grazing to at-risk plants on the Inyo (final plan, volume 1, chapter 2 and 3) and require a component of monitoring or evaluation in order to assess the achievement of the desired condition or implement the standard: RANG-FW-DC 01; RANG-FW-DC 03; RANG-FW-STD 01; MA-RCA-STD 12; TERR-XER-DC 01; TERR-XER-DC 02; TERR-SAGE-DC 01; TERR-SAGE-DC 02; TERR-SAGE-DC 03.; TERR-SAGE-DC 01 and TERR-SAGE-DC 02 also are specifically included in the forest plan monitoring program with associated monitoring questions and indicators (see final plan, volume 1, chapter 4, Forest Plan Monitoring).

4233

Develop a prioritization system for at-risk plant species monitoring based on science information. This prioritization should be informed by botanical specialists and scientists.

Response: A prioritization system for monitoring at-risk plant species has not been included in the plan monitoring program. Instead, we will address at-risk plants by monitoring plan effectiveness for key habitat types, including special habitats, where at-risk plants can occur. The key habitat types identified in the plan monitoring program are: pinyon-juniper (TE02), sagebrush (TE03), meadows (AE01), riparian areas (AE02), and special habitats (AR01). In particular, AR01 will give scientists on the Inyo National Forest more opportunities to identify when and where the integrity of special habitats for at-risk species is being compromised.

4234

Ensure that a wide range of recreation and visitor uses are represented in the visitor use/satisfaction indicators of the plan monitoring program. Monitoring indicators related to recreation and visitor use strive to capture broad visitor feedback.

Response: The visitor use monitoring questions, under the visitor use, visitor satisfaction, and progress toward meeting recreation objectives in chapter 4, have been modified to capture a wider range of activities and facilities. For example, associated indicators now include trail availability (monitoring question VU02), visitor communications (VU03), and wilderness character (VU04). The visitor satisfaction monitoring indicators (VU01) have been modified to include the national visitor use monitoring (NVUM) data collection, which encompasses all aspects of visitor satisfaction. Currently, general visitor feedback is not specifically addressed in the forest plan monitoring program, but our staff can be contacted directly or with available comment cards at various facilities.

4235

The plan monitoring program should provide additional monitoring that supports science-based adaptive management. This additional monitoring should help evaluate whether desired conditions in the new forest plans are being met.

Response: The forest plan monitoring program (final plan, chapter 4) was modified to better facilitate science-based adaptive management and coincides with parallel changes made to the final plan. The changes made to the forest plan monitoring program will provide better information evaluate the effectiveness of management actions and based on this assessment, identify where and when adaptive management is needed in the final plan.

In particular, the monitoring questions and associated indicators have been refined to better facilitate adaptive management (final plan, chapter 4, Forest Plan Monitoring). Monitoring and analysis protocols, data collection schedules, responsible parties, and data management will be part of a separate monitoring guide (anticipated to be available by mid-2018). Monitoring will be conducted annually, for many, but not all, monitoring components. The information gathered as a result of the monitoring efforts will be evaluated every two years and documented in a biennial evaluation report. The forthcoming monitoring guide and associated biennial evaluation report will advance the adaptive management approach outlined in the 2012 Planning Rule by increasing the reporting and transparency of the forest plan monitoring program.

4236

In social and economic monitoring of the plan monitoring program, include specific targets related to economic monitoring.

Response: Monitoring questions PC01 and PC02 of the plan monitoring program under the "Progress Toward" category in chapter 4 include a range of economic indicators. These indicators will yield specific economic information on contributions from the Inyo National Forest and the conditions in local communities. Specific targets are not included in the monitoring question because there are not specific economic targets in the plan.

4237

Monitoring plan questions should be associated with trigger points that initiate changes in forest management.

Response: Trigger points have not been included in the plan monitoring program because they are not a requirement of the 2012 planning rule and could potentially complicate the implementation of the forest plan or future projects. In the context of adaptive management, triggers can be useful when they system being managed is relatively simple, but they can also be overly restrictive when unanticipated events commonly occur. Therefore, given the complexities of the many different ecosystems on the Inyo National Forest, we are choosing to explore the idea of "alerts" in the biennial evaluation monitoring report. Alerts serve a similar function as triggers—by identifying when a monitored variable is outside of the desired range or below/above a certain level—but don't confine the response to some pre-determined action that may or may not be appropriate at a future time.

4238

The plan monitoring program should link the implementation of projects with the results and completion of monitoring.

Response: The overarching purpose of the plan monitoring program is to evaluate the effectiveness of the forest plan with a focus on a course-filter approach (for instance, key ecosystem characteristics), it is not linked to any specific projects. Still, some of the associated indicators for various monitoring questions are information that is generated through project implementation. For example, monitoring question WS02 asks about soil erosion associated with roads and trails. The indicators include information that is collected during project-specific best management practices reporting (BMP).

4241

The U.S. Forest Service should augment monitoring data by providing standardized, easy-to- follow feedback procedures to allow visitors to report problems. Visitors can provide an early (or late) warning system when acute damage occurs to an area (for example, fires, illegal marijuana-growing operations, or poor human waste disposal).

Response: The U.S. Forest Service recognizes the value of utilizing other federal and state agencies, tribes, partners, and the general public to accomplish monitoring efforts throughout the national forest. We appreciate any and all information gathered by visitors to the Inyo National Forest and recognize that a standardized means in which to report problems witnessed on the ground would be mutually beneficial. We recognize the value of continuing to develop effective partnerships, wherein we invite public participation, embrace stakeholder proposals, and successfully leverage our resources by working together to achieve the desired conditions set forth in the forest plan. Appendix C of the final plan (final plan, appendix C, A Renewed Partnership Focus for the Inyo National Forest) includes; (1) additional partnership goals; (2) describes a partnership capacity assessment tool that will be used to help assess, sustain and improve our ability to work with partners and maintain our long history of partnership and collaboration in land stewardship; (3) best practices we will use to identify and develop new partnerships; and (4) steps for ensuring effective outreach and communication with nontraditional partners and the public.

4243

Establish a firm and solid baseline regarding livestock grazed lands through site-specific systematic surveys for native biota during appropriate periods of the year. Systematic site-specific surveys for all sensitive species occurrence and occupied habitats must be conducted to understand the quality and quantity of habitats, degree of fragmentation, etc.

Response: The Inyo reviewed its rangeland assessment procedures (methodology) and updated its rangeland assessment procedures incorporating best available science information (best available science information). These updated procedures were added as a forest specific supplement (Inyo Supplement 1-2017) to the Region 5 Pacific Southwest Rangeland Analysis and Planning Guide (R5-EM-TP-004). Procedures included in the R5 Rangeland Analysis and Planning Guide may be updated as needed without the need for a forest plan amendment. Inyo Supplement 1-2017 (R5-EM-TP-004) will be released by the forest supervisor when the final record of decision is signed.

Inyo Supplement 1-2017 includes updated rangeland standards that will allow the Inyo to sustain and improve rangeland ecosystems. The standards are summarized in matrices based on

vegetation condition, vegetation type, grazing system, and site-specific hydrologic function. Inyo Supplement 1-2017 provides the framework in which to survey or evaluate site-specific key grazing areas in order to identify, categorize and respond to readily apparent problems. Inyo Supplement 1-2017 also describes a list of potential problems and possible corrective actions that may be applied in order to reach management goals. Actual problems and solutions, will normally be identified and developed on an individual, site-specific basis.

Cooperating Agencies

4244

EPA and the Forest Service have responsibility for protecting and maintaining habitat for threatened and endangered species that exist in habitat that is fire dependent, but the draft environmental impact statement does not make it clear that in the draft environmental impact statement that the Federal EPA has multiple jurisdictional responsibilities beyond the Clean Air Act and its requirements to protect public health, including responsibilities to maintain a high level of integrity in National Environmental Policy Act analysis and protection of threatened and endangered species; therefore, include language in the draft environmental impact statement that addresses the responsibilities of the EPA and considers reintroduction of fire to the landscape, which would benefit several resource areas under Federal EPA and state jurisdiction.

Response: The EPA is identified as a cooperating agency in the final environmental impact statement. The language related to their cooperating agency role has been clarified in the final environmental impact statement in response to this comment (final environmental impact statement, chapter 4, “Federal Agencies and Representatives” section). As we considered potential trade-offs related to desired outcomes, including forest and aquatic resource restoration, public health and wildlife habitat, the EPA shared helpful information to analyze alternatives. For example, the EPA emphasized the role of fire in restoration, and alternative B-modified includes that approach where safety and public health concerns can be effectively addressed.

The forest plan includes the goal of returning fire to its natural role as a part of a functioning ecosystem. Fire management was identified as a key revision topic and is a significant issue that drove alternative development (final environmental impact statement, chapter 1, From Needs for Change to Revision Topics section; and final environmental impact statement, chapter 1, “Issues that Served as the Basis for Alternative Development” section). Each alternative was developed to bring fire back to the landscape to varying degrees.

Social Issues

General

5000

The process did not consider the history and traditions of mule packing.

Response: Commercial pack stock operations were mentioned throughout the forest plan (for example, in the final plan, chapter 1, Distinctive Roles and Contributions of the Plan Area), the final environmental impact statement, and the Inyo National Forest Assessment. The assessment, which was used to inform the plan and the final environmental impact statement , stated, “On the Inyo National Forest wilderness also supports commercial pack stocking, providing local business opportunities,” (Inyo National Forest 2013a, p. 197). The economic effects of pack stock use

were grouped with other recreational uses, such as fishing, backpacking, climbing, and skiing (final environmental impact statement, chapter 3, "Economic Conditions, Tourism and Recreation" section).

5001

It is imperative the environmental impact statement consider the effects of active management, particularly thinning these forests to sustain economic forest contributions. This will lessen large fire mortality, size and the associated costs of wildfire.

Response: In the "Benefits to People and Communities – Economic Conditions" section of chapter 3 of the final environmental impact statement the effects analyses include examination of silvicultural practices (including fuel reduction treatment through thinning) designed to contribute to the restoration of a more resilient landscape. This includes analysis of the short and long-term effects of forest management on key forest benefits to people and analysis of the economic contributions that are provided through employment, income, commodities and access to forest resources and settings. The benefits of fuels reduction treatments on large fire mortality and wildfire costs are analyzed under "Revision Topic 1: Fire Management."

5002

The environmental impact statement provides no discussion of where or how the good intentions of ecological restoration will be funded.

Response: The potential for funding additional restoration and the resulting challenges are examined in the final environmental impact statement, chapter 3, Economic Conditions – Financial Examination.

5003

Plant community diversity supports a wide range of important cultural uses Plant community diversity in the Sierra Nevada supports a wide range of beneficial uses. On the Inyo, Sequoia and Sierra National Forests plants are harvested for food (for example, mushrooms, fruits, ferns), medicines, floral greens, seeds and cones, and transplants. Mushroom hunting can be especially lucrative, with foragers selling products to upscale restaurants for over $60 a pound. To support these uses, many non-profits have classes on foraging and the importance of native plants, such as the California Native Plant Society. The environmental impact statement analysis needs to recognize this important contribution.

Response: Forest biodiversity is a key forest benefit that supports the botanical species that are important for plant gathering. This biodiversity is examined in the "Ecological Integrity" section of chapter 3 of the final environmental impact statement. The benefits provided by plant gathering are examined in the "Benefits to People and Communities – Economic Conditions" section of chapter 3 of the final environmental impact statement.

5004

Sawmills need a reliable supply of wood from our national forests. Sawmills not only form a vital part of the local economy, but also provide a destination for wood from the sustainable management of private lands. The environmental impact statement needs to examine this effect.

Response: Commercial forest product opportunities (beyond fuelwood and other specialty wood markets) on the Inyo National Forest will continue to be limited due to the vegetation available

for harvest on the Inyo National Forest and the haul distance to existing mills. Therefore, timber supply was not examined as a key benefit available from increased restoration activities. Opportunities to utilize biomass will remain the same for the first decade of the analysis period, but could increase in the second decade if a demonstrated consistent supply of biomass results. This consistent supply of biomass could create the potential for future investment in and development of local biomass facilities.

5005

The California ranching industry relies on the rangeland available on national forests. The environmental impact statement should include additional analysis of livestock grazing activities in both rural communities and to related base properties.

Response: The importance of grazing to the local economy and the potential impacts on grazing for the plan alternatives have been added to final environmental impact statement , chapter 3, "Economic Conditions – Key National Forest Contributions" section and "Economic Contributions – Forest Contributions Examination" section.

5006

The youth of this country are increasingly becoming detached from real-world activities and pursuits such as those they can experience in the National Forest. As our younger generation in America ever more enthusiastically gathers around the screens of smartphones and video game consoles, it is foolish for the forest to be put further out of reach of members of the public. If young people don't get up and get out into the national forest and enjoy recreational activities there, can we expect them to develop a lifelong value for the forest (and the parks)? By keeping the public out of the forest, and encouraging them to stay away from forest activities, we invite future generations that fail to value the forest, the parks and wild areas in general.

Response: The Inyo National Forest personnel intend to serve all the American people and welcome visitors to the Inyo. We minimize forest closure to the maximum extent and when areas of the national forest are closed, it is to address the health and safety of visitors or to protect key resources during times of particular vulnerability (for example, wet soils leading to excessive erosion, sensitive wildlife denning or nesting, fire, or other factors)

The final plan includes components specifically addressing the need actively engage youth and to help connect people to the benefits of the national forest and to develop a stewardship ethic (REC-FW-GOAL-03, TRIB-FW-DC-05, .LOC-FW-DC-05, VIPS-FW-GOAL-06_.

5007

Provide adequate signage and educational opportunities for visitors including multi-lingual.

Response: The Inyo Forest Plan addresses both signage and visitor education. It includes the following plan components.

DA-MBDRZ-DC-03, "Information is provided primarily by signs, displays, or printed material…"

CULT-FW-DC-02 "Cultural resources provide educational opportunities that connect people to the land and its history…"

TRIB-FW-DC-05 "The Inyo National Forest provides a setting for the education of Tribal youth in culture history and land stewardship."

LOC-FW-DC-05 "The Inyo provides interpretation and education opportunities related to culture, history and land stewardship…"

Volunteers, Interpretation, Partnership and Stewardship potential management approach "Develop bi-lingual communication tools including publications, information boards and radio spots."

Public Involvement

5008

The environmental analysis process is too complex and does not properly address the significant issues affecting motorized recreationists; requesting for the U.S. Forest Service to take the interests of motorized recreationists into account.

Response: Although complex, the environmental analysis process was enacted by Congress to help provide the public with information on the environmental effects of government actions and to help inform the decision-maker of impacts leading to better decision-making. We must follow Federal law adhering to the environmental analysis process outlined in the regulations. The Inyo National Forest final environmental impact statement discusses the process undertaken to identify significant issues in the "Issues" section.

The plan was developed to address motorized and non-motorized use, including desired conditions directing the Inyo to offer a broad range of recreation activities (Inyo Plan REC-FW-DC 01); recreation opportunities offer a high level of visitor satisfaction and safety (Inyo Plan REC-FW-DC 02); Conflicts between different recreation uses are infrequent (Inyo Plan REC-FW-DC 05); and trail opportunities are available in a variety of settings that provide differing levels of challenge and types of experiences (Inyo Plan REC-FW-DC 07); and the trail system provides a variety of motorized and non-motorized recreational opportunities during summer and winter and distributed across the national forest.

We considered all comments and public input received during various phases of public involvement including the interests of motorized recreationists and has weighed and balanced that input in light of forest management issues and effects.

5009

Public meeting did not allow for an open forum and did not cater to all interests.

Response: All public meetings hosted by the Inyo and a third-party facilitator, were developed to provide information to the public in different formats depending on the topic being discussed. For example, many of the meetings during the comment period were designed to share information about the draft documents and then an open house format so individuals could ask specialists questions. During the development of these meetings it was recognized that an open format where one person asked a question at once did not allow for the majority of the people attending to have their questions answered. This was why an open house format was chosen. The topics included during these meetings were based on those areas that were identified as a revision topic or issue included (environmental impact statement, Summary Document, May 2016).

5010

Few opportunities for input on grazing during public participation events.

Response: See response 4057.

5012

The County's General Plan interfaces with the forest plan. It is vital that forest management addresses these plans.

Response: See response for 4184.

5013

The forest and Rangeland Sector Companion Plan was developed with participation from state and federal forest agencies, conservation organization, and the timber and rangeland industries. Since they were developed through an external collaboration process, including U.S. Forest Service, we believe the companion plans are very relevant to the forest plans, and we encourage you would consider these plans, in addition to SWAP 2015, for the further development and the implementation of the forest plans.

Response: Coordination of agency goals is beyond the scope of forest plan process, however, some Forest Service employees are team members affiliated in the development of the Forest and Rangeland Sector Companion Plan. This plan aligns with the Forest Service's mission "To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations."

A key component of "State Wildlife Action Plan" (SWAP) 2015 is the development of the list of species of greatest conservation need (SGCN). This California state classification system is one of the key considerations that are used in evaluating species for listing as species of conservation concern.

5014

Develop an analysis of proposed plan components and previously applied standards and guidelines and best management practices to provide a risk assessment of sensitive species and habitats.

Response: Biological evaluations regarding sensitive species and habitats for plants and animals are included with the final environmental impact statement and address the preferred alternative (Alternative B-modified) and refer to the no action alternative (alternative A). For sensitive species that are listed as species of conservation concern, the final environmental impact statement follows the species specific persistence and viability analysis required by the 2012 Planning Rule for all species of conservation concern (36 CFR 219.9(c)), as directed in FSH 1909.12, chapter 20, section 23.13c; Persistence Analysis in final environmental impact statement Appendix F). The rule requires the plan have plan components, including standards or guidelines, to maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range. The effects analysis for at-risk animal and plant species is in chapter 3, revision topic 2 of the final environmental impact statement. Species habitat impact analysis is addressed in the analysis of specific ecosystem types in revision topic 2, in the terrestrial ecosystems section. The biological evaluation addresses impacts to sensitive species that are not listed as species of conservation concern and how the plan addresses viability of these species (Engelhardt 2017 and Olmedo 2017).

5015

Information about the plan revision was not made known to a more widespread base of the people. Most avid outdoorsman have had zero notice of this proposal. Posting it to your website is not an acceptable means of notice.

Response: See response 8013 and 8177.

In addition, our outreach not only included posting information on our website, but email notifications; press releases published in the local newspaper of record and on our Facebook page; radio announcements; and we hosted two public meetings in San Francisco and Los Angeles (record of decision, "Public Participation" section and final environmental impact statement, chapter 1, "Public Participation" section).

5016

Although the current forest land management plans revisions are for the Inyo, Sequoia and Sierra National Forests, we realize the process they undergo will set a precedent as to how additional national forests in California are managed when they undergo plan revisions under the U.S. Forest Service's new Planning Rule.

Response: It is efficient for an agency to utilize past experience and developed documents as a starting place for future work however each additional Forest that undertakes Forest Plan Revision will do so in light of their own Forest specific assessment, need for change, roles and contribution and based on how the decision-maker guides the process. Many lessons have been learned through the experience of developing the Inyo's Forest Plan and final environmental impact statement under the 2012 Planning Rule and those lessons will lead to refinements in approach, analysis and plan components. There is nothing in the 2012 Planning Rule or other Forest Service law, regulation or policy that requires subsequent Forests to use the Inyo's Forest Plan and final environmental impact statement as a "precedent" that must be followed.

5017

We attempted early in the comment period to obtain the information from the Planning Team that was relied upon in the analysis. The information we requested ranged from GIS data to references cited in the environmental impact statement and supplemental reports. We also requested a copy of the project file in an effort to streamline our request. Only a small fraction of the requested materials was provided to us as of the submission of these comments. We also requested to meet with the analysts responsible for preparing the information on fire and forest ecology, but our request to meet to discuss the methods and assumptions was denied. These barriers to information access have significantly impeded our ability to review and comment on the environmental impact statement and draft plans.

Response: We received a request for information regarding fire-climate modeling on July 18, 2016. This request was responded to on July 28, 2016 and addressed several questions raised regarding: 1) baseline data on fire occurrences; 2) historic reference fire regime condition class (FRCC); 3) regression analysis; 4) selection of treated cells was random; 5) historic reference fire regime condition class data and how was it created; 6) fuels data vs vegetation condition class; 7) accounting for the changes in fire regime condition class over a time period; 8) testing to determine importance; and 9) changes in fuel conditions that drive treatment benefits (USDA email response to information query, July 28, 2016). In addition to this reply, information pertaining to the development of the environmental impact statement, including GIS information was made available to the public on the plan revision project website,

https://www.fs.usda.gov/project/?project=3375. This information was updated throughout the comment period when new requests for information came forward. This was noted by the date next to the documents. Information included in the project website under "Supporting Documentation" includes: public engagement schedules; frequently asked question documents for fire zones, final science consistency fact sheet, monitoring, species of conservation concern, Wild and Scenic Rivers and wilderness; species of conservation concern species rationales and lists; supplemental reports for air quality, best available scientific information, biological evaluations for animals and plants, botany, carbon, complex early seral forests, economics, fire ecology, fire-climate, fisher management comparison, monitoring, old forest, owl management comparison, southern sierra wildfire risk assessment results, southern sierra wildfire risk vegetation condition, terrestrial connectivity, terrestrial vegetation ecology, and terrestrial vegetation resilience; GIS data for critical aquatic refuges, ecozones, fire management zones, pacific crest trail, places, potential wildland fire operational delineations, recreation opportunity spectrum, riparian conservation areas, scenic integrity objectives, timber suitability, areas analyzed that may be suitable for inclusion into the National Wilderness Preservation System, Wild and Scenic Rivers, Natural Resource Information System (NRIS): Wildlife, and Dry Mesic raster; wilderness maps for the evaluation and analysis; and references, including Westerling, 2015 and 2016.

Tribal/Cultural/Heritage

5019

Many places in the documents that refer to the "public" or to a list of federal agencies should also include reference to Tribes.

Response: The plan has been updated to include additional Tribal references where appropriate. Where "public" is used in its most inclusive sense to reference to the entire general population, additional reference to Tribes was not inserted (for example, AIR-FW-GOAL-02, FIRE-FW-DS-01, REC-FW-DC-06, GEO-FW-DC-01, CULT-FW-DC-04).

5020

Food gathering activities are mentioned, but in my opinion, the plan omits the key commodity - pinyon nuts. Add more discussion on the importance of pinyon nuts.

Response: The Inyo National Forest contains an abundance of resources and values important to tribes, some of which are generally known and others that are not. The plan makes only broad reference to these values to be inclusive as well as discreet (for example, Distinctive Roles and Contributions of the Plan Area, TRIB-FW-DC-03). The particular importance of pine nuts to area Tribes is acknowledged by the continuance of a prohibition on commercial collection of this resource (TIMB-FW-STD-03).

5021

California's wild plant communities are of great significance to Native Americans. The USDA Natural Resources Conservation Service identified 31 plants of cultural significance to Native Americans in the Sierra Nevada Mountains and foothills for food, medicines, jewelry, household items, art and tools. Basket weaving for both commercial and artistic usage has been a key cultural activity of many Native American tribes of California, who utilize several varieties of *Carex barbarae*, commonly known as white root, as a medium. Valley oak riparian woodlands are one of this species' primary

plant communities. Currently only 5% of this habitat remains, though the practice of basket weaving white root continues on.

Response: The Final Plan includes direction relating to plants and other resources of cultural significance to Native Americans. The plan includes a desired future condition of maintaining Tribal access to resources and values important to cultural identity and continuity (for example, TRIB-FW-DC-03). The plan also includes an objective to implement restoration actions to enhance resource availability (TERR-FW-OBJ-03) and a desired future condition that plants traditionally used by Tribes thrive on the national forest (TERR-FW-DC-09). USDA Natural Resources Conservation Service *Carex barbarae* distribution mapping indicates this species does not occur on the Inyo National Forest.

5022

The 3 action alternatives and the draft Forest Plans appear to continue a “flag and avoid” approach. Therefore, to use an "amount of ground disturbance that "might" occur under each alternative is not appropriate. No matter what the selected alternative will end up being, the Forests will continue to use a "flagged and avoided" approach to assure heritage resources are protected. Hence, the entire consequences by alternative section is totally misleading and not helpful for the Decision maker to make an informed decision.

Response: As described in chapter 3 of the final environmental impact statement (see in Revision Topic 3), site-specific effects on heritage resources are considered at the outset of every planning process. At the programmatic level of Forest Planning, there are no site-specific activities proposed that can be considered and quantified with respect to assessing effects on individual historic properties. As you note, a “flag and avoid” approach to protecting all identified sites for all future undertakings is described as how we currently manage for heritage resources for small foot-print projects and has led to sites not being evaluated, so they must be treated as if they are historic properties eligible for listing on the National Register of Historic Places (final environmental impact statement, chapter 3, “Revision Topic 3, Heritage Resources, Background” section). The analysis addresses risks to heritage resources relative to increased potential for high-intensity wildfire and fire suppression actions, as well as potential effects related to recommended wilderness designations for each of the alternatives. The indicator of amount of ground disturbance was used because adverse effects to heritage resources can occur with activities that cause ground disturbance (final environmental impact statement, chapter 3, Revision Topic 3, Heritage Resources, Analysis and Methods” section).

5023

The environmental impact statement' cultural discussion is limited to indigenous peoples. The cultural landscape includes much more. Euro-American cultural, history has deep ties including cattle and sheep grazing, mineral extraction, fishing, hunting, outdoor recreation and water export. Historic structures and landscapes, including working landscapes, are important. The environmental impact statement does not evaluate the impacts to the local culture as limits to these historic multiple uses become more and more limited. The environmental impact statement is incomplete based on the deficiency of the evaluations of impacts to local culture and the absence of the Euro-American landscape.

Response: The plan and final environmental impact statement include discussion of historic uses and Euro-American settlement and development of the landscape (final plan, chapter 1, Distinctive Roles and Contributions and final environmental impact statement, chapter 3,

Revision Topic 3, “Heritage Resources, Background” section). The final environmental impact statement also includes analysis of the effects of each alternative on grazing, mining, outdoor recreation, wildlife, fish, plant habitat and local economies. Fishing and hunting are regulated by the California Department of Fish and Wildlife and are not within the agency’s authority.

5024

The U.S. Forest Service refers to "significant" cultural resource but does not define what qualifies as “significant” and provide the appropriate reference.

Response: The use of the word significant was removed from the “Heritage Resources” section of the final environmental impact statement (final environmental impact statement, chapter 3, Revision Topic 3).

5025

Defining the term "class of property."

Response: References to this term are no longer found in the final plan, final environmental impact statement, or appendices to the final environmental impact statement.

5026

The impacts of dispersed recreation on Native American activities, sites, and uses should be recognized and managed. Horseshoe Meadows, Parker Bench, and Pizona Meadow areas are particular areas of concern.

Response: Forest plans are intended to be strategic, identifying long-term or overall desired future conditions and general direction for achieving these goals. The plan includes direction to ensure dispersed recreation does not impact natural and cultural resources (for example, REC-FW-DC-10) and to support Native American activities and practices (TRIB-FW-DC-03). This direction would guide any future project level analysis of proposed management actions at specific dispersed recreation areas such as Horseshoe Meadows, Parker Bench and Pizona Meadow.

5028

Minimizing impacts to resources, which also includes Native American sites, artifacts and uses, is also critical, and requires that recreation opportunities be appropriate to the landscape. Enforcement and education are key to protecting these resources.

Response: The plan includes provisions to ensure dispersed recreation does not impact natural and cultural resources (for example, REC-FW-DC-10), to support Native American activities and practices (TRIB-FW-DC-03) and to educate the recreating public about culture, history and land stewardship (LOC-FW-DC-05).

5029

The plan as stated, should move towards a new paradigm and treat archaeological sites not as one-specific isolated site. It must view sites as contiguous landscape regions. For instance, when one considers a city such as Bakersfield, it is inclusive in its reference as east, north, west and south Bakersfield. Indian sites on this land should also be considered in its totality. Indian people moved from one area to another and back again in order to take advantage of the many natural resources the land has to

offer. As a result the areas as we know them now with all the archaeological sites can be considered as one large contiguous township.

Response: Forest plans are intended to be strategic, identifying long-term or overall desired future conditions and general direction for achieving these goals. The boundaries of specific cultural sites are identified in accordance with the National Historic Preservation Act (NHPA) and the National Register of Historic Places (NRHP) at the project planning level. The National Register of Historic Places includes mechanisms for identifying broad site boundaries that encompass significant concentrations of archaeological sites and/or historically rooted cultural practices as you describe, including districts, rural historic landscapes and traditional cultural properties. Tribal knowledge shared during National Historic Preservation Act Section 106 project consultation can help ensure that appropriate decisions are made regarding property types and boundary delineation under the National Register of Historic Places.

5030

We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office, including additional commitments that are included as a part of the preferred alternative, be included in the final environmental impact statement.

Response: A list of Tribes involved and their participation process is included in the record of decision ("Engagement with State and Local Governments, Indian Tribes, or other Federal Agencies, and the Public" section), as well as within chapter 4, Consultation and Coordination, "Tribes and Tribal Organizations" section of the final environmental impact statement. Consultations with Tribal governments and Tribal Historic Preservation Office/ State Historic Preservation Offices have not resulted in any additional commitments in the record of decision. Letters, meeting agendas and notes, and any other comments related to Tribal and Tribal Historic Preservation Office/ State Historic Preservation Office consultation are included in the project record.

5031

Notify Tribes of future invasive weed projects * Recommend manual eradication if at all possible in areas of cultural sensitivity where Tribal members gather medicinal and plant resources * If herbicides is the only option - clearly mark area so that people can avoid collecting from treated areas and consult with tribal governments if the area is determined to be a potential gathering site.

Response: The plan includes goals to coordinate and cooperate with Tribes regarding invasive species management and to consult with Tribes before using pesticides or herbicides that may affect traditional gathering (INV-FW-GOAL-01, INV-FW-GOAL-02). Mitigations such as those proposed are appropriate to specific project planning efforts, such as the ongoing Forest Eradication and Control of Invasive Plants on the Inyo National Forest Environmental Assessment.

5032

Chapter 4, Guidelines, Cultural Resources: The U.S. Forest Service recommends that historic property protection provisions should be included in contracts and special use permits as applicable. It would benefit project proponents with special use permits on USFS lands to identify standard protection measures in advance to proactively plan

with these measures. Additionally, the USFS should add to this guideline a site confidentiality requirement to further protect sites with cultural resources.

Response: Special use permits are issued and renewed in compliance with National Historic Preservation Act Section 106. Site specific avoidance and protection measures identified during this review process are incorporated into permit terms and/or operation plans as appropriate. Site confidentiality is required by law and policy (for example, NHPA, ARPA, FSM 2360) and thus is not repeated in the plan. See final environmental impact statement Section Regulatory Direction for further explanation on the decision not to include existing law, regulation or policy.

5033

Chapter 3, Potential Management Approaches, Cultural Resources regarding user education, restrictions and visitation control to project sites from physical damage and excessive wear and tear, recommend that the U.S. Forest Service develop a forest-wide historic preservation plan that will programmatically manage cultural resources for long-term sustainability on the Inyo and Sierra National Forests like identified for the Sequoia draft plan. Additionally, recommend that the Inyo and Sierra National Forests develop a forest-wide cultural resource interpretation plan that provides educational information intended to reach a broad spectrum of forest visitors through hands-on field opportunities as well as education information. The U.S. Forest Service should allow the public to review and comments both plan prior to finalizing them.

Response: The following potential management approaches have been added to plan: “Develop a forest-wide historic preservation plan that will programmatically manage cultural resources for long term sustainability” and “Develop a forestwide cultural resource interpretation plan that provides educational information intended to reach a broad spectrum of forest visitors through hands-on field opportunities as well as educational information.”

5034

The Tribe suggests the Forest Service provide more opportunities for overnight use (for example, camping) by nearby tribal communities. The Forest Service and Tribe should discuss what the Tribe would like to see for opportunities to camp on nearby forest lands.

Response: The Inyo National Forest lies in the traditional territories of eight federally recognized Native American Tribes, as well as eight unacknowledged tribes, Tribal groups and organizations. We contact and consult Tribal communities, and consider them important partners in national forest management activities. There are several plan components that offer more opportunities for access, such as overnight use. For example, TRIB-FW-DW-03, Native Americans have access to areas that provide them an opportunity to practice traditional, cultural and religious lifeways, such as plant gathering, fishing, hunting and ceremonial activities that are essential in maintaining their cultural identity and the continuity of their culture; and TRIB-FW-GOAL-04, Meet regularly with Tribes to better understand their needs and viewpoints. Promote the use of Inyo-hosted Tribal forums and events, as well as attendance at tribally hosted meetings and events, as a method to ensure consistent contact, consultation and collaboration.

5035

Many of the Eastern Sierra Tribal government’s reservations, as defined, currently do not share a common border with the Forest; the aboriginal area of Eastern Sierra Tribes include most of Inyo National Forest. Therefore, the Forest Plan should include language or reference and external document that would provide specifics that local

tribal governments are close enough to be considered " adjacent to the Inyo National Forest" and thus for both the Inyo National Forest and the Tribes be considered eligible to benefit from the provisions under Tribal Forest Protection Act.

Response: The Inyo National Forest lies in the traditional territories of eight federally recognized Native American Tribes, as well as eight unacknowledged Tribes, Tribal groups and organizations. We contact and consult all of these Tribal communities, and consider them important partners in national forest management activities. Desired conditions and other plan components under this heading apply to the Inyo National Forest's recognition that lands and people surrounding the Inyo National Forest have an important influence on national forest management. Amendment of law, such as the Tribal Forest Protection Act (2004), is not within the agency's authority and the plan revision process cannot influence beneficiaries of provisions under this act.

5036

The goals in the draft Sierra National Forest land management plan for the "Cultural Resources," "Geology and Minerals," "Energy" and "Lands" subject areas should be included in the Inyo National Forest plan. This seems like a significant omission. We support the statements made in the Sierra plan and recommend adoption in the Inyo and Sequoia plans.

Response: As requirement of plan revision, the staff at the Inyo National Forest reviewed whether management direction in the existing forest plan is adequate to provide sustainable, integrated resource management; they identified several emphasis areas of management direction potentially needing change (final environmental impact statement, chapter 1). The subject areas of cultural resources, geology and minerals, energy and lands were not identified as a need to change.

Forest plan direction for cultural resources, geology and minerals, and energy and lands can be found in these respective sections of the revised plan: CULT-FW-DC, CULT-FW-OBJ, CULT-FW-GDL; GEO-FW-DC, GEO-FW-STD, GEO-FW-GDL; NRG-FW-DC, NRG-FW-STD, NRG-FW-GDL; and LAND-FW-DC and LAND-FW-GDL.

Some desired conditions for cultural resources (for instance, CULT-FW-DC 01 and CULT-FW-DC 02) cover the theme of the cultural resources goal that is in the draft Sierra National Forest land management plan. Plan direction for geology and minerals, energy, and lands is considered sufficient because all laws, regulations and policies that govern any aspect of forest or land management remain in place and applicable.

5041

Incorporate traditional ecological knowledge.

Response: Traditional ecological knowledge is recognized as a valued part of the process when developing and implementing restoration projects and other forest programs (TRIB-FW-DC-04).

5042

Consult with Tribes with Free, Prior and Informed Consent (FPIC).

Response: The plan includes provisions for consulting and coordinating with Tribal governments, staff and members at all levels (for example, TRIB-FW-DC-01, TRIB-FW-GOAL).

Amendment of law and policy regarding protocols for Tribal consultation is not within the Agency's decision authority in the forest plan.

5043

Support tribal resource programs and tribal employment opportunities.

Response: The plan includes a variety of provisions for supporting Tribal resource programs and employment opportunities (for example, TRIB-FW-DC-05, TRIB-FW-GOAL-02, Potential Management Approaches, LOC-FW-DC-06 and "Tribal Relations" section (final plan, appendix B, Proposed and Possible Actions).

5044

Pizona-Truman Meadows: While Mono County is generally supportive of including this area in recommended wilderness as proposed in alternative C, concerns about access and use by Native Americans in order to protect their heritage should be addressed. We request the Inyo National Forest conduct specific outreach to tribes on this parcel as part of the public outreach process to determine boundaries.

Response: Tribal consultation has occurred throughout the forest plan revision planning process and will continue (record of decision, "Engagement with State and Local Governments, Indian Tribes, other Federal Agencies, and the Public" section and final environmental impact statement, chapter 1, Public Participation). Tribes were provided with information and maps for proposed and recommended wilderness areas prior to release of the environmental impact statement. No concerns relating to the Pizona-Truman Meadows or other recommended wilderness area boundaries have been brought forward by the tribes. Recommended wilderness boundaries could be reconsidered and/or adjusted as appropriate in the event that new Tribal concerns are known, but wilderness designations and boundaries are established by Congressional action.

5045

Cultural Resources: The sections on cultural resource protection and survey work sound good on paper, but how will they be implemented and funded? What are the sources for funding for section 110 project work?

Response: National Historic Preservation Act Section 110 work is typically accomplished through a blend of congressionally appropriated funding and contributions by volunteers. The Inyo forest plan includes an objective to generate 5-10 cultural resource products over the next decade (CULT-FW-OBJ 01). As stated in the 2012 Planning Rule, objectives should be based on reasonably foreseeable budgets (36 CFR section 219.7 (1)(ii)).

5046

Cultural Resources: There needs to be more volunteer opportunities to work with Forest Service professionals. How can Native American folks be more involved?

Response: The plan includes desired future conditions, goals and management strategies that identify a variety of opportunities for Tribal and public participation and collaboration (for example, TRIB-FW-DC-01, TRIB-FW-DC-02, TRIB-FW-DC-03, TRIB-FW-DC-04, TRIB-FW-DC-05, CULT-FW-DC-02, CULT-FW-DC-03, CULT-FW-DC-05, VIPS-FW-GOAL-01, VIPS-FW-GOAL-01, VIPS-FW-GOAL-06, VIPS-FW-GOAL-08, VIPS-FW-GOAL-09, TRIB-FW-GOAL-01, TRIB-FW-GOAL-04). The plan also includes a potential management approach relating to exchange opportunities between Forest Service and Tribal staff (chapter 2, "Tribal Relations and Uses" section).

5047

Cultural Resources: How will site protections be done when off-road vehicle use increases?

Response: The forest plan does not change the Inyo National Forest Motorized Travel Management Record of Decision (USDA 2009). The travel management process analyzed and designated a motorized travel system and included mitigation measures designed to minimize, reduce or eliminate impacts on sensitive cultural resources. Future increased use of the designated motorized travel system by off-road vehicles are not expected to result in impacts to cultural resources that were not already analyzed and taken into account by travel management. The travel management decision prohibits motor vehicle use off the designated system. This prohibition will continue to be enforced to ensure that off-road vehicle use on the Inyo is controlled and directed in order to protect resources in accordance with subpart B of the travel management regulations (36 CFR 212).

5048

The plan direction on cultural resources needs to be revised to strengthen use of partners. The establishment of formal cultural resource partnerships is an important task to complete and Eastern Sierra Interpretive Association recommends including the formation of such partnerships with identified academia with experience in this field. There are many colleges and universities in California and throughout the western U.S. which could bring capacity to help with data collection and preservation of valued cultural resources on the Inyo National Forest. ESIA encourages the Inyo National Forest to consider partnering with identified academia to assist with research, assessment and preservation of cultural resources on the forest.

Response: The final plan does include a plan component under "Volunteers, Interpretation, Partnerships and Stewardship" (VIPS-FW-GOAL-08) that states that we will work with partners, including universities, for cultural resource, "protection, rehabilitation and restoration," as well as, "development of research, educational and interpretive opportunities."

5049

Cultural resources (pp. 41-42) ESIA supports the six (6) forestwide desired conditions identified in this section and would add the following: * ESIA has the capacity for providing interpretive and educational opportunities related to the area's cultural resources. ESIA would like to work collaboratively with the Inyo National Forest, tribal partners and other non-governmental organizations in the region to expand educational opportunities for visitors. This may include the development of improved rotating exhibits, field trips and tours, classes and workshops.

Response: The plan includes direction in relation to interpretation opportunities, which would include working with ESIA on cultural related interpretation and work. This direction is found in the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan, VIPS-FW-DC 02, 03, and 04 and VIPS-FW-GOAL 08 and 09. Although this direction is not specific to ESIA or cultural resources, this direction applies to any activities occurring on the Inyo and would apply to ESIA's interest in working with us to expand educational opportunities to visitors and providing interpretive and educational opportunities in relation to cultural resources.

Travel Management

5050

The PCT Corridor and Wilderness evaluation are new issues brought up after 2005 Travel Management Planning Rule. They must not be allowed to subvert the implementation of the 2005 Rule or in process planning such as the Piute Travel Management Plan. Likewise "in process" plans under the 2005 Travel Management Planning Rule must be completed prior to implementing the subsequent 2012 Forest Planning Rule.

Response: The National Forest Management Act, National Forest Management Act requires the development of land management plans for national forests and grasslands. Forest planning directives (FSH 1909.12 -24) requires plan components for recommended and designated areas such as wilderness or national scenic trails. The decision about what roads to include on the National Forest Transportation System was made in the Inyo National Forest's 2009 Travel Management Record of Decision (R5-MB-198a), and any changes to that system will be made in a project-level decision, not in this Forest Plan Revision.

Facilities and Roads

5060

Include components in plans to assure adequate maintenance and protection of forest recreation programs, facilities and roads in the face of declining funding. Current management is not sustainable and the plans should be revised to recognize this situation.

Response: Included in the plan desired conditions for recreation is DC-FW-REC 03, which says in part "….Recreation activities are ecologically, socially and economically sustainable." This desired condition sets the end state that the Inyo is striving for. Projects during the plan period will be designed to move the Inyo National Forest toward this end state or at least not move away from it.

The Inyo Forest Plan is designed to allow management within sideboards. Although plan components currently do not assure maintenance and programs will occur in any given time frame the plan certainly allows for that and in development of the plan these issues have been considered (See Inyo Assessment pp. 147-148 and Inyo, Sequoia, and Sierra National Forests Need to Change Analysis – Supplement Opportunities p. 20.) Recently funding for recreation and infrastructure maintenance is on the decline. The final environmental impact statement acknowledges that deferred maintenance on developed recreation sites and infrastructure is continuing to outpace budgets in final environmental impact statement, chapter 3, Section "Revision Topic 3: Sustainable Recreation and Designated Areas/Assumptions." The plan includes plan components emphasizing partnerships to help fill in funding gaps (VIPS-FW-DC 02; VIPS-FW-GOAL 04 and 07) and the assumptions section in the final environmental impact statement also addresses that these partnerships may help increase partnership capacity (chapter 3, "Revision Topic 3, Sustainable Recreation and Scenery" section).

See also #061 that addresses facilities and roads.

5061

Plans should emphasize the need for monitoring and enforcement to protect and sustain facilities and roads.

Response: The forest plan monitoring program (chapter 4 of the final plan) includes a monitoring question in regards to trails, both motorized and nonmotorized. This monitoring question refers to the desired condition included in the final plan that states: "The Inyo National Forest provides a range of year-round developed and dispersed recreation settings that offer a variety of motorized and nonmotorized opportunities and recreation experiences" (REC-FW-DC 11). The monitoring question is: To what extent are trails providing access to the activities as intended? With a monitoring indicator of the total miles of motorized and nonmotorized roads and trails and the percentage of miles maintained. Sustaining facilities and roads is addressed in several sections of the plan, including: REC-FW-DC 03, 05, 06, 07, 11; REC-FW-OJB 04; REC-FW-GOAL 03, 12; Inyo National Forest R-FW-DC 01-03; MA-DRA-DC 07, and MA-CBRA-DC 04. All this direction addresses the sustainability of road systems and facilities.

5062

The plan needs to analyze infrastructure and services needs/support the forests will require from the surrounding communities and recognize these needs into plan components.

Response: See 5061 related to infrastructure. In the final environmental impact statement, chapter 3. Economic Conditions Analysis and Methods, it states the following: "Key forest contributions are examined for the geographic areas where economic activities are supported by National Forest System land management. This area represents the counties where forests provide opportunity for production of commodities and forest visitation (such as, timber, range, mining and recreation) and also those counties where forests have made direct expenditures in management (such as spending on projects and Forest Service employee salaries)." The Inyo plan includes plan components that address the foundation resources that affect economic drivers; however, as a Forest Service management plan that regulates the activities of the Forest Service, it cannot directly address community activities and therefore cannot include plan components related to these activities.

5063

The plan should address the issue of increasing usage in the fall and spring shoulder seasons including flexible opening and closing dates for access roads and facilities (for example, restrooms).

Response: The plan provides desired conditions that address year-round recreation opportunities (REC-FW-DC 01), this would include the fall and spring shoulder seasons. The determination of opening and closing roads or other facilities such as restrooms, are not determined at the planning level, but based on local conditions occurring at a site-specific level. Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. Forest plans focus on outcomes and are flexible to allow management to adapt to local conditions. Generally, forest plans are not tactical—they do not specify particular methods that must always be used and do not require resources to be allocated. Forest plans emphasize strategic decisions: "why" and "what," and to a lesser extent, "when" and "where." The "how" decision is generally made at the tactical or project-planning level, and includes a set of site-specific details of time, place, and circumstances related to a particular project proposal (final plan, chapter 1, "Purpose of the Plan" section).

5064

It is imperative that Los Angeles Department of Water and Power retain access to its facilities that are required for the operation and maintenance of the Los Angeles Aqueduct and Power Systems and any potential impacts to resources on city of Los Angele property are avoided. These facilities include but are not limited to: hydrographic measuring stations, dams, weirs, pipeline intake structures, irrigation diversion structures, power plant penstock facilities, communications radio repeaters and high voltage transmission lines.

Response: Access to Los Angeles Department of Water and Power facilities is not prohibited or restricted in the Inyo Revised Plan. Access by special use permittees was determined in the 2009 Travel Management Decision (Record of Decision, Motorized Travel Management, 2009), which is being carried forward under the revised plan.

5065

The plan should incorporate standards and guidelines for potential energy corridors, including requirements for compatibility with scenic integrity objectives and ecological integrity within the limits of other laws.

Response: Energy uses on the Inyo National Forest were not identified in the June 2014 Updated Need for Change. This resulted in the plan direction from the 1988 Land and Resource Management Plan to be brought forward into the final plan. Direction for energy includes a desired condition (NRG-FW-DC 01) and a standard (NRG-FW-STD 01). Although the plan does not specifically call out energy corridors in the Scenery section of the plan, these plan components would apply to any new energy corridor proposed on the Inyo National Forest. This scenery direction states that, scenic character is maintained and/or adapted to changing conditions to support ecological, social, and economic sustainability on the Inyo and in surrounding communities (SCEN-FW-DC 02) and that scenic integrity is maintained in places people visit for high quality viewing experiences (SCEN-FW-DC 03). These plan components would be applied to any activity on the Inyo.

5066

The plan should include desired conditions and goals related to enhancing the means of providing focused visitor education and interpretation so that all visitors better understand how to act responsibly when using Forest infrastructure.

Response: The Inyo plan includes many areas that address visitor education and its connection to responsible visitor use. Here are some examples. The Inyo's "Distinctive Roles and Contributions of the Plan Area" section in the plan is in alignment with the proposal as it states "Conservation education and interpretation programs focus on developing a land ethic as part of the recreation experience." Further the Inyo National Forest's niche statement also emphasizes using education to encourage responsible recreation use of the national forest. "Conservation education and interpretation focus on developing a land ethic as part of the recreation experience." The Inyo plan currently includes several desired conditions that address visitor education leading to responsible visitor use of the national forest including:

FIRE-FW-DC 07 addresses education benefiting the reduction of human ignited wildfire.

LOC-FW-DC 05 addresses using education to connect people with nature. This connection is hoped to produce caring for the environment.

VIPS-FW-DC 03, 06 and 07 address education and responsible recreation use, reduction of litter and preservation of cultural sites.

TRIB-FW-DC 05 focuses on Tribal youth and developing land stewardship.

CULT-FW-DC 03 emphasizes using cultural resources education to connect people to the land with the hoped outcome of more responsible use.

MA-REC3-DC 06 addresses management of the wilderness through educational Forest Service contacts.

Pacific Crest Trail management approach, which uses education to manage the Pacific Crest Trail.

VIPS-FW-GOALs 06 and 08 address working with partners to foster education on a variety of topics.

Cultural resources management approach that seeks to use visitor education as a method of cultural site protection.

We agree that education is a good tool to ensure responsible use and good management of the Inyo National Forest and help connect the public with their land.

5067

The plan should include desired conditions and goals related to establishing appropriate "adopt a facility" programs with a focus on improving facilities to enhance experiences, to connect people to the landscape, and to educate visitors to embrace the concepts of individual and organizational stewardship.

Response: As explained in the final environmental impact statement, chapter 1, Purpose of a Plan: “Forest plans focus on outcomes, and are flexible to allow management to adapt to local conditions. Generally, forest plans are not tactical and do not specify particular methods that must always be used and do not require resources to be allocated. Forest plans emphasize strategic decisions: ‘why’ and ‘what,’ and to a lesser extent, ‘when’ and ‘where.’ The ‘how’ decision is generally made at the tactical or project planning level, and includes a set of site specific details of time, place and circumstances of a particular project proposal.” Although Forests commonly utilize the concept of adoption of trails and other infrastructure and utilizing partners is emphasized in the plan (REC-FW-GOAL 05 and 10) determining how to achieve plan goals is appropriate at project level planning.

5068

The plan should include desired conditions and goals related to implementing community based "adopt a facility" programs with the goal to address up to 25 percent of the deferred maintenance for basic user facilities such as restrooms, trails, signage, and historical facilities.

Response: See 5067 addressing plan components and adopt a facility programs. See 5060 and 5061 addressing deferred maintenance.

5069

The forest plan should provide components for the decommissioning of roads. We urge that the hydrologist and perhaps the forest engineer examine the roads to see if measures should be taken to avoid concentration of runoff, perhaps the removal of

certain culverts or recontouring sections of the roadbeds could mitigate the likelihood of sediment loss and impacts to the watershed caused by these unmaintained roads. Also, seeding with native local ecotypes of shrubs and grasses to limit weed spread and provide greater habitat security.

Response: Plan components that address any activity on a road, including decommissioning, is found within the "Watershed and Riparian Conservation Area" section of the plan (WTR-FW-STD 01; MA-RCA-STD 01, 04, 07, and 10; and MA-RCA-GDL 02). This direction is applied when specific projects occur on the Inyo National Forest, such as decommissioning a road. The determination of which roads to decommission and restoration efforts needed would occur at the project-level and are informed by the Inyo's Travel Analysis Report developed under the Travel Management Rule, subpart A, local conditions and resource issues.

The plan includes language addressing the need use, when possible, plant and seed materials that are native, genetically appropriate to the site, and capable of becoming established to restore natural species composition and ecosystem function (INV-FW-GDL 03).

5070

This area and the Inyo National Forest has the unique condition of having a large number of "historic wagon roads," These linier archeological resources are not "unauthorized roads." They pre-existed the Forest Service and Inyo National Forest. All roads pre-dating the Forest Service should be protected in the forest plans, not tilled up.

Response: Historic features, such as historic wagon roads, are considered under the National Historic Preservation Act of 1966 (Public Law 89-655, October 15, 1966) and the forest plan is in compliance with this law. The plan also includes a desired condition that addresses the preservation and protection of cultural resources (CULT-FW-DC-01). Under the Inyo National Forest Motorized Travel Management decision, motorized uses are not authorized along these roads (USDA, ROD Motorized Travel Management, 2009). This decision did not prohibit mechanized travel along these routes. During project-planning, our staff would address any closures needed along these routes and provide an effects analysis on any historic or prehistoric issues before determining how to close these areas.

5071

As a means to provide a full range of sustainable recreation opportunity, the Forest Service should look at adding some of the unauthorized roads into the forest's road system to be used for access to additional semi-primitive-motorized recreation opportunities. The semi-primitive-motorized designation also provides protection as it calls for an area to be characterized by a predominantly natural-appearing environment with minimal on site controls.

Response: The Inyo has previously gone through travel management process (2009 ROD) to review inclusion of unauthorized routes into the National Forest Transportation System. Information on that decision can be found at http://data.ecosystem-management.org/nepaweb/nepa_project_exp.php?project=17479.

The forest planning process is a high-level process designed to make decisions to serve as side boards to management and not designed to make site specific decisions requiring a different level of analysis that are needed to make decisions on specific routes. See final environmental impact statement section on forest plan content that discusses forest plans and their function.

The final plan includes direction for sustainable recreation management areas, of which there is direction in the challenging, backroad recreation area, which includes semi-primitive motorized recreation opportunities. This plan direction establishes desired condition that state: Landscapes [within this area] provide opportunities for challenging and remote recreation experiences (MA-CBRA-DC 01) and that these areas contribute to ecosystem and species diversity and sustainability (MA-CBRA-DC 02).

5072

Plans need to include direction on identifying or achieving a minimum road system, removing unneeded system roads, or otherwise promoting sustainable transportation infrastructure that helps maintain and restore ecological integrity. Moreover, current plan direction does not address the role of climate change, which likely will be dominant in road management decision-making over the life of the revised plans. This needs to be included.

Response: See response to comment 5071 that addresses the nexus between plan revision and travel management.

The final plan did include direction to guide future decisions on road management and sustainable infrastructure, such as REC-FW-GOAL-12, "Manage infrastructure to meet the minimum needs of the associated use and the annual maintenance capabilities of the forest"; and REC-FW-GLD-04, "Use integrated resource planning during projects to address impacts to at-risk species habitat and changing conditions in recreation settings."

The final plan is not designed to address achieving a minimum road system, removing unneeded system roads or promoting a sustainable transportation system while maintaining ecological integrity. The travel analysis process is required by the 2005 Travel Management Rule so that forests provide a safe, financially, and environmentally sustainable road system that can realistically be maintained.

Travel analysis and forest plan revision are separate regulations and are not interdependent; however, the travel analysis process should be consistent with the direction in the forest plan. We produced a Travel Analysis Report in November 2016.

The final plan acknowledges that future road repair decisions will need to consider climate change in MA-RCA-STD-05, which states, "All new or permanent stream crossings shall accommodate at least the 100-year flood and its bedload and debris. 100-year flood estimates will reflect the best available science regarding potential effects of climate change." Climate change is also included throughout the plan in components regarding ecosystems and species. Road maintenance will need to follow direction regarding protection of ecosystem and species. Further, appendix B of the plan includes the following in the "Sustainable Recreation" section, "Collaborate…to restore, maintain and enhance recreation settings impacted by climate change..", showing that the effects of climate change on future recreational use and facilities was considered in the plan and will inform future management.

5073

The environmental impact statement does not adequately address roads within the riparian conservation area, both existing road system, road density, or permanent or

temporary roads required to perform vegetation management at increased pace and scale as proposed (alternative B).

Response: See response 6160 (This is a duplicate).

Geology, Mining, Minerals and Energy

5074

The draft plans do not recognize the mission of the Forest Service or the various laws that govern and authorize the Forest Service in the production of mineral and energy resources. These aspects need to be incorporated into the draft plans.

The mission of the Forest Service is "To sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." The plan developed based on the preferred alternative accomplishes this through development of plan components for all resources and values.

A forest plan guides and constrains the actions of Forest Service personnel, not the public. Any constraint on the public can only be imposed by law and regulation, or through an order issued by a Forest Service responsible official (policy). All laws, regulations, and policies that govern any aspect of forest or land management remain in place and applicable; the Inyo's plan does not invalidate them despite their not being included specifically within the plan. The Inyo does not include the vast amount of other regulation that addresses aspects of forest management within the plan. See final environmental impact statement "Regulatory Direction" section for further explanation on the decision not to include existing law, regulation or policy.

5075

The vision for geology and minerals in the draft plans must include a statement recognizing Forest Service minerals policy and the mandate of the Strategic Minerals Law.

See response to comment 5074.

5076

The plans should include components that prohibit the installation of industrial solar and wind facilities.

The Need for Change Supplemental document for "Wind Energy" and "Solar Power" concluded that wind energy and solar power development is supported by existing law, regulation and policy. The plan states that any energy developments would need to be determined to be in the public interest, but there is a desired condition, NRG-FW-DC-01 that, "Energy resources of National Forest System lands provide for the maximum public benefit that is compatible with protecting ecosystem integrity" (final plan, chapter 2, "Energy" section). Any energy development must be consistent with all provisions of this plan that address protection of ecosystems and species.

5077

The draft plans should include standards and guidelines for potential energy corridors, including requirements for compatibility with scenic integrity objectives and ecological integrity within the limits of other laws.

The Need for Change Supplemental document for "transmission corridors" concluded that current direction provides for sufficient management of transmission corridors. The Inyo's previous plan direction regarding undergrounding utility lines was brought forward into the final plan (LAND-FW- GDL-02).

SCEN-FW-DC 05 addresses meeting scenic integrity objectives (SIOs) within the built environment, which would include transmission lines.

5078

Geology and Minerals; forestwide 01: We suggest a change to clarify this direction (suggested changes in italics): "Mineral resources on National Forest System lands are developed to the extent that they provide for *overall maximum long term* public benefit *from those lands*, while minimizing adverse environmental effects on other forest resources from mineral exploration, development and extraction."

Response: Minerals or mining resources was determined not to be a need for change area in the Need for Change Supplement: "Current management direction is sufficient to appropriately manage active mining claims. Abandoned mine lands are being reclaimed as resources allow." (p. 22). Therefore, language from the Inyo National Forest's existing plan was brought forward as close to the original language as possible while conforming to 2012 Planning Rule requirements, with plan components GEO-FW-DC-01 and GEO-FW-STD 01 through 04. The Inyo has chosen to follow a consistent process and not make language revision to these components.

5079

Energy; In the introductory statement, the following wording is found: "Wind and solar development is limited on the forest." This statement is so vague as to be meaningless. This vision statement needs to be more clear and meaningful. Alternative language to consider would be: "Wind and solar development are limited to areas of the forest where the public value of significant ecological, cultural, recreation and scenery resources will not be impaired."

Response: Although the introductory statement referred to by the commenter is in the "Vision" section this introductory statement is only intended to introduce the topic and to provide some context for the following desired conditions. The "Vision" section refers to the desired conditions that are the plan components being presented. The Inyo plan has been restructured to align resource area plan components to make it easier to see how the plan components work together to help forest management actions move toward the desired conditions. The introductory statement language suggested reads like a standard or guideline rather than contextual language. See response to comment 5076 for an explanation of why additional plan components are not being considered for wind and solar energy.

5080

Vision, Energy; forestwide 01: The current wording of this statement indicated that only ecosystem integrity would be considered in limiting energy resource development. This direction is unacceptable. We suggest the following language: "Energy resources of National Forest System lands provide for the maximum benefit from all public

resources and is compatible with ecosystem integrity, and significant cultural, recreational and scenery values."

Response: Any energy development must be consistent with all provisions of this plan that address protection of cultural, recreational and scenery values, as well as ecosystem, social, and economic resources. We used the existing language about energy development from the previous plan. Because all future projects will need to meet plan components, we did not need to add protection of every possible resource impact to each plan component.

5081

Geology and Minerals, forestwide; Pacific Crest Trail Association recommends that all three plans contain the same guidelines. While these guidelines share some of the same direction, there is not uniformity and we do not understand why this is the case. (01 and 02) These guidelines are consistent from plan to plan. PCTA supports these guidelines as written and would object to them being deleted or substantially altered in the final plan.

Response: See response to comment 5078 and 5083.

5082

Geology and Minerals, Forestwide; 03 PCTA believes that the term "special areas" used here is an artifact of old terminology and should be changed (in the Sequoia plan) to "designated areas" as used in these plans. This would include wild and scenic river corridors. We think that this guideline, unique to the Sequoia, should be adopted in the other two plans (Inyo and Sierra plans). We support this direction as edited, and would object to its deletion in the final Sequoia plan or it not being adopted in the other two plans.

Response: See response to comment 5074 and 2078.

Mineral withdrawal is governed by other laws, regulations and policy. According to the 2012 Planning Rule, “Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2).” As it is not the intent of the Plan to reiterate existing law regulation or policy, the Sequoia guideline (GEO-FW-GDL 03) “Consider mineral withdrawal subject to existing claims in special areas and wild and scenic river corridors”, is not needed. Additionally, wild and scenic river corridors including those that have been found eligible for designation protect the Outstandingly Remarkable Values of the rivers. Existing law, regulation and policy also exist for these corridors that are not reiterated within the plans but still are in force providing protection beyond that which is specified in the plan. See final environmental impact statement, “Regulatory Direction” section for further explanation on the decision not to include existing law, regulation or policy.

5083

Inyo National Forest Geology and Minerals; PCTA supports the request of withdrawal from mineral entry (subject to valid existing rights) as it appears on both the Sequoia and Sierra plans and requests its addition to the Inyo plan.

Response: The Inyo’s revised forest plan includes plan components that address geology and mineral exploration and development for areas along the Pacific Crest Trail that are located outside of wilderness (MA-PCT-STD 03 and MA-PCT-SUIT 03). These are identical to those found in the draft revised plan for the Sequoia National Forest (USDA Draft Revised Land

Management Plan for the Sequoia National Forest, 2016) and Sierra National Forest (USDA Draft Revised Land Management Plan for the Sierra National Forest, 2016).

5084

All Plans; Geology and Minerals; We support the "rehabilitation" bullet point in the three plans with the suggestion it read: *"Rehabilitate abandoned mine lands and mineral operations sites that are no longer in use."*

Response: See response to comment 5078 and 5083.

5085

Sequoia and Inyo Plans; Cultural Resources, Geology and Minerals, Energy and Lands; The four goal subject areas listed above are only addressed in the Sierra Plan. This seems like a significant omission. PCTA generally supports the statements made in the Sierra plan and recommends adoption in the Inyo and Sequoia plans.

Response: See response to comment 5036

Lands and Special Uses

5086

The draft plans need to better address the issue of excessive permitting requirements for special uses (such as grazing) and establishing partnership agreements. The resulting red tape and delays of permitting result in decreased contributions from these activities.

Response: The Inyo plan in alignment with the 2012 Planning Rule seeks to develop ecological, economic and social sustainability. The included plan components have been designed to balance needs of various resources and the needs of the American people while providing ecosystem services (including grazing, hydropower, recreation and other ecosystem services that are provided under permit). Plans are not designed to develop specific permitting processes but rather to set sideboards on forest management to achieve this balance.

The plan addresses special uses specifically in the following ways:

MA-RCA-STD 04 & 07 include exemptions to following a standard for areas under special use (SU) permit. Existing SUs are allowable in wilderness.

The plan also addresses adequacy of instream flows (WTR-FW-STD 03), conservation of at-risk species (Potential Management Approaches within Animal and Plant Species section), weed prevention (INV-FW-GDL 04), historic property protection (CULT-FW-STD 01), and prevention from degrading water quality (MA-RCA-STD 03 and MA-RCA-GDL 02) when issuing a special uses permit.

See response to comment 4129 related to the Inyo Plan and partnerships.

5087

The draft plans need to clarify language that seems to restrict current locations for film permitting opportunities. Location specific references should be removed.

Response: There is no longer any reference to filming in the revised plan; the draft plan approach of having defined “places” was replaced with a different approach to recreation management.

5088

The draft plans should add components to more effectively restrict special use permits and enact effective constraints with the goal of eliminating and reducing impacts to protect terrestrial and aquatic ecosystems. Specifically, there need to be desired conditions, objectives, management areas, standards, guidelines or suitability determinations that set forth measurable criteria for holding the Forest Service accountable when the agency grants or renews permits and other authorizations (examples of this language are provided).

Response: See response to comment 5086. Although the plan may not include language that specifically restricts special uses permits in ways suggested, management must move the national forest toward desired conditions or at least not move away from the desired conditions. There are many desired conditions related to resilient and healthy terrestrial and aquatic ecosystems (final plan, chapter 2, "Terrestrial Ecosystem and Vegetation" section, "Watershed" section, and chapter 3, "Riparian Conservation Areas" section). These desired conditions will be considered as well as all other plan language upon consideration of issuing special uses permits as well as all other existing law regulation and policy relating to special uses permit issuance. National Forest Management Act requires that the Forest Service manage the national forest in compliance with the forest plan. It is our intent to comply.

5089

The draft plans should implement recommendations of the Office of Inspector General for cooperative agreements and other actions to bolster the effectiveness of right of way and easement programs. These actions will bolster the Forest Service's oversight and effectiveness in protecting national forest resources from harmful activities on adjacent state and private lands.

Response: As requirement of plan revision, the staff at the Inyo National Forest reviewed whether management direction in the existing forest plan is adequate to provide sustainable, integrated resource management; they identified several emphasis areas of management direction potentially needing change (final environmental impact statement, chapter 1). The subject area of lands was not identified as a need to change. The "Lands" section of the Inyo Assessment document indicates that easements and right of way issues are not a key issue for the Inyo National Forest.

Protection of natural resources on the Inyo National Forest is addressed through many plan components including detailed desired conditions that will influence decisionmaking.

Right of way creation is addressed in LAND-FW-GDL 02. There is a potential management approach that addresses right-of-ways no longer in use in the sage-grouse section in chapter 2 of the forest plan.

All laws, regulations, and policies that govern any aspect of forest or land management remain in place and applicable; Inyo's revised plan does not include these specifically within the plan.

5090

The plans should include language that establishes a broader vision when it comes to user permits and interfacing with more and different community and nonprofit organizations.

Response: See response to comment 4130 relating to our perspective on partnership development, which is very closely related to interfacing with more and different community and non-profit organizations.

See response to comments 5086 and 5088 relating to special use permits.

5091

The draft plans need to add language that places more priority on the recreation special uses program to expand recreational opportunities, services and facilities to meet the needs of the public and to promote outdoor recreation as directed in the Multiple Use Sustained Yield Act of 1960.

Response: As evidenced by the "Distinctive Roles and Contributions of the Plan Area" section in the Inyo Plan, the Inyo values and supports outdoor recreation with an existing robust recreation infrastructure supported by special uses. The final environmental impact statement recognizes the increasing population growth resulting in more recreation demand. See response to comment 8383 that addresses this challenge and the corresponding challenge that the Inyo faces in addressing it.

It should be noted that the plan reflects only one of the alternatives considered in the environmental impact statement from which the Inyo forest supervisor could select. These alternatives had different approaches to recreation as this was a key issue for the revision. After consideration of the public feedback received, we developed a recreation approach that is sustainable and meets recreation needs to the extent possible considering forest capability, budgets and partnership opportunities.

5092

The current draft plans call for transmission lines to be buried when feasible. This language should be removed because buried lines are likely to have greater long term habitat disturbance.

Response: See response to comment 5077 related to the plan approach to transmission lines and corridors. Additionally, forest plans are strategic in nature and do not address site specific activities or their effects. Project-level planning would be necessary to determine the amount and type of transmission line burial in an area on the Inyo National Forest.

5093

The current language in the draft plan on filming permits is subjective, allows for abuse of the rules, and invites potential discrimination. Filming opportunities should be afforded based solely on objective bases: whether the applicant has the technical, financial and operational capability to carry out the filming opportunities, and whether the applicant agrees to follow the terms of the filming authorization.

Response: See response to comment 5087.

5094

The absence of any publicly accessible database of binding forest orders renders the entire draft plan uncertain. How can the public fairly understand the impact of changes to the current forest plan without understanding how the new plan will impact currently enforceable forest orders?

The draft plan should expressly list all active forest orders, when the forest orders were enacted, what sort of environmental or procedural review the forest orders underwent, whether the forest orders have a stated date of expiration, and if so when that expiration will occur.

The plan should directly address whether each enacted forest order remains necessary should the preferred alternative be adopted, as well as whether each applicable forest order is consistent with the draft plan, how it is consistent or inconsistent, and whether the forest intends to seek to change the forest order in light of the draft plan.

Response: The Inyo does not include the vast amount of law, regulation, and policy that addresses aspects of forest management. A forest plan guides and constrains the actions of Forest Service personnel, not the public. Any constraint on the public can only be imposed by law and regulation, or through an order issued by a Forest Service responsible official (policy). All laws, regulations, and policies that govern any aspect of forest or land management remain in place and applicable; Inyo's revised plan does not invalidate them despite their not being included specifically within the plan. See final environmental impact statement section regulatory direction for further explanation on the decision not to include existing law, regulation, or policy.

5095

Energy Projects.

The forest plan needs to include components limiting commercial-scale wind and solar energy projects on Inyo National Forest lands within Mono County. Also, standards and guidelines for potential energy corridors need to be included in the Inyo National Forest Forest Plan ensuring any future powerline or pipeline construction is compatible with the scenic integrity objectives of the Inyo National Forest and Mono County.

Response: The revised plan includes plan components addressing scenic integrity objectives, including powerline or pipeline construction, which is a permitted use on Inyo National Forest (SCEN-FW-DC 02 and SCEN-FW-GDL 01).

See response to comments 5065, 5076, and 5077.

5096

Lands.

The Inyo National Forest should include a statement in the draft plan committing to early engagement of the communities in landownership adjustment efforts. This was a recommendation in the Eastern Sierra Landownership Adjustment Project, of which the Inyo National Forest was an interagency participant.

Response: The revised plan has a desired condition (LAND-FW-DC 02) that allows for the coordination of land and resource planning efforts to continue with other local governments. This coordination would include any current memorandum of understanding that has been signed by Inyo National Forest personnel. The revised plan does not preclude or prohibit the continuance of these signed agreements.

5097

Lands.

Specific plan edits/modifications. Lands, p. 44 (plan), merge into 01 as part of last sentence, "...and also allow communities/counties to achieve their management objectives by preventing development of isolated private parcels (or something similar).

Response: Plan components for lands were not identified as a need for change for the Inyo National Forest (USDA, Inyo, Sequoia, and Sierra National Forests Need to Change Analysis-Supplement, June 2014). Given that this resource area was not identified as needing to change, the plan direction from the 1988 Land and Resource Management Plan was carried forward into the final plan.

5098

Sequoia and Inyo Plans; Cultural Resources, Geology and Minerals, Energy and Lands; The four goal subject areas listed above are only addressed in the Sierra Plan. This seems like a significant omission. PCTA generally supports the statements made in the Sierra plan and recommends adoption in the Inyo and Sequoia plans.

Response: See response to comment 5036.

Inventoried Roadless Areas

5101

I support alternative C with some adjustments to the inventoried roadless areas to allow for setbacks from roads and the like in line with recommendations from the Friends of the Inyo and the Sierra Club and with no logging or salvage logging other than for limited stated purposes.

Response: See response 8220 and 5112.

In addition, the proposed recommended wilderness boundaries in alternative C have been adjusted to allow a 200-foot buffer on either side of the centerline of roads adjacent to these areas (final environmental impact statement, volume 2, appendix B, “Process Used to Evaluate Areas that may be Suitable for Inclusion in the National Wilderness Preservation System, Cherry Stem Roads” section). Inventoried Roadless Areas boundaries were determined under the 2001 Roadless Area Conservation Rule (36 CFR Part 294) and we do not have the authority to adjust these boundaries.

5102

We are also concerned about the protection and management of roadless areas on the forest. As we addressed in our recreation comments, these roadless areas need to be classified as semi-primitive non-motorized or primitive to allow for human powered recreation that may be prohibited in wilderness. There needs to be high quality non-motorized recreational opportunities as well as resource protection in roadless areas that may not qualify, or be brought forward for other reasons, as recommended wilderness.

Response: In consideration of this comment, inventoried roadless areas are considered in the challenging, backroad recreation area. This management area includes primitive, semi-primitive non-motorized and semi-primitive motorized recreation opportunity spectrum classes, as

authorized roads do occur in these areas. Plan direction for this area includes desired conditions for the contribution of these areas to provide for ecosystem and species diversity and sustainability (MA-CBRA-DC 02), low density of infrastructure and designated roads and trails (MA-CBRA-DC 04) and offering vast areas for non-motorized cross-country travel (MA-CBRA-DC 06).

5103

Consider inventoried roadless areas not recommended as wilderness for designation as a special management area.

Response: See response to comment 8220 that addresses the Roadless Rule and protections for inventoried roadless areas. The Inyo has considered this suggestion and determined that the protections under the Roadless Rule are adequate and a new management area is not necessary to maintain the roadless character or the unique recreational opportunities of these areas.

See also response to comment 5111 related to the interaction of the plan with inventoried roadless areas.

5104

Roadless areas should be wilderness in order to protect the recreational opportunities as well as the resources in these areas.

Response: See response to comment 8220 and 5013 that address inventoried roadless areas and the protection of these areas.

5105

The draft plans need to better specify how our remaining roadless areas will be managed to protect their wild and non-motorized character, protect wildland ecosystems and sustain the social benefits they provide.

Response: See response to comment 8220 that addresses roadless area regulation.

5106

There is an error in plan text that needs to be fixed: Page 82 - the Secretary of Agriculture did not "designate" inventoried roadless areas. Rather, the Forest Service developed and produced the "inventory" of Roadless Areas.

Response: The language in the introduction to the “Inventoried Roadless Areas” section of the plan has been adjusted to reflect the development of the roadless inventory.

5107

Inventoried roadless areas that were not designated for additional protections under wilderness should be considered for other protections (such as NRAs).

Response: Please see response 5103 that address inventoried roadless areas and the protection of these areas including making them management areas.

5108

Remaining roadless areas should be managed as primitive or semi-primitive non-motorized areas.

Response: See response 5102.

5109

The lack of management for inventoried roadless areas is a violation of NEPA and the 2012 planning rule.

Response: See response 5102 and 8220.

5111

Inyo National Forest (strengthen the draft Inyo Forest Plan) Additional protections are needed to manage all our remaining roadless areas to protect their wild, non-motorized character.

Response: The Inyo revised plan complies with the 2001 Special Areas; Roadless Area Conservation; Final Rule (Roadless Rule) (36 CFR Part 294, 2001). Desired conditions in the challenging, backroad recreation management area, where inventoried roadless areas are found, address the need to "Retain the low density of infrastructure and designated roads and trails" (REC-MA-DC 04).

Range, Meadow, and Aquatic Resources

Range and Grazing

6000

Some best available science concerning the impacts of grazing is not addressed, including: recent data on livestock grazed range that would show the condition and resilience of the range in the face of current drought conditions and climate change, Beschta et al. 2012 and 2014, Interior Columbia Basin Ecosystem Sciences, Wisdom et al. (2002), Connelly et al. 2004, Knick and Connelly 2009/2011, Dobkin and Sauder 2004, Belsky and Gelbard (2000), and Comer et al. Great Basin Rapid Ecological Assessment.

Response: We reviewed the public comments and the literature provided. The literature referenced suggests that adaptive management is needed to reduce anthropogenic stressors, such as livestock grazing, to provide for resilient terrestrial and aquatic ecosystems, particularly in sage steppe habitats important to sage grouse. After considering this information, additional direction has been added in the bi-state sage grouse section. The draft environmental impact statement incorporated risk factors such as invasive weeds and climate change into the final environmental impact statement analysis in chapter 3 in the following sections: "Terrestrial Ecosystems," "Aquatic and Riparian Ecosystems," "Bi-State Sage Grouse," "Rangeland Livestock Grazing." Analysis, inventory and monitoring protocols for rangelands will be moved into an Inyo Supplemental Rangeland Analysis Guide.

6001

The draft environmental impact statement has simply ignored livestock grazing as a system driver/change agent/stressor at all. There is inadequate analysis.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Forest Benefits to People and Communities, "Production Livestock Grazing" section.

6002

We are disappointed to see management direction carried forward almost verbatim from previous forest plans and amendments, including the Sierra Nevada Forest Plan,

without regard for new information or best available science related to forage utilization.

Response: We determined rangeland management and production grazing management direction did not need to change for several reasons: 1) grazing direction had been covered by recent plan amendments (2004 Sierra Nevada Forest Plan Amendment); 2) the Inyo National Forest Assessment (2012) indicated the current management appears to be moving toward desired conditions; and 3) effectiveness monitoring of grazing direction is still being assembled (UC Davis Rangeland Watershed Laboratory) therefore science is not "ripe" to make range a topic for need to change current grazing direction. See section on "Effectiveness of Current Grazing Direction and Information Gaps" in chapter 3 of the final environmental impact statement.

Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6003

The desired conditions, standards, and the monitoring indicators should all reflect the same terminology.

Response: The terminology used in the Inyo forest plan for the desired conditions, standards, and the monitoring indicators is consistent with the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6004

The proposed plans have relaxed protective standards compared to the current plans with respect to grazing, making it likely that grazing will have more adverse impacts; therefore, adopt the current standards into the proposed plans and include some additional standards based on best available science.

Response: In certain instances, standards from the current plans were changed to guidelines in the revised plan. Resource protection will not be affected. Under the 2012 planning rule, a standard is "a mandatory constraint on project and activity decision making, established to help achieve or maintain the desired condition…" A guideline is also a constraint; the difference is a guideline allows for departure from its terms, as long as the purpose is met. The rationale for the change is based on the variable ways to achieve the purpose. Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6005

If Sierra Nevada Forest Plan Amendment standard and guidelines 120 and 121 are eliminated, then the Forest Service must analyze the effects of livestock grazing on all sensitive riparian resources. It must explain what will be used to determine allowable

grazing utilization levels on meadows and riparian vegetation in the three national forests if these standard and guidelines are eliminated.

[NOTE: 2004 standards and guidelines 120 and 121 are retained in total, just separated out as MA-RCA-STD 14-17, GDL-8 and one PMA].

Response: The Inyo has been using utilization standards from amendment 6 (1995) that are comparable to Sierra Nevada Forest Plan Amendment standards and guidelines 120. The final plan standards and guidelines for riparian shrub browse are based on previous standard 121.

6006

Retain standards and guidelines 120 with modifications – eliminate the sentence concerning intensive grazing systems that allow higher-than-40 percent utilization rates to be established on meadows in late seral status.

Response: See response to comment 6005.

6007

Retain standards and guidelines 121 on all three forests. The elimination of standards and guidelines 121 would also limit the ability of Forest Service officers and citizens to facilitate the timely removal of livestock from an area when willow utilization indicates a change in livestock preference from herbaceous to woody browse. Proposed changes to livestock utilization of willow in these classes should be made more restrictive, given the ecological instability that will likely be generated by global warming. The U.S. Forest Service has provided no compelling reason for proposing a change that seriously threatens the healthiest remaining segment of willow vegetation and habitat in the southern Sierra Nevada by eliminating standards and guidelines 121.

Response: See response to comment 6005.

6008

Clarify if amendment 6 on the Inyo National Forest still applies and if it replaces standards and guidelines 120 and 121. Also, clarify when amendment 6 was approved.

Response: Amendment 6 was approved in 1995; it has been incorporated into the final forest plan and updated to meet the new planning rule guidelines. Also see response to comment 6005.

6009

All plans including the Inyo should be modified to comply with those utilization standards and legal language currently included in Sierra Nevada Forest Plan Amendment standards and guidelines 120 and 121 that are more restrictive than those delineated in the Inyo National Forest Land and Resource Management Plan, amendment 6.

Response: See response to comment 6005.

6011

The amendment 6 riparian vegetation watershed protocol requires an excessively demanding combined number of degraded and/or non-functional ratings to trigger a mandatory livestock removal action. In contrast, Sierra Nevada Forest Plan Amendment standards and guidelines 120 does not appear to require non-functional watershed

ratings in order to trigger mandatory livestock removal, and should be included instead.

Response: The Inyo has been using utilization standards from amendment 6 (1995) that are comparable to Sierra Nevada Forest Plan Amendment standards and guidelines 120. The Inyo rangeland assessment is comparable to assessments that would be required under Sierra Nevada Forest Plan Amendment standard and guideline 120 to remove livestock.

6012

The draft plans allow management to continue to adversely affect meadows and special aquatic features that are not properly functioning (allowing continued utilization when the condition is trending towards properly functioning but not actually properly functioning) whereas the existing forest plans require that these features be properly functioning (standard and guideline 117). By comparison, the draft plans allow for meadows and other special aquatic features to be not properly functioning as long as it is trending toward this condition. Plan components should be developed that are not less stringent than current related to meadow and aquatic feature protection. Remove the phrase "or at functioning at-risk and trending toward proper functioning condition" from MA-RCA-STD 11.

Response: The original intent of Sierra Nevada Forest Plan Amendment standard and guideline 117 was not to remove livestock grazing if the site was not at proper functioning condition. The Inyo clarified livestock management associated with hydrologic function of riparian areas and meadows functioning at risk in the final forest plan in MA-RCA-STD-12 and MA-RCA-STD-13.

6013

Apply much more conservative and required measurable mandatory limits on livestock use as triggers for livestock removal from land areas being grazed coupled with avoidance of any grazing/trailing disturbance during sensitive periods of the year - including during nesting, brooding, birthing, young rearing and wintering periods and includes both riparian areas and uplands. No grazing should be allowed in big game and other important habitat during winter periods, to prevent stress, disturbance and displacement.

Response: Term grazing permits allow for modification of the number, kind, and class of livestock, period of use, and grazing allotment specified in the permit when determined by the Inyo National Forest officer in charge to be needed for resource protection (term grazing permit, part 2, clause 8(b)). Additional guidelines have been added that require further adjustment of grazing utilization or disturbance levels when needed to obtain properly functioning riparian conservation areas. Limited operating periods or avoidance to specific wildlife species are identified at the project-level during environmental analysis for sage grouse breeding (SPEC-SG-STD 06) and nesting (SPEC-SG-STD 07) habitats. Livestock use is adjusted on key deer winter range (RANG-FW-STD 06).

6014

If standards are exceeded in any year, penalties should be applied such as livestock reductions in numbers, with reductions of 25-50 percent for each violation along with more herding and other requirements. If standards are exceeded in multiple years during the term of the permit, livestock grazing must be ended in the pasture.

Response: This issue is not appropriately addressed at the land management planning level. The Region 5 Interim Directive No. 2209.13-2009-1 supplement to Forest Service Handbook 2209.13,

chapter 10, 16.2 Suspension and Cancellation Guidelines, provides direction on non-compliance with the terms and conditions of the grazing permit.

6015

For any lands that continue to be grazed: The use levels that must be applied must leave 9 inches of residual native grass cover across native understory communities. It must be based on valid monitoring sites that are used to a considerable degree by livestock.

Response: The analysis and planning guide, Region 5-EM-TP-004, provides the methodology to determine the vegetation conditions for which the utilization standards are established. The final forest plan outlines utilization standards for different vegetation types in RANG-FW-STD. Monitoring sites are based on the key area concept, identified in Region 5–EM-TP-004 where the sites chosen for monitoring utilization are those that receive more focused use by livestock because the more desirable forage species occur there.

6016

Only one grazing disturbance bout (including trailing) can be allowed annually in a land area. Multiple and repeated use periods are harmful to sage-grouse, native vegetation, soils, microbiotic crusts, watersheds, etc.

Response: Different grazing systems are used to achieve different results. Decisions of the type of grazing system used is made at an interdisciplinary team and line officer level to meet the objectives within specific allotments (Region 5-EM-TP-004). The final forest plan establishes limited operating periods for sage grouse breeding (SPEC-SG-STE 06) and nesting (SPEC-SG-STD 07) habitats. The final forest plan also contains desired conditions to address microbiotic crusts TERR-SAGE-DC 03 and TERR-PINY-DC 03.

6017

Typically, a 10-15 percent upland utilization standard must be put in place to provide protective vegetative cover for sage-grouse, many other native biota, and watershed protection and stability.

Response: Many different factors are taken into consideration when setting utilization standards for different habitat types and conditions of rangelands. The analysis and planning guide, Region 5-EM-TP-004, provides the methodology to determine the vegetation conditions for which the utilization standards are established. The final forest plan outlines utilization standards for different vegetation types in RANG-FW-STD. The final forest plan also includes a standard that addresses the establishment of key areas in upland sage grouse habitats in SPEC-SG-STD 08.

6018

No grazing disturbance during active or critical growing periods for native grasses and forbs as it can weaken and/or kill native plants and it is very difficult if not impossible to accurately measure how much use occurs when plants are grazed while actively growing.

Response: Established grazing seasons are based on several considerations, including phenology (and growing periods) of native plants. Grazing seasons are adjusted during project level analysis for the development of the allotment management plan.

6019

On very erodible soils, erosion from wind and water must be sharply limited. Apply an upland trampling standard to limit disturbance to soils, microbiotic crusts, and native plants including seedlings. This must require less than 5 percent livestock trampling of the area of a square meter monitored at representative typically grazed sites across the pasture. In riparian areas, very protective trampling standards must be required in all riparian areas, and other measures must be put in place.

Response: The final forest plan contains desired conditions to address microbiotic crusts TERR-SAGE-DC 03 and TERR-PINY-DC 03. The final forest plan establishes trampling standards for riparian areas in RANG-FW-STD 07, MA-RCA-GDL 06, and MA-RCA-STD 06.

6020

No areas of a pasture and allotment, including those receiving the most livestock intensive use, should be allowed to receive greater than 10 percent of the surface area being trampled. These disturbed sites create epicenters of disturbance where weed invasion starts. Stocking levels and requirements for active herding must be properly applied so that these standards can be met during every grazing disturbance episode.

Response: The final forest plan outlines utilization standards for different vegetation types in RANG-FW-STD. The final forest plan includes INV-FW-STD 03 and INV-FW-GDL 04 to control and prevent the establishment or spread of noxious weeds.

6021

Please also include all management and herding controls necessary to minimize conflicts with native predators.

Response: See response to comment 6096.

6022

Please also apply shrub protection standards, and require shrub structural integrity standards. No sagebrush plants or other shrubs anywhere in the pasture should receive more than 5 percent breakage, browsing, or other impacts.

Response: The analysis and planning guide, Region 5-EM-TP-004, provides the methodology to determine the vegetation conditions for which the utilization standards are established. The final forest plan outlines utilization standards for different vegetation types including sagebrush in RANG-FW-STD.

6023

Keep willow browse by livestock below 20 percent of annual growth in critical amphibian habitat.

Response: The final forest plan outlines utilization standards for different vegetation types including willow in RANG-FW-STD. Site specific management for listed species is established through consultation with U.S. Fish and Wildlife Service under section 7 of the Endangered Species Act.

6024

Salt and especially supplements should not be allowed as they create concentration points which are initiation points of noxious weeds. The chemical composition of any

supplements used must be disclosed, especially if they could affect water or cause increased livestock consumption of woody browse.

Response: The final forest plan includes standards MA-RCA-STD 17 and RANG-FW-STD 04 to reduce concentrated use in riparian areas.

6025

Livestock use must not be shifted and intensified into other fragile sites or vegetation communities, or other rare species impacted. Reductions, not shifted use, must be employed.

Response: The analysis and planning guide, Region 5-EM-TP-004, provides the methodology to determine the vegetation conditions for which the utilization standards are established. The final forest plan outlines utilization standards for different vegetation types in RANG-FW-STD. Management actions should be directed in such a way that is compatible with desired conditions, goals, standards and guidelines for other terrestrial vegetation, including special habitats and at-risk species.

6026

Road closures to protect species (such as big game winter range and nesting/young rearing season closures) must apply to ranchers, too.

Response: Inyo National Forest 2009 Motorized Travel Management decision, designate travel routes and set seasonal closures. Permittees are allowed exemptions as necessary to properly manage livestock. The designated official has authority to review authorized exemptions on a site by site basis.

6027

Active restoration should consider seeding with local native ecotypes in areas of more livestock intensive use/weed lands caused by livestock concentrations. This should not result in removal of shrubs which help minimize weed expansion risk.

Response: FSH 2609.26 chapter 40 directs the use of native seed and plant material in all restoration activities and are decided at the project level. The Inyo conducts active seeding restoration projects for range management under site specific project decision.

6028

RANG-FW-GDL-02: Not only should stock travel ways "be maintained in usable conditions," but it is important that the Forest Service also monitor and evaluate impacts of stock travel ways on federally listed or at-risk amphibians.

Response: All activities that occur in suitable habitat for federal listed species are evaluated in a biological assessment and consultation occurs with the U.S. Fish and Wildlife Service. Management requirements are applied as necessary to ensure the continued persistence of the listed species.

6029

Include methods to verify stocking numbers and locations/whereabouts of livestock (GPS). This can help ensure that trespass and unauthorized use does not occur, and that livestock stay out of sensitive areas and avoid conflicts with important values.

Response: The Forest Service has the authority to count livestock as they enter the allotment under existing policy and term permit conditions. It is up to the permittee, as the livestock owner and manager to ensure livestock do not trespass into areas livestock are not authorized. The use of GPS equipment to monitor livestock has not identified as a necessary tool to monitor livestock movement. However, there is nothing to prevent the use of this technology if livestock operators choose to use it.

6030

Sierra National Forest and Inyo National Forest: Range, Forestwide 05: In the Sequoia draft, there is direction which reads as follows: "the productivity of all forest rangelands is maintained or improved through adequate protection of the soil, water, and vegetative resources." This direction is not found in the Sierra or Inyo plans, but we believe that it should be.

Response: The Inyo range direction reads, “RANG-FW-DC 02: Forage, browse and cover meet the needs of wildlife and authorized livestock are managed in balance with available forage. Areas that are grazed have or are trending toward having satisfactory soils, functional hydrology and biotic integrity” and “RANG-FW-DC 03: Domestic livestock grazing maintains the desired rangeland vegetation types represented by diverse plant functional groups, species richness and diversity, and structure and condition of plant communities.” Maintaining these features implies that these values will be protected.

6031

The agency must commit to timely annual monitoring during and after the grazing period, or livestock grazing should not occur in areas that have not been monitored.

Response: The Forest Service undertakes timely monitoring during and after the grazing period; extent of monitoring is subject to fiscal and workload constraints and monitoring obligations required under Endangered Species Act terms and conditions. The permittee is also expected to monitor during grazing utilization levels and move livestock with allowable utilization levels are being reached.

6032

Monitoring sites must be based on use pattern mapping, and must reflect areas that are receiving significant livestock use.

Response: As described in chapter 3, Rangeland Livestock Grazing, rangeland utilization standards are established for different vegetation types based on similarity to desired vegetation condition and hydrologic function at grazing key areas (RANG-FW-STD 01 and 02). Utilization monitoring is based on the key area concept in which key forage species are monitored at grazing and browsing key areas. Once the utilization standard is reached on a key species, livestock are required to be removed from that area (RANG-FW-GDL 02). Grazing utilization standards are adjusted if rangeland condition evaluations indicate that a key area is not moving towards desired conditions.

6033

Monitoring sites should be open to visits by all interested parties.

Response: Monitoring sites are most often placed on public lands and are open to all interested parties. In 1996, a Memorandum of Understanding (MOU) for Cooperative Rangeland Ecosystem Monitoring was agreed to by the Forest Service, Bureau of Land Management, Natural Resources Conservation Service and University of California Cooperative Extension. As stated in the Interagency Utilization Monitoring Guide, it is these agencies' intent to encourage participation by grazing permittees and interested publics using accepted interagency protocols. Standards RANG-FW-STD 01 and 02 direct managers to follow protocols found in the regional rangeland guide, which includes these interagency protocols.

6034

In lentic, lotic and meadow sites, areas back from the green line along the stream must be measured and monitored. Similar standards must be applied in these areas, too. Cross-section monitoring must also take place. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow, yet are critical for protecting and conserving vital watershed values, and protecting riparian/meadow areas linked to proper aquatic habitat conditions for native biota.

Response: The Inyo grazing utilization standards provide guidance for wet and moist meadow types on active grazing allotments, which is the area adjacent to the riparian component of the meadows. Utilization monitoring occurs throughout these areas, using the key area concept (where monitoring is focused in the area where livestock tend to focus their grazing because the more desirable forage species occur there.) Region 5-EM-TP-004 Cross-section monitoring takes place during project specific watershed assessments. The mesic and meadow areas are considered during proper functioning condition assessments, they are a critical component for watershed and hydrological function (MA-RCA-STD-13).

6035

Agencies have long biased monitoring of impacts by measuring only the thin green line right by the water's edge. This is heavily biased to tracking only those species most likely to regrow following heavy grazing rather than the vegetation in the adjacent riparian/meadow area.

Response: Monitoring occurs throughout the many different ecotypes within allotments to manage for desired conditions (RANG-FW-DC) usually in the areas that attract the most amount of grazing due to the desirable forage species present, also known as key areas. Several protocols are used on the Inyo, including the vegetation transect used for determining utilization levels in all types (RANG-FW-STD 01, 02,03) of meadows, sagebrush, desert shrub, grassland, bitterbrush, willow habitat, aspen, alpine meadow and alpine dwarf shrub and also the Region 5 rangeland rooted nested frequency long-term vegetation plots, which focus on meadows and the green-line.

6036

Willow browse by livestock should be mandated to be actively monitored by the forest in representative transect locations within each allotment, especially in critical

amphibian habitat in order to keep willow browse by livestock below 20 percent of annual growth.

Response: The final forest plan outlines utilization standards for different vegetation types including willow in RANG-FW-STD. Site specific management for listed species is established through consultation with U.S. Fish and Wildlife Service under section 7 of the Endangered Species Act.

6037

The draft plans should all be revised to prevent grazing in riparian areas, including meadows and springs, after wildfire to protect the ecological integrity of these systems and to support their recovery.

Response: Additional forest plan objectives and guidelines have been added to address post-fire grazing (RANG-FW-GOAL 02 and RANG-FW-GDL-01). The status of grazing after wildfire is decided at the project level, but typically grazing is curtailed in wildfire locations until it is determined by a range specialist that sufficient re-generation and re-colonization of desirable plants has occurred.

6038

Grazing post-fire must include integrated invasive species controls, and grazing must be sharply curtailed to aid in this effort. Removal of livestock for a minimum of 10 years must be required. Specific recovery criteria for native grasses, forbs, shrubs and microbiotic crusts must be applied and attained before grazing can again resume. Following any fires, rehab will not result in building temporary or other fences. Instead, grazing will be removed from the pasture and/or allotment in order to provide undisturbed habitat and buffer conditions for species just suffering new habitat loss.

Response: Additional forest plan objectives and guidelines have been added to address post-fire grazing (RANG-FW-GOAL 02, RANG-FW-GDL 01). Invasive species guideline INV-FW-GDL 01 and 02 do require an integrated weed management approach. There is very little literature about the effects of grazing to plant communities on post-fire rangelands. The Forest Service is currently working in partnership with University of California-Davis to gather more information on post-fire grazing effects.

6039

The draft plans have carried over the very prescriptive standards from the 2001 and 2004 Sierra Nevada Forest Plan amendment for rangeland management, which is not in keeping with the objective of the new planning rule and is inconsistent with the stated intent of the forest plans. Rather than providing flexibility to "allow management to adapt to local conditions," rigid standards have been included and the Forest Service should consider revising the language to provide appropriate flexibility and reflect the latest science.

Response: The modified proposed action does make several changes so the range direction is less prescriptive and more descriptive. Rangeland evaluation processes will be moved out of forest plan direction and into a forest range analysis guide. Additional forest plan objectives and guidelines have been added to: address post-fire grazing (RANG-FW-GOAL 02, RANG-FW-GDL 01), change make streambank disturbance standards to management indicator (RANG-FW-STD 07), and add a disturbance indicator for fens (RANG-FW-STD 08). This change will allow management more flexibility when adopting best available science protocols and achieving compliance with management direction.

6040

The strict requirements for percent forage use based on seral status, stubble height and streambank alteration, and for woody browse in the riparian conservation areas in the revised forest plans should be removed or incorporated as recommended guidelines or indicators.

Response: The forest plan includes proposed utilization standards for ten different rangeland vegetation types based on similarity of current condition to desired conditions. Language in the plan is descriptive, and includes desired plant species in each of these types. Guidance on how managers will determine the base allowable utilization standard can be found in a supplement called “rangeland analysis and planning guide” (Region 5-EM-TP-004) that resides outside the forest plan. We have been using utilization standards from amendment 6 (1995). Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that the Inyo will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6041

Standard MA-RCA-STD 17, page 63, requires removal of livestock "from any area of an allotment when browsing indicates a change in livestock preference from grazing herbaceous vegetation to browsing woody riparian vegetation." The use of the term "any" is too expansive and unworkable. The standard should provide for other mitigation measures besides livestock removal including the use of temporary fencing or additional herding. Recommendation: Modify this standard allow for other management measures.

Response: MA-RCA-STD 12 states, “Manage livestock grazing to attain desired conditions in riparian conservation areas. Where livestock grazing is found to be contributing to a decline in the function of riparian systems, modify grazing practices as prescribed in the Inyo Forest Supplement to the Region 5 Rangeland Analysis and Planning Guide. If adjusting practices is not effective, remove livestock from that area using appropriate administrative authorities and procedures.”

6042

Guideline MA-RCA-GDL 07: Consider revising this guideline to provide sufficient flexibility to allow for a site-specific decision to leave an existing livestock watering trough within the riparian zone.

Response: Riparian conservation area standard MA-RCA-STD 17 has been developed to restrict placement of new livestock facilities in meadow and riparian locations. However, it does allow placement within riparian conservation areas if it meets watershed and water quality best management practices.

6044

RANG-FW-DC 01. Revise the desired condition to read: "Rangelands, along with grazable forestlands and woodlands, provide large areas of contiguous space supporting native vegetation that has the potential to be grazed by domestic livestock. These ranges sustain family owned businesses and rural economies, biological

diversity and ecological processes, and help to preserve the rural landscape and cultural heritage and social fabric of the central, southern and eastern Sierra Nevada."

Response: The Inyo National Forest RANG-FW-DC 01 reads, "Rangelands, along with grazable forestlands and woodlands, provide large areas of contiguous space supporting native vegetation that has the potential to be grazed. These grazable landscapes sustain biological diversity and ecosystem integrity and help to preserve the rural landscape and cultural heritage of the central, southern and eastern Sierra Nevada."

Rangelands are utilized by grazing animals other than domestic livestock. Other regulations require we consider local sustainability and social issues.

6045

RANG-FW-DC 02. Revise to read: "Domestic livestock grazing supports the social and economic conditions of rural economies, is an important tool to help reduce fine fuels and provide sunlight for the growth of desired vegetation, and maintains the desired vegetation represented by diverse plant functional groups, species richness and diversity, and structure and condition of plant communities."

Response: Rangeland desired conditions (RANG-FW-DC) 01 through 03 address preserving the rural landscape, maintaining biotic integrity, and species diversity.

6048

Guideline RANG-FW-GDL 03, page 103, states that "domestic livestock should be managed to meet wildlife needs in identified important wildlife habitat areas." This guideline should be eliminated because nowhere does the plan define "important wildlife habitat areas" and the guideline will be subject to abuse and used to curtail grazing because plaintiffs will argue that all acres are "important wildlife habitat areas."

Response: The final forest plan includes guidelines; RANG-FW-GDL 03 "Consider the impacts to fisheries, wildlife, recreation, watershed, and rangelands when designing rangeland improvements or structures, such as water storage structures." And GDL-06 is specific to mule deer, "Account for mule deer forage when determining livestock animal unit months on key deer winter range and other important habitats such as migration routes, holding areas, and fawning areas."

6051

Specifically state in the draft environmental impact statement that appendix K from the 2004 Sierra Nevada Forest Plan Amendment is to be incorporated into the revised forest plans.

Response: Rangeland capability and suitability are not being re-analyzed in this in forest plan revision. An acreage summary and illustration of current rangeland suitability is provided in the chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management. When rangeland capability and suitability are analyzed at the project level, it will follow direction outlined in the Region 5 Analysis and Planning Guide Region 5-EM-TP-004.

6052

The following objectives, standards, and guidelines are strongly recommended to be added into each of the three forest plans in order to increase ecological restoration, ensure protection of water quality, and improve conditions for wildlife species

associated with aquatic habitats. Objective - Protect the health of forest visitors by ensuring forest waters meet the standards for recreational contact with water in all streams throughout the forest. Standard - Monitor water quality (in compliance with the appropriate regional water board protocol) in at least one grazing allotment annually by sampling water quality at a representative stream location where livestock may concentrate or persist for extended periods. Guideline - Within 2 years of forest plan approval, the forest shall select a representative area with a high level of dispersed recreational use that also overlaps with livestock use. Within 5 years of forest plan approval, at least one season of water board-consistent protocol sampling of water quality shall be implemented in the stream at that site by the forest in order to assess whether the water consistently meets health and safety standards for recreational contact.

Response: Guideline RANG-FW-GDL 09 has been added to the proposed direction for grazing. It states: *Achieve compliance with Clean Water Act, Endangered Species Act, and National Historic Preservation Act through application of other numeric indicators as applicable when (a) relevant indicators (e.g., water quality, aquatic habitat, riparian vegetation) depart from desired conditions or are not improving due to livestock influence, and (b) required under a water quality restoration plan for impaired water.*

The plan also includes a desired condition in the "Watershed" section of chapter 2, WTR-FW-DC 02: Water quality supports State-designated beneficial uses of water. This would include recreational uses.

The forest plan monitoring program also has two monitoring questions addressing water quality. Monitoring question WS02 states: To what extent has erosion from temporary and permanent roads and trails affected water quality and soil sustainability in the forest? And monitoring question AE03 states: What is the status of water quality in forest waterbodies?

The recommended standard and guideline in relation to establishing water quality locations was not brought forward because we have to comply with other laws, regulations, and policies in relation to water quality, this includes any regulations from the State Water Quality Board that apply to grazing or recreation impacts to water quality. These regulations can apply at the project-level in some cases and are established during that process.

6053

We recommend the following additional direction: "In locations where surface water resources are valuable to recreational travelers for treatment and consumption, and that water is also important to range stock, efforts are made to provide for both uses through development of protected sources for recreational use and separate provision for livestock consumption."

Response: The plan addresses availability of water sources for recreationists and livestock in the "Rangeland Livestock Grazing" section of chapter 2. A goal is included that states: *Consider the impacts to fisheries, wildlife, recreation, watershed, and rangelands when designing rangeland improvements or structures, such as water storage structures* (RANG-FW-GOAL 03). A guideline is also included in this section that states: *During permit reissuance for livestock, evaluate the impacts of facilities on the riparian conservation areas and consider relocating existing livestock facilities outside of meadows and riparian areas* (MA-RCA-GDL 03). Further direction on protecting water sources available for beneficial uses, including drinking water, are also found in WTR-FW-DC 03. Forest management must also adhere to other relevant laws, regulations, and policies associated with water quality that do not need to be repeated within the

forest plan (36 CFR 219.2((2)). The recommended language was not added into the plan because the plan contains relevant direction to address water sources for recreation and grazing uses. The location of these drinking sources would be determined at the project-level.

6054

Grazing lease terms and conditions should be coordinated with other agencies such as Bureau of Land Management that are adjacent to the national forests.

Response: Direction is provided in 36 CFR 222.7(c), for the Forest Service to cooperate with other Federal agencies that have interest in improving range management on public and private lands.

6055

There must be much more protective specific measurable goals and objectives that provide an adequate level of protection and buffer from climate change stress.

Response: See responses 7240, 7251, 9122, 9124, and 9126.

6056

Current regional office policy leads to seral status inflation. Seral inflation techniques misclassify meadows as mid or late seral dry meadow vegetation classification when they are actually degraded, desiccated wet meadows, which undermines an objective range condition assessment. Such an action indicates that a historically-damaged site is in a healthier condition than it actually is, and such a distorted view will usually result in a level of allowable livestock grazing pressure that will likely impede restoration of that site. This could impede local forest compliance with National Forest Management Act requirements that require national forests to provide "ecological conditions that provide a high likelihood of supporting [or contribute to supporting] over time the viability of native and desired non-native species well distributed throughout their ranges." Measures are needed to prevent inflation of seral status during assessment of Sequoia National Forest, Sierra National Forest, and Inyo National Forest meadows.

Response: Current Forest Service meadow condition and trend monitoring accounts for the meadow hydrogeomorphic type as described in (Region 5-TP-034), depth to soil mottling or saturation, existing vegetation and soil cover measurements (USDA FS June 2014). The rangeland plant list (Region 5-TP-042) and ecological rating system does account for common undesirable non-native plant species or plant nativity. Undesirable non-native species are generally labeled as intermediate (syn. Increaser) or ruderals (syn. Invaders). This plant list has been incorporated by reference into the Inyo utilization standards tables (RANG-FW-DC) under rangeland vegetation types.

Meadow hydrogeomorphic typing and vegetative condition assessments, in combination with hydrologic function evaluations, provides an accurate overall condition rating of meadow complexes.

6057

Degraded, desiccated wet meadow sites should be classified as early seral stage sites until such sites have largely regenerated late seral stage characteristics.

Response: The Inyo grazing standards (RANG-FW-STD 01, 02 & 03) and guidelines (RANG-FW-GDL 04) account for both desired vegetation conditions and hydrologic function. If a

meadow site is degraded the assessment for these site conditions would account for a reduced proper use level or total rest.

6058

To prevent seral inflation, the Forest Service should eliminate seral plant indicator ratings of mid seral or late seral for all undesirable non-native plant species (including *Poa pratensis*) on the regional plant list. I also recommend that the region eliminate mid and late seral ratings for certain native plants when those particular plant species site occurrences can be reasonably attributed to the livestock-induced degradation and desiccation of a wet or moist meadow site.

Response: The current Forest Service rangeland plant list (Region 5-TP-042) and ecological rating system does account for common undesirable non-native plant species or plant nativity. Undesirable non-native species are generally labeled as intermediate (syn. Increaser) or ruderals (syn. Invaders). This plant list has been incorporated by reference into the Inyo utilization standards tables (RANG-FW-DC) under rangeland vegetation types.

6059

Desired conditions for rangelands and riparian conservation areas should be realistic and take into account factors other than current permitted livestock grazing (climate change, fire exclusion, altered states and transitions) in determining management direction. For example, it is unrealistic to expect all meadows to be in a mid to late seral status. Management direction should allow for adaptive management based on local, site-specific conditions and potential in keeping with the stated intent of the new plan revisions. Remove the specific language about seral status in meadows. Consider best available science regarding site potential (for instance, Briske et al 2005).

Response: The desired conditions descriptions for rangelands (RANG-FW-DC) and riparian conservation areas (MA-RCA-DC).

We determined rangeland management and production grazing did not need to change for several reasons: 1) grazing direction had been covered by recent plan amendments (2004 Sierra Nevada Forest Plan Amendment); 2) the Inyo National Forest Assessment (2012) indicated the current management appears to be moving toward desired conditions; and 3) effectiveness monitoring of grazing direction is still being assembled (UCD) therefore science is not “ripe” to make range a topic for need to change current grazing direction.

Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6061

The amendment 6 riparian vegetation watershed protocol requires an excessively demanding combined number of degraded and/or non-functional ratings to trigger a mandatory livestock removal action. In contrast, Sierra Nevada Forest Plan Amendment

standards and guidelines 120 does not appear to require non-functional watershed ratings in order to trigger mandatory livestock removal.

Response: Sierra Nevada Forest Plan Amendment standards and guidelines 120 reads that under season long grazing, rest or modifying the grazing management is required, which is different than livestock removal. The amendment 6 protocol provides the same direction, depending on the scorecard rating, to either modify the grazing or rest the area. But either direction, it must be demonstrated that the area is in a downward trend and has past some threshold. The more prescriptive amendment 6 just categorizes those thresholds. It only takes two non-functional ratings out of six rated factors to trigger rest for a key area, even though other portions of the key area may rate as fully functioning.

6062

Appendix F is extremely detailed and prescriptive in its requirements for analysis and monitoring of rangelands and is overly restrictive of grazing management. This is incompatible with the intent of the new planning rule and the stated intent of these plan revisions. Additionally, these standards were developed over 20 years ago and do not necessarily reflect best available science and information. Draft forest plan standards should be revised to describe rangeland management direction as broad goals or guidelines and not include the specific prescriptive requirements identified above. The forest plans should include language that would allow a site specific determination based on professional judgment and quantifiable data in partnership with the permittee to determine appropriate management practices to help achieve those goals.

Response: We determined rangeland management and production grazing did not need to change for several reasons: 1) grazing direction had been covered by recent plan amendments (2004 Sierra Nevada Forest Plan Amendment); 2) the Inyo National Forest Assessment (2012) indicated the current management appears to be moving toward desired conditions; and 3) effectiveness monitoring of grazing direction is still being assembled (UCD) therefore science is not “ripe” to make range a topic for need to change current grazing direction.

Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

6063

The method of evaluating grazing allotments described in appendix F is not appropriate for sheep grazing that results in denuding patches of vegetation when sheep are herded and huddle together and eat all vegetation (as observed in June Lake allotment on Inyo).

Response: The management described is referred to as “bedding grounds” where a sheep band is herded together during the night so that they can be protected from predators. It is a necessary activity of sheep herding. These impacts are analyzed during site-specific grazing allotment analysis and do not reflect utilization standards that are determined through the process described in appendix F.

6064

Forestwide rangeland standards of appendix F are carried forward from 1988 plan amendment which relies on vegetation standards as management criteria. These do not address impacts to aquatic ecosystem resources, and the watershed evaluation criteria do not include biological indicators. Sensitive macro-invertebrate indicators need to be incorporated into evaluations of different allotments and types of grazing system used.

Response: Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

The Inyo Forestwide rangeland standards identified are just part of the process used to determine grazing strategies. They are specific to maintaining good or improving vegetation and watershed characteristics. The grazing methods and utilization levels identified through the process for each grazing area takes in to consideration the needs of other aquatic organisms and wildlife and other ecosystem values. Other standards and guidelines, such as those in the conservation watersheds MA-CW-STD 01-03, and other standards in RANG-FW-STD and RANG-FW-GDL, do take in to account practices and restrictions that provide more targeted conservation practices aimed at providing and maintaining resources for other aquatic species.

6065

The Inyo National Forest plan does not adequately address grazing. The plan components based on amendment 6 are outdated and do not incorporate more recent best available science information. The condition of meadows and rangelands is poor in areas but not discussed sufficiently. The plan needs to incorporate more recent best available science information, including more contemporary range management practices, and specific means to improve range condition.

Response: Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

We determined rangeland management and production grazing did not need to change for several reasons: 1) grazing direction had been covered by recent plan amendments (2004 Sierra Nevada Forest Plan Amendment); 2) the Inyo National Forest Assessment (2012) indicated the current management appears to be moving toward desired conditions; and 3) effectiveness monitoring of grazing direction is still being assembled (UCD) therefore science is not “ripe” to make range a topic for need to change current grazing direction.

6068

We appreciate the forestwide guidelines for weed-free hay and mulching materials (INV-FW-GDL-03/04). Livestock rest purging periods should be added as a guideline, as well as the relationship of invasive species to commercial pack stock operations.

Response: This proposed guideline was considered during the 2001 and 2004 Sierra Nevada Plan amendment analysis. From that analysis it was determined that requiring purging or quarantine periods would be impractical and unattainable to enforce by law enforcement officers as a region or forest order or prohibition.

6069

The Forest Service and livestock grazing permittees should be represented in interagency and cooperative working groups to manage species of concern such as sage grouse, golden trout and Sierra Nevada bighorn sheep (Inyo National Forest).

Response: It is Forest Service policy to include other agencies, organizations, permittees, and other stakeholders in range management planning development. FSH 2203.1, 8 & 14. CFR 222.7 (b), (c), (d).

6070

The plan does not address the poor condition of meadows on the INF. Half of the meadows on the Inyo National Forest are at risk, degraded or non-functional and all of these damaged meadows are within grazing allotments. The plans need to be revised to make it more certain that these trends will be reversed.

Response: Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

The procedures do address meadow condition by evaluating the condition of the meadow using an interdisciplinary team and determining a grazing method that addresses features that are not at desired conditions, and provides many different actions that would move the meadow condition in an upward trend.

6072

Amendment 6 – Inyo National Forest.

The analysis of impacts of grazing on vegetation and native plant communities is flawed. The underlying assumptions and analyses used are not fully disclosed. The analysis needs to be revised and more substantiated.

The analysis of native vegetation communities and ecological communities is incomplete and flawed. There is a range bias in the Natural Resources Conservation Service ecosite concept and this concept appears to have been used.

Any ecosite/NRCS "reference" sites must be revealed, as well as any studies of disturbance intervals. A map of any claimed reference sites must be provided so that

the public can understand and verify the validity of claims being made about native vegetation communities and ecological conditions.

Do not rely on ecosites to destroy native plants to meet some kind of ideal (desired condition) site.

All exclosures must be identified and studied, and past trespass must be determined and disclosed.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

At this time, we do not use NRCS Ecological Site Descriptions. A description of reference sites for montane meadows is provided in the final environmental impact statement.

6073

There is no range/grazing suitability determination and map for the forest and no allotment plan. The plan revision process is the appropriate time to address programmatic adjustments to range management that consider the best available science information and the requirements of the Planning Rule to provide for ecological integrity and for the diversity of plants and wildlife in the plan areas.

Response: Rangeland capability and suitability are not being re-analyzed in this forest plan revision. Previous grazing suitability determinations are carried forward with no change. Decisions to authorize or discontinue livestock grazing at the allotment level are made following project-level environmental analysis, and not at the programmatic level.

6074

The draft environmental impact statement and draft plans fail to quantify important resource information. There apparently is no information about relative capability and productivity of the plan area to support grazing activity in either permanent or transitory range. No quantification of how far the permitted level of grazing is below the productive capacity. There is no information about how many animal unit months (AUMs) are available on vacant allotments. This information is important to identifying how to improve and maximize grazing management.

Response: See response to comment 6073.

6075

Clarify in the draft environmental impact statement that lands within existing grazing allotments have been determined to be suitable unless otherwise specifically identified through allotment planning and decision-making to be unsuitable. Include a map in the draft environmental impact statement of existing active and vacant grazing allotments for each forest.

Response: See response to comment 6073.

6076

Grazing allotments need to be maintained where they currently exist and closed historic allotments should be opened as grazing helps reduce fuel loads and improve meadow conditions.

Response: Vacant allotments can be considered for re-stocking during a site-specific, project-level environmental analysis. During the analysis issues such as fuel load reduction and meadow improvement will be considered.

6077

Templeton and Little Whitney grazing units should be open to grazing again.

Response: See response to comment 6076.

6078

Add a new forest wide range goal at RANG-FW-GOAL 05, page 83, Recommendation: Add the goal, "Expand livestock grazing to make use of underutilized capacity."

Response: There is already national policy covering this subject. FSM 2203.1, 6 gives direction as, “Consistent with forest land and resource management plans, make forage available to qualified livestock operators from lands that are suitable for livestock grazing.”

6079

Close vacant and active allotments where there is limited capable and/or suitable land.

Response: Rangeland capability and suitability are not being re-analyzed in this forest plan revision. Decisions to authorize or discontinue livestock grazing at the allotment level are made following project-level environmental analysis.

6080

A full and detailed site-specific current data based analysis of capability and suitability must be conducted following wildfires.

Response: Additional forest plan objectives and guidelines have been added to address post-fire grazing (RANG-FW-GOAL 02 and RANG-FW-GDL-01). The status of grazing after wildfire is decided at the project level, but typically grazing is curtailed in wildfire locations until it is determined by a range specialist that sufficient re-generation and re-colonization of desirable plants has occurred.

6081

Each land and resource management plan should have plan components to close unneeded, unused, unwanted, or impacted livestock grazing allotments, and a mechanism that allows allotments with waived permits to be retired.

Response: The final forest plan includes rangeland desired conditions and goals (RANG-FW-DC, RANG-FW-GOAL) to address livestock grazing in appropriate areas during site-specific project-level planning for individual allotments.

6082

Modify the plan to adopt measures that allow for closing livestock grazing allotments in sage-grouse habitat.

Response: The plan does include proposed utilization standards for sagebrush/bunchgrass vegetation but does not call for closing grazing allotments in sage-grouse habitat. Additional guidelines have been added that require further adjustment of grazing utilization or disturbance levels when needed to obtain properly functioning riparian conservation areas. Limited operating periods or avoidance to specific wildlife species are identified at the project-level during environmental analysis for sage grouse breeding (SPEC-SG-STD 06) and nesting (SPEC-SG-STD 07) habitats.

6083

The plan should have provisions to allow for conservation buy-out should a distressed rancher want to waive his or her grazing lease to a third party conservation entity.

Response: This would need to be addressed with national regulation, policy and direction. The Forest Service is directed to make forage available on lands suitable for grazing. FSM 2203.1, 6.

6084

Grazing analysis inadequately addresses benefits. Need to revise the draft environmental impact statement to recognize the role of grazing for such things as fuels management, post-fire management, improving control of weeds, maintaining open space, productive wildlife habitat, benefits to sage-grouse, and supporting rural economies.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

6085

U.S. Forest Service should not curtail permitted grazing when managing habitat for included at-risk species.

Response: There are standards in place that allow for grazing to continue when managing for at-risk species. The range standards in conjunction with the following desired conditions, provide for both uses on the landscape. TERR-SH-DC-01, SPEC-SHP-DC-01, SPEC-SG-DC-01.

6086

The U.S. Forest Service should participate in studies conducted to analyze how grazing can be increasingly utilized to address pre- and post-post fire management as well as invasive species management.

Response: Additional forest plan objectives and guidelines have been added to address post-fire grazing (RANG-FW-GOAL 02, RANG-FW-GDL 01). Invasive species guideline INV-FW-GDL 01 and 02 do require an integrated weed management approach. There is very little literature about the effects of grazing to plant communities on post-fire rangelands. The Forest Service is currently working in partnership with University of California-Davis to gather more information on post-fire grazing effects.

6087

Range effects analysis should recognize that some browsing occurs by deer and insects which should be reflected when utilization measures are developed and when effects are discussed.

Response: Browse utilization standards are intended for browsing caused by both livestock and wildlife. Under guidelines RANG-FW-GDL 03 and 04, monitoring sites are selected to account and adjust for wildlife use. Under RANG-FW-GDL 04, 05, and 06 adjustments to monitoring strategies and management actions are made at the project specific analysis level.

6088

Domestic livestock grazing impacts were not thoroughly examined in the forest plans or draft environmental impact statement. Necessary analysis and action is still lacking in the draft plans and draft environmental impact statement, which largely favor the status quo. The full public lands grazing disturbance footprint of operations must be fully examined.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

6089

Meeting range desired conditions can introduce and spread invasive species that increase wildfire intensity and conflict with the need to combat climate change. Livestock grazing contributes to the spread of cheatgrass.

Response: The descriptions in RANG-FW-DC directs to support native species in rangelands. Cheatgrass is present in many areas on the Inyo National Forest and surrounding areas, even in non-livestock occupied areas. It is also spread by wind and water. Grazing strategies, such as those available RANG-FW-STD, are designed to promote native vegetation in order to meet the desired conditions and reduce the establishment and spread of non-native species, such as cheat grass.

6090

The degree of desertification related to livestock grazing must be examined.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

6091

FSH 1909.12 Chapter 10 requires a range assessment to assess sustainability of ecosystems associated with rangelands such as meadows. The Forest Service must disclose monitoring results of the impacts of grazing on ecological integrity and species diversity. The assessments do not explain how these conditions provide for these values if conditions are reported outside of proper functioning condition (PFC) or are functioning at-risk (FAR). This should have been in the assessment as required by the directives.

Response: Rangeland capability and suitability are not being re-analyzed in this in forest plan revision. An acreage summary, authorized grazing use levels, and illustration of current rangeland suitability is provided in the appendices.

An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

6092

All three national forests are not meeting the Rescission Act schedule for range NEPA.

Response: The Rescission Act allows for flexibility in the timeline for accomplishing NEPA analysis in order to incorporate unforeseen challenges to completion of individual allotment analysis. See "Current Grazing" section in chapter 3 of the final environmental impact statement for more information.

6093

There are many suitable vacant allotments that could be used for grazing opportunities, and new permits cannot be issued without current NEPA.

Response: Vacant allotments can be considered for re-stocking during a site-specific, project-level environmental analysis. Twenty-two allotments are scheduled for environmental (NEPA) analysis or re-analysis within the next decade. See "Current Grazing" section in chapter 3 of the final environmental impact statement for more information.

6094

Due to the extremely long process of completing NEPA analysis to renew grazing allotment management plans as is required by the Rescissions Act, addressing this issue at the project level may mean degradation of water quality by livestock could continue without documentation and remediation year after year.

Response: State and forest standards for water quality regulations are implemented on all allotments regardless of when they are scheduled for analysis under NEPA. Livestock grazing permits are modified with the most current forest plan direction and other applicable laws and regulations, regardless of updated project level analysis.

6095

Access to grazing allotments needs to be preserved. This includes roads as well as trail systems that have been used to transport herds through the forest and into allotments in the past.

Response: During the travel management process, the Inyo ensured that roads used by permittees were either maintained, or were granted administrative access.

6096

The agency must require that permittees accept predator losses as a cost of doing business, for instance, abide by a hold harmless policy.

Response: No additional management direction for animal damage control is being addressed in this planning process. This is because agency policy for animal damage control (for instance, predation on permitted livestock) is directed by policy (FSM 2650.1) as authorized by the Animal Damage Control Act of 1931 (7 USC 426-426c). USDA Animal and Plant Health Inspection Service (APHIS) Wildlife Services carries out animal damage management activities on National Forest System lands to minimize livestock losses from predation by coyotes, black bears, and other predators. Under cooperative agreement (MOU 17-SU-11132422-231), APHIS WS must

coordinate such actives with the local Forest Service and California State Fish and Wildlife (CDFW) and tribes. Applicable depredation permits are issued by California State Fish and Wildlife. The 2017 memorandum of understanding identifies roles and responsibilities for each agency and further direction on treatment effectiveness, such as minimum requirements analysis for depredation in wilderness and annual reporting.

6097

Dead livestock must be removed from public lands when feasible.

Response: Language in every permit for the Inyo National Forest reads, "Dead animals will be moved at least 100 yards away from water, trails, roads, campsites, riparian areas and recreation sites within 48 hours of discovery."

6098

No calving/lambing operations should be allowed on public lands.

Response: Public Law 86-517; Approved June 12, 1960, does not differentiate between different livestock operations. At this time, there have been no issues identified on the Inyo National Forest regarding calving or lambing operations.

6099

No sheep camps in or near any sensitive habitats.

Response: The plan does not specifically address sheep camps, but it does address multiple uses in special habitats and other sensitive areas (for example, TERR-SH-DC 01, MA-RCA-STD 12).

6100

There should be a comparative analysis for the range program that compares the current forest plans to the proposed plans to ensure that conservation and minimization measures for sensitive species and habitat are not lessened by the new approach.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

6101

Please fully assess the degree that predator killing in this area may be adversely impacting native wildlife species and public recreational uses and enjoyment. This must include a full assessment of all activities on public and private lands, and any activity by Wildlife Services.

Response: See response to comment 6096.

6102

Unclear if the current population sizes of wild horse herds are within these identified management levels. It is also unclear what the U.S. Forest Service's strategy is for achieving and maintaining these management levels.

Response: The final environmental impact statement provides a description of where the wild horse and burro territories are located and what existing management direction is in place (final environmental impact statement, chapter 3, Benefits to People and Communities, "Wild Horses

and Burros" section). As stated in this section, the population size is estimated to be over the established appropriate management levels (AML) and the populations have moved outside the known territory boundaries. The plan includes direction for wild horses that outline steps we will take in the future regarding wild horse management. This includes a goal stating: *Continue working with other agencies and Forest Service units, such as the Bureau of Land Management and the Humboldt-Toiyabe National Forest, and other partners or collaborative groups to manage wild horse herds or in the development of wild horse management plans* (DA-WHT-GOAL 01). The plan does not address establishing new management levels for the territories; these would be established at the project-level when developing specific management plans for each territory.

6103

The draft Inyo National Forest plan is inadequate in addressing the severe overpopulation of wild horses. There should be monitoring of the herds and restoration of impacted sage-grouse habitat.

Response: See comment 6102. In addition, in response to this comment a potential management approach was added to the plan addressing the need to monitor wild horse populations (final plan, chapter 3, "Wild Horse and Burro Territories" section, Potential Management Approach).

Restoration of sage-grouse habitat would occur at the project-level when impacts from wild horses are observed. Plan direction for what restoration projects should achieve for sage-grouse are included in chapter 2 in the Animal and Plant Species section (SPEC-SG-DC; SPEC-SG-OBJ; SPEC-SG-GOAL; SPEC-SG-STD; and SPEC-SG-GDL).

6104

The draft environmental impact statement is inadequate in characterizing the wild horse population and impacts to areas of high biological value. There are adverse impacts to areas of high biological value, including bi-State sage grouse areas.

Response: An analysis of the impacts of wild horses to areas of high biological value, such as sage-grouse habitat, has been added into the final environmental impact statement (chapter 3, "Wildlife, Fish and Plants" section and "Wild Horses and Burros" section).

4008

Underlying bioregional assessment, biological evaluation, watershed/aquatic species evaluation, and other supporting documents do not provide an adequate baseline for the environmental impact statement process as they do not adequately address serious grazing issues, and do not take a candid science-based ecological look at livestock grazing conflicts in conjunction with adverse and/or harmful effects of vegetation treatments like thinning, logging or other deforestation or sagebrush manipulation. Please prepare a supplemental environmental impact statement.

Response: In addition to the documents listed in the comment, the baseline is also addressed in the final environmental impact statement (final environmental impact statement, chapter 3, "Affected Environment" sections for each resource). Analyses of impacts of grazing have been added to the final environmental impact statement in response to public comments (final environmental impact statement, chapter 3, "Environmental Consequences" sections for each resource). Additional consideration of livestock grazing is found in the "Benefits to People and Communities" section of the final environmental impact statement (chapter 3). While the forest plan doesn't propose particular actions in any specific places, it does indicate where certain

activities are suitable. For those areas that are suitable for treatments such as thinning, logging, and sagebrush treatments, general impacts of those activities are analyzed and disclosed in chapter 3 of the final environmental impact statement. While an additional draft environmental impact statement is being prepared for the Sierra and Sequoia forest plan revisions due to changed circumstances, the agency has concluded that this is not necessary for the Inyo Forest Plan revision. Rationale for this decision is disclosed in the final environmental impact statement (chapter 1) and record of decision.

4047

The draft environmental impact statement includes no focused discussion of the impacts of livestock grazing despite this being a prevalent discretionary action authorized across the three forests.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

4010

The draft environmental impact statement and draft plans violate the National Forest Management Act, NEPA, Endangered Species Act, and Administrative Procedures Act by dismissing the wildlife mandates of the National Forest Management Act Planning Rule in order to facilitate increased logging as well as to promote domestic livestock grazing in the forests while attempting to hide their increased logging desire behind references to a so-called "restored" condition.

Response: The draft record of decision includes findings required by relevant laws. The persistence analysis analyzes how plan components provide the ecological conditions necessary to maintain viable populations of species of conservation concern in the plan area (final environmental impact statement, appendix F).

4065

Range management should have been included in the need to change, and the environmental impact statement should include an alternative that eliminates grazing.

Response: Rangeland management and production grazing was not identified as a “need to change” topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. An analysis of livestock grazing and the effects of grazing direction was added to the final environmental impact statement (chapter 3, Benefits to People and Communities, Rangeland Products and Management).

4066

The environmental impact statement should include an alternative that reduces grazing (especially removal in areas for at-risk species habitat) and to benefit resources such as water quality and beneficial uses of water.

Response: Rangeland management and production grazing was not identified as a “need to change” topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. Also, see response to comment 4065.

4067

The environmental impact statement should include an alternative that removes grazing related developments such as fencing, water catchments, and salt licks.

Response: Rangeland management and production grazing was not identified as a "need to change" topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. Several standards and guidelines from the existing plan have been added to the final plan that require the proper use of salt, water or other feed supplements or facilities that might concentrate livestock or cause trailing (MA-RCA-STD 13 and 15 and RANG-FW-GDL 09). Other standards and guidelines provide direction to manage livestock to meet desired outcomes for watersheds, water quality, riparian areas, and sage grouse (FW-STD-RCA 11, FW-STD-RCA 12, SPEC-SG-STD 09-13). Provide direction on management, modification or removal of livestock facilities to mitigate potential impacts to sage-grouse. Impacts of grazing on resources has been added to the final environmental impact statement in response to public comments (chapter 3, "Environmental Consequences" sections for each resource).

4068

The environmental impact statement should include an alternative that specifies periods of rest. Rest means a 5-10 year period, or longer. Rest-rotation systems have been big failures, and do not provide sufficient rest for recovery of lands facing multiple weed and climate change threats.

Response: Additional guidance has been added to the final plan that provides options to make adjustments to grazing practices if monitoring indicates that desired conditions and goals are not being reached (RANG-FW-GOAL 02; RANG-FW-STD 02; RANG-FW-GDL 01-09). While periods of rest are not spelled out in these plan components, they are a tool that could be used under this guidance.

4069

Need a wide range of suitable alternatives that examines all direct, indirect and cumulative adverse effects of livestock grazing. This is also necessary to develop appropriate plan components for mitigation for any grazing that may continue.

Response: Rangeland management and production grazing was not identified as a "need to change" topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the final environmental impact statement, Benefits to People and Communities, Rangeland Products and Management.

4070

Evaluate a climate change and resource protection alternative. Under this alternative, all vacant grazing allotments and allotments that include bi-State sage- grouse habitat or proposed or designated critical habitats for listed species be closed to further livestock grazing. This would permanently protect threatened and endangered species and their habitats, wildlife habitats, rare plants species, watersheds, riparian features and other important resources, and would promote resilience to protect against the ongoing and predicted effects of climate change. Analysis of this alternative will aid the NEPA analysis by providing a basis for estimating the ecological costs of continued grazing on these resources. It would also mitigate impacts to watersheds and water quality (Derlet et al., 20101) and livestock removal would make these public lands less

susceptible to invasive species and to the effects of climate change (Beschta et al., 20122; Beschta et al.

Response: Rangeland management and production grazing was not identified as a "need to change" topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. An analysis of livestock grazing and the effects of grazing direction was added to the final environmental impact statement in response to public comments. Each action alternative addresses the potential impacts of climate change and move the planning area toward ecological integrity. Note that in chapter 1 of the final environmental impact statement, Purpose and Need for Revising the Forest Plans From Needs for Change to Revision Topics, the need to restore resilience of vegetation and aquatic and riparian ecosystems to fire, drought and climate impacts is part of the purpose and need for the revision and therefore all alternatives address this revision topic in differing ways.

4072

The benefits of passive restoration (allowing ecosystem components to heal through removal of grazing disturbance and other degrading activities) must be a fundamental basis for an environmental impact statement addressing grazing. Plan components should be developed focused on passive restoration for grazing impacted lands with targeted removal of facilities and/or linked roading that is the most impacting.

Response: Rangeland management and production grazing was not identified as a "need to change" topic as part of this plan revision effort; therefore, alternatives were not developed around grazing direction. The direction included in the existing forest plan was brought forward into the revised Forest Plan. An alternative that would have minimal active management and would "let nature take its course" was considered, but it was determined that it would not meet the requirements of the 2012 Planning Rule, which requires plans to be developed that are ecologically, socially, and economically sustainable (final environmental impact statement, chapter 2, Alternative Considered but Eliminated From Detailed Study section). It would also not achieve various aspects of the purpose and need.

4128

(Inyo Plan) Appendix F is extremely detailed and prescriptive in its requirements for analysis and monitoring of rangelands and is overly restrictive of grazing management. We believe this decision is incompatible with the intent of the new Planning Rule and the stated intent of these plan revisions. Additionally, these standards were developed over 20 years ago and do not necessarily reflect best available science and information. [Also noted in Inyo.]

Response: Rangeland assessment, inventory and monitoring protocols will be moved from the Inyo forest plan into a forest supplemental guide to the Region 5 Rangeland Analysis and Planning Guide (EM-TP-004). Other relevant agency analysis procedures will also be considered. This approach will allow managers to update monitoring methods according to best available science without the need or requirement to amend forest plan direction each time a monitoring procedure update is made (RANG-FW-STD 01 and 02).

Based on the public comments received on the draft environmental impact statement the Inyo updated the rangeland assessment procedures with best available science information and moved those procedures from appendix F (draft forest plan) into a specialist report in the planning record; it will not be in the final forest plan. New plan components provide that we will maintain

and keep updated a forest supplement to the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004).

4167

Include standards and guidelines to address the ecological integrity of meadows and that a revised draft environmental impact statement be circulated for review and comment.

Response: Riparian conservation area standards and guidelines are applicable to all riparian areas, including meadows (Final Plan, chapter 3, Management Areas, "Riparian Conservation Areas Introductory" section).. The section that discusses "Meadow Desired Conditions and Objectives" provides further meadow-specific direction (Final Plan, chapter 3, Management Areas, "Riparian Conservation Areas, Meadows" section). While an additional draft environmental impact statement is being prepared for the Sierra and Sequoia forest plan revisions due to changed circumstances, the agency has concluded that this is not necessary for the Inyo Forest Plan revision. Rationale for this decision is disclosed in the final environmental impact statement (chapter 1) and record of decision.

4231

Improve meadow and riparian habitat monitoring by incorporating elements of the surface water ambient monitoring program (SWAMP) of the State of California as guidance. Incorporate ecological indicators related to ecosystem structure, composition, and function and identify desired conditions based on the natural range of variation and other concepts. Update monitoring methods to provide a more science-based comprehensive evaluation of riparian habitat and watershed conditions.

Response: Rangeland inventory and monitoring protocols are in the Inyo National Forest supplemental guide to the Region 5 Rangeland Analysis and Planning Guide (EM-TP-004), rather than in the final plan itself. This approach will allow managers to update monitoring methods according to best available science without the need or requirement to amend forest plan direction each time a monitoring procedure update is made (RANG-FW-STD 01 and 02).

Monitoring for riparian habitat and watershed conditions in general are summarized in the forest monitoring plan (final plan, chapter 4). Details of the plan monitoring program—including monitoring and analysis protocols, data collection schedules, responsible parties, and data management—will be part of a separate monitoring guide (final plan, chapter 4, "Monitoring Program Introduction" section).

4242

Developing an inventory of air quality and soil quality for each meadow and at locations where salt licks are placed to attract livestock, would be appropriate places to monitor for air and soil quality in order to assess the conditions in the air and of the soil when compared with the conditions in other un-grazed areas. Surface and groundwater resources in the area of meadows and streams exiting meadows should also be part of an assessment of the environmental impacts on surface and groundwater including potential impacts from livestock grazing and would be an integral step in ensuring that a management plan protects the water quality in Sequoia, Inyo, and Sierra National Forests.

Response: Standards RANG-FW-STD 01 and 02 require an evaluation of desired vegetation and hydrologic function at a location prior to establishing a proper utilization level.

Guideline RANG-FW-GDL 09 has been added to the proposed direction for grazing. It states: Achieve compliance with Clean Water Act, Endangered Species Act, and National Historic Preservation Act through application of other numeric indicators as applicable when (a) relevant indicators (e.g., water quality, aquatic habitat, riparian vegetation) depart from desired conditions or are not improving due to livestock influence, and (b) required under a water quality restoration plan for impaired water.

Several existing standards (MA-RCA-STD 13 and 15) and guidelines (RANG-FW-GDL 09) have been added to require the proper use of salt, water or other feed supplements or facilities that might concentrate livestock or cause trailing.

FW-STD-RCA 11 provides direction for the use of livestock handling facilities and tools to manage and control livestock to meet watershed and water quality best management practices. FW-STD-RCA 12 directs management of livestock grazing to attain desired conditions within Riparian Conservation Areas.

The forest plan monitoring program measures management effectiveness and assesses progress toward achieving or maintaining the forest plan desired conditions and objectives through a set of monitoring questions and associated indicators (final plan, chapter 4, “Monitoring Program Introduction” section). The indicators were selected using the best available science (see the best available science determination documents for monitoring available in the project record).

Aquatic and Riparian Resources

6105

The draft environmental impact statement reasons that species-targeted planning should be dropped from the proposed plans because it had been determined that none of the willow flycatcher sites on the national forest occurs in an active livestock allotment (draft environmental impact statement, p. 332). However, current evidence of breeding in cattle allotments is not needed for National Forest Management Act requirements to apply. The impacts of the proposed grazing in willow flycatcher breeding habitat, whether occupied or not, is not disclosed.

Response: The forest plan is required to provide ecosystem plan components and as needed, species-specific plan components to provide for the persistence of at-risk species within the plan area over time. The final environmental impact statement (chapter 3, “Wildlife, Fish and Plants” section) includes an expanded discussion of the plan components that are designed to provide for at-risk species. See also response to 9000 for a discussion of forest-wide and species-specific plan components.

The supporting rationale for the consideration of the willow flycatcher as a species of conservation concern concludes there is substantial concern about this species’ ability to persist in the plan area due to water uses from expanding population pressure and human demands, coupled with increasing temperatures and temporal changes in precipitation and runoff events related to climate change. These factors, coupled with small, declining populations that are subject to nest parasitism by brown-headed cowbirds, will continue to put willow flycatcher on the Inyo at risk (see Rationales for Animal Species Considered for Species of Conservation Concern). Livestock grazing allotments may occur within suitable willow flycatcher habitat on the Inyo, but no livestock grazing occurs within known, occupied habitat and was not considered a threat in the rationale for bringing the species forward as a species of conservation concern.

In addition to the ecosystem-level plan components that provide direction to maintain adequate water flow and availability, support ecosystem integrity and resilience, and maintain riparian vegetation components and structural heterogeneity needed for breeding and sustaining healthy populations, the final forest plan includes fine scale plan components specific to at-risk species and their habitats. Plan components for at-risk species and relevant to willow flycatcher, include desired conditions (SPEC-FW-DC 02 & 03, WTR-FW-DC 07; DA-WILD-DC 05); a standard regarding design features (SPEC-FW-STD 01); guidelines that reference recovery plans (SPEC-FW-GDL 01, 03, 04, and 05); and some components ensure species will have connected habitats and refugia (MA-CW-DC 01 and 03, MA-RCS-DC 02).

6106

Regardless of breeding status in allotments, the Forest Service must develop species-targeted plan components, including meadow habitat management guidelines and restoration plans, in order for the species to persist in the plan area. See Loffland et al. (2014) for specific recommendations and scientists' optimism about species persistence in the plan area with the help of active management in specific locations that achieve specific habitat targets.

Response: See also response 6105.

Loffland et al. (2014) was included in the best available scientific information used in the willow flycatcher rationale (see Rationales for Animal Species Considered for Species of Conservation Concern) and impact analysis (see the final environmental impact statement, chapter 3, section on “Wildlife, Fish and Plants”).

The Final Plan direction for riparian conservation area and meadows includes protection of meadow and riparian areas. Also, standard SPEC-FW-STD 01 specifies that design features, mitigation, and project timing considerations are incorporated into projects that may affect occupied habitat for at-risk species. For example, this fine filter standard could provide for protection of large stands of willows. Active management of specific areas identified as within or close to occupied areas are project specific.

In addition, many plan components were designed from approved conservation strategies, assessments, management plans, recovery plans, and other habitat or species-specific documents when proposing and analyzing the consequences of site-specific project activities (SPEC-FW-GDL-03 and SPEC-FW-GDL-04). The guiding documents (some are listed in appendix F of the final forest plan) are expected to be revised, replaced, or supplemented as new scientific information based on new data and reports becomes available over time.

6107

The Forest Service misrepresents the science presented in Siegel et al. (2008) concerning willow flycatcher declines, using it to justify not including restoration of willow flycatcher habitat; therefore, revise the plans to include restoration as suggested by Loffland et al. (2014).

Response: Between draft and final environmental impact statement, the rationales for each species of conservation concern were updated, made more comprehensive, and use the best available science (See Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest). This was used to inform the analysis. For the willow flycatcher, this includes referencing Loffland et al. (2014) and using it and other best available science

information to inform the analysis (see the final environmental impact statement, chapter 3, section on “Wildlife, Fish and Plants”).

See also responses 6105 and 6106 regarding ecosystem and at-risk species specific plan components relevant to willow flycatcher habitat.

6108

The Inyo should prioritize willow flycatcher monitoring on Rush Creek to determine population numbers and nesting success.

Response: The plan monitoring program (chapter 4 of the final forest plan) has been revised to include monitoring question AE02 under the Aquatic Ecosystem category to directly monitoring the functioning of riparian areas. The associated desired condition plan component MA-RCA-DC-05 applies to sustaining riparian habitats for terrestrial fauna, which encompasses willow flycatcher. While this monitoring question does not specify any locations, Rush Creek may be included when the monitoring guide is developed for the Inyo’s plan monitoring program (for instance, when sampling locations and specific methodologies are selected).

6109

Lack of species-targeted plan components is contrary to the Planning Rule's requirement and National Forest Management Act that forest plans provide for the ecological conditions necessary to maintain a viable population of each species.

Response: See response to comments 9000 and 9106.

In the final environmental impact statement, the analysis has been improved to more clearly show how ecosystem plan components provide for the ecological conditions and key threats to persistence for willow flycatcher (final environmental impact statement, chapter 3, “Wildlife, Fish and Plants” section). In addition, plan components for at-risk species have been strengthened.

6110

The analysis identifies an incomplete list of threats to willow flycatcher by excluding grazing from the list of threats to this species.

Response: See response to comment 6105.

Declining meadow condition due to poorly managed livestock grazing is recognized as a general threat (see details in Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest) and there are ecosystem plan components that help alleviate this threat, including RANG-FW-DC 01 through 03, and RANG-FW-STD 04 and 07 (See final forest plan and final environmental impact statement, chapter 3, “Wildlife, Fish and Plants” section). Since livestock grazing allotments may occur within suitable willow flycatcher habitat on the Inyo, but no livestock grazing occurs within known occupied willow flycatcher habitat, livestock grazing is considered a general threat rather than a key threat to persistence for bringing the species forward as a species of conservation concern.

6112

There are no protocol survey results reported in the draft environmental impact statement to indicate that the occupancy status has changed, so the agency must assume occupancy in meadows that have had willow flycatcher detections since 1982.

Response: Information from the best available science on current distribution of the species on the planning unit is detailed in the Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest and summarized in the final environmental impact statement, chapter 3, "Wildlife, Fish and Plants" section.

6113

A comparison of effects on willow flycatcher and habitat among alternatives A, B, C, and D, where surveys are discontinued on the latter 3 alternatives is not disclosed.

Response: See response to comment 6108 regarding monitoring program in the selected alternative B-modified. The effects analysis in the final environmental impact statement, chapter 3, Wildlife, Fish and Plants section has been strengthened.

6114

The dense riparian foliage that willow flycatchers depend on to reproduce and escape nest predation is threatened by permissive range management proposed in the plans, and if willow flycatcher nests occur in active allotments in the future, there are no plan components to protect willow flycatcher in this scenario; therefore, revise the plans with respect to grazing to provide protection for this at-risk species.

Response: If new willow flycatcher nests are discovered in the future, several plan components in the final forest plan would guide evaluation of livestock grazing to determine if changes are needed. A forestwide desired condition for animal and plant species, SPEC-FW-DC-02, describes that ecological conditions provide habitat conditions that improve conditions for species of conservation concern. Another desired condition, SPEC-FW-DC-03, describes that "Land management activities are designed to maintain or enhance self-sustaining populations of at-risk species within the inherent capabilities of the plan area by considering the relationship of activities to species survival and reproduction." If authorized activities, including livestock grazing, are adversely affecting willow flycatcher nest sites, standard SPEC-FW-STD-01 could be used to evaluate changes or alternatives to practices to re-design, mitigate, or alter the timing of grazing activities.

Additional forest plan direction related to riparian conservation areas also would guide decisions on future projects and activities. Desired condition, MA-RCA-DC-02, describes that riparian conservation areas have ecological conditions that support persistence of species like willow flycatcher. Desired condition RCA-MEAD-DC-06 describes, "healthy stands of willow, alder, and aspen are present within and adjacent to meadows with suitable physical conditions for these species."

6115

Develop management areas with suitable willow flycatcher habitat that exclude grazing, redirect recreational activity, and restore or close roads.

Response: Management areas for suitable willow flycatcher habitat were not developed because livestock grazing does not occur within known occupied willow flycatcher habitat on the Inyo National Forest. Livestock grazing, along with recreation activities and roads are considered

general threats. The key threats to persistence of willow flycatcher in the plan area are described in the analysis (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants" section) and detailed in the rationale document (Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest).

6116

Mono Lake willow flycatchers are of particular conservation importance because of their use of tall shrubs away from meadows. This use of atypical habitat may represent a gene pool that may help with species persistence in environmentally extreme conditions. The WTR-FW-GDL 01 should be expanded to cover this atypical willow flycatcher habitat that is not considered aquatic habitat or riparian resources.

Response: The willow flycatcher subspecies found around Mono Lake is identified as a species of conservation concern for the Inyo National Forest. The draft environmental impact statement did recognize the atypical habitat in Lower Rush Creek around Mono Lake and explained some of the restoration that has been occurring in the Rush Creek Bottomlands. The discussion of the habitat used by willow flycatcher in the plan area and the effects of forest plan revision on this species have been expanded and clarified and can be found in the final environmental impact statement, chapter 3, section on at-risk terrestrial wildlife.

The draft forest plan guideline, WTR-FW-GDL-01, was re-evaluated in the final forest plan and part was removed because it is already required or provided for by other regulations and the rest was split into two new components in the final forest plan. The Forest Service has existing authority and responsibility to participate in water use planning, water rights, and relicensing of water facilities on National Forest System lands and did not need to be repeated in the forest plan. Cooperating with others to secure instream flows was broadened to focus on broader watershed restoration, which would include considering instream flow needs and it was more appropriately labeled as a forest plan Goal (WTR-FW-GOAL-01). Finally, recognizing that there are stream diversions or flow modification decisions made outside of regulation by the Federal Energy Regulatory Commission, a new desired condition, WTR-FW-DC-07, was created to focus on instream flows that allow for at-risk species habitat and sustain riparian resources. Since the Rush Creek bottomlands are considered a wide riparian corridor, the plan direction in the final forest plan would apply when collaborating with other agencies to secure in-stream flows needed to maintain, recover, and restore riparian resources.

6117

Prioritize meadow restoration in areas important for willow flycatchers.

Response: There are many factors that will determine the priority of aquatic and riparian restoration activities. One priority considered is given in watershed objective, WTR-FW-OBJ-01, which focuses on restoration of priority watersheds identified by the national watershed conditions framework. Another factor is riparian conservation area objective, MA-RCA-OBJ-01, which emphasizes restoration of riparian areas at the most risk of impact from large-scale high-intensity fire, past fire exclusion, or flooding events.

However, all alternatives also seek to expand the opportunity to increase the amount of aquatic, riparian, and habitat restoration through increased collaboration and partnership with other Federal, state, and local agencies and non-governmental organizations. In the final forest plan, this is shown in Goals for Animal and Plant Species (SPEC-FW-GOAL-01 and SPEC-FW-

GOAL-04); Watersheds (WTR-FW-GOAL-01); and Volunteers, Interpretation, Partnerships and Stewardship (VIPS-FW-GOAL-01, VIPS-FW-GOAL-02, and VIPS-FW-GOAL-03).

6118

Disclose previous survey results and conduct new willow flycatcher surveys in suitable habitat every five years to determine status and habitat condition.

Response: See responses to 6107, 6108 and 6112.

6119

It is important to clearly and specifically identify the purpose of Los Angeles Department of Water and Power agreements for each forest in the planning process. For example on the Inyo National Forest, tributaries to Mono Lake, Lee Vining and Rush Creeks support key habitat for willow flycatcher. Protecting and monitoring populations of willow flycatcher near Mono Lake is essential because the species here display monotypic habitat selection (McCreedy and Heath 2004; Green et al. 2003). Here, willow flycatcher nest in tall riparian shrubs atypically located away from meadows. This population may represent a gene-pool displaying persistence in environmentally extreme conditions that could favor survival in changing climate (McCreedy and Heath 2004).

Response: See response 6116. The uniqueness and importance of willow flycatcher habitat in the Mono Lake area and threats from within and outside the plan area are described in the final species rationale and final environmental impact statement (chapter 3, section on "Wildlife, Fish and Plants"); the latter includes an expanded discussion of the plan components that are designed address threat to at-risk species.

6120

Plan components for critical aquatic refuges do not mention specific habitat conditions to assure the persistence of the willow flycatcher.

Response: The final environmental impact statement (chapter 3, section on "Wildlife, Fish and Plants") includes an expanded discussion of plan components addressing threats specific to at-risk species. For willow flycatcher habitat, there are desired conditions and guidelines for conservation watersheds and riparian conservation areas (final forest plan, chapter 3 "Area-specific Desired Conditions and Management Direction").

6121

The integrative cohesive aquatic riparian conservation strategy from the 2001 and 2004 plan amendments were dismantled. Furthermore, the desired conditions for water flows and watersheds provide no means to judge whether they have been met except for the opinion of the Forest Service. There is a need for stronger standards and guidelines to increase the level of protection for riparian and aquatic habitats and watersheds. This could include conservation or key watersheds.

Response: The aquatic management strategy from the 2004 Sierra Nevada Forest Plan amendment has largely been incorporated into the final plan with updates to reflect a landscape-scale approach and to account for 2012 Planning Rule requirements. While, the draft plan did retain most elements of the 2004 amendment, it was scattered throughout the plan and difficult to grasp as an integrative cohesive strategy; the organization of the aquatic riparian conservation strategy has been clarified in the Final Plan (chapter 2, Introduction to Watershed section). Appendix G to the final environmental impact statement also describes the relationship of these

aquatics plan components and how they form an aquatic riparian conservation strategy. The Inyo Final Plan does include conservation watersheds (final plan, chapter 3, Management Areas – Conservation Watersheds).

6122

Claims that riparian and aquatic habitats are rare and/or impaired are not supported in the plans.

Response: The final environmental impact statement notes that of the 125 watersheds on the Inyo National Forest, 95 are functioning properly, 30 are functioning at risk, and zero are impaired. The habitats are described as rare because the steep topography of much of the Inyo National Forest limits riparian and aquatic habitats to a narrow band along stream corridors.

6123

The plans lack specific guidance (standards and guidelines) on listed aquatic species derived from U.S. Fish and Wildlife Service documentation (including biological opinions, 5-year reviews, and conservation strategies) and some of the information included on species is not accurate. Incorporate into the plans specific fine filter standards for federally listed species.

Response: For federally listed species, the plan includes a combination of fine filter species direction and a goal of implementing recovery actions outlined in recovery plans. Information regarding listed aquatic species has been updated in the final environmental impact statement. Also, we are consulting with U.S. Fish and Wildlife Service on the final plan and will receive a biological opinion that will provide additional information related to federally listed species.

6124

Plans lack adequate fine filter protective standards for aquatic species of conservation concern. The species include foothill yellow-legged frog (Sierra, Sequoia), black toad (Inyo), Fairview slender salamander (Sequoia), Hell Hollow slender salamander (Sierra), gregarious slender salamander (Sierra, Sequoia), Inyo Mountain salamander (Inyo), Kern Canyon slender salamander (Sequoia), Kern Plateau salamander (Inyo), Kings River slender salamander (Sierra, Sequoia), limestone salamander (Sierra (Inyo), and relictual slender salamander.

Response: The Inyo Final Plan provides ecosystem ("coarse filter") plan components, as well as species-specific ("fine filter") plan components that contribute to maintaining a viable population of these species within their range (final environmental impact statement, appendix F, Persistence Analysis). The species-specific plan components include standards, as well as guidelines and desired conditions.

6125

The environmental impact statement inaccurately says that habitat was not found to be a limiting factor for the terrestrial salamander species of conservation concern.

Response: The description for at-risk terrestrial salamanders was updated to more accurately describe threats to these species and relationships to plan components (final environmental impact statement, chapter 3, At-risk Aquatic Species, "Environmental Consequences to At-Risk Aquatic Wildlife Species" section).

6126

Plans did not consider climate change and the impact on aquatic species of conservation concern.

Response: Key threats to aquatic species of conservation concern, including climate change, were considered in the development of the Inyo plan. The Inyo plan provides ecosystem plan components that either provide the ecological conditions necessary to maintain a viable population of aquatic species of conservation concern within the plan area or contribute to maintaining a viable population of these species within their range. Desired conditions, standards, and guidelines where developed that provide for ecological integrity of aquatic systems so they are resilient to climate change. See the final environmental impact statement, appendix F, Persistence Analysis, where all species of conservation concern-related plan components are listed, as well as threats to species of conservation concern.

6127

The plan(s) and draft environmental impact statement did not consider water drafting and water diversion standards to protect aquatic habitat.

Response: Water drafting standards are included in the final plan at: MA-RCA-STD 06; MA-RCA-STD 09; and FIRE-FW-GDL 06. Water diversion standards and guidelines are included in the Final Plan as well: SPEC-FW-GDL 05; SPEC-SG-STD-12; and SPEC-SG-STD-13.

6129

Plans did not address impacts from mechanical fuel treatments on aquatic habitat and species.

Response: Mechanical equipment is not permitted within equipment exclusion zones to protect aquatic habitat (MA-RCA-STD 15).

6130

Need to consider the net benefit of grazing on National Forest System in the Sierra Nevada and reduce or eliminate grazing, particularly in alpine and subalpine areas, around riparian areas, seeps, fens and degraded meadows. [Also noted in Grazing.]

Response: Economic and social effects of proposed grazing direction has been added to chapter 3 under subsection “Benefits to People and Communities.” A description of grazing activities and the associated environmental effects has also been added to this subsection.

6131

Standard MA-RCA-STD 12 regarding fens is unclear. The timing of completing the 5-year schedule and discussion about applying to a percentage and number of fens is unclear.

Response: MA-RCA-STD 12 is now MA-RCA-STD 14 in the final plan. MA-RCA-STD-14 has been modified to clarify the timing associated with completing fen inventories within active grazing allotments.

6133

Guidelines (MA-RCA-GDL) 14-17 that appear in both the Sierra and Sequoia draft plans are omitted from the Inyo draft plan. The draft environmental impact statement fails to provide a science-based rationale for omitting these guidelines from the Inyo.

Response: In reference to MA-RCA-STD 14-17, the Inyo grazing standards and guidelines provide similar and comparable direction for grazing in riparian conservation areas, upland habitats and on trees and shrubs. Additional riparian conservation area standards and guidelines, which pertain to livestock grazing operations, have been carried forward or added. See forest plan.

6134

There has been no integrated look taken at both riparian and upland values, and reduction in grazing disturbance and/or removal of harmful facilities or roading to promote integrated and sound management in this process.

Response: The final plan contains plan components that provide desired conditions for which the Inyo intends to work towards maintaining or achieving and protections for both riparian and upland resources; reduce grazing disturbance; and provide desired conditions and constraints related to facility and road developments and use: see plan components MA-RCA-DC 01 through 11; MA-RCA-GOAL 01 and 02; MA-RCA-STD 01 through 19; MA-RCA-GDL 01 through 07; RCA-MEAD-DC 01 through 08; RCA-RIV-DC 01 through 06; RCA-LPP-DC 01; RCA-SPR-DC 01 through 03; MA-GRA-DC 01 through 08; MA-GRA-GDL 01; MA-CBRA-DC 01 through 08; MA-CBRA-STD 01 through 04; RANG-FW-DC 01 through 03; RANG-FW-STD 01 through 08; and RANG-FW-GDL 01.

6135

Desired conditions for riparian areas and streams do not provide the certainty of designated standards. (MA-RCA-GDL-01) requires a determination of whether "relevant stream characteristics are within the “range of natural variation" prior to any project activity (Sierra Draft Plan, p. 63). Determining Natural Range of Variation (NRV) at the project level circumvents the entire National Forest Management Act diversity framework. NRV need only be determined once, and that should be in the forest planning process. (The plan should also determine which stream characteristics are "relevant"). In addition, treating NRV as a guideline violates the requirement that projects must be consistent with the desired conditions.

Response: This guideline is now a management approach for riparian conservation areas in the final plan. The intention is to describe a strategy to determine when stream restoration is needed; that is, when stream characteristics are outside the range of natural variation.

6136

Best available science information to support aquatic desired conditions is missing.

Response: The final environmental impact statement and the previous assessments done that support the final environmental impact statement provide the best available science information to support aquatic desired conditions. These assessments include the Inyo Forest Assessment, the Sierra-Nevada Bio-Regional Assessment, and the science synthesis (PSW-GTR-247).https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=STELPRD3802842

6137

Objectives for restoration should not merely maintain status quo conditions. The RCA-MEAD-OBJ 01 and RCA-RIV-OBJ 01 should be revised to eliminate maintaining the status quo and focus on enhancing or improving conditions.

Response: The word “maintain” was removed from these objectives in the final plan.

6138

With all springs and meadows, please detail the site characteristics - ranging from type of spring to water flows during low flow periods, and catalogue any changes over time with use of comparative water survey or other information.

Response: The Inyo Forest Assessment assessed stream conditions at the landscape or forest level. Detailed site characteristics are more appropriately identified during monitoring and project analysis.

6139

The desired condition for promoting resilience to fire in riparian ecosystems should be broadened to all natural disturbances. "Promote resilience to fire in riparian ecosystems" to read "promote resilience to all natural disturbance agents in riparian ecosystems."

Response: The final plan includes desired conditions that promote resilience of riparian ecosystems to natural disturbances (MA-RCA-DC-07 and MA-RCA-RIV-DC-01).

6141

More clearly describe the long-term benefits to watersheds and fire resilience that would result from the proposed restoration levels in each alternative. [Duplicate in fire regime]

Response: The Inyo final environmental impact statement was updated to more clearly describe the long-term benefits to watersheds and fire resilience that would result from restoration under each alternative (final environmental impact statement, chapter 3, Aquatic and Riparian Ecosystems, “Water Quality, Water Quantity and Watershed Condition, Environmental Consequences” section).

6142

The intent of priority watersheds and their contribution to restoration and management in the forest plans is unclear; therefore, clarify the intent of priority watersheds.

Response: The intent of priority watersheds and contribution to restoration and management is clarified in a new appendix to the final environmental impact statement (appendix G: Aquatic and Riparian Strategy).

6143

Priority watersheds are not identified in the plan but should be incorporated.

Response: Priority watersheds are designated using the watershed condition framework, a national assessment and reporting tool. Priority watersheds are a short-term tactical approach to restoration and change over time (final environmental impact statement, appendix G, Aquatic Strategy). As a result, they are not identified in the final plan, but the plan includes a link to the national website that maps all priority watersheds (final plan, chapter 2, Watersheds).

6144

Priority watersheds should not be identified in the plan.

Response: Priority watersheds are designated using the watershed condition framework, a national assessment and reporting tool. They are a short-term tactical approach to restoration and change over time (final environmental impact statement, appendix G, Aquatic Strategy). As a result, they are not identified in the final plan, but the plan includes a link to the national website that maps all priority watersheds (final plan, chapter 2, Watersheds).

6145

The critical aquatic refuges analysis was inadequate to provide an appropriate level of protection for these features, plan direction concerning critical aquatic refuges was too general, and some areas that should have been designated as critical aquatic refuges were left out; therefore, make the plan direction more specific and make the analysis more robust.

Response: Critical aquatics refuges are not included in alternative B-modified. They were eliminated because there is adequate species protection without critical aquatic refuges; in addition, plan components for conservation watersheds were created (final environmental impact statement, appendix G, Aquatic Strategy). See the Persistence Analysis for an analysis of how plan components provide the ecological conditions necessary to maintain viable populations of Species of Conservation Concern in the plan area (final environmental impact statement, appendix F).

6147

Trout Unlimited presented an analysis on critical aquatic refuges at several in-person gatherings with forest plan revision regional staffers and submitted the analysis in various stages of scoping. Through email and phone conversation with various Forest Service staffers, the analysis was recognized and Trout Unlimited members were told it would be properly reviewed and incorporated in some capacity in the draft environmental impact statement. However, it was not incorporated in the draft environmental impact statement, as there is no recognition of the continuous contribution best available science information content from Trout Unlimited through scoping comments. Trout Unlimited were recently told at the most recent Region 5 regional forester meeting in August 2016 (where we presented our critical aquatic refuges analysis again) that this was due to staffing changes during the FPR process. We believe that this is not a legally valid reason for exclusion.

Response: Alternative C incorporated many of the critical aquatic refuges presented by Trout Unlimited (final environmental impact statement, volume 3: Maps). We removed critical aquatic refuges from the final plan and included the concept of conservation watersheds, some of which incorporate existing and proposed critical aquatic refuges. To determine what was included in alternative C, we evaluated all the critical aquatic refuges proposed by Trout Unlimited using three filters: 1) Is the proposed critical aquatic refuge watershed substantially located on the Inyo National Forest? 2) Is the species or biodiversity hotspot the critical aquatic refuge is designed to protect located on the Inyo National Forest? 3) Is the scale of the proposed critical aquatic refuge appropriate to protect the habitat of the species or biodiversity hotspot the critical aquatic refuges is designed to protect? Some of the critical aquatic refuges as proposed by Trout Unlimited were not carried forward into action alternatives because they didn’t pass the first two filters. Others were made smaller than proposed since the species in question (Yosemite toad) was only found in certain sub-watersheds, not throughout the HUC-12.

6148

All of the critical aquatic refuges added in alternative C are limited to areas within wilderness areas. The addition of these critical aquatic refuges will have little effect on management since limited management occurs in wilderness areas. Critically important areas in areas outside of wilderness areas, especially in lower elevations, were identified by the public and should be considered.

Response: The critical aquatic refuges included in alternative C were located both within and outside wilderness areas.

6149

Concern that additional critical aquatic refuges, particularly within Inyo County, could limit mechanical vegetation treatments, mining, and motorized recreation.

Response: The Final Inyo Plan includes plan components for Conservation Watersheds and removed direction for critical aquatic refuges in alternative B-modified. Only a small amount of conservation watersheds are within Inyo County, and most of that area is within existing wilderness. Conservation watersheds do not limit vegetation treatments, mining, and recreation access within Inyo County (final plan, chapter 3, Conservation Watersheds).

6150

Opportunities to protect vulnerable aquatic species not pursued in draft plans. Supports more and/or larger critical aquatic refuges than proposed in draft plans.

Response: See response to comment 6145.

6151

Additional critical aquatic refuges are important ways to support the best remaining populations of native aquatic species in the Sierra Nevada.

Response: See response to comment 6145.

6152

Draft plans not clear on criteria for new critical aquatic refuges and why some were only included in alternative C.

Response: See response to comment 6145.

6153

Fish and amphibians cannot serve as pure surrogates for biodiversity for criteria to develop new critical aquatic refuges. Need to include aquatic invertebrates. Need to explain how best available science information was used in the process.

Response: See response to comment 6145. Also, aquatic benthic macroinvertebrates are a focal species for plan monitoring (final plan, chapter 4, Focal Species).

6157

Plan components for critical aquatic refuges do not mention specific habitat conditions to assure the persistence of the federally listed amphibians.

Response: See responses to 6123 and 6145.

6160

The draft environmental impact statement does not adequately address roads within the riparian conservation areas, both existing road system, road density, or permanent or temporary roads required to perform vegetation management at increased pace and scale as proposed (alternative B).

Response: The final environmental impact statement analyzes impacts from roads on aquatic environments and water quality, particularly related to sedimentation. It also considers short-term effects of restoration activities compared to potential long-term benefits. Plan components include direction for avoiding the construction of new temporary roads within riparian conservation areas (MA-RCA-STD 18) and minimizing impacts from designated roads and trails within riparian conservation areas (MA-RCA-GDL 02).

6161

Riparian buffers need to be actively managed to prevent bark beetle tree mortality and act as wicks increasing spread of wildfire to achieve desired condition.

Response: The forest plan allows for management within riparian conservation areas (MA-RCA-DC 08, 09, and 10) and objectives have been incorporated into the plan to address the need to restore riparian areas (MA-RCA-OBJ 01).

6162

Request for exemption to MA-RCA-STD-0720 for recreation areas, livestock crossing or driveways to read "This standard does not apply to developed recreation sites, sites authorized under special use permits, livestock crossings or driveways, and designated off-highway vehicle routes."

Response: The exemption to the revised MA-RCA-STD-07 (new sequence) would apply to areas within destination recreation management areas, authorized under special use permits, and designated off-highway vehicle routes. Since livestock, crossings and driveways are highly variable; they need to be analyzed at the project level on a case-by-case basis.

6163

Request to revise MA-RCA-STD-121 to read "Ensure that characteristics of special features are, at a minimum, at proper functioning condition or [are] functioning at risk and maintaining or trending toward proper functioning condition, as defined in the appropriate technical reports."

Response: The language used in the plan in MA-RCA-STD 13 is consistent with the proper functioning condition language for the assessment of riparian area management (see forest plan, footnote 9 for citation). Systems can either be at properly functioning, functioning at risk, or trending toward properly functioning.

6164

Request to revise MA-RCA-STD-17 to provide for other mitigation measures other than livestock removal such as use of temporary fencing or additional herding.

Response: Standard 12 in the plan provides for flexibility in how livestock grazing is managed within riparian conservation areas (final plan, chapter 3, MA-RCA-STD 12). Measures such as temporary fencing or herding can be used before livestock is removed from the riparian system.

6165

U.S. Forest Service is improperly selecting to protect one species and destroy another by killing resident trout in the Sierra to supposedly protect toad species. This is not supporting aquatic diversity.

Response: The plan provides desired conditions for all animal species, including amphibians and fish species (SPEC-FW-DC 02 and SPEC-FW-DC 05). These desired conditions address the need to provide habitat for federally listed species, species of conservation concern, and sustain both common and uncommon native species. They also address the need to provide for high quality hunting and fishing opportunities.

6165-2

Draft environmental impact statement, table 96, lists off-highway vehicle recreation as a known threat to numerous species of conservation concern. This seems highly unlikely since off-highway vehicle recreation is confined to designated trails and trail tread is a highly unlikely place for plants to grow. The environmental impact statement must remove off-highway vehicle recreation as a threat for any species of conservation concern in table 96.

Response: The table in the final environmental impact statement lists the threats by principal habitat type to plant species of conservation concern based on the best available scientific information (final environmental impact statement, chapter 3, “Plant Species of Conservation Concern” section). This information was determined using NatureServe, the California Natural Native Database and other database information. The threats to plant species of conservation concern can also be found in the Persistence Analysis (final environmental impact statement, appendix F).

6166

Aquatic invasive species are impacting native species negatively and this is not sufficiently addressed in the plan.

Response: The plan includes direction to address invasive species, including aquatic invasive species (INV-DC-01 and INV-STD 01). These plan components address aquatic invasive species specifically and the desire to control or eradicate known populations of invasive aquatic species and prevent the establishment of new populations. The plan also contains a goal to continue to coordinate with the state wildlife agencies in managing for these species (INV-FW-GOAL 01).

6167

Need for reintroduction of beaver is not addressed in the plans; however, beavers create wetlands that are important for other wetland dependent species.

Response: State wildlife agencies are responsible for the management of wildlife species, including beaver and the reintroduction of beaver. Although the plan does not address beaver directly, direction in the plan does not prohibit the state wildlife agencies from reintroducing beaver. The plan does contain language that allows for habitats for common native species to be supported within the plan area (SPEC-FW-DC 02).

6170

Management strategies and educational outreach need to address effects of non-motorized traffic on aquatic species such as the Yosemite toad.

Response: The plan includes language addressing the need to provide for interpretation throughout the Inyo National Forest (VIPS-FS-DC 03). This direction does not provide specifics as to what the interpretation or education materials will be, as that would be determined at the project-level.

6171

Given the lack of scientific information that supports the one-size-fits-all buffer zones, the agency should rewrite the riparian conservation area standards to establish the size of the buffer based upon site-specific and desired conditions, rather than imposing a standard width unsupported by the best science.

Response: The plan allows for adjustments in the widths of the riparian conservation areas, this direction is included in the definition of riparian conservation areas in the introduction to this section (final plan, chapter 3, Riparian Conservation Areas). The adjustment of the widths of these areas would be made at the project-level, as described in the introduction.

6172

Plans lack standards and guidelines for accomplishing specific types of restoration of aquatic systems.

Response: The plan includes objectives for restoration of riparian conservation areas (MA-RCA-OBJ 01), meadows (MA-RCA-OBJ 01), and rivers and streams (MA-RCA-OBJ 01 and 02). The determination of the specific restoration methods would be determined at the project level.

6174

The draft plans discuss the role of partnerships, but need greater emphasis within aquatic strategy plan components. Suggest additions of specific desired conditions, objectives, goals, and potential management approaches to achieve landscape level restoration.

Response: The plan contains two goals that address the need for coordination and collaboration with state and Federal agencies in managing riparian and aquatic systems (MA-RCA-GOAL 01 and 02). Direction for working with partners can be found in the “Volunteers, Interpretation, Partners, and Stewardship” section of the plan (VIPA-FW-DC 01, 03, and 05; VIPS-FW-GOAL 01, 02, 06, and 08). This direction, although not specific to aquatic systems, applies to all types of partnership work.

The suggested plan components to achieve landscape level restoration were project-specific and address the question of how a project would be completed. Forest plans are intended to be strategic and are not tactical. Forest plan emphasize strategic decisions related to “why” and “what”, and to a lesser extent, “when” and “where.” The “how” decision is generally made at the tactical or project-planning level.

Information provided about the existing condition was determined during the Inyo National Forest assessment in 2013 and was deemed sufficient to conduct planning and the analysis.

6176

Riparian conservation area standard 07 includes an exemption for developed recreation sites, sites authorized under special use permits, but it isn't clear if it would also apply to Tribal gathering of forest products or Tribal uses.

Response: The standard in the riparian conservation area section (MA-RCA-STD 07) does not apply to Tribal gathering and Tribal uses.

6177

I remain opposed to the proposed elimination of Sierra Nevada Forest Plan Amendment standards and guidelines 109 and 111, which could be used to enable brush removal in riparian conservation areas. Elimination of these standards and guidelines could be used to enable hand removal of ecologically-valuable willow concentrations in wilderness areas that are grazed by livestock but have more willow bushes than grazing permittees desire.

Response: In the 2004 forest plan amendment, riparian conservation areas standards and guidelines 109 and 111 were specific to fuels and prescribed fire, and wild fire suppression. They were not intended as guidance in grazing management or vegetation type conversion for the purpose of increasing ease and access to herbaceous forage by thinning woody riparian vegetation types. Guideline FW-GDL-RCA 02 emphasizes enhancing native vegetation cover and channel stabilization while limiting soil erosion. FIRE-FW-GDL 04 allows for management of fire within riparian conservation areas where appropriate and FIR-FW-GDL 06-10 provide additional guidance for fire management activities in special habitats, designated wilderness, and sensitive areas.

6179

Riparian conservation areas, standards 07: the exception in this standard is far too wide, includes too many situations, and does not loosen the standard, but rather does away with it entirely. A standard for these excepted areas that requires disturbance from exceeding 30 or 40 percent would be more appropriate. The Pacific Crest Trail Association believes if we can meet the 20 percent standard in the Pacific Crest Trail corridor so should other uses.

Response: Riparian conservation area (MA-RCA-STD) 07 is based on best available science information and seeks to prevent disturbance to streambanks and shorelines of natural lakes and ponds caused by resource activities from exceeding 20 percent of stream reach, or 20 percent of natural lake and pond shorelines.

Issue 1. Developed recreation sites; sites authorized under special use permits; and designated off-highway vehicle routes are valuated under the best management practices. Special use permit have guidance to minimize impacts to streams and lakes that can be tailored to the area and activity. Developed recreation sites are designed to minimize effects of campers on streams and lakes. Well-designed off highway routes can have hardened crossings and many other types of improvements to minimize damage to streams and lakes.

Issue 2. These standards are important as they assist in preventing damage to streams and lakes. These habitats are extremely important in the dry environment of the eastern Sierra. Disturbance to these sensitive habitats would not meet our need to protect species dependent on these systems.

6180

Sequoia plan only; riparian conservation areas, potential management approaches; The current statement is "Trails will be rerouted away from meadows and springs." We believe that meadows are important scenic and wildlife viewing resources that the public will access by inappropriate social trails if responsible system trails are not provided. Trails are how springs are accessed by the public for treatment and use. We suggest the following language: "Trails should be sustainably built to access meadows and springs in a way that protects water quality and ecosystem function while providing public access."

Response: FSH 2309.18 – trails management handbook.

Trails in the context of this potential management approach means official trails listed as National Forest System trails (FSM 2353.12). Definition of a forest trail: A trail wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the National Forest System and the use and development of its resources. Definition of a National Forest System trail: A forest trail other than a trail that has been authorized by a legally documented right-of-way held by a state, county, or other local public road authority.

These are the trails that should not be within meadows or on top of springs as they have caused damage in the past. If an area is important for wildlife, (springs and meadows are) then we have an obligation to protect the hydrology and habitat in these areas. If an area is close to a campground, official trail or day use area; it may be appropriate to design an interpretive trail; but this would be on a case-by-case basis and not appropriate for the forest plan.

While we appreciate the sentiment, the proposed management strategy follows all of our management direction for sustainable recreation, species at risk, and resource protection.

6181

The forest plans lack adequate protection of meadows, and other areas sensitive to damage from grazing; therefore, change meadow strategy to limit or prohibit grazing within wet meadows, fens, and other sensitive aquatic areas; increase monitoring of grazing impacts; and include more restoration of meadows.

Response: The plan provides direction on allowable grazing utilization of riparian conservation areas, including meadows, and other rangelands and habitats. Where it is found to be appropriate or necessary, guidance is given to restrict or remove grazing from a riparian conservation area (FW-STD-RCA 10). Riparian conservation area standards include limits on ground disturbance to streambanks and lake shores (FW-STD-RANG 07), fens (FW-STD-RANG 08) and designated wild trout waters (FW-GDL-RCA 10).

Assessment and monitoring are required under all alternatives including the no-action alternative. Inyo Forest Plan direction requires an assessment of existing vegetation condition and hydrologic function at grazing key areas. Forest Service policy requires monitoring of grazing permit activities and effects to assure permit compliance and consistency with forest plan direction (FSH 2209.13-19, FSH 2209.13-95, and FSH 1909.12-30).

Meadow restoration is proposed to maintain or restore all riparian conservation areas, including meadows, rivers, streams, springs, and seeps to proper functioning condition (FW-DC-RCA). The

objective is to restore up to 500 acres in riparian areas (FW-OBJ-RCA 01), 10 meadow complexes (FW-OBJ-MDW 01), and 20 miles of stream (RCA-RIV-OBJ 01) within 10 years.

6182

Include standards and guidelines, including suggestions previously provided, to address the ecological integrity of meadows and circulate a revised draft environmental impact statement for review and comment.

Response: The plan contains direction for meadows in the riparian conservation area section of the plan (RCA-MEAD-DC 01-08 and RCA-MEAD-OBJ 01). The general riparian conservation area direction also applies to meadows (MA-RCA-DC 01-11; MA-RCA-OBJ 01; MA-RCA-GOAL 01-02; MA-RCA-STD 01-19; and MA-RCA-GDL 01-07). There were no changes for meadow direction between the draft and final plan. We believe that these plan components provide for ecological integrity of meadows (final environmental impact statement, chapter 3, "Aquatic and Riparian Ecosystems" section). We did not issue a revised draft environmental impact statement because the circumstances of tree mortality due to drought and insect infestations were not identified at the same scale as the Sierra and Sequoia National Forests. These two national forests experienced a change in conditions that has not been identified on the Inyo (record of decision, "Decision" section).

6183

The plans do not provide a compelling reason to change standards and guidelines that provided protections for aquatic habitats; therefore, retain protective standards and guidelines (standards and guidelines 90, 91, 92 of the Aquatic Strategy from 2004 Framework), including protections for the important meadow and riparian habitat in the Southern Sierra.

Response: The language from the standards and guidelines within the 2004 Sierra Nevada Forest Plan amendment was converted to meet the 2012 Planning Rule definitions of plan components. The plan components in the final plan capture the intent of the original standards and guidelines and provide protections for riparian and aquatic habitats (final environmental impact statement, chapter 3, "Aquatic and Riparian" section). Any reissued permit would have to adhere to the riparian conservation area direction found in the plan.

6184

Clarify areas where meadow standards would apply and which standard would have precedence where areas overlap (such as montane wet meadows and early seral meadows) and where meadows and range standards are apparently not aligned (for example, MA-RCA-STD-14 and RANG-FW-STD-06).

Response: The meadow and grazing standards in the plan have been reviewed and aligned.

6185

Fully analyze impacts of grazing on bank disturbance, loss of riparian shrub community and drying of meadows (tied to willow flycatcher).

Response: Bank disturbance is minimized by implementing RCA-STD-06, RCA-STD-10 and within all state designated wild trout waters, RCA-GDL-11. The analysis of effects of grazing disturbance with these and other plan components in place is described in the final environmental impact statement (chapter 3, Forest Benefits to People and Communities, "Production Livestock Grazing" section).

6186

Meadow monitoring (key areas) is not adequate to prevent over utilization or to ensure standards are being met.

Meadow conservation requires long-term engagement through monitoring before and after initial actions, and adaptive management in response to monitoring observations and changing conditions.

Response: Meadow implementation monitoring at grazing key areas is a management strategy that is widely accepted and used by management agencies and described in detail in the regional rangeland monitoring guide (Region 5-EM-TP-004).

Assessment and monitoring are required under all alternatives, including the no-action alternative. Existing Inyo National Forest direction requires an assessment of existing vegetation condition and hydrologic function at grazing key areas. Forest Service policy requires monitoring of grazing permit activities and effects to assure permit compliance and consistency with forest plan direction (FSH 2209.13-19, FSH 2209.13-95, and FSH 1909.12-30).

Monitoring before and after actions is part of the ongoing project monitoring and related to grazing permit activities as noted above.

6188

The plans need to be enhanced to provide direction that addresses the combined effects of past management and current and future trends in warming and drying (mostly from climate change). Changed conservation approaches developed by scientists have not been incorporated (Viers et al. 2013).

Response: The plan incorporates direction for watersheds, riparian conservation areas, and conservation watersheds (chapter 2, Watershed Direction, chapter 3, Riparian Conservation Areas and Conservation Watershed Direction). Together, this direction provides for an integrated, forest-wide aquatic and riparian strategy (final environmental impact statement, appendix G). The conservation watershed approach addresses trends in climate change by identifying functioning watersheds that provide for refugia for at-risk species when a stochastic event occurs. The concepts within the Viers et al. 2013 paper regarding increasing the pace and scale of meadow restoration have been incorporated into the objectives for meadows in the plan (RCA-MEAD-OBJ 01).

6189

Plan direction should include specific monitoring and assessment methods and triggers to revise grazing levels associated with erosion, incision, hummocking, water quality impacts, and over utilization of palatable species.

Response: Overall forest plan direction related to assessment methods and triggers related to grazing levels can be found in the revised RANG-FW-STD section. Specific utilization standards are identified, as tables, in the “Rangeland Vegetation Types” section of chapter 2 in the forest plan. In addition, the forest plan amendment 6 to the 1988 forest plan has been moved from the draft forest plan (formerly appendix F) and retained as the Inyo National Forest Supplement to the Pacific Southwest Region’s “Rangeland Analysis and Planning Guide” (Region 5-EM-TP-004) where it can be periodically updated. The Inyo National Forest Supplement includes specific monitoring and assessment methods under the “Watershed Evaluation Criteria and Corrective Action” section.

Separately, the forest plan monitoring program (final plan, chapter 4) was modified to include monitoring questions that address erosion (WS02), riparian function (AE02), and water quality (AE03) in the Inyo National Forest.

6190

Meadow direction does not incorporate work from a collaborative, interdisciplinary effort that is more integrative and would ensure ecological integrity and sustainability for all meadow ecosystem components and processes.

Response: Partnerships are recognized as essential to carrying out the Forest Service mission including related to restoration (see forest plan, appendix C); the plan in no way precludes collaboration related to meadows.

6191

There are not current proposed standards and guidelines that will assuredly move meadows and riparian areas towards desired conditions that are outlined in the "Riparian Conservation Areas" section.

Response: The plan's monitoring program provides several monitoring indicators that address meadow and riparian habitats (final plan, chapter 4, Monitoring). These include monitoring indicators for watersheds (WS01, WS02); aquatic ecosystems (AE01, AE02, AE03), and focal species (FS02). The monitoring plan is designed to determine how forest management is meeting the plan components identified in these sections.

6192

Goals and approaches in the plans are inadequate to increase pace and scale of meadows restoration as agreed to in the Meadows Business Plan. Suggested goals and approaches are outlined: Need to outline a strategy to prioritize restoration within a broad set of goals. Goal 1. The hydrologic and ecologic functionality of meadows will be protected and restored to the desired conditions; Goal 2. Meadow soil resources that are most vulnerable to rapid and unrecoverable loss (fens and wet meadows) are protected; Goal 3. Habitat conditions and ecosystem function will be restored on 30,000 meadow acres by 2030; Goal 4. Stressors affecting the health and integrity of meadows are mitigated from causing further degradation; Goal 5. Regulatory requirements for protecting and restoring meadows are met in an effective, efficient and coordinated manner by 2030; Goal 6. Meadow restoration and protection has occurred with sufficient and broadly available funding sources that include funding for on-going monitoring and adaptive management; Goal 7. Every county within the strategy area has at least one private land owner and/or manager engaged in meadow protection and/or restoration in coordination with this strategic plan; Goal 8. The key role meadow restoration can play in improving the state water security is reflected in State and regional water planning efforts" and outlines a series of approaches to achieve these goals.

Response: Forest leadership is supportive of the need to increase the pace and scale of meadows restoration as outlined in the Sierra Meadows Strategy. The plan includes meadow objectives that align with the increase in pace and scale of these systems (RCA-MEAD-OBJ 01). Since the regional forest leadership signed a memorandum of understanding to support the strategy; these goals contained in the strategy will be supported at the landscape or project level. The plan supports this strategy in that it provides overall desired conditions for meadow systems (RCA-MEAD-DC 01-08). The actions outlined in the strategy would be accomplished at the project-

level and are therefore not included in the plan directly. The plan also includes direction to continue working with partners on restoration efforts (VIPS-FW-GOAL 01).

https://www.fs.usda.gov/detail/r5/news-events/?cid=FSEPRD530176

http://caltrout.org/wpfb-file/sierra_meadow_strategy_full_report_shareable_mid-pdf/

6193

The number of meadows (and riparian areas) planned for restoration in the objectives in each forest plan is too small. The number is inconsequential given the significant number of meadows in need of restoration. Alternative C is the most consistent with the need for restoration.

Response: The Inyo National Forest final plan outlines the number of meadows to take action on within a ten year period following plan approval (RCA-MEAD-OBJ 01). We will continue to rely on partners and outside funding to assist on restoration efforts (VIPS-FW-DC 01 and VIPS-FW-GOAL 01, 07). Meadow restoration is time consuming and labor intensive, potentially limiting the number meadows that can be effectively restored. The plan is also consistent with the Sierra Meadow Strategy and we would continue to work under this strategy.

6194

In lentic, lotic and meadow sites, areas back from the green line must be measured and monitored. Similar standards must be applied in these areas, too. Cross-section monitoring must also take place. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow - yet are critical for protecting and conserving vital watershed values and protecting riparian/meadow areas linked to proper aquatic habitat conditions for native biota. Standards and monitoring of this type are essential to provide sage-grouse brood rearing and recovery of habitat components for species.

Response: Direction on how to conduct riparian monitoring are included in the Inyo National Forest Supplement to the Pacific Southwest Region's "Rangeland Analysis and Planning Guide" (Region 5-EM-TP-004). The plan directs managers to use this supplement in determining vegetation conditions in grazing allotments (RANG-FW-STD 01). See also chapter 4 in the forest plan.

6195

Promote natural healing and revegetation of headcuts to the maximum extent possible by limiting disturbance throughout the watershed. Do not merely dump rocks and boulders into headcuts as this often destroys the potential for any real natural recovery of meadow systems. Use integrated watershed recovery.

Response: The plan provides direction to address issues such as headcuts and limiting disturbance that are causing impacts to riparian systems (RCA-MEAD-DC 01; RANG-FW-STD 01, 02, and 07). The plan does not prescribe any methods for treatments, those are determined at the project-level.

6196

Draft plans provide less protection for meadows than the current plans. Standard 117 requires currently that special aquatic features are assessed and ensured to be at properly functioning condition at minimum.

Response: The plan replaces standard 117 with standard MA-RCA-13. This standard provides the impetus to design projects toward fully functioning conditions.

6198

Adjust timing and duration of livestock use in areas where aquatic, riparian, and wet meadow resources are maintained, protected, or enhanced. Timing should occur when soil conditions are dry (for example, late summer/fall) and result in "light" utilization.

Response: The proposed Inyo National Forest grazing standards (RANG-FW-STD 01, 02, 03) provide for various utilization standards for different grazing systems and intensities on riparian conservation areas rangelands and other terrestrial rangelands. The basis for those standards accounts for range readiness and pre or post-grazing plant growth. Specific range readiness assessment guidance is provided in the Region 5 Rangeland Analysis and Planning Guide (Region 5-EM-TP-004) and is not addressed specific forest plan direction.

6200

Estimate stock capacity based on available area and forage estimates that exclude: wet meadow, riparian areas, perennial and seasonal stream channel and floodplains, seeps, springs, fens, swales and other unique wetted features or areas.

Response: Riparian conservation areas are generally grazing key areas within active allotments. The final plan provides considerable direction on allowable grazing utilization of riparian conservation areas, other rangelands and habitats. Where it is found to be appropriate or necessary guidance is given to restrict or remove grazing from a riparian conservation area (FW-STD-RCA 10). Stocking capacity is determined during project analysis. See also final environmental impact statement, Appendices for Rangeland Suitability Summary.

6201

Provide and maintain exclusion fencing in all actively grazed areas preventing cattle from accessing aquatic, riparian, and wet meadow resources; install fencing surrounding meadow systems that extend to 100-year flood prone areas so that livestock can be managed during sensitive time periods.

Response: FW-STD-RCA 11 provides direction for the use of livestock handling facilities and tools to manage and control livestock to meet watershed and water quality best management practices. FW-STD-RCA 12 directs management of livestock grazing to attain desired conditions within riparian conservation areas.

6203

Provide off-channel water troughs/sources outside of exclusion fencing in all grazed meadow areas.

Response: FW-STD-RCA 11 provides direction for the use of livestock handling facilities and tools to manage and control livestock to meet watershed and water quality best management practices. FW-STD-RCA 12 directs management of livestock grazing to attain desired conditions within riparian conservation areas.

6204

Utilize salting, herding, water developments, fencing and riding, to improve livestock distribution and minimize impacts to riparian/meadow areas.

Response: FW-STD-RCA 11 provides direction for the use of livestock handling facilities and tools to manage and control livestock to meet watershed and water quality best management practices. FW-STD-RCA 12 directs management of livestock grazing to attain desired conditions within riparian conservation areas.

6205

Provide and maintain exclusion fencing in non-grazed areas where aquatic, riparian, or wet meadow areas support sensitive species. Provide and maintain exclusion fencing in key areas of potential ingress from active allotments into rested allotments.

Response: Analysis of the need for fencing to control or exclude livestock is conducted at the allotment project level. If fencing or other structural range improvements is being considered, the potential environmental, social and economic effects of such a project are compared to other management approaches and no action. RANG-FS-GDL 04 provides direction to develop corrective actions to address site specific on-the-ground problems.

6206

Monitor and assess grazing levels to insure that grazed areas are not exhibiting signs of erosion and incision, hummocking, water quality impacts, and over utilization of palatable species.

Response: Assessment and monitoring are required under all alternatives including the no-action alternative. Existing Inyo National Forest direction requires an assessment of existing vegetation condition and hydrologic function at grazing key areas. Forest Service policy requires monitoring of grazing permit activities and effects to assure permit compliance and consistency with forest plan direction (FSH 2209.13-19, FSH 2209.13-95, and FSH 1909.12-30).

6207

Develop a collaborative resource management team for grazing issues that includes botanists, hydrologist, fisheries biologists and other non-range specific experts.

Response: An interdisciplinary team was used throughout the planning process. Collaborative resource management and interdisciplinary teams are convened when we are doing resource management at the project level as well.

6208

Review plan components to assure internal consistency (with range, etc.) using same terminology.

Response: A full review of the plan components was completed between draft and final to ensure consistency and clarity and appropriate edits were made.

6209

Review monitoring program for adequacy to comply with RCA-MEAD-DC-05.

Response: The monitoring program outlined in the final plan (chapter 4) was updated to add monitoring indicators for desired condition RCA-MEAD-DC-05. The associated indicators are to assess rangeland ecological conditions; species richness and diversity, range greenline

monitoring, and vegetation community types within grazed and ungrazed meadows. These protocols can be found within the Inyo National Forest Supplemental to the Pacific Southwest Region's Rangeland Analysis and Planning Guide (USDA Region 5-EM-TP-004). The forest plan monitoring program measures management effectiveness and assesses progress toward achieving or maintaining the forest plan desired conditions and objectives through a set of monitoring questions and associated indicators (final plan, chapter 4, Monitoring Program, "Introduction" section). The indicators were selected using the best available science (see the best available science determination documents for monitoring available in the project record).

6210

Objectives should not simply maintain existing conditions (RCA-MEAD-OBJ-01 and RCA-RIV-OBJ-01) but seek to restore riparian and aquatic ecosystems as stated in MA-RCA-OBJ-01.

Response: See responses to 6192 and 6193.

6211

Heterogeneity, resilience, late seral status of meadows, and meadow-associated species are not defined leaving ambiguous language in the plans, which is inconsistent with policy; therefore, define these terms in the plans.

Response: The terms heterogeneity, resilience, and late-seral status have been included in the glossary in the final plan. Meadow-associated vegetation species are included in the "Rangeland Livestock Grazing" section of the final plan (chapter 2).

6212

The draft plans rely on flawed determinations to evaluate overall meadows condition. The draft forest plans for the early adopter forests state that the desired outcome of rangeland management activities is to "sustain biological diversity and ecological processes" (Sierra draft plan, p. 40; Inyo draft plan, p. 37) and that grazed areas of the forests trend "toward having satisfactory soils, functional hydrology and biotic integrity" (Sierra draft plan, p. 41; Inyo draft plan, p. 37). This assessment determination is incorrect for a variety of reasons…The current study that each forest has cited for determining the current condition of their forest's meadows is work being done by Region 5 range staff in cooperation with University of California-Davis rangelands watershed lab. Using this study for the purpose of determining the overall trend of meadow health is flawed. Other key science references are not considered.

Using the University of California-Davis rangeland watershed lab is utilizing a clearly biased source for analyzing the data that is being collected. After all the documentation that the Pacific Southwest Region has provided on livestock damage to meadows in their general technical reports, it is both biased and legally vulnerable for the agency to have selected a research group with such a clear partiality towards the livestock industry to analyze the data; therefore, use the documentation of livestock damage to meadows that is available from the Pacific Southwest Region general technical reports in the analysis on meadow impacts and to inform the plan components related to meadows.

Response:

The text quoted in the comment is from the rangeland desired conditions (final plan, chapter 2, Forest-wide Desired Conditions, "Rangeland Livestock Grazing" section). As desired conditions, those are the conditions the forest plan strives to accomplish when implementing national forest

management, not an assessment of current conditions. The current conditions of rangelands is discussed in the final environmental impact statement (chapter 3, Forest Benefits to People and Communities, "Production Livestock Grazing, Affected Environment" section) and the Region 5-MB-266 Inyo National Forest Assessment 2012 (chapter 8, "Multiple Uses-Range, Existing Conditions" section). These assessments acknowledge that currently there are some key grazing areas of allotments that are in fair (20 percent) or poor vegetative condition (4 percent). That the meadow key grazing areas have some fair (21 percent) and poor (6 percent) watershed condition ratings. The vegetation and watershed condition ratings were determined using the Inyo National Forest rangeland conditions evaluation process (forest plan amendment 6) in which an interdisciplinary team assesses a meadow complex and associated sub-watershed using both quantitative measurements and qualitative evaluations.

In addition, 42 Forest Service quantitative rangeland condition and trend plots on key area meadows were established between 1999 and 2001. The intent for this monitoring is to measure trend on key use grazing areas over time at the plot level. This specific monitoring is not intended determine status of "overall meadow condition" across a meadow complex and/or sub-watershed. Meadow condition and trend plots were re-read in 2009-1010. Seven percent of those plots show a Fair condition rating with a stable (2 percent) or downward trend (5 percent). This Forest Service analysis was analyzed in partnership with UC-Davis. Findings are described in several recent publications (Freitas et al. 2014, Oles et al. 2017) and on the UC-Davis rangeland watershed laboratory website.

We are unaware of other recent studies or publications that dispute or contradict either the specific data or determinations from the Inyo rangeland conditions evaluation process or the Region 5 meadow condition and trend monitoring program. We do acknowledge that future assessment, inventory and monitoring methodologies (for instance, using remote sensing) will allow us to make more definitive assessments of meadow and riparian areas at the sub-watershed and watershed scale.

In response to comments and because it is more consistent with the intent of the 2012 Planning Rule, the Inyo National Forest rangeland conditions evaluation process (forest plan amendment 6) has been removed from the forest plan document. It is now an Inyo National Forest supplement to the regional Rangeland Analysis and Planning Guide (Region 5-EM-TP-004). It has also been updated by adding current agency methodologies.

6216

Need to retain standard 117 from Sierra Nevada framework to protect meadows and special aquatic features.

Response: The final plan retains the language from the 2004 Sierra Nevada Forest Plan amendment standard 117 in MA-RCA-STD 13. We will still assess the hydrologic function of riparian areas, meadows, fens, and other special aquatic features during rangeland management analysis. The terms in this standard were clarified with citations to the best available scientific information used to determine functioning conditions of these areas. The citations reflect the Inyo National Forest supplement to the Pacific Southwest Region Rangeland Analysis and Planning Guide Region 5-EM-TP-004 and the Proper Functioning Condition User Guide.

6217

Monitoring should be conducted on a greater number of meadows and include the entire meadow condition and not just plots. The measures should include most or all of the meadow conditions and not be limited to plant species composition.

Response: The monitoring we have in place is not intended to determine status of "overall meadow condition" across a meadow complex and/or sub-watershed. We acknowledge that future assessment, inventory and monitoring methodologies (for instance, using remote sensing) will allow us to make more definitive assessments of meadow and riparian area complexes, across a greater number of meadows, at the sub-watershed and watershed scale. The meadow monitoring associated indicators include more than plant species composition, including: rangeland ecological condition; species richness, species diversity, and plant functional groups; range greenline monitoring; and vegetation community types.

Meadow monitoring is summarized in the Final Plan (chapter 4, Forest Plan Monitoring) and it ties meadow monitoring to the meadow monitoring protocol performed under the Inyo Forest Supplement to the Region 5 Rangeland Analysis and Planning Guide (https://www.fs.usda.gov/detail/r5/landmanagement/?cid=FSEPRD558363).

6218

Specific monitoring guidelines should include:

Baseline conditions of all meadows larger than 2 acres in size on each grazing allotment shall be determined within 5 years of the establishment of the plans. Results will be made available to the public within one year of the completion of collecting baseline conditions.

Meadows determined to be non-functional or functional at-risk will be prioritized for restoration, and monitored for 5 cycles every 3 years to monitor whether trend is in the positive or the negative.

25 percent of all allotments will have mandatory monitoring conducted by forest staff every year in at least 25 percent of meadows larger than 2 acres in size within each of those allotments. Meadows that fit those parameters will be chosen at random for monitoring to discourage selective site management by permittees.

The allotments that will have monitoring done will also be chosen at random at the end of the season to encourage compliance by all permittees. No grazing allotment can be monitored more than twice in a 3-year period.

Mandatory monitoring components will comprise of the Standards already outlined in MA-RCL-GDL for the Sequoia and Sierra, as well as follow appendix F (Inyo National Forest):

Response: Determination of restoration priorities is best done at the project level. Meadow monitoring is summarized in the Final Plan (chapter 4, Forest Plan Monitoring). The meadow monitoring associated indicators rangeland ecological condition; species richness, species diversity, and plant functional groups; range greenline monitoring; and vegetation community types, but these monitoring strategies would be applied to grazed and ungrazed meadows. The indicators were selected using the best available science (see the best available science determination documents for monitoring available in the project record). Condition of a portion of the meadows on the Inyo National Forest is discussed in the Inyo National Forest Assessment (chapter 1, "Aquatic and Riparian Ecosystems" section). Monitoring of range impacts is driven

by the Inyo Forest Supplement to the Region 5 Rangeland Analysis and Planning Guide; this planning effort does not countermand existing policy.

6219

Draft environmental impact statement analysis inadequately addresses resource impacts related to grazing on aquatic systems and habitats.

Response: The final environmental impact statement has been updated to account for impacts of grazing on resources, including aquatic resources (final environmental impact statement, chapter 3, Aquatic and Riparian Ecosystems, Environmental Consequences). A section concerning grazing has also been added to the "Forest Benefits to People and Communities" section.

6220

Draft environmental impact statement analysis inadequately addresses or is based on flawed determinations (best available science information issues) to assess ecological site conditions for aquatic habitats.

Response: The aquatic habitat ecological site conditions are discussed in the affected environment section of the final environmental impact statement, and science has been referenced to support the evaluation of the affected environment (final environmental impact statement, chapter 3, "Aquatic and Riparian Ecosystems, Affected Environment" section). The Sierra Nevada Bioregional Assessment and the Inyo National Forest Assessment also discuss existing conditions, and cite science to support the discussion.

6221

Draft environmental impact statement analysis inadequately addresses best available science information that finds grazing does not impact Yosemite toad habitat (University of California research by Allen-Diaz, Tate and Roche).

Response: The draft environmental impact statement and the plan recognize grazing as one factor that could affect Yosemite Toad (see chapter 3, final environmental impact statement, Yosemite toad). A U.S. Fish and Wildlife Service recovery plan is not yet in place, however, the Inyo has adjusted grazing allotment use based on the available information. As a result, there are no active allotments within Yosemite toad critical habitat.

6223

Based on the annual reports Central Sierra Environmental Resource Center has provided to the Forest Service (see the Central Sierra Environmental Resource Center 2015 grazing report here: http://www.cserc.org/wp- content/uploads/2016/06/meadows-2015-report-reduced.pdf), there is extensive evidence that demonstrates that key standards and guidelines that are supposed to regulate the extent that livestock negative affect vegetation and damage meadow hydrological condition are not being met year after year. Though Central Sierra Environmental Resource Center has not directly monitored conditions of meadows and associated aquatic habitats in the Sierra, Sequoia or Inyo National Forest, their monitoring efforts on the Stanislaus Forest (where similar grazing management takes place) demonstrate that grazing activities in high elevation regions of the Sierra Nevada can severely impact meadow ecosystems and processes.

Response: We have reviewed the referenced 2015 and 2016 grazing monitoring reports written by Central Sierra Environmental Resource Center (CSERC) posted on their website grazing

impacts on meadows in high elevation regions of the Sierra Nevada. The final environmental impact statement acknowledges and discloses the potential livestock grazing effects to rangeland ecosystems, particularly riparian ecosystems. Alternative B-modified (revised plan) provides direction specific to riparian conservation areas (RCAs), which include standards for livestock grazing activities that ensure restoration and maintenance of those riparian conservation areas in grazing allotments to desired conditions (for example, MA-RCA-DC 10 and MA-RCA-STDs 08; 10-14; RANG-FW-STD 02, 04).

6224

Increase number of meadows and stream channel restoration in alternative B to level of alternative C (20-25 per decade). [Also noted in Water.]

Response: The intent of having different options in each alternative is to achieve a range of alternatives to compare to each other and the existing condition. Alternative B-modified selected a level of restoration that is reasonable to achieve given limiting factors; however, the decision maker can make changes within the record of decision that selects portions of another alternative as part of the decision (for instance, they could select alternative B-modified but with an increase in the amount of restoration of meadows and stream channels).

6229

The U.S. Fish and Wildlife Service has determined that Yosemite toads are threatened by livestock grazing range-wide. Livestock grazing has multiple direct, indirect and cumulative effects on these amphibians. This includes direct trampling of individual adults, eggs, larvae and froglets; alterations in local hydrology; reduced cover; cattle movement between meadows may transmit infective pathogens such as *Batrachochytrium dendrobatidis* (Derlet et al., 2010) between ponds.

Response: The Yosemite toad occurs on the Inyo National Forest as described in the biological assessment and in the final environmental impact statement, chapter 3, Wildlife, Fish and Plants, “At-risk Aquatic Species” section. However, as a result of working with the U.S. Fish and Wildlife Service, the permitted livestock grazing program was evaluated and adjustments were made to eliminate all livestock grazing in areas occupied by Yosemite toads.

Therefore, in the final plan, species-specific plan components related to livestock grazing and Yosemite toads were not needed.

6227

There is no direction in the draft forest plans defining how and to what extent the site-specific plan should minimize the effects of grazing to Yosemite toad. SPEC-YT-GLD-2 is an indefinable and intangible mitigation measure. The draft environmental impact statement must analyze the effects of SPEC-YT-GLD-2 vs. SPEC-YT-GLD-1 on Yosemite toad, including that SPEC-YT-GLD-1 may never be implemented across the landscape. It cannot be assumed that decisions deferred to the project-level will more effectively minimize adverse effects; such an assumption erodes the very foundation of National Forest Management Act and suggests that forest planning in general serves only to produce theoretical solutions to complex management issues. RANG-FW-STD-3 allows livestock within areas occupied by Yosemite toad larvae throughout the plan area, and in some cases, allows for utilization standards to be exceeded in such areas. The monitoring is flawed as it is highly improbable that systematic monitoring of habitat conditions and population dynamics from a single location within a meadow could produce data capable of revealing a correlation between the effects of grazing and

species decline. The proposed changes to standards and guidelines would require the Forest Service to reinitiate consultation with U.S. Fish and Wildlife Service for changes to the project description that cause effects not considered in the preliminary biological opinion, and outside the purpose and need.

Response: Because there are no active grazing allotments within Yosemite toad critical habitat on the Inyo National Forest, there is no specific plan direction in the Inyo's forest plan. The draft environmental impact statement recognizes grazing as one factor that could affect Yosemite toad (see chapter 3, final environmental impact statement, Yosemite toad). A U.S. Fish and Wildlife Service recovery plan is not yet in place; however, the Inyo has adjusted grazing allotment use based on the best available information. Chapter 4 of the plan discusses indicators used in meadow monitoring; these are not species specific.

6231

In order to contribute to species recovery, we strongly urge that RANG-FW-STD 07 to allow 30 percent utilization in meadows in unsatisfactory condition be removed and that such meadows be required to have grazing exclusion until they have moved to at least mid-seral status.

Response: Past monitoring indicates that many meadow and riparian sites, in low and mid seral meadows will respond positively to light utilization. Additional guidelines have been added (RANG-FW-GDL 04) that require future corrective actions if grazing key areas are not responding to a light utilization strategy and trending towards desired conditions or meeting requirements to achieve desired conditions for other resources (RANG-FW-GDL 09).

6233

A standard or guideline should be developed to require monitoring by Forest Service employees, not ranchers, with clearly defined triggers for the removal of cattle and the revocation of grazing rights if standards or guidelines are exceeded.

Response: Assessment and monitoring are required under all alternatives including the No Action alternative. Existing Inyo National Forest direction requires an assessment of existing vegetation condition and hydrologic function at grazing key areas. Forest Service policy requires monitoring of grazing permit activities and effects to assure permit compliance and consistency with forest plan direction (FSH 2209.13-19, FSH 2209.13-95, and FSH 1909.12-30).

The Forest Service does commit to timely monitoring during and after the grazing period. The permittee is also expected to monitor during grazing utilization levels and move livestock with allowable utilization levels are being reached. Any Forest Service monitoring is subject to fiscal and workload constraints, and monitoring obligations required under Endangered Species Act terms and conditions. There is no requirement or expectation by the agency that all active allotments will be monitored every year.

In 1996, a Memorandum of Understanding for Cooperative Rangeland Ecosystem Monitoring was agreed to by the Forest Service, Bureau of Land Management, Natural Resources Conservation Service and UC-Cooperative Extension. As stated in the Interagency Utilization Monitoring Guide it is these agencies intent to encourage participation by grazing permittees and interested publics using accepted interagency protocols.

Agency direction for administration of permits, including suspension or cancellation of grazing permits due to noncompliance, are issued through national and regional handbook directives [Region 5 FSH 2209.13_10_2009, 16.2].

6235

The plans should incorporate standards and guidelines for pack and saddle stock within areas of special aquatic features and Yosemite toad habitat, and also Sierra Nevada yellow-legged frog occupied sites.

Response: The conservation assessments for the mountain yellow-legged frog (includes the Sierra Nevada yellow-legged frog) and the Yosemite toad noted that no studies have examined this threat on these species, but based on studies in alpine habitats it is reasonable to identify recreational pack stock use as a potential threat.

In many wilderness areas on the Inyo National Forest, there are quotas on the number of visitors with pack stock and on commercial pack stock to manage the level of impacts on wilderness experience and wilderness resources. This functions to inherently limit the extent of impacts to areas that may be occupied by these species.

The final forest plan includes general plan direction that would serve to limit the impacts of pack stock on aquatic habitats and habitats for federally listed species. A desired condition for Animal and Plant Species, SPEC-FW-DC-03, describes that land management activities (which would include pack and saddle stock activities) are designed to maintain or enhance self-sustaining populations of at-risk species considering how activities affect species survival and reproduction. A desired condition for Sustainable Recreation, REC-FW-DC-09, describes that permitted recreation uses (includes guided activities such as commercial pack stock) protect natural resources. A sustainable recreation guideline, REC-FW-GDL-03, requires the use of integrated resource planning to address impacts to at-risk species habitat. A Rangeland Vegetation Type Standard (MA-RCA-STD-08) limits disturbance from livestock and pack stock to fen ecosystems to no more than 15 to 20 percent annually and requires further restriction if the fen is nonfunctional or functional at risk with a downward trend. Additional guidance would apply if a conservation strategy is developed for these species (SPEC-FW-GDL-04) or if the U.S. Fish and Wildlife Service approves a recovery plan (SPEC-FW-GDL-03).

Additionally, since these species are federally listed, site-specific projects would be evaluated and designed to avoid or minimize effects as required by the Endangered Species Act and with consultation with the U.S. Fish and Wildlife Service following agency policy.

6238

Weakening of forest plan riparian protective standards, as is currently being proposed by the Forest Service, will only accelerate further imposition of adverse riparian impacts to this area that is within mountain yellow-legged frog habitat.

Response: The outcomes of implementing the final forest plan within riparian conservation areas are expected to remain relatively unchanged due to a set of desired conditions, goals, objectives, standards, guidelines, that will maintain or enhance habitat conditions within these areas for at-risk species such as mountain yellow-legged frog. The final environmental impact statement (chapter 3 section on Wildlife, Fish and Plants) includes an expanded discussion of the plan components designed to address the key threats to at-risk species. In the final forest plan, critical aquatic refuges have been replaced with conservation watersheds, including desired conditions

MA-CW-DC 01 and 03 to provide high-quality habitat and functionally intact ecosystems, and that drainage connections between floodplains, wetlands, upland slopes, headwaters, and tributaries are intact and provide for breeding, dispersal, overwintering, and feeding habitats for at-risk species. Management direction in riparian conservation areas includes desired conditions, standards, guidelines, objectives and goals. Furthermore, standard SPEC-AMPH-STD 01 has been included in the final forest plan for Yosemite toad and the yellow-legged frogs to prevent impacts from pesticide applications.

6239

On August 25, 2016 the U.S. Fish and Wildlife Service announced it had made its final determination of critical habitat for the Sierra Nevada yellow-legged frog, the Northern DPS of the mountain yellow-legged frog, and the Yosemite toad. The plan should be revised to include desired conditions, and standards and guidelines for livestock grazing in their designated critical habitat.

Response: Final critical habitat was designated by the U.S. Fish and Wildlife Service for these three species in August of 2016 as indicated, which was after the draft environmental impact statement was published. These areas are considered and evaluated in the biological assessment and the information is summarized in chapter 3 of the final environmental impact statement in the section on "At-risk Species."

See response to comment 6229. There is no authorized livestock grazing within occupied habitats of any of these species on the Inyo National Forest.

See also response to 9002 for a discussion about why critical habitats are not identified as management areas in the forest plan.

6240

Yellow-legged frog. Need specific objectives, standards or guidelines to provide management direction for listed or other at-risk amphibian species, or to provide protection for their specific critical habitats.

Response: See response to comment 6239 and 6123.

See response to comment 9000 for a discussion about species-specific plan components.

6241

Inyo Mountains Slender Salamander. In 2012, the Forest Service was petitioned to list the Inyo Mountains slender salamander (*Batrachoseps campi*) under the Endangered Species Act. In 2016, we issued a 90-day finding concluding that the petition presented substantial information that listing may be warranted. The petition identified several threats to the species and its habitat which should be incorporated into the draft environmental impact statement:

Mining. Add language to clarify whether or not mining may be a threat to the salamander and its habitat.

Other potential threats identified in the petition include stochastic events (for example, flash flooding), water diversions, genetic drift, and inbreeding depression. We suggest including these threats.

Response: Between draft and final environmental impact statement, the rationales for each species of conservation concern were updated, made more comprehensive, and use the best

available science (See Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest). The rationales are used to inform the analysis. For the Inyo Mountains slender salamander, key threats to persistence include drying of permanent springs and seeps (groundwater dependent ecosystems) from climate change or other stochastic events; direct mortality due to water diversions (that reduce and alter instream flow hydrology regimes), mining (including suction dredge operations), fire suppression actions (from drafting water pumps), and grazing and water impoundments that reduce current velocities and allow for sediment deposition or loss of springs and seeps (see the final environmental impact statement, chapter 3, section on "Wildlife, Fish and Plants").

6242

Range management effects are not addressed in the draft environmental impact statement under the "Environmental Consequences to At-Risk Aquatic Species" or despite known documented impacts of grazing on aquatic habitats and species. Trout Unlimited's public scoping comments have through the forest plan revision process have continually voiced the need for the Forest Service to address range management impacts on aquatic species and their associated habitats (see our submitted comments on all three early adopter forest assessments, submitted fall 2013; need to change comments, submitted January 2014; revised need to change comments; submitted June 2014).

Response: The final environmental impact statement has been updated to include an analysis of impacts of grazing on aquatic and riparian ecosystems and at-risk aquatic species (final environmental impact statement, chapter 3, "Aquatic and Riparian Ecosystems" section and "Wildlife, Fish and Plants, At-Risk Aquatic Species" section).

6243

There should be no grazing use allowed when native aquatic species have redds or egg masses present (for example, rare fish, toads, frogs).

Response: On the Inyo National Forest, aquatic species of concern include the California golden trout and the mountain and sierra yellow legged frog in areas where there are active allotments. Typically, spawning and egg-laying timing coincides with spring melt-off in their habitats. The timing of this activity occurs one to one and a half months prior to "range readiness", or the time when soils and vegetation is suitable for grazing. All permits contain the language that livestock will not enter the allotment prior to range readiness. This concern is more critical in regions of the U.S. where the presence of snow does not dictate the grazing seasons. This information can be found in the final environmental impact statement (chapter 3, Aquatic and Riparian Ecosystems, "Environmental Consequences" section and "Wildlife, Fish and Plants, At-risk Aquatic Species" section).

6244

California golden trout is listed as a "species of conservation concern" on the Inyo National Forest. However, riparian conservation areas standards, guidelines, goals or other management components do not address protecting or restoring habitats associated with the species. We suggest that California golden trout be added to this standard and all other management components related to at-risk aquatic species.

Response: Between draft and final environmental impact statement, the rationales for each species of conservation concern were updated, made more comprehensive, and use the best available science (See Rationales for Plant Species Considered for Species of Conservation

Concern, Inyo National Forest). The rationales are used to inform the effects analysis found in chapter 3 of the final environmental impact statement, which includes analysis of plan components to provide for persistence. Riparian conservation area plan components apply to the entire riparian conservation area, as well as the specific riparian and aquatic environments contained within them, such as rivers, streams, meadows, springs and seeps. Riparian and aquatic environments also have additional direction specific to each environment. The relationship among watersheds, riparian conservation areas, and riparian and aquatic environments is displayed in chapter 2 of the final forest plan. There are two plan components specific to California golden trout goal (SPEC-GT-GOAL) and standard (SPEC-GT-STD). See the final environmental impact statement for all plan components that support the persistence of California golden trout.

6245

Additionally, the Inyo plan should adopt the following goal from the Sequoia National Forest draft plan: MA-RCA-Goal 01. Continue to coordinate and collaborate with California Department of Fish and Wildlife to implement and re-new the California Golden Trout Conservation Assessment and Strategy in order to improve riparian and stream resources for the golden trout.

Response: In addition to the forest plan, we rely on direction and recommendation of numerous Federal and state agencies to collaborate on the recovery or conservation of species, including California golden trout. The Conservation Assessment and Strategy for the golden trout provides direction and guidance in a cooperative effort among agencies to manage this species.

The final plan does contain a goal that states: Coordinate and collaborate with the state fish and wildlife agencies to address native aquatic species issues, including evaluating management and monitoring needs to address aquatic species requirements across ownership boundaries (MA-RCA-GOAL-01).

Terrestrial Vegetation and Fire

7001

The plans need to be revised to better address management activities that pose threats to plant species and cause harm to native plant communities by not making changes to the number of permitted cattle and not closing unnecessary roads or reducing the acres of land permitted for motorized uses and access. Native plant communities are at risk because of aggressive fire suppression and minimal changes to the timber harvest schedules from historic levels.

Response: See response to comment 7037 regarding plan components that maintain or promote native plant communities.

A consistency review of the Inyo forest plan amendment number 6 for rangeland standards and guidelines was compared to the 2004 Sierra Nevada Plan Amendment. Existing standards were updated with minor corrections to desired vegetation conditions and aligned with Regional guidance of vegetation rating procedures. Adjustments were made where Regional standards were more restrictive or best available science indicated a need to adjust standards up or down. Further discussion can be found in the final environmental impact statement (final environmental impact statement, chapter 3, Benefits to People and Communities, “Production Livestock Grazing” section).

The decision about which roads to include on the National Forest Transportation System was made in the Inyo National Forest's 2009 Travel Management Record of Decision (R5-MB-198a). Any future changes to that system would be made in a project-level decision, not in this forest plan revision.

The final forest plan acknowledges that "wildland fire is a necessary process, integral to the sustainability of fire-adapted ecosystems" (FIRE-FW-DC-03) and assigns Strategic Fire Management Zones across the Inyo National Forest, including fire "restoration" and "maintenance" zones (Management Areas- Strategic Fire Management Zones). An evaluation of timber suitability and management for the Inyo National Forest can be found in appendix D of the final forest plan.

7002

The plan does not contain prioritized any management or designated areas that help to restore or maintain plant community diversity. The plan should include standards or guidelines for project activities and/or management areas that will maintain and restore plant community diversity.

Response: See response to comment 7037. Management areas, including the wildfire maintenance and restoration zones, wilderness, wild and scenic rivers, riparian conservation areas, and critical aquatic refuges, will serve to protect and maintain plant community diversity through the unique area-specific plan components (for example, MA-WMZ-DC-01; MA-WILD-DC-01, -02; MA-WSR-DC-01; MA-RCA-DC-01, -02, -03-11, -15; RCA-MEAD-DC-06, -07; MA-CAR-DC-01). Designated areas, including the Ancient Bristlecone Pine Forest Special Interest Area and seven research natural areas will also serve to protect the unique plant communities that occur within their boundaries.

The forest plan includes direction designed to maintain native plant communities and the diversity of native species under the "Animal and Plant Species Desired Conditions" section (for example, SPEC-FW-DC-01, 02 and 03). In addition, the forest plan includes components for terrestrial ecosystems forestwide and 15 specific terrestrial ecosystem types that occur within the plan area. Many of these components support the conservation of native plants and communities by providing for the integrity of ecosystem function and diversity, for example, by providing for "ecosystem diversity" (TERR-FW-DC-01); utilizing fire as a "key ecological process in fire-adapted ecosystems" that "enhances ecosystem heterogeneity and habitat and species diversity" (TERR-FW-DC-06); maintaining "vegetation [that] is a mosaic of diverse ecological types with native shrubs and grasses" (TERR-XER-DC-01); and "increasing diversity by promoting hardwoods, pines, and native plant species" (TERR-FW-GDL-01).

7003

A plan does not contain objectives that maintain and restore plant community diversity. The existing objectives help to increase heterogeneity and restore species composition that will improve plant community diversity however only in small ecological zones and the actions would be a byproduct of other vegetation types, since plant specific veg types are not listed. The objective should include standards and guidelines that sets forth quantitative targets for achieving a specific mosaic (abundance and distribution) of specific plant communities across the landscape or an objective to restore a

particular plant community to a level of diversity measured by one or more of the diversity indices.

Response: See response to comment 7037 regarding plan components that maintain or promote native plant communities and diversity. The plan contains the following (quantitative) objectives that would either directly or indirectly facilitate maintenance or restoration of plant community diversity: TERR-FW-OBJ-01 (increase heterogeneity and restore species composition); SPEC-SG-OBJ-01 (maintain, improve, or restore sage-grouse habitat to meet habitat desired conditions); INV-FW-OBJ-01 (take action to eliminate invasive species); and MA-RCA-OBJ-01 (restore the structure and composition in riparian areas). Quantitative targets for achieving a mosaic of plant communities across the landscape would be developed and analyzed at the project level, as would project-specific objectives that potentially used diversity indices as a measure of progress toward achieving project objectives.

7004

The proposed plan is missing desired conditions for specific vegetation types and individual plant communities where a description of the total number, distribution, and relative abundance across the landscape are discussed. The three forests have significant plant diversity that needs to be protected. The plan only lists six broad ecological zones across all forests; more plant communities are needed. A sufficient DC for plant community diversity forestwide should, at minimum, address the number of distinct plant communities present, their relative abundance with reference to the natural range of variation, variations within each plant community including genetic diversity, and ability to adapt and migrate in the face of climate change.

Response: Management objectives designed to facilitate vegetation mosaics do not focus on achieving a fixed proportion, amount, number, or distribution of vegetation types or distinct plant communities, which would not support an adaptive or flexible management approach. Rather, forest plan objectives (with quantitative targets) are based on the restoration of natural processes (for example, TERR-FW-OBJ-02; Restore fire mosaics using prescribed fire) and vegetation structure and composition (for example, TERR-FW-OBJ-01; Increase heterogeneity and restore species composition) that promote vegetation mosaics and diversity. The final plan (chapter 2, “Terrestrial Ecosystems and Vegetation” section) includes plan objectives for eleven ecosystem types, two ecological zones, and two forest states (old forest and complex early seral), which sufficiently capture the range of major vegetation types on the Inyo National Forest. A mosaic of these vegetation types across the landscape and species diversity within them is supported by several plan components including TERR-FW-DC-01 and 04 (mosaic of vegetation conditions and types for ecosystem and habitat diversity), and vegetation-specific desired conditions (for example, TERR-PINY-DC-01; mosaic of pinyon-juniper types). Specific desired conditions for seral class diversity is provided in the table entitled “Amount of seral stage patches (greater than 10 acres) by vegetation type at the landscape scale (tens of thousands of acres).” Additional quantitative targets pertaining to vegetation diversity, relative abundance of plant communities and their distribution would be developed and analyzed at the project level. The final plan is intended to be flexible in order to adapt management to changing conditions, such as climate change and the need for species migration (final plan, chapter 1, “Adaptive Planning” section).

7005

Plant conservation area (PCA) management areas could be used to protect and restore populations of crop wild relatives, edibles, restoration gene pools, plants used for medicinal and cultural purposes, and plants at risk from a variety of stressors including

climate change, overharvesting, logging, grazing, mining, road construction, intensive recreation, invasive species and wildland fire management. Plant conservation areas could also include corridors to ensure that plant communities have adequate levels of genetic interchange and room for migration to adapt to climate change.

Response: The recommendation for a new type of management area called a "plant conservation area" is not necessary because we already use the designations of botanical special interest areas (SIAs) and research natural areas (RNAs) to accomplish the same objectives. Botanical special interest areas are designated for the maintenance, protection, or restoration of unique and rare native plant populations. Research natural areas are designated for the maintenance and restoration of unique or representative plant communities and other natural resource values. The Inyo National Forest currently contains one designated special interest area (for the Ancient Bristlecone Pine Forest) and seven research natural areas. The plan also identifies special habitats as a type of terrestrial ecosystem; these are generally small-scale habitat or vegetation types that may support unique assemblages of native plants and animals. Plan components have been developed specifically to maintain these plant communities on the landscape (final plan, chapter 2, "Terrestrial Ecosystems and Vegetation" section, TERR-SH-DC-01, -02; TERR-SH-STD-01).

Plan components (final plan, chapter 2) that support the use of plants for cultural or medicinal use include TERR-FW-DC-08 (landscape provides edible and medicinal plants and botanical resources for commercial, tribal, personal, educational and scientific uses), TRIB-FW-DC-03 (Native American access for plant gathering), SPEC-FW-DC-01 (sustainable populations of native and desirable non-native, plant and animal species), and SPEC-FS-DC-05 (opportunities to experience, appreciate and learn about the Inyo National Forest's wildlife, fish and plant resources). Connectivity of native plant populations within plant communities is supported by several plan components including TERR-FW-DC-04 (landscape provides habitat and connectivity for a variety of species), TERR-OLD-DC-02 (landscape provides habitat and connectivity for a variety of old forest-associated species), TERR-CES-GDL-01c (restoring forested habitat to deforested areas, including restoring connectivity), and TIMB-FW-GDL-03 (reforestation of deforested lands should be considered when forest cover could contribute to restoring connectivity).

7006

The desired conditions that are quantitative and specific for some vegetation types (for instance, targets for species and sizes of trees, sizes and types of snags, the amount of seral stages) need to be replicated for other vegetation types, such as meadows and special habitats. This will help manage the forest in an adaptive manner. The monitoring standards, goals and objectives, and detailed targets for achieving a forest with the described desired conditions are weak.

Response: Desired conditions for unique vegetation types (for example, meadows, special habitats) are covered in multiple sections of the forest plan, including the meadows section of riparian conservation areas (MA-RCA-DC-01 through 08) and sage-grouse habitat (SPEC-SG-DC-09), and the "Special Habitats" section (TERR-SH-DC-01 and 02). Special habitats have relatively few desired conditions, because these habitats are uniquely affected by different management activities, exhibit specific trends in ecological condition, and respond differently to disturbances and stressors. Consequently, these habitats are challenging to address comprehensively at the national forest scale, as noted in the "Special Habitat" section of the forest plan and final environmental impact statement. Nevertheless, we added an additional desired

condition (TERR-SH-DC-03), goals (TERR-SH-GOAL-01 and 02), and potential management approach to the final plan to provide additional management direction for special habitats.

7007

The desired condition tables (for instance, title says amount and not proportion) for seral stages are confusing. The minimum patch sizes (for instance, in title patches greater than 10 acres) in the title. There is no method specified for estimating. The intent and measurement method need to be specified.

Response: The table entitled "Amount of seral stage patches (greater than 10 acre) by vegetation type at the landscape scale (tens of thousands of acres)" in the forestwide desired conditions section of the forest plan has been changed so that "proportion" is substituted for "amount" to avoid confusion in terms. The method for estimating these proportions is based on the California Wildlife Habitat Relationships (CWHR) system that is described as footnotes in this table.

7008

The plan direction for desired vegetation structure include broad ranges of basal areas (between 20-200 square feet basal area) for tree density. There is no direction that ensures that the low range will not be managed for when projects are designed.

Response: The forest plan contains a number of plan components that ensure that forest stands will be managed for broad basal area ranges rather than for consistently lower ranges. These include but are not limited to TERR-FW-DC-01 (Each vegetation type contains a mosaic of vegetation conditions, densities and structures), TERR-FW-DC-03 (landscape contains a mosaic of vegetation types and structures that provide habitat for a variety of species), TERR-DMC-DC-03 and 04 (dry mixed conifer tree density varies with topography with areas of high and low basal area), TERR-MJF-DC-03 (variable tree densities in Jeffrey pine forest), and TERR-RFIR-DC-05 (variable tree basal area in red fir forests). In combination, these and other desired conditions (for example, TERR-OLD-DC-03 and 04; number and density of old trees vary by topography and soils) provide consistent plan direction for the management of heterogeneous conditions across forest landscapes with respect to tree densities, basal area, canopy cover, and other structural features.

7009

The plan is inconsistent in identifying the desired basal area per vegetation type. In chapter 2, the desired basal areas by vegetation types are given on pages 19-23 [of the Sierra Plan] and look reasonable. However, looking further within 32the document, the Standards and Guidelines given for specific species or vegetation types often exceed desired condition basal areas, with no recognition of current or expected mortality, or the effect of large planned ignitions which result in no retained basal area.

Response: forest plan standards and guidelines do not contain specific basal area values. Consequently, the basal area values provided in chapter 2 (desired conditions) of the forest plan are not inconsistent with other plan components provided in chapter 4: Design Criteria (standards and guidelines) or other sections. Tree mortality associated with drought, insects, pathogens, warming climate, and wildfires on the Inyo National Forest are recognized in the forest plan in several sections, such as forestwide desired conditions (TERR-FW-DC-02), red fir and lodgepole pine (TERR-RFIR-DC-04), and the Old Forests introduction. In addition, the forest plan monitoring program includes several monitoring questions and indicators that evaluate patterns of tree mortality associated with drought, climate change, and other stressors (see "Terrestrial Ecosystems" and "Climate Change" and "Other Stressors" sections of chapter 4 in the final plan).

Such information will document whether desired conditions for tree basal area will be met under current or future tree mortality events associated with interacting stressors.

7011

Specific questions about plant community diversity is not addressed in the analysis and needs to be addressed. Plant community diversity is relevant at three basic scales: (1) across the landscape; (2) within the plant community itself, and (3) in the range of genotypes within individual species. These aspects of plant community diversity can be measured in a variety of ways with well-established methods and metrics.

Response: Plant diversity is addressed in the "Terrestrial Ecosystems" section of the final environmental impact statement and the Terrestrial Vegetation Ecology Supplemental Report. This includes the analysis of plant diversity across the landscape and within individual communities.

Genotypic variation within individual plant species is not analyzed in the final environmental impact statement; however, it would be considered in the conservation of at-risk species and has also been identified as a consideration when selecting plant materials for revegetation (INV-FW-GDL-04).

7015

Biological Soil Crusts

Plan components need to be improved including: TERR-XER-STD-01 (p. 97) - Include sagebrush and pinyon-juniper habitats, which also contain fragile biological soil crusts.

Response: Plan components have been added to address protection of biological soil crusts in sagebrush and pinyon-juniper habitats (TERR-SAGE-GDL-02 and TERR-PINY-GDL-02). This is to ensure that biological soil crusts contribute to soil stability, nutrient cycling, and resistance to annual grass invasion in sagebrush and pinyon-juniper ecosystems (for example, Pyke et al 2015).

7016

Plan direction should include greater emphasis on native seed to support all restoration activities. Native seed will be most resilient to climate change and should be locally sourced. Plan direction should be modified to: TERR-FW-GDL-04 (p. 101) - Where feasible, projects should exclusively use native seed species appropriate for the project area.

Response: Use of native plant seed for restoration is addressed in plan component INV-FW-GDL-04. This component was revised to emphasize the preference for the use of native, genetically appropriate plant materials: "To the extent feasible, plant and seed materials used for revegetation, restoration and rehabilitation projects should be native, genetically appropriate to the site, and capable of becoming established, in order to restore natural species composition and ecosystem function."

7017

The amount of restoration in sagebrush is trivial compared to the thousands of acres in need that are already infested by invasive grasses. The amount needs to be increased.

Response: The amount (acres) of restoration treatment in sagebrush (sage-grouse habitat) is 1,500 - 14,900 for alternative B-modified (final environmental impact statement, chapter 3, "Agents of Change" section). Alternatives C and D include additional acres of restoration in

sagebrush (sage-grouse habitat) (7,450 - 22,350 acres; (final environmental impact statement, chapter 3, "Agents of Change" section). The effects of the range of proposed treatment amounts is described in the final environmental impact statement under chapter 3, Revision Topic 2: Ecological Integrity, and the amount of restoration acres proposed is considered obtainable and within the fiscal capability of the Inyo National Forest. However, restoration in sagebrush is designed to remove encroaching conifers, use prescribed fire to break up the continuity of fuels therefore reducing the risk of larger wildfires, or create heterogeneity, and not necessarily to eradicate invasive grasses. Tradeoffs between restoration treatments and invasive grass expansion are discussed in the final environmental impact statement (chapter 3, Revision Topic 2: Ecological Integrity, Terrestrial Ecosystems" section, "Terrestrial Vegetation Ecology," "Environmental Consequences," "Mechanical and Prescribed Fire Treatments: Eastside Shrublands and Woodlands" sections). Strategies to minimize introduction and further spread of non-native invasive species such as cheatgrass, as well as efforts to treat invasive species where effective methods exist, are included in the forest plan (final plan, chapter 2, "Ecological Sustainability and Diversity of Plant and Animal Communities" section, "Invasive Species" section).

7018

The monitoring needs to address changes in vegetation in relation to natural range of variation for changes in climate change, altered fire regimes, and exotic species (nonnative grasses).

Response: The plan monitoring program does include a section devoted to climate change and other stressors. In this section, there are monitoring questions and indicators specifically associated with vegetation changes in high elevation forests (subalpine, red fir) that have a high vulnerability to climate change. Altered fire regimes are also covered in this section of the plan monitoring program, including one question that specifically addresses potential fire regime changes with warming climate. The expansion of nonnative annual grasses is covered under the "Focal Species" section of the plan monitoring program. Additional monitoring questions and indicators focused on vegetation changes associated with stressors and other agents of change are included in the Terrestrial Ecosystems" and "Aquatic Ecosystems" sections of the plan monitoring program (final plan, Plan Monitoring Program, "Terrestrial Ecosystems," "Aquatic Ecosystems," and "Climate Change and Other Stressors" sections).

7019

The plan needs to make the plan components and management direction to improve and maintain habitat connectivity clear and easier to follow. There are places where habitat connectivity for wide-ranging forest species (bear, deer, fisher) and sagebrush obligate species (sage- grouse and other sagebrush-dependent species) is analyzed in the draft environmental impact statement, the relationship between these components and draft environmental impact statement are unclear, improving that relationship would be helpful.

Response: The final plan has been re-organized to group plan components for each resource area together (final plan, chapter 2) as opposed to being spread across several chapters (as in the draft environmental impact statement). In addition, many components have been revised to improve clarity.

The final plan contains management direction within the Terrestrial Ecosystem and Vegetation section of chapter 2 that addresses habitat connectivity and providing for improvement of

connectivity for wide-ranging forest and sagebrush obligate species (TERR-FW-DC 06; TERR-OLD-DC 02; TERR-SAGE-DC 04; TERR-SAGE-GOAL 1b, TERR-CES-GOAL 1c). The analysis in the final environmental impact statement chapter 3 (Terrestrial Ecosystems, Terrestrial Ecosystem Processes and Functions, "Landscape Connectivity" section) has been improved and connections between the effects analysis and the plan components addressing habitat connectivity were included in response to this comment.

7020

Plan direction on "restoration treatments" is too vague and general. The direction needs to be more specific. The plan is unclear how and who would conduct restoration, and whether after restoration treatments area completed if forest conditions will continue to degrade because of climate change.

Response: See response to comment 7043 regarding the definition of ecological restoration in the forest plan.

See response to comment 7042 for a discussion of plan components that provide clear ecological restoration objectives for the forest plan.

See response to comment 7044 for details related to the analysis of vegetation condition in the plan area resulting from the combined effect of ecological restoration treatments, altered fire regimes, and climate change.

7021

The objectives within the plan for invasive plant eradication and control are too low compared to vegetation restoration overall. There needs to be additional invasive species areas treated to keep up with the increased overall restoration. This should be coordinated with the tribes using traditional ecological knowledge where possible. This would benefit understory composition, in part through restoring fire with prescribed fire.

Response: Objectives for treatment of invasive species are not correlated one-to-one with acres of vegetation restoration treatment. The invasive species objective within the plan (take action to eliminate invasive species on 800-1,000 acres; INV-FW-OBJ-01) would be focused on those species for which effective treatment options exist, and the population extent and location indicate a high likelihood of treatment success. For vegetation restoration projects, strategies to minimize introduction and further spread of non-native invasive species (including exotic annual grasses like cheatgrass) would be incorporated during project planning and implementation (SPEC-SG-STD-01, -03; SPEC-SG-GDL-04, -06; INV-FW-GDL-01 to -06) but these minimization approaches are not quantified in the "800-1,000 acres." Coordination with Tribes for land management activities is addressed in plan components (for example, TRIB-FW-GOAL-01; INV-FW-GOAL-01, -02; FIRE-FW-GDL-03) and would also occur at the project-level. The plan also recognizes the importance of fire (both prescribed fire and wildland fire use) as a natural and necessary process on the landscape (for example, FIRE-FW-DC-02, -03, -05; FIRE-FW-OBJ-02, -04, -06).

7022

Plan direction for large diameter trees needs to reflect the drier conditions and slower growth to help support more at risk species and aid the recovery of development of currently listed SCC plant and animal species. Change: We offer the following changes

to Terrestrial Ecosystems: *TERR-FW-STD-01 (p. 97) - 30'-inch diameter limit should be changed to all 24'-inch diameter trees and most 20'-inch diameter trees.

Response: See response to comment 7284 for a discussion of diameter limits by alternative and plan components under the forest plan that protect and retain large diameter trees, including in eastside old forest ecosystems that reflect generally drier conditions. This response addresses the protection and retention of large trees that support habitat for at-risk species.

7023

The plan should include old forest emphasis areas in eastside landscapes.

Response: The forest plan contains seven desired conditions (TERR-OLD-DC-01 to 05) and four guidelines (TERR-FW-GDL-01 and 02; TERR-OLD-GDL-01 and 02) that provide management direction for the protection and enhancement of large and old trees in old forest landscapes. This management approach provides a much more flexible and adaptive approach to managing old forests in eastside forest landscapes than the designation of static, old forest emphasis areas (as described in the Sierra Nevada forest plan Amendment of 2004). The evaluation of old forests by alternative is covered in the Old Forests subsection ("Terrestrial Ecosystems" section) and the Old Forests Supplemental Report of the final environmental impact statement. This evaluation includes a comparison of alternatives with old forest emphasis areas (alternatives A and C) and those with old forests with plan components for the protection and retention of large and old trees and promotion of old forest resilience (alternatives B and D).

7024

New plan components need to detail complex seral stage requirements (for example, 10 percent of each seral stage represented) and snag density and recruitment requirements.

Response: The final plan provides plan components that contribute to seral stage complexity in forest ecosystems (table 1). The final plan also includes plan components that contribute to structural complexity including variable densities of snags, logs, trees, and understory vegetation (TERR-FW-DC-01 and 04, TERR-FW-DC-06, TERR-DMC-DC-01 and 02, TERR-MJP-01 to 07, TERR-UPPR-DC-01 and 02, TERR-RFIR-DC-01 to 07, TERR-LDGP-DC-01 to 09, TERR-FW-GDL-01, and TERR-FW-OBJ-01). These plan components and others provide a comprehensive approach to managing for seral stage and structural complexity in forest ecosystems, whereby complexity is an explicit restoration goal in all forest types, seral stages, and spatial scales.

7025

Logging: The forest plan should not allow for cutting of old growth Eastern Sierra trees, specifically trees equal to or greater than 24 inches diameter. There should be a limit to cutting of burned old growth trees to preserve the trees for black backed woodpecker.

Response: See response to comment 7284 for a discussion of diameter limits by alternative and plan components under the forest plan that protect and retain large diameter trees, including in eastside old forest ecosystems that reflect generally drier conditions.

The final plan includes components to address post-fire forest management in the "Complex Early Seral Habitats" sub-section (chapter 2, "Terrestrial Ecosystems and Vegetation" section).

These components are designed to provide sufficient habitat for fire-dependent species such as the black-backed woodpecker.

7026

The plan and draft environmental impact statement should only recommend hand cutting juniper based on careful, targeted, well-studied site-specific areas that have been clearly identified based on science as essential for sage-grouse restoration (Inyo National Forest-specific response)

Response: The plan components for sage-grouse habitat restoration broadly address the removal of encroaching conifers (chapter 2, "Terrestrial Ecosystems and Vegetation" section and "Animal and Plant Species" section) but do not prescribe specific methods or locations. Method and location of tree-removal in sage-grouse habitat would be further analyzed at the project level.

The final environmental impact statement cites recent comprehensive scientific literature reviews and management strategies directed at restoration of greater sage-grouse habitat (final environmental impact statement, chapter 3, Revision Topic 2, Wildlife, Fish, and Plants, "At-Risk Terrestrial Species" section).

7027

The analysis of sagebrush and pinyon-juniper ecosystems underestimates the amount of potential transition to other vegetation states, especially nonnative invasive grass systems. The effect on resilience is not sufficiently addressed.

Response: The final environmental impact statement (final environmental impact statement, "Terrestrial Vegetation Ecology" and "Terrestrial Ecosystem Processes and Functions" sections, "Eastside Vegetation Types" subsections) does document the potential for sagebrush and pinyon-juniper woodlands to convert to a nonnative annual grass-dominated ecosystem, especially in areas of too frequent fire that disrupts natural succession that generally favors sagebrush, pinyon, juniper, or other native plant recruitment post-fire. Additionally, the implications of restoration treatments on arid shrubland and woodland invisibility by nonnative annual grasses and general ecosystem resilience to wildfires, climate change, and other stressors are discussed in these sections.

7028

The plan is inadequate and incorrect in the approaches discussed to restore great basin ecosystems. There is no evidence that thinning sagebrush communities or eradicating exotic annual grasses are effective. In the draft environmental impact statement these are described as effective.

Response: Management approaches and their objectives in Great Basin ecosystems are covered in the final environmental impact statement (final environmental impact statement, Terrestrial Ecosystems, Environmental Consequences to Vegetation Composition, Structure, and Resilience, "Mechanical and Prescribed Fire Treatments: Eastside Shrublands and Woodlands Zone" section; final environmental impact statement, Fire Ecology Specialist Report, "Analysis Findings, Eastside" section). We clarified in the Terrestrial Ecosystems section of the final environmental impact statement that restoration and fuel reduction treatments in sagebrush ecosystems may be effective at reducing the abundance or occurrence of non-native plants, including invasive annual grasses such as cheatgrass (with supporting best available science information references). In addition, the plan includes several plan components ("Invasive Species" section, including desired conditions, objectives, goals, standards, guidelines, potential management approach) that would be incorporated into project plans and implementation to minimize new introductions and reduce the amount of project-facilitated spread of exotic annual grasses such as cheatgrass.

7029

The draft environmental impact statement is lacking in information on the current condition with increased nonnative plant invasion following recent fires. It is critical to monitor vegetation for these changes following fires.

Response: A discussion of the current condition of non-native invasive plants and the relationship with fire is found in the Inyo National Forest Assessment (document R5-MB-266) in chapter 3: Assessing System Drivers and Stressors. The forest plan monitoring program includes cheatgrass and red brome as focal species for monitoring desired conditions in sagebrush and pinyon-juniper ecosystem types, using spatial extent (acres) and cover (percent) as indicators. Forests may also conduct post-fire monitoring and treatment for invasive plant species following national policy for the burned area emergency response program (FSM 2523- Emergency Stabilization- Burned Area Emergency Response (BAER)).

7030

The best available science information and assumptions about natural range of variation for vegetation and fire regimes in the draft environmental impact statement to analyze vegetation and effects of climate change are flawed. The analysis needs to be revised.

7031

Natural range of variation for eastside arid ecosystems is biased toward the agency's fire regime condition class modeling, state and transition modeling, and grazing industry. Underlying assumptions and fire return intervals are wrong. Fuel treatment rationale is wrong.

Response: Natural Range of Variation information for fire return intervals and fuel levels for eastside ecosystems provided in the final environmental impact statement is based on a variety of best available science information sources, including historic data, contemporary reference data, quantitative models (for example, state and transition, ecological process models), and other relevant information (for example, historic accounts). These peer-reviewed best available science information sources are cited in the Terrestrial Ecosystems section and citations are provided in the References section of final environmental impact statement.

The Fire Climate Supplemental Report of the final environmental impact statement also provides additional details regarding assumptions about the relationship between fuel loads and fire intensities. The best available science information supporting this statement is provided in the "Assumptions" section of this report. The fire climate analysis results of this report also support the trend of reduced fire extent and severity within landscapes containing higher proportions of low fuel conditions.

7032

Best available science information related to current or likely foreseeable impacts from climatic changes should be incorporated into the discussion, modeling, and planning related to the natural range of variation for sagebrush ecosystems. Climate change and associated changes in water availability, vegetative structure, and species composition should not merely be framed as a separate challenge needing separate planning, rather as a necessary and critical component of the natural range of variation. Natural range

of variation cannot merely be based on arbitrary, point-in-time historical reference conditions.

Response: The "Terrestrial Ecosystems" and "Agents of Change" sections of the final environmental impact statement does incorporate climate change in the discussion of Best Available Science Information (best available science information) for the natural range of variation in sagebrush ecosystems. This includes the presentation of fire-climate projections under different restoration treatment scenarios in sagebrush ecosystems (Fire Trends section), projected changes in sagebrush distribution resulting from climate change and other stressors (for example, cheatgrass invasion; "Terrestrial Vegetation Ecology" section), and the climate vulnerability of sagebrush ecosystems ("Climate, Ecological Vulnerability and Adaptation" section). Many of these sections in the final environmental impact statement reference Slaton and Stone (2013b), which provides a summary of natural range of variation best available science information relevant to sagebrush ecosystems in the planning area, including the implications of climate change for the natural range of variation in sagebrush.

7034

The draft environmental impact statement analysis overemphasizes historic grazing as an impact on sagebrush vegetation. The analysis does not reflect the current chronic grazing disturbance that incrementally impacts remnant areas. The analysis does not reflect that grazing slows recovery or explain how other "threats" exacerbate the problem.

Response: In response to this comment the final environmental impact statement analysis on sagebrush vegetation was improved, as the analysis now addresses proposed grazing management, not just focusing on historic grazing impacts, and the general effects grazing can have on sagebrush systems (final environmental impact statement, chapter 3, Revision Topic 2: Ecological Integrity, "Sagebrush" section).

7035

The analysis does not address the role of livestock grazing in: dispersing cheatgrass seeds, eliminating or suppressing perennial grasses, causing mechanical destruction of biological crusts, and paving the way for more cheatgrass invasion in grazed areas.

Response: In response to this comment the final environmental impact statement analysis was improved and now includes an analysis of the effects of livestock grazing on the dispersal of cheatgrass seed and other influences on vegetation and biological soil crusts (final environmental impact statement, chapter 3, Terrestrial Ecosystems, "Terrestrial Vegetation Ecology" section; Benefits to People and Communities, "Production Livestock Grazing" section).

7036

It is unclear why there are frequent references to Ponderosa pine, as it is infrequently found in the eastern Sierra forest. It is also unclear why there aren't more references to Western white pine (and white pine blister rust, only on p. 122, Monitoring) and mountain hemlock, as there are many higher elevation instances of these species of large, old-growth individuals in the eastern Sierra.

Response: References to ponderosa pine have been removed in the final environmental impact statement and the final plan for the Inyo National Forest because this tree species is virtually absent from the Inyo.

The plan monitoring program climate change questions and indicators (first row under table heading entitled “Monitoring questions and associated indicators that measure changes on the plan area resulting from climate change and other stressors”) includes a monitoring question for high elevation conifers: “Are high-elevation white pines and red fir being sustained or increasing across the landscape with climate change?” This monitoring question does include all high-elevation white pines in the planning area (for instance, western white pine, whitebark pine, foxtail pine, Great Basin bristlecone pine, limber pine) as well as red fir. It does not include mountain hemlock and lodgepole pine, which are not considered species at risk to white pine blister rust or experiencing recent signs of declining health in California based on recent science-based evaluations. These evaluations are summarized in the Pacific Southwest Research Station Science Synthesis (PSW-GTR-247; Long et al. 2014) and Natural Range of Variation Assessments for Sierra Nevada red fir and subalpine forests (Meyer 2013a, b; cited in the “References” section of the final environmental impact statement).

7037

Native plants are not adequately protected by the Inyo Forest Plan. There should be plan components to protect them. If native plants are present, protect and nurture them. Do not chop, mow, hack, rotabeat, aerate, herbicide, burn them with napalm and drip torches, etc.

Response: The forest plan includes direction designed to maintain native plant communities and the diversity of native species under the “Animal and Plant Species Desired Conditions” section (for example, SPEC-FW-DC-01, 02 and 03). In addition, the forest plan includes components for terrestrial ecosystems forestwide and 15 specific terrestrial ecosystem types that occur within the plan area. Many of these components support the conservation of native plants and communities by providing for the integrity of ecosystem function and diversity, for example, by providing for “ecosystem diversity” (TERR-FW-DC-01); utilizing fire as a "key ecological process in fire-adapted ecosystems" that "enhances ecosystem heterogeneity and habitat and species diversity" (TERR-FW-DC-06); maintaining "vegetation [that] is a mosaic of diverse ecological types with native shrubs and grasses" (TERR-XER-DC-01); and "increasing diversity by promoting hardwoods, pines, and native plant species" (TERR-FW-GDL-01). Any specific treatments or management actions (such as mowing, hacking, herbicide application, etc.) would be consistent with the intent of forest plan direction and would be further analyzed at the project level.

7038

Desired condition basal area ranges for red fir (TERR_RFIR_DC 05) are too low (see Schumacher, Francis X., “Yield, Stand and Volume Tables for Red Fir in California,” Bulletin 456, UC Printing Office, 1928, basal area in red fir stands commonly reaches 450 square feet).

Response: Desired conditions for basal area ranges in red fir forests (TERR-RFIR-DC-05) is based on the natural range of variation that includes the Schumacher (1928) estimate of basal area based on a small sample of 6 old-forest plots. Most of Schumacher’s (1928) forest inventory plots were established in early- and mid-successional red fir stands, with less than 5 percent of these plots established in old-growth stands. Consequently, Schumacher’s (1928) basal area estimates are largely irrelevant for estimating the natural range of variation of red fir stands. A small proportion of Schumacher’s (1928) red fir plots do include old-forest stands (about 6 total). The basal area estimates from these plots are substantially higher than other published natural range of variation estimates in Sierra Nevada red fir forests summarized in the natural range of variation of red fir forests in the bioregional assessment area (Meyer 2013a). Based on a weighted average

(weighted by sample size) of studies in red fir forests, the natural range of variation of red fir basal area is approximately 75 to 425 square feet per acre (average: 250), which does not factor in projected reductions in basal area associated with climate change and the greater aridity and lower productivity of red fir stands on the east side of the Sierra Nevada crest (values based on west slope of the southern Sierra Nevada). Consequently, the basal area range for red fir was increased in the forest plan from "50-300; mostly less than 250 square feet per acre" to "50-350; mostly less than 300 square feet per acre."

7039

Diameter limits should be higher (36 inches), since most trees in the red fir (and white fir) types are over 30 inches in diameter and little use of this type for California spotted owl or fisher.

Response: See response to comments 7284 and 7287.

7042

RESTORATION

Terrestrial ecosystem and vegetation restoration is not clearly defined in the plans. The plans need to include more detailed definitions and explanations of how achieving one or several or portions of desired conditions contribute to restoration in part or fully.

Response: See response to comment 7043 regarding the definition of ecological restoration in the forest plan. Terrestrial Ecosystem Objectives TERR-FW-OBJ-01 to 03 (final plan, chapter 2) sets clear objectives for the restoration of vegetation structure, composition, and function (for instance, restoration of natural fire regimes), and enhancement of Tribal resources over a specific acreage range and time horizon. These objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions based on reasonably foreseeable budgets (2012 Planning Rule section 22.12).

7043

The draft environmental impact statement and the plans use the words restoration and restored incorrectly and inconsistently and do not clearly specify what condition needs to be restored and what the desired restoration condition is.

Response: Ecological restoration is defined in the glossary of the final environmental impact statement and forest plan as "the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecological restoration focuses on reestablishing the composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystem sustainability, resilience, and health under current and future condition." Although use of the terms "restoration" and "restored" in the final environmental impact statement and forest plan may vary based on the context of its usage (for example, restoration of structural heterogeneity versus fire regime restoration implies recovery of ecosystem structure versus function), the basic definition of these terms remains consistent throughout these documents. Specific, fine-scale ecological restoration objectives would be analyzed at the project level.

7044

The draft environmental impact statement incorrectly states that the desired conditions will be met after a single logging treatment changes tree density and canopy cover (becoming FRCC class 1); however, the desired conditions as described in the Plans

will require decades to develop and cannot be reached by logging; therefore, revise the Plans to explain that the desired conditions will take a long period of time to develop. Nowhere in the draft environmental impact statement or draft plans are the specific characteristics of FRCC 1 or any other FRCC defined. Goals should be added to make clear that the short and mid-term goals are to increase fire resiliency and reduce incidence of large, severe fires while maintaining habitat for at-risk species.

Response: The "Terrestrial Ecosystem Processes and Functions" section of the final environmental impact statement explains that forest restoration treatments (for instance, mechanical thinning treatments, prescribed fire, or wildfire managed for resource objectives) all contribute towards changes in vegetation composition and structure (including but not limited to changes in canopy cover and tree density) that shift current vegetation conditions towards desired conditions as described in the forest plan. Restoration based on mechanical treatments are more effective when combined with prescribed fire (noted in "Fire Trends" section). This shift in vegetation conditions results in the transition of current conditions characterized by higher fire regime condition classes (FRCC), such as condition class 3 (characterized by fire regimes and vegetation attributes have been substantially altered from their natural range) to lower condition classes such as class 1 (with fire regimes and vegetation attributes that are within the natural range). The specific characteristics and definitions of individual fire regime condition classes are described in the "Glossary" and "Fire Trends" sections of the final environmental impact statement and the Fire Ecology Supplemental Report (for the latter, see table entitled "Description of differences between Fire Regime Condition Classes").

As explained in the "Fire Trends" section of the final environmental impact statement and Fire Ecology Supplemental Report, the transition to lower fire regime condition classes can be achieved through the application of one or more restoration treatments of varying intensity and frequency (most often the application of a combination of restoration treatments) over the entire planning period rather than during a single point in time. The Fire Trends section of the final environmental impact statement was clarified to highlight the fact that forest landscapes require multiple decades of restoration treatments across a large spatial scale to reduce fire risk and restore forest structure and composition (for instance, transition to lower fire regime condition classes).

The terrestrial ecosystem objectives of the forest plan (TERR-FW-OBJ) set clear acreage objectives for the restoration of vegetation species composition and structure, restoration of natural fire regime mosaics, and enhancement of Tribal resources over a 10 to 15 year time horizon following plan approval.

The final plan already contains desired conditions and goals of increasing resilience to fires and reducing incidence of large, severe fires (chapter 2, "Terrestrial Ecosystems and Vegetation" section, TERR-FW-DC-01, 02, 06, 07; "Fire" section, FIRE-FW-DC-03, FIRE-FW-GOAL-01).

7046

The forest plans fail to provide science to support that thinning and logging can effectively restore resilience to drought and climate change. There is no evidence to show that past logged and thinned areas have become more resilient to California's extended drought. Before the public can be convinced that continuing to implement thinning and logging by the plan action, more resilient to drought and climate change, irrefutable scientific proof of the survivability of past thinned and logged forests to drought and climate change must be provided. Best available science information and

explicit spatial analysis of past thinning, logging and plantations related to mortality need to be provided.

Response: See response to comment 7245.

7048

The plan and draft environmental impact statement do not address that green trees surviving the current drought may have genetic make-up that makes them more resilient. These need to be retained.

Response: The forest plan provides several desired conditions for the resilience of vegetation to drought and other stressors, including TERR-FW-DC-02, TERR-UPPR-DC-01 and 03, TERR-ALPN-DC-03, and TERR-OLD-DC-01. At the site-specific project level, project design would consider the retention and management of "green trees" surviving the current drought.

7049

Areas with heavy tree mortality will have become resilient to insects/pathogens and not need restoration for resilience to these agents of change. The plan needs to reflect that.

Response: Tree mortality associated with drought, insects, pathogens, warming climate, and wildfires on the Inyo National Forest are recognized in the forest plan in several sections, such as forestwide desired conditions (TERR-FW-DC-02), red fir and lodgepole pine (TERR-RFIR-DC-04), and the Old Forests introduction. In addition, the forest plan Monitoring Program includes several monitoring questions and indicators that evaluate patterns of tree mortality associated with drought, climate change, and other stressors (see "Terrestrial Ecosystems" and "Climate Change and Other Stressors" sections of chapter 4 in the final plan). Such information will document whether desired conditions for tree basal area will be met under current or future tree mortality events associated with interacting stressors and will inform decisions regarding management of forest areas with tree mortality.

7050

Vegetation plan components related to vegetation management.

Terrestrial vegetation plan components are incomplete, lacking or not clear. They need to be revised, including adding standards and guides to more clearly guide achievement of desired conditions.

Response: Chapters 2, 3, and 4 of the forest plan contain many vegetation plan components related to "Terrestrial Ecosystems," "Watershed Conditions," "Animal and Plant Species," "Invasive Species," "Timber," "Range," and other sections (for example, "Fire"). Design criteria (for instance, standards and guidelines) in these sections provide clear, concise, and comprehensive constraints on vegetation management activities that help achieve or maintain desired conditions for vegetation, avoid or mitigate undesirable impacts, or meet relevant legal requirements. To further improve clarity of terrestrial vegetation plan components in the forest plan, terrestrial vegetation types were organized into three distinct ecological zones: Sierra Nevada montane zone, subalpine and alpine zone, and eastside shrublands and woodlands zone.

7051

There is no requirement to meet the desired conditions for terrestrial systems immediately post-treatment. This means that post-treatment conditions could be even

more degraded or departed from desired conditions than those before. Standards and guides need to be added.

Response: In chapter 4, Design Criteria, Forestwide (TERR-FW-STD) 01, the forest plan specifies for mechanical thinning harvests specifically designed to treat fuels, and/or control stand densities, within the wildfire restoration and maintenance zones, retain all live conifer trees 30 inches in diameter or larger, except for operability. In Guidelines for Terrestrial Ecosystems, Forestwide (TERR-FW-GDL) 01 says projects should facilitate increasing heterogeneity at all scales, from tree clumps to large landscapes…using landscape topography to vary stand densities; promote tree clumps and gaps within a stand, increasing the proportion of large to small trees; retaining important habitat structures such as large trees, snags and trees with broken tops; and increasing diversity by promoting hardwoods, pines and native plant species. TERR-FW-GDL 02 says that vegetation treatment projects should include a widely distributed but often clumped distribution of snags and downed logs. Some snags and downed logs should be retained along edges of openings and within groups and clumps of large trees to provide habitat and roost sites for wildlife species such as small mammals, cavity-nesting birds and tree-dwelling bats. TERR-OAK-GDL says mechanical vegetation treatments and prescribed fire and salvage operations should retain all large hardwoods greater than 12 inches in diameter, except where they pose a threat to human life or property. All of these standards and guidelines paint the picture of the landscape after treatment, and they are used to write silvicultural prescriptions. Silvicultural prescriptions describe the site specific objectives at the project level, and they define through the development of marking guidelines how the treatment will be implemented. The silvicultural prescription should describe conditions directly after treatment at the stand level. Thinning prescriptions using GTR 220 concepts, which are the primary type of treatment used in forested stands, do not incorporate precise spacing standards or consistent amounts of canopy cover across the landscape. Thinning is intended to create variability in spacing resulting in heterogeneity in stands both at the stand scale and at the landscape scale.

7052

The plans are lacking plan components (for instance, standards or guidelines) to ensure that canopy cover would not drop below median values in treatment areas; providing no protection for underrepresented ecological conditions (for instance, CASPO and fisher habitat); therefore, add standards or guidelines concerning retention of canopy cover and specify how canopy cover should be measured (consistent with CASPO interim guidelines and fisher strategy) and accounted for.

Response: The forest plan includes several desired conditions related to forest canopy cover, including TERR-DMC-DC-03, TERR-MJF-DC-01, TERR-RFIR-DC-03, TERR-LDGP-DC-05 and 08, and the Table “Structure within forested patches” in the “Terrestrial Ecosystems” section. These desired conditions are based on variable levels of canopy cover that range from relatively open to closed canopy conditions that are characteristic of the natural range of variation in Sierra Nevada forest ecosystems. These heterogeneous canopy cover conditions that promote forest ecosystem resilience and habitat diversity would not be supported by standards or guidelines that require canopy cover to be maintained above a rigid, median value of cover that is unrepresentative of the overall canopy cover conditions within a forest stand. Rather, standards and guidelines, such as TERR-FW-STD-01 (retain large conifers during mechanical thinning), TERR-FW-GDL-01 and 02 (increase forest heterogeneity and retain tree clumps and large tree cover for wildlife habitat), TERR-OLD-GDL-01 and 02 (retain large and old trees in old forests), TERR-CES-GDL-01c and TIMB-FW-GDL-03 (restore forest cover to deforested areas for habitat connectivity), SPEC-FW-GDL-01 (retain all known nest, roost, and den trees for wildlife), and

SPEC-SM-GDL-01 (marten habitat and tree retention including canopy cover), would provide plan direction for canopy cover and tree retention in forest ecosystems that support habitat and connectivity for forest dependent species requiring higher levels of canopy cover.

Estimation of canopy cover would be addressed in project-scale analysis using information provided in PSW-GTR-220/237 and associated best available science information sources.

7053

Plan direction is missing specific emphasis on tree densities. This is a key aspect of resilience but is not sufficiently addressed. There should be desired conditions on tree densities (for instance, 80 to 100 trees per acre).

Response: In chapter 2 of the forest plan, in the "Terrestrial Ecosystems" section, a table displaying "Large and/or old trees at landscape scale" shows the desired condition for trees per acre greater than 20 inches diameter, 30 inches diameter, 40 inches diameter, and the proportion of the landscape with large and/or old trees for vegetation types on the Inyo National Forest. Also in this same section is shown the desired conditions for the vegetation types by basal area, which is a tree density measure, along with desired canopy cover and shrub cover.

7054

The best available science information on historic vegetation structure and composition in forests used to develop the desired conditions is flawed. Some areas (or more) were higher density than portrayed.

Response: The best available science information (best available science information) supporting historic (and projected future) vegetation structure, composition, and function in the forest plan and final environmental impact statement are diverse, comprehensive, and robust. This best available science information includes the Pacific Southwest Research Station Sierra Nevada Science Synthesis (PSW-GTR-247), Sierra Nevada natural range of variation assessments (10 documents total), Ecosystem Management Strategy for Sierra Mixed-Conifer Forests (PSW-GTR-220/237), Bioregional Assessment, and numerous other published documents (for example, peer-reviewed science literature). This best available science information clarifies that historic tree densities and canopy cover in Sierra Nevada forest ecosystems were highly variable (for instance, ranging from open to closed canopy conditions) based on changes in topography, local site conditions (soils, geology, climate), and stochastic factors (disturbance regimes). These conditions and associated best available science information are documented in detail in the "Terrestrial Ecosystems" section of the final environmental impact statement and associated supplemental reports (for example, Old Forests, Terrestrial Vegetation Ecology).

7056

The plans are lacking an integrated approach to managing mega wildfire, insect and disease and wildlife habitat (for instance, CASPO, fisher). It is unclear how all of the varied plan components for different resources would work in combination. The plans need to be revised to make it clear how all of the key restoration and resource needs would be integrated.

Response: The forest plan has been revised to combine all plan components together in the same section, such as desired conditions, objectives, goals, standards, guidelines and potential management approaches are grouped by ecological zone or ecosystem type. This change clarifies how varied plan components would work in combination for a specific ecosystem type. In addition, the forest plan has an integrated and balanced set of plan components to provide for

long-term ecological health and sustainability (for example, healthy and resilient ecosystems, availability of wildlife habitat for old forest-dependent species). For example, desired conditions for Sierra marten such as SPEC-SM-DC-01 (Risk of large high intensity fire is reduced in marten core habitat areas) and SPEC-SM-DC-02 (vegetation in marten core habitat is trending toward desired conditions for terrestrial and riparian vegetation) is directly compatible with desired conditions for old forests (for example, TERR-OLD-DC-01; old forests are resilient to fire, drought, insects, pathogens, and climate change), upper montane forests (TERR-UPPR-DC-01; vegetation structure and composition is resilient to fire, drought, insects and pathogens, and climate change), and fire management (FIRE-FW-DC-01; wildland fires burn with a range of intensity, severity and frequency that allows ecosystems to function in a healthy and sustainable manner). These and other plan components were derived from an interdisciplinary process, designed to integrate and balance resource concerns into a set of plan components that promote multiple benefits and reduce risk to stressors (2012 Planning Rule, chapter 22). In addition, project level evaluation and analysis would determine the best approach for balancing, integrating, and achieving multiple, potentially-competing management objectives by ensuring that desired conditions related to wildlife habitat, ecosystem sustainability, fire management, and other considerations are met across the analysis area.

7057

The plans need to have a focus and intent of achieving healthy and resilient forests using a balanced approach. This is not clear in the current plans.

Response: See response to comment 7056.

7058

Long term restoration goal should be emphasizing natural processes. But many areas need restoration to reach conditions where natural processes can function properly.

Response: Several long-term plan components emphasize the restoration of: (1) natural processes and (2) vegetation structure and composition that facilitate proper ecosystem function (for instance, operation of natural processes within the natural range of variation). These include TERR-FW-GOAL-01 (work cooperatively to develop restoration measures that promote beneficial ecological conditions), TERR-FW-OBJ-01 (Increase heterogeneity and restore species composition in eastside vegetation types), TERR-FW-OBJ-02 (Restore natural fire mosaics using prescribed fire), and WTR-FW-OBJ-01 (Priority watersheds achieve higher function). Collectively, these plan objectives strive to restore proper function to degraded ecosystems through the realignment of ecological structure, composition, and function with the natural range of variation.

7059

The emphasis should be on meeting desired conditions and a healthy forest. Cutting trees produces a byproduct of the real goal, which is ecosystem management. The separation of timber, vegetation, and fire management in the draft environmental impact statement illustrates this lack of integration. (good example is LTBMU plan), please change the wording to help the public understand how timber and harvesting are tools for restoration

Response: Agreed. Desired conditions for ecosystem and vegetation types listed in the final plan (chapter 2, “Terrestrial Ecosystems and Vegetation” section) are targets to be maintained once achieved. Vegetation manipulation and fuels treatment projects normally work in conjunction as a

means for moving towards and achieving desired conditions such as long-term ecological resilience. As noted in the final environmental impact statement (final environmental impact statement, Benefits to People and Communities, "Forest Products and Ecosystem Services" section), the generation of forest products from cutting of trees, such as fuelwood, is a secondary benefit and provides economic support to implement projects and economic benefits to local communities, providing revenue, jobs, and a less expensive heating source.

7060

Plans fail to provide important direction and guidance for setting priorities. The ecological benefits and economic consequences of the direction and alternatives to it should be evaluated in the draft environmental impact statement.

Response: The plan does not set overall priorities, but within the individual resource areas, however, priorities are set for some resources. For example, in chapter 3 under goals and then fire, the plan says to prioritize fuel treatments in areas that pose the greatest threat to communities and highly valued resources. In chapter 3, Potential Management Approaches, the Plan says areas that historically supported more frequent fire…and areas with high existing levels of understory fuels are prioritized for treatment. In chapter 3, under Potential Management Approaches, Terrestrial Ecosystems, the Plan says to prioritize restoration in key old forest areas. It also says projects in sagebrush should prioritize restoration treatment to remove trees from shrublands. In appendix B, under Invasive Species, the Plan says to focus treatment efforts on high priority invasive species and infestation, while developing management goals for lower priority species and infestations. It also says to prioritize areas such as wilderness, research natural areas, botanical areas, wild and scenic areas, and aquatic and riparian areas to maintain the integrity of native species and ecosystems. In appendix D, the Plan says that forest management in wildfire protection zones and strategic ridge tops will be prioritized for treatment.

chapter 3 of the final environmental impact statement, in Benefits to People and Communities, Environmental Consequences, and Area Restored, a table (entitled: Projected 10-year harvest area in acres by management practice and alternative) shows projected 10-year harvest in acres for each of the alternatives by management practice. Also, see "Area Restored" for each alternative in this section where more specific details are discussed for each alternative. In the final environmental impact statement Benefits to People and Communities under Forest Products and Management, a table shows the 10-year cost estimates for mechanical, prescribed fire and managed fire activities in each action alternative (entitled: 10-year discounted cost estimates for mechanical, prescribed fire and managed fire activities in each action alternative).

7061

Fuels reduction should be a fire management priority for avoiding catastrophic fires.

Response: The introduction of the final plan (chapter 1, "Distinctive Roles and Contributions of the Plan Area" section) specifically states that "Tools used to reduce hazardous fuels and maintain fuel conditions include wildfires managed to meet resource objectives, prescribed burning and mechanical treatments." The final plan includes numerous desired conditions, objectives, goals and management approaches that emphasize the importance and use of a variety of fuels reduction approaches to restore forest conditions and reduce the risk of catastrophic fires (final plan, chapter 2, "Terrestrial Ecosystems" section, TERR-FW-DC-02, 08, 09, TERR-FW-OBJ-01, 02, 03, Potential Management Approaches; "Fire" section, FIRE-FW-DC-01, 02, 03, FIRE-FW-GOAL-01, 02, 03, 04, 05, Potential Management Approaches; "Timber and Other Forest Products" section, TIMB-FW-GDL-01, 02, Potential Management Approaches).

7063

a) Draft environmental impact statement and proposed plans do not show how the forests would increase pace and scale of vegetation treatments. The analysis needs to be revised to better explain how increased pace and scale would occur. Underlying assumptions and data supporting objectives need to be included.

b) It is unclear how forests intend to increase the levels of prescribed burning when they have such a back-log. The objectives are not realistic.

Response: The final environmental impact statement Summary displays a comparison of the acres by treatment type for each alternative. This section shows possible increases in mechanical treatments for all plan revision alternatives except for alternative C. Projected 10-year harvest volumes at a minimum double over the present outputs for alternative D, and potentially increase for alternatives B and modified B. More importantly, the increased pace and scale is evident in the estimated wildfires managed to meet resource objectives. Pace and scale of restoration is increased from 10,300 (alternative A) to 64,000 acres in alternative B and alternative B-modified, and up to 93,000 acres per decade in alternative D. The forest plan in Timber and Other Forest Products talks about increasing pace and scale in desired condition (TIMB-FW-DC) 01, Potential Management Approaches, and under Fire Goals (FIRE-FW-GOAL) 03. Also, see final environmental impact statement, chapter 3, Benefits to People and Communities, “Forest Products” section for a comparison of real discounted cost by alternative.

See also response 7065 for discussion about increases in pace and scale and 7072 for discussion about acreage targets of restoration treatments and how they were derived.

The final environmental impact statement Summary also displays a comparison of prescribed burning acres per decade for each alternative. All plan revision alternatives show increases over alternative A with the possible exception of alternative C if only the lower end of the range was achieved. While these targets fall short of the historic natural extent of wildland fire, they strike a balance with the need consider multiple constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resources, funding availability and risk aversion.

7065

The pace and scale of restoration in the plans is inadequate compared to the need. Restoration will be inadequate. A sense of urgency is not included, despite continued large fires and mortality. The plans need to be revised.

Response: The opportunities for increasing pace and scale are limited on the Inyo National Forest as compared to other forests that are within close proximity to mills. Here, commercial timber sales are limited to mostly fuelwood and special forest products because the haul distance to the nearest mill is over 300 miles, making timber sales cost prohibitive (final environmental impact statement chapter 3 Benefits to People and Communities). Also, biomass facilities do not exist within a feasible distance to the Inyo National Forest. The greatest opportunity for increasing pace and scale on the Inyo is through managed fire, which is reflected in the alternatives. In the final environmental impact statement Summary it shows a comparison of the alternatives including the estimated acres of managed fire. Pace and scale of restoration is increased from 10,300 to 64,000 acres in alternative B-modified, and up to 93,000 acres per decade in alternative D. Tree mortality on the Inyo National Forest is not as widespread as in other Southern Sierra Forests such as the Sierra and Sequoia NF, hence the urgency is not as great as in those areas of high mortality. The Plan contains plan components (FIRE-FW-GOAL 01, 03; FIRE-FW-STD 01,

02; FIRE-FW-GDL 01, 02, 04; FIRE-FW-DC 01, 03) that specifically address the risk of wildfire and that emphasize restoration objectives.

7066

The combination of estimated acres for managed wildfire and objectives for prescribed fire fall far short of what is needed to achieve fire regime-fire resilience in the long term. These need to be increased.

Response: The planning rule states that any plan component objectives must be based on reasonably foreseeable budgets (36 CFR section 219.73ii). All plan alternatives strive to increase the pace and scale of prescribed and wildland fires managed for ecological benefit and fire resilience. Alternative B-modified includes at least 20,000 mechanical treatment acres and at least 20,000 acres of prescribed burning within 10 – 15 years (Final plan chapter 2, TERR-FW-OBJ 01, 02) and 64,000 acres/decade of wildfire managed to meet resource objectives (final environmental impact statement chapter 3, "Agents of Change" section), and it is the preferred alternative because it balances the need to consider opposing constraints including budget, public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (see draft record of decision).

7067

The pace and scale of thinning and burning in alternative D needs to be incorporated into the preferred alternative. That is the only level that will achieve some level of needed resilience.

Response: There is a 5,000 acre difference in mechanical thinning from alternative B and alternative B-modified (preferred) to alternative D. The prescribed fire acres are the same. See table in final environmental impact statement, chapter 2, Comparison of Alternatives by Restoration Activities, table titled "Estimated amounts of restoration activities by alternative per decade." The Inyo National Forest does not have a mill in close enough proximity to the national forest to be a feasible option (see final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Product and Ecosystem Services). The primary increase in acres treated over current levels will come from managed fire (see section in chapter 2 mentioned above).

7070

Opening the forest canopy causes adverse impacts (for instance, hot and dry, windy increasing fire risk, removes stored carbon, jeopardizes old-growth species at risk)

Response: The forest plan includes several desired conditions related to forest canopy cover, including TERR-DMC-DC-03, TERR-MJF-DC-01, TERR-RFIR-DC-03, TERR-LDGP-DC-05 and 08, and the Structure within forested patches table in the "Terrestrial Ecosystems" section. These desired conditions include variable levels of canopy cover that range from relatively open to closed canopy conditions that are characteristic of the Natural Range of Variation (natural range of variation) in Sierra Nevada forest ecosystems. The large range in canopy cover promotes: (1) habitat heterogeneity that supports a diversity of forest-dependent wildlife and plant species, and (2) forest resilience to stressors (for example, uncharacteristically severe wildfire) based on changes in site conditions (for example, soils), topography, and local climate. The benefits of open canopy conditions on wildfire risk, old forests, wildlife habitat conditions (such as habitat for pollinators), and forest carbon stocks are discussed in the "Terrestrial Ecosystems" section of the final environmental impact statement and associated supplemental reports (for

instance, Carbon, Old Forests, and Terrestrial Vegetation Ecology). These sections document that open canopy cover forest stands were historically common and spatially variable in fire-adapted forests of the Sierra Nevada, and such conditions reduced landscape-level wildfire risk, increased forest carbon carrying capacity, and supported habitat for old-forest dependent species (for example, marten, Northern goshawk).

7072

Assumptions and methods to assign acreage targets (objectives) to each alternative is missing.

There's no discussion as to how the Forest would increase pace and scale.

Response: The rationale and methods for determining acreage targets are available in the project record (Inyo National Forest Vegetation Objectives, February 27, 2015). The explanation of these objectives has been clarified in the final environmental impact statement (chapter 2, Comparison of Alternatives by Restoration Activities). Alternative B-modified increases the pace and scale of restoration, mostly through wildfires managed to meet resource objectives (final environmental impact statement chapter 2, Description of Alternatives, B-modified). Also see 7088, and see 7065, and 7063 for pace and scale.

7073

The analysis supporting conclusions on pace and scale of vegetation restoration are incomplete and flawed. The draft environmental impact statement does not display the ACTUAL amount of prescribed burning and thinning that has occurred on each Forest over the past 25 years; this is the baseline for increasing pace and scale. Current levels are below what was planned making it unlikely that it will be increased with the new plans. The analysis needs to be revised and assumptions about how resilience will be achieved need to be documented more completely.

Response: The analysis has been improved between draft and final and amounts of past prescribed burning and thinning that have been accomplished has been included (final environmental impact statement chapter 3, Fire Management, Affected Environment). Alternative B-modified recognizes the limitations to increasing pace and scale and puts in place a realistic approach to achieving resilience, mostly through wildfires managed to meet resource objectives (final environmental impact statement chapter 2, Description of Alternatives, B-modified). Also see 7072.

7076

The effects of forest harvesting and associated treatments (for instance, borax treatments on stumps) on fungi and associated soil biota and have not been addressed. These are important for resilience to disturbance and environmental stress. This includes forest mycorrhizae. Impacts include changes to nutrient availability and the ability of forests to respond to disturbance or drought stress. The impacts of treating stumps with borax based fungicide are detrimental to mycorrhizal fungi networks and have not been addressed.

Response: Sporax and other borax-type product treatments are considered on a cost benefit basis to be more beneficial than detrimental in preventing annosus root disease. The Region 5 website (https://www.fs.usda.gov/detail/r5/forest-grasslandhealth/insects-diseases/?cid=stelprdb5329386) contains multiple publications on borax use and issues related to its use.

7077

These impacts to soils, Mycorrhizal Fungi networks, streams, and watersheds from these biomass removal projects must be acknowledged and added to the existing damage and foreseeable future damage from past and future treatments in the forest to provide an accurate assessment of the adverse effects of biomass removal.

Response: Treatments to reduce hazardous fuels and restore forest health when conducted using mechanized equipment will appear disturbed for 3 to 5 years following implementation. Although these treatments employ best management practices and resource protection measures, results at the time of treatment stands out from untreated forest and it takes some time for those disturbances to return to a more natural appearance. There are certain trade-offs between the type of disturbance that occurs when a high intensity crown fire occurs versus a treatments meant to emulate a low intensity surface fire. What is considered destructive is a matter of perspective.

Effects to soils are included in the final environmental impact statement (chapter 3, Aquatic and Riparian, "Water Quality, Water Quantity and Watershed Conditions" section). All specific proposed actions for vegetation management and their potential effects on humans and the environment would be documented during project level analysis.

7079

North et al. (2009) was grossly misinterpreted and applied in the plans and draft environmental impact statement (for instance, "removal" of trees has been too broadly applied).

Response: GTR 220 (North et al. (2009)) is discussed in the final environmental impact statement, chapter 3, Terrestrial Ecosystems, "Analysis Methods and Data Sources" section and in Consequences Specific to Alternative B. In the Plan, an addition was made in the "Vegetation Management Practices" section that discusses GTR 220 approaches. GTR 220 refers to 20-to-30-inch diameter trees as intermediate sized trees, and your comment refers to "mature trees" as up to, or over, 20 inches in diameter. This response will assume that intermediate sized trees are generally the same as mature trees. GTR 220 says:

Under what conditions could intermediate trees be thinned? We suggest the following criteria but stress that these criteria are based on working hypotheses. The first selection criteria is species. Thinned intermediate-size trees should only be fire-sensitive, shade-tolerant species such as white fir (*Abies concolor* (Gord.& Glend.) Lindl. ex Hildbr.), Douglas-fir (*Pseudotsuga menziesii* (Mirb.) Franco) and incense-cedar (*Calocedrus decurrens* (Torr.) Florin). In mixed-conifer forest, attempt to keep intermediate-size pines and hardwoods because of their relative scarcity and importance to wildlife and fire resilience. A second criterion would be tree growth form. Some intermediate-size trees can still function as ladder fuel, particularly those that were initially grown in more open conditions (fig. 12). These trees can have live and dead limbs that extend down close to the forest floor providing a continuous fuel ladder. A third condition is middle to upper slope topographic position. In these slope positions, some thinning of intermediate-size trees may help accelerate the development of large "leave" trees. We suggest, however, that these criteria not be applied to riparian areas, moist microsites often associated with deeper soils, concave topography, or drainage bottoms because these areas may have supported higher tree densities and probably greater numbers of intermediate size trees (Meyer et al. 2007b).

GTR 220 does not describe the tree removal methods or techniques or suggest that "removed" trees be left on site as snags or logs.

Citation: North, Malcolm; Stine, Peter; O'Hara, Kevin; Zielinski, William; Stephens, Scott 2009. An ecosystem management strategy for Sierran mixed-conifer forests. Gen. Tech. Rep. PSW-GTR-220. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station. 49 p.

7082

The assessment needs to consider existing or potential future occurrence of hydrophobic (aka water repellant) soils as a result of management and fire.

Response: The final environmental impact statement analyzes the impacts of management and fire activities on soils (final environmental impact statement chapter 3, Water Quality and Quantity, Environmental Consequences).

7083

The draft environmental impact statement must take a hard look at the differences between fire and logging and not simply assume that widespread mechanical treatments will "restore" forests and provide the same habitat benefits that mixed- and high-intensity fire do.

Response: A discussion and comparison of the ecological effectiveness of mechanical thinning, prescribed fire, and other restoration treatments has been added to the “Agents of Change” and “Terrestrial Ecosystems” sections of the final environmental impact statement. Additional information pertaining to the effectiveness of mechanical thinning and other restoration treatments is provided in the Terrestrial Vegetation Ecology Supplemental Report and Fire Ecology Supplemental Report of the final environmental impact statement.

7084

The Tables (draft environmental impact statement, p. 50) referred to as "Estimated amounts of restoration activities by alternative" are an important aspect of the Plan Revision process because they underpin and go to the heart of the Draft Plans with regard to how fire management and wildlife conservation will play out on the landscape. Consequently, it is essential that the assertions/numbers represented in these tables be understandable. They are not, however, as it is impossible to know where the numbers came from at all, let alone where they would likely occur on the landscape. This shortcoming is thus significant and must be corrected.

Response: We have modified the tables in the final environmental impact statement (chapter 3, “Agents of Change” section) to include a discussion explaining how the numbers represented in the table was developed. The rationale and methods for determining acreage targets are available in the project record (Inyo National Forest Vegetation Objectives, February 27, 2015). Location of restoration activities is decided at the project level.

7085

Implementation of Treatments

The costs of treatments and a cost-benefit analysis was missing or inadequate in the draft environmental impact statement. Assumptions about what would be treated and the feasibility given agency processes were not disclosed and past experience makes it unlikely that the objectives will be achieved as assumed in the draft environmental impact statement analysis. The analysis needs to be revised.

Response: Refer to 7087 and 7088.

7086

Please disclose in the final environmental impact statement the realistically "foreseeable" cost data for the various fuels treatments you estimate will be necessary for full implementation of the plan and achievement of desired objectives.

Response: Refer to 7088.

7088

The costs of restoration have not been adequately addressed across the alternatives. There needs to be more data provided and an analysis of the cost of implementing the various restoration activities.

Response: Estimated treatment cost information by alternative for the Inyo National Forest is included in the final environmental impact statement (chapter 3, Benefits to People and Communities, “Forest Products and Management” section). The final environmental impact statement presents a 10-year estimate of the total costs of restoration mechanical treatment, prescribed fire and managed fire activities across the plan revision alternatives. Each of these restoration activities is utilized at a different rate under each of the plan revision alternatives and as a result, the total costs of these alternatives vary. These results show that alternatives B-modified, B and D have the higher estimated costs and alternative C has lower total costs. It is important to note that this analysis is only looking at costs and not the effectiveness of the restoration activities.

7091

Plans should have a clearer identification of what types of vegetation management and/or managing fires would be emphasized to reduce fuels and restore vegetation and where these would occur.

Response: The types of management tools used for vegetation management are decided at the project level. The final plan includes vegetation management objectives (TERR-FW-OBJ-01 through 03). The management of wildfires has been clarified in the final environmental impact statement (chapter 3, Fire Management, Background).

7092

The cost-benefit analysis of active management needs to be clearer.

Response: Refer to response to 7088.

7093

Increase focus on reducing surface and ladder fuels and using prescribed and managed wildfire as the primary forest fuels reduction and forest restoration tools. Implement TEK techniques for fuel reduction, regrowth, and sustainability.

Response: The plan includes components to use prescribed and managed wildfire to reduce fuels and restore ecosystems (see “Strategic Fire Management Zones” section and also FIRE-FW-DC-02 and FIRE-FW-DC-03). Traditional ecological knowledge is also recognized as a valued part of the process when developing and implementing restoration projects and other forest programs (TRIB-FW-DC-04). Coordination and cooperation with Tribes is recognized throughout the forest plan.

7094

A broader range of silvicultural treatments should be considered and included in appendix E of the plans.

The associated FVS modeling should broaden beyond group selection and thinning. The analysis should include both within-stand and landscape scales.

There is a disparity between vegetation desired conditions based on natural range of variation and GTR 220 and the silvicultural analysis based on the estimated full stocking and threshold of eminent mortality.

A matrix of trigger conditions and silvicultural options should be developed for each CALVEG type and crown cover condition.

Response: Appendix D of the final plan discusses reforestation, site preparation, release treatments, precommercial thinning, and timber harvest. A new description for thinning was added to this section of appendix D that emphasizes the use of GTR 220 (North et al. 2009).).

Since GTR 220 concepts allow for greater variability in thinning techniques as compared to traditional approaches, we feel that the suite of treatments is sufficient to meet the desired conditions in the plan.

The FVS model is an individual tree, distance independent growth and yield model. Its application is best used at the stand scale. FVS is a standard tool among Forest Service managers. While FVS is used to predict outcomes of treatments at the stand scale, data generated by the model can be compiled and used to predict outcomes at the landscape scale and to compare alternatives.

The vegetation desired conditions for basal area and canopy cover use very broad ranges, which are meant to allow for variability at multiple scales, consistent with GTR 220 and natural range of variation. However, there was an error in the draft plan and in the draft environmental impact statement with the stocking criteria for suitable lands by forest type. The values have now been corrected.

The forest plan describes desired conditions at different spatial scales by vegetation type. Resource specialists on the Inyo National Forest are highly skilled at recognizing unhealthy or problematic conditions. We also have access to Forest Health staff who specialize in diseases, insects, and other forest health problems. Vegetation specialists and silviculturists address these conditions on a site-specific level using the best combination of tools mentioned above.

7095

The plans are not clear that mechanical treatment to reduce fuel loads needs to precede prescribed burning in most areas. Mechanical thinning to reduce the fuel loading followed by prescribed burning is the only reasonable approach to move the vegetation toward the desired condition. Increase mechanical treatments in order to accommodate an increase in prescribed fire and managed wildfire regimes and intensity (otherwise the FS is limited as to where we can operate).

There should be additional mechanical thinning (multi-diameter) and prescribed burning to restore the forests and support long-term habitat resilience and vibrant

watersheds (including exceptions in protected areas to be more proactive). By fire alone is difficult with backlog and tree mortality.

The full range of past successful means (logging, thinning, grazing, etc.) to improve wildlife habitats and reduce wildfire risks needs to be recognized and taken into account. A recommitment to all of these proven practices is necessary to successfully mitigate current extreme fire hazards and maintain wildlife habitat. An increase in levels is needed to reduce the risk of catastrophic fires and density of drought-stricken, beetle-infested conifers.

Prescribed fire treatment alone is not sufficient to reduce tree density and/or effects of future large fires (smoke). The plans need to emphasize both mechanical thinning and prescribed fire.

Response: The specific type and sequence of vegetation treatment(s) to apply for the purpose of ecological restoration is contingent on a large number of factors, including but not limited to ecological site conditions (vegetation type, fuel loading, site productivity), project restoration objectives (for example, fuels management, wildlife habitat, structural and compositional restoration), site accessibility (for example, road access), local resource availability (for example, staffing, equipment), and localized proximity to infrastructure and the wildland urban interface (WUI). Consequently, this determination of treatment type and sequence is most appropriately determined during project-level evaluation and analysis. The final environmental impact statement provides a comparison of alternatives that emphasize the programmatic application of restoration treatments over the life of the forest plan, including an emphasis on the use of prescribed fire and wildfires managed for resource objectives (alternative C), a combination of mechanical and wildland fire treatments at higher treatment rates than currently (alternatives B and D), and current rates of mechanical and wildland fire treatments (alternative A). The “Agents of Change,” “Fire Management,” and “Ecological Integrity” sections of the final environmental impact statement documents that both mechanical thinning and wildland fire are important vegetation management tools that support a variety of long-term ecological restoration objectives in the planning area, including the restoration of forest ecosystem structure (for example, reduction in tree densities, improvement of wildlife habitat), composition, and function (for example, reduction in negative impacts of wildfire, reduced wildfire risk, maintenance of proper watershed function, resistance to bark beetle outbreaks).

Smoke and other emissions associated with restoration treatments, including mechanical thinning and prescribed fire, are covered in the final environmental impact statement, “Fire Management” and “Air Quality” sections.

The effects of grazing on wildlife habitats is covered in the final environmental impact statement, “Ecological Integrity” and “Wildlife, Fish, and Plants” sections.

7096

Fire should be emphasized as a forest restoration strategy.

Response: Alternative B-modified increase the pace and scale of restoration through the use of managed wildfire to meet resource objectives (final environmental impact statement, chapter 2, Description of Alternatives).

7098

U.S. Forest Service promotes fire in the plans (whether prescribed or managed) in the absence of logging, which is unsupportable given the long-standing historical importance of fire on the Sierra landscape.

Response: Mechanical thinning of forest stands can support a number of forest management objectives and considerations, including ecological restoration (to meet structural and compositional desired conditions), forest health, hazardous fuels reduction, carbon sequestration, wildlife habitat enhancement, socioeconomic (such as stewardship funding opportunities), climate adaptation (for example, increasing resilience to moisture stress), and community protection. These objectives are described in the "Desired Conditions" section of the forest plan under "Terrestrial Ecosystems," "Animal and Plant Species," "Fire," "Timber," "Watershed Conditions," and other sections. The analysis of mechanical thinning as an effective restoration tool is evaluated primarily in the "Agents of Change" and "Terrestrial Ecosystems" sections of the final environmental impact statement. This includes the discussion of strategic mechanical thinning to support the increased pace and scale of restoration with wildland fire (for instance, prescribed burning, wildfire managed for resource objectives) in fire-adapted forest ecosystems of the planning area.

7099

Management should emphasize controlled burns, natural fires and defending homes and communities. Historic logging, group selection, salvage logging, road development and invasive species have caused concerns that can be best addressed by these approaches.

Response: All plan alternatives and objectives are based on current, peer reviewed science and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments including mechanical, prescribed and wildland fire managed for resource benefit. These activities also benefit wildland urban interface communities, infrastructure and historic and cultural values at risk. Alternative B-modified estimates at least 20,000 acres/decade of both mechanical and prescribed fire and 64,000 acres/decade of restoration fire related activities. While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need to consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (see record of decision).

7102

Grazing is not included (and it either needs to be evaluated or addressed as to why it is not included) in the plan direction for Strategic Fire Management Zones. Therefore the benefits of grazing on fuel reduction are omitted and may need to be added.

Response: An analysis of livestock grazing and the effects of grazing direction is found in chapter 3 of the Final environmental impact statement Benefits to People and Communities, Rangeland Products and Management.

7103

Chemical and other methods used to manage vegetation (for instance, competition control, invasive species) needs to be justified by scientific research to prove they

benefit all forest species. Throughout the plan there is reference to potential use of chemicals but not a comprehensive analysis of effects across all resource areas.

Response: The forest plan includes components that would guide the use of herbicides for vegetation management on the Inyo National Forest (INV-FW-GOAL-02; MA-RCA-STD-02, -03; MA-PCT-GDL-02; INV-FW-GDL-01; final plan, appendix D- Site Preparation, Release). All specific proposed actions to use chemicals for vegetation management and their potential effects on humans and the environment would be analyzed and approved at the project level.

Also see response to comment 7076.

7104

The plan contains objectives for timber harvest and mechanical treatments that should not be used for ecological restoration. The plans need to be revised to remove use of these activities. Destructive logging techniques have no place on our public lands. Logging must be banned.

Response: Desired conditions for vegetation are included in the final plan (chapter 2, “Terrestrial Ecosystems and Vegetation” section). Timber harvest is not a primary purpose for project implemented to maintain and enhance ecological restoration efforts; it is but one implementation tool to proactively meet plan desired conditions, goals and objectives. The generation of forest products is a secondary benefit of these projects, providing personal use and commercial fuelwood/sawtimber opportunities timber is one of many resources managed for on National Forest System lands. The extraction of forest product on National Forest System lands is guided by many laws (Multiple Use Sustained Yield Act, others). Timber harvest is but one tool used by the Forest Service to help maintain forest health and reduce hazardous fuel loading and is an allowable activity.

Forest plans are intended to guide management of the national forests so they are ecologically sustainable and contribute to social and economic sustainability while providing people and communities with a range of benefits. Effects of forest vegetation treatments would be disclosed in project-specific environmental analysis. All specific proposed actions for vegetation management and mechanical treatments and their potential effects on humans and the environment would be analyzed and approved at the project level. Use of logging techniques would be determined at the project level.

7106

The plan must include standards limiting the maximum size for openings that may be cut in one harvest operation, according to geographic areas, forest types, or other suitable classifications. Section 219.11's requirements have not yet been met here because the logging proposed is not consistent with protection of wildlife in the forests.

Response: As stated in appendix D of the final plan, the methods of treatment to be used are primarily “thinning” and “group selection.” The plan originally included even-aged management as an alternative regeneration method in site-specific conditions. However, since the analysis showed desired conditions could be met through use of thinning and group selection (uneven-aged management), even-aged management regeneration techniques was removed from the final plan as a possible treatment method.

7107

Group selection is not defined in the draft plans and instead a generic definition is provided only in the draft environmental impact statement. This definition is incorrect, however, as it asserts that group selection mimics disturbance processes when in fact it removes trees and does not create snags or downed wood, which disturbance processes create. Include an accurate description of group selection in the Plans and the environmental impact statement.

Response: In the forest plan, appendix D, Timber Suitability and Management, it says:

The projected management approach uses uneven-aged management systems. Thinning will be the primary practice, with group selection implemented as the regeneration method. Thinning is used to increase individual tree vigor, increase horizontal heterogeneity, and reduce fuel hazards. Group selection will be used to regenerate suitable lands, increasing vertical heterogeneity and tree species diversity.

Under Timber Harvest in this same section of the plan and in the final environmental impact statement, appendix A it says, "Group selection is the most common method used to regenerate an age class. All, or most, of the trees are removed, followed by the establishment of seedlings. The size of the opening is variable, but is designed to provide sufficient site resources for favorable seedling establishment and growth."

In the same section of the final environmental impact statement, it gives the definition of group selection as follows:

This is the anticipated regeneration method to be used. Groups of trees are removed and seedlings are established within areas that may range up to 3 acres.

In the final environmental impact statement, Benefits to People and Communities – Forest Products and Management it says:

Treated areas would be managed primarily with variable density thinning, which is an approach that selectively removes trees to increase spatial and structural variation, while retaining selected elements or biological legacies (large/old trees, snags, and logs) in a desired arrangement (such as aggregated in clumps, dispersed in a uniform pattern)… Group selection openings would generally be small areas between 0.5 to 3 acres in size where most or all trees are removed to facilitate the establishment of a new age cohort. Group selection generally mimics historic disturbance processes by regenerating approximately 15 percent of the forested stand, increasing heterogeneity across the landscape and contributing early seral regeneration patches, within an overall uneven-aged landscape (Franklin et al. 2002; North et al. 2009; North 2012).

The last sentence has been edited to now say, "Group selection when used in combination with variable density thinning, generally mimics historic disturbance processes…"

The effects of thinning at the landscape scale using both GTR 220 (North et al. 2009) concepts in combination with group selection mimic natural processes.

7108

The Plans are lacking in guidance on the appropriate use of group selection, because when applied inappropriately it can degrade habitat quality for some at-risk species.

Group selection must be addressed in the Plans and impacts of group selection must be analyzed in the draft environmental impact statement.

Response: The final plan (appendix D, "Vegetation Management Practices" section), provides guidance for the appropriate use of both thinning and group selection for the management of vegetation and habitat types.

The final environmental impact statement (chapter 3, Benefits to People and Communities, Forest Products and Management) addresses group selection as a means for creating and maintaining forest heterogeneity.

7109

The planning rule states: (4) Where plan components will allow clearcutting, seed tree cutting, shelterwood cutting, or other cuts designed to regenerate an even-aged stand of timber, the plan must include standards limiting the maximize size for openings that may be cut in one harvest operation, according to geographic areas, forest types, or other suitable classifications (36 CFR 219.11 (d)(4), emphasis added) We ask that you revise this section to be consistent with the planning rule and clearly state that even-aged management such as clear cutting, shelterwood, seed tree and other even-aged practices are not consistent with these plans.

Response: See response to comment 7106. As stated in appendix D of the final plan, thinning treatments will be primarily used. We included Even-aged management as an original regeneration method in site-specific conditions. However, analysis showed desired conditions could be met through the use of thinning and group selection (uneven-aged management), so even-aged management was removed from the plan as a possible treatment type.

7110

There should be no even-aged management (for instance, clear-cutting, creation of "tree plantations").

Response: See response 7106, 7109. The analysis showed desired conditions could be met through the use of thinning and group selection (uneven-aged management), so even-aged management regeneration treatment was removed from the plan as a possible treatment type. If necessary, group selection will be utilized as the means to create younger stand components (reforestation efforts), from .5 to 3 acres in size (final environmental impact statement, chapter 3, Benefits to People and Communities, Environmental Consequences).

7112

Surface and ladder fuels reduction should be emphasized to make communities safer and forests healthier.

Response: The final plan includes plan components to reduce surface and ladder fuels, protect communities, and increase forest health (MA-CWPZ-DC-01 and 02; MA-CWPZ-GOAL-01 and 02; MA-CWPZ-STD-01; MA-CWPZ-GDL-01 and 02; TERR-FW-DC-01, 02, 06, 08, 09).

7113

Thinning should emphasize small diameter trees. Removal of large trees does not mitigate wildfires (no best available science information).

Response: There are several plan components designed to emphasize the thinning of smaller sized trees and retention and enhancement of larger sized trees in forest ecosystems, such as TERR-FW-STD-01 (retain live conifers 30 inches in diameter or larger during mechanical harvests) and TERR-BLCK-GDL-01 (retain large hardwoods greater than 12 inches in diameter during mechanical, prescribed fire, or salvage operations).

See response to comment 7284 regarding plan components that retain and protect large diameter trees, as well as conditions associated with the selective removal of large diameter trees (TERR-FW-STD-01).

See response to comment 7285 for a discussion of reasons for removing medium diameter trees and response to 7287 for a discussion of best available science information pertaining to tree diameter limits for retention versus removal. Additional language was added to the final environmental impact statement (final environmental impact statement, Ecological Integrity, Terrestrial Ecosystems, "Terrestrial Ecosystem Processes and Functions, Old Forests" section) that clarifies that the limited removal of large trees during restoration is designed to achieve specific objectives, such as to protect and promote the health of even larger and older trees (but not to mitigate wildfire risk).

7114

Vegetation management should not have diameter limits that can impede achieving desired conditions (for instance, heterogeneity, seral stages, wildlife habitat, resilience). A diameter limit should be based on best available scientific information, which is lacking in the draft environmental impact statement. The inclusion of diameter limits appears purely political.

Response: See response to comment 7287 regarding best available science information (best available science information) pertaining to diameter limits. An evaluation of diameter limits in vegetation management is provided in the final environmental impact statement Old Forests Supplemental Report (final environmental impact statement, Old Forests Supplemental Report, "Risk and Uncertainty of Large Tree Densities" section). We expanded this section to include additional best available science information documentation and tradeoffs associated with the analysis of strict diameter limits, diameter limits with exceptions, and no diameter limits (for instance, Use of desired conditions for large tree densities and old forests). This section clarifies that the use of diameter limits may influence some ecological characteristics of forest stands but not others, and that there are tradeoffs with respect to operational constraints, socioeconomic considerations, and climate change considerations. "Political" concerns are not expressly included in the analysis of diameter limits but are rather considered a type of socioeconomic consideration.

7115

Natural snag creation needs to be emphasized more. Competition induced mortality should be encouraged and will result in both snags and structural complexity important for certain wildlife species (for instance, woodpeckers, California spotted owl, etc.).

Response: Numerous final plan components (chapter 2, "Terrestrial Ecosystems and Vegetation" section) support and emphasize sufficient snag densities for wildlife habitat including TERR-OAK-DC-01; TERR-DMC-DC-06; TERR-MJF-DC-04; TERR-RFIR-DC-07; TERR-LDGP-DC-

02, 06, and 11; TERR-OLD-DC-03, 05, and 06; TERR-CES-DC-01 through 03; TERR-FW-GDL-01 and 02; TERR-CES-GDL-06; and TIMB-FW-GDL-01. Desired conditions for snags and logs contributing to structural complexity inherently incorporate creation (through tree mortality), decay (via decomposition), and loss (through natural breakage, combustion, or mechanical removal). Natural snag creation, including competition- and drought-induced mortality, is also addressed in the final environmental impact statement (final environmental impact statement, Agents of Change, "Insects and Pathogens" section; final environmental impact statement, "Terrestrial Ecosystem" section).

7117

Plan direction on large logs in community buffers and wildfire protection zones need to be changed. Large logs are irrelevant to fire behavior (over 12 inches diameter). They should be left and avoided in controlled burning. There is no science to support issues with them.

Response: forest plan components related to snag and log densities in the Community Wildfire Protection Zone (for instance, MA-CWPZ-GDL-01c) are designed to ensure public and firefighter safety and reduce hazardous fuels within these zones. This includes densities of larger logs (greater than 12 inches in diameter) that frequently pose safety and hazardous fuels concerns for firefighting personnel working in close proximity to these structures. We updated the "Fire Management" section of the final environmental impact statement to clarify that hazardous fuels, including large snags and logs, may be treated to allow safer conditions for firefighters and the public. Additional supporting best available science information is provided.

7124

In the draft environmental impact statement, the analysis of fire versus mechanical treatment is misrepresented. It states that mechanical treatments create better spacing as if that increases ecological integrity.

Response: Alternative B-modified increases the use of wildfire managed to meet resource objectives (final environmental impact statement chapter 2, Alternative Description). The language concerning mechanical treatments has been clarified (final environmental impact statement chapter 3, Terrestrial Vegetation, Environmental Consequences).

7125

There is no clear description, basis or analysis of what kinds of treatments it would take to move vegetation from one fire regime condition class to another (for instance, restore). The implicit assumption that mechanical treatment alone can restore is invalid.

Response: Typically, managers use a combination of treatments to accomplish restoration objectives. In addition to mechanical treatment, alternative B-modified increases wildfire managed to meet resource objectives and also utilizes prescribed burning (final environmental impact statement chapter 2, Alternative Description).

7127

The only meaningful mechanical treatments are followed by prescribed fire.

Response: See response to comment 7125.

7128

Extreme fire behavior is caused by weather, not fuel conditions. Final environmental impact statement needs to disclose the effects of restored or treated areas and how fire behavior will change in these treated areas.

Response: Fire behavior is affected by both weather and fuel conditions (final environmental impact statement chapter 3, Fire Trends). See "Fire Trends" section in chapter 3 environmental impact statement for explanation on how applied treatments across the landscape will affect fire behavior, taking climate change into consideration. Several figures show the change in large fire size with different levels of restoration and the percent change in area burned at high severity with no treatment, 30 percent reduction, and 60 percent reduction (final environmental impact statement chapter 3, Fire Trends).

7130

The draft environmental impact statement (forest plans) fail to provide scientific research or data to show that thinning and logging can be used for restoration and fail to consider scientific research that shows that thinning and logging are harmful to the ecosystem.

Response: The final environmental impact statement (chapter 3, Revision Topic 2, Terrestrial Ecosystems), references how restoration treatments (mechanical, prescribed fire) in combination, can be highly effective at restoring forest structural features (canopy cover, tree density, heterogeneity) and resiliency of Plan terrestrial ecosystem and vegetation types. This section also describes how past practices and fire exclusion have altered current conditions away from the natural range of variability and desired conditions. The final environmental impact statement references many studies (North, Innes, and Zald 2007), (Collins, Moghaddas, and Stephens 2007), (Collins and Skinner 2014a) that show the combination of mechanical thinning and prescribed or wildfire managed to meet resource objectives are most effective in reducing vegetation density, restoring understory and overstory composition, and increasing heterogeneity This is especially true for understory composition. Many plants in the analysis area, which historically had frequent fire, are fire adapted (Fites-Kaufman, Bradley, and Merrill 2006), (van Wagtendonk and Fites-Kaufman 2006). Also see response to comment 7131.

7133

The analysis of the effectiveness of fuel treatments along strategic roads and ridges is inadequate. It did not address that they are ineffective in aiding fire suppression during wildfires with fire-atmospheric interactions and crown fire behavior. Large wildfires will inevitably burn no matter what amount or extent of fuels reduction occurs.

Response: Fuel treatments along strategic roads, ridgetops, and other natural and manmade features are designed to reduce the fuels in these areas, which can create more opportunities for larger prescribed fire units or provide tactical locations to manage future wildfires. Reducing vegetation in these areas lowers the probability of crown fire activity and can allow them to be used as strategic areas to control wildfires. The analysis in the final environmental impact statement states that crown fires in montane forest vegetation will still burn under severe fire weather conditions but that they are less likely where vegetation is less dense (chapter 3, "Terrestrial Ecosystems, Dry Mixed Conifer" section). The analysis in the final environmental impact statement also shows severe wildfire will be less frequent under alternatives B-D (chapter 3, Consequences Common to All Alternatives, "Fire Regimes and Fire as an Ecological Process" section), but it does not rely on the effectiveness of fuels treatments along roads and ridges for

this conclusion, rather on larger landscape level restoration activities using a mix of mechanical, prescribed fire, and wildfire managed to meet resource objectives that affect at least 40 percent of the landscape. It shows greater amounts of mechanical treatments in alternatives B and D in strategic locations would increase the likelihood of larger prescribed fires and managed fires to meet resource objectives in montane areas.

7134

Fuelbreaks are not effective and maintenance is an issue. They also cause environmental damage from use of toxic herbicides, additional heavy equipment, and cheatgrass spread. Cumulative impacts not addressed.

Response: While there is no mention of "fuelbreaks," the final plan (chapter 2, Fire, Desired Conditions, Goals, and Potential Management Approaches) does address several criteria with the intent for community protection. To more fully create areas more resilient to wildfire, adjacent private lands require treatments similar to treated NFS lands.

7135

There is a lack of clarity in the draft environmental impact statement about design, objectives and impacts of "fuels treatments" along roads and ridges (linear).

Response: See response to comment 7133.

7137

The draft environmental impact statement alternatives rely heavily (and unrealistically) on landscape-scale prescribed burning to accomplish fire management goals. Timber management must remain an important tool for reducing fuels and improving overall forest health. None of the alternatives presented offer sufficient information to assess the risks of continuing current direction, nor the benefits of (and need for) increased mechanical fuels treatment activities to enable greater use of fire as a future management tool.

Response: Timber management will remain an important management tool for reducing fuels and improving overall forest health in the final plan. Alternative A shows the risks of continuing with the current direction. Alternatives B, D, and B-modified show the effects of increase mechanical fuel treatments (final environmental impact statement chapter 3). All plan revision alternatives enable greater use of managed wildfire to meet resource objectives (final environmental impact statement chapter 2, Alternatives Description).

7138

Trade-offs between the benefits of prescribed fire (and thinning and fire) to species, watersheds and reduction in likelihood of large fires needs to be weighed with the short-term costs of smoke. Long-term sustainability is important.

Response: The final environmental impact statement (chapter 3, Revision Topic 1: Fire Management) analyzes use of prescribed fire (and mechanical treatments) versus wildland fire smoke concerns in the "Air Quality" section.

7140

There should be more quantitative and spatial analysis (especially at the landscape scale), including trade-off analysis (for instance, fireshed). The failure to include quantifiable resource information about range and timber resources in the forest plans

fails to fully inform the decision-maker and the public regarding current resource conditions and possible cumulative effects.

Response: The record of decision describes the resource management tradeoffs, relying upon the qualitative and quantitative analysis in the final environmental impact statement.

7141

The draft environmental impact statement analysis does not adequately disclose the environmental effects (for instance, soils, water quality, habitat) and effectiveness in influencing fire behavior that is expected for various fuel treatments.

Response: The "Ecological Integrity" section of the final environmental impact statement provides an analysis of the effects of fuel treatments on natural resources in the plan area. This includes an analysis of these effects on soils and water quality ("Water Quality, Water Quantity, and Watershed Condition" section), wildlife habitat ("Wildlife, Fish, and Plants" section), vegetation ("Terrestrial Ecosystems" and "Aquatic and Riparian Ecosystems" sections), and fire regimes and other agents of change ("Agents of Change" section). Additional information on the effects of fuel treatments on sensitive wildlife is provided in the Draft Biological Evaluation for Sensitive Wildlife, Fish and Invertebrate Species of the final environmental impact statement.

A discussion and comparison of the ecological effectiveness of mechanical thinning, prescribed fire, and other restoration treatments has been added to the "Agents of Change" and "Terrestrial Ecosystems" sections of the final environmental impact statement. Additional information pertaining to the effectiveness of mechanical thinning and other restoration treatments is provided in the Terrestrial Vegetation Ecology Supplemental Report and Fire Ecology Supplemental Report of the final environmental impact statement.

7143

Details on the timber analysis related to allowable sale quantity should be included (for instance, Classification and Assessment with Landsat of Visible Ecological Groupings system (CALVEG) types, Forest Vegetation Simulator model outputs for managed and unmanaged stands, acres treated by prescription).

Response: Rather than discussing allowable sale quantity (ASQ) at length, the current planning directives (FSH 1909.12 chapter 60) discuss projected timber sale quantity and projected wood sale quantity.

The final plan appendix D discusses projected timber sale quantity and projected wood sale quantity.

7144

The allowable sale quantity should not include any old growth forests.

Response: Rather than discussing allowable sale quantity (ASQ) at length, the current planning directives (FSH 1909.12 chapter 60) discuss projected timber sale quantity and projected wood sale quantity. Projected timber sale quantity includes volume from timber harvest, for any purpose, based on expected harvests that would be consistent with plan components. Plan components in the forest plan work together as a whole to meet the requirements of the 2012 Planning Rule (36 CFR 219.8 through 219.11). These plan components guide management to meet desired conditions for Old Forests described in the forest plan. These plan components include design criteria intended to protect Old Forest resources, and are applied at the project

level. For example, Forestwide (TERR-FW-STD) 01 says that for mechanical thinning harvests designed to treat fuels, and/or control stand densities, within the wildfire restoration and maintenance zones, retain all live conifer trees 30 inches and larger. Forestwide (TERR-FW-GDL) 01 says that projects should facilitate increasing heterogeneity at all scales. For more discussion about old forest plan components, see response to comment 7023.

7145

The National Forest Management Act of 1976 gives the Forest Service the ability to harvest timber on a sustained yield basis. This should be the objective of the Forest Service and the desired method of restoring our forests to the proper equilibrium.

Response: FSH 1909.12 (The Planning Directives) chapter 64.31 says, "The Responsible Official shall determine of the sustained yield limit as the amount of timber that could be produced on all lands that may be suitable for timber production, assuming all of these lands were managed to produce timber without considering other multiple uses or fiscal or organizational capability." Also (chapter 64.32) says, "The projected timber sale quantity is a subset of the projected wood sale quantity and is an estimate of the quantity of timber expected to be sold during the plan period…The estimation of both the projected wood sale quantity and the projected timber sale quantity must take into account the fiscal capability of the planning unit and be consistent with all plan components." The sustained yield limit is the potential contribution of lands that may be suitable for timber production. The projected timber sale quantity is the volume that a national forest estimates it can sell.

The final environmental impact statement chapter 3 Benefits to People and Communities, Forest Products and Management shows the projected 10-year timber harvest volumes by product type and alternative. Most importantly though, the final environmental impact statement says, "Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products. As such, current and projected sawtimber opportunities on the Inyo National Forest are projected to remain at the current level." The Planning Directives (FSH 1909.12) do not require the USFS to sell volumes equal to the sustained yield limit.

7148

The plans do not provide for an adequate pace and scale of vegetation management to sustain local forest product infrastructure. The related issues are not addressed in the plans or draft environmental impact statement.

Vegetation should be managed at a level to trend toward vegetative desired conditions and to contribute to sustaining local forest products infrastructure.

The plans need to be revised to increase the pace and scale to sustain local mills.

Response: The final plan (appendix D Timber Suitability and Management) reads "Forest management on the Inyo National Forest consists of restoration and fuels reduction treatments designed to achieve desired conditions for the associated terrestrial vegetation type on suitable timber lands. Most treatments would occur in the montane zone, with minor amounts in the upper montane zone. Thinning removes sawtimber and miscellaneous convertible products; however, due to proximity to mill facilities, most treatments yield fuelwood and specialty wood products." Additionally, the Inyo National Forest does not have any local biomass facilities.

The final environmental impact statement (chapter 3, Benefits to People and Communities, Forest Products and Management) says, "Due to the long distance between the Inyo National Forest and existing mill facilities, the vast majority of local processing of forest products is for fuelwood. Milling of timber resources for products other than fuelwood is currently minimal and limited to a few local individuals who manufacture items such as posts and poles, rough siding, arts and crafts, furniture, and other products. As such, current and projected sawtimber opportunities on the Inyo National Forest are projected to remain at the current level."

Also see response to comment 7207.

7151

The data used to determine the sustained yield limit calculation are not provided in the forest plans, making it impossible to evaluate and compare the relative outcomes of the alternatives in quantitative terms; therefore, include the following data in the environmental impact statement: total acreage of CALVEG types, acres by CALVEG type on suitable and unsuitable lands, existing stand and stocking information for existing CALVEG types, projected stand and stocking conditions by CALVEG type, or estimates of ecosystem outputs associated with land management activities.

Response: The directives (FSH 1909.12 chapter 60 part 64.31) say, "the Responsible Official shall determine of the sustained yield limit as the amount of timber that could be produced on all lands that *may be suitable* for timber production, assuming all of these lands were managed to produce timber without considering other multiple uses or fiscal or organizational capability…When determining the sustained yield limit, because the land that may be suitable for timber production does not vary by alternatives considered in the environmental impact statement for plan development or revision; the sustained yield limit calculation is a single constant for the applicable national forest. Because the sustained yield limit represents the potential of volume that could be harvested in perpetuity, it does not vary by decade or any other time period."

Since the sustained yield limit is constant and does not vary by alternative, it is not a figure that is useful when comparing alternatives. Final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management shows percent of cover type of lands suitable for timber production. Also provided in this section are the regional dominance types.

See 7233 and 7143.

7152

The allowable sale quantity estimates in the draft plans seem too low; therefore, provide a detailed description of the modelling and constraints that were applied at the landscape level that supports the current quantitative data and provide the silvicultural applications that would be applied over time.

Response: Directives (FSH 1909.12 chapter 60, part 64.32) say that estimation of both projected wood sale quantity and projected timber sale quantity must take into account the fiscal capability of the planning unit and be consistent with all plan components. Both the projected wood sale quantity and projected timber sale quantity should vary for each alternative considered in the environmental document. Estimates of projected wood sale quantity and projected timber sale quantity do not include any volumes anticipated for salvage or sanitation harvests.

Values for projected wood sale quantity and projected timber sale quantity could appear lower than the capability of the suitable land because of plan components or fiscal capability of the planning unit (as mentioned above).

See response to comments 7151, 7233, and 7143. See reviewer note.

7153

The forest plans fail to meet the economic needs of California's rural communities. With the exception of alternative D, the draft plans would not provide a sufficient timber supply to support the region's forest products infrastructure.

Response: See response to comments 7356 and 7207.

The final environmental impact statement (chapter 3, Benefits to People and Communities, Forest Products and Management) recognizes limitations on the Inyo National Forest's capacity to produce forest products: "Utilization of special forest products, personal-use and commercial fuelwood is generally anticipated to remain consistent with current conditions into the future, with minimal increases due to population trends."

7155

The draft environmental impact statement should go further and guarantee specific, yearly, harvest levels. Guaranteed harvest levels are the only way to ensure that private industry will not only be viable, but that they will make the necessary investments to maintain and expand upon current infrastructure.

Response: See response to comment 7356 and 7207.

The final environmental impact statement nor final plan is responsible for establishing guaranteed harvest levels. Timber volume sold goals are assigned to the national forest by the regional office, along with funding allocations.

7156

Affected Environment and Economic Conditions. The text should include the history of sawmill infrastructure and the associated consequences of lost sawmilling capacity, jobs, and annual payroll since the beginning of the current forest plans.

Response: The final environmental impact statement (chapter 3, Benefits to People and Communities, Forest Products and Management) discusses the history of timber production. This section stresses the importance of forest products infrastructure and acknowledges that the Terra Bella mill is the last remaining sawmill in California south of Yosemite National Park. It also mentions that while Terra Bella is the closest mill to the Inyo National Forest, haul distances of over 600 miles are often cost prohibitive. See response to comment 7356 and 7207.

7157

The (above) text should also include the annual timber harvest from the Inyo, Sierra and Sequoia National Forests during the life of the existing forest plans (for instance, 1988-present).

Response: As mentioned in response to 7156, the 600 miles haul distance to the Terra Bella mill makes the haul cost prohibitive for the Inyo National Forest. Most of the timber sold on the Inyo National Forest is for fuelwood, both commercial and personal use, and specialty products. The outputs are converted to board feet in the cut and sold reports from the national forests and

grasslands, but the products are processed mostly locally, not at a mill. For volume sold for the previous years, see the cut and sold Reports at: https://www.fs.fed.us/forestmanagement/products/cut-sold/index.shtml. Appendix D in the final plan reflects expected annual averages for outputs for the Inyo National Forest by decade.

7158

On p. 10 it does not mention that timber harvest is an economic benefit - is it not? Even if it is not a benefit, it is one of the uses.

Response: The final environmental impact statement, “Forest Benefits to People and Communities” section discusses economic benefits of timber harvest. The benefits of fuel wood gathering are also identified as a distinctive role and contribution of the Inyo National Forest (final plan, chapter 1).

7159

The timber suitability evaluation is flawed. A value is reported, but the assumptions and methods used to calculate that value are not reflected in the appendix or other documents. In particular, it is important to evaluate the land base that "may be suitable for timber production" in light of the recent effects of drought and climate change projections in the near future

Response: FSH 1909.12 chapter 60 (the planning directives), gives guidance for determining lands suitable for timber production. Please refer to the final plan, appendix D, Timber Suitability and Management and the final environmental impact statement, appendix A: Timber Suitability and Management for the determination of suitable lands. Lands that may be suitable for timber production were determined following the guidance in chapter 60 of the planning directives (FSH 1909.12 chapter 61).

There were some changes made to the determination of suitable lands between draft and final environmental impact statement and these are described in the final environmental impact statement, chapter 3, appendix A, but these changes were not made based on drought and climate change projections. Tree mortality due to these issues has not been as widespread as on the west side of the Sierra Nevada. Also see Response 7233 and 7160 for more information about the effects of tree mortality and the determination of suitable timber lands.

7160

There is no mention of "reforestation" of deforested lands from fire or insect mortality.

Response: We do not have a need for largescale reforestation efforts because deforested conditions from fire and insect mortality generally are not widespread. The final plan (appendix D) includes a section on reforestation as does the final environmental impact statement (appendix A).

Also, in the final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management):

While projected harvests are well below annual growth rates, the sudden loss of living conifers, over extensive acreages, may result in reduced yields in areas where mortality is high. Prompt and effective reforestation can reduce this effect, but, at least in the context of watersheds, be unable to provide sawtimber-sized trees for several decades.

Also, in the final environmental impact statement (chapter 3, Agents of Change):

Salvage logging after infestations can recover economic losses and create openings for reforestation, or improve overall human safety and recreational opportunities.

7162

Some of the areas designated in the plan as suitable for timber production are also areas that include pine marten dens, northern goshawk protected activity centers, and goshawk and marten breeding sites. Such areas should be removed from the suitable timber base in the final plan.

Response: FSH 1909.12 (chapter 60 of the directives) under 61.2 – Lands Suited and Not Suited for Timber Production Based on Compatibility with Desired Conditions and Objectives (step 2) says that the second step is to determine for each alternative in the plan environmental impact statement which of the lands that may be suitable for timber production (identified in step 1) are suited for timber production based on compatibility with desired conditions and objectives. In making this determination, the responsible official should consider the following to determine if timber production is compatible with the desired conditions and objectives of the plan:

Timber production is a desired primary or secondary use of the land.

Timber production is anticipated to continue after desired conditions have been achieved.

A flow of timber can be planned and scheduled on a reasonably predictable basis.

Regeneration of the stand is intended.

Timber production is compatible with the desired conditions or objectives for the land designed to fulfill the requirements of 36 CFR 219.8 to 219.10.

This is the step in the process where protected activity centers **may** be removed if desired conditions are not compatible with timber production. Lands removed from the tentatively (may be) suitable timber land base may be the same across all alternatives or differ for each alternative analyzed based on distinctions between alternatives. This also provides a point of comparison between alternatives.

The areas that you are interested in removing were not removed from suitable lands in this analysis (see final environmental impact statement appendix A: Timber Suitability and Management for a discussion on what lands were removed from lands suitable for timber production). Plan components provide desired conditions, standards and guidelines, and design criteria that are incorporated into project-level environmental analysis. Any planned timber harvests would be site-specifically designed to meet appropriate desired conditions for wildlife including SPEC-FW-DC-01. In the final plan, chapter 2, Animal and Plant Species, Sierra marten habitat is addressed in SPEC-SM-GDL 01 and 02.

7163

A very limited set of the lands were identified as "lands where management objectives limit timber harvest" (Sierra draft plan, p. 154). These include recommended wilderness areas, eligible wild and scenic river segments, and California spotted owl protected activity centers. The criteria used for designation was that timber production was not a primary or secondary objective. This ignores the remaining criteria that must be

considered, which are listed in 1909.12 FSH 61.2… The public must be able to review how each of these factors was considered for each land allocation in the revised plan, and an explanation of why lands are suitable for growing and logging a "regulated crop of trees" must be provided if any of these criteria are not met.

Response: The final plan (appendix D) has been clarified to show the removal of inventoried roadless areas (IRAs) and research natural areas (RNAs) as lands not suited for timber production. These lands were previously removed from the acre calculation, but this was not explicitly stated. Additionally, riparian conservation areas (RCAs) were removed in all plan revision alternatives from suitable timber lands as lands where management objectives limit timber harvest.

The criteria for lands suited and not suited for timber production based on compatibility with desired conditions and objectives (Step 2) (FSH 1909.12 chapter 61.2) are listed under the section titled “Lands Suitable for Timber Production” (final plan, appendix D) and the relevant land bases are shown in in a table titled Lands where management objectives limit timber harvest.

7164

Based on the plan components presented in the draft plans, riparian conservation areas, critical aquatic refuges, and great gray owl protected activity centers should be identified as "lands where management objectives limit timber harvest," and should therefore be considered not suited for timber production. Any lands where timber production is described as a "by-product" would not meet the criteria for suitability. Neither would lands managed for adaptive management because timber harvest beyond the first would be contingent on future learning.

Response: The timber suitability analysis was recalculated and results are shown in the final plan for alternative B and alternative B-modified (final environmental impact statement, chapter 2). Riparian Conservation Areas (RCAs) were removed along with Inventoried Roadless Areas (IRAs) and Research Natural Areas (RNAs). There are no great owl protected activity centers (PACs) on the Inyo National Forest. We agree timber production must be a desired primary or secondary use of the land (FSH 1909.12 chapter 61.2) to qualify as lands suitable for timber production.

7165

Suitable timber nearly doubled from the 1988 plan. Large areas in the Red fir belt are included, which citizens advocated for excluding during the 1988 planning process. There are also heritage concerns in suitable timber areas of the Jeffrey pine forest.

Response: The timber suitability analysis was recalculated (see response to comment 7164). However, the red fir vegetation type was not removed from lands suitable for timber production. Any purposed treatments in this or other vegetation types would be analyzed at the project level. Project purpose and need, and proposed action would need to be compatible with the desired conditions and other plan components in the final plan.

7168

The plan should be revised to recognize biomass as an important tool for proper forest management in green forests and dead forests.

Response: National Forest System lands can be an important fuel source for biomass facilities if located in proximity of fuel sources. Biomass utilization can be an important tool for reducing project-generated fuels, but on the Inyo National Forest, to date such infrastructure is currently

lacking in the local area. Final plan components (chapter 2, "Timber and Other Forest Products" section) include provisions for utilization of forest products.

A biomass feasibility study conducted by Mono County indicated a facility needed to be within 40-50 miles of a fuel source to be economically feasible (http://www.sacdm.net/tssconsultants/reports/2014-2-28-Comprehensive-Feasibility-Study-for-a-Heat-Power-Biomass-Facility.pdf). This study indicated biomass generated on the Inyo would need to be supplemented by fuels from other sources.

The Town of Mammoth Lakes submitted a Wood Innovations grant in 2017 and was successful in their application. Their plan is to install a Material Recovery Facility/Waste to Energy gasifier, which uses forest residues, cull wood, and dehydrated food waste as feedstocks. Their application projected using approximately 5,000 tons of forest waste annually. This project is at minimum, a few years from being online.

7169

The plans need to address the lack of biomass infrastructure and the economic benefits of utilizing woody biomass waste locally. This reduces the impact on forest service budgets of having to pay for transport of materials elsewhere. The plans should identify this problem and offer some specific actions that federal government could take with State, local and community partners to establish diverse and appropriately scaled uses. An example is the California BioMAT Program which requires a higher price be paid to new, small facilities qualifying for the program. North Fork, located near Sierra National Forest, has received millions of dollars from the State to plan and build one of the first qualifying BIOMAT projects.

Response: See response to comment 7168.

There are currently no biomass facilities on private lands within or adjacent to the Inyo National Forest. Increased restoration in the plan does provide the opportunity for biomass to support these types of facilities locally but many challenges exist. While their project is still in preliminary planning stages, the Town of Mammoth Lakes does plan on participating in the BioMAT (SB 1122) program. Final plan desired conditions (chapter 2, "Local Communities" section) support potential options to utilize forest products by communities.

7170

National Forests in California are overly dense with vegetation resulting in missed economic opportunity and increased risk to the public and environment. The opportunity to generate productive economic activity while improving forest health is being missed, while both our forests and our rural economies lose out.

Response: See responses to 7156, 7158, and 7168.

7171

The draft environmental impact statement lacks of any discussion of California's declining biomass power plant capacity. California's national forests have a large amount of wood waste from wildfire, insect and disease, and timber harvests. Without these power plants, this wood waste will have to be piled and burned. Accumulated wood waste from large fires or insects and disease contributes to greenhouse gases.

Response: See response to comment 7168. Prescribed burning is done in compliance with the Clean Air Act. Smoke effects on air quality is analyzed in the final environmental impact

statement "Air Quality" section, and carbon emissions are analyzed in the "Terrestrial Ecosystems" section.

7172

Without biomass plants, it is unclear how the USFS intends to increase prescribed burning levels when all forests within the region have a large backlog of prescribed burning. The draft environmental impact statement should be revised to incorporate more biomass treatments.

Response: See response to comment 7168. Alternative B-modified adopts a minor increase in prescribed burning. Rational for that increase is described in the Inyo National Forest vegetation objectives (February 2015) document in the project record.

7173

Biomass should not be an included treatment because of impacts to ecosystems, air and climate. Soil nutrients are removed, reducing forest growth potential. Carbon sequestration is reduced. Removal of small material will lead to more fire consumption of larger material causing more intense fires. The cumulative impact has not been analyzed.

Response: The final environmental impact statement Terrestrial Ecosystems section analyzes carbon stocks, sequestration, and stability, including cumulative effects. Further details can be found in the Carbon Specialist Report. Removal of small material does not lead to more intense fires. Our treatments will reduce fire intensity by removing surface and ladder fuels (final environmental impact statement, chapter 3, "Terrestrial Ecosystems Processes and Functions" section and "Wildland Fire Management" section).

7175

There should be no salvage and/or herbicide use to allow early seral habitat to develop for its dependent species (for instance, not plantations). Effects on native plant species and legacy structures (for instance, sprouting species) are not considered adequately.

Response: See response to comment 7176. Effects on native plant species and legacy structures are addressed in the "Complex Early Seral" section of the final environmental impact statement, chapter 3, "Terrestrial Ecosystems Processes and Functions" section.

7176

Salvage degrades forest ecosystems. Associated road construction, herbicide use should be greatly reduced.

Response: See response to comment 7311 for a discussion of final plan components relevant to complex early seral forest habitat (chapter 2, "Terrestrial Ecosystems and Vegetation" section). On the Inyo National Forest, no creation of permanent roads, nor use of herbicides have been part of previous salvage efforts. Any project-related temporary roads created were rehabilitated. All specific proposed actions for a salvage project and potential effects on humans and the environment would be analyzed at the project level.

7178

Areas with large diameter trees that burn at moderate or high intensity will not be protected. Large snags are high value ecologically and are important legacy structures. TERR-CES-GDL-6 insufficient and violates the planning rule.

Response: See response to comment 7311 for a discussion of plan components relevant to complex early seral forest habitat, including desired conditions and guidelines related to snag retention and complex early seral habitat protection.

7179

Flushing should be incorporated in the plan standards and guides. The trees may be alive, even though they have little live crown retention.

Response: Forest plans are intended to be strategic to identify long-term or overall desired conditions and offer general direction for achieving those desired conditions. All specific proposed actions for post-disturbance management/restoration and salvage and their potential effects on humans and the environment would be analyzed and approved at the project level. The response or condition of individual trees following disturbance are specific indicators of tree health and vigor that will be evaluated at the project level.

7180

Nothing about the plans seeks to support or protect CESF or reign in post-disturbance logging or artificial reforestation in a tangible, meaningful way. Proposed plan direction is too general.

Response: Desired conditions, (TERR-CES-DC) and guidelines (TERR-CES-GLD) for complex early seral habitats are addressed (final plan, chapter 2, “Terrestrial Ecosystems and Vegetation” section). In addition, protection measures such as Best Management Practices are built into project design.

The 2012 Planning Rule emphasizes that forest plans are intended to guide management of the National Forests so they are ecologically sustainable and contribute to social and economic sustainability while providing people and communities with a range of benefits, forest plans set up side boards for the work the Inyo does but it does not direct any specific place or project for that work. All specific proposed actions for vegetation management (post-disturbance logging or artificial reforestation) and their potential effects on humans and the environment would be analyzed and approved at the project level.

7181

Plan direction and draft environmental impact statement analysis does not consider the use and increased use of burned areas (mixed and high severity fire) and the impacts of salvage on these species.

Response: Restoring fire on the landscape is one of our main objectives with this plan revision effort. Salvage may be use as a management tool with provisions to protect wildlife and ecosystem function (final plan, TIMB-FW-DC 03).

7182

Develop standards for salvage logging that will protect habitat, soil and water resources

Response: Final plan components for complex early seral habitat (desired conditions, standards and guidelines) are found in chapter 2, "Terrestrial Ecosystems and Vegetation" section. All specific proposed actions related to salvage activities and their potential effects on humans and the environment would be analyzed and approved at the project level utilizing direction from the final plan.

7183

Salvage logging is mentioned specifically in several sections of the plan without sufficient detail to allow for a complete evaluation of the circumstances under which a salvage logging operation would be authorized.

Response: See response to comment 7182.

7185

Adverse impacts of grazing in post-fire recovery needs to be analyzed and prevented in riparian areas (and springs). The draft environmental impact statement must also provide a science-based direct, indirect, and cumulative effects analysis of the impacts to native plants and wildlife resulting specifically from competitive use

Response: The final plan includes new direction to address post-fire grazing (RANG-FW-GDL 01). Adverse impacts would be considered in project-level analyses. We have added an analysis of grazing impacts to the final environmental impact statement (chapter 3, Terrestrial Ecosystems, Aquatic and Riparian Ecosystems, and Forest Benefits to People and Communities).

7188

There are no economic justifications to salvage log areas that burn within natural range of variation and then implement industrial reforestation methods

Response: The final plan (chapter 3, Terrestrial Ecosystems) addresses retaining valuable areas during post-fire restoration: "During post-fire restoration projects, consider the availability of complex early-seral forests across the national forest and region to provide for ecological conditions needed by complex early seral wildlife species. This includes retaining areas of dense and connected patches of snags across a range of snag sizes; naturally regenerating vegetation; adjacent or intermixed burned and unburned areas; or areas with moderate to high tree survival."

The final plan (chapter 3, Timber and other Forest Products TIMB-FW-GOAL) directs the Inyo National Forest to adequately restock/reforest lands that are suitable for timber production within 5 years of salvage, if applicable, or site prep where salvage is not used. This goal does not limit reforestation to artificial methods. Site prep for natural regeneration could be utilized, or where site prep is unnecessary, it would not be implemented. Regeneration treatments would be implemented when funding is available. Forestwide (TIMB-FW-GDL-03) (chapter 3, Timber and other Forest Products) states that "on lands not suited for timber production, reforestation of deforested lands should be considered when forest cover could contribute to ecological restoration, while providing benefits such as improving scenic character, restoring connectivity for wildlife, increasing carbon storage and improving watershed condition."

Salvage efforts are not necessarily limited to production of sawlogs; efforts could potentially involve reduction of roadside hazards and making them available as fuelwood.

7189

The environmental impact statement does not adequately address the issue of tree mortality, the amount of tree mortality constitutes a changed condition as defined in NEPA; therefore, it must be addressed in the environmental impact statement analysis before a decision is made.

Response: See response 7216.

7190

Current science shows the danger of fire following bark beetle mortality is not as high as the draft environmental impact statement suggests.

Response: The numbers of dead and dying trees elevates the risk of wildfire and complicates efforts to respond safely and effectively to fires when they do occur. Science that supports this findings is available in the final environmental impact statement (chapter 3, Combined Effects of Climate, Fire, Insects, and Pathogens).

7195

In the environmental analysis, the Forest Service must address the landscape-wide decreases in the number and distribution of medium and large trees as a result of the mortality event and the associated increase in conflicts between logging and mature forest dependent species.

Response: The final environmental impact statement (chapter 3, Agents of Change) addresses recent past and current trend conditions, and projected future trends with regard to climate, fire and insects and pathogens.

While there has been some recent increase, the eastside of the Sierra has not suffered the widespread level of mortality the western slopes has. Most mortality has occurred in localized locations.

7196

The draft environmental impact statement fails to disclose accurate direct, indirect, and cumulative effects related to tree mortality in violation of NEPA.

Response: See response to comment 7195.

7197

Need for additional alternative to include proactive accelerated restoration harvesting to salvage and sanitize the forest to improve forest health, failure to consider such an alternative for the Sierra, Sequoia, and Inyo Plans violates NFMA and violates NEPA

Response: Alternative D (chapter 2, Alternatives) does this. Alternative D includes an emphasis on an increased pace and scale of ecological restoration, including improving the resilience of forests to fire, drought, climate change, insects, and pathogens. It emphasizes long-term habitat conservation by making areas more resilient to stressors, recognizing there may be short-term impacts to habitat associated with active management (final environmental impact statement, chapter 3, Benefits to People and Communities, Forest Products and Management, Consequences

Specific to Alternative D). Tree mortality on the Inyo National Forest is not as widespread as on the Westside of the Southern Sierra, so large scale salvage efforts are not applicable.

7198

The epidemic is an "issue" that serves as the basis for alternative development.

Response: See response to comment 7216.

7204

The vegetative conditions on the ground have changed due to tree mortality and all plan alternatives are inadequate to effectively address this issue, therefore, revise the restoration strategies and treatments in the proposed plans and alternatives to address the changed vegetative conditions. Plans should include ways to reduce the occurrences and impacts of future infestation.

Response: See response to comment 7216.

As addressed in the final plan (appendix D Timber Suitability and Management, Timber Harvest): *thinning is commonly applied to lower stand density and improve the health and growth rates of the remaining trees*. Thinning would be the primary type of treatment used for timber harvest. Desired conditions for basal area and canopy cover by vegetation type are shown in chapter 2 of the final plan (Terrestrial Ecosystems and Vegetation). The reduction of overall tree density across the landscape should reduce the likelihood of bark beetle infestations growing to epidemic levels within treated areas (final environmental impact statement, chapter 3, Insects and Pathogens).

7205

Include regeneration/reforestation to address tree mortality in the plans.

Response: Reforestation is addressed in the final plan (appendix D, Timber Suitability and Management, Reforestation). Reforestation is also covered in multiple sections in chapter 2 (Complex Early Seral Habitats (TERR-CES-DC-02), Timber and Other Forest Products (TIMB-FW-STD 01 and 02), and (TIMB-FW-GDL 01, 02, 03).

7206

Ramp up treatments to address increased hazard from tree mortality (for instance, near people)

Response: See responses to 7216 and 7197.

7207

Ramp up timber production to restore the landscape, provide raw materials to the local infrastructure, and support local economies.

Response: All of the alternatives analyzed (final environmental impact statement, chapter 2) would increase the pace and scale of restoration for mechanical treatments and prescribed burning over the existing condition (alternative A), except for alternative C. Alternative C does increase the use of managed fire over alternative A. Alternative B (and alternative B-modified) has the potential to increase mechanical treatments over current levels. Prescribed fire is increased some, but managed fire is greatly increased over current conditions. Alternative D increases the pace and scale the most of all of alternatives analyzed. The Inyo National Forest does not have local

mill infrastructure, but it does produce yields for personal and commercial fuelwood and specialty products.

The final environmental impact statement (Chap 3, Benefits to People and Communities, Forest Products and Management) recognizes limitations on capacity to produce forest products: Utilization of special forest products and personal-use fuelwood is generally anticipated to remain consistent with current conditions into the future, with minimal increases due to population trends. The ability ramp up production is also dependent upon a market for products.

7208

Restoration should include low impact mechanical treatment followed by prescribed fire (and leave some logs)

Response: The issue is consistent with direction in the final plan (FIRE-FW-GOAL 04, TERR-FW-GDL 02).

7210

Overstocking and lack of active management is the primary cause of mortality, not just "global warming" and bark beetle attacks, therefore increase the amount of active management proposed in the plans to address tree mortality.

Response: Alternative B-modified aims to increase active management to a reasonable degree (TERR-FW-OBJ 01 through 03). Also see the Inyo National Forest Vegetation Objectives document in the Project Record.

7211

Tree mortality has impacted wildlife and aquatic species habitat and those impacts have not been adequately considered in the plan components related to maintaining populations of at-risk species.

Response: The Inyo National Forest has not yet experienced tree mortality outside the natural range of variation (final environmental impact statement, chapter 3, Agents of Change, Insects and Pathogens). The final plan includes plan components related to maintaining population of at-risk species (SPEC-FW-DC-01 and 02).

7212

It doesn't appear that the impact of the insect and disease epidemic has been incorporated into the Monitoring Plan. Watershed conditions, terrestrial ecosystems, and aquatic ecosystems monitoring items do not have large wildfire and insect and disease as indicators of impacts on achieving desired conditions. "Key Indicators" on p. 108 do not recognize current conditions. Monitoring item(s) should be added.

Response: The final plan Monitoring Program found in chapter 4 lays out desired conditions, monitoring questions, and associated indicators related to these disturbances.

7214

Failure to comply with NFMA requirement that planning documents "provide for methods to identify special conditions or situations involving hazards to the various

resources and their relationship to alternative activities." 16 U.S.C. section 1604(g)(2)(C).

Response: The Inyo National Forest has not experienced the devastating and widespread effects of drought and insect related mortality that can be found on the Westside of the Southern Sierra. Some mortality is present, but it is localized primarily in the Mammoth and June Mountain areas. However, the following guideline regarding hazard trees and safety for workers is found within the final plan (chapter 2, Timber and Other Forest Products):

(TIMB-FW-GDL) 01 Retention of snags within and immediately adjacent to areas planned for reforestation should be discouraged to mitigate hazards to workers. High fuel levels should not be retained in plantations that would preclude the use of prescribed burning at appropriate times as the plantation matures.

Desired condition TERR-FW-DC-08 (chapter 2, Terrestrial Ecosystems and Vegetation) speaks to physical wellbeing of people.

See response 7229.

7215

Need for Change in the plans has changed, goal should be to save what is left of the forested areas by thinning, protect existing habitat, protect watersheds, safeguard recreationists and cultural areas and plan for reforestation

Response: See responses 7216 and 7229.

7216

The discussions within the plans pertaining to vegetative desired conditions, single species conservation strategy, desired conditions for terrestrial and riparian vegetation, prescribed fire, and watershed quality are not realistic as they do not reflect the current condition on these forests.

Response: The Inyo National Forest has not experienced the devastating and widespread effects of drought and insect related mortality that can be found on the Westside of the Southern Sierra. Some mortality is present, but it is mostly localized in the Mammoth Lakes and June Mountain areas.

7218

Tree mortality has impacted firefighting activities, safety of firefighters and communities, fuel conditions and potential fire behavior, and treatments needed in community wildfire protection zones. Increase active management now to prevent consequences later. Also, estimated amounts of prescribed burning in alternatives is suspect

Response: The plan includes management direction for Community Wildfire Protection Zones (CWPZ). These include desired conditions that address the need to have low fuel loading and less intense fire behavior adjacent to communities (MA-CWPZ-DC 01) and guidelines to address firefighter safety (MA-CWPZ-GDL 01 b. and c. and 02). Fuels and prescribed fire treatments are emphasized in the CWPZ. The effects of tree mortality on firefighters, fire behavior and vegetation can be found in the final environmental impact statement, chapter 3 in the “Fire Management” and “Ecological Integrity” sections. See also response to 7066.

7219

There's no indication how the proposed plan would make any significant improvement in the ecological, social or economic conditions created by tree mortality, therefore, revise the plans to address these impacts from tree mortality.

Response: See response to comment 7211.

7220

The Plans fail to address the exception in NFMA that allows sale of timber above the planned volume to combat insect epidemics.

Response: See response to comment 7226. Any salvage effort to capture value of materials would likely be included into the planned program of work for that particular year.

7221

The plans violate the NFMA regulations regarding sustainability and assessment of resource conditions.

Response: This is addressed in the final plan (appendix D). Also see response to comment 7226.

7222

The draft environmental impact statement and plans do not quantify the standing timber inventory, age classes or growth and mortality for the forests as required by the Land Management Planning Handbook. FSH 1909.12, Sec. 13.33. Omitting quantifiable resource information about timber resources prevents decision-makers from making an informed decision.

Response: This policy for developing forest assessments directs that we use available information. See the Inyo Forest Assessment for the available information that was evaluated related to timber. See appendix D in the final plan for information related to timber suitability and management.

7229

Tree mortality has created new public safety issues that are not addressed in the analysis and the plan components, therefore, revise the plans and analysis to address tree mortality related public safety issues.

Response: Tree mortality is not as substantial or widespread on the Inyo National Forest as it is on the west side of the southern Sierras. However, chapter 4 of the forest plan, "Sustainable Recreation" section, includes Forestwide (REC-FW-GDL) 06, which says that "within developed campgrounds, vegetation removal should promote visitor safety, scenic values and vegetation health." Vegetation removal would include hazard tree removal.

7231

Salvage logging should be conducted only to the extent required for safety reasons. Removing logs in both salvage and commercial timbering operations negatively impacts the soil due to the mechanical equipment necessary for the operation and creates new paths for illegal off road vehicle operation.

Response: The final Inyo forest plan, chapter 4, Design Criteria, contains plan components under Watershed Condition (WTR-FW-STD-01) and Complex Early Seral Habitats Guideline (TERR-CES-GDL-03); designed to limit soil erosion and protect soil productivity during forest

management projects. In addition, appendix B contains proposed and possible actions pertaining to maintaining soil productivity during soil disturbing Forest projects. Also, see response to comment 7182 concerning salvage.

7233

The omission of considering the current state of the forests with regard to tree mortality violates NFMA which requires "identification of the suitability of lands for resource management" and "obtaining inventory data on the various renewable resources" and using that data in forest planning. 16 U.S.C. section 1604(g)(2).

Response: For purposes of revising the Inyo forest plan, the process to determine the lands that are suitable for timber production has been completed and is included in the forest plan in appendix D. Timber Suitability and Management. A qualitative assessment of the forest vegetation on the Inyo National Forest indicates little significant change since the characterizations included in the initial plan. Further, the projected intentional management actions are unlikely to make a significant change.

The vegetation condition on the Inyo National Forest has not been greatly affected by the recent insect mortality that has impacted the Westside Southern Sierra National Forests. While the drought has affected the forest vegetation, it has, so far, been far less significant, as compared to the Sierra and Sequoia National Forests. For this reason, and because most of the timber volume sold is sold for personal and commercial fuelwood and specialty products, a re-evaluation of standing inventory, age classes, growth, and mortality was not conducted.

7236

Need cumulative effects analysis, given the large number of miles of ridges, roads, trails, and other natural and manmade features, of applying hazard tree removal, thinning, hand treatments, prescribed fire, and other restoration treatments extending out 150 to 225 feet from all sides from all of these features of each forest (Sequoia, Sierra, and Inyo); potential to cause extensive canopy cover reductions (in addition to the canopy cover reduction throughout the WUI that the Plans are enabling); and affects to habitat of Pacific fishers, California Spotted owls, Northern goshawks, and other species

Response: Each resource discloses existing conditions and evaluates cumulative effects in the final environmental impact statement chapter 3. Some of the suggested analysis is more appropriately completed at the project level.

7237

The plan and draft environmental impact statement do not recognize that areas that have undergone extensive tree mortality are now resilient to insects/and pathogens because there are the trees are naturally “thinned”. The plans and analysis do not reflect that they do not need restoration for resilience to insects and pathogens or drought (see also resilience table).

Response: See response to comment 7216.

7238

Riparian buffers need to be actively managed to prevent bark beetle tree mortality and act as wicks increasing spread of wildfire to achieve desired condition. [Also noted in Aquatic Strategy.]

Response: Plan components allow us to actively manage riparian areas (MA-RCA-DC 08 and 09).

7239

Climate change is not adequately analyzed and acknowledged in the draft environmental impact statement as the primary stressor affecting ecosystems in the plan area and all future management decisions; therefore, revise the environmental impact statement to acknowledge the substantial impacts of climate change.

Response: Climate change patterns, effects, and interactions with other stressors are addressed in chapter 3 of the final environmental impact statement and the Terrestrial Vegetation Resilience and Fire-Climate Supplemental Reports. The analysis of climate change and its ecological impacts are addressed in the "Agents of Change" section (climate change subsection) and "Ecological Integrity" section ("Terrestrial Ecosystems," "Climate and Ecological Vulnerability" subsection) of the final environmental impact statement (chapter 3). Additional effects of climate change are addressed in many other sections of the final environmental impact statement (for example, fire, watershed conditions, animal and plant species). We added language to the final environmental impact statement (final environmental impact statement; "Ecological Integrity;" "Terrestrial Ecosystems;" "Climate, Ecological Vulnerability, and Adaptation" sections) that emphasizes that climate change is a primary stressor that has a large-scale interaction with most other ecological stressors in the plan area.

7240

The Inyo, Sequoia, and Sierra national forests should declare a "climate change emergency" and take focused action to mitigate climate change.

Response: The forest plan and final environmental impact statement identify climate change as a primary agent of change and issue that requires focused attention. There are several forest plan desired conditions in chapter 2 that specifically address climate change as a stressor including WTR-FW-DC 01; TERR-FW-DC-02, 05, 06; TERR-SAGE-DC-02; TERR-PINY-DC-01; TERR-XER-DC-02; TERR-UPPR-DC-01; TERR-ALPN-DC-03; TERR-OLD-DC-01 and others. Moreover, the addition of specific climate adaptation strategies as plan components in the forest plan are covered in the response to 7251. chapter 1 of the final environmental impact statement identifies climate change as a primary stressor and issues related to ecological resilience, wildlife habitat, and wildfire (Issue 1); forest resilience and density (Issue 2); watershed restoration (Issue 4); aquatic diversity (Issue 5); and other topics. Chapter 3 of the final environmental impact statement specifically addresses climate change issues in a number of sections, especially the "Agents of Change" and "Ecological Integrity" sections.

7241

The cumulative effects analysis related to climate change in the draft environmental impact statement do not consider the influence of human-caused fires.

Response: The cumulative effects analysis section of the final environmental impact statement entitled "Combined Effects of Climate, Fire, Insects, and Pathogens" does include the consideration of both human-caused and natural (for instance, lightning) ignitions. This is

explicitly stated in the first paragraph of this section under the "Terrestrial Ecosystems and Cumulative Effects" subsections.

7242

The draft environmental impact statement does not address how climate change effects growth and survival rates of planted trees; therefore, add a discussion of measures to improve forest adaptation to climate change to the environmental impact statement, such as the selection of certain species for replanting and shifting seedlings from lower elevational bands to account for a warming climate.

Response: The possible selection of specific species or genetic stock for reforestation efforts, such as shifting elevation bands to account for warming climate, is broadly covered in the timber section of the forest plan (for instance, TIMB-FW-GDL-02). This timber guideline calls for the consideration of climate change and the future resilience of developing stands in reforestation efforts, which may include the possible selection of species or genetic stock from lower elevation seed zones. The final environmental impact statement does not specifically address changes in growth or survival rates of planted trees (regardless of the seed source), as this type of analysis is more relevant at the project scale.

We added a climate adaptation strategy focused on the selection of plant species or genotypes that are adapted to warmer and drier conditions to the final environmental impact statement (final environmental impact statement; "Ecological Integrity;" "Terrestrial Ecosystems;" "Climate, Ecological Vulnerability, and Adaptation" sections).

7243

The draft environmental impact statement analysis comes to the conclusion that the draft plans (specifically alternative A) are not flexible enough to respond to the rapid environmental changes resulting from climate change and related stressors, which is not consistent with the adaptive framework adopted in the planning rule that allows plans to be amended quickly to respond to changing conditions, such as climate change; therefore, amend the analysis to acknowledge this.

Response: The final environmental impact statement does conclude that alternative A will be the least supportive alternative of climate adaptation (summarized in table entitled "Rating of the amount of application climate adaptation strategies by alternatives"). However, alternative A would keep in place the management direction from the existing forest plan as amended, and it would not incorporate direction in the 2012 Planning Rule. In contrast, the final environmental impact statement does recognize that alternatives B and D do incorporate many climate adaptation strategies and are considered to be moderately supportive of climate adaptation (and alternative C to a lesser degree). Consequently, while alternative A would be less flexible to respond to climate change, alternatives B and D (and alternative C to some extent) are more flexible and consistent with the adaptive framework described in the 2012 Planning Rule. Some minor changes to the aforementioned climate adaptation strategies table of the final environmental impact statement has been made to better reflect these differences among alternatives.

7244

The plans rely on regional climate projections for the South Sierras to build a long-term forest management plan and these projections are known to be less accurate than global climate trend analyses; therefore, address this uncertainty and use this

information to select an alternative based on factors that increase resiliency to change rather than potentially inaccurate climate prediction modelling.

Response: The final environmental impact statement acknowledges that there is uncertainty in the climate projections of the analysis area as well as model projections related to fire regimes and vegetation. This uncertainty is noted in the assumptions section of the "Climate, Ecological Vulnerability and Adaptation" section and the Fire-Climate Supplemental Report. Also, the regional climate projections for the southern Sierra Nevada provided within these sections of the final environmental impact statement are largely consistent with the global climate trends and patterns described in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC 2013) report and other science-based sources (for instance, high certainty of increased warming but uncertain changes in precipitation). Lastly, information based on regional climate projections, their anticipated impacts to key resources and stressors, and the effectiveness of each alternative to respond to these combined stressors is analyzed in the "Climate, Ecological Vulnerability and Adaptation" section of the final environmental impact statement.

7245

The environmental impact statement should provide best available science information to support the analysis assumption that mechanical thinning treatments improve the resilience of forest ecosystems to climate change and related stressors, and it should consider other science that indicates frequent fire to increase climate change resiliency.

Response: The use of climate adaptation strategies, including mechanical thinning and use of wildland fire to increase the resilience of forest ecosystems, is supported by best available science information cited in the "Climate, Ecological Vulnerability and Adaptation" section of the final environmental impact statement (especially the "Analysis and Methods" subheading). These best available science information sources consistently demonstrate that mechanical thinning and the use of wildland fire can be effective at building adaptive capacity in Sierra Nevada forest ecosystems when these treatments are applied with attention to long-term ecological sustainability as described in the final environmental impact statement and forest plan. These thinning treatments support increased resistance and resilience of forest ecosystems to drought, insects, pathogens, and climate change.

7246

The draft environmental impact statement should assess the impacts of climate change on sage grouse habitat resulting from its interaction with other stressors (cheatgrass invasion, wildfires)

Response: The interactive effects of climate change, altered fire regimes, and cheatgrass invasion on sagebrush (for instance, primary sage grouse habitat) is covered in the Fire Trends section of the final environmental impact statement (including the cumulative effects section). As documented in this section of the final environmental impact statement, it is anticipated that the combined impacts of these interacting stressors would be greatest under alternatives with the lowest restoration treatment rates in sagebrush or sage-grouse habitat (for example, alternative A).

7247

The impacts of the alternatives on climate change were not adequately analyzed, in violation of NEPA; therefore, analyze, including a quantitative analysis and cumulative effects analysis, the emissions of each alternative and the impacts of those emissions on climate change. This needs to include a comparison of estimated net GHG

emissions and carbon stock changes projected from each alternative with short and long term potential for improving ecological fire resilience.

Response: A revised and updated quantitative analysis of carbon emissions for each alternative is provided in the Carbon Supplemental Report of the final environmental impact statement. This includes an analysis of carbon emissions (with and without carbon sequestration estimates) based on future projected changes in climate, wildfires, and forest ecosystem productivity within the entire Sierra Nevada bioregion. This represents an analysis of the cumulative and interactive effects of fire, climate, ecosystem productivity, and restoration treatments on carbon emissions in the bioregion. Carbon emissions are also depicted spatially across the entire bioregion and the southern Sierra Nevada in maps provided in the Carbon Supplemental Report. This provides a robust analysis of long-term carbon emissions factoring in the effects of interacting factors by alternative.

7248

Methane emissions from cattle grazing should be taken into consideration when quantifying emissions.

Response: Methane emissions from cattle grazing on the Inyo National Forest are not evaluated in the final environmental impact statement, because such emissions represent negligible and highly uncertain sources of greenhouse gases relative to those resulting from wildfires, anthropogenic sources (for example, emissions from fossil fuels extraction and use, landfills and waste), and management activities (for example, prescribed burning). This is underscored by the lack of reference to methane emissions produced by livestock in the PSW Science Synthesis (PSW-GTR-247; Long et al. 2012), Bioregional Assessment, Inyo Forest Assessment, and other best available science information sources.

7249

The effects of climate change are not sufficiently addressed in the draft plans. The plans need to be flexible, adaptive, and robust in order to effectively address the impacts of climate change.

Response: See response to comments 7240 and 7251

7250

Climate change monitoring is insufficient in the absence of any mandatory constraints on activities in the event that monitoring finds that desired conditions for climate resilience are not being met.

Response: Climate change monitoring is covered in “Climate Change and Other Stressors” section of the forest plan monitoring program. These monitoring questions and indicators track the status of several plan components related to terrestrial and aquatic ecosystem condition as well as fire regime trends in fire-adapted ecosystems. This climate change monitoring in the forest plan will provide for the opportunity to evaluate whether desired conditions for ecosystem sustainability and resilience are being achieved under warming climate trends.

7251

More specific climate adaptation strategies, such as those provided in Kershner (2014) should be included in the draft plans.

Response: Specific climate adaptation strategies have been added to or revised in the forest plan in several sections, including guidelines for (1) complex early seral, (2) sagebrush, (3) pinyon-juniper ecosystems (for example, consider future changes in climate and their influence on ecosystems in the affected area), and (4) reforestation (for example, consider carbon carrying capacity, climate adaptation, and future changes in climate). Other climate adaptation strategies were provided in the draft Inyo forest plan, such as the "forestwide" and "Terrestrial Ecosystems" sections. Some examples include: (1) restoration of key ecological processes (for example, fire); (2) carbon carrying capacity is improving or stable given trends in climate, fire, and drought; and (3) management for forest structural heterogeneity and mosaic of vegetation diversity. Several of these general climate adaptation strategies were derived from recommendations by Kershner (2014) and other relevant best available science information. There adaptation strategies and others are analyzed in the "Climate, Vulnerability and Adaptation" section of the final environmental impact statement (Terrestrial Ecosystems of Ecological Integrity).

7254

The Plans currently inadequately address carbon sequestration; therefore, they should be revised to include plan components that will optimize forest sequestration and mitigate the impacts of anthropogenic climate change.

Response: The forest plan contains several existing and new plan components that directly address carbon stocks and sequestration, including TERR-FW-DC-05 (carbon carrying capacity is stable or improving given climate and fire trends); TERR-FW-DC-08 (landscape suitability provides socio-economic benefits including carbon sequestration); TERR-CES-DC-02 and TERR-CES-GDL-01f (complex early seral management considers carbon carrying capacity); TIMB-FW-DC-03, TIMB-FW-GDL-02, and TIMB-FW-GDL-03 (post-disturbance management and reforestation consider carbon storage); TIMB-FW-STD-01 (regeneration harvest promotes carbon storage); INFR-FW-DC-02 (Management operations on the Inyo National Forest are energy-efficient); and timber potential management approaches (landscape scale projects protect forest carbon carrying capacity). Collectively, these plan components substantially contribute to the long-term management of forest carbon stocks, including management approaches that enhance carbon sequestration, to mitigate the impacts of anthropogenic climate change.

7255

There is a need to remove over half of the vegetation on the forest landscape to achieve a resilient condition and these reductions in vegetation, along with wildfire and disease epidemics will result in a large carbon debt.

Response: See response to comment 7254.

7256

The Plans do not acknowledge the importance of unlogged old growth and mature forests for carbon sequestration, including the relatively high degree of carbon sequestration in large-diameter trees

Response: The forest plan contains several plan components that recognize the value of large trees for carbon sequestration and other ecosystem services, including TERR-MJF-DC-06, TERR-OLD-DC-01 through 05, TERR-FW-GDL-01 and 02, and TERR-OLD-GDL-01 and 02. In

addition, the Carbon Supplemental Report of the final environmental impact statement ("Assumptions" and "Carbon Stability" sections) documents the importance of large trees for increasing carbon stocks and carbon sequestration in the planning area. The carbon supplemental report also discusses the importance of retaining and promoting the growth of large trees in forest restoration treatments that are designed to increase rates of carbon sequestration in forest ecosystems.

7257

The plans need to emphasize the importance of thinning of smaller trees which reduces fuel loads, reduces high severity wildfires and associated emissions, and increases the growing space for large trees, increasing carbon sequestration.

Response: There are several plan components in the forest plan that emphasize the thinning of small trees for the purposes of achieving multiple ecological restoration objectives, including fuel reduction, stand structure restoration, and carbon management objectives. These plan components include TERR-FW-GDL-01 (increase proportion of large to small trees) and Potential Management Strategies under Fire (increase ratio of large to small trees) and Timber (encourage use of small trees and wood biomass to support a variety of uses). Additionally, the Carbon Supplemental Report of the final environmental impact statement (assumptions and carbon stability sections) discusses the importance of removing the proportion of small trees and enhancing the proportion of large trees in forest landscapes of the plan area.

7258

The plans should recognize the importance of timber harvest in retaining carbon in the form of long-lasting wood products.

Response: The forest plan does include plan components that recognize the importance of timber harvest and associated wood products, including TIMB-FW-STD-01 and 02 (tree harvest and reforestation provides a variety of ecosystem services, including forest products and carbon storage). Carbon stored in wood products derived from timber harvest or biomass used in energy production to displace carbon emissions (including biomass wood chips for energy production) are discussed in the Carbon Supplemental Report ("Carbon Stability" section) of the final environmental impact statement.

7259

The plans should emphasize the utilization of wood products or chips for bioenergy

Response: See response to comment 7258.

7260

Increased pace of restoration proposed under the forest plans will result in greater wood waste. Due to the declines in biomass power plants, much of this material will need to be burned on site rather than transported and used in a controlled biomass facility that can reduce carbon emissions. The draft environmental impact statement and forest plans should be revised to discuss the current decline in the biomass power plant industry which makes mechanical forest treatments even more difficult to achieve, and the associated emission issues.

Response: See response to comment 7168.

Increased pace and scale fell under alternative D; alternative B-modified is being brought forward as the preferred alternative (final environmental impact statement, Summary, Alternatives Analyzed).

The Inyo National Forest has an active personal use fuelwood program. Besides limbs and tops, much of what is provided to the public in wood collection areas is removed as firewood for home heating.

We perform prescribed burning under regulations enforced by the Great Basin UAPCD. We obtain a permit annually from this agency for these activities.

7261

There is an inadequate analysis in the environmental impact statement of the carbon sequestration of each alternative, which violates NEPA; therefore, quantify the impacts of each alternative, including cumulative effects, on Carbon sequestration.

Response: See response to comment 7247.

7262

The forest plan lacks best available science information that supports the claim that more logging and fuels reduction leads to greater carbon sequestration.

Response: See response to comment 7245.

7263

The environmental impact statement analysis does not include the impacts of large wildfires since 2009 that have affected the carbon stocks and the amount of ongoing carbon sequestration.

Response: The carbon emissions analysis provided in the Carbon Supplemental Report of the final environmental impact statement has been updated and includes large (greater than 500 acre) wildfires from 1970 to 2014. The effects of these wildfires on forest carbon stocks are discussed in this supplemental report (Carbon Supplemental Report, Analysis Results, “Carbon and Carbon-Related Emissions” section) and the final environmental impact statement (final environmental impact statement; Ecological Integrity; Terrestrial Ecosystems; Terrestrial Ecosystem Processes and Functions; “Carbon Stock, Sequestration, and Stability” section).

7264

The carbon sequestration analysis needs to acknowledge the importance of carbon pools associated with snags, downed logs, and soils.

Response: Carbon stocks associated with dead trees (both standing snags and fallen logs) and soil carbon are included in the carbon analysis of the Carbon Supplemental Report of the final environmental impact statement. These carbon sources are presented in the “Background,” “Analysis Assumptions and Methodology,” “Important Information Evaluated in this Phase,” and “Carbon Stability” sections of the supplemental report.

7265

The carbon sequestration analysis needs to acknowledge the importance of frequent small managed wildfires for maintaining long-term carbon stocks.

Response: The importance of wildfires managed for resource benefit and prescribed fire (for instance, "use of wildland fire") for stabilizing long-term carbon stocks are discussed in the Carbon Supplemental Report of the final environmental impact statement ("Carbon Stability" section).

7252

There are very few plan components (especially desired conditions, standards, and guidelines) that consider climate change adaptation in a specific or meaningful way.

Response: See response to comment 7251.

7253

Resiliency in the face of climate change is a concern, from at-risk species conservation, to forest health and fire regimes, to water availability and the health of aquatic systems that support our communities and recreational economy. Again, we rely on the technical expertise of the USFS and INF to ensure management direction is sufficiently robust in the context of climate change.

Response: We agree that resilience to climate change and other stressors is of primary concern to many natural, cultural, and economic resources covered in the forest plan. In support of climate adaptation, the forest plan incorporates many adaptive plan components that are covered in the response to 7240 and 7251. The "Climate, Ecological Vulnerability and Adaptation" section of the final environmental impact statement also evaluates these many climate adaptation strategies by alternative.

7266

The 2012 Planning Rule's substantive ecological sustainability provision requires the Forest Service to formulate plan components, including standards and guidelines, to maintain or restore ecological integrity which includes "plan components to maintain or restore…connectivity" of terrestrial and aquatic ecosystems and watersheds, taking into account stressors such as climate change. 36 C.F.R. section 219.8(a)(1). There are three main areas of justification for structuring land management around corridors and habitat connectivity: maintenance of ecosystem function; preserving wildlife movement patterns and the resource availability these patterns facilitate; and mitigating the effects of climate change on species and ecosystems. The information provided in appendix 5 represents the best available science, which the 2012 planning rule requires the agency to utilize. 36 C.F.R. section 219.3

Response: The record of decision discusses consistency of the final plan with the Planning Rule substantive requirements. See the final environmental impact statement for a discussion of habitat connectivity (chapter 3, Revision Topic 2 Ecological Integrity). See the Science Consistency Review Report (December 2016) administered by the USDA Forest Service Pacific Southwest Research Station for an evaluation of the best available science used in the environmental impact statement.

7268

Habitat connectivity for wide-ranging forest species (bear, deer, fisher) and sagebrush obligate species (sage- grouse and other sagebrush-dependent species) is analyzed in

the draft environmental impact statement (p. 205-207), however the relationship to plan components and management direction to maintain or improve connectivity should be made clearer.

Response: See response to comments 2084 and 7019.

7269

Draft environmental impact statement analysis of connectivity was incomplete. It did not include reference to the Essential Habitat and Connectivity Project (CA state agencies).

Response: The California Essential Habitat Connectivity Project information was incorporated into the "Terrestrial Ecosystem Processes and Functions" section of the final environmental impact statement and the Terrestrial Connectivity Supplemental Report of the final environmental impact statement. This was one of the primary sources of information used to evaluate habitat connectivity for wildlife and plant species in the planning area and southern Sierra Nevada. Additional reference to the Terrestrial Connectivity Report of the final environmental impact statement was added in the section pertaining to the Inyo National Forest, to underscore the importance of this information for evaluating habitat connectivity in the planning area.

7271

Analysis, description and best available science information underlying Focus Landscapes is incomplete (for instance, size, proportion needed to treat).

Response: Focus Landscapes are not part of the Inyo forest plan, but were incorporated in the Sierra and Sequoia Draft forest plans. Consequently, there are no plan components related to Focus Landscapes in the Inyo forest plan, and there are no analyses and best available science information associated with Focus Landscapes in the final environmental impact statement.

7272

Focus landscape locations need to be disclosed, floating locations allow for blanket exception to plan components protecting species.

Response: See response to comment 7271.

7273

Reduced habitat protections for species like fisher and CASPO would not maintain suitable post-treatment conditions. There is no limit on how many focus landscapes might be designated or little limit on their size. Cost-benefit not meaningfully analyzed. Viability will not be maintained.

Response: See response to comment 7271.

7274

Draft environmental impact statement is flawed because the marten discussion refers to Focus Landscapes and in the glossary these areas only refer to restoration of fisher and CASPO habitat.

Response: See response to comment 7271.

7275

If the intent is that focus landscapes serve as adaptive management study areas, they must be identified at this time as not suitable for timber production because a sustained yield of timber volume cannot be predicted (FSH 1909.12 61.2).

Response: See response to comment 7271.

7276

Plan direction on old forest needs to be modified or improved. The plan is not clear on how connectivity or management of old forests at the landscape scale will be guided by the plan.

Response: There are several plan components in the forest plan that contribute to habitat connectivity for old forest dependent species, including TERR-OLD-DC-02 (landscape provides habitat and connectivity for a variety of old forest-associated species), TERR-FW-DC-04 (landscape provides habitat and connectivity for a variety of species including specialists such as old forest-associated species), TERR-CES-GOAL-01c (added goal; restoring forested habitat to deforested areas, including restoring connectivity), and TIMB-FW-GDL-03 (reforestation of deforested lands should be considered when forest cover could contribute to restoring connectivity for wildlife). In addition, old forest connectivity at the landscape scale under the plan is addressed in the Terrestrial Connectivity Supplemental Report of the final environmental impact statement, including an evaluation of habitat connectivity for forest-dependent species (for example, marten, goshawk) in the southern Sierra Nevada.

7277

<u>Old forest emphasis areas are missing</u> and leaves old forest unprotected, therefore, add old forest management areas to the plans. Fire should be actively managed in these areas because it is a critical part of the ecosystem and important to long term survival of tree species. Logging and salvage should not occur in these areas.

Response: See response to comment 7023 for a discussion of old forest emphasis areas and old forests plan components by alternative as well as plan components that protect and retain large and old trees in old forests. For a discussion of wildfires managed for resource objectives by alternative in terrestrial ecosystems, including old forests, see response to comment 7334. The management of fire in old forest emphasis areas is also covered under the “Wildland Fire Management” section of the final environmental impact statement.

7278

The old forest plan direction is flawed because it is not integrated with efforts to increase habitat connectivity, restore ecological processes (for instance, fire disturbance and water purification), restore structure diversity and reduce species risk similar to the SNEP strategy (Franklin et al. 1996) including, a reserve strategy managing for natural disturbance regimes, standards and guidelines limiting removal of large trees across entire landscape, and standards and guidelines requiring retention of significant numbers of medium sized trees to provide for recruitment of future large trees.

Response: See response to comment 7023 for a discussion of plan components in the forest plan that protect and retain large and old trees in old forests. See response to comment 7276 for a discussion of plan components that support habitat connectivity among old and mature forests. For a discussion of wildfires managed for resource objectives by alternative in terrestrial

ecosystems, including old forests, see response to comment 7334. The management of fire in old forest emphasis areas is also covered under the "Wildland Fire Management" section of the final environmental impact statement. See response to comment 7285 for a discussion of the management and potential removal of medium diameter trees.

7279

The linkage of desired conditions are unclear for old forests (landscape scale) in relation to those for seral stages and CESF (for instance, table 4 and 7).

Response: The definition of old forests was clarified as a mature forest containing large and old trees in the forest plan ("Old Forests" section) and final environmental impact statement ("Terrestrial Ecosystems" section). This clarification recognizes the linkage between the information presented in table 1 (amount of seral stage patches by vegetation type) and Table 4 (large and old trees), whereby old forests represent a subset of specific conditions (large and old trees) within mature forests (for instance, mature stand conditions that also contain residual large and old trees often derived from pre-settlement conditions). Therefore, the proportion of old forest will not exceed the proportion of mature forest within a landscape.

As noted in the forest plan and "Terrestrial Ecosystems" section of the final environmental impact statement, complex early seral habitat is a type of early successional forest. In contrast, old forest (as noted above) is defined as a mature forest with old/large trees that represents a later successional stage (often several or more decades later) than early successional forest. Consequently, there is no direct linkage between old forests and complex early seral forests. Rather, complex early seral habitat represents a subset of early seral forest that may be linked to the early seral proportions provided in Table 1 (amount of seral stage patches by vegetation type). Similar to old forest and mature forest, the proportion of complex early seral habitat will not exceed the proportion of early seral forest within a landscape.

7281

Desired conditions are good for old forest but without other plan components (for instance, standards and guides) there is no assurance that the threats to old forest will be ameliorated and the desired conditions achieved. There are conflicts with group selection and timber plan direction.

Response: Utilization of goals, objective, standards and guidelines is intended to move the forest landscape towards the listed desired conditions in the final plan (chapter 2, Terrestrial Ecosystems and Vegetation).

Old forest structure on the Inyo historically was open and more resilient to natural disturbances. A mosaic of structure and density occurred across the landscape. Past management practices has caused some of this heterogeneity to be lost. The overlap of Old Forest Desired Conditions (final plan, chapter 2 Terrestrial Ecosystems and Vegetation Old Forest within Montane and Upper Montane Zones), and group selection and timber harvest as an implementation tool can move these areas towards desired conditions.

See response to comment 7280 regarding potential conflicts with the timber section.

7282

Plan direction is lacking on the scale to evaluate desired conditions for large trees. This means that logging in project areas with many large trees will be diluted across

evaluation of the entire analysis area or forest. The scale for evaluating the desired conditions needs to be specified and not left up to projects.

Response: Desired conditions for large and old tree densities in old forests is provided in the table entitled "Large and/or old trees at landscape scale, except where high severity fires have occurred" in the "Old Forests" section of the forest plan. The specific definition of landscape scale relevant to this table is provided in the "Terrestrial Ecosystems Desired Conditions" background section of the forest plan (for instance, areas greater than 10,000 acres). To further clarify the spatial scale of these desired conditions, this spatial scale information was inserted into the heading of this table for large and old tree densities.

7284

<u>There should be a diameter limit</u>. No large trees should be logged (protect the health and home ranges of many vulnerable species such as black-backed woodpecker, goshawk etc.) (Usually 24-inch diameter mentioned in Inyo National Forest form letters). Managed fire should be used to manage.

Response: Different diameter limits were considered in the alternatives analyzed in the final environmental impact statement. These included alternative A (30" diameter limit across all areas), alternative C (emphasis on removing smaller diameter trees less than 16 to 24 inches in diameter but with a diameter limit of 30" for firs and incense cedar and 27" for pines, with minor exceptions), alternative B and B-modified (30" diameter limit with limited exceptions based on TERR-FW-STD-01), and alternative D (no diameter limit in all Fire Management Zones).

Managed wildfire is encouraged in alternatives B, C, and D but not A (final environmental impact statement, chapter 2).

These alternatives provide an opportunity to evaluate the effects of different diameter limit scenarios and other associated vegetation management approaches (for example, use of wildland fire) on various resources and values. The analysis of these alternatives on wildlife species and their habitat (especially at-risk species) is presented in the Wildlife and Terrestrial Ecosystems sections (under Ecological Integrity) of the final environmental impact statement. This analysis indicates that alternative B and B-modified, followed by alternatives D then C will benefit terrestrial wildlife species by balancing short- and long-term habitat needs of a number of wildlife species, including those at-risk. Alternative A provides the least benefit to terrestrial wildlife especially in the long-term, indicated by a low adaptive capacity and susceptibility to stressors. Additional information comparing the use of strict diameter limits, diameter limits with exceptions, and no diameter limits are presented in the Old Forests Supplemental Report of the final environmental impact statement ("Risk and Uncertainty of Large Tree Densities" section).

Although alternatives B and B-modified provide no diameter limit in the Community and General Wildfire Protection Zones, they do emphasize large tree (individual and clump) retention and enhancement (SCEN-FW-OBJ-01 and 02, and TERR-OLD-GDL-01) to protect large and old trees during mechanical thinning projects in forest ecosystems. Desired conditions for large tree densities in forests are informed by the Natural Range of Variation in specific forest types (TERR-OLD-DC-01 to 05, TERR-MJF-DC-06).

7285

Lack of protection for 30 inch trees in the fire protection zones puts them at risk and there are few left, therefore, add some standard and guidelines that would protect large trees in fire protection zones. Removal of medium sized trees (for instance, greater than

16 inches in some comments) do not pose a fire risk and should not be removed for economic reasons only and will degrade habitat (for instance, reduction of canopy cover for owls).

Response: See response to comment 7284 regarding plan components that retain and protect large diameter trees, especially under alternative B and alternative B-modified.

The removal of medium diameter trees (roughly 14-24 inches in diameter) may support a number of forest management objectives and considerations, including ecological restoration (to meet structural and compositional desired conditions), forest health, crown fuels reduction (and ladder fuels reduction in some circumstances), carbon sequestration, wildlife habitat enhancement, socioeconomic (such as stewardship funding opportunities), climate adaptation (for example, increasing resilience to moisture stress), and operational safety. These objectives are described in Desired Conditions (final plan, chapter 2, "Terrestrial Ecosystems," "Animal and Plant Species," "Fire," "Timber," "Watershed Conditions" sections). The analysis of the removal of small to medium diameter trees and their benefits to forest ecosystems is evaluated in the "Agents of Change" and "Terrestrial Ecosystems" sections of the final environmental impact statement.

7286

<u>No exceptions.</u> No trees over 30 inches should ever be cut because there is the possibility that commercial interests will be put above the environment and endangered species. The operability exception is easily misinterpreted and can lead to logging large trees.

Response: See response to comment 7284 regarding plan components that retain and protect large diameter trees, especially under alternative B and alternative B-modified.

As noted in the "Benefits to People and Communities" section of the final environmental impact statement and the Economics Supplemental Report, timber activity on the Inyo National Forest is minimal compared to the Sierra and Sequoia, and the few, small commercial operations on the Inyo are restricted to producing fuelwood for local use. Consequently, no trees greater than 30 inches in diameter, and relatively few large trees (between 24 to 30 inches in diameter) are removed (only to meet residual structure characteristics) for commercial wood products in forest restoration projects involving mechanical thinning on the Inyo National Forest.

The exception to meet the needs of equipment operability in TERR-FW-STD-01 is required to insure human safety during mechanical thinning operations in all forest projects.

7287

Diameter limit of 30 inches is not based upon best available science information, therefore, reconsider the science that discusses diameter limits.

Response: A summary of the best available science information related to diameter limits has been added to the Old Forests Supplemental Report of the final environmental impact statement under the Tree Retention by Diameter and Multiple Forest Restoration Objectives heading. This addition explains the scientific uncertainty revolving around diameter limits and clarifies the importance of considering multiple restoration objectives (for example, hazardous fuels reduction, wildlife habitat) when evaluating success. The comparison of different diameter limits associated with various alternatives is provided in the Old Forests Supplemental Report (Restoration Approaches around Large, Old Trees in Old Forests subheading) and the "Terrestrial Vegetation" section of the final environmental impact statement.

7288

The diameter limit should be lower (most trees greater than 20 inches and all trees greater than 24 inches).

Response: See response to comments 7284 and 7287. Additional information and supporting best available science information were added in the Old Forests Supplemental Report of the final environmental impact statement ("Risk and Uncertainty of Large Tree Densities" section), which addresses ecological tradeoffs of lower versus higher diameter limits (such as 12 to 24 inch versus 30 inch limits). This includes the influence of diameter limits on wildfire risk, understory cover, water yield, habitat diversity, overstory species composition, and other stand variables.

7289

Only trees under 12 inches should be cut. There should be no logging of medium and large diameter trees. Group selection and even-aged logging should not be allowed. They are contrary to the mandate to maintain or restore key characteristics associated with ecosystems, communities and at risk species.

Response: See response to comment 7284, 7285, 7287, and 7288 regarding rationale for the selective removal of trees larger than 12 inches in diameter (for instance, medium and large diameter trees). Also see responses for 7107, 7108, 7109 for discussion of the ecological benefits of group selection as a restoration approach and even-aged management. Even-aged management is not available as a silvicultural system.

7290

There should be <u>no diameter limit</u> because it prevents the reduction of stand density for forest health and ability to increase pace and scale. The prescription should dictate the size of tree to be removed.

Response: See response to comment 7284. A discussion of the influence of diameter limits on forest health and the pace and scale of forest restoration is provided in the "Terrestrial Vegetation" section of the final environmental impact statement and the Old Forest Supplemental Report as noted in response to 7287.

7291

There is no scientific basis that large trees need to be removed for fire hazard reduction. Mature trees are rarely, if at all, hazardous fuels.

Response: See response to comments 7287 and 7288.

7292

No increase in logging. Do your fuels work, for instance: get rid of some of those small trees and leave the stuff over 24 inches alive and in the forest where it belongs.

Response: See response to comments 7284, 7287, and 7288. There are many plan components that address fuels management including but not limited to FIRE-FW-GOAL-01, AIR-FW-DC-02, TERR-MONT-DC-02, TERR-CES-DC-02, TERR-CES-GOAL-01b and 03, TERR-DMC-DC-02, TERR-JEFF-DC-02 and 07, and TERR-LDGP-05.

7293

Live medium and large trees are more important now that there has been extensive mortality. The Forest Service should consider that trees that survived the drought could

be genetically more resistant to drought. This is not addressed in the current plan direction or draft environmental impact statement.

Response: See response to comment 7048.

7295

There is no best available science information to support a 12-inch diameter limit for hardwood species.

Response: The 12-inch diameter limit for hardwood species in the forest plan is based on the need to maintain sufficient basal area of black oaks and canyon live oaks for wildlife habitat (for example, fisher conservation strategy) and Tribal resource use. The best available science information and other supporting documentation that informs this guideline (TERR-OAK-GDL-01) is provided in the "Terrestrial Ecosystems" and "Heritage Resource" sections of the final environmental impact statement.

7297

Appendix E provides an estimate as to the amount of group selection likely to occur, there is no plan component to ensure that amount and thus it is useless for protecting large trees. Until standards and guidelines are established that prohibit removal of medium and large trees, the plans will violate NFMA and NEPA. Section 219.11's requirements have not yet been met here because the logging proposed has not been demonstrated to be consistent with protection of wildlife.

Response: The plan does include standards to protect large trees. The final plan (chapter 2, Terrestrial Ecosystems and Vegetation), TERR-FW-STD-01 states: *mechanical thinning harvests specifically designed to treat fuels, and/or control stand densities, within the wildfire restoration and maintenance zones, retain all live conifer trees 30 inches in diameter or larger, except to meet the needs for equipment operability*.

The final environmental impact statement (chapter 3, Consequences Specific to alternative B-modified) says that while allowed, it is unlikely that medium sized trees would be removed as follows:

It is assumed that there would be very limited if any removal of large trees during restoration. The same restrictions on removing trees greater than 30 inches in diameter in west side forests applies to eastside forests (TERR-FW-STD-01). Because of the drier conditions, it is more likely that medium-diameter trees (greater than 20 inches diameter) are old and these could be removed, but it is unlikely. The final plan (appendix D) says that thinning will be the primary practice, with group selection implemented as the regeneration method. The Plan only gives an estimate of the area treated by each harvest method because the exact acreages are determined at the project level.

7299

No quantitative information is included on the measure of the proportion of the landscape having large trees (for instance, Table 50 draft environmental impact statement). Canopy cover is not included as a criterion for old forests.

Response: Qualitative analysis of the proportion of forest landscapes having large trees is included in the section on "Environmental Consequences to Terrestrial Ecosystem Processes and Functions" of the final environmental impact statement (under Old Forests). The Old Forests Supplemental Report of the final environmental impact statement (under Proportion of Landscape

with Old Forest Structures) provides additional information pertaining to the proportion of the landscape having large trees. Moreover, the Southern Sierra Nevada Wildfire Risk Assessment Vegetation Condition Assessment Report provides information related to the proportion of the forest landscape in late seral condition by vegetation type (an indicator related to but separate from the proportion of the landscape having large trees).

Canopy cover was not listed as a strict criterion for old forests, because this forest metric is not strongly associated with old forests in the Sierra Nevada or planning area. Rather, as discussed in the Old Forests Supplemental Report, old forests historically contained a variable mixture of open and closed canopy structures arranged at various spatial scales within the forest landscape mosaic. For a more thorough analysis of the proportion of canopy cover classes by seral-structural class, vegetation type, and current vs. reference conditions, see the Vegetation Condition Assessment Report.

7300

Assumptions in draft environmental impact statement about large tree removal are at odds with what is allowed by the draft plans. There are unsupported claims and assumptions (not in plan components or analysis) about retention of large trees that are the basis for old forest and old forest wildlife analysis. The impacts of logging are underestimated, especially because there are competing plan components (for instance, TIMB-FW-OBJ 01), and timber discussion about regeneration harvest (group selection).

Response: See response to comments 7284 and 7287 regarding analysis and supporting information of large tree retention in old forests.

Plan components for old forest (for example, TERR-OLD-DC-02; old forest for wildlife habitat) and timber (for example, TERR-FW-OBJ-01; provide timber for local forest products), are not in direct conflict, because these plan components and others may be achieved on a larger landscape following project-level analysis. The final environmental impact statement (final environmental impact statement, Old Forests Supplemental Report, “Risk and Uncertainty of Large Tree Densities” section) evaluates the best approach for balancing and achieving multiple, potentially-competing management objectives by ensuring that desired conditions related to old forests, timber management, and other plan desired conditions and objectives are met across the analysis area. This balanced approach supports ecological integrity, wildlife habitat management, human safety, and socioeconomic desired conditions and objectives in old forest ecosystems.

7301

The wildlife habitat analysis in the draft environmental impact statement is inadequate. It is tiered to the vegetation analysis and is too general and has many potential impacts stated as “if” some management activity is applied in a certain way. The analysis needs to be better supported and more definitive. The interpretation of management activities is too vague and changeable.

Response: The final environmental impact statement analyzes effects to wildlife habitat from potential management activities allowed under the final plan. Forest plans provide general direction for management and don’t direct or authorize specific activities to occur on the ground; therefore, the final environmental impact statement must analyze potential impacts, rather than specific impacts.

7304

Include standards and guidelines for snag recruitment and retention in plan.

Response: The final plan includes plan components that address snags (TERR-FW-STD 01, TERR-FW-GDL 02, TERR-CES-DC-02 and 03, TERR-CES-GDL 02, TERR-OLD-DC 01 through 06, TERR-OLD-GDL-01 and 02, as well as Desired Conditions for the ecosystem type portions of the "Terrestrial Ecosystem and Vegetation" section in chapter 2 of the final plan).

7305

Standards should also prohibit the practice of plantation reforestation and have DBH limits to protect the last remaining old growth trees and snags on our forest.

Response: See response to comment 7284 for a discussion of diameter limits in old forests. See response to comment 7304 for a discussion of snag plan components.

The final plan includes plan components that allows reforestation in certain circumstances (TERR-CES-DC 02, TIMB-FW-GDL 02 and 03). Artificial reforestation would occur in some very limited areas (about 1 percent of the burned area on the Inyo National Forest), and it is often limited in scope and area to locations where it is safe and relatively accessible for workers and feasible to prepare mineral soil seedbeds for planting trees. There would be increased consideration of artificial regeneration in some areas burned in extensive large patches of high-severity fire, where there are insufficient living seed trees to ensure enough seedlings will regenerate a forest.

There are other situations that reforestation (both artificial and natural) may be used. These are areas that are harvested with the group selection method where small opening are created in the forested stands and we are required by NFMA to reforest the area. Here, reforestation helps to initiate the development of a new age class of trees within older stands, providing structural diversity within the stand that is valuable to many species of wildlife.

7306

It is not clear how further harvest of old-growth trees creates desirable conditions for wildlife, recreation, or increasing resilience to large fires.

Response: The analysis of old forests is provided in the "Terrestrial Ecosystems" section of the final environmental impact statement and Old Forests Supplemental Report. This analysis and others (for example, "Wildlife and Plants" section) evaluate the effects of vegetation management proposed under each alternative on key resources, such as old forests, at-risk wildlife species, and ecosystem resilience to uncharacteristically large and severe wildfires. This analysis of old forests explains that alternative B-modified does not focus on the harvest of large and old trees. Rather, it emphasizes the thinning of smaller diameter trees and retention of larger diameter trees within the Natural Range of Variation to support higher large tree densities, a greater representation of larger trees in forest stands, and more resilience in managed forest ecosystems. For more specific information of large tree retention by alternative and plan components that protect large trees see response to comments 7284 and 7285.

7307

There is no way of knowing you are not cutting down the tree that would have lasted hundreds of years to provide oxygen and clean air forever, so this way of managing fire danger should BE MINIMIZED AT ALL COSTS....

Response: See response to comment 7306 for a discussion of the analysis of old forests under each alternative (especially the proposed action). For a review of old and large trees, including restoration approaches that protect and promote old trees in old forests, see the Old Forests Supplemental Report in the final environmental impact statement.

7310

The definition of CESF in the plans is not based on the best available scientific information. Salvaged and artificially reforested areas should not be included. The definition is ambiguous and there is no ecological rationale for this ambiguity. The plans appear to have determined that economic value exceeds the ecological value and is more important than moving the landscape towards desired conditions.

Response: The definition for complex early seral forest as provided in the glossary of the forest plan and final environmental impact statement is clearly defined and based on the best available science information, including several sources provided in the References section of the final environmental impact statement (for example, Swanson et al. 2010, Noss et al. 2006). There is no reference in this definition to sites that undergo management actions, such as salvage logging or reforestation, nor is there reference to economic value. Rather, only ecological descriptors are provided in this definition. Ecological complexity is explicitly defined with respect to structure, composition, and function. The definition in the forest plan and final environmental impact statement was further refined to provide additional clarity and linkage to the best available science information.

7311

The forest plans and draft environmental impact statement do not reflect the large body of scientific evidence that CESF is a rare and unique forest type that is highly important wildlife habitat and not "fuel." The forest plans advocate for widespread logging of snag forest habitat, mainly as "fuel" and commodities. This includes recent suggestions to expedite logging of snags due to potential for increased fire severity/spread. This is not supported by science. The importance of "pyrodiversity" is not incorporated. The analysis and plan direction do not reflect variation in CESF by forest type and pre and post-fire or disturbance conditions. The analysis does not reflect this diversity and the higher likelihood of salvage logging larger trees (greater than 20 inches) in some forest types over others.

Response: The forest plan provides many plan components for complex early seral forest (chapter 2, "Terrestrial Ecosystems and Vegetation" section), including TERR-RFIR-DC-04, TERR-LDGP-DC-02, TERR-CES-DC-01 to 03, TERR-SH-STD-01, and TERR-CES-GDL-01 to 06 as well as Terrestrial Ecosystems-Potential Management Approaches section (for example, during post-fire restoration projects, consider the availability of complex early-seral forests). In addition, several new elements under TERR-CES-GDL-01 were added to provide additional ecological considerations for ecological restoration projects in landscapes with large, stand-replacing events.

The "Terrestrial Vegetation" section of the final environmental impact statement provides a summary of the best available science information related to complex early seral forests and

variable fire effects (for example, "pyrodiversity") in forest landscapes, which has been updated with additional best available science information citations and information pertaining to: (1) the ecological benefits and importance of complex early seral forest (including for a diversity of wildlife species), (2) the benefits of pyrodiversity for increasing the diversity of plants and animal species, (3) the effects of post-fire management treatments on vegetation structure and composition, including understory plant diversity and surface woody fuel trends, (4) the specific forest types that are relevant as complex early seral forests in the plan area, (5) the specific forest types that experience most post-fire management activities (such as salvage logging) in the plan area and bioregion, and (6) whether complex early seral forests are "rare" in forest landscapes of the plan area as informed by the natural range of variation. This section in the final environmental impact statement and the Complex Early Seral Forest Supplemental Report clarifies that complex early seral forests are more common in the planning area than occurred under historic reference (for instance, Natural Range of Variation) conditions, and these sections provide a detailed analysis of the proportion of burned area that has been treated by salvage, reforestation or both and analyzed by forest type on the Inyo National Forest.

7312

There needs to be standards and guidelines in addition to desired conditions to ensure that CESF and their key characteristics are maintained, and to the degree necessary to support wildlife found therein such as black-backed woodpeckers, olive-sided flycatchers, and many other species. Need to have specifics of post-fire communities, such as differences by varying forest types (for instance, ponderosa pine, red fir), CWHR M and D types, temporal scales (for instance, 0-5, 5-10 years post-fire, etc.) and re-burn.

Response: See response to comment 7311 (above) for plan components related to complex early seral forest. Complex early seral forest is a type of special habitat that contributes to key ecological conditions for several Species of Conservation Concern. This habitat type is covered in the "Terrestrial Wildlife Habitat" subsection of the "Wildlife, Fish and Plants" section of the final environmental impact statement and the plan (Complex early seral habitats section). Differences in complex early seral forest by forest type are discussed in the "Terrestrial Vegetation" section of the final environmental impact statement and Complex Early Seral Forest Supplemental Report.

7313

Plan direction for the general wildfire protection zone are counter to conservation of CESF because the intent to use suppression and logging, ostensibly to stop/reduce high-severity fire, will result in negative impacts to CESF. Standards and guidelines must be developed to reflect the ecological value of these habitats in all zones because some vegetation types are only or mostly found in these areas (for instance, ponderosa pine and mixed conifer). (See b above). Similarly there is fire direction in the restoration zone that constrains managing wildfires that make it "unfriendly" to CESF. This is detrimental to CESF. Only the maintenance zone is acceptable to any degree for CESF. Standards and guidelines are missing for CESF in this zone though as well.

Response: See response to comment 7311 (above) for plan components related to complex early seral forest. Plan components for complex early seral forest are equally relevant and applicable to all of the wildfire management zones, including the wildfire protection zones. Similarly, multiple forest types are covered under these plan components.

7314

The only standard or guideline that is CESF friendly to any degree is vague and does not suffice as a meaningful guideline ("post disturbance restoration projects should be designed to protect and maintain important wildlife habitat"). What is "important" needs to be specifically addressed see c. above as well as in the context of specific species (see b. above).

Response: There are a total of six guidelines (TERR-CES-GDL-01 to 06) and one standard (TERR-SH-STD-01) relevant to complex early seral habitat. Of these seven standards and guidelines, all but two (TERR-CES-01a & f, -05) are devoted to ecological considerations rather than socioeconomic and safety concerns. This high proportion of standards and guidelines dedicated to maintaining ecological integrity and sustainability (including two standards devoted specifically to wildlife habitat needs) in complex early seral habitat underscores the emphasis placed on managing these areas based on ecological principles.

7315

Definitions and analysis of high fire severity are unhelpful and need to be redone. The ecological impacts of severe fire (for instance, upper half of moderate severity and high severity fire, greater than 50 percent BA mortality) depends on many factors (pre-fire conditions, post-fire conditions for instance, mature forest, logged or unlogged, forest type) and are not all acknowledged. The categories should be further split by pre-fire density and size (CWHR type), time since fire etc. The salvage and reforestation acres in the draft environmental impact statement and supplemental report need to be further refined to reflect these differences, differences in time since fire and forest type (for instance, lodgepole pine vs mixed conifer).

Response: The definition of fire severity and high vegetation burn severity is clearly defined, based on best available science information, and provided in the glossary of the final environmental impact statement. The ecological effects of fire of different severity classes are thoroughly presented in the "Agents of Change" ("Fire Trends") and "Ecological Integrity" sections of the final environmental impact statement and the Fire Climate, Fire Ecology, Terrestrial Vegetation Resilience, and Terrestrial Vegetation Ecology Supplemental Reports. Additional modeling information on wildfire effects to natural and other resources is presented in the Southern Sierra Wildlife Risk Assessment Report. See response to comment 7311 regarding categorizations by forest. Fine scale analysis of forest vegetation based on site conditions following stand-replacing events (for example, pre-fire conditions, time since fire) and associated management actions will be further analyzed at the project level.

The Complex Early Seral Supplemental Report of the final environmental impact statement does provide differences in post-fire management activities (for example, salvage) by ecological zone (for example, upper montane versus montane).

7316

Plan components for CESF conflict and therefore do not ensure ecological integrity will be provided (as defined by the 2012 planning rule), as discussed in length in our scoping comments. TERR-CES-GLD-3 (wildlife habitat) conflicts with TERR-CES-GDL 5 (economic recovery of timber). The plan fails to provide guidance for how project-level decisions should be made to balance multiple-use objectives. Deferring the decision to projects makes the outcome uncertain, suggesting the plan does not ensure ecological

integrity. Further, the guidelines are all ambiguous except 6, making further uncertainty.

Response: The 2012 Planning Rule emphasizes that forest plans are intended to guide management of the National Forests so they are ecologically sustainable and contribute to social and economic sustainability while providing people and communities with a range of benefits, consistent with Multiple Use Sustained Yield Act (15 Public Law 86-517) & National Forest Management Act of 1976 (P.L. 94-588) (77 FR 21187; final environmental impact statement, chapter 1, Introduction, Regulatory Direction, Plan Revision Under the 2012 Planning Rule). As such, forest plans provide a framework for integrated resource management and for guiding project and activity decision making. Plan components themselves do not compel agency action, authorize projects or activities, or guarantee specific results. Instead, they provide the vision and strategic direction needed to move the national forest toward ecological, social, and economic sustainability (77 FR 21208; final environmental impact statement, chapter 1, Introduction, Regulatory Direction, Plan Revision Under the 2012 Planning Rule).

Complex early seral plan components, such as TERR-CES-GLD-3 (wildlife habitat) and TERR-CES-GDL 5 (economic recovery of timber) or TIMB-FW-STD-02 (create and maintain planting environments that favor seedling survival and growth rates), are compatible objectives that may be integrated in a larger landscape following project-level analysis. This analysis at the project level would evaluate the best approach for balancing and achieving multiple, potentially-competing management objectives by ensuring that desired conditions related to complex early seral forests and other plan desired conditions are met across the analysis area. This process supports ecological integrity, wildlife habitat management, human safety, and socioeconomic desired conditions and objectives described in the forest plan following stand-replacing events.

Complex early seral forest guidelines clearly describe their purposes, such as specific considerations (for example, TERR-CES-GDL-01a: Safety to people in the short and long term) and project design criteria (for example, TERR-CES-GDL-02: Post-disturbance restoration projects should be designed to reduce potential soil erosion and the loss of soil productivity caused by loss of vegetation and ground cover.) These standards are clear, apparent, and flexible, as described in the 2012 Planning Rule (for example, guidelines differ from standards in that they provide flexibility for compliance; Section 22.14 - Guidelines).

7317

Salvage logging and reforestation criteria conflict with desired conditions and natural range of variation and therefore create conditions that are not resilient and do not provide ecological integrity. TIMB-FW-STD-2, TERR-CES-GDL-5. Areas that burn can be within natural range of variation, plantations can burn intensively and repeatedly, and are suffering from elevated tree mortality from bark beetles. Research indicates that naturally regenerated areas are likely to be better adapted to present-day climate and more adaptable to climate change.

Response: See response to comment 7316 related to potential conflicts between desired conditions in complex early seral forests. For a discussion of complex early seral forests and natural range of variation, see response to comment 7311. We revised TIMB-FW-STD-02 to be more compatible with plan components focused on complex early seral habitats (such as TERR-CES-GOAL-01). We also added best available science information (best available science information) in the final environmental impact statement (final environmental impact statement, Terrestrial Ecosystems, Terrestrial Ecosystem Processes and Functions, “Complex Early Seral Habitats” section) that clarifies that post-fire management activities (including salvage logging,

reforestation) have variable effects on post-fire vegetation, but these activities often support increased forest ecosystem integrity associated with desired conditions and natural range of variation . We also included best available science information that addresses the combined effects of climate change and high severity fire on tree regeneration probability in the absence of post-fire planting activities. The "Agents of Change" ("Insects and Pathogens") and "Ecological Integrity" ("Terrestrial Ecosystems") sections of the final environmental impact statement address the effects of tree mortality resulting from bark beetle activity and climate change adaptation in forest ecosystems.

7318

The CESF plan components that we provided to be considered in an alternative do not seem to be included in alternative C (from SFL). (These are repeated in this comment letter.) Includes major detailed topics (see comment for specifics) including: salvage restrictions, direction to manage for species (for instance, black-backed woodpecker) with specific direction (versus general), retention of larger trees, retention of snags in varied conditions, using climate projections for carefully planned and limited revegetation.

Response: In chapter 2 of the final environmental impact statement, alternative C was clarified to include greater salvage logging restrictions and maintenance of important habitat structures for wildlife species in complex early seral habitat. Alternatives B, B-modified, C, and D provide complex early seral plan components focused on the retention of snags and large trees and other residual structures designed to maintain ecological integrity. This was clarified in chapter 2 of the final environmental impact statement. An additional guideline (TERR-CES-01i: consider future projections in climate in restoration projects following stand-replacing events) was added under all alternatives (except alternative A) to ensure that climate projections would be considered in project planning within complex early seral forests.

7319

The analysis of CESF does not disclose the beneficial ecological effects of mixed-severity fires, including high severity effects and the adverse effects of attempted exclusion of high severity fire.

Response: We included additional best available science information (best available science information) pertaining to the benefits of complex early seral forest and mixed-severity fires (including high severity fire) in the final environmental impact statement (final environmental impact statement, Ecological Integrity, Terrestrial Ecosystems, Terrestrial Ecosystem Processes and Functions, "Complex Early Seral Habitats" section). Additionally, the existing best available science information related to the beneficial and negative effects of mixed-severity and high-severity fires (including the effects of fire exclusion of all combined severity classes) are provided in the "Agents of Change" ("Fire Trends"), "Ecological Integrity" ("Terrestrial Ecosystem Processes and Functions," including the "Complex Early Seral Forests subsection"), and "Wildlife and Plants" ("Terrestrial Wildlife") sections of the final environmental impact statement. Additional information is provided in the Fire Ecology, Terrestrial Vegetation Resilience, and Terrestrial Vegetation Ecology Supplemental Reports of the final environmental impact statement. In some terrestrial ecosystems and circumstances (for example, burning within the natural range of variation), these benefits may include increased biodiversity and habitat availability for species associated with more structurally complex early seral forest.

7320

The plans do not provide for adequate CESF. Should be more CESF, little to no salvage or reforestation Include restrictions on salvage logging to protect the complex early seral habitat that is created by fire and other disturbances.

Response: See response to comment 7311 for plan components related to complex early seral forest and current levels of this special habitat type in the planning area. The use of post-fire management activities (for example, salvage logging, reforestation) in complex early seral forest is addressed in 7316 and 7317.

7321

There is an institutional bias towards fire suppression evident in the draft Plans, therefore, reconsider the point of view that wildfire impacts are negative and acknowledge the benefits of wildfire (for instance, to societal or economic benefits as well as ecological resilience).

Response: There has been an intuitional bias towards fire suppression and, in many ways, a similar bias in our society at large. The National Cohesive Wildland Fire Management Strategy recognizes this bias and offers specific methods for moving past it (final environmental impact statement, chapter 3, Revision Topic 1, Wildland Fire Management, “National Cohesive Wildland Fire Management Strategy” section). The final plan seeks to restore fire to a more natural role by using it to meet resource management objectives in specific areas based on condition and location (final plan, chapter 3, “Strategic Fire Management Zones” section). The Risk Assessment identified these areas by considering the effects of wildfire (both positive and negative) on natural resources and human-made assets (final environmental impact statement, chapter 3, Revision Topic 1, Wildland Fire Management, “Analysis and Methods” section). The management of fires for resource benefits will be allowed in all Fire Management Zones (final plan, chapter 2, Management Areas, “Strategic Fire Management Zones” section).

Proposed activities consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and overall willingness to accept risk.

7322

Plans do not address underlying reasons why implementation of fire falls short of need. The plans need to be revised to include ongoing educational and training programs for agency staff to change the agency culture with respect to the importance of fire as the key element in the Sierra Nevada ecosystem

Response: This plan recognizes the importance of fire as an agent of change on the landscape. It does remove barriers to and enhance opportunities for the reintroduction of fire to a more natural role (final plan, chapter 3 Strategic Fire Management Zones). Proposed activities consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and overall willingness to accept risk (final environmental impact statement – Vol. 1, chapter 3).

7323

The plans are flawed because they attempt to continue fire size limiting exclusion objectives despite the fire deficit. This limits the desired ecological effects of fire that are emphasized in other portions of the plan and prevents reduction of the deficit.

Response: See response to comment 7340.

7324

The magnitude of fire restoration needed is not explained in sufficient detail, and specifics on what would be treated (including reference to available budgets and associated limits).

Response: The final plan includes the objective of at least 20,000 acres/decade of both mechanical and prescribed fire and 64,000 acres/decade of restoration fire related activities. While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (final environmental impact statement chapter 3, Revision Topic 1: Fire Management, “Wildland Fire Management, Background” section).

The final plan does not limit fire size, but focuses on the risk to resources (FIRE-FW-GDL 01).

The planning rule states that any plan component objectives must be based on reasonably foreseeable budgets (36 CFR section 219.73ii).

7325

The pace and scale of fire restoration is inadequate. Internal and external social and cultural barriers need to be addressed in the plans.

Response: The plan includes desired conditions to increase awareness and understanding about wildfire risk within communities and the need to adapt communities, properties and structures to wildfire while also recognizing that wildland fire is a needed ecological process (FIRE-FW-DC 05). The Planning Rule states that any plan component objectives must be based on reasonably foreseeable budgets (36 CFRsection219.73ii). All plan alternatives strive to increase the pace and scale of prescribed and wildland fires managed for ecological benefit and fire resilience. Alternative B-modified – at least 20,000 acres within 10 – 15 years (final plan, chapter 2, TERR-FW-OBJ 01, 02) and 64,000 acres/decade of restoration fire related activities (final environmental impact statement, chapter 3, “Agents of Change” section) was is the preferred alternative because it balances the need to consider to opposing constrains including budget, public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (see the record of decision).

7326

The FIRE-FW-DC calls out fire frequency as a key part of ecosystem function, health and sustainability but fails to describe acreage targets of fire use that accurately characterize (quantify) the fire regime need for the various vegetation types. This is a major failure in the plan. Need for "concise, measurable, and time-specific" rates of progress toward a desired condition focused on ecosystem integrity and sustainability.

Response: The final plan does include acreage targets; see response to comment 7324 for more information. The final environmental impact statement analyzes the effect on each alternative on

the fire regime in specific ecosystem types (chapter 3, “Ecosystem Processes and Functions” section).

The goal of ecological restoration is not to return the landscape to its historical fire regime (because such an outcome is not realistic with the extent of human influence), but instead to have forests that are sustainable and resilient to expected changes over time” (final environmental impact statement, chapter 3, Revision Topic 1: Fire Management, “Wildland Fire Management, Acknowledge the Ecological Role of Fire” section).

7327

The fire effects analysis in the draft environmental impact statement does not address studies that find that wildfires managed under suppression objectives, do not track well with natural range of variation, contrast greatly with resource objective wildfires which track well with natural range of variation, or the natural range of variation." The plans and draft environmental impact statement do not acknowledge this contradiction and arbitrarily suggest that fire suppression in wildlands is primarily about safety and asset protection.

Response: The “Fire Management” and “Terrestrial Ecosystems” sections of the final environmental impact statement acknowledge the ecological benefits achieved by wildfires managed for resource objectives (for instance, “managed wildfires”) as well as issues and concerns associated with aggressive fire suppression (for example, more severe and undesirable fire effects). These sections recognize differences in fire severity patterns between these fire management responses and the natural range of variation, citing Meyer (2015) in many instances. The “Fire Management” section of the final environmental impact statement provides an analysis of the fire effects by alternative that is often summarized in the “Restore and maintain landscapes through the use of wildfire” subsection. This analysis identifies the ecological and other benefits associated with increased levels of managed wildfires and reduced suppression wildfires associated with alternatives B and D (with fewer benefits achieved with the lower acres burned in managed wildfires under alternative A). Under all alternatives, it is accepted that individual wildfire suppression efforts can be necessary, under high-risk conditions (for example, extreme fire weather, burning adjacent to homes) to protect communities and natural resources from potential damages, including the impacts of fire effects outside the natural range of variation. However, flexibility in the range of fire management options available to decision makers varies greatly by alternative, as shown in the “wildfire management continuum” figures in the “Fire Management” section of the final environmental impact statement.

7329

Plans need to recognize the ecological importance of a variety of fire severities in shaping the landscape.

Response: In the forest plan, FIRE-FW-DC-03 (Wildland fires burn with a range of intensity, severity and frequency that allows ecosystems to function in a healthy and sustainable manner) recognizes the ecological importance of a variety of fire severities on the landscape. In addition, TERR-FS-DC-06 (Fire occurs within an ecological appropriate regime of frequency, extent, and severity, and enhances ecosystems) and associated fire severities by forest type (for example, TERR-MJF-DC-02, TERR-UPPR-DC-02) underscores the importance of a variety of fire effects burning within the natural range of variation across forest landscapes.

7330

The draft plans need to have a greater emphasis on science-based fire mitigation practices, including prescribed fire.

Response: The final plan includes plan components that mitigate the risk of negative wildfire impacts (see chapter 2, "Fire Plan Component" section, chapter 3, Management Areas, "Strategic Fire Management Zones" section).

7331

Desired conditions for CASPO, fisher and marten are inconsistent with desired conditions for fire severity and large patch size (for instance, up to 40 percent of area in high severity and up to 1,000 acre patch size).

Response: The final plan removed the language regarding 40 percent of area in high severity and up to 1,000 acre patch size. The final environmental impact statement contains a viability analysis for Species of Conservation Concern that shows that the plan is consistent with the conservation of the species (chapter 3, "Wildlife, Fish and Plants" section).

7334

Wildfires should be allowed to burn for resource benefit more than allowed for in the plans.

Response: The evaluation of estimated acres of wildfires managed for resource objectives is provided in chapter 2 under the Comparison of Alternatives by Restoration Activity (and associated estimated amounts of restoration activities by alternative per decade table). This evaluation determines that alternative D, followed by alternative B-modified, will result in the greatest number of acres of wildfires managed for resource objectives. Similarly, alternative D will result in nine times the acres burned in resource objective wildfires compared to current conditions, nearly an order of magnitude difference in these burned acres. Management for the greatest number of acres burned in resource objective wildfires is provided for in alternative D.

7335

The forest should move away from suppressing all fires to managing fires to reduce catastrophic fires. Mechanical restoration should be limited to surface and ladder fuel reduction.

Response: The final plan does move away from suppressing all fire and would use managed wildfire for resource benefit (see chapter 2, "Fire Plan Component" section, chapter 3 Management Areas, "Strategic Fire Management Zones" section). The final plan allows for both surface and ladder fuels reduction and also other necessary treatments, consistent with the best available science (GTR-220/237; final environmental impact statement, chapter 3, "Montane Forest Environmental Consequences" section).

7336

The distinction between fire restoration and fuels reduction as treatments are not distinguished in the draft environmental impact statement and the plans and therefore need to be revised.

Response: *Fire restoration* is a term that refers to the use of fire as a tool for restoration. *Fuels reduction* treatments can utilize many different tools including fire, mechanical, or hand

treatments to reduce fuels. These terms were added to the glossaries of the final environmental impact statement and final plan.

7337

There should be more prescribed fire and managed fire for ecosystem improvements.

Response: Use of fire as a restoration tool is increased under alternative B-modified (final environmental impact statement, chapter 3, "Agents of Change" section).

7338

Lack of clarity on the difference between fire management and fuels management. Fire management is broader and includes ecological benefits that are not encompassed by non-fire fuel treatments.

Response: The difference between fire management and fuels management was updated in the final environmental impact statement (chapter 3, Fire Management). These terms were also added to the glossary in the final plan.

7340

The draft environmental impact statement analysis is flawed because there is an emphasis on the effects of plan components that would limit fire size or result in fire exclusion are portrayed as a beneficial impact despite the fire deficit. This limits the desired ecological effects of fire and prevents reduction of the deficit. The analysis needs to be revised to emphasize the beneficial impacts of more fire.

Response: The "Agents of Change," "Fire Management," and "Ecological Integrity" sections of the final environmental impact statement analyze the effects of fuels and vegetation management treatments for achieving several objectives related to fuels management, ecological restoration, public health and safety, and protection of high valued resources and assets (for example, sensitive wildlife and plant habitat, watershed condition). This comprehensive analysis recognizes that there are beneficial and negative effects of wildland fire (for instance, wildfires, prescribed fire), rather than weighing only the benefits associated with fire regime restoration. This includes an evaluation of plan components that both limit undesirable fire effects and facilitate beneficial fire effects, as both are required to achieve fire regime restoration. All alternatives evaluated in the final environmental impact statement represent unique management scenarios that strive to restore natural fire regimes by maximizing the benefits and minimizing the impacts of wildland fire, with some alternatives resulting in a greater level of fire restoration (alternatives B and D) and others producing lower degrees of fire-related benefits (alternatives A and C, but lowest under A). Under all alternatives, wildfires will be managed using the full spectrum of responses (for instance, from full suppression to managing a fire to meet resource objectives) in order to achieve a balance of fire-related ecological benefits with negligible impacts to valued resources and assets. A more detailed discussion of fire management responses is covered in the "Fire Management" section of the final environmental impact statement.

7341

The draft environmental impact statement fails to address the real consequences of not re-establishing the appropriate fire frequencies for those fire regimes on the landscape.

Response: See response to comment 7340. In addition, the final environmental impact statement addresses the reestablishing of fire frequencies within the natural range of variation and desired

conditions by alternative (final environmental impact statement, Ecological Integrity, Terrestrial Ecosystems, "Fire Regimes and Fire as an Ecological Process" section).

7344

The characterization and interpretation of natural range of variation of mixed and high severity fire and related analysis are flawed. The interpretation of best available science information on the amount and large patch size is incorrect.

Response: We clarified the use of best available science information in the characterization of the natural range of variation of fire severity in Sierra Nevada forest ecosystems (including the characterization of mixed and high severity fire, such as the proportion and patch size of high severity fire) in the "Terrestrial Ecosystems" section of the final environmental impact statement (Terrestrial Ecosystems, Analysis Methods and Data Sources). We also clarified information sources relevant to natural range of variation in Sierra Nevada forest ecosystems that did not meet best available science information criteria under the 2012 Planning Rule in the same section noted above.

7345

Definitions of high severity fire need to be justified and explained further.

Response: High severity fire is defined as a subheading under "vegetation burn severity" in the glossary of the final environmental impact statement. This definition is "High severity: greater than 75 percent of the dominant overstory vegetation (trees) are killed. Also referred to as stand-replacement fire." This standard definition is based on Barrett et al. (2010; Interagency Fire Regime Condition Class Guidebook. Version 3.0, Available: (https://www.frames.gov/catalog/7793) cited in the final environmental impact statement. This definition is also consistently used in many best available science information sources cited in the "Ecological Integrity" and "Agents of Change" sections of the final environmental impact statement as well as the same definition used in wildlife conservation assessments and strategies (for example, Southern Sierra Fisher Conservation Assessment; Spencer et al. 2015). We further clarified this definition by revising this definition in the final environmental impact statement and Plan where it was not consistent with this accepted definition.

7346

Failed to disclose that increased fire extent and large fire size are likely to be correlated with increased amount of low-to-moderate severity as well as high severity fire effects and is beneficial (for instance, restoration of heterogeneous vegetation at landscape scale) and not all negative impacts. The ecological benefits of high severity fire are ignored.

Response: See response to comment 7319. The "Terrestrial Ecosystems" and "Wildlife, Fish, and Plants" sections of the final environmental impact statement and Terrestrial Vegetation Resilience and Terrestrial Vegetation Ecology Supplemental Reports summarize many of the positive and negative effects of fire in Sierra Nevada ecosystems based on the best available science information. This includes the recognition that very large wildfires outside of the natural range of variation with respect to fire severity patterns do not support desired conditions described in the forest plan and, consequently, are considered negative impacts. A similar conclusion is described in the final environmental impact statement (sections noted above) that a deficit of fire burning within natural range of variation in these forest landscapes also results in negative ecological effects. In comparison, low, moderate, and high severity fire within natural range of variation are

recognized as beneficial to Sierra Nevada ecosystems for promoting long-term ecological resilience, structural heterogeneity, suitable wildlife habitat, biodiversity, and other benefits (for example, carbon stability). These benefits are repeatedly covered in a number of subsections in the Terrestrial Ecosystems and Wildlife, Fish, and Plants sections (and in the associated supplemental reports).

7347

Climate change projections suggest that fire severity may, overall, decrease slightly to moderately over the 21st century in the forests of this region. This best available science information is not addressed in the analysis. The analysis needs to be revised.

Response: We added clarification in the final environmental impact statement (final environmental impact statement, “Agents of Change, Fire Trends, Cumulative Effects” section) that incorporates the results of Parks et al. (2016) and other best available science information related to fire severity trends in the Sierra Nevada.

Parks et al. (2016) does find an overall decline in fire severity in the larger western United States, but their spatial analysis (Fig. 4c) consistently shows either no change or an increase in fire severity in the Sierra Nevada and the planning area. Moreover, the authors state in their abstract that, “However, our model implicitly incorporates climate-induced changes in vegetation type, fuel load, and fire frequency. As such, our predictions are best interpreted as a potential reduction in fire severity, a potential that may not be realized due human-induced disequilibrium between plant communities and climate.” The authors state that only under an idealized scenario where fire suppression is minimal to non-existent does projected fire severity decline in other regions of the western United States (due to a reduction in plant productivity and burnable biomass); a largely unrealistic scenario with respect to current fire management trends. Their concluding statements in their Abstract underscores this point: “Resisting changes in vegetation composition and fuel load via activities such as aggressive fire suppression will amplify disequilibrium conditions and will likely result in increased fire severity in future decades because fuel loads will increase as the climate warms and fire danger becomes more extreme.”

7348

draft environmental impact statement' failure to explain the ecological importance of severe fire to the forests and wildlife of the southern Sierra-not only violates NEPA's core principles to inform public participation, it violates NFMA's best available scientific information standard, NFMA's standards as to ecological integrity and biodiversity, and NEPA's requirements as to scientific accuracy

Response: See response to comments 7319, 7346, and 7344.

7349

The draft environmental impact statement, p. 93, speaks to historical wildfires that were examined but uses 1992-2013, and the Westerling documents (discussed again below) that are relied on appear to use 1961-1991 as a baseline. Such baselines cannot actually provide for a "historical" analysis on which to base an assessment of altered fire regimes because both baselines (1) cover very short periods and (2) occurred during timeframes when fire suppression was very active, and thus cannot speak to historical fire extent; indeed, fire suppression is what has altered the fire regimes in the first place. Even 100 years is not the proper context.

Response: See response to comments 7353 and 7344.

7350

The draft environmental impact statement fail to explain to the public the ecological benefits of severe fire. The draft environmental impact statement offer a heavily biased presentation that seeks to characterize severe fire as a problem to be fixed, rather than presenting the ecological importance/necessity of severe fire.

The language used in the draft environmental impact statement reflects a value judgment on the part of the Forest Service that does not belong in a science-based management document, and which is contradicted by a long list of documents which shows that some of the same fire areas that the Forest Service subjectively refers to as "losses" are actually known to be supporting important biodiversity and essential habitat for Sierra wildlife (for example, research from the McNally, Angora, Storrie, Moonlight, King, Chips, and Rim fires [for example, Bond et al. 20091, 20132; Buchalski et al. 20133; Burnett et al. 20104, 20125; Campos and Burnett 20156, 20167; Fogg et al. 20158, 20169; Hanson and North 200810; Hanson 201411; Malison and Baxter 201012; Manley and Tarbill 201213; Seavey et al. 201214; Siegel et al. 201215, 201316, 2014a17, 2014b18, 201619; Tingley et al. 201420])

Response: See response to comment 7319 regarding the benefits of mixed and high severity fire. See response to comment 7346 regarding the characterizations of “severe fire” that result in negative versus positive effects that are supported by the best available science information.

7351

The analysis around fire history, fire trends, fire behavior, fire severity, fire effects was flawed or could be improved.

Response: We revised the final environmental impact statement to include additional best available science information in the analysis of fire regimes (final environmental impact statement, “Ecological Integrity, Terrestrial Ecosystems, Fire Regimes and Fire as an Ecological Process” section). Additional information is provided in the Terrestrial Vegetation Resilience and Terrestrial Vegetation Ecology Supplemental Reports of the final environmental impact statement. We also revised and included additional best available science information in our analysis of the effects of fire severity and effects in the final environmental impact statement (final environmental impact statement, “Ecological Integrity, Terrestrial Ecosystems, Special Habitats” section; “Agents of Change, Fire Trends” section).

7352

The statements about extreme fire behavior from fire-weather interactions is incomplete and flawed (for instance, emphasis on contribution of fuels and not weather, effects of treatment extent, and failure to disclose extreme events will continue to happen regardless).

Response: We further clarified in the final environmental impact statement (final environmental impact statement, “Fire Trends” section) that there are several sources of uncertainty in future fire projections and the extent and frequency of fire-atmospheric interactions that may result in extreme fire behavior and effects. Despite this uncertainty, the quantitative fire-climate analysis in the “Fire Trends” section of the final environmental impact statement and associated Fire-Climate Supplemental Report indicate that the frequency and extent of large wildfire size and severity can be substantially reduced under fuel treatment scenarios that result in reduced fuel loads within terrestrial landscapes of the Sierra Nevada. We included additional science-based citations in the “Fire Trends” section to support the statement that fire intensity can be reduced in landscapes where a significant proportion of the landscape is in a low or reduced fuels condition.

7353

Burned area analysis was flawed because we used 1961 to 1990 baseline, which is much smaller area burned than historic levels, and that this baseline is not representative of natural range of variation because we were suppressing fire effectively. The fire deficit is mischaracterized as a result. There should be decadal trends using historic data.

Response: Additional information was added in the "Fire Trends" section of the final environmental impact statement ("Analysis and Methods" subsection) to clarify that the "historic" baseline of 1961 to 1990 was intended to capture recent bioregional wildfire size and severity trends for this period that: (1) occurred during a period when active fire suppression and vegetation management was in effect (and not representative of the natural range of variation associated with the pre-settlement period prior to 1850); (2) was characterized by lower historic temperatures that preceded most current warming climate trends that began in the 1980's; and (3) reflected more accurate and reliable regional climate, hydrology, and fire data than earlier decades (primarily 1920-1960). For more details on these data and associated analysis, see the Data and Data Methodology of the "Changing fire, fuels and climate in the Sierra Nevada" report by Westerling et al. (2015). As noted in the "Fire Trends" section, the fire-climate analysis was not intended to compare future trends with natural range of variation but recent 20th century trends (for instance, "historic") with future projected trends in the mid to late 21st century.

7354

The draft environmental impact statement fails to adequately support assumptions that 12,000 acres or more area needs to be treated with at least 40 percent of the area within restored in order to change large fire behavior and effects. The analysis needs to be revised to better explain the underlying best available science information and rationale or remove this portion.

Response: The Fire Climate Supplemental Report of the final environmental impact statement provides additional details regarding the assumption that 40 percent of a forest landscape area requires a low or reduced fuels condition to reduce the extent of high intensity fire. The best available science information supporting this statement is provided in the "Assumptions" section of this report. The fire climate analysis results of this report (for instance, 30 percent and 60 percent treatment scenarios versus no treatment) also supports the trend of reduced fire extent and severity within landscapes containing higher proportions of low fuel conditions.

7355

The draft environmental impact statement is flawed because it fails to incorporate significant, meaningful discussion of the impacts of recent large wildfires such as the Rough Fire on all resources (for instance, air, water quality, wildlife habitat and other benefits from the forests).

Response: The "Terrestrial Ecosystems" and "Agents of Change" sections of the final environmental impact statement discuss the impacts of several large wildfires in the Sierra Nevada, including the 2015 Rough Fire, 2013 Rim Fire, 2014 King Fire, 2013 Aspen Fire, and 2014 French Fire. This includes a discussion of large wildfire effects of forest vegetation, wildlife habitat connectivity, carbon stability, wildfire trends, and special habitats (for example, old forest, complex early seral forest). The effects of large wildfires on wildlife species are discussed in the "Wildlife, Fish, and Plants" section of the final environmental impact statement. In addition, the Fire Return Interval Departure information presented in the Figure entitled "Map of fire return interval departure, Inyo National Forest" (final environmental impact statement, Terrestrial

Ecosystems, Terrestrial Ecosystem Processes and Functions, “Fire Regimes and Fire as and Ecological Process” section) has been updated to include recent wildfires that burned up to the year 2016.

7356

USFS fails to promote fire in the Plans (whether prescribed or managed), in the absence of logging

Response: All plan alternatives and objectives are based on pertinent science and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments including mechanical, prescribed and wildland fire managed for multiple objectives including natural and resource benefit (North et.al. 2009, Safford et.al. 2012, Stephens et.al. 2005, 2010, 2015, van Wagtendonk et.al. 2006, Westerling et. al. 2003, Wills et.al. 2006). These activities also benefit wildland urban interface communities, infrastructure and historic and cultural values at risk. Alternative B-modified estimates at least 20,000 acres/decade of both mechanical and prescribed fire and 64,000 acres/decade of restoration fire related activities. While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need to consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (final environmental impact statement chapter 3, “Fire Management Background” section). While ‘logging’ per se is not conducted on the Inyo, trees and biomass are removed to promote forest health and reduce hazardous vegetation and fuel buildup proximate to WUI communities or other values at risk and to meet plan desired conditions, goals and objectives. The generation of forest products is a secondary benefit of these projects, providing personal use and commercial fuelwood opportunities and may be a means for making implementation of projects more economically feasible to perform. 2017 Timber-Volume-Sold target for the Inyo is 6000 CCF through timber sale contracts and personal use permits.

7359

Combustion of cattle fecal pats has a wide range of implications for fire management. According to Scasta et al., 201422, cattle fecal pats readily ignite, are a common source of spot fires in semiarid grasslands, and release extreme amounts of energy when burning.

Response: The Inyo National Forest does not have semiarid grasslands; therefore, this science is not relevant to the planning area.

7360

The model needs to be re-run with the tree mortality data to make the fire management zones relevant. Not using the data is false and underrepresents the outputs and therefore zones are false.

Response: Tree mortality on the Inyo National Forest is not outside the natural range of variation. Therefore, fire modeling for the risk assessment was not re-run. Best available science information pertaining to tree mortality levels on the Inyo National Forest and its relation to natural range of variation and other parts of the southern Sierra Nevada has been added to the final environmental impact statement (“Agents of Change, Insects and Pathogens, Affected Environment” section).

7361

Wildland fire risk assessment poorly represents the multiple resource benefits of wildland fire as an ecological process by weighting the HVRA analysis heavily toward human infrastructure. This will result in risk aversion and promotion of aggressive suppression.

Response: Human habitation in the assessment refers to where people live, not just the structures. The human habitation HVRA was weighted heavily in comparison to the other values and resources because the loss of human life from wildland fire is unacceptable and irreplaceable. National Fire Policy states: "Firefighter and public safety is the first priority in every fire management activity" (Interagency Standards for Fire and Aviation Operations and Guiding Principles of the Federal Wildland Fire Management Policy). See SSRA report for further details explaining the risk assessment process.

7362

Some of the strategic management zones have nearly equal potential for damage/benefit leaving a high level of uncertainty which adds little information for fire managers in decision making, therefore they need rewritten so there is less uncertainty in management decision space.

Response: See figures showing risk location and source by alternative or comparison of the magnitude of net value change by strategic fire management zone (final environmental impact statement, chapter 3, Analytical Conclusions). These figures show how the risk assessment reduces uncertainty by analyzing the location and timing of fire occurrence and fire-related benefits and loss to highly valued resource and assets on a broad scale. The strategic fire management zones support decision makers by pre-assessing the risk and benefits of wildland fire (final plan, chapter 3, Strategic Fire Management Zones). The risk assessment is not designed for fire managers to use in decision-making for a specific incident. There are other decision support tools designed for assessing risk on a specific incident (for instance, relative risk assessment in WFDSS).

7363

The process for plan modification of the fire zones as conditions change is insufficient, unclear or too cumbersome (for instance, plan amendment) therefore it needs to be addressed better within the plan.

Response: See appendix B, Proposed and Possible Actions, Fire Section in Inyo LMP for clarification. The 2012 Planning Rule requires plan amendments when we change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas (36 CFR 219.13(a)).

7364

Water Capacity within the Community protection zones is missing therefore needs to be addressed within the plan and incorporated in the underlying analysis of where the zones are located

Response: Community water supplies are addressed in Community Wildfire Protection Plans (CWPP's). Impacts of fire suppression on water supply are addressed in the Southern Sierra Nevada Wildfire Risk Assessment: Methods and Results document in the Project Record. The final environmental impact statement was updated to include a discussion of community water supply where it occurs within the Inyo National Forest boundary.

7365

The Community Fire Protection Zones does not appear to have taken into account extreme fire behavior therefore the fire protection zones need to be larger (for instance, wider considering extreme fire such as King Fire) and/or prioritized for treatment

Response: The fire modeling used in the risk assessment to create all the zones used historical weather and wind data from local weather stations. Monthly distributions of wind speed and direction, season-long trends of mean and standard deviation of Energy Release Component (ERC) for NFDRS fuel model G, and values for 1-, 10-, and 100-h time lag dead fuel moisture content associated with the 80th, 90th and 97th percentile conditions were used in the assessment. The fires modeled with the 97th percentile conditions capture extreme fire behavior.

7366

The Community Wildfire Fire Protection Zone (CWPZ) as designed is too large and not consistent with best available science (Cohen). A more focused CWPZ would improve structure survivability.

Response: The Community Wildfire Fire Protection Zone is not the same as the home ignition zone on private property. We have been working for a number of years with local fire protection districts in evaluating defensible space and conducting fuels reduction projects on National Forest System lands in conjunction with work on adjacent private lands to make fuels reduction efforts more effective. Fuels reduction work on private lands is outside the scope of this planning effort.

The Community Wildfire Fire Protection Zone was created using the results from a quantitative spatial risk assessment, which used FSIM (fire simulation model) that simulated large fires using historical fire data. This takes into account not only where the fires start, but also captures where the fires burn (for instance, start in one area, burn into another) using historical weather patterns, current vegetation, and highly valued resource and assets. The zones were created to assist managers with a coarse overview of where the risk resides on the landscape. The size of the Community Wildfire Fire Protection Zone is not related to structure survivability improvements. The focus in the Community Wildfire Fire Protection Zone is to eventually lower the intensity of fire behavior near communities through fuels reduction treatments, such as mechanical and prescribed fire treatments so that are less reliant on aggressive wildfire protection. See the specialist report “How we made the zones” in the project record for further information.

7367

The community fire protection zone failed to include pre-identified safety zones and evacuation routes therefore they need to be addressed and identified within the community protection zones

Response: The land management plan and environmental impact statement are not the documents where this type of information is identified. This type of information is found in required supporting plans such as preparedness plans and wildfire operation plans (Fire Management Planning Guide).

Safety zones and escape routes are identified by an incident commander during fire briefings for each incident (Interagency Standards for Fire and Fire Aviation Operations, p. 168, https://www.nifc.gov/policies/pol_ref_redbook.html). This is also a “Standard Firefighting Order” found in the Interagency Response Pocket Guide (https://www.nwcg.gov/sites/default/files/publications/pms461.pdf). Order 4 is to identify escape routes and safety zones and make them known.

7368

Community fire protection within the zones are addressed as important but not stated implicitly as the highest priority therefore the priorities need to be listed implicitly with community fire protection as the priority. Modify the plan to implicitly state priority order for fire protection. Community fire protection should be the highest priority.

Response: See relative importance table in environmental impact statement, chapter 3, Wildland Fire Management, Analysis and Methods, table: Example highly valued resources and assets (HVRAs) and their relative importance values.

7369

Standards and guidelines for complex early seral forests (CESF) are also plainly needed in light of the draft plans' approach to fire management, in community protection zone it is not structured to be complex early seral forest-friendly as it seeks to eliminate snags, and therefore complex early seral forest standards and guidelines.

Response: Community buffers (found in the community wildfire protection zone (CWPZ)) are areas around communities that have high fire risk. Human health and safety are the primary values at risk within these areas. Snags and logs are absent or their densities are very low to minimize the likelihood of spotting or ember ignitions, maximize fireline production rates, and reduce firefighter safety hazards. The community buffers were created using potential fire behavior around structures and communities. See supplemental document Community Buffers Topic Fact Sheet for more information.

7370

Even though managed fire usage could be rare, the final environmental impact statement needs to disclose what resource(s) and specifically how (either benefit/adverse) they will be impacted from wildfire including managed wildfire.

Response: See “Ecological Sustainability and Diversity of Plant and Animal Communities” section in the final plan for species-specific impacts from wildland fire. See “Fire Management” section in final environmental impact statement for explanation of the decision-making process to manage a wildfire to meet resource objectives.

7371

The use of the term “manage” is erroneously used throughout the plan it is only appropriate under the General Wildfire Management zone therefore another term (such as “monitor” or “indirect management”) should be used in the Wildfire Maintenance Zone additionally specific areas treated previously would be helpful for example the LTBMU approach.

Response: See final environmental impact statement Fire Management: Background for updated definitions. Definitions and use of the terms manage and monitor have been clarified. There are multiple fire strategies (suppression, confine/contain, monitoring) that can be used in any zone depending on the conditions to respond to a wildfire whether that be suppression or managing a fire to meet resource objectives. Managing a wildfire to meet resource objectives is a type of fire response strategy.

7372

Need to disclose the environmental "Conditions" that will allow managing fires, this never revealed (chapters 1, 7), also it never addresses human, economic and social conditions that are relevant in the managing of wildfires.

Response: See final environmental impact statement "Fire Management" section and "Strategic Fire Management Zone" section in the plan. It has been re-written to clarify what the environmental conditions are in order to manage a fire to meet resource objectives. It also includes text referring to how we will address the human, economic, and social conditions.

7373

Need to disclose what "resource objectives" would be affected by managed wildfire. The term, "managed wildfire for resource objectives," is overly vague and non-descript of the specific resources and values that would benefit from managed wildfire.

Response: Plan components in the final plan address the resource objectives of utilizing managed wildfire, and a summary of the relevant plan components has been added to the final plan (Introduction to the Strategic Fire Management Zones, chapter 3, for example, TERR-FW-DC-08, TERR-OLD-DC-02, TERR-MONT-DC-02, TERR-ALPN-DC-02, TERR-PINY-DC-02). The resource analysis sections of the final environmental impact statement include an analysis of impacts of managed wildfire on each resource (final environmental impact statement, chapter 3, "Environmental Consequences" section for each resource).

7374

Need to disclose what "conditions" will enable or allow managed wildfire. The draft environmental impact statement fails to analyze or disclose what conditions will enable managed wildfires. The document focuses on "specific environmental conditions" (chapter 1, 7) but these are not specified for all relevant environmental factors. Doesn't address relevant human or social conditions necessary to manage wildfire, such as funds or resources available, pre-fire planning, community education and agreements with partners, etc. The final environmental impact statement should disclose all of these other relevant factors that impose "conditions" on the ability to manage wildfires, and explain how the proposed action will address these conditions

Response: In response to these public comments, the final environmental impact statement was updated to explain what the specific environmental conditions are, as well as the human and social conditions necessary to manage wildfire (chapter 3, "Fire Management, Background" section).

7375

The draft plans fail to lay out a fire use strategy of sufficient scale to mitigate change needed. The fire management program does not address needed changes, both cultural and ecological, to actually ramp up fire use to fire regime levels of fire frequency, intensity and size. While the restoration treatments for terrestrial ecosystems suggest increases in treatments, the fire management section of the draft environmental impact statement lacks specific objectives (none) to actually provide a commitment (staffing, budgets, logistic support for wildland fire modules) to build a fire program that would attain landscape level accomplishments at a scale to achieve resilience.

Response: There has been an institutional bias towards fire suppression and, in many ways, a similar bias in our society at large. The National Cohesive Strategy recognizes this bias and offers specific methods for moving past it (see final environmental impact statement, chapter 3, "Fire

Management, Background" section for a discussion of the National Cohesive Strategy Wildland Fire Management Strategy). The final plan adopts many of these methods and seeks to restore fire to a more natural role by using it to meet resource management objectives in specific areas. The Risk Assessment identified these areas by considering the effects of wildfire (both positive and negative) on natural resources and human-made assets. The use of fire will be allowed in all zones.

The final plan components are based on pertinent science (North et.al. 2009, Safford et.al. 2012, Stephens et.al. 2005, 2010, 2015, van Wagtendonk et.al. 2006, Westerling et. al. 2003, Wills et.al. 2006) and strive to increase the pace and scale of ecologically beneficial fire and fuel treatments including mechanical, prescribed and wildland fire managed (TERR-FW-OBJ-01 and 02). Proposed alternative B-modified estimates at least 20,000 acres/decade of prescribed fire, at least 20,000 acres/decade for mechanical fuel treatments, and 64,000 acres/decade of wildfires managed to meet resource objectives (final environmental impact statement, chapter 2, "Comparison of Alternatives by Restoration Activities" section). While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need to consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (final environmental impact statement, chapter 3, "Fire Management, Background" section).

The goal of ecological restoration is not to return the landscape to its historical fire regime (because such an outcome is not realistic with the extent of human influence), but instead to have forests that are sustainable and resilient to expected changes over time" (final environmental impact statement chapter 3, Revision Topic 1: Fire Management, Wildland Fire Management, "Acknowledge the Ecological Role of Fire" section).

7376

NEED TO EXPLAIN THAT MANAGED WILDFIRE IS ACTIVE, NOT PASSIVE, MANAGEMENT. The draft environmental impact statement imposes a false choice between "active management" defined largely as mechanical fuels reduction and "passive management" that implies managed wildfire is solely monitoring or so-called "let burn." This is not true.

Response: See final environmental impact statement, chapter 3 Fire Management, Background for clarification. Final environmental impact statement has been updated with new language.

7377

There should be more direct attack of wildfires and more emphasis on other treatments (outside of fire suppression when conditions are more conducive to prescribed fire or other treatments).

Response: Direct attack of wildfire fires is a suppression strategy that involves firefighters aggressively attacking and directly engaging the wildfire at the flaming front with ground or aerial resources. Utilizing direct attack is dictated by various factors including: fire behavior; resource availability; safety and values at risk.

Aggressive suppression leads to accumulation of fuels and worse fires in the future (Arno and Brown 1991), and this in turn leads to continued excessive suppression expenditures (Thompson et al. 2013) (final environmental impact statement, chapter 3, "Fire Management, Background" section). Addressing this condition and restoring the resilience of ecosystems to fire and other stressors is identified as one of the revision topics (final environmental impact statement, chapter

1, Purpose of and Need for Revising the forest plan, Revision Topic 2, Ecological Integrity,). The final plan also strives to increase the pace and scale of both mechanical fuel treatments and prescribed fire (final environmental impact statement, chapter 2, “Comparison of Alternatives by Restoration Activities” section).

7378

Firefighters should not take on excessive risk especially those of private property owners that have failed to modify their risk, therefore those areas of excessive risk or those of unmodified risk should be excluded from the risk assessment.

Response: Fire management practices in all alternatives would provide firefighter safety in all zones while providing asset protection (structures, powerlines, etc.) when present. The risk assessment assists in identifying the areas of high risk so fire managers and firefighters are aware of where the risk resides up front. Using the National Cohesive Wildland Fire Strategy, the USFS works with their partners to create fire-adapted communities, restore and maintain landscapes, and respond to wildfires safely and effectively. We collaborate with communities through Community Wildfire Protection Plans to work with communities to address their wildfire risk.

7379

Fire suppression/prevention personnel need to have every opportunity to exhaust all of the different techniques available to prevent a catastrophic outcome. The wisest approach is to reduce fire risk before fires even start. This can be achieved by reducing hazardous fuels, "fire-proofing" properties to the degree possible, and investing in "Firewise" programs that help reduce the risk of wildfires through landscape and building material modifications.

Response: Fire suppression/prevention personnel have many techniques available to them whether responding to wildfires or preventing them. These techniques change as technology and knowledge advance. Many are covered by national, regional and local policy and it is unnecessary and unwise to tie them to a long term document.

Please see:

(FIRE-FW-GOAL).

Restore ecosystems to a more fire resilient condition and lessen the threat of wildfire to communities.

For investing in programs that help reduce the risk of wildfires:

Coordinate with other jurisdictions such as communities, tribes, service providers, and federal, state, county and local entities regarding prevention, preparedness, planned activities and responses to wildland fires. Notify those agencies about upcoming and ongoing fire season and any prescribed fire activity.

Help communities become more fire adapted, improving their ability to withstand a fire without loss of life and property.

For reducing hazardous fuels:

Where feasible and suitable, use grazing, mechanical treatment, prescribed fire and/or wildfires managed to meet resource objectives to reduce vegetation build-up to lower the risk of unwanted wildfire.

For fire-proofing properties:

Provide defensible space as defined by the California Public Resource Code 4291-Defensible space around structures on administrative sites and structures authorized by permit.

Use naturally-ignited and prescribed wildland fires to meet multiple resource management objectives, where and when conditions permit and risk is within acceptable limits.

Coordinate with local fire districts in the development of major new structural facilities on National Forest System lands.

7380

Homeowner and community responsibilities are not clear or emphasized enough. Therefore it should be explicit that they should be responsible for clearing around their own homes and communities.

Response: Homeowner responsibilities are covered under State Law CPR Code 491 is the state clearance requirement. The Inyo National Forest does not have jurisdiction on private lands.

Community wildfire protection plans, the National Cohesive Strategy and State Law address this. In chapter 3 under the introduction to the Community Wildfire Protection Zone, it states that “the long-term focus is to create fire-adapted communities that are less reliant on aggressive wildfire protection” (FIRE-FW-DC).

Inyo National Forest personnel contribute to increased awareness and understanding about wildfire risk among community leaders, service providers, homeowners, permittees and Tribes who are invested in or adjacent to the Inyo. This includes an understanding about the need to adapt communities, properties and structures to wildfire, while also recognizing that wildland fire is a needed ecological process.

7381

It is not clear that it is the responsibility of the forest to provide buffers on administrative sites (defensible space CA Public Resource Code 4291) therefore it needs to be clarified in the plan.

Response: The plan contains the following direction addressing buffers on administrative sites:

FIRE-FW-GOAL

08 Provide defensible space as defined by the California Public Resource Code 4291.

Site-specific responsibilities for defensible space are determined within special use permits.

7382

The plan(s) need to include an emphasis on proactively creating defensible space around homes therefore the wording of this part of the plan needs to be made stronger.

Response: See response to comment 7366 for a discussion of treatments on private property around homes. The Forest Service does not have jurisdiction over treatments on private lands, but strives to facilitate these treatments on private lands adjacent to Forest Service lands. These types of treatments are more appropriately addressed at a site-specific scale, rather than the forest planning scale.

7383

Fire prevention needs to be more clear in plans.

Response: The final plan contains plan components that address fire prevention (FIRE-FW-GOAL 08, 09, and 10).

7384

The (Fire) District supports the "fire zone concept". But the concept needs to incorporate previous planning documents such as Community Wildfire Protection Plans and County/Town General Plans (going forward these documents are required by CalFire to include a section on exposure and mitigation of wildfire) in order to plan and implement in a harmonious fashion with the communities that share the landscape.

Response: The information in the community wildfire protection plan concerning communities at risk were used to inform the development of the community protection zones in the final plan. The final plan in the "Community Wildfire Protection Zone" section states that "the long term focus is to create fire-adapted communities that are less reliant on aggressive wildfire protection."' The final plan contains plan components that address this issue as well (FIRE-FW-DC 02, FIRE-FW-DC 05). There is a document on the planning website and in the Project Record that discusses fire zones and how they relate to the National Cohesive Wildland Fire Management Strategy and community wildfire protection plans (Fire Zones Frequently Asked Questions, June 2016).

7385

Plan needs to address the responsibility of the public who chooses to live in ecosystems that are prone to, and need, fire.

Response: The fire dependent nature of wildlands is covered by CWPP's, National Cohesive Strategy and State Law. The plan addresses the need for the public to be educated on wildfires and in chapter 3 under the introduction to the Community Wildfire Protection Zone it states that "the long term focus is to create fire-adapted communities that are less reliant on aggressive wildfire protection."

FIRE-FW-DC-02 states: "The Inyo National Forest contributes to increased awareness and understanding about wildfire risk among community leaders, service providers, homeowners, permittees, and Tribes who are invested in or adjacent to the Inyo National Forest. This includes an understanding about the need to adapt communities, properties, and structures to wildfire while also recognizing that wildland fire is a needed ecological process."

7386

The Forest Service should consider prohibiting with these Plans all camp fires and smoking in camping areas and impose severe financial penalty for smoking and fires in forested areas.

Response: Fire restrictions are put into place during fire season by the Forest Supervisor, depending on conditions such as fuel moisture and weather, and can include restrictions on smoking and campfires. These types of restrictions are more appropriately addressed at the site level and not at the planning level.

7387

The standards in the proposed plan in the fire section (Community Wildfire Protection Zone) for fuelbreaks (especially down logs) should be eliminated. These are too constraining and invite lawsuits when communities are surrounded by dead trees. Instead, put them in a separate monitoring guide.

Response: The plan component related to CWPZ snags and logs has been modified to address this issue (final plan, MA-CWPZ-GDL-01).

7388

The plan should be scaled back to treat the 200 feet immediately adjacent to private structures and important access routes.

Response: The plan component related to CWPZ snags and logs has been modified (made more specific to within 2.5 tree lengths of structures) to address this issue (final plan, MA-CWPZ-GDL-01). The CWPZ zones were developed to incorporate important access routes (final environmental impact statement, chapter 3, “Fire Management, Analysis and Methods” section).

7389

Lack of management of fuel conditions in wilderness and wildlands leads to an increase in fire risk to adjacent populated areas and increased probability of loss of characteristics and qualities that make them eligible for wilderness.

Response: The desired conditions for terrestrial ecosystems and vegetation in wilderness areas (TERR-FW-DC, 08, 12) in the Plan is for naturally occurring fire to serve as an ecological process in fire-adapted ecosystems where it does not pose an unacceptable risk to life and property. Fire occurs within an ecologically appropriate regime of frequency, extent, and severity, and enhances ecosystem heterogeneity and habitat and species diversity. The Plan strives to allow for natural ecological processes (lightning caused fire) to occur with little direct human influence and seeks to restore fire as an ecosystem process and natural disturbance agent (DA-WILD-DC). Restoration and fuels reduction treatments are designed to achieve desired conditions on suitable (non-wilderness) timber lands Timber production is prohibited in designated wilderness areas (Plan, appendix D).

7391

Plan direction for fire management in wilderness should be changed. There should be more prescribed burning in wilderness and associated use of mechanical tools (for instance, helicopters and chain saws).

Response: The desired conditions for terrestrial ecosystems and vegetation in wilderness areas (TERR-FW-DC, 08, 12) in the Plan is for naturally occurring fire to serve as an ecological process in fire-adapted ecosystems where it does not pose an unacceptable risk to life and

property. Fire occurs within an ecologically appropriate regime of frequency, extent, and severity, and enhances ecosystem heterogeneity and habitat and species diversity. The Plan strives to allow for natural ecological processes (lightning caused fire) to occur with little direct human influence and seeks to restore fire as an ecosystem process and natural disturbance agent (DA-WILD-DC). Restoration and fuels reduction treatments are designed to achieve desired conditions on suitable (non-wilderness) timber lands Timber production is prohibited in designated wilderness areas (Plan, appendix D).

7393

Plan component development (for instance, objectives) are flawed and the analysis on fire is incomplete because the human dimensions of the capacity and ability to implement prescribed fire and managed fire was not sufficiently addressed.

Response: See response to comment 7392.

7394

Plan specifically addresses social and economic barriers for ecological restoration and fire, but does not address the agency/internal ones and is therefore incomplete.

Response: Internal barriers for ecological restoration of fire are addressed in the final environmental impact statement: “There are multiple factors that make it difficult for forest managers to incorporate a more holistic approach into fire management. Some of these factors are risk aversion, sociopolitical pressures, and a resulting propensity to choose the status quo fire response of suppression” (chapter 3, “Fire Management Background” section).

The final plan provides new direction to increase ecological restoration and fire management to help overcome internal barriers. The Forest Service also continues to work on internal barriers by instituting new policies and strategies (for example, National Cohesive Wildland Fire Management Strategy).

7395

Plan direction related to fire is incomplete because it does not specifically address protection of recreation access and opportunities.

Response: The wildfire management zones give direction in the plan for wildfire management (final plan, chapter 3, Management Areas, Strategic Fire Management Zones) and those fire management zones provide protection for recreation access and opportunities. The risk assessment that is the basis of the wildfire management zones for the Inyo National Forest included recreation infrastructure and the major access routes to trailheads and recreation areas as highly valued resource assets resulting in protection areas where those assets exist. We included the recreation access routes because of the unique terrain in the eastern Sierra where many recreation areas are concentrated on one way in one way out roads in narrow canyons in order to provide evacuations routes and to account for the number of visitors and the density of recreation developments on these access routes (final environmental impact statement, chapter 3, Revision Topic 1: Fire Management, “Wildland Fire Management, Analysis and Methods” section). In response to this comment we examined the access routes that were included in the risk assessment and added two routes that were previously missed in the draft environmental impact statement.

7396

Existing roads and motorized trails should remain open to provide adequate access for fire suppression.

Response: The decision about which roads to include on the National Forest Transportation System was made in the Inyo National Forest's 2009 Travel Management Record of Decision (R5-MB-198a). Access for fire suppression was considered in that decision (Inyo National Forest Motorized Travel Management final environmental impact statement Table 2-8). Any future changes to that system would be made in a project-level decision, not in this forest plan revision.

7397

The draft environmental impact statement fails to consider and analyze human dimensions that contribute to the low levels of prescribed fire accomplished (budgets, politics, risk, staffing, etc.). The plan needs to be revised to include direction that addresses human dimensions to overcome barriers to achieving the objectives. Increasing fire related objectives without addressing human dimensions makes it highly uncertain that this plan direction can be accomplished. Consider incorporating dedicated wildland fire modules or shared resources with other agencies.

Response: In response to these public comments, the final environmental impact statement was updated to explain what the specific environmental conditions are, as well as the human and social conditions necessary to accomplish wildland fire management, which includes prescribed fire and wildfire (chapter 3, "Fire Management, Background" section).

7398

It's unclear how the U.S. Forest Service intends to increase prescribed burning levels when all forests within USFS Region 5 currently have large acres of prescribed burning backlog.

Response: See response to comment 7172.

7399

The fire regime-fire frequency levels for the early adopter landscape needs to be identified to compare what is being recommended to what is needed for ecosystem stability and resilience. Prescribed fire targets for the forests match what should be annual. There is no adequate description of how these numbers (above) were attained. Additionally, there is no discussion of the budgetary, staffing, logistical and general program reorientation needed to achieve these outcomes, let alone an expanded program that might have a chance of reaching fire resilience.

Response: Fire regimes and fire frequencies were used in the analysis in many places in the final environmental impact statement (final environmental impact statement, chapter 3, Agents of Change: Climate, Fire, Insects, and Pathogens; Revision Topic 1: Fire Management; and Revision Topic 2: Ecological Integrity). The final environmental impact statement acknowledges that the proposed alternatives will not completely reverse the altered fire regimes on the landscape because "many fire regimes in the southern Sierra Nevada are currently highly altered and will stay altered because many sociopolitical concerns affect how wildfires are managed and how fuels are treated." "The goal of ecological restoration is not to return the landscape to its historical fire regime (because such an outcome is not realistic with the extent of human influence), but instead to have forests that are sustainable and resilient to expected changes over time" (final

environmental impact statement chapter 3, Revision Topic 1: Fire Management, Wildland Fire Management, “Acknowledge the Ecological Role of Fire” section).

Alternative B-modified has the objective to accomplish at least 20,000 acres/decade of both mechanical and prescribed fire and 64,000 acres/decade of restoration fire related activities. While these estimates fall short of the historic natural extent of wildland fire, they strike a balance with the need consider opposing constraints including public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability and risk aversion (final environmental impact statement chapter 3, Revision Topic 1: Fire Management, “Wildland Fire Management, Background” section).

7400

The alternative C direction to leave "most burned areas to recover naturally" and then where possible use prescribed fire 10 years following the burn on half of the burned acres is flawed. What we've learned on the Rim Fire is that what was low and moderate severity burn is now dead due to the insect and disease epidemic (100 green tons/acre dead). Further, we find on the Rim Fire that just 3 years after the fire, the brush component has re-sprouted and is 5-plus feet tall. A strategy to re-burn half of wildfire burned acres 10 years after the wildfire is just going to be another wildfire (no forest burn boss would dare light a prescribed fire in these conditions).

Response: Other alternatives in the final environmental impact statement besides alternative C, including the preferred alternative, direct reforestation post-fire as needed according to site objectives and timber suitability and direct greater amount of active management for resilience. The analysis of environmental consequences shows that alternative C would have fewer benefits for the structure of Sierra Nevada Montane Forests (final environmental impact statement, chapter 3, Revision Topic 2: Ecological Integrity, Environmental Consequences to Vegetation Composition, Structure, and Resilience, “Consequences Specific to Alternative C” section).

Alternative B-modified is the preferred alternative because it balances the need for a greater focus on landscapes and processes with protection for wildlife with the need for more active management to achieve long term sustainability. The final plan strives to streamline and simplify standards and guidelines to allow for increasing the pace and scale of restoration projects designed to reduce the risks associated with large, high-intensity wildfires, drought, insect outbreaks, and climate change (final environmental impact statement chapter 2, alternative B-modified).

The record of decision provides the rationale on why alternative B-modified is the preferred alternative (Decision Rationale section).

The Rim Fire occurred on the west side of the Sierra Nevada where forest structure and response to wildfire are different than the eastside ecosystems on the Inyo National Forest. The final environmental impact statement discusses the amount and nature of post-fire complex early serial conditions on the Inyo National Forest (chapter 3, Revision Topic 2: Ecological Integrity, “Terrestrial Ecosystems, Fire as an Ecological Process, Complex Early Serial” section).

7403

Biomass utilization should be emphasized more in the plans to address smoke management and mitigation.

Response: See response to comment 7171.

7404

It is imperative for the health of the local communities that fire and smoke exposure be minimized.

Response: See response to comment 1001 concerning smoke and associated health concerns.

7405

Effects of climate change on fire management incomplete or not addressed.

Response: There is a section in the final environmental impact statement that addresses fire and climate change (chapter 3, Agents of Change, Combined Effects of Climate, Fire, Insects and Pathogens). Climate change is also addressed in the "Wildland Fire Management" section introduction (chapter 3, Wildland Fire Management).

7406

Need to analyze and disclose the direct, indirect, and cumulative adverse environmental effects of standard fire suppression methods (for instance, risk to firefighters, costs to taxpayers, and adverse ecological impacts).

Response: We do not analyze the effects of suppressing fires at the plan level. Fire suppression is typically considered an emergency action and exempt from NEPA regulations (40 CFR 1506.11) because immediate actions are needed to control the situation and mitigate impacts to life, property, or important natural or cultural resources. However, how the Inyo National Forest personnel approach fire management is addressed as part of this planning process and analyzed across alternatives in the final environmental impact statement (chapter 3, Wildland Fire Management, "Environmental Consequences of Fire Management" section). This analysis includes a discussion of how fire suppression may be impacted by the different fire management approaches and what that could mean in terms of costs and safety. An analysis of the ecological impacts of the different fire management approaches across alternatives can be found in the "Ecological Integrity" section of the final environmental impact statement.

7408

The final environmental impact statement should model predicted wilderness wildfires and disclose this data, taking advantage of the opportunity to educate the public about the benefits of managed wildfire for fuels reduction and ecosystem restoration.

Response: The final plan and final environmental impact statement have been used as an opportunity to educate the public about ecological restoration and wildfire managed for resource objectives everywhere across the landscape, not just in wilderness. Additionally, during wildfires, fire managers have a selection of fire models that predict fire growth and/or probability of where the fire will burn. The results are available to the public and can be used as an education tool during and after the fire.

7409

Because plantations are so expensive to establish and are inherently prone to high severity fire, risk adverse-managers will be reluctant to allow plantations to burn under any conditions, interfering with the use of managed wildfire for resource benefit. The draft environmental impact statement should address the effects of the amount and

spatial arrangement of existing plantations and future plantations on the ability to use managed wildfire.

Response: There are so few acres of plantations on the Inyo National Forest (final environmental impact statement, chapter 3, "Terrestrial Vegetation, Affected Environment" section) that the arrangement of plantations does not influence the use of managed wildfire.

7410

The draft environmental impact statement does not adequately explain why it is assumed that alternative C will have fewer managed wildfires than alternative A. The logic or rationale was not disclosed.

Response: Alternative C would have a greater amount of managed wildfire than alternative A (final environmental impact statement, chapter 2, "Comparison of Alternatives" section). We updated the final environmental impact statement "Agents of Change" section to be consistent with this.

7411

The draft environmental impact statement states (p. 239) that alternative C would have adverse effects on old forests due to high severity fires. There is an assumption that such burns would occur, and this is the apparent basis for effects on old forest associated wildlife species, which provides the rationale for not selecting alternative C. But this is contradicted by Table 62 (draft environmental impact statement, p. 250), which shows that old forest condition and extent are essentially the same in alternatives B and C. Unsupported conclusory statements do not provide the information required by NEPA for informed decision-making.

Response: Corrections were made to the "Old Forest Condition and Extent" row of the Table entitled "Summary of conditions for characteristics of integrated sustainability by alternative" in the final environmental impact statement (Terrestrial Ecosystem, "Integrated Terrestrial Ecosystem Sustainability" section). This correction clarified that: (1) old forest condition in alternative C was lower than alternatives B and B-modified, and (2) old forest vulnerability was higher in alternative C than alternatives B and B-modified. These corrections were also added to the associated integrated terrestrial ecosystem sustainability of the final environmental impact statement.

7413

The final environmental impact statement needs to provide a reasonable estimate of predicted prescribed burn acres that will be accomplished, especially in mechanically treated sites. The final environmental impact statement should disclose the amount of acres of currently backlogged prescribed burning (for instance, mechanically-treated sites that had planned follow-up fire treatments that have yet to be implemented).The final environmental impact statement needs to analyze and disclose the impacts on restoration goals if prescribed burning is not accomplished, especially in the areas of mechanical treatments that will generate large amount of hazardous surface fuels after commercial thinning.

Response: See response to comment 7172. It has not been the practice on the Inyo to leave surface fuels after thinning without further treatment (final environmental impact statement Wildland Fire Management, Affected Environment, Fuel Reduction Treatments) and the final plan includes a plan component that prevents vegetation buildup to lower the risk of unwanted wildfire (final plan, Forest-wide Fire potential management approach).

7414

Although alternative B is best all around, the fire management direction and objectives in alternative D are better because they are more aggressive, returns fire to its place in the ecosystem, and offers improved safety for the communities surrounded by National Forest lands. Alternative D offers a greater range of options and strategic areas identified for the control and containment of wildland fires across the forest.

Response: Alternative B-modified is the preferred alternative because it balances the need to consider opposing constraints including budget, public health, smoke and air quality, prescription windows, natural and cultural values, firefighting resource and funding availability, and risk aversion (see the record of decision).

7415

Alternative C should incorporate the four risk-based fire management zones from alternative B as outlined in the draft plan. In general, fire management strategy should be focused on natural fires as an important ecological process that will, over time, improve the resilience of the forest.

Response: Alternative C was developed with issues that were identified from public involvement. See environmental impact statement chapter 2, Alternative C Revision Topic 1: Fire Management for background. The zones in alternative C were created based on a combination of existing management areas and modeled outputs from the risk assessment. The zones in alternative C were created with more area emphasizing restoration of wildfire for resource objectives (see chapter 3: Consequences specific to alternative C for more specific information on why 3 zones were chosen for this alternative). Alternatives B, D, and B- modified incorporate the four risk-based fire management zones and have a greater amount of acreages proposed for managing wildfires to meet resource objectives (natural fires). All alternatives have proposed restoration levels of different treatment types in order to provide a range of alternatives to compare effects.

7416

Plan components are currently inadequate and we suggest the incorporation of the following:

Additional Desired Conditions:

The network of agencies and stakeholders creates a stable socio-cultural environment that fosters the collaborative management of fire for resource benefits.

Social investment and financial resources support the decrease in fire exclusion and an increase in the use of managed fire necessary to achieve desired conditions for ecological restoration and public health and safety.

Response: The final plan was modified to include plan components that are consistent with these suggestions (final plan, chapter 2, “Forestwide Fire” section).

7417

Plan components are currently inadequate and we suggest the incorporation of the following:

Additional Goals:

Establish at least two wildland fire modules on the national forest.

Work with adjacent land management agencies to identify methods to reduce costs and increase effectiveness in restoring fire to the landscape.

Prior to and during the fire season assess conditional thresholds under which desired conditions can be met for the strategic fire management zones. Work with tribes and adjacent landowners to identify areas and resources of value considered in the assessments.

Develop and implement a collaborative fire training program, for example, like TREX, to expand prescribed fire opportunities and create a skilled public and private work force to support the use of fire for resource benefits.

Wildland fire modules serve as a dedicated team of specialists and practitioners to lead to the application of prescribed and managed fire and are supported by fire suppression staff as needed.

Planned prescribed and managed fire projects over large landscapes to increase efficiency and readiness to utilize or apply ignitions when environmental conditions are appropriate.

Response: The Plan cannot dictate staffing levels, so it cannot include a plan component related to wildland fire modules. The final plan includes plan components that are consistent with the suggestions related to working with adjacent land management agencies and assessing conditional thresholds, and landscape level fire management (FIRE-FW-GOAL 02, 04, 06, 09, and 10 and chapter 2, Fire Potential Management Approaches). The Inyo currently does cross training with non-federal partners and the final plan includes plan components that encourage coordination with other jurisdictions such as communities (FIRE-FW-GOAL-06).

7418

Plan components are currently inadequate and we suggest the incorporation of the following:

Additional or Revised Objectives:

Wildland fire modules--two in each national forest--will be established on the national forests during the first two-years of plan implementation to support prescribed fire and managed fire pace and scale needed to reach desired conditions.

Restore low and moderate severity fire mosaics of beneficial fire using prescribed fire on (Inyo National Forest - 10-14,000 ac/yr) acres within 10 to 15 years following plan approval.

Create a network of reduced fuels along ridgelines, roads, or other natural or man-made features to support the use of large prescribed fires and in managing wildfire for ecological benefits in four large landscapes (greater than 30,000 acres) within 10 to 15 years following plan approval.

Response: The Plan cannot dictate staffing levels, so it cannot include a plan component related to wildland fire modules.

The current objective for prescribed fire is at least 20,000 acres. It's unclear why the commenter suggests a smaller number of acres.

There are plan component that is consistent with the suggestion concerning reduced fuels along ridgelines, roads and other features (MA-CWPZ-GDL-02, MA-GWPZ-GDL-02, MA-WRZ-STD-01, MA-WMZ-STD-02, TERR-FW-OBJ-01 and 02).

7419

Plan components are currently inadequate and we suggest the incorporation of the following:

Additional Guidelines:

Prior to prescribed fire use in stands of older trees (especially, ponderosa pine, sugar pine) with significant duff build up, utilize tree protection mitigation measures described in RMRS-GTR-238, where practical, to limit mortality. Strategies and Partnership Opportunities (other content as allowed by 36 CFR 219.7)

Participate in the Fire MOU Partnership to build a broad base of support for the increased use of wildfire and prescribed fire for resource benefits through intensified outreach and education efforts.

Work with the Fire MOU Partnership to expand collaborative efforts to support multi-jurisdictional burn projects via cost-share agreements and strategic fire planning.

Establish a collaborative group with air regulators, air quality scientists, concerned stakeholders and public officials to facilitate information exchange, collaborative outreach and education efforts, and joint media response efforts focused on presenting the "net gain" in public benefits from expanded fire use.

Coordinate with Fire MOU Partners to develop consistent, positive messages regarding fire ecosystem benefits, public health and safety, fire safe living, smoke management, collaborative planning and the "net public benefits" of a scaled up fire program.

Actively engage fire scientists in public and media outreach, fire science information transfer, and in discussions with policy makers regarding increases in fire use.

Response: There is a plan component that addresses the concern about prescribed fire effects on old trees (TERR-OLD-GDL-02).

Signing a memorandum of understanding is a separate process from planning, but there are plan components that encourage coordination, outreach and education efforts (see all goals (1-10) in the "Fire" section of the final plan).

7420

Cumulative Impacts of the system of fuel breaks on ridges, roads, and trails throughout the Sequoia, Sierra, and Inyo National Forests must be considered in a new draft environmental impact statement or a supplemental draft environmental impact statement, because no specific project environmental impact statement that implements the plan will analyze the cumulative impacts of implementing all projects in three national forests. These plans must analyze the cumulative impacts to the environment from the system of restoration treatment fuelbreaks along ridgelines,

roads, and trails that would be enabled and implemented throughout these Sierra Nevada National Forests by these plans.

Response: Inyo National Forest has a new final environmental impact statement not including the Sequoia and Sierra National Forests. The forest plan is not a project level document; it does not lay out or suggest a system of fuelbreaks across the national forest. Impacts of fuel treatments would be analyzed at the project level.

7421

The draft environmental impact statement does not address how the U.S. Forest Service has authority and ability to treat fuels on private land

Response: The U.S. Forest Service does not have authority to treat fuels on private lands. Private entities, for instance, Fire Safe Councils, can, however, apply for Federal grant monies to conduct hazard fuel reduction work on private land adjacent to federal land where fuel reduction work has occurred or is anticipated. These projects must be NEPA/CEQA compliant.

7422

Strategic Fire Management Zones. This section has numerous standards, guidelines, and goals for fire management zones, none of which recognize livestock grazing as a tool for fuel reduction. For example, Goal MA-GWPZ-GOAL 02, page 51 does not recognize the value of grazing in managing fuels. Recommendation: Amend Goal MA-GWPZ-GOAL 02 to read: "Reduce the threat of wildfire spreading to communities through fuel reduction treatments, livestock grazing, prescribed fire and wildfires managed to meet resource objectives, while also reducing risk to natural resources."

Response: In response to this comment livestock grazing was added to MA-GWPZ-GOAL 02 in the final plan:

Reduce the threat of wildfire spreading to communities through fuel reduction treatments, prescribed fire, wildfires managed to meet resource objectives, and when appropriate and feasible, livestock grazing, while also reducing risk to natural resources.

7423

Wildfire restoration zone, standard 01 and; wildfire maintenance zone, standard 02; these standards mandate the use of a variety of barriers and features "when managing wildfires," including trails. Since this direction is vague, we are concerned that this will result in trails infrastructure being used for fire lines built with motorized equipment, which would destroy the existing trail infrastructure, leading to needs for extensive reconstruction. This matter is dealt with in the Pacific Crest Trail management area through a specific standard. Many of these system trails provide important access to the Pacific Crest Trail and are part of the Pacific Crest Trail experience. Discussion is needed by fire and trails agency staff and non-governmental partners that would result in better, more detailed language that facilitates fire control without resulting in undue damage to the forest trail system. [Also added to general recreation].

Response: See response to comment 8394.

7424

I ask that the U.S. Forest Service, National Park Service, Bureau of Land Management, state and local land, fire, and air quality agencies work together to coordinate wildland

and fire management projects to protect human health, welfare, and the productive capacity of all Americans.

Response: The plan includes language that addresses the need to work cooperatively with other Federal agencies and stand and local land, fire, and air quality agencies on wildland fire and fire management projects. This direction can be found in the following components: AIR-FW-GOAL 02 and 05; FIRE-FW-DC 02; FIRE-FW-GOAL 02, 06, 09 and 10.

Wildlife and Botany

9000

The plans lack sufficient fine filter plan direction to provide for the ecological requirements and viability of at-risk species, therefore the plans should be revised to be more specific and detailed to more adequately provide science-based direction for protection of at-risk species, including setting clear habitat restoration goals, survey priorities and habitat protection measures. All the species of concern should have a thoroughly developed, science-driven plan for their protection.

Response: For forest planning, the term “at-risk species” includes both species federally protected under the Endangered Species Act and species of conservation concern.

For federally listed species, approved recovery plans, conservation assessments and conservation strategies were reviewed to determine where plan direction was needed to contribute to the recovery of species.

For species of conservation concern, the status of key ecological conditions and key risk factors within the plan area was evaluated. Then, it was determined which ecosystem plan components and species-specific plan components, where they exist, would provide for the ecological conditions and address the key risk factors so that the forest plan provides for their persistence in the plan area.

This analysis is summarized in the final environmental impact statement, chapter 3, in the sections on at-risk terrestrial, at-risk aquatic, and at-risk plant species for each species of conservation concern.

The final plan provides species-specific plan components for bi-state sage-grouse (SPEC-SG), great gray owl (SPEC-GGO), bighorn sheep (SPEC-SHP), Sierra marten (SPEC-SM), California spotted owl (SPEC-CSO), Lahontan cutthroat trout (SPEC-LCT), Paiute cutthroat trout (SPEC-PCTR), golden trout (SPEC-GT), Yosemite toad and yellow-legged frogs (SPEC-AMPH), and special habitats for plant and animal species (TERR-SH).

See also response to 9003.

9001

Direction for snags is inadequate to provide for the needs of at-risk species. Snags can be standing, down, large, small, of various species, and in various stages of decomposition. They should not be uniformly spaced around the forest like candles on a cake nor should they be all in one corner of a survey plot and then averaged in with the other plots, so it appears there are snags throughout the surveyed area.

Response: The final plan provides direction for snags in several areas of the “Terrestrial Ecosystem” section in chapter 2, with a particular emphasis on retaining large snags and downed

logs to provide habitat and roost sites for wildlife species such as small mammals and cavity-nesting birds. An example of distribution language is "at the mid- to fine scale, snags greater than 20 inches in diameter are at densities between 2 to 20 snags per 10 acres, and are well distributed, but highly irregular in spacing providing for future downed logs."

Here is a fairly comprehensive list of snag direction in the final plan: Forestwide guidelines TERR-FW-GDL-01 and 02; table 3 – Snags and large logs at landscape scale in low to moderate severity burn patches; old forest desired conditions TERR-OLD-DC-03, 05, and 06, and guidelines TERR-OLD-GDL-02; complex early seral desired conditions TERR-CES-DC-01, 02, 03, and goal TERR-CES-GOAL-01-d; black oak and canyon live oak desired conditions TERR-OAK-DC-01; dry mixed conifer desired condition TERR-DMC-DC-06; Jeffrey pine desired conditions TERR-JEFF-DC-04; red fir desired conditions TERR-RFIR-DC-04, 05, and 07; and lodgepole pine desired conditions TERR-LDGP-DC-05 and 10.

9002

Special habitat designation should be made for endangered and threatened plant and animal species.

Response: The forest plan for the Inyo National Forest is developed to contribute towards the recovery of federally listed species. All plan components that address at-risk species are relevant for federally listed species (final plan, chapter 2, "Animal and Plant Species" section). The U.S. Fish and Wildlife Service has responsibility for identifying Critical Habitat for the recovery of federally listed endangered and threatened species. Critical Habitats are designated for several species and were considered in evaluating the consequences of the alternatives as shown in the final environmental impact statement (final environmental impact statement, chapter 3, "At-Risk Species" section). As required by agency policy, as site-specific projects are later proposed, the consequences on federally listed species and critical habitats are evaluated and the U.S. Fish and Wildlife Service is consulted as needed. Critical habitats do not need to be delineated as management areas in the plan to consider them in the final environmental impact statement or for them to be considered as projects are proposed.

9003

Lack of species-targeted plan components is contrary to the planning rule's requirement and National Forest Management Act that forest plans provide for the ecological conditions necessary to maintain a viable population of each species.

Response: The 2012 Planning Rule, in compliance with National Forest Management Act, requires that forest plans provide for the diversity of plant and animal species within the plan area. The 2012 Planning Rule does not require species specific plan components for each at-risk species if ecosystem plan components are adequate to provide the ecological conditions that would provide for the persistence of the species. See response to comment 9000 for a list of species with additional species-specific plan components. The final environmental impact statement provides an enhanced discussion of the combination of plan components that provide for the ecological conditions each species needs to persist over time (final environmental impact statement, chapter 3, "Animal, Fish and Plants" sections).

9004

Vulnerable and at-risk species need measurable protective standards to safeguard their populations and habitats by reducing the threats, including salvage logging and the harvest of large trees that are imperiling their populations.

Response: Forestwide direction for animal and plant species in the forest plan such as SPEC-FW-Desired Conditionss 01 to 03 provide for at-risk species in general. Additional direction in the Terrestrial Ecosystems and Vegetation section addresses retention of snags and large live trees and management of complex early seral forests. See especially TERR-FW-GDL-01 and -02; TERR-CES-DC-02, TERR-CES-GDL-02 and -05

At the site-specific project level, project design for salvage projects and projects removing trees would consider the ecological conditions that provide for the persistence of at-risk species, including appropriate levels of snags and downed logs to move towards desired conditions.

9005

We urge the Forest Service to develop strong conservation standards to more fully protect sage-grouse, California golden trout, northern goshawks, willow flycatchers, pine marten, Yosemite toads, desert and Sierra Nevada bighorn sheep and native plants. Please also protect old growth and mature forests that provide important habitat for species like the pine marten and northern goshawk.

Response: See response 9000 for the process used to develop plan direction for species.

Species specific plan direction was developed for the bi-state sage-grouse (SPEC-SG), California golden trout (SPEC-GT), Sierra (pine) marten (SPEC-SM), Yosemite toads and mountain yellow-frogs (SPEC-AMPH), and both species of bighorn sheep (SPEC-SHP)(final plan, chapter 2, “Animal And Plant Species” section).

Instead of developing species-specific direction for each of the many plant species of conservation concern, the forest plan includes direction for special habitats (TERR-SH) that is designed to provide for many of the ecological conditions needed by most plant species of conservation concern (final plan, chapter 2, “Terrestrial Ecosystems and Vegetation” section).

Direction for old forests (TERR-OLD) was designed to maintain and restore the large and old tree components of forested vegetation towards the natural range of variation in the montane zone of the Sierra Nevada and portions of the Glass Mountains. Direction for each forested ecosystem type (TERR-DMC, TERR-JEFF, TERR-RFIR, and TERR-LDGP) also includes guidance for managing large trees. In addition a species-specific guideline was developed for Sierra marten (SPEC-SM-GDL-01) to recognize that overtopping and multi-canopied tree stands are important to provide marten habitat.

See response to comment 9060 that explains why the northern goshawk was determined to not be a species of conservation concern on the Inyo National Forest.

See response to comment 6114 that explains how persistence of willow flycatcher is adequately provided by plan direction for wildlife and management of riparian vegetation in the riparian conservation areas.

9006

The Plan needs stronger conservation standards to protect amphibians threatened by disease and fish planting, Bighorn Sheep threatened by inappropriate grazing allotments, birds of all kinds that need to adapt migration timing to changing conditions, etc. All the species that live on the Inyo deserve your concern and protection in the Plan.

Response: The forest plan is designed to provide guidance so that species can persist through time on the Inyo National Forest. In developing the final set of plan components, the ecological conditions needed to contribute to the recovery of federally-listed species and species of conservation concern were considered along with the relevant threats that these species face that are affected by management of the National Forest (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants" section).

Threats from spread of diseases and from non-native fish planting to federally listed amphibians are recognized by the U.S. Fish and Wildlife Service when they listed the two yellow-legged frog species and the Yosemite toad under the Endangered Species Act. It is also discussed in the conservation assessments for mountain yellow-legged frogs and Yosemite toads and is well documented in the scientific literature. Because these species are federally listed, best management practices such as decontamination procedures to minimize the spread of disease are included in project design when necessary. Projects that may affect these species are reviewed by the U.S. Fish and Wildlife Service in compliance with Section 7 of the Endangered Species Act to ensure they include appropriate mitigations of threats.

The California Department of Fish and Wildlife has evaluated their fish stocking program and has ceased fish stocking where it conflicts with recovery of federally listed species. Inyo National Forest and California Department of Fish and Wildlife personnel have annual coordination meetings and work collaboratively throughout the year to manage species and their habitat including restoration of amphibian and fish habitats.

See responses to comments 9086 and 9079 regarding the desired condition to address disease transmission from domestic sheep and goat grazing and bighorn sheep.

See response to comment 9080 regarding the change to SPEC-SHP-STD-01 using a risk assessment to manage the risk of disease spread between domestic livestock and bighorn sheep.

9007

There is no biologically legitimate reason to log trees other than ones planted as a monocrop and all the same age in a stand.

Response: A biologically or ecologically legitimate reason to remove trees by logging could exist, such as removing dead or diseased trees to reduce spread of disease or reduce risk of uncontrollable high severity wildfire outside of the historic range of natural variability that threatens to destroy habitat for at-risk species. See also responses to 7104 and 7130.

9009

The plans will not be able to meet goals to protect, spotted owl, pacific fisher and marten due to the restrictions limiting mechanical treatments over so much of the available productive forest lands.

Response: Suitable habitat for the California spotted owl and Sierra marten is limited to the Sierra Nevada montane zone on Inyo National Forest. The Pacific fisher does not occur on the Inyo National Forest.

As discussed in the "At-risk Terrestrial Species" section of the final environmental impact statement, the majority of the suitable habitat for these species occurs in designated wilderness where mechanical treatments are prohibited or in inventoried roadless areas where road access for mechanical treatment activities is limited (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants" section). The use of mechanical treatments is generally limited by other requirements rather than due to protections specifically designed for these species. Given the limited opportunity for mechanical treatments, the primary means to manage vegetation in these areas to provide for sustainable habitat is through restoring fire to the landscape.

9010

The focus on retaining the best possible nesting and denning habitat for old forest species ignores the reality that ever increasing stand density over large areas pre-dispose these areas to catastrophic fire and insect mortality leading to loss of this habitat.

Response: The final forest plan contains desired conditions for vegetation designed to move towards stand conditions that are more resilient to the stressors driven by current and expected future climate. In particular, see the forestwide terrestrial ecosystem and vegetation desired conditions TERR-FW-DC-01, -02, -04 and -09 and the Sierra Nevada montane zone - old forest habitat desired conditions TERR-OLD-DC-01, -02, and -04 (final plan, chapter 2). The expectation is that if forest vegetation is more resilient to these stressors, they will ultimately be more sustainable and able to provide for the many multiple uses of the forests, including sustainable wildlife habitat. For the Inyo National Forest, this entails restoring fire as a process and, where needed and where practical, active management of forest conditions to reflect the natural range of variation that has shaped the forest over time. The plan direction for old forests recognizes that old forest conditions are relative to the particular vegetation type and on-the-ground conditions where projects are proposed so that denser forests are managed where they are ecologically appropriate and thus more sustainable over time.

9011

The Inyo National Forest plan authorizes livestock grazing to continue in pygmy rabbit habitat and plans for vegetation treatments in pygmy rabbit habitat without providing any impact analysis or specific mitigation for this imperiled species; therefore, analyze the impacts to the species of these activities.

Response: The pygmy rabbit was evaluated to determine if it met the criteria to be considered a species of conservation concern. The species is ranked by NatureServe as G4 or apparently secure and S3 or Vulnerable in both California and Nevada. It occurs in sagebrush habitats and the primary threat, which was determined to be low, is loss or degradation of sagebrush habitat from wildfire. It was determined based on the lack of scientific evidence of declines in the plan area and low threat of sagebrush habitat loss from wildfire that there is currently not a substantial concern for the persistence of the species on the Inyo National Forest and thus it was not

considered to be a species of conservation concern. This is documented in the Rationales for Animal Species Considered for Species of Conservation Concern Inyo National Forest in the project record.

9012

Wolverine is a proposed threatened species and should be included as an at-risk species in the forest plans.

Response: The status of wolverine has changed since the start of the plan revision process. In 2013 when the forest assessments were being prepared, the U.S. Fish and Wildlife Service was evaluating the wolverine as a proposed threatened species under the Endangered Species Act. In August of 2014 as the draft environmental impact statement was being prepared, the U.S. Fish and Wildlife Service withdrew the proposed listing. In August 2016, after the draft environmental impact statement had been released, the U.S. Fish and Wildlife Service re-initiated the listing process of wolverine making it once again a proposed threatened species.

For the draft environmental impact statement, the wolverine was evaluated to determine if it should be a species of conservation concern and it was determined that at this time there are no contemporary verified or documented occurrences in the southern Sierra Nevada mountain range. The nearest documented contemporary occurrence is on the Tahoe National Forest over 200 miles to the north. This status was validated for the final environmental impact statement (chapter 3, Wildlife, Fish and Plants, “At-risk Terrestrial Species” section) and additional detail can be found in the biological assessment, which considers all threatened, endangered, candidate, and proposed species found on the Inyo National Forest.

If in the future, the wolverine is verified or documented to occur in the southern Sierra Nevada, the Forest Service would consider adding it as a species of conservation concern or as an at-risk species if the U.S. Fish and Wildlife Service determines the wolverine is a threatened or endangered species. If that occurs, the forest plan will be evaluated to determine if any changes may be needed.

9013

Animal and plant species, Forestwide (SPEC-FW-GDL), Guideline 1: Modify this guideline as indicated, "Known nest, roost, or den trees used by species of conservation concern, including surrounding trees that provide beneficial thermal or predatory protection, should not be purposefully removed with the exception of hazard trees and vegetation management activities mandated by state or federal regulations." Several agencies, including CPUC, NERC, CPUC, and CAISO, require SCE to maintain clearances between vegetation and its electric infrastructure to ensure public safety, protection from wildfire, regulatory compliance, and reliability of service. SCE also recommends that the U.S. Forest Service define the term "known" or provide areas of known nests, roost, or den trees to help with the environmental review process.

Response: Thank you for identifying additional conditions that may need to be exempt from this guideline. We agree that there are situations where compliance with other mandated regulations may apply and have re-worded SPEC-FW-GDL-01 to now read: “Known nest, roost, or den trees used by species of conservation concern or raptors, including surrounding trees that provide beneficial thermal or predatory protection, should not be purposefully removed, with the exception of the unavoidable removal of hazard trees and as required to meet other State or Federal regulatory requirements.” During project planning, the locations of known nest, roost, or den trees would be made available in order to evaluate where this guideline is applicable.

9014

Animal and plant species, Forestwide (SPEC-FW-GDL), Guideline 3: SCE concurs with the U.S. Forest Service guideline in that projects should protect at-risk species and their habitat by considering at-risk species early in the environmental planning processes. SCE recommends that the U.S. Forest Service add language to this guideline that states the U.S. Forest Service should provide project applicants all known information regarding at-risk species and their habitat to assist project proponents with the environmental review process for planning purposes.

Response: Guideline 03 included in the draft forest plan was removed and replaced in the final forest plan by a standard (SPEC-FW-STD-01) that requires design features, mitigation, and project timing considerations to be incorporated into projects that affect at-risk species (final plan, chapter 2, forestwide plan components for "Animal and Plant Species" section).

Sharing appropriate information with project proponents during the project planning process is a reasonable and prudent thing to do and does not need to be required by plan direction. However, to further emphasize the importance of communication and collaboration with others, a new goal (SPEC-FW-GOAL-04) was developed to emphasize sharing information to improve habitat conditions and ecological processes for at-risk species (final plan, chapter 2, forestwide plan components for "Animal and Plant Species" section).

9015

The following threats to condors should be considered in the Plans and the analysis: ingestion of garbage (also referred to as microtrash), communication and utility facilities, harassment at cliffs, lead bullets, target shooting and unauthorized shooting, i.e., wildlife poaching.

Response: The California condor is not known to occur on the Inyo National Forest but does have historic habitat and potential recovery habitat in the Sierra foothills west of the Sequoia National Forest. In the summer of 2017 a few California condor have started to explore that historic habitat on the Blue Ridge National Wildlife Refuge in Tulare County. If in the future condors began to use habitats on the Inyo National Forest, the forest plan would be evaluated to determine if any additional management direction was needed.

9016

Animal and plant species Desired conditions for the CA Spotted Owl and Marten described on pages 33-34 are inconsistent with the prescribed fire prescriptions described on pages 17 and 22. Prescribed burning with 40-50 percent of the burn acres high severity with up to 1,000 acre high severity patch sizes is not going to provide for the foraging, denning, and resting habitats and movement requirements of the Owl, Fisher and Marten. These sections of the Plan need to be made consistent.

Response: In the draft forest plan, desired conditions were developed for some vegetation types to describe the desired role of fire at the landscape scale (for example, draft plan, chapter 2, Desired Conditions, Terrestrial Ecosystems, TERR-MJF-DC-02 and TERR-UPPR-DC-02). These desired condition included the desired range of fire size and type and size of fire severity patches that would be sustainable and resilient when desired conditions were achieved. Since the current vegetation and fuels condition are not at the desired condition, and because there is variability in weather conditions when fires burn, the draft forest plan desired condition descriptions also included a description of acceptable high severity fire patch sizes that may occur. This was felt to be necessary so projects could be designed for landscape scale prescribed burns or to manage

wildfires to meet resource objectives that would be beneficial overall, even if portions of them exceeded the desired condition high severity patch sizes.

In the final forest plan, because of the confusion they created, these exceptions were removed from the desired conditions for TERR-DMC-DC-02 and TERR-JEFF-DC-02 (final plan, chapter 2, "Terrestrial Ecosystems and Vegetation," "Ecosystem Types" section). The acceptable amount and extent of potential high severity fire effects will be considered during project-level prescribed fire planning and during wildfire management decision-making on a case-by-case basis.

9017

The draft environmental impact statement lists the Plan components addressing the identified potential threats to at-risk terrestrial wildlife species, aquatic species, and plants. These components appear very broad and are difficult to locate in the draft environmental impact statement, which could result in inadequate application of protection measures simply because the draft plan is fragmented and difficult to use. A clearer relationship in the draft plan between specific at-risk species and their associated management direction, more-specific plan components for specific species, and cross-referencing draft environmental impact statement information in the draft plan could be helpful.

Response: The final forest plan has been reorganized so that all plan components for a given resource are listed in the same section. For example, in chapter 2, animal and plant species, there is a section on bi-state sage-grouse habitat and all plan components are listed in that section.

See also Response to 9000, which discusses the analysis of specific plan components that provide for the persistence of species in the final environmental impact statement.

9018

For at-risk species, the desired condition must be a description of the ecological characteristic that is specific enough to allow progress toward their achievement to be determined (219.7(e)(1)(i)), must be science based, and desired conditions within a plan area must not work against each other and must be mutually achievable. In addition, all of the other plan components must be based on desired conditions and must be integrated with each other. Currently the plans do not meet these requirements, which is a violation of the National Forest Management Act diversity requirement; therefore, reconsider the at-risk species desired conditions and associated plan components.

Response: See response to comment 4172 for a discussion about the specificity of desired conditions.

We recognize that the desired conditions need to be compatible across the different areas in the plan. The desired conditions for animal and plant species in the final plan focus on direction for management of habitats and to provide for specific, unique needs for a few species. These are designed to be compatible with the overall "Terrestrial Ecosystems and Vegetation" plan direction.

For most species, management to move towards and achieve the vegetation desired conditions will provide the ecological conditions needed by species to persist within the plan area over time. For some species, additional species-specific plan components were developed. The analysis in the final environmental impact statement was strengthened to more clearly explain how the plan components provide for each at-risk species (final environmental impact statement, chapter 3

"Wildlife, Fish, and Plants" section). See also Response to 9000 for a discussion of the process of evaluating plan components for at-risk species.

9019

Standards or guidelines for at-risk species are required, and without such standards and guidelines, any assertion or finding that forest plan direction will lead to better outcomes, including increased population numbers, greater genetic diversity, maintenance and restoration of relevant habitat characteristics, long-term viability, and other measureable goals, will be arbitrary and capricious; therefore, include specific standards and guidelines to protect at-risk species in the forest plans.

Response: The forest plan is required to provide ecosystem plan components and as needed, species-specific plan components to provide for the persistence of at-risk species within the plan area over time. The final environmental impact statement chapter 3 section on "Wildlife, Fish and Plants" includes an expanded discussion of the plan components that are designed to provide for at-risk species. See also response to 9000 for a discussion of forest-wide and species-specific plan components.

9020

The plan should include measures for all communally roosting bat species to be protected from habitat disturbance and white-nosed bat syndrome.

Response: With the confirmation of white-nose syndrome on the West Coast, a new plan Goal has been added to help share information to help reduce the risk of disease spread to bats. SPEC-FW-GOAL-06 in chapter 2 of the final plan reads: "Coordinate with State and Federal agencies and other partners to provide education materials and best management practices information to limit the potential spread of disease to caves and mines used by bats."

The guideline in the draft forest plan (SPEC-BAT-GDL-01) to consider construction of bat gates was found to more appropriately be stated as a forestwide potential management approach for animal and plant species in the final plan. This allows the protection of bat hibernacula and maternity colonies from disturbance to be met by many methods, including construction of bat gates or other methods of limiting or restricting access or mitigating the effects of disturbance.

9021

The species specific accounts and impact analysis in the environmental impact statement were inadequate to clearly quantify effects, as they were too qualitative, vague and general, which fails to take a hard look and is a violation of NEPA; therefore, the species accounts and impact analysis need to be made more robust.

Response: Since the forest plan is a programmatic document that does not authorize specific projects at specific times or in specific places, the analysis of the alternatives is necessarily less detailed than for individual projects. The species accounts were improved by adding more local information and consideration of threats specific to the Inyo National Forest. This information is summarized in the final environmental impact statement to provide an improved species specific analysis for wildlife, fish, and plant species (final environmental impact statement, chapter 3, "At-risk Terrestrial Species," "At-risk Aquatic Species," and "At-risk Plant Species"). We more clearly describe how the different alternatives would provide for the ecological conditions needed for each at-risk species to persist within the plan area.

9023

Correction to the stated absence of the American Peregrine Falcon on the Inyo National Forest: Kristie Nelson, wildlife biologist for Point Blue Conservation Science, observed a nesting pair of Peregrine Falcons on Negit Island during the summer 2016.

Response: This 2016 observation has been considered in the evaluation of the American peregrine falcon as a species of conservation concern, along with a 2005 observation of fledged young near Tom's Place. For the 2016 nesting attempt, forest biologists were unable to confirm successful nesting through follow up surveys of the area. After considering the best available scientific information, it was determined that there was not a substantial concern for the persistence of the American peregrine falcon within the plan area so this species was not determined to qualify as a species of conservation concern. This is documented in the Rationales for Animal Species Considered for Species of Conservation Concern for the Inyo National Forest.

9024

Additional critical habitat not listed.

Response: In preparing the Biological Assessment for the final environmental impact statement, an official list of species and critical habitat to consider was received from the U.S. Fish and Wildlife Service. In addition, maps of designated critical habitat for federally listed species were developed and considered. For the Inyo National Forest, designated critical habitat overlaps the national forest for: Sierra Nevada bighorn sheep; mountain yellow-legged frog (northern distinct population segment); Sierra Nevada yellow-legged frog; Yosemite toad; and Owen's tui chub. This is discussed in chapter 3 of the final environmental impact statement for "At-risk Terrestrial Species" and "At-risk Aquatic Species."

9025

The BE fails to address the effects of the alternatives on the identified threats to the species. The threats to the species, especially those under the control of the Forest Service, such as logging, grazing and other permitted activities, must be evaluated in the BE.

Response: The biological evaluation evaluates the consequences of adopting alternative B-modified on the Regional Forester's sensitive species that occur on the Inyo National Forest. The analysis is conducted at a programmatic scale because the forest plan does not authorize or approve any specific action. The analysis in the biological evaluation has been strengthened to more specifically discuss the ecological conditions and threats to persistence that occur within the plan area for each species. More detail has been added regarding relevant plan direction that addresses the threats to species has been added to the biological evaluation.

9026

Grazing, fire regime and especially timber harvest can degrade habitat, soil and water quality and negatively impact habitat for at-risk species and should be analyzed.

Response: The forest plan is a programmatic document that provides guidance for later site-specific projects and activities. The potential impacts of projects will be evaluated site-specifically when they are proposed.

The final environmental impact statement analysis for Wildlife, Fish and Plants examines the consequences of livestock grazing, changes in fire regime, and timber harvest and vegetation management where it's a key threat to at-risk species. This analysis has been strengthened in the

final environmental impact statement (chapter 3, “Wildlife, Fish and Plants” section) in the subsections for “At-risk Terrestrial Species,” “At-risk Aquatic Species,” and “At-risk Plant Species.”

9027

The tradeoffs of long-term benefits of restoring old forest conditions outweighing short-term effects to species that depend upon old forests is not documented in the analysis. The short-term effects must be disclosed.

Response: The analysis of effects in the draft environmental impact statement recognizes that short-term site-specific effects cannot be evaluated in detail because the forest plan provides guidance but does not authorize or approve any actual projects. However, some short-term effects that may typically occur can be generally described and the final environmental impact statement analysis was improved to more clearly discuss these potential tradeoffs for species that use old forests as a key ecological condition that provides for their persistence over time (final environmental impact statement, chapter 3, “Wildlife, Fish and Plants” section).

On the Inyo National Forest, the majority of the Sierra Nevada montane zone where old forest plan direction applies occurs in designated wilderness or inventoried roadless areas. The primary short-term effects to old forests will be from prescribed burning, wildfires managed to meet resource objectives and natural stressors like drought and mortality from insects and disease (final environmental impact statement, chapter 3, “Wildlife, Fish and Plants” section).

9028

Please conduct full and thorough current baseline inventories for all important and sensitive species. How have perennial flows been reduced over time? What reaches of streams are no longer perennial? No longer intermittent? What habitat is occupied with sensitive species and other important biota at present, vs. unoccupied? How will the agency work to restore species to areas that are so degraded and/or disturbed that animals cannot currently inhabit them? Where have native species been eliminated?

Response: The forest plan revision process relies on an assessment to identify conditions and trends which informs where changes to a plan may be needed. The assessment process and the plan revision process also emphasize the use of the best available scientific information that is readily available and does not require collection of new information.

While the specific questions asked are not evaluated in detail site-specifically, they are considered at the forest plan scale to determine how they affect the ecological conditions that are needed to provide for the persistence of some species or contribute to threats to the persistence of at-risk species. Trends in ecological conditions can be found in the “Terrestrial Ecosystems and Vegetation” section and the “Aquatic and Riparian Ecosystems” section of the final environmental impact statement. The documentation for species of conservation concern and the At-risk species section of the final environmental impact statement contain a discussion of the ecological conditions and threats for species of conservation concern.

9029

The comment on draft environmental impact statement p. 427 refers to "all threatened and endangered species" and provides a list of threatened and endangered species.

However, the list appears to be limited to the aquatic species and does not include a number of species that are federally designated as threatened or endangered.

Response: The final environmental impact statement analysis for wildlife, fish and plants addressed at-risk species, including threatened and endangered species, with separate subsections for "At-risk Terrestrial Species," "At-risk Aquatic Species," and "At-risk Plant Species" (final environmental impact statement, chapter 3, "Wildlife Fish and Plants" section). The sentence that you refer to is the subsection for "At-risk Aquatic Species." The language there has been clarified to say "all aquatic threatened and endangered species."

9030

There's no discussion anywhere about how the Forest is going to provide for the owl and marten habitats given the size and intensity of wildfire, and the trend of the insect and disease epidemic.

Response: On the Inyo National Forest, the trends in increased size and intensity of wildfires has been less than for other national forests on the west side of the Sierra Nevada (final environmental impact statement, chapter 3, "Fire Trends" section) but models project the trends to increase with changes in climate. Similarly, there has been an increase in the amount of tree mortality from the recent prolonged drought but it has been much less than the significant tree mortality that has been occurring on the west side of the Sierra Nevada (final environmental impact statement, chapter 3, "Agents of Change," "Insects and Pathogens" section).

The ability to provide sustainable amounts of wildlife habitat for the California spotted owl and Sierra marten is dependent upon the actual trends in vegetation change. On the Inyo National Forest, direction to address the trends in wildfires and insect and diseases is provided within the "Terrestrial Ecosystems and Vegetation," "Fire," and "Timber and Other Forest Products" sections in chapter 2 of the final forest plan.

9035

The single species management approach for California spotted owl, Pacific fisher and Sierra marten is not reflective of best available science, and does not work with the current wildfire, insect and disease impacts. These impacts are not considered within the documents making the desired vegetative conditions designed to maintain viable populations of these species (CASPO, fisher, marten) unrealistic; therefore, reconsider the single species management approach and reanalyze the effectiveness of the desired conditions taking the current conditions into consideration.

Response: The 2012 Planning Rule requires that forest plan direction be integrated across resources and that the plans need to "provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area" (36 CFR 219.9(b)(1). This evaluation of plan direction is done first by examining the ecosystem level plan direction, and species-specific plan direction is only added where needed. The final environmental impact statement has been updated with a Persistence Analysis appendix that analyzes how plan components provide the ecological conditions necessary to maintain viable populations of Species of Conservation Concern in the plan area (final environmental impact statement, appendix F).The final environmental impact statement analysis also better discloses the uncertainty of moving towards desired conditions given the current condition on the Inyo National Forest. See also response to 9009.

9036

The draft environmental impact statement does not adequately address how tree mortality has impacted habitat for at-risk species, and should explain how the activities carried out under the proposed action would affect the distribution and quantity of habitat remaining and reassess the ability of the proposed action to maintain the viability of these species.

Response: The dramatic change in condition that has occurred since the plan revision was initiated was a factor in the decision to revisit the proposed action and alternatives for the Sequoia and Sierra National Forests and prepare a revised draft environmental impact statement. However, the vegetation condition on the Inyo National Forest has not been as greatly affected by the recent insect mortality compared to the westside forests in the southern Sierra Nevada and it was determined that the proposed action and alternatives were still appropriate and an final environmental impact statement could be prepared. The analysis of the current condition of tree mortality and effects of the alternatives from dead trees has been reviewed and updated as necessary throughout the final environmental impact statement, including the sections in chapter 3 for “Wildlife, Fish and Plants.”

9037

At-risk species viability was not adequately addressed in the assessment phase of the planning process and feedback on this lack was ignored; therefore, the Forest Service should develop and include species-specific or habitat-specific viability analyses for each at-risk species.

Response: The Forest Assessment was completed in 2013, shortly after the adoption of the 2012 Planning Rule and included a table of potential species of conservation concern and federally-listed species and a list of the key ecological conditions and key threats that may affect them.

As an “early adopter” of the 2012 Planning Rule, we identified the value of having a more robust evaluation of species of conservation concern earlier in the plan revision process and “lessons learned” are being applied to the process that will be used for future plan revisions.

For the final environmental impact statement, the assessment of species persistence was updated and improved (final environmental impact statement, chapter 3, “Wildlife, Fish and Plants” section; and Persistence Analysis in appendix F). As a result of reevaluating the list of species of conservation concern, plan components that affect some species were clarified and additional plan components were added. The analysis of species persistence displays which plan components would provide for the ecological conditions needed for each species. This information is also summarized in the record of decision.

See also response to 9000 regarding the process used to develop species-specific plan components.

9038

The analysis states that the magnitude or extent of the effects of the forest plans on each of the at-risk species within the plan areas cannot be determined at the plan level, which is a violation of National Forest Management Act and the 2012 Planning Rule which requires the Forest Service to "maintain a viable population of each species of

conservation concern within the plan area" (36 CFR 219.9(b)(1)); therefore, the Plans must be modified to be specific enough to support this analysis.

Response: The analysis in the draft environmental impact statement of consequences for alternative B in montane forest did say that the changes to forest structure to achieve resilience, particularly in the focus landscapes could have short-term impacts on habitat conditions. It then stated that the magnitude of these impacts would be the subject of project-specific analyses and are beyond the scope of this programmatic analysis (draft environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Wildlife," Consequences section). This is true because the forest plan does not authorize and actions or determine specific future project locations. The final environmental impact statement has been clarified to state "The magnitude of these local impacts would be the subject of project-specific analyses and are beyond the scope of this programmatic analysis."

The analysis of the plan components that provide for maintaining the persistence of species of conservation concern has been strengthened in the final environmental impact statement. See response to comment 9000.

9040

The Plans currently do not adequately protect ESA listed species; therefore, the Forest Service must consult with the USFWS concerning ESA listed species and must make changes to plan components to protect species in accordance with that consultation.

Response: The 2012 Planning Rule requires that forest plans contribute to the recovery of federally listed threatened and endangered species and conserve proposed and candidate species within the plan area. To meet requirements of Section 7 of the Endangered Species Act of 1973, we initiated formal consultation with the U.S. Fish and Wildlife Service. A biological assessment has been prepared for the preferred alternative in the final environmental impact statement. Following conclusion of the objection process, if needed, the biological assessment will be amended and resubmitted and the U.S. Fish and Wildlife Service will issue a final biological opinion. Before a record of decision is issued, we will consider any recommendations in the final biological opinion.

9041

The Forest Service should consult with U.S. Fish and Wildlife Service on all species with historical ranges that overlapped the action area, or that occur in such a proximity to the action area that a project implemented under the forest plan may affect any threatened or endangered species.

Response: See responses to 9040 and 9024.

The biological assessment for the final environmental impact statement considers current and historic distribution of federally listed threatened, endangered, proposed and candidate species. The list of species to analyze was reviewed and agreed to by the U.S. Fish and Wildlife Service.

Some species, such as the wolverine, are historically known to occur in the southern Sierra Nevada but are not currently confirmed to occur on the Inyo National Forest using data quality standards adopted by the U.S. Fish and Wildlife Service. See response to comment 9012.

If changes occur in the future as a species is confirmed to occur on the Inyo National Forest or as the status for federally listed species change, the plans will be evaluated to determine if any

changes may be needed. All decisions for projects and actions funded or carried out by the Forest Service consider the potential impacts to federally listed species as required by the Endangered Species Act and Forest Service policy.

9042

The draft environmental impact statement states that the management approach under all alternatives at the programmatic level of the plan may affect, but is not likely to adversely affect federally listed species and none of the alternatives are likely to result in destruction or adverse modification of critical habitat. It is premature to make these determinations and we recommend analyzing the effects of the chosen alternative in the biological assessment before reaching a determination on how it may affect listed species or designated critical habitat. We refer you to 80 FR 26832 (Service 2015) in which the Service describes how we approach framework programmatic actions in the absence of project-specific information.

Response: See responses to 9040 and 9041.

The Forest Service agrees that the forest plan represents a framework programmatic action for the purposes of evaluating the effects of the proposal under Section 7 of the Endangered Species Act and has discussed this with the U.S. Fish and Wildlife Service. The analysis in the final environmental impact statement has been clarified to reflect the programmatic nature of the forest plan decision and is supported by the preparation of a biological assessment that has been submitted to the U.S. Fish and Wildlife Service during formal consultation.

9043

We believe the approach defined on page 307 is the appropriate approach to section 7 consultation. The determination on the adoption of the 2012 Planning Rule itself was found to be likely to adversely affect listed species due to the indirect effects of the planning rule. Similarly, forest plans are connected to the actions that will take place in the future pursuant to the plans and are reasonably certain to occur. Therefore, should any of the activities outlined in a forest plan be likely to result in the incidental take of a listed species, then the appropriate determination would be that the forest plan is likely to adversely affect the listed species in question.

Response: See response to comment 9042.

The U.S. Fish and Wildlife Service issued a biological opinion on the 2012 Planning Rule Section 7 consultation in March of 2012. They determined that the planning rule “is likely to affect listed species by prescribing the ways in which land management plans will provide for managing the species and their habitats.” They further determined that “the rule would require plans to support recovery of listed species, and thus is likely to result in significant beneficial effects to listed species.” The biological opinion does not determine that the rule is “likely to adversely affect listed species.”

In 2015, The U.S. Fish and Wildlife Service has officially clarified their interpretation of certain types of decisions like forest plans that do not commit to or approve any on-the-ground actions. The U.S. Fish and Wildlife Service considers these types of projects as framework programmatic actions and they have determined that since there is no commitment to on-the-ground actions, there is not incidental take of listed species.

As site-specific projects or activities are proposed that could affect federally listed species, they will require evaluation and compliance with Section 7 of the Endangered Species Act and as needed, the U.S. Fish and Wildlife Service may issue incidental take statements.

9044

Designation of critical habitat has in the past caused access restrictions, which has had a negative impact on recreation and public access to public lands; therefore, the Forest Service should be aware of the obstacles they may face in the future, and create a plan of action to effectively work with the Fish and Wildlife Service to protect endangered species while retaining public access to public lands.

Response: The U.S. Fish and Wildlife Service follows a public involvement process when they propose and designate final critical habitat. This process considers the science-based needs of the particular species for sufficient habitat to lead towards its eventual recovery and delisting. During the public involvement process, considerations of the social and economic impacts of designating critical habitats are considered by the U.S. Fish and Wildlife Service along with the biological needs of listed species. When appropriate, the Forest Service provides comments to the U.S. Fish and Wildlife Service when critical habitat occurs on and could affect management and uses of National Forest System lands.

The Forest Service considers the location of critical habitat when determining if plan components are needed to contribute to the recovery of listed species. When determining if plan components are needed, sources consulted include: recovery strategies and recovery actions from recovery plans; conservation actions from conservation agreements; conservation recommendations from conservation strategies; and conservation options from conservation assessments. The mere presence of critical habitat does not automatically restrict access. See response to comment 8374.

9045

Critical habitat designations for listed species needs to be analyzed again for managed forest health and having available productive forest lands.

Response: See response to comment 9044.

The U.S. Fish and Wildlife Service determines where critical habitat is designated. The mere designation of critical habitat does not restrict activities such as managing forests to improve forest health. However, if an approved recovery plan exists for a federally listed species, recovery actions would be considered when developing plan components that might constrain forest management activities and determine if lands are suitable for timber production.

For the Inyo National Forest, designated critical habitats exist for the Sierra Nevada bighorn sheep, Sierra Nevada yellow-legged frog, the northern distinct population segment of the mountain yellow-legged frog, Yosemite toad, and Owen’s tui chub. The vast majority of this critical habitat is located within designated wilderness, critical habitat for the Owen’s tui chub on the Inyo National Forest is designated for small areas in non-forested areas near the Hot Creek Fish Hatchery.

9046

The BE fails to evaluate the effects of Alternative A instead referring to the 2004 amendment environmental impact statement for an analysis of effects on RFSS. This is

inadequate because it does not examine any changes in species status of the effects of implementing the plans since 2004.

Response: The analysis in the biological evaluation includes comparisons of alternative B-modified (the final plan) to current management under alternative A. The status of each species within the Inyo National Forest plan area is described in the biological evaluation. The changed condition as a result of implementing the current forest plan since 2004 is reflected in the affected environment which is the same baseline for the analysis of alternative B-modified.

9047

The failure to analyze Alternative A in the BE is a problem for species that were RFSS but are not SCC and where protective standards and guidelines are not carried forward. Northern goshawk is an example.

Response: See response to comment 9046

The analysis in the biological evaluation was strengthened to show how alternative B-modified (the final plan) would provide for viability for Regional Forester sensitive species that were not listed as Species of Conservation Concern. For the northern goshawk, it was determined that known northern goshawk nest sites on the Inyo National Forest are distributed across the national forest, the species use multiple vegetation types, and there are currently no specific threats known to cause habitat loss. While climate change and potential drought related effects will likely exert pressure on the key ecological conditions that this species depends upon, it is hard to predict what long term role these stressors will have on the species' ability to persist in the planning unit over time. Overall, it was determined that best available scientific information does not indicate substantial concern about the species' capability to persist over the long term in the plan area (Inyo National Forest Species of Conservation Concern Rationale document, project record).

9048

A complete effects analysis and determination of effects for Sierra Nevada red fox is missing from the BE, leaving the decision maker and the public uninformed. The BE impact analysis for SN red fox refers to marten (p. 58-59). Using "cut and paste" for individual species' effects determinations does not adhere to the NEPA requirement for a "hard look" at impacts to species from agency activities; therefore, the impact analysis for SN red fox needs to be made more robust and specific to the species.

Response: An analysis for the Sierra Nevada red fox was included in the wildlife biological evaluation and all "cut and paste" language referring to marten was removed.

9049

The forest plan analysis in the BE is missing cumulative effects analysis for species, including the Sierra Nevada red fox. The BE incorrectly states that "future actions will be addressed in the specific project level NEPA" (p. 59). This is incorrect, NEPA requires disclosure and analysis of the effects to species from forest plans in the draft environmental impact statement and final environmental impact statement for the plans, not in future projects that tier to the plans; therefore, include cumulative effects analysis for each species in the BE.

Response: Language in the cumulative effects section stating that "future action will be addressed in the specific project level NEPA" has been removed from the biological evaluation, although that is a correct statement. All future proposed actions would be separately evaluated

with a site-specific environmental analysis, which would include evaluating the cumulative effects of those proposed actions relevant to the time and place where they are proposed.

The cumulative effects section has been updated to follow the same approach as the final environmental impact statement section for "At-Risk Terrestrial Species" and "At-Risk Aquatic Species." It provides an analysis of activities that may occur on lands adjacent to the Inyo National Forest that may impact sensitive species in a general context since the plan itself does not direct on-the-ground activities.

9050

The plans lack thresholds that would indicate when actions need to be taken to protect a species; therefore, develop specific management plans/objectives, monitoring plans, and thresholds for each at-risk species identified in the Plan.

Response: The plan monitoring program does not include thresholds because they are not a requirement of the 2012 Planning Rule or Forest Service Handbook (see 1909.12 Ch. 30). Thresholds are a potentially useful way to identify when the status of a variable exceeds the desired range, but can be problematic if the defined threshold is incorrect or doesn't take into consideration other environmental variables. Therefore, depending upon the variable being measured, the status and trend of monitoring data would be evaluated against the natural range of variation, reference site, or other target.

9051

Native species are a key part of the environment and the Plans lack strong conservation standards that would protect the full range of at-risk native species; therefore, consider including language that address the possibility of the reintroduction/recovery of wolverine and Sierra Nevada red fox into their historic range.

Response: Both the draft forest plan and the final forest plan include an overarching desired condition which states that "Sustainable populations of native and desirable nonnative, plant and animal species are supported by healthy ecosystems, essential ecological processes, and land stewardship activities, and reflect the diversity, quantity, quality and capability of natural habitats on the national forest. These ecosystems are also resilient to uncharacteristic fire, climate change, and other stressors, which supports the long-term sustainability of plant and animal communities" (SPEC-FW-DC-01, final plan, chapter 2, "Animal and Plant Species").

The wolverine is not known to occur within the Inyo National Forest. See response to comment 9012 for a discussion of the status of the species and how this was determined. Response to 9012 also discusses the approach that would be used if wolverine were to reestablish occupancy on the national forest.

For the final environmental impact statement, the Sierra Nevada red fox, a candidate species for listing under the Endangered Species Act, was not a species identified by the U.S. Fish and Wildlife Service as occurring within the Inyo National Forest plan area. Therefore, it is not considered an at-risk species for the Inyo National Forest. See response to comment 9048.

9053

Inyo County suggested providing mitigation banks in their scoping comments and this suggestion was not addressed in the draft environmental impact statement or the plans. Mitigation banks would allow for the rehabilitation of disturbed forest land in one area, as mitigation for a multiple use opportunity on another, resulting in a mutually

beneficial partnership with neighboring communities. Therefore, the use of mitigation banks should be incorporated into the plans.

Response: A new goal was added in the "Local Communities" section in chapter 2 of the final forest plan (LOC-FW-GOAL-04) that addresses the need to continue working with other Federal or State agencies that have requested restoration areas on the Inyo National Forest for mitigating disturbances to areas by their actions. This goal also expands the opportunities for local governments or private businesses to work with the Inyo staff to identify restoration areas and mitigation banks.

9055

Currently, the Plans lack protective standards for marten, spotted owl, Pacific fisher, northern goshawk and numerous fish and other aquatic species; therefore, include greater Wilderness protection, "old growth" focused management policies that protect high quality habitat and old stands of old growth trees, and additional protections of watersheds that support biodiversity.

Response: See responses 9000 and 9003 for a discussion of species-specific plan components included in the final plan.

The final environmental impact statement in chapter 3, "Wildlife, Fish and Plants" section, includes an analysis of plan components that would provide for the persistence of at-risk wildlife species. For many species, this includes reference to plan direction related to wilderness management (DA-WILD), old forest habitat (TERR-OLD), watershed management (WTR-FW), and animal and plant species (SPEC-FW).

9056

The draft environmental impact statement does not analyze the impact of more or less wilderness on species of conservation concern that exist in the proposed wilderness, wild and scenic rivers, and aquatic refuges in alternative C. We need to understand how these species will be affected without these proposed new wilderness areas (in other words, under alternative B). The additional proposed wilderness areas in Alternative C serve a dual purpose of increasing protected wilderness and increasing protection for threatened species and habitat.

Response: The analysis in the final environmental impact statement has been updated to more clearly describe the consequences of each alternative on at-risk species, including differences in recommended wilderness and changes in the aquatic conservation strategy. River segments found to be eligible for inclusion in the Wild and Scenic Rivers System are managed the same across alternatives B, B-modified, C, and D.

9057

Protection of at risk species may negatively impact livestock grazing where grazing overlaps at risk species habitat, and it is unclear in the Plans where at risk species protections take precedence over grazing allotments; therefore, clarify the Plans on that point and include language that does not curtail permitted grazing when managing habitat for at risk species.

Response: The 2012 Planning Rule requires that revised plans provide for ecosystem services and multiple uses, including livestock grazing (219.10 Multiple Uses). As part of that direction the plan must include standards or guidelines for integrated resource management to provide for multiple uses in the plan area (219.10 (a)). The plan components for at-risk species do not

necessarily take precedence over those for livestock grazing, but instead are intended to provide specific direction when needed to allow for managing sufficient ecological conditions to allow at-risk species to persist over time

9059

Despite extensive comments provided on the draft lists of species of conservation concern in February, there appears to be little to no improvement in the species of conservation concern and their associated rationale documents. The proposed plans remove protections from many species that were on the sensitive species list, but does not analyze the impacts of removing these protections on these species and the best available science is not addressed that indicates the species are still at risk; therefore, the Forest Service should disclose the impacts of the revised plans on all the currently covered sensitive species in the environmental impact statement and provide evidence for each sensitive species supporting the decision to not include them.

Response: Between draft and final environmental impact statement, the rationales for each species were updated and made more comprehensive and from that the Regional Forester revised the list of species of conservation concern (see both the animal and plant rationales for species considered for species of conservation concern, Inyo National Forest). The process included updating rank information from NatureServe, California Natural Diversity Database and California rare plant rank (plants only); more thorough investigations of species occurrence in the plan area; consideration of all species on other federal and state status listings (for example, forest service sensitive species status); improved descriptions of threats to persistence; and more comprehensive best available science.

Under the 1982 planning rule, Regional Forester's sensitive species were identified at a regional level and with best available scientific information for which forests they may occur on. For species of conservation concern, every Regional Forester's sensitive species is included in consideration to determine if, based upon best available scientific information, it is known to occur within the plan area; if they do occur in the plan area, we evaluate their key ecological conditions and threats to determine if there is a substantial concern for their ability to persist within the Inyo National Forest. The current Regional Forester's sensitive species are evaluated in the biological evaluations for animals and plants (see supporting documents).

The plan includes general forestwide direction to provide for resilient vegetation conditions which would provide ecological conditions for many species.

9060

Northern goshawk should be a species of conservation concern (SCC). It is a Regional Forester Sensitive Species, the Forest Service had the intent in 2014 to include this as an at-risk species, and the Forest Service did not identify the need to change protections in the Notice of Intent to prepare an environmental impact statement of the revised forest plans. The California state wildlife action plan recently designated Goshawk as a California "species of greatest conservation need" for the Sierra Nevada bioregion ('SWAP', CDFW 2015) and there exists substantial scientific information indicating concern about its persistence in the plan areas. The agency must include it as an SCC or document evidence to counter the prior classifications.

Response: The 2012 Planning Rule and implementing Forest Service Handbook (FSH 1909, chapter 12.5) includes criteria to determine which species to designate as species of conservation concern. An analysis was done to determine that there are 38 known northern goshawk nest sites

on the Inyo National Forest; the nests are distributed across the national forest, the species use multiple vegetation types, and there are currently no specific threats known to cause a substantial concern for habitat loss. It is acknowledged that climate change and potential drought related effects will likely exert pressure on the key ecological conditions that this species depends upon, though it is hard to predict what long term role these stressors will have on the species' ability to persist in the planning unit over time. The analysis determined that the best available scientific information about the northern goshawk does not indicate substantial concern about the species' capability to persist over the long term in the plan area. This is documented in Rationales for Animal Species Considered for Species of Conservation Concern for the Inyo National Forest.

9061

The Forest Service does not explain why the goshawk was not included as a SCC using best available science, and not including it is contrary to the science; therefore, the species should be included as a SCC and PAC, with survey requirement, limited operational periods and habitat retention areas and the additional recommendations submitted during scoping in National Forests in the Sierra Nevada: A Conservation Strategy (Britting et al;. 2013) should also be included in the revised plans.

Response: See response to comment 9060.

Although the northern goshawk is not a species of conservation concern, forestwide guideline for animal and plant species, SPEC-FW-GDL-01, provides that known nest, roost, or den trees used by raptors should not be purposefully removed except for hazard tress or unless otherwise required by state or federal regulations. This was expanded in the final environmental impact statement from applying only to species of conservation concern to also apply to raptors and it was expanded to also protect surrounding trees that provide beneficial thermal or predatory protection.

In addition, forestwide desired condition, SPEC-FW-DC-01, applies to habitats and the ecological conditions and processes that would provide for sustainable populations of native species. Combined with the standard described above, the Inyo staff retains flexibility to design projects that will nesting goshawks and nest sites.

9062

The following plant species meet the criteria for listing as species of conservation concern for the Inyo National Forest: *Astragalus kentrophyta* var. *ungulatus* (spiny milk-vetch); *Draba praealta* (tall draba); *Salix nivalis* (snow willow); *Tetradymia tetrameres* (dune horsebrush); *Thelypodium milleflorum* (many-flowered thelypodium)

Response: The Regional Forester added *Tetradymia tetrameres* and *Thelypodium milleflorum* to the SCC list due to confirmed locations on the plan area and substantial concern for their persistence due to limited distribution and immediate direct threats. Although *Astragalus kentrophyta var. ungulata* occurs close to the plan area boundary, it does not meet the criteria of occurring in the plan area until a location is confirmed. *Draba praealta* and *Salix nivalis* are known to occur on the plan area but there is insufficient information to suggest these species are at risk for persistence on the planning unit at this time. See final "Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest."

9063

The forest plans are lacking in protections for rare and endemic species, such as the *Batrachoseps* (of which several rare species occur on the three forests), which violate

the diversity mandate of National Forest Management Act; therefore, revise the plans to incorporate protection for rare and endemic species.

Response: The Inyo Mountains salamander (*Batrachoseps campi*) and Kern Plateau salamander (*Batrachoseps robustus*) are species of conservation concern on the Inyo National Forest.

In chapter 2 of the final plan, plan components relevant to persistence of at-risk species, including desired conditions, standards, guidelines, and goals, were added or improved to the "Animal and Plant Species" section.

New plan components were also written to better reflect the intent of watersheds, providing for long-term maintenance and restoration of functioning watersheds and habitat for the persistence of at-risk species.

Plan components for the forestwide watershed, riparian conservation areas, and aquatic species were refined to reduce redundancy; adjusted where plan components were located (aquatic species moved to the At-Risk species section); address public comments; and clarify how to move toward desired conditions.

In chapter 3 of the final environmental impact statement, the consequences of implementing the final plan are analyzed in the "At-risk Plant Species" section; in addition, the consequences to the ecological integrity of the ecosystems upon which at-risk plant species depend are analyzed in the "Terrestrial Ecosystems" and Aquatic and Riparian Ecosystems."

9064

The black-backed woodpecker and Panamint alligator lizard are currently under status review for listing by the USFWS and should be considered as at-risk species.

Response: The black-backed woodpecker and Panamint alligator lizard were considered for species of conservation concern listing because they occur in the plan area and are currently under status review for listing by the United States Fish and Wildlife Service. However, listing was determined not to be warranted because the best available scientific information about these species does not indicate substantial concern about the species' capability to persist over the long term in the plan area.

The full species rationale is available for review in the final "Rationales for Animal Species Considered for Species of Conservation Concern."

Black-backed wood pecker is not listed as a species of conservation concern due to its broad range across the Sierra Nevada and Cascades; no detectable decline in California; no limiting habitat factors within the plan area; the high potential for habitat creation from wildfires; and the sheer number of bird detections within the Inyo National Forest plan area. The best available scientific information about the black-backed woodpecker does not indicate substantial concern about the species' capability to persist over the long term in the plan area.

For Panamint lizard, the best available scientific information suggests that the number of populations is stable and likely greater than what is currently known. Limiting factors identified as threats to persistence for the Panamint alligator lizard are those likely to result in a change in water surface flow and riparian integrity, which at present are minimal. Habitat within the plan area is at low risk of loss or degradation from anthropogenic activities. In the future, climate

change has the potential to influence daily temperatures, precipitation amounts, and timing and type of precipitation.

9065

All species listed as Species of Greatest Conservation Need by the California Department of Fish and Wildlife that occur within the Plan area should be included as species of conservation concern; these include summer tanager, Mount Pinos sooty grouse, olive-sided flycatcher, yellow warbler, and northern goshawk

Response: One of the criteria for identifying species of conservation concern (FSH 1909.12_10) is to consider species identified by Federal, State, or federally recognized Tribes as a high priority for conservation. Through this process we did consider all species listed as Species of Greatest Conservation Need by the California Department of Fish and Wildlife that occur within the plan area. Through this process, Mount Pinos sooty grouse is determined to be a species of conservation concern for the Inyo National Forest. Summer tanager, olive-sided flycatcher, yellow warbler, and northern goshawk were determined not to be species of conservation concern. See the individual species rationale in the final "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest."

9066

Recent science indicates that the American Pika (*Ochotona princeps*) may become extirpated from California due to climate change, but it was not included as a species of conservation concern; therefore, include it as a species of conservation concern or explain why it was not included using best available science. [Note: this was also noted in CDFW letter 31860]

Response: Pika on the Inyo National Forest occurs in the Sierra Nevada, primarily in wilderness over 6000 feet in elevation. U.S. Forest Service Pacific Southwest Research Station monitors this species in the Sierra Nevada and indicates the species occupies every available habitat type and a wider range than once thought. The best available scientific information about the pika does not indicate substantial concern about the species' capability to persist over the long-term in the plan area. See the species' rationale in the final "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest."

9067

The mountain beaver (*Aplodontia rufa*) and the North American porcupine are not included as SCC even though the mountain beaver has suffered range contraction and the North American porcupine have been deliberately extirpated from their range in the Sierra Nevada to prevent tree girdling. These species are also important prey species for fisher; therefore, these species should be protected as species of conservation concern and returned to the forests of the Southern Sierra Nevada.

Response: Based on habitat conditions for Sierra Nevada mountain beaver, *Aplodontia rufa californica*, mountain meadows within the plan area have been stable. The best available scientific information about the Sierra Nevada mountain beaver does not indicates substantial concern about the species' capability to persist over the long-term in the plan area.

For the North American porcupine, there are no records of the species in the Biodiversity Information Serving Our Nation (BISON) database and a 2011 Central Sierra Environmental Resource Center study (http://www.cserc.org/wp-content/uploads/2017/01/CSERC_2011_porcupine_report.pdf) did not report observations on the

Inyo National Forest plan area. Porcupine does not meet the process criteria of occurring in the plan area to be considered as a species of conservation concern.

9068

Species that are rare but have limited available science have been precluded from consideration as SCCs; however, these are exactly the species that need to be added so that they are not extirpated. These include white-tailed jackrabbit (*Lepus townsendii townsendii*), Sierra Nevada snowshoe hare (*Lepus americanus tahoensis*), Sierra flying squirrel (*Glaucomys sabrinus lascivus*), mountain beaver, and porcupine.

Response: In the Biodiversity Information Serving Our Nation (BISON) database, there are no snowshoe hare or Sierra flying squirrel georeferenced observations on the Inyo National Forest plan area, and no other studies were found that included observations of these species in the plan area. These species do not meet the process criteria of occurring in the plan area to be considered as a species of conservation concern.

Western white-tailed jackrabbit (*Lepus townsendii townsendii*) does occur in the plan area, has a NatureServe global status rank of G5T5 and state rank of S3? (question mark means vulnerable with some uncertainty) and is on the California Department of Fish and Wildlife's species of special concern. We made an error in not considering this species for SCC listing and a rationale is now included in the final "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest." Since the last reported sighting in the plan area was 1955, this species did not meet the criteria to be identified as a species of conservation concern.

See response to comment 9067 for mountain beaver and porcupine.

9069

Monarch butterfly should be considered as a species of conservation concern due to reductions in their numbers from climate change and loss of their milkweed food source.

Response: A rationale for monarch butterfly has been added to the final "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest." Since the insect does not overwinter on the plan area, and only the overwintering population meets the rank criteria, the best available scientific information about the overwintering populations of monarch butterflies does not indicate substantial concern about the species' capability to persist over the long term in the plan area.

9070

Best available science indicates that Olive-sided Flycatchers are experiencing an alarming downward trend; therefore, it should be considered as a SCC.

Response: The best available scientific information about the olive-sided flycatcher does not indicate substantial concern about the species' capability to persist over the long term in the plan area. In eBird, there are 687 records of 969 individuals on the Inyo National Forest; within 5 miles of and including the national forest, there are 1,359 records of 2,024 individuals. In the Biodiversity Information serving Our Nation (BISON) database, it shows olive-sided flycatcher locations are well distributed across the range of the national forest.

9072

The development of the list of Species of Conservation Concern relied too heavily on the NatureServe ranking system and did not include all best available science, resulting in a list that includes too many species, which could lead to additional habitat protection that would lead to the loss of multiple use opportunities; therefore, reconsider the species on the list in light of best available science and balance the needs to protect those species with other Plan objectives.

Response: Species were reconsidered for listing between the draft and final plans. The criteria for identifying species of conservation concern (FSH 1909.12_10) directs the species must be known to occur in the plan area and that species with a NatureServe rank of G/T1 must be considered and are expected to be included on the list unless it can be demonstrated and documented that known threats for these species are not currently present or relevant in the plan area. The final rationale document "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest" includes the best available scientific information that is much more comprehensive than provided in 2016.

9073

Definitions and differences between "focal species", "At risk species" and "species of conservation concern" are currently lacking in the plans and should be added.

Response: These three items are defined in the glossary of the draft and final forest plan. At-risk species include both federally listed species under the Endangered Species Act and species of conservation concern. To be considered for listing as a species of conservation concern, a species must occur within the plan area and there must be a substantial concern for its ability to persist in the plan area. Focal species are used in the forest plan monitoring program as a means to infer the integrity of larger ecological systems and is found in chapter 4 of the final forest plan (chapter 5 in the draft plan).

9074

It is inappropriate to rely on current or future management to decide not to include a species as a species of conservation concern, especially when management actions allowed by the plans may negatively impact the species; therefore, use best available science to determine which species should be on the species of conservation concern list, not proposed forest plan management strategies.

Response: The final rationale document "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest" includes the best available scientific information for each species' rationale; this is much more comprehensive than provided in 2016.

9075

Species should not be excluded from the SCC list only because it is doing well within the forest, especially when BASI is showing declines; this could be a reason for more protective measures

Response: The criteria for identifying species of conservation concern (FSH 1909.12_10) directs the species must be known to occur in the plan area and that species with a NatureServe rank of G/T1 must be considered and species on other federal or state lists should be considered. The process does direct that considerations be focused on the plan area.

Animal and plant species were reconsidered between draft and final and the final rationale document "Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest" includes more robust best available scientific information for each species.

9076

California Department of Fish and Wildlife would like to collaborate to refine the list of species that are considered as SCC; with an emphasis on CESA listed species and species of conservation concern in California.

Response: All special animal status listings of the California Department of Fish and Wildlife are used for species consideration during the species of conservation concern listing process. The California Endangered Species Act listed species that are known to occur in the plan area were considered for species of conservation concern listing. All California Endangered Species Act species meeting the criteria for occurring in the plan area are included on the Species of Conservation Concern list.

However, if federally-listed threatened or endangered species are affected, additional mitigations or restrictions on livestock grazing may be required to comply with the Endangered Species Act. This would be determined site-specifically based upon the actual proposed grazing practices. As described in the final environmental impact statement, Wildlife, Fish and Plants Section, project-level decisions have been made to change livestock grazing within allotments that overlap occupied habitats for several federally-listed species, such as, Sierra Nevada bighorn sheep, Sierra Nevada yellow-legged frog, northern DPS of mountain yellow-legged frog, Yosemite toad, and Lahontan cutthroat trout.

9077

The forest plans lack fine filtered plan direction to provide protection for the Sierra Nevada bighorn sheep; therefore, make the standards and guidelines more robust to provide adequate protection.

Response: Related to bighorn sheep on the Inyo National Forest, the draft forest plan included one desired condition describing habitat and the risk of disease transmission from domestic sheep; one standard limiting increases in domestic livestock; one guideline to be consistent with the recovery plan; and one potential management approach to expand the bighorn sheep range.

Based upon comments received and a closer review of the plan components, the final forest plan strengthened the desired condition, splitting it into two separate desired conditions. A new goal was developed to address evaluating recreational pack goat uses. The standard addressing the risk of disease spread was strengthened and a new standard was added to address recreation disturbances. The guideline to be consistent with the recovery plan was made a forestwide guideline (SPEC-FW-GDL-03). Finally, the potential management approach was unchanged.

See also response to 9078.

9078

Formally adopt and include in the plan the Sierra Nevada Bighorn Sheep Recovery Plan (2007) in order to more fully commit to the recovery of the species and to be consistent with other agency's management plans. Include land management standards and guidelines based on the Sierra Nevada bighorn sheep recovery plan that will continue

to protect this species and its habitat on the Inyo National Forest in the event that this species is delisted as an endangered species.

Response: Appendix H in the final forest plan lists existing resource plans that also guide management and includes approved recovery plans for federally listed species, including the Sierra Nevada bighorn sheep.

See response to comment 9077 for a description of the plan components specific to bighorn sheep.

The final forest plan has plan components to address suitable habitat for different seasonal needs, the risk of disease transmission from livestock grazing and recreational pack goat use, and disturbance from recreation. The two standards (SPEC-SHP-STD-01 and -02) were developed to address specific recovery actions in the recovery plan.

In the future, if the Sierra Nevada bighorn sheep was delisted and no longer addressed under the Endangered Species Act, it would be evaluated and would almost certainly be determined to be a species of conservation concern. At that time, we would determine if plan components are sufficient to provide for the ecological conditions needed to ensure the continued persistence of Sierra Nevada bighorn sheep within the plan area or if additional plan components might be needed. It would consider the recovery actions that were completed and determine if any changes in plan direction may be needed, including adding, changing, or removing direction in light of the change in listing status. Future changes to the forest plan may require a plan amendment.

9079

Maintain consistency with the Sierra Nevada bighorn sheep recovery plan by revising the final sentence of the 'Vision' section (page 34) in the Inyo Forest Plan such that it reads, "The risk of disease transmission from domestic sheep or goats to bighorn sheep is near zero" [change in italics]. Additionally, this statement should be modified to recognize the importance of suitable habitat from nearby productive vegetation types including forest habitat.

Response: The wording for the desired condition (SPEC-SHP-DC-01) has been clarified to better address the description of habitats used by Sierra Nevada bighorn sheep.

In addition, to emphasize the risk of disease transmission, that portion was split out to a separate desired condition (SPEC-SHP-DC-02). See response to comment 9086.

9080

In the Inyo Forest Plan, Standard no. 1 (SPEC-SHP-STD-01) should be changed to read, "Do not increase existing livestock use if the increase is likely to/may be deleterious to bighorn sheep populations. In addition, existing livestock use can be curtailed when necessary to protect this species."

Response: The wording of the standard has been clarified to include managing both current and future livestock use that has a high risk of disease transmission to bighorn sheep. Standard SPEC-SHP-STD-01 in the final plan (chapter 2, animal and plant species) now reads: "Do not allow domestic sheep or goat grazing or pack goat use adjacent to bighorn sheep populations where relevant bighorn sheep risk assessment models show there is a high risk of contact and spread of disease, unless risks can be adequately mitigated."

9081

Revise plan components for bighorn sheep to be more consistent with the Sierra Nevada bighorn sheep recovery plan. For SPEC-SHP-DC (p. 34) create a second desired condition that recognizes the need to maintain a suitable buffer between domestic sheep and goats and Sierra Nevada bighorn sheep to minimize the potential for disease transmission. Modify SPEC-SHP-STD (p. 99) to state that domestic sheep and goat grazing will not occur in areas adjacent to Sierra Nevada bighorn sheep habitat where there is a high/unacceptable risk of contact (for example, "Eliminate livestock use in areas known to be potential sources of disease for Bighorn Sheep"). Address recreational activities, such as use of goats as packstock, where appropriate. For SPEC-SHP-GDL (p. 104), add "...or additional guidance." to the end of this sentence. While the U.S. Forest Service noted that there are no permits for grazing domestic goats on any of the National Forests, it does not definitively eliminate the possibility.

Response: See responses to 9077 and 9078 for discussion related to the species-specific plan components and how the recovery plan was considered in the development of the forest plan.

See responses to 9086 and 9079 regarding the desired condition to address disease transmission.

See response to comment 9080 regarding the change to SPEC-SHP-STD-01 using a risk assessment to manage the risk of disease spread.

SPEC-SHP-GDL 01 in the draft forest plan was changed. The original guideline was already adequately addressed through SPEC-FW-GOAL-04 and SPEC-FW-GDL-04, especially as they were strengthened in the final plan so it was removed from the final forest plan.

9082

In Appendix G (p.187), the year of the final recovery plan for Sierra Nevada bighorn sheep should be listed as 2007.

Response: Thank you for identifying this error. It has been corrected in “Appendix H, Existing Resource Plans” in the final forest plan.

9083

The Inyo Forest Plan components specific to Sierra Nevada bighorn sheep (desired conditions, standards, guidelines) should be incorporated into the Sierra and Sequoia Forest Plans in order to address the potential effects of domestic sheep grazing and other recreational activities (for example, use of pack goats) on Sierra Nevada bighorn sheep

Response: The Sequoia and Sierra National Forests will consider the plan components related to Sierra Nevada bighorn sheep that have been refined by the Inyo National Forest personnel and determine which may be appropriate to their individual plan areas. Both national forests will consult with the U.S. Fish and Wildlife Service regarding each plan’s compliance with the requirements of the Endangered Species Act, including how they contribute to the recovery of the Sierra Nevada bighorn sheep.

9085

The Inyo Forest Plan should include as a goal the expectation that a partnership will be established with other local and federal agencies and local landowners to implement and enforce buffer zones between livestock and bighorn sheep.

Response: The draft plan contained SPEC-FW-GOAL-01 which states: "Cooperate with private landowners to encourage resource protection on private lands." This was strengthened in the final plan to read "Cooperate with partners and private landowners to encourage resource protection and restoration across ownership boundaries" (final plan, chapter 2, Forestwide "Animal and Plant Species" section).

A new companion goal (SPEC-FW-GOAL-04) was also added to "communicate and collaborate with other agencies, Tribes, landowners, and partners to maximize opportunities to improve conditions in the plan area for at-risk species and the habitats and ecological processes on which they depend for survival" (final plan, chapter 2, Forestwide "Animal and Plant Species" section.

In addition, the goal SPEC-FW-GOAL-04 in the draft plan was renumbered to SPEC-FW-GOAL-03 in the final plan. It was revised to expand it to encompass working with the respective State wildlife agencies and the U.S. Fish and Wildlife Service to implement other recovery actions, which would include coordinating on managing disease risk to bighorn sheep, in addition to work to restore essential habitat (final plan, chapter 2, "Forestwide Animal and plant species" section).

9086

In the Inyo Forest Plan, SPEC-SHP-DC-01 for bighorn sheep, separate the habitat standard from the disease prevention standard and create an independent disease prevention standard (for example, SPEC-SHP-DC-02: "Minimize the risk of disease transmission from domestic sheep or goats to bighorn sheep to the maximum extent practicable").

Response: Thank you for the suggestion. The Desired Condition was split as suggested and a new SPEC-SHP-DC-02 was created and restated as: "The risk of disease transmission from domestic sheep or goats to bighorn sheep (based upon the best available risk assessment model) is reduced to the maximum extent practicable." See also responses to 9079 and 9080.

9087

Identify that predation is a threat to Sierra Nevada bighorn sheep and ensure predator control measures are not precluded by the Inyo Forest Plan.

Response: The final environmental impact statement discussion of threats was improved to recognize the potential for predators to limit Sierra Nevada bighorn sheep as discussed in the 2007 Recovery Plan and the latest 2008 5-year review from the U.S. Fish and Wildlife Service (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants, At-risk Terrestrial Species" section). As the state fish and wildlife agencies are responsible for the direct management of animals, the California Department of Fish and Wildlife implements a predator monitoring and management program to further recovery of Sierra Nevada bighorn sheep. This monitoring and management program involves GPS monitoring of mountain lions in the Sierra Nevada bighorn sheep range and working with USDA Wildlife Services to evaluate if individual mountain lions pose a legitimate threat to the recovery of Sierra Nevada bighorn sheep populations.

If these activities occur on National Forest System lands, they would comply with other relevant forest plan direction such as restrictions on motorized equipment use in designated wilderness areas, but are not otherwise precluded from occurring.

9088

The draft environmental impact statement analysis needs to be clarified regarding the Nelson's desert bighorn sheep and the Sierra Nevada bighorn sheep.

Response: The draft environmental impact statement correctly disclosed that the Sierra Nevada bighorn sheep was identified as a federally endangered species and the Nelson's desert bighorn sheep was identified as a species of conservation concern for the Inyo National Forest. The forest plan uses the general category of bighorn sheep because it includes some plan direction that applies to both species and some that are specific to just the Sierra Nevada bighorn sheep. The discussion and analysis for "At-risk Terrestrial Species" in chapter 3 of the final environmental impact statement has been reviewed and clarified to address each species better.

9089

In the draft environmental impact statement (page 326), the statement that "Nelson's desert bighorn sheep is not imperiled and is considered common and secure throughout its range" should be changed to acknowledge its unique status as one of the few remaining populations from the northern cold desert region. Based on the best available science information, this population of desert bighorn sheep is important and unique from a conservation standpoint.

Response: Thank you for the comment. The information has been incorporated into the rationale documents to evaluate the species for species of conservation concern status and also into the final environmental impact statement.

9090

Clarify in the draft environmental impact statement that the comingling of Nelson's desert bighorn sheep with domestic sheep and cattle in the White Mountains of the Inyo National Forest (observed by California Department of Fish and Wildlife staff) has potential to facilitate disease transmission in desert bighorn sheep. Also recognize that livestock have additional indirect impacts to bighorn sheep, including competition for food and water resources and displacement from suitable habitat. The Inyo National Forest should attempt to eliminate trespass livestock on their lands in the White Mountains

Response: The risk of disease transmission between domestic sheep and goats and bighorn sheep has been clarified in the final environmental impact statement, including the risk from trespass livestock that are outside of authorized grazing allotments or are outside of the terms of livestock grazing permits. In recent years, we have worked with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife to identify locations where livestock grazing by domestic sheep and goats poses a high risk of disease transmission to bighorn sheep. Through separate site-specific decisions, the Inyo National Forest personnel have removed domestic sheep and goat grazing from those areas.

However, there are reported instances where domestic sheep have been found to be trespassing onto National Forest System lands. These are typically animals that stray from adjacent private lands. The Forest Service has existing policy and procedures to address removal of trespass

livestock and the Inyo National Forest personnel actively work to remove stray animals when they are found and no additional plan direction is needed for this to continue.

The Recovery Plan for the Sierra Nevada bighorn sheep does not identify competition with cattle as a substantial concern that must be addressed to contribute to the recovery of the species. When site-specific decisions are made for authorizing livestock grazing in range allotments, the need to provide forage for native wildlife is considered and levels of authorized use are proposed and evaluated.

9092

Clarify that goats (especially packgoats) have a very low potential to transmit harmful diseases to bighorn sheep, based on the best available science information. Clearly distinguish when research conclusions pertain to sheep versus goats with regards to potential for disease transmission to bighorn sheep.

Response: As described in the final environmental impact statement and in the biological assessment, the best available scientific literature and the best scientific evaluations from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife indicate that both sheep and goats have a high potential to transmit disease to bighorn sheep. Since the spread of disease is believed to require direct contact, there may be a lower operational risk of direct contact for pack goats when they are properly tended but the risk remains if an unplanned situation allows goats to be unattended.

To address the uncertainty, a new goal was created in the final forest plan (SPEC-SHP-GOAL-01) to "Coordinate with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service to conduct a risk assessment of pack goat use on the Inyo National Forest and develop mitigations strategies to manage the risk of disease transmission, if needed." This risk assessment is envisioned to be scientifically rigorous, similar to the risk assessment developed for domestic sheep. If a high risk exists, and specific strategies are developed, appropriate future site-specific environmental analysis would occur prior to making a decision.

9093

Add information regarding the final rule listing the Sierra Nevada bighorn sheep as endangered (Service 2000; 65 FR 20). Also, revise the first sentence on page 326 of the draft environmental impact statement to clarify that the "Sierra Nevada bighorn sheep" was always referred by this name by the U.S. Fish and Wildlife Service. It was not until 2008 that the USFWS formally recognized the Sierra Nevada bighorn sheep as a valid subspecies.

Response: Thank you for the comment. The discussion of the status of the species has been updated and corrected in the final environmental impact statement (chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Species" section).

9094

The draft environmental impact statement should reference documents used to inform the implementation of the risk assessment model (for example, Baumer et al. (2009), Croft et al. (2009, 2010).

Response: Thank you for the comment. These references regarding the risk assessment for disease spread to bighorn sheep were added to the final environmental impact statement (chapter 3, Wildlife, Fish and Plants, At-Risk Terrestrial Species).

9095

The Forest Service and livestock grazing permittees should be represented in interagency and cooperative working groups to manage species of concern such as sage-grouse, golden trout and Sierra Nevada Bighorn sheep.

Response: The Forest Service, as a Federal agency, regularly participates on interagency and cooperative working groups related to species that occur on the national forest. Whether members of the public can attend or participate depends upon the governing rules of the entity that forms the working group. Federal agencies are governed by the Federal Advisory Committee Act that has specific criteria for when and how the public can participate and provide advice to the agencies. In addition, the Forest Service carefully evaluates attendance and participation in working groups commissioned by non-Federal entities to ensure compliance with agency policy.

The forest plan includes two Goals which encourage partnerships and working with other Federal, State, and local agencies and other groups. SPEC-FW-GOAL-04 expresses the intent to communicate and collaborate with others to better manage the wildlife resources of the national forest and SPEC-FW-GOAL-01 expresses the intent to cooperate with partners and private landowners to encourage resource protection and restoration across ownership boundaries (final plan, chapter 2, "Animal and Plant Species" Forestwide Components section).

We value permittees' input and historical knowledge and permittees have attended meetings for these working groups. In their absence our intent is for the Inyo National Forest range specialist to attend and follow-up with appropriate information sharing with permittees.

9054

Regarding the Bi-State sage-grouse, the U.S. Fish and Wildlife Service would be pleased to work with the U.S. Forest Service to identify the specific standards and guidelines, which we believe are necessary to afford conservation to the species and its habitat and which we believe will afford greater transparency and detail to more fully understand future management direction on potential discretionary actions. We recognize that not all potential future development impacts can be foreseen and therefore we believe there is substantial value to be gained in having an overarching intent on management direction coupled with as much specificity as is possible on those actions that can be reasonably anticipated.

Response: The best available scientific information was used to develop a much more comprehensive affects analysis and persistence analysis (see chapter 3 of the final environmental impact statement, Revision Topic 2, terrestrial ecosystem, sagebrush section; and terrestrial at-risk animals, Bi-state sage-grouse sections; and Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest; Persistence Analysis, Appendix F). We reviewed the analyses in the final environmental impact statement, along with a recent case study (Stringham and Snyder 2017) that looked at the sagebrush site potential in an area of Nevada and how that relates to the management direction in the Humboldt-Toiyabe National Forest Greater Sage-grouse Bi-State Distinct Population Segment Forest Plan Amendment. Using this information, the sage-grouse plan components were slightly altered, but we did not find that there was science to support using the same measures as the Humboldt-Toiyabe sage-grouse plan amendment (see final plan chapter 2, "Animal and Plant Species" section).

Compared to the draft plan, plan components were improved to better reflect ecological conditions achievable in the Inyo National Forest plan area. Three goals were added in the final plan, with goals SPEC-SG-GOAL-02 and 04 added to target collaboration with research and

other agencies, respectively, and goal SPEC-SG-GOAL-03 added to continue population and vegetation monitoring efforts. During review of the plan components, it was determined that some guidelines were redundant of other plan components and that the guideline regarding soil disturbance fit better as a standard, which is now SPEC-SG-STD-14. SPEC-SG-STD-15 was added to specify direction during wildfires.

9096

Much best available science concerning Bi-state sage-grouse was not adequately considered in the forest plans and environmental impact statement; therefore, the forest plans and environmental impact statement should be revised to address missing BASI.

Response: See response to comment 9054.

9115

The draft environmental impact statement for the Inyo Plan does not meet the legally required 'hard look' at the efficacy of sage-grouse conservation measures, with a rudimentary or completely lacking direct, indirect and cumulative effects analysis of impacts, particularly within occupied habitats for the Bi-State sage-grouse population, including a lack of consideration of impacts to wintering habitats, which is a violation of NEPA.

Response: See response to comment 9054.

In addition, the final plan defines “suitable habitat” in SPEC-SG-DC-01 as suitable sage-grouse habitat includes breeding, brood-rearing, and wintering habitats that are distributed to allow for dispersal and genetic flow. Other plan components addressing suitable habitat, which includes wintering habitat, include a desired condition specific to meadows (SPEC-SG-DC-09); and several standards regarding limited operating periods during breeding and nesting seasons, buffer direction in and around leks, and direction during wildfire (SPEC-SG-STD-06, 07, 10, 11, 12, and 15).

9116

The forest plans lack sufficient protective plan components for sage-grouse. Protecting sage- grouse leks as well as associated nesting and brood-rearing habitat are key to conserving the species, but these are not adequately covered in the Plan; therefore, revise the plans to provide adequate protection for this species.

Response: See response to comment 9054. Standards that specifically address leks, and nesting and brood-rearing habitat include SPEC-SG-STD-02, 06, 07, 10, 11, and 13.

9117

The Inyo National Forest should look to the recently completed Greater Sage-grouse Bi-State Distinct Population Segment Forest Plan Amendment for the Humboldt-Toiyabe National Forest for specific conservation measures for conserving sage-grouse and its habitat, including its utilization standards.

Response: We adopted many of these components either verbatim or with changes to address different conditions on the Inyo National forest, and also took a hard look at site-specific differences and similarities between the two national forests’ actions, habitat, local information, and current best available scientific information, including Stringham and Snyder (2017). The Stringham and Snyder (2017) study demonstrates the importance of determining plan area site

potential in developing achievable desired conditions in forest plans. We did not adopt numerical plan components (such as 7 inch grass cover or a specific canopy cover percentage) from the Humbolt-Toiyabe Plan Amendment, because we do not have scientific information to support their numbers, or any specific number. We committed to working with scientists to obtain those numbers, but strengthened plan components to protect sage-grouse, by protecting the general habitat features, requiring limited operating periods, minimizing disturbance within 4 miles of leks, and otherwise retaining or improving sage-grouse habitat protection (see the Final Plan, chapter 2, Forestwide desired conditions and management direction, animal and species, bi-state sage grouse, pp. 36-39).

9118

Identify and conserve essential sage-grouse habitat (Connelly et al. 2011; Manier et al. 2013; COT 2013; Aldridge et al. 2008). Designate for protection all occupied sage-grouse habitats

Response: See responses to 9054 and 9115.

9119

Manage or restore essential habitat so that at least 70 percent of the land cover is sagebrush steppe sufficient to support sage-grouse (SGNTT 2011: 6, citing Aldridge et al. 2008; Doherty et al. 2010; Wisdom et al. 2011; also SGNTT 2011: 7; Karl and Sadowski 2005; Doherty 2008; Connelly et al. 2000: 977, Table 3; Knick et al. 2013: 5-6) with 15 to 40 percent sagebrush canopy cover (Connelly et al. 2000; SGNTT 2011: 26, citing Connelly et al. 2000; Hagen et al. 2007).

Response: See responses to 9054 and 9115. Sagebrush within the plan area is not confined to sage-grouse range therefore there are plan components specifically for this habitat type, including TERR-SAGE-DC-01-04 and TERR-SAGE-GDL-01 and 02

9164

A Bi-State Sage-grouse alternative should be considered for the Inyo National Forest that would (1) Protect remaining relatively intact sagebrush and sage-grouse habitats and minimize "collateral damage" to other species habitats. These must be fully identified as part of this process, and intensive inventories conducted. (2) Enable passive restoration of lands "at risk" of weed invasion and/or suffering degradation or facing further losses of native species. This will better buffer these lands from adverse impacts of climate change effects (See Reisner et al., 20134; Beschta et al., 2012; Beschta et al., 2014. Agencies must act to manage lands as an important stronghold for sagebrush species. (3) Provide for careful and targeted active restoration - specifically for removal of harmful livestock facilities (and often linked roads) or other developments that may be damaging important, sensitive species habitats, populations, and watersheds. This includes actions such as removal of harmful fences and water developments (wells, pipelines, troughs, water haul sites - no water hauling can be allowed), terminating salt/supplement sites, and associated roading or other disturbance - especially since these intensively disturbed sites serve as epicenters for initial weed invasion and then subsequent outward spread (Belsky and Gelbard, 20005; USFWS, 20106; Reisner et al., 2013). Concentrated disturbance at these sites promotes

degradation and weeds, and incrementally eats away at the fabric of the sagebrush ecosystem.

Response: The Regional Forester's list of species of conservation concern for the plan area remains the same between alternatives B, B-modified, C and D to comply with the 2012 planning rule.

The Rule requires, as a general matter, that the plan have plan components to provide ecological conditions necessary to maintain a viable population of each species of conservation concern in the plan area. The ecological conditions may be those provided for through a coarse filter approach or through a fine filter (species-specific) approach.

Coarse filter plan components for sage-grouse and sagebrush are provided in many sections of the plan, especially the "Forestwide Components for animal and plant species" and the "Forestwide Components for Terrestrial Ecosystems and Vegetation." Fine filter plan components are also in different areas of the plan, including the sage-grouse and sagebrush sections.

Plan direction specific to inventory and monitoring includes goals SPEC-SG-GOAL 01 through 04.

Plan direction specific to sage-grouse and fencing includes standard SPEC-SG-STD 11; requiring all fences and other barriers constructed or replaced within 1.2 miles of known leks to be let-down fences and/or marked with fence markers.

See response 9102, 9124 and 9126 for specific plan direction relevant to sagebrush, grazing and cheatgrass.

Many standards for bi-state greater sage-grouse (especially SPEC-SG-STD 06, 07, 08, 11, 12, and 13) specify restrictions related to grazing, such as limited operating periods, fencing, and locations of salting, watering, feeding, etc.

9165

The 2015 Presidential Memorandum titled 'Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment' provides guidance that has not been followed in this planning effort. This Memorandum underscores the "avoid, then minimize, then compensate" hierarchy. This Memorandum also calls for planning to include "the identification of areas where development may be most appropriate, where high natural resource values result in the best locations for protection and restoration, or where natural resource values are irreplaceable." Bi-State sage-grouse habitats qualify as such irreplaceable resources. Mitigation measures in the Inyo Forest Plan must therefore avoid impacts entirely as a first order of business, then minimize those impacts through science-based standards, before the agency proceeds to compensatory mitigation that is to be applied only in cases where impacts to sage-grouse and their habitats cannot be avoided entirely or minimized.

Response: The 2015 Presidential Memorandum titled 'Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment' states that "Agencies shall each adopt a clear and consistent approach for avoidance and minimization of, and compensatory mitigation for, the impacts of their activities and the projects they approve." Since this is in reference to activities, it is most directed at the project level.

In the final environmental impact statement and final forest plan, we have met the memorandum's direction to inform the identification of areas where development may be most appropriate (for example, standard REC_FW-STD), where high natural resource values result in the best locations for protection and restoration (for example, recommending designation of wilderness), or where natural resource values are irreplaceable (for example, sage-grouse habitat standards).

9166

Tables 5 and 6 in the Inyo LMP contains errors, including an incorrect statement about grass cover related to shrub cover, a misleading title for Table 5, a limit on amount of annual grass should be included for brood rearing habitat, and there is no desired condition for grass height in nesting habitat.

Response: Between the draft and final plans this section has been changed and the tables removed. Plan components for the Inyo National Forest relate to site-specific information and ecological potential.

9168

We encourage continued collaboration with the Bi-State partners and management consistency with the Bi-State Action Plan. We urge the Inyo National Forest to review sage-grouse components directly with the Bi-State Technical Advisory Committee (TAC).

Response: Goal SPEC-SG-GOAL-01 directs managers to participate in collaborative forums such as the executive oversight committee, technical advisory committee, and local area working group to ensure agency interests are considered, and to collaboratively implement the Bi-State Action Plan to further sage-grouse conservation.

9169

The 2015 decision of the U.S Fish and Wildlife Service ("USFWS") to deny listing under the Endangered Species Act for the Bi-State Distinct Population of greater sage-grouse, which inhabit the planning area, is currently under judicial review. Should that agency's "not warranted" finding be overturned, the USFWS will consider the Policy for Evaluating Conservation Efforts ("PECE Policy") as the yardstick to determine the adequacy of existing regulatory mechanisms when considering once again whether listing is warranted. The lack of sufficient regulatory mechanisms to conserve sage-grouse and their habitats was identified as a primary threat leading to the USFWS warranted but precluded finding for greater sage-grouse in 2010. 75 FR 13910.

Alternative B will need to be strengthened to meet the level of protection recommended in the National Technical Team Report at minimum in order to represent effective conservation measures that have some chance of obviating the need to list the greater sage-grouse in general, and this population in particular, as Threatened or Endangered.

Response: The decision by the U.S. Fish and Wildlife Service that the bi-state sage grouse no longer needs protection under the Endangered Species Act was due in part to commitment of members of the bi-state local area working group and other partners, including the Forest Service, to collaboratively implement the Bi-State Action Plan to further sage-grouse conservation. The record of decision explains alternative B-modified and includes revisions and additional plan components for sage-grouse. In addition, the best available scientific information was used to develop a much more comprehensive affects analysis and persistence analysis (see chapter 3 of the final environmental impact statement, Revision Topic 2, terrestrial ecosystem, sagebrush

section; and terrestrial at-risk animals, Bi-state Sage-grouse sections; and Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest; Persistence Analysis, appendix F). The analyses in the final environmental impact statement, along with a recent case study (Stringham and Snyder 2017) that looked at the sagebrush site potential in an area of Nevada and how that relates to the management direction in the Humboldt-Toiyabe National Forest Greater Sage-grouse Bi-State Distinct Population Segment Forest Plan Amendment was used to review and revise the plan components specific to the Inyo plan area (see final plan chapter 2, "Animal and Plant Species" section).

9170

The Forest Service has failed to consider in detail the Sage-grouse Recovery Alternative submitted by WildEarth Guardians during the scoping phase of this plan revision.

Response: The best available scientific information was used to develop a much more comprehensive affects analysis and persistence analysis (see chapter 3 of the final environmental impact statement, "Revision Topic 2: Terrestrial Ecosystem," "Sagebrush" section; and "Terrestrial At-risk Animals," "Bi-state Sage-grouse" sections; and in appendix F "Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest; Persistence Analysis"). The analyses in the final environmental impact statement, along with a recent case study looking at sagebrush site potential in an area of Nevada and how that relates to management direction in the Humboldt-Toiyabe National Forest Greater Sage-grouse Bi-State Distinct Population Segment Forest Plan Amendment (Stringham and Snyder 2017) was used to review and revise the plan components specific to the Inyo National Forest plan area (see chapter 2, "Animal and Plant Species" section in final forest plan).

Compared to the draft plan, the desired conditions remained the same but the tables were removed since the desired conditions in the tables for sage-grouse nest and brood-rearing sites were not achievable in the Inyo National Forest plan area, due to natural site potential. Three goals were added in the final plan, with goals SPEC-SG-GOAL-02 and 04 added to target collaboration with research and other agencies, respectively, and goal SPEC-SG-GOAL-03 added to continue population and vegetation monitoring efforts. During review of the guidelines, it was determined that some guidelines were redundant of other plan components and that one guideline fit better as a standard, which is now SPEC-SG-STD-14. SPEC-SG-STD-15 was added to specify direction during wildfires.

9097

Science concerning impacts of cattle grazing on sage-grouse was not adequately considered.

Response: The best available scientific literature specific to Inyo National Forest populations of Bi-State greater sage-grouse population and threats, including grazing, has been reviewed and is referenced in the final environmental impact statement and species rationale (see chapter 3 of the final environmental impact statement, "Revision Topic 2: Terrestrial Ecosystem," "Sagebrush" section; and "Terrestrial At-risk Animals," "Bi-state Sage-grouse" sections; and in appendix F "Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest; Persistence Analysis"). Bi-state greater sage-grouse and grazing particularly overlap with respect to perennial grass cover. Values identified in some scientific studies are for other ecosystems and may not be attainable within the plan area. For example, grass cover is much higher in sagebrush systems north of the plan area where summer precipitation is higher.

Perennial grass cover is measured when nests are successful late in the summer (June/July). Perennial grass cover is measured at "un-successful nests" when that nest is abandoned, however, this can happen earlier in the year (April/May). This has led to a misrepresentation of the grass cover needed for nest success, as the grass heights can vary from April to July based on precipitation, grazing systems, sagebrush community potential, etc. New best available science is showing that this element may not be the best measurement, and new protocols are being developed to try to address this issue. Inyo National Forest commitment to this important ongoing work is identified in goals SPEC-SG-GOAL-01 & 02.

9110

The analysis for sage-grouse violates the NEPA "hardlook" and scientific integrity standards because it fails to mention livestock grazing as a threat to greater sage-grouse. Given the scope and extent of livestock grazing across Bi-State sage-grouse habitat, the environmental impact statement should include quantitative estimates of the impacts to sage-grouse.

Response: See response to comment 9097.

9102

Science illustrating the role of livestock grazing in increasing the spread of cheatgrass and thus degrading sage-grouse habitat is not addressed.

Response: Discussions on the role of livestock grazing on invasive annuals, including cheatgrass, along with the supporting best available science, is in the chapter 3, revision topic 2, of the final environmental impact statement, terrestrial ecosystem sections (including sagebrush) and revision topic 3 "Productive Livestock Grazing" sections.

Direction related to livestock grazing and invasive annuals in sage-grouse habitat in chapter 2 of the forest plan includes desired conditions, standards, guidelines and goals, including TERR-SAGE-DC-02, SPEC-SG-ST-01, INV-FW-GOAL 04, INV-FW-STD 03, and INV-FW-GDL 01. The last three plan components would be included in any grazing allotment analysis.

In addition, cheatgrass on Inyo National Forest is a focal species for monitoring which may provide future opportunities for evaluating the role of grazing on cheatgrass impacts on the Inyo National Forest within population management units.

9111

Livestock grazing contributes to cheatgrass spread through direct (hoof seed spread) and indirect (reduction of native perennial grasses and biological soil crusts) means, which negatively impacts sage-grouse habitat.

Response: See response to comment 9102.

9103

Science concerning the impacts of livestock grazing on riparian habitats, which are important habitats for sage-grouse, is not addressed.

Response: Best available science was used to analyze impacts of livestock grazing on riparian habitats in chapter 3 of the final environmental impact statement, "Revision Topic 2: Terrestrial Ecosystem," Sagebrush" section; and "At-risk Terrestrial Species"). Direction in the forest plan for meadows within sage-grouse habitat is provided in desired conditions SPEC-SG-DC-03 and

09, and standard SPEC-SG-STD-08; and direction for all suitable habitat is covered in many plan components (see response to comment 9115).

See also chapter 4 (Forest Plan Monitoring) of the final forest plan for monitoring questions and associated indicators that evaluate select ecological conditions for key characteristics of aquatic ecosystems. Bi-state sage-grouse population studies may provide opportunities to address sight specific questions including current grazing standards within the White Mountain Population Management Unit.

9122

The lone standard in the proposed forest plan that requires improvements to livestock grazing practices specifically for sage-grouse habitat protection reads as follows: "Do not locate new proposed salting, supplemental feeding locations, livestock watering and handling facilities on sage-grouse leks." To provide robust management that meets avoidance and minimization imperatives and is in accord with the best available science, the Forest Service will need to change this standard to read, "Do not locate new proposed salting, supplemental feeding locations, livestock watering and handling facilities within 4 miles of active sage-grouse leks."

Response: Livestock grazing practices are directly and indirectly specified in forest plan direction for sage-grouse and sage-grouse habitat.

Limited operating periods are identified for sage-grouse suitable breeding (SPEC-SG-STD-06) and nesting (SPEC-SG-STD-07) habitats and seasons for any activities that would cause disturbances during the established time periods.

Standard SPEC-SG-STD-08 directs that key areas in meadow or upland habitats be established when conducting livestock grazing allotment assessments.

Standard SPEC-SG-STD-11 requires all fences and other barriers constructed or replaced within 1.2 miles of known leks to be let-down fences and/or marked with fence markers.

Standard SPEC-SG-STD-13 to not locate new proposed salting, supplemental feeding locations, livestock watering and handling facilities on sage-grouse leks is the same as the draft. The 4 miles suggested by the commenter is well outside that recommended in the potential conservation buffer distances presented in table 1 of Manier et al 2014 paper, They suggested a 0.25 buffer for activities, however, 0.25 buffers around leks are two dimensional circular polygons that often include a road, a lake, or other non-suitable habitat. To avoid this, the focus should be connective suitable habitat that results in a logical non-disturbance area.

9129

There are meager and minimal standards and actions in the Plan related to greater sage-grouse and migratory birds. Examples of the habitat and population needs of sage-grouse, many of which are similar to some migratory bird species of concern include: Large expanses of intact sagebrush with relatively dense cover, 7-9 inches or greater of protective herbaceous nesting cover in uplands, structurally intact complex sagebrush, healing meadows, springs, seeps, streams and other riparian areas. Habitats must be free of grazing, energy, treatment and other disturbance throughout sensitive seasonal periods - including breeding, nesting, brood rearing and wintering periods, for example.

Response: See responses to 9122, 9124, and 9126.

9121

The words "sage-grouse" are not even mentioned in the Forestwide Rangeland Health Standards, a curious omission given that habitat requirements relating to sensitive species and the need to maintain their population viability are commonly incorporated into Rangeland Health Standards, and because livestock grazing is known to adversely affect the Bi-State population of sage-grouse.

Response: The “Rangeland Health Standards” appendix was not carried forward in the final forest plan.

We reviewed the rangeland assessment procedures (methodology) and updated the procedures with best available science. These procedures have been added as a forest specific supplement to the R5 Rangeland Analysis and Planning Guide (R5-EM-TP-004). These procedures can then be updated without the need for a forest plan amendment. A specialist report will be included in the record to document what the supplement will look like. The supplement will be released by the Forest Supervisor when the final record of decision is signed.

Analysis of grazing effects to rangelands and other forest vegetation types are provided in the final environmental impact statement. The best available scientific literature referenced in the final environmental impact statement suggests that adaptive management is needed to reduce anthropogenic stressors, such as livestock grazing, to provide for resilient terrestrial and aquatic ecosystems, particularly in sage steppe habitats important to sage-grouse (see the terrestrial ecosystems section and aquatic and riparian ecosystems section in chapter 3, revision topic 2, and the benefits to people and communities, rangeland products and management section in chapter 3, Revision Topic 3).

Forest plan direction for rangeland, including desired conditions, goals, standards and guidelines, is provided in chapter 2, under social and economic sustainability and multiple uses. In addition, see response to comment 9122.

9123

Livestock grazing should be managed to support desired conditions for sage-grouse nesting and brood-rearing habitat. Require that grazing strategies maintain at least 7 inches average grass height in nesting and brood-rearing habitat in sage-grouse range (Connelly et al. 2000). Restrict grazing until the completion of sage-grouse breeding and nesting period, and seasonally remove livestock from late brood-rearing habitat to allow sufficient regrowth of native grasses to ensure adequate residual height. Limited winter grazing may be appropriate, as long as it leaves sufficient residual grass height for nesting the next breeding season (W. Watersheds Project v. Salazar, 843 F.Supp.2d 1105, 1115 (D. Idaho 2012), citing Braun (2006, unpublished); W. Watersheds Project v. Dyer, 2009 WL 484438, at * 21 (D. Idaho 2009)). Incorporate sage-grouse habitat objectives and management considerations into all grazing allotments through Annual Operating Instructions, allotment management plans, and permit renewals.

Response: Sage-grouse standards SPEC-SG-STD-01 through 13 directly and indirectly include livestock grazing activities and this direction will be incorporated into existing and new grazing permits as required by Forest Service policy (FSH 2209.13-16.2).

For example, limited operating periods are identified for sage-grouse suitable breeding (SPEC-SG-STD-06) and nesting (SPEC-SG-STD-07) habitats and seasons for any activities that would cause disturbances during the established time periods.

9128

Various studies have found that very often grazing systems do not work, and that removal of grazing stress is the most effective for preserving sage-grouse. At least 6 inches of stubble height must remain on all riparian/spring/meadow area herbaceous species at all times, including drier sites not right on the greenline. This must be applied to all species - not just Nebraska sedge - and during all periods of livestock use. Riparian shrub browse and/or breakage must be limited to 5% of livestock-accessible new growth. 10 years of rest of pastures with damaged riparian resources must be fully considered to jump start recovery, and prevent further degradation.

Response: See responses to 9097, 9105, and 9123.

9124

Control grazing to avoid contributing to the spread of cheatgrass in sage-grouse habitat (Reisner et al. 2013; Reisner et al. 2015; Chambers 2008). The desired condition of less than 5 percent of annual grass in sage-grouse nesting habitat (p. 33, Table 5) may be impossible to achieve unless grazing is managed to avoid contributing to spread on the landscape.

Response: See response to comment 9102 regarding cheatgrass. The descriptions in desired conditions for range livestock grazing (RANG-FW-DC-01 through 03) directs to support native species in rangelands. Cheatgrass is present in many areas on the Inyo National Forest and surrounding areas, even in non-livestock occupied areas. It is also spread by wind and water. Grazing strategies, such as that outlined for range in standards RANG-FW-STD-01 through 08, are designed to promote native vegetation in order to meet the desired conditions and reduce the establishment and spread of non-native species, such as cheatgrass.

9126

The recovery of sagebrush "treatment" areas is further complicated by livestock grazing, which can hamper the establishment of native plants and spread the seeds of noxious weeds such as cheatgrass. In the absence of livestock grazing, cheatgrass does not spread rapidly after fire (Ponzetti et al. 2007). Lambert (2005) recommended protecting re-seeded areas from livestock grazing for no less than 3 to 5 years. However, this standard is virtually never adhered to in practice in the West, where virtually every acre of public land falls within a grazing allotment. The new LRMP must include standards that preclude livestock grazing for several years after habitat treatments to minimize the opportunity for invasive weed establishment.

Response: See response to comment 9124. Sage-grouse standards (SPEC-SG-STD 01-05) require that forest activities be mitigated to promote habitat restoration and recovery. Grazing guidelines RANG-FW-EDL-01, 04, 05 also require that grazing management be adjusted if desired conditions are not being achieved.

9125

The Forest Service must also consider a provision that would administratively allow permanent retirement of livestock grazing permits on a voluntary basis when permits are relinquished within sage-grouse habitats, as well as a provision that requires any

livestock grazing permit that is relinquished within occupied sage-grouse habitat to be permanently closed to future grazing.

Response: Federal regulations of grazable forage producing rangelands currently do not have a process for voluntary retirement of allotments. Federal code 36 CFR 222.2 directs the Forest Service to make capable and suitable lands available for grazing.

Rangeland capability and suitability are not being re-analyzed during forest plan revision.

9112

Riparian areas are critical to maintaining sage-grouse populations and livestock tend to concentrate in these areas, especially in the hot seasons, where they can overgraze and damage habitat.

Response: See response to comment 9103

9104

There is an extensive literature showing that livestock can degrade sage-grouse habitat by increasing the risk of high intensity fires by altering the dominance of shrub and forb species, by increasing spread of non-native invasive plants, by compacting soil and reducing moisture content and infiltration, and by increasing the fine fuels that carry fire. Cattle fecal pats readily ignite, are a common source of spot fires, and release extreme amounts of energy when burning.

Response: See response to comment 9102. Cattle fecal pats were not considered separately from other fuels.

9153

Populations of grouse occurring within grazing allotments need to be monitored before and after periods of grazing.

Response: See responses to 9097, 9105, and 9123.

9154

Utilize Ecological Site Descriptions ("ESDs") to conduct land health assessments to determine if standards of range-land health are being met. Conduct land health assessments that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving sage-grouse habitat objectives. If local/state seasonal habitat objectives are not available, use sage-grouse habitat recommendations from Connelly et al. (2000) and Hagen et al. (2007).

Response: See responses to 9121 and 9122. The procedures in the R5 Rangeland Analysis and Planning Guide (R5-EM-TP-004) have been modified for an Inyo National Forest specific supplement in order to assess to determine if standards of range-land health are being met.

9155

Livestock drives could negatively impact sage-grouse populations during the nesting season. Livestock drives should be routed to avoid sage-grouse leks and nesting habitat during the strutting and nesting seasons

Response: See response to comment 9122.

9113

Water developments can concentrate livestock grazing in areas important as sage-grouse habitat especially during the late brood-rearing period.

Response: Standards SPEC-SG-STD-12 and 13 provide direction to manage permitted watering facilities to prevent injury and to not locate new salting, supplemental feeding locations, livestock watering, and handling facilities on sage-grouse leks. In addition, rangeland livestock grazing goal RANG-FW-GOAL-03 directs that impacts to fisheries, wildlife, recreation, watershed, and rangelands be considered when designing rangeland improvements or structures, such as water storage structures

9120

In considering future water developments, the National Technical Team (2011: 16) recommended to authorize new water development for diversion from spring or seep source only when priority sage-grouse habitat would benefit from the development. This includes developing new water sources for livestock as part of an AMP/conservation plan to improve sage-grouse habitat. For existing water developments, the National Technical Team prescribed the following: Analyze springs, seeps and associated pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within priority sage-grouse habitats. These should be incorporated as plan components.

Response: See response to comment 9113. Additional direction is given for aquatic and riparian special habitats (desert springs, seeps, and fens), which are considered "special aquatic features" and relevant plan components are in the "Riparian Conservation Area" section. Guideline MA-RCA-GDL-04 provides direction during permit reissuance for livestock, to evaluate impacts of facilities on the riparian conservation areas and consider relocating existing livestock facilities outside of meadows and riparian areas. And specifically for springs and seeps there are desired conditions RCA-SPR-DC-01, 02, and 03.

Guideline SPEC-FW-GDL-05 directs that water developments (such as a diversion or well) should be avoided near streams or seeps and springs where there is high risk of dewatering aquatic and riparian habitats where at-risk species occur.

9130

Plan components should be included that prevent use of temporary water haul sites and artificial water sites, including from pipelines, during sage-grouse breeding season.

Response: See responses to 9122 and 9113.

9099

Science concerning minimum population size should be addressed.

Response: Plan components SPEC-SG-GOAL-01, 02 and 03 acknowledge our commitment for ongoing work with research and science. In 2016 Inyo National Forest invested about $30,000 towards year one of a population study in the White Mountains Population Management Unit.

9100

Science concerning habitat impacts and restoration should be considered.

Response: Best available scientific information concerning habitat impacts was used in the "Environmental Consequences to At-risk Terrestrial Wildlife Species" section of revision topic 2, chapter 3 of the final environmental impact statement, and final species rationale for the bi-state sage-grouse (see Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest).

Plan components are designed to mitigate impacts. For example, goals SPEC-SG-GOAL-01, 02, and 03 acknowledges our commitment for ongoing work with research and science across the Bi-state range. Restoration projects on Inyo National Forest are ongoing and direction is provided in SPEC-SG-STD-01 & 03. Where these overlap with monitoring, in time such efforts can be better understood.

9114

The environmental impact statement does not disclose the amount of livestock fencing, and does not address the negative impacts that livestock fencing has on sage-grouse, such as collision risk, facilitation of exotic and invasive plant spread, increase mortality of sage-grouse by increasing predation rates through increased perches for raptors, and habitat fragmentation, which can lead to competition for fewer suitable nesting sites, reduced food supplies, and the isolation of breeding habitat from brood-rearing areas and leks from nesting habitat.

Response: Bi-state greater sage-grouse is a species of conservation concern. The species of conservation concern list is a new element required by the 2012 Planning Rule intended as a proactive step to prevent species from becoming federally listed; it will replace the Regional Forest's list of sensitive species (FSH 2670). Since it is an at-risk species, we manage resources to provide the type of habitat and other conditions that the species need to persist on the national forest. Plan direction specific to predator perches or fences is in standards SPEC-SG-STD-10 and 11, including direction to prevent development predator perches and injury from fencing.

See also response to 9235.

9107

The known threats to greater sage-grouse in the draft environmental impact statement conspicuously left out significant threats, listing only "pinyon-juniper expansion and conifer encroachment into sagebrush habitats, invasive species, and predation by ravens" as threats. This list is incomplete and misleading, which constitutes a failure to gather appropriate baseline information and conduct the legally required 'hard look' at environmental impacts pursuant to NEPA.

Response: The best available science on sage-grouse, sage-grouse habitat and primary threats within the plan area are addressed in the final environmental impact statement and species rationale, and are addressed with plan components in the final plan (see chapter 3 of the final environmental impact statement, revision topic 2, "terrestrial ecosystem, sagebrush" section; and "at-risk terrestrial species, bi-state sage-grouse" section; and the "Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest"). The list includes expansion and encroachment of conifers, predation, livestock grazing, fire and cheatgrass, and development.

9108

"Human developments" are listed as a key risk factor for sage-grouse on the Inyo National Forest Assessment, but were omitted from the list of risk factors in the draft environmental impact statement.

Response: Developments are included as risk factors in the "At-risk Terrestrial Species" section, Revision Topic 2, chapter 3, of the final environmental impact statement.

9109

Threats that should be addressed include impacts of domestic livestock grazing, tall structures, overall disturbance and off-road vehicle use.

Response: See response to comment 9101, 9107 and 9108.

9101

Science concerning necessary protective buffer distances for sage-grouse leks (Manier et al. 2014) should be incorporated into the forest plan standards and guidelines.

Response: Standards SPEC-SG-STD-10, 11 & 13 in the final plan provide lek buffer direction distances that are within the potential conservation buffer distances presented in table 1 of Manier et al. (2014), with the exception of that for "activities." The 0.25 mile buffer recommended by Manier et al. (2014) for activities around leks are not practical on the Inyo National Forest because they are two dimensional circular polygons that often include a road, a lake, or other non-suitable habitat. To avoid this, the focus is on connective suitable habitat that results in a logical non-disturbance area.

9106

Science concerning the negative impacts of tall structures, including transmission lines, on sage-grouse habitat and use is not adequately considered.

Response: The best available science on sage-grouse habitat and tall structures, including transmission lines is considered in the final environmental impact statement and species rationale (see chapter 3 of the final environmental impact statement, Revision Topic 2, "Terrestrial Ecosystem," "Sagebrush" section; and "Terrestrial At-risk Animals," Bi-state Sage-grouse" section; and Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest).

Mitigation for predator perches are specifically identified as a standard SPEC-SG-STD-10, providing lek buffer direction distances that are within the potential conservation buffer distances recommended in table 1 of Manier et al. 2014 paper.

9131

The impacts of tall structures, such as transmission lines, on sage-grouse habitat and use are inadequately addressed in the plans; therefore, include standards and guidelines that limit tall structures in sage-grouse habitat.

Response: See response to comment 9106

9151

Apply a 4.66-mile buffer around leks precluding industrial uses.

Response: See response to comment 9101. Buffer direction on the Inyo National Forest is based on land allocations within the vicinity of the three known leks.

9098

Science concerning negative impacts of livestock fencing on sage-grouse was not adequately considered.

Response: The draft and final forest plans include mitigation for fencing; standard SPEC-SG-STD-11 (final plan, chapter 2, "Animal and Plant Species" section) requires all fences and other barriers constructed or replaced within 1.2 miles of a known lek in suitable habitat must be let-down fences and/or marked with fence markers. We have an ongoing fence marking effort; in 2016, about 3 miles of fencing in the White Mountain Population Management Unit was accomplished.

See response to comment 9235.

9152

Sage-grouse occupied habitats should be inventoried to identify the minimum necessary fencing required for livestock management. Fences determined to be unnecessary should be removed, especially in flat areas near leks, and remaining fences should be outfitted with reflectors or other visibility devices to reduce sage-grouse collisions. No new fences should be permitted in sage-grouse habitats. New fences should be precluded on all occupied habitats.

Response: See response to comment 9098. In addition, goal SPEC-SG-GOAL-02 states, "Continue to work with researchers, scientists, and partners to collect data sufficient to establish desired conditions for sage-grouse habitats in the Bodie, South Mono, and White Mountain Population Management Units specific to sagebrush species and ecological sites."

9132

A definition of tall structures that addresses local topography should be included such as the following: Tall structures - A wide array of infrastructure (for example, poles that support lights, telephone and electrical distribution, fences, communication towers, meteorological towers, high-tension transmission towers, and wind turbines) that have the potential to disrupt lekking or nesting birds by creating new perching/nesting opportunities and/or decreasing the use of an area. A determination as to whether something is considered a tall structure would be based on local conditions such as dominant surrounding vegetation or topography and in all cases all structures greater than a height of 8-feet tall.

Response: Standard SPEC-SG-STD-10 does not define tall structures, but instead generally refers to structures that are found to serve as predator perches. The component also includes direction for retrofitting existing powerlines and other utility structures during the permit renewal process.

9133

For tall structures, the standards must be improved and clarified to prohibit all new tall structures including powerlines from being authorized within 4 miles of active leks, and anti-perching devices must be required on existing structures within four miles

immediately, not waiting for the permit renewals over years or decades. Standards and guidelines should therefore be revised as follows: SPEC-SG- STD-10 "Tall structures or powerlines, which could serve as predator perches, will not be authorized within four miles of an active lek. Anti-perching devices shall be installed on any new structure or power line within four miles of an active lek. During the permit renewal process, existing tall structure or powerlines and other utility structures within four miles of active leks will be retro-fitted with perch-deterring devices." This standard could be further strengthened by adding the following language: existing powerlines and other utility structures within four miles of active leks will be re-located, buried, or if these approaches are infeasible, retro-fitted with perch-deterring devices.

Response: Inyo National Forest is committed to ongoing research and monitoring as described in the bi-state action plan (https://www.fws.gov/greatersagegrouse/Bi-State/Bi-State%20Action%20Plan.pdf). In the event a predator perch is identified as a contributing issue to the decline of the bi-state greater sage-grouse population, management can address the issue.

Three goals were added in the final plan, with goals SPEC-SG-GOAL-02 and 04 added to continue collaboration with research and other agencies, respectively, and goal SPEC-SG-GOAL-03 added to continue population and vegetation monitoring efforts.

9134

Guidelines 02 and 07 should be made Standards and required for all new projects; the very broad exception in 07 should also be removed. SPEC-SG- GDL 02 STD: Use existing roads to co-locate new power lines to reduce disturbance footprints (areas) and habitat fragmentation. SPEC-SG-GDL 07 STD: "No new structure or power line that could serve as predator perches shall be installed within four miles from an active lek, unless they are necessary to protect or improve habitat or for human health and safety."

Response: Guideline SPEC-SG-GDL-07 in the draft plan was removed. Standard SPEC-SG-STD-10 was edited to require anti-perching devices on any structure within 4 miles of active leks in suitable habitats.

Guideline SPEC-SG-GDL-02 from the draft is now SPEC-SG-GDL-01 in the final. The guideline allows for opportunities to minimize disturbance while working collaboratively for a solution that is realistic.

9147

Restrict development of all types (not just power lines and other structures that could serve as predator perches, p. 97, SPEC-SG-STD 10, p. 104, SPEC-SG-GDL 07) within four miles of sage-grouse leks (for example, SGNTT 2011: 22-24), including renewable energy development.

Response: Guideline SPEC-SG-GDL-07 in the draft plan was removed. Standard SPEC-SG-STD-10 was edited and includes the phrase “other utility structures,” which includes renewable energy development.

9162

Design criterion proposed for underground and perch deterrent may have a significant negative impact on the electric utility ratepayers while providing little or no benefit to sage-grouse. Given the lack of scientific data as it pertains to the demographic effect power lines may or may not have on sage-grouse, it is critical that design criteria are

commensurate with what can be quantified and adequately analyzed for each action. The U.S. Forest Service should consider removing provisions that lack demonstrated effectiveness and instead reference the Avian Power Line Interaction Committee (APLIC) Best Management Practices.

Response: Thank you for providing the specific Avian Power Line Interaction Committee Best Management Practices that can provide design measures for projects with power lines. We rely on best available science and incorporate best management practices when feasible.

The best available science on sage-grouse habitat and tall structures, including transmission lines is considered in the final environmental impact statement and species rationale (see chapter 3 of the final environmental impact statement, Revision Topic 2, "Terrestrial Ecosystem, "Sagebrush" section; and "Terrestrial At-risk Animals, Bi-state Sage-grouse" section; and Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest).

Mitigation for predator perches are specifically identified as a standard SPEC-SG-STD-10, providing lek buffer direction distances that are within the potential conservation buffer distances recommended in table 1 of Manier et al. 2014 paper. Guideline SPEC-SG-GDL-02 in the final forest plan directs where feasible, to bury utility lines to reduce overhead perches.

Inyo National Forest is committed to ongoing research and monitoring as described in the bi-state action plan. In the event a predator perch is identified as a contributing issue to the decline of the bi-state greater sage-grouse population, management can address the issue. Three goals were added in the final plan, with goals SPEC-SG-GOAL-02 and 04 added to continue collaboration with research and other agencies, respectively, and goal SPEC-SG-GOAL-03 added to continue population and vegetation monitoring efforts.

9163

The operations and maintenance of existing power lines and their associated access roads should not be considered a major impact to sage-grouse without evidence that they are contributing to a current threat and such operations and maintenance activities and power line facilities should be specifically exempt from an overly burdensome buffer distance to leks.

Response: The decision by the U.S. Fish and Wildlife Service that the bi-state sage grouse no longer needs protection under the Endangered Species Act was due in part to commitment of members of the bi-state local area working group and other partners, including the Forest Service to collaboratively implement the Bi-State Action Plan to further sage-grouse conservation. Standard SPEC-SG-STD does direct that during the permit renewal process, existing powerlines and other utility structures within 4 miles of active leks in suitable habitat will be retrofitted with perch-deterring devices. However, opportunities to research threats within the plan area are provided through goal SPEC-SG-GOAL-02.

9105

Science concerning fire frequency and impacts on sage brush and sage-grouse habitat is not adequately considered, especially in light of the inclusion of green strip fuel breaks in sage brush habitat.

Response: There is nothing in the draft or final forest plan about green strip fuel breaks in any ecosystem habitat type.

The best available science on fire frequency and impacts on sage brush and sage-grouse habitat is considered in the species rationale and in the final environmental impact statement (see chapter 3 of the final environmental impact statement, Revision Topic 2, “Terrestrial Ecosystem, “Sagebrush” section; and “Terrestrial At-risk Animals, Bi-state Sage-grouse” section; and Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest).

As a result of sensitivity of sagebrush ecosystems to fire, alternative B-modified adjusted the Strategic Wildfire Management Zones to consider the potential negative effects of fire to sagebrush. Some areas with sagebrush were reclassified to be in the General Wildfire Protection Zone where the fire risks of negative outcomes to highly valued resources are higher.

9136

Prohibit prescribed fire in sagebrush steppe with less than 12 inches annual precipitation (SGNTT 2011: 26, citing Connelly et al. 2000; Hagen et al. 2007; Beck et al. 2009) or areas with moderate or high potential for cheatgrass incursion (Miller et al. 2011).

Response: Forest plan direction regarding sagebrush and fire, and effects of fire, include desired conditions TERR-SAGE-DC-02 and 04 and TERR-SG-DC-06 and 07, goals TERR-SAGE-GOAL-01 and INV-FW-GOAL-04, standards SPEC-SG-STD-15 and INV-FW-STD-03, and guideline INV-FW-GDL-01.

Standard TERR-SAGE-DC-07 in particular directs that unwanted fire (more frequent, severe, or larger than the natural range of variation) in sage-grouse priority habitat is limited or prevented; and standard SPEC-SG-STD-15 directs that a resource advisor be consulted during wildfires in sagebrush to identify suitable sage-grouse habitat and to suggest opportunities for retaining and protecting sagebrush stands. When safe and feasible, protect highly valued suitable sage-grouse habitat ahead of burn operations using techniques such as targeted burning and providing direct protection.

9167

The draft environmental impact statement lacks emphasis on defending sagebrush habitat types against fire, and the word "sagebrush" appears only once in the Fire Management section of the draft environmental impact statement (p. 96), as a passing reference in the range of extant vegetation types, but sage-grouse habitats are listed as a relatively important resource to defend from fires (draft environmental impact statement, p. 92). Prioritization of protection of sagebrush habitats against fire through direct attack and ignition prevention in these areas should be incorporated into the revised Inyo Forest Plan. The Forest Service should add a commitment to extinguish fires in sagebrush habitats as a priority second only to protecting human life.

Response: The best available scientific information was used to develop a much more comprehensive affects analysis and persistence analysis (see chapter 3 of the final environmental impact statement, Revision Topic 2, “Terrestrial Ecosystem, Sagebrush” section; and “Terrestrial At-risk Animals, Bi-State Sage-grouse” sections; and appendix F, Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest; Persistence Analysis).

See response to comment 9136 for forest plan direction regarding sage-grouse habitat and fire.

9138

In areas of pinyon/juniper, avoid treating old-growth or persistent woodlands. In areas where sagebrush is prevalent or where cheatgrass is a concern, use mechanical methods rather than prescribed fire.

Response: See response to comment 9136. Prescribed fire is carefully analyzed to determine if desired conditions can be met and is one of many methods for treatments.

9139

The role of fire in the sagebrush ecosystem, and how (or if) it drives the patch dynamics of the system, is poorly understood at present. We are concerned that the widespread implementation of green strips across priority habitats will significantly fragment and degrade sage-grouse habitats, further exacerbating population declines, and in the process will have no net effect on fire frequency or extent; therefore, reconsider the use of green strip fuel breaks in sagebrush habitat.

Response: We are not implementing any type of green-strip fuel break; there is no mention of green-strip fuel break in the draft or final forest plan.

9127

The Forest Service should consider protecting sage-grouse habitat as zoological areas (Forest Service Manual 2372) to support long-term conservation of sage-grouse and other sagebrush-dependent species.

The agency could apply additional measures to conserve grouse beyond those prescribed for essential habitat, including prioritizing the areas for land acquisition and habitat restoration.

Response: The authority for administratively designating, preserving, and managing special areas within National Forests is found in the principal acts from 1897 to the present that authorize multiple-use management and in 36 CFR 294.1. The objective of administratively designating areas is to protect and manage for public use and enjoyment, special recreation areas with scenic, geological, botanical, zoological, paleontological, archaeological, or other special characteristics or unique values. A zoological area is a unit of land that contains animal specimens, animal groups, or animal communities that are significant because of their occurrence, habitat, location, life history, ecology, rarity, or other features. The Responsible Official considered other ways to manage for habitat for the at-risk bi-state greater sage grouse population via the desired conditions, objectives, goals, standards, guidelines, and potential management approaches outlined in chapter 2 of the final forest plan.

These plan components cover both the general sagebrush ecosystem type, and the specific suitable habitats for sage-grouse.

Statutory authorities govern land acquisition and disposal, and authorization and administration of special uses.

9135

The following guidelines should be adopted as standards to provide appropriate protection of sage-grouse: the Sage-grouse habitat guideline (SPEC-SG-GDL, p. 104) and forestwide guideline (INV-FW GDL, pp. 104-105).

Response: All plan components were reviewed between draft and final. A standard is a mandatory constraint on project and activity decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. A guideline is a constraint on project and activity decision making that allows for departure from its terms, so long as the purpose of the guideline is met.

Many guidelines from the draft became standards in the final. For sage-grouse, guideline SPEC-SG-GDL-01 from the draft was removed since stronger direction is already included in standards SPEC-SG-STD-06 and 07; guideline SPEC-SG-GDL-06 became SPEC-SG-STD-14; guideline SPEC-SG-GDL-07 in the draft plan was removed and SPEC-SG-STD-10 was strengthened to prevent development of structures that serve as predator perches.

For invasive species, two standards were added to the final forest plan based on draft plan guidelines. The remaining guidelines were appropriately edited to achieve desired constraint on project and activity decision making while allowing departure from its terms in order to meet intended objectives.

9137

Do not reduce sagebrush canopy cover to less than 15% (SGNTT 2011: 26, citing Connelly et al. 2000; Hagen et al. 2007).

Response: Ecological characteristics for sagebrush are described in the desired conditions (TERR-SAGE-DC 01 through 05). Desired condition FIRE-FW-DC-01 specifies that wildland fires burn with a range of intensity, severity and frequency that allow ecosystems to function in a healthy and sustainable manner; TERR-FW-DC-08 that fire occurs within an ecologically appropriate regime of frequency, extent, and severity; and TERR-FW-DC-09 that composition, density, structure, and condition of vegetation help reduce the threat of undesirable wildfires to local communities, ecosystems and scenic character. Goal SPEC-SG-GOAL-02 states, “Continue to work with researchers, scientists, and partners to collect data sufficient to establish desired conditions for sage-grouse habitats in the Bodie, South Mono, and White Mountain Population Management Units specific to sagebrush species and ecological sites.” At the project level, sagebrush treatments are carefully analyzed to determine if desired conditions can be met.

9140

Prohibit herbicide application within 1 mile of sage-grouse habitats during season of use; prohibit use of insecticides (Blus et al. 1989).

Response: Standard INV-FW-STD-03 directs the use an integrated pest management approach in the planning and implementation of all projects and activities. Integrated pest management is a process to solve pest problems while minimizing risks to people and the environment. It is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a

manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.

Other plan components include SPEC-SG-STD-03 to ensure that habitat restoration activities, vegetation treatments, or other authorized uses on the national forest, maintain or move toward vegetation desired conditions for sage-grouse. Short-term (1 to 10 year) impacts are allowed to deviate from these habitat standards, if the long-term (10 to 30 years) project objective is to achieve desired condition.

INV-FW-GOAL-02 is a goal to work with Tribes to determine priority areas for weed prevention and control, especially focused on traditional gathering areas that are threatened by weed infestations. Consult with Tribes before using pesticides or herbicides that may affect traditional gathering.

A potential management approach for the Pacific Crest National Scenic Trail outside of designated wilderness: timber harvest, prescribed burning, wildfire, herbicides, biological controls, and grazing may be used to manage vegetation.

9141

Limit motorized travel to designated routes trails in essential habitat (SGNTT 2011: 11). Implement appropriate seasonal restrictions on motorized travel to avoid disrupting sage-grouse during season of use (Holloran 2005; Aldridge et al. 2012). Do not authorize any off-highway vehicle events that pass within 4 miles of an active or pending lek.

Response: In 2009, we designated a legal system of roads and trails for motorized vehicles. This effort required many years of inventorying and analysis, and included extensive public involvement – including many members of the public who came together to help balance the needs for recreational opportunities and access while protecting critical resources and the unique character of these public lands. All vehicles must stay on these designated routes, unless visiting an area designated for open riding. Motorized use occurring outside of designated trails and roads is unauthorized use.

9142

Close existing trails and roads to achieve an open road and trail density not greater than 1 km/1km2 (.6 mi/.6 mi2) in essential habitat (Knick et al. 2013). Exclude new rights-of-way in essential habitat (SGNTT 2011: 12).Where valid existing rights-of-way are developed, restrict road construction within 1.9 miles of sage-grouse leks (Holloran 2005).

Response: See response to comment 9141. Travel management designated trails, routes and seasonal restrictions.

9144

Prohibit noise levels associated with any anthropogenic activity to not exceed 10 diameters above scientifically established natural ambient noise levels at the periphery of sage- grouse mating, foraging, nesting, brood-rearing and winter habitat during each season of use by sage-grouse (Patricelli et al. 2013; Patricelli et al. 2012 (report); SGNTT 2011: 64, citing Patricelli et al. 2010), including off-highway vehicle use.

Response: Noise levels in sage-grouse habitat are controlled by many plan components, including standards that establish a limiting operating period during the breeding (SPEC-SG-

STD-06) and nesting season (SPEC-SG-STD-07), and a designated legal system of roads and trails for motorized vehicles.

9143

The Inyo Draft Revised Plan contains no limit on the density of potential disturbance allowed in sage-grouse habitat, therefore, include a standard that restricts development to one site per section in essential habitat (SGNTT 2011: 21; Holloran 2005; Doherty et al. 2010; Doherty 2008), or an average of one site per section per analysis area where appropriate to support conservation goals (see, for example, Miles City Field Office Approved Resource Management Plan for Greater Sage-Grouse: 2-5, Table 2-4), and limit surface disturbance to less than 3 percent per section in essential habitat (SGNTT 2011: 7; Knick et al. 2013; see also Baruch-Mordo et al. 2013: 237, Figure B).

Response: Desired conditions for sagebrush and sage-grouse set the foundation for habitat conditions. Disturbance is limited by several standards and guidelines for sage-grouse. In particular, standard SPEC-SG-STD-05 requires site-specific project mitigation if needed to insure no net loss of habitat within the Inyo National Forest due to project disturbance.

9145

Manage riparian habitat and wetlands to meet properly functioning condition; manage wet meadows to maintain native species diversity and cover to support sage-grouse brood-rearing (Connelly et al. 2000).

Response: Direction to manage riparian habitat and wetlands to meet properly functioning condition is provided through desired conditions and standards. For example desired condition TERR-SAGE-DC-03 specifies grazed areas have or are trending toward satisfactory soils condition, functional hydrology and biotic integrity. Sagebrush ecosystems contain all key elements and conditions, including sagebrush regeneration and recruitment, ecosystem productivity, native perennial grass and forb cover, biological soil crusts, and symbiotic fungal associations.

The proposed utilization standards for the sagebrush/bunchgrass vegetation type by grazing system are provided in the final plan (see chapter 2, “Social and Economic Sustainability and Multiple Uses,” “Rangeland Vegetation Types” section).

Important standards include RANG-FW-STD-07 that limits annual livestock disturbances, and MA-RCA-STD-12 to assess the hydrologic function of riparian areas, meadows, fens, and other special aquatic features during rangeland management analysis.

9146

Adopt all recommendations of the National Technical Team (NTT 2011) with regard to mining in all its forms, including withdrawing from mineral entry, closing to future leasing for fluid minerals, coal, and leasable minerals, and closing to mineral materials sales all identified priority habitats.

Response: In the Mining and Minerals Policy Act of 1970, Congress declared that it is the continuing policy of the Federal Government, in the national interest, to foster and encourage private enterprise in (among other goals) the development of domestic mineral resources and the reclamation of mined land. This Federal policy obviously applies to National Forest System lands.

9148

Remove the clause "to the extent practicable" under Standard 04.

Response: This clause remains in the plan component because plan direction must be attainable.

9149

Add the word "native" before the word "plant" under Standard 09

Response: The plan has been revised as suggested

9150

During drought, remove livestock before range conditions deteriorate to the point of harming sage-grouse habitats. Since there is a lag in vegetation recovery following drought, ensure that post-drought management allows for vegetation recovery that meets sage-grouse needs.

Response: TERR-SAGE-DC-03 specifies grazed areas have or are trending toward satisfactory soils condition, functional hydrology and biotic integrity. Sagebrush ecosystems contain all key elements and conditions, including sagebrush regeneration and recruitment, ecosystem productivity, native perennial grass and forb cover, biological soil crusts, and symbiotic fungal associations. Utilization standards incorporate turn on and turn off dates as an option to meeting standards. The proposed utilization standards for the sagebrush/bunchgrass vegetation type by grazing system are provided in the final plan (see chapter 2, “Social and Economic Sustainability and Multiple Uses,” “Rangeland Vegetation Types” section).

9156

The preferred alternative includes the objective SPEC-SG-OBJ-01, which states, Within 10 years of the plan approval, 1 to 10 percent (1,500 to 14,900 acres) of sage-grouse habitat within and between population management units will be maintained, improved or restored to meet sage-grouse priority habitat desired conditions, including areas with conifer encroachment (i.e. Jeffrey pine and pinyon-juniper). Proposed Revised LRMP at 86. It is inadvisable to include the word "maintain" in this objective, because by extension, it implies that sage-grouse habitat will not be maintained across the remaining 293,100 to 306,500 acres of sagebrush habitat in the planning area. Another wording that would achieve the same intent would be to delete the words, "…be maintained, improved or restored to… ." We are sure that this is not the Forest Service's intended meaning, but wish to ensure that today's intentions are not misread in the future by ensuring that this direction is clearly and unambiguously worded.

Response: The sage-grouse objective has been changed, and the new SPEC-SG-OBJ-01 states within 10 years of the plan approval, at least 1,500 acres of sage-grouse habitat within and between population management units will be improved or restored to meet sage-grouse priority habitat desired conditions.

9157

A great many vegetation manipulation projects are being undertaken in the name of sage-grouse habitat improvement. The Forest Service appears to conflate "older and decadent" sagebrush with unhealthy sagebrush habitats, but the science does not support this theory and instead suggests that sagebrush removal or manipulation in sage-grouse breeding or wintering habitats should be avoided (Conservation

Objectives Team report (COT 2013: 44)); therefore, revise the Plans to be consistent with the science and avoid vegetation treatments in sage-grouse habitat.

Response: The final environmental impact statement cites recent comprehensive scientific literature reviews and management strategies directed at restoration of greater sage-grouse habitat (final environmental impact statement, chapter3, "Revision Topic 2: Wildlife, Fish, and Plants," "At-Risk Terrestrial Species" section). The plan components for sage-grouse habitat restoration broadly address the removal of encroaching conifers (chapter 2, "Terrestrial Ecosystems and Vegetation" section and "Animal and Plant Species" section) but do not prescribe specific methods or locations. Method and location of tree-removal in sage-grouse habitat would be further analyzed at the project level. At the forest plan level, only objective SPEC-SG-OBJ-01 in the final forest plan specifies that within 10 years of the plan approval, at least 1,500 acres of sage-grouse habitat within and between population management units will be improved or restored to meet sage-grouse priority habitat desired conditions.

9160

The plan and draft environmental impact statement rely on flawed assumptions concerning juniper habitat and should only recommend hand cutting of juniper based on careful, targeted, well-studied site-specific areas that have been clearly identified based on science as essential for sage-grouse restoration.

Response: The plan components for sage-grouse habitat restoration broadly address the removal of encroaching conifers (chapter 2, "Terrestrial Ecosystems and Vegetation" section and "Animal and Plant Species" section) but do not prescribe specific methods or locations. Method and location of tree-removal in sage-grouse habitat would be further analyzed at the project level. The final environmental impact statement cites recent comprehensive scientific literature reviews and management strategies directed at restoration of greater sage-grouse habitat (final environmental impact statement, chapter3, "Revision Topic 2: Wildlife, Fish, and Plants," "At-Risk Terrestrial Species" section).

9158

Strive for even greater aspirations, especially pertaining to objectives SPEC-SG-OBJ, INV-FW-OBJ, MA-RCA-OBJ, and RCA-MEAD-OBJ.

Response: An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives are based on reasonable foreseeable budgets. Between draft and final, some of these objectives were edited to reflect reasonable and foreseeable budgets.

9159

Within the Mono Basin, the Parker Creek Meadow population is the most at-risk of all the Bi-State greater sage-grouse populations. The Inyo should include language that specially directs the forest to work with Los Angeles Department of Water and Power in preserving and rehabilitating important wet meadow habitat.

Response: Los Angeles Department of Water and Power is a partner and SPEC-SG-GOAL-02 was added in the final plan to provide direction to continue to work with researchers, scientists, and partners to collect data sufficient to establish desired conditions for sage-grouse habitats in the Bodie, South Mono, and White Mountain Population Management Units specific to sagebrush species and ecological sites.

9178

Great gray owl should be an SCC on the Inyo National Forest because of known occurrences (CNDDB 2016 in Inyo County). The lack of known breeding as a reason to exclude it is inconsistent because the species is an SCC on the Sequoia National Forest even without known breeding locations. The GGO is currently a Regional Forester Sensitive Species on the Inyo National Forest. The reasons for not including it as an SCC are inconsistent with the Planning Rule for identification of an SCC.

Response: Upon reviewing the species information, it was discovered that while the great gray owl is not currently known to breed on the Inyo National Forest, there have been incidental sightings on the national forest and detections close to the Inyo. The known detections are described in the final environmental impact statement, chapter 3, Wildlife, Fish and Plants, At-risk Terrestrial Species section. Even if there are no breeding pairs, owls from the neighboring Sequoia and Sierra National Forests as well as Yosemite National Park, may use the Inyo plan area as dispersal or foraging habitat. The great gray owl was added as a species of conservation concern for the Inyo National Forest (see the Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest).

9171

The draft environmental impact statement and BE do not describe any negative impacts to great gray owl from the proposed plans; this is not grounded in science and is contrary to NEPA's "hard look" standard. The brief analysis in the draft environmental impact statement and BE neither informs the public nor the decision; therefore, it must be revised and made more specific and robust.

Response: The known detections, ecological conditions, and threats are more fully described in the final environmental impact statement, chapter 3, “Wildlife, Fish and Plants,” “At-risk Terrestrial Species” section, as well as the biological evaluation. See also response to 9178.

9173

Describe threats to great gray owl in more detail so that they can be addressed in plan components, including the threat of canopy cover reduction, logging, forestry practices and unmanaged grazing/plant cover reduction, meadow and riparian habitat loss.

Response: The known detections, ecological conditions, and threats are described in the final environmental impact statement, chapter 3, “Wildlife, Fish and Plants,” “At-risk Terrestrial Species” section. The threats include the fragmented nature of upper montane forests on the Inyo National Forest, coupled with declining and or small population numbers of the owl that may put the species at future risk, particularly given the Inyo National Forest’s location at the edge of the species range; vulnerability of meadow habitat to climate change and conifer encroachment; loss of heterogeneity in pine forests; increased risk to upper montane forest from natural disturbance such as uncharacteristic stand replacing fire, insect outbreaks and warming temperatures; and concern for disturbance from recreation, which is predicted to increase over time, also leads to concern for the species persistence. Plan components were developed to provide ecological conditions necessary to maintain a viable population of each species of conservation concern in the plan area. The final environmental impact statement includes the evaluation of how these course and fine filter plan components address and mitigate known threats to persistence.

9175

Great gray owl was not included in the analysis of other old forest associated species (i.e. fisher, spotted owl, and marten). The specific habitat associations were not addressed. Analyze the impacts of excluding GGO from the old forest grouping.

Response: During review of species considered for species of conservation concern, both the great gray owl and California spotted owl were added to the Regional Forester's list of species of conservation concern for the Inyo National Forest (see the Rationales for Animal Species Considered for Species of Conservation Concern, Inyo National Forest). The known detections, specific habitat associations, and threats are now described in the final environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Species" section. The factors considered most important in determining habitat use by breeding great gray owls are availability of nest sites and availability of suitable adjacent foraging habitat such as meadows. On the Inyo National Forest, these ecological conditions can be found in the mixed conifer and upper montane forest ecological zone, which consists of red fir forest, Jeffrey pine forest, and lodgepole pine, intermixed with meadows that form a patchy mosaic across the landscape. The analysis emphasizes the large open meadow association for great gray owl.

9176

The BE and draft environmental impact statement do not disclose the expected impact of removing the requirement to survey for great gray owls prior to ground disturbing activities. Surveys are required for great gray owl under both the 2001 and 2004 Sierra Nevada forest plan revisions. Surveys are also recommended by CDFW (Wu et al. 2016) and the U.S. Forest Service's own great gray survey protocol (2000).

Response: The 2012 Planning Rule states that neither standards nor guidelines should direct or compel processes, like surveys. For great gray owls, a species-specific potential management approach has been added to the final forest plan to "Conduct additional surveys using established protocols to follow up on reliable sightings of great gray owls" (chapter 2 of final forest plan, great owl potential management approach). This will help to determine if sightings represent breeding individuals or resident owls.

There are no known nesting sites on the Inyo National Forest and limited reported observations; however, the known detections, plan area ecological conditions, and threats are more fully described and assessed in the final environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Species" section, as well as the biological evaluation.

9181

The requirement for surveys is included as a potential management strategy. It should actually be a standard. This strategy requires following up on reliable sightings, but should also require surveys if habitat modification is proposed in unoccupied suitable habitat. This recommended approach is exactly what is required for spotted owl (see SPEC-CSO-GDL-01 & 02), and needs to be replicated for great gray owl.

Response: See responses to 9176 and 9178.

9179

Lack of species-targeted plan components is contrary to the planning rule's requirement and National Forest Management Act that forest plans provide for the ecological conditions necessary to maintain a viable population of each species. Specific standards or guidelines should be created to ensure that each of the

significant limiting ecological conditions necessary for species persistence are provided and the stressors acting on the species or its habitat are sufficiently mitigated, particularly for those stressors resulting from Forest Service management; therefore, include more specific plan components that are based on best available science to provide protections for the great grey owl.

Response: See response to comment 9178. There are no known nesting sites on the Inyo National Forest and limited reported observations.

Since there are no known nest sites and it is not suspected that the species is a regular breeder on the Inyo National Forest, no species-specific plan direction for great gray owl nesting was developed. However, if a nest site is discovered, guideline SPEC-FW-GDL-01 would protect the nest tree and important surrounding trees from removal. Standard SPEC-FW-STD-01 would provide for incorporating design features, mitigations, and project timing consideration into projects that may affect occupied habitats.

If nesting sites are discovered in the future, it could result in a need to evaluate if additional plan components should be added to the plan or if any existing plan components should be changed through a plan amendment. This would be informed by local knowledge of breeding site ecological needs that may be different from the primary scientific literature, which is from the forest conditions found on the west side of the Sierra Nevada range.

9184

The Desired Conditions lack a numeric description of the canopy cover, large tree density, and average tree size that are required for great gray owl breeding habitat

Response: See response to comment 9175 regarding ecosystem type associations for great gray owl. Desired conditions for each ecosystem type and old forest habitat, including numeric descriptions of canopy cover, tree density, snag density, and average tree size are found in chapter 2 of the final forest plan.

9185

There are no plan components to protect large trees or snags in PACs (or outside PACs), yet these are essential ecological conditions to the integrity of old forests that great gray owls depend upon (Winter 1986, Green 1995, Wu et al. 2016).

Response: Since there are no known nesting sites on the Inyo National Forest and limited reported observations, the requirements for great gray owl there are not known. It is unknown if the nesting habitats for great gray owl on the east-side of Sierra Nevada are the same as the west-side habitats, and this prevents defining what constitutes a protected activity center for the east-side habitats.

If nesting great gray owls are discovered, they will be managed by SPEC-FW-GDL-01 to protect nest trees and surrounding trees, and SPEC-FW-STD-01 to include design features, mitigations, or project timing (limited operating period) considerations into projects. If enough nesting habitat is later identified it would inform development of species-specific desired conditions and other plan components specific to the plan area, which would be added later through plan amendment.

9189

It is unclear how great gray owl protected activity centers (PACs) are delineated and at what point is a PAC no longer protected if the habitat changes due to climate change, fire or other environmental dynamics. Please clarify.

Response: See response to comment 9185.

9186

Develop plan components using management recommendations from Wu et al. (2016, p. 5-10) including management recommendations that limit grazing impacts in meadows.

Response: Since there are no known nesting sites on the Inyo National Forest and limited reported observations, direction for managing utilization in meadows is provided in the rangeland vegetation type standards in chapter 2 of the final forest plan. Also, there is direction to assess hydrologic function in MA-RCA-STD-13, and the Inyo National Forest has a forest supplement for evaluation of hydrologic function, including at the site-specific key grazing area. The latter protocols are incorporated into the Pacific Southwest Region's "Rangeland Analysis and Planning Guide" R5-EM-TP-004 (Inyo National Forest Supplement 1-2017 to USDA Forest Service Pacific Southwest Region Rangeland Analysis and Planning Guide R5-EM-TP-004). If enough nesting habitat is later identified for great gray owl, it would inform development of species-specific desired conditions and other plan components specific to the plan area, which would be added later through plan amendment.

9190

Black-backed woodpecker should be included as a SCC because there are many threats to its continued persistence and the lack of listing it is not based on BASI; therefore, include it as a SCC and develop forest plan components, including standards and guidelines, to provide the necessary ecological conditions to maintain viability.

Response: Between draft and final environmental impact statement, the rationales for each species were updated and made more comprehensive and from that the Regional Forester revised the list of species of conservation concern (see Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest). The process included updating rank information from NatureServe, California natural diversity database and California rare plant rank (plants only); more thorough investigations of species occurrence in the plan area; consideration of all species on other federal and state status listings (for example, Forest Service sensitive species status); improved descriptions of threats to persistence; and more comprehensive best available science.

On the Inyo National Forest, there have been 322 reports of 552 individual black-backed woodpeckers within the National Forest boundary, or 354 reports of 593 individuals including and within 5 miles of the National Forest boundary. For the California Natural Diversity Database, there are only 3 records within the Inyo National Forest boundary. All of these sightings are within California and none are within the Nevada portion of the Inyo National Forest plan area.

Based on several factors, including the black-backed woodpecker's range across the Sierra Nevada and Cascades, no detectable decline in California, no limiting habitat factors within the plan area, the potential for continued wildfires and burned habitat creation, and the sheer number of detections within the Inyo National Forest plan area, the best available scientific information

about the black-backed woodpecker does not indicate substantial concern about the species' capability to persist over the long term in the plan area.

Plan direction in the animal and plant section in chapter 2 of the forest plan is designed to maintain the diversity of plant and animal communities and support the persistence of all native species, within the plan area, subject to the extent of Forest Service authority and the inherent capability of the plan area.

9191

The draft forest plans and draft environmental impact statement do not acknowledge that climate change will likely change the forest type to something that the black-backed woodpecker does not currently reside in.

Response: As described in response 9190, the rationales for each species were updated and made more comprehensive between draft and final environmental impact statement (see Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest). In the rationale for black-backed woodpecker, climate change is considered a potential threat to the persistence of black-backed woodpeckers. However, indications from the best available science of species distribution models, as well as other factors to rank the vulnerability of birds in California, convey the black-backed woodpecker had a climate vulnerability of the lowest priority level; analysis of Sierra Nevada bird species vulnerability to climate change found that future vulnerability of the black-backed woodpecker was "presumed stable" under climate scenarios considered.

9192

Draft plans and draft environmental impact statement do not use BASI regarding the habitat for black-backed woodpecker; that the habitat is targeted for logging post-fire removing snags that are used by the woodpecker resulting in a loss in population.

Response: The rationale for black-backed woodpecker includes a review of scientific studies on post-fire snap removal treatments. Post-fire snag removal treatments commonly referred to as "salvage treatments" have been identified as a potential threat to the persistence of black-backed woodpeckers; however, treatments can vary substantially in their duration and intensity on the environment. For a literature review of impacts of post-fire snag removal on black-backed woodpecker, see the black-backed woodpecker rationale in Rationales for Plant Species Considered for Species of Conservation Concern, Inyo National Forest.

Desired conditions for each ecosystem type and old forest habitat, including numeric descriptions of canopy cover, tree density, snag density, and average tree size are found in chapter 2 of the final forest plan. Also, a potential management approach for terrestrial ecosystems and vegetation includes retaining areas of dense, variable, and connected patches of snags across a range of snag sizes.

9193

Draft environmental impact statement and plans do not acknowledge the ecological role of fire, including high-severity fire, and the importance of its role in creating habitat for the black-backed woodpecker; i.e., snags. Preserve all suitable habitat and only

permit felling of dead trees on roads maintained for public use or within 100 feet of structures.

Response: The ecological effects of fire of different severity classes are thoroughly presented in the Agents of Change (Fire Trends) and Ecological Integrity sections of the final environmental impact statement and the Fire Climate, Fire Ecology, Terrestrial Vegetation Resilience, and Terrestrial Vegetation Ecology Supplemental Reports. Additional modeling information on wildfire effects to natural and other resources is presented in the Southern Sierra Wildlife Risk Assessment Report.

See response to comment 7311 for a discussion of plan components relevant to complex early seral forest habitat, including desired conditions and guidelines related to snag retention and complex early seral habitat protection.

9195

Lack of species-targeted plan components is contrary to the planning rule's requirement and National Forest Management Act that forest plans provide for the ecological conditions necessary to maintain a viable population of each species; therefore, include more specific plan components that are based on best available science to provide protections for the marten.

Response: See response to comment 9000 for a general discussion of species-specific plan components.

The draft forest plan included three species-specific desired conditions, a guideline and a potential management approach for Sierra marten that were designed to complement additional ecosystem plan components.

The final plan retained the three desired conditions, strengthened the guideline, and converted the potential management approach to a guideline. Guideline SPEC-SM-GDL-01 was strengthened by changing the wording from “retain some overtopping and multi-storied canopy conditions” to “retain overtopping and multi-storied canopy conditions”. In converting the draft plan potential management approach to SPEC-SM-GDL-02, it was strengthened to clarify that projects would be designed “…include non-linear edges that decrease susceptibility to predation.”

9196

There are two "potential management approaches" that should be considered for inclusion as guidelines: Maintain or increase understory heterogeneity in marten denning habitat to promote "hiding cover" such as shrub patches, coarse woody debris, and slash piles following vegetation treatments. Design projects to have non-linear edges. Avoid or remediate habitat modifications that unnaturally increase marten susceptibility to predation (Sierra National Forest draft plan, p. 87). Define habitat modification that would increase marten susceptibility to predation.

Response: Guideline SPEC-SM-GDL-02 was added to the Inyo final plan and incorporates both potential management approaches mentioned in the comment. Habitat modification that is thought to increase marten susceptibility to predation is the creation of linear roads and trails that allow predators to more easily penetrate into denser forests

9197

Consider including the following as standards:

- **Limiting disturbance during denning using a limited operating period.**
- **Retaining habitat conditions that support denning.**
- **Limiting vegetation management to reducing surface and ladder fuels to reduce fire risk.**
- **Restoration treatments retain all large trees.**

Response: Marten dens are difficult to locate and martens change dens frequently making denning direction difficult to manage. Direction for marten habitat in the final forest plan is included in several plan components, including standard SPEC-FW-STD-01 that directs design features, mitigation, and project timing considerations are incorporated into projects that may affect occupied habitat for at-risk species; guideline SPECI-FW-GDL-01 that includes direction to retain den trees and surrounding forest; and two guidelines specific for marten, SPEC-SM-GDL-01 and 02, that specifically address retaining, maintaining, or increasing components of core habitat and denning habitat.

9198

We suggest the follow changes to draft plan components (pgs. 99, 104):

SPEC-SM-GDL-01- Maintain or increase understory heterogeneity in marten denning habitat to promote "hiding cover" such as shrub patches, coarse woody debris, and slash piles following vegetation treatments. Design projects to have non-linear edges.

SPEC-SM-GDL-02- Avoid or remediate habitat modifications that unnaturally increase marten susceptibility to predation.

SPEC-SM-STD-01- Within marten core habitat, establish a limited operating period during denning periods.

SPEC-SM-STD-02- Within marten core habitat, limit vegetation management to reducing surface and ladder fuels to reduce fire risk.

SPEC-SM-STD-03- Where feasible, prohibit the removal of red fir and lodgepole over 24" DBH within marten core habitat.

Response: See responses to 9196 and 9197. In addition, SPEC-SM-GDL-01 directs to retain overtopping and multi-storied canopy conditions in marten core habitat, in addition to retention of other core habitat features.

9199

As a whole, plan components for marten provide no clear protections for forests with dense canopy, abundant large trees, large snags, and abundant down wood that are required for marten persistence. Plan components to reduce threats should be included in the revised plans.

Response: Guidelines SPEC-SM-GDL-01 and 02 in the final forest plan provide direction in marten core habitat and denning habitat, respectively, and focus on retaining, maintaining and/or increasing the appropriate features in those habitats. Also see responses to 9000, 9200, and 9201.

9200

Any projects to improve fire resilience should be focused on removing surface and ladder fuels and making little change to dense canopy conditions.

Response: On the Inyo National Forest, the majority of Sierra marten habitat occurs in locations such as designated wilderness where commercial timber harvest would not be proposed or in inventoried roadless areas where it would be unlikely due to lack of access (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Species" section).

If projects were proposed within Sierra marten habitat, two desired conditions would apply. SPEC-SM-DC-02 and 03 describe providing vegetation trending towards vegetation desired conditions to be more resilience and sustainable over time and providing foraging, denning, and resting habitat and habitat that supports movement throughout the marten's range. In addition a guideline provides for retaining overtopping and multi-storied conditions for marten habitat when designing projects (SPEC-SM-GDL-01) (final forest plan, chapter 2, "Animal and Plant Species," "Sierra Marten" section)

9201

The plan does not ensure marten viability and will be in contravention of the planning rule because of the increase in logging, especially the fuel treatment logging in high elevations.

Response: See response to comment 9200. On the Inyo National Forest, the timber harvest program is limited in scale, and most of the tree cutting is related to fuel wood collection with smaller amounts of harvest related to fuels reduction around communities and other similar assets; and some thinning for ecological restoration of forests and shrublands. Within marten core habitat, guideline SPEC-SM-GDL-01 requires retention of "…overtopping and multi-storied canopy conditions, including some shade-tolerant understory trees such as firs, especially in drainages, swales and canyon bottoms and on north and east-facing slopes. Retain a patchy mosaic of shrubs and understory vegetation, separated by more open areas, to reduce fuel continuity, increase habitat heterogeneity, support prey, and provide hiding cover, with a goal of 10 to 20 percent shrub cover at the home range scale." In addition, guideline SPEC-SM-GDL-02 requires maintaining or increasing understory heterogeneity in marten denning habitat to promote hiding cover from things like coarse woody debris following vegetation treatments (final plan, chapter 2, "Animal and Plant Species," "Sierra Marten" section).

9202

The draft plan includes an area called "marten core habitat area" or "marten habitat core area," but these areas are not clearly defined. The conditions that reflect the "use" of the areas by marten should be the basis of desired habitat conditions for marten.

Response: The final forest plan has been corrected to refer to marten habitat core areas and the marten core habitat within them. These are defined in the Glossary as: "Marten habitat core areas are large contiguous areas of marten habitat within which martens can establish home ranges and comingle as a population. Marten core habitat is the forested habitat within the marten habitat core areas" (final forest plan, "Glossary").

The marten habitat core areas are delineated by the scientific analysis done by Spencer, W. and H. Rustigian-Romsos. 2012. Decision-Support Maps and Recommendations for Conserving Rare Carnivores in the Interior Mountains of California. Unpublished report produced by Conservation Biology Institute.

9203

A quantitative analysis to evaluate the impacts of the treatments allowed by the plans is currently lacking in the draft environmental impact statement and should be included to evaluate impacts on martens.

Evaluate the impacts of the treatments allowed by the plans on canopy, large trees, large snags, and wood as these are important aspects of marten habitat.

Response: The forest plan provides a programmatic framework to guide future project decisions, thus it is not possible to provide a quantitative analysis of treatments because it is not known where and when projects may be proposed that would overlap with marten habitats. The final environmental impact statement does evaluate the extent that overarching plan components for vegetation and species-specific direction for Sierra marten would provide for the ecological conditions that marten need as well as any key risk factors that would affect the ability of marten to persist within the national forest over time (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "At-risk Terrestrial Species" section).

On the Inyo National Forest, most of the habitat for Sierra marten is in the higher elevation Sierra Nevada montane ecological zone and a large proportion is with designated wilderness and in inventoried roadless areas. Thus, the primary means of improving forest habitat conditions will be in changing direction that emphasizing restoring fire to the landscape through better management of wildfires.

9206

Widespread over-snow vehicle trails and compaction could work synergistically with climate change and compromise marten winter habitat by compromising or removing deep snow barriers which keep coyotes out of the winter range for these species. Climate change and reduced snowpack should be included as part of the environmental baseline and inform the analysis of direct, indirect, and cumulative impacts.

Response: The final environmental impact statement and final forest plan contain a winter recreation opportunity spectrum map that describes the opportunities and settings for winter motorized uses on the Inyo National Forest. The authorization of over snow vehicle use will be determined when we complete Travel Management, subpart C (36 CFR 212) after the plan revision process. During that site-specific evaluation, the presence of over-snow vehicle use in marten habitat will be evaluated. Nonmotorized recreation is addressed in the recreation opportunity spectrum classes, which are required by the 2012 Planning Rule (chapter 2, "Sustainable Recreation") and appendix A. These nonmotorized settings would be primitive and semi-primitive nonmotorized classes. Lands outside of wilderness would also have limited motorized access (road density and development scale) in inventoried roadless areas that are in semi-primitive motorized class.

The final environmental impact statement (chapter 3 and animal rationales for species considered for species of conservation concern, Inyo National Forest; see supporting documents) include information and analysis of marten habitat in the plan area. Although the majority of marten habitat is within designated wilderness, there is an area of marten habitat northwest of Mammoth Lakes that is outside of designated wilderness.

The effects of climate change and reduced snow pack are also included in analysis.

9207

The draft biological evaluation does not document the rationale for viability determinations for Regional Forester sensitive species. For sensitive species where there is no longer a concern for persistence in the plan area, the biological evaluation should serve the purpose of validating that conclusion, in addition to evaluating the effects of plan components on viability. Since this is the last time that viability for these species would be evaluated, we attach great importance to the integrity of the scientific analysis included in these documents.

Response: The rationale for determining if a Regional Forester sensitive species met the criteria to become a species of conservation concern was strengthened in separate rationale documents for animals and for plants available in the planning record. This information is briefly summarized in the final environmental impact statement in chapter 3 in the section on "Wildlife, Fish and Plants." See also response to 9059.

9208

RFSS needs to be cleaned up as to why it is identified as SCC. Any changes in policy need to be explained. Why one document does not sync with the others in regards to species with viability concerns. Would like to see a complete explanation as well a comparison between the criteria used to determine viability then and now for RFSS that were not designated SCC.

Response: See response to comment 9207.

The current requirement for the regional forester to identify a list of sensitive species for the Pacific Southwest Region is different from the 2012 Planning Rule requirement for the Regional Forester to identify a list of species of conservation concern for the Inyo National Forest. While the goal of both lists is to prevent species from being federally listed as threatened or endangered, they have different criteria for determining which species to include. The criteria and process used to evaluate if species should be identified as species of conservation concern were shared with the public in July and December 2015. A new section has been added to the final environmental impact statement to better explain the relationship between the two lists of species (final environmental impact statement, chapter 3, "Wildlife, Fish and Plants," "Background" section).

9210

The existing forest plans include standards that manage deer and reduce conflicts, but the proposed plans do not include these standards. The forest plans should include similar standards, and if not, the draft environmental impact statement should evaluate the impact of not having standards on the health of the deer herds and the effect this could have on hunting, wildlife viewing and other recreational pursuits.

Response: The draft forest plan included one goal and one guideline specific to deer that are similar to the current forest plan. SPEC-FW-GOAL-02 states "Collaborate with the California Department of Fish and Wildlife for assessing potential disturbance factors to deer during the planning phase of vegetation management projects." SPEC-FW-GDL-02 provides guidance on limiting disturbance from vegetation treatment projects in deer holding areas and key winter range areas during critical time periods.

In the final forest plan, the goal was expanded to also collaborate with the California Department of Fish and Wildlife on habitat management opportunities when planning vegetation management

projects. SPEC-FW-GDL-02 was unchanged in the final forest plan (final plan, chapter 2, animal and plant species, "Forestwide Components for Animal and Plant Species" section).

A desired condition was developed in the draft forest plan and continued unchanged in the final forest plan to address the value of hunting and fishing opportunities. SPEC-FW-DC-05 states: "The Inyo National Forest provides for high quality hunting and fishing opportunities. Habitat for non-native fish and game species is managed in locations and ways that do not pose substantial risk to native species, while still contributing to economies of local communities."

9213

The plans lack sufficient standards and guides to provide for persistence of plants at risk from threats and project activities. There needs to be more detailed standards and guides.

Response: Plan components relevant to persistence of at-risk plants, including desired conditions, standards, guidelines, and goals, were added or improved to the "Special Habitats" and "Animal and Plant Species" sections in the final forest plan.

The potential management approaches describe the intent of the Inyo.

In chapter 3 of the final environmental impact statement, the consequences of implementing the final plan are analyzed in the "At-risk Plant Species" section; in addition, the consequences to the ecological integrity of the ecosystems upon which at-risk plant species depend are analyzed in the "Terrestrial Ecosystems" and "Aquatic and Riparian Ecosystems."

9214

Add the Ramshaw Meadows sand verbena Conservation Agreement to the Inyo National Forest LMP Goals (MA-RCA-GOAL; p. 63)

Response: Direction for implementing conservation strategies or agreements is specifically specified in guideline SPEC-FS-GDL-04, and indirectly provided in goal SPEC-FW-GOAL. The Ramshaw Meadows abronia, *Abronia alpina*, conservation agreement is specifically included in appendix B, Proposed and Possible Actions, animal and plant species, Ramshaw Meadows abronia; and appendix G, Existing Resource Plans.

9215

In the draft environmental impact statement, 43 percent of the SCC plants have grazing as a threat, yet little is done to address this in the draft plans; therefore, add standards that require mandatory surveys and remedial actions specific to at-risk plants.

Response: In the 2013 forest assessment and 2016 draft environmental impact statement, grazing is included as a generalized threat (for example, based on threats listed in NatureServe) for species of conservation concern and not specific to the plan area. The threats for each species of conservation concern in chapter 3 of the final environmental impact statement include observed threats where known, otherwise general threats, making it difficult to know an exact percentage of at-risk plants definitively affected by grazing. .

Since forest plans are strategic and do not compel any specific action, authorize projects or activities, or guarantee specific results, there are no standards to require mandatory surveys and remedial actions specific to at-risk plants. However, plan components relevant to persistence of at-risk plants, including desired conditions, standards, guidelines, and goals, were added to the

"Special Habitats" and "Animal and Plant Species" sections in the final forest plan. We also show are intent with the potential management approaches added to these sections, some of which address surveys and management priorities.

9216

The only way to understand the ecological needs, and to assess trends in the conditions of at-risk plants is to survey for them regularly and this is not required in the draft plans; therefore, the plans need to be revised to include more specific standards and guides that require mandatory survey and monitoring, and remedial action requirements where conditions are determined to be in decline. A revised standard must include direction like, "appropriately timed pre-project floristic surveys will be performed to determine whether at-risk plants are present, and if present, mitigation requirements to avoid and/or minimize deleterious effects of the project will be implemented."

Response: While project-level surveys could be used to identify the presence of at-risk plant species at a particular project site, and thus avoid or minimize adverse impacts, the provisions under section219.9 of the final planning rule are focused on maintaining or restoring the ecological conditions necessary to maintain the diversity of plant and animal communities and support the persistence of native species in the plan area. Because it is not practicable to monitor all plant species across the plan area, the forest plan monitoring program will assess the status of select ecosystem components. These select ecosystem components are presented in chapter 4 and are intended to cover a range of habitats where at-risk species occur. Also see response to comment 9215.

9217

***Astragalus kentrophyta var. ungulatus* (spiny milk-vetch) in California is known from a single population, on caliche-covered clay mounds in the eastern Mono Basin. In 2015 and 2016, individuals of this plant were documented on BLM land immediately adjacent to Inyo National Forest; Arnold Tiehm, who first collected this variety in California stated he collected the plants from an area on Inyo National Forest –administrated land. Fewer than 100 plants were counted in 2016. Protections for this rare plant are lacking in the plans; therefore, this habitat should be identified as a special habitat for management and the species included in list of SCCs.**

Response: The description of "Special Habitats" has been refined in the final forest plan and the final environmental impact statement to include the caliche-covered clay soil mound habitat required for *Astragalus kentrophyta* spp. (see "Special Habitat" introduction in chapter 2 of the final forest plan). Caliche-covered clay soil habitat is also included in the "Special Habitat" section of appendix B – Proposed and Possible Actions of the final plan. *Astragalus kentrophyta var. ungulatus* will be considered for species of conservation concern listing when there is a known location in the plan area

9219

The standard related to special habitats management (Special Habitats (TERR-SH-STD) 01) is insufficient to provide protection of the resources at the project level. The requirement to "consider" special habitats is ambiguous and does not ensure adequate

habitat is provided; therefore, this standard must be revised with strengthened language.

Response: The "Special Habitat" standard (TERR-SH-STD-01) in chapter 2 of the final plan is strengthened: "At the project scale, evaluate and incorporate maintenance and enhancement needs for special habitats into project design and implementation."

9220

Plan component (TERR-SH-DC-03) appears only in the draft Sierra National Forest Plan. What is the rationale for not including 3 in either the Inyo or Sequoia plan components? To our knowledge, the same conditions addressed by 3 occur in all three forests and therefore the Inyo and Sequoia draft plans must be revised to include this component as well. Further, the sustainability of pollinators is central to the viability of all rare plant species, and should be a desired condition throughout special habitats

Response: TERR-SH-DC-03 has been added to the Inyo National Forest final plan; the component was edited from the Sierra National Forest version to be more inclusive of all special habitats. It is located in chapter 2 of the final plan.

9221

Management of special habitats is currently inadequate to provide protection, and would be more effective if these habitats are identified by type or species, and additional, specific monitoring, management, and restoration guidelines provided in the forest plan. Specific types of special habitats to consider on the Inyo National Forest are caliche-covered clay soil mounds, Mono Basin pumice flats, unglaciated alpine meadows and barrens and stabilized dunes north of Mono Lake.

Response: The introduction to the "Special Habitats" section now includes a list of special habitats occurring in the plan area. In addition, plan direction has been enhanced to include two goals and a standard.

We also expanded management intent of special habitats by adding a potential management approach and editing the special habitats section of appendix B – Proposed and Possible Actions to be more inclusive of all special habitats.

9222

Management objective should include having special habitat locations in GIS.

Response: Goal TERR-SH-GOAL-02 was added to the special habitats section to include the location of special habitats in the corporate geographic information system.

9223

Draft environmental impact statement table 96 lists off-highway vehicle recreation as a known threat to numerous species of conservation; however, off-highway vehicle recreation is confined to designated trails and trail tread is a highly unlikely place for plants to grow, and trail treads are excluded from being considered for habitat impacts, since they are not suitable habitat for anything; therefore, off-highway vehicle recreation should be removed from the list of known threats to species of conservation concern.

Response: Terminology has been updated to describe unauthorized off-highway vehicle use that is occurring outside of designated trails and roads; specifically, observed occurring in special habitats, affecting at-risk plants that do not occur on trails and roads.

9224

If the draft environmental impact statement continues to cite off-highway vehicle trail tread as having negative impacts on species, then the draft environmental impact statement must also disclose that non-motorized trail tread has an identical negative impacts on species because plants do not know if trail tread is an off-highway vehicle trail or a hiking trail. The impacts from non-motorized trail tread would be far greater than motorized trails, since there are far more miles and therefore acres of non-motorized trail tread. Given this information, the draft environmental impact statement is mistaken when it states that "recommendation of wilderness that would protect some species of conservation concern plants" (draft environmental impact statement volume I, p. 459).

Response: See response to comment 9223.

9225

The analysis for at-risk plants does not adequately analyze the persistence of each species and simply states that persistence has been provided for by simply stating that it is addressed by at least one plan component; however, the components are over-arching statements of desired conditions, and vaguely worded design criteria (with the exception of some management area guidelines for meadows and some fens) that do not truly provide for persistence; therefore, the analysis needs to analyze the impacts of the proposed plans on species persistence and the plans need to be made more robust to ensure persistence.

Response: The at-risk plant effects analysis in the final environmental impact statement was completed by examining ecological conditions and threats to individual at-risk species, and also by examining the collective distribution patterns of at-risk flora within the planning area, by biogeographic region and by ecosystem type. This approach assists in understanding the broad relationship between a programmatic land management plan and the desired conditions identified for at-risk species in the planning area. Desired conditions for at-risk animal and plant species emphasize habitat that supports self-sustaining populations, precluding the need for listing, and improving conditions for these species (SPEC-FW-DC-01 through 04).

The final plan was made more robust by adding components relevant to persistence of at-risk plants in the “Special Habitats” and “Animal and Plant Species” sections in the final forest plan, including desired conditions, standards, guidelines, and goals.

9226

The draft environmental impact statement analysis on New Zealand mud snail failed to note additional BASI (Herbst et al 2008) related to streams that are more susceptible to invasion by the species, which could guide management; therefore, the analysis and Plans need to be revised to take this into account.

Response: Thank you for identifying this research. It has been recognized in chapter 3 of the final environmental impact statement in the At-risk Aquatic Species section. Under consequences common to alternatives B, B-modified, C, and D, we recognize that higher specific conductance can be used as a tool to identify areas at higher risk.

The plan direction for invasive species has been clarified and strengthened to emphasize a new forest plan goal has been added (INV-FW-GOAL-01) to coordinate and cooperate with local, State and Federal agencies regarding management and control of invasive species. Developing

effective approaches to assessing risk across ownership boundaries is essential to an effective invasive species program.

9227

Forest Service lands are suffering from weed invasion which is inadequately addressed in the proposed Plans; therefore, the agency must revise the Plans to provide management of lands as an important stronghold for native terrestrial species. .

Response: The draft plan included many components addressing prevention and treatment of invasive species. For the final plan, these were re-examined and several clarified and strengthened and a few added.

The amount of nonnative invasive plant species eliminated in the objective (INV-FW-OBJ-01) was increased from 300 acres to 800 acres. A new objective was added (INV-FW-OBJ-02) “Within 10 years of plan approval, take action to eradicate at least three species of high priority nonnative invasive plants from the Inyo National Forest.”

Two draft plan guidelines were converted to standards: Draft plan INV-FW-GDL-04 became final plan INV-FW-STD-02; and draft plan INV-FW-GDL-01 became final plan INV-FW-STD-03.

The two draft plan potential management approaches were covered to Goals in the final plan (INV-FW-GOAL-02 and INV-FW-GOAL-03) because the success of implementing them depends upon coordinating with others outside of the Forest Service.

A new goal was created to work with others to develop a nonnative annual grass management strategy (INV-FW-GOAL-04) and a new potential management approach was created to develop a forestwide treatment prioritization strategy for invasive plant species (final plan, Chap 2. “Invasive Species” section).

The forest plan also includes direction designed to maintain native plant communities and the diversity of native species under the “Animal and Plant Species” Desired Conditions section (for example, SPEC-FW-DC-01, 02 and 04) and for some species like Bi-State sage-grouse (SPEC-SG-DC-06). In addition, the forest plan includes components for terrestrial ecosystems forest-wide and 10 specific terrestrial ecosystem types that occur within the plan area. Many of these components support the conservation of native plants and communities by providing for the integrity of ecosystem function and diversity, for example, by providing for “ecosystem diversity” (TERR-FW-DC-01); utilizing fire as a "key ecological process in fire-adapted ecosystems" that "enhances ecosystem heterogeneity and habitat and species diversity" (TERR-FW-DC-08); maintaining "vegetation [that] is a mosaic of diverse ecological types with native shrubs and grasses" (TERR-XER-DC-01); and "increasing diversity by promoting hardwoods, pines, and native plant species" (TERR-FW-GDL-01).

9228

The Plans should enable passive restoration of lands "at risk" of weed invasion and/or suffering degradation or facing further losses of native species to buffer these lands from adverse impacts of climate change effects.

Response: The plans include broad objectives to maintain ecological conditions forest-wide, within specific vegetation types and management areas, and for plant and animal species. The definition of “maintain” in the glossary includes the following statement: “Depending upon the circumstance, ecological conditions may be maintained by active or passive management or

both." In addition, there are numerous plan components that emphasize ecosystem and lands resilience to climate change (for example, WTR-FW-DC-01; TERR-FW-DC-02; TERR-SAGE-DC-02; TERR-PINY-DC-01; TERR-XER-DC-02; TERR-MONT-DC-01; INV-FW-GOAL-03).

9229

The sites of more intensive livestock disturbance (and often associated motorized activity) serve as epicenters for initial weed invasion and then subsequent outward spread and these impacts are inadequately addressed in the Plans; therefore, enable active restoration of these areas, including the removal of harmful livestock facilities (and often linked roads) or other developments that may be damaging important, sensitive and imperiled species habitats, species populations, and watershed and other ecological processes, and removal of harmful fences and water developments (wells, pipelines, troughs, water haul sites - no water hauling can be allowed), salt/supplement sites, sheep camp sites, and associated roading or other disturbance.

Response: We recognize that areas of extensive or high impact ground disturbance are more susceptible to weed invasion (see Inyo National Forest Assessment, chapter 3, "Invasive Species"). Desired conditions for rangelands are that landscapes support native vegetation, sustain biological diversity and ecosystem integrity (RANG-FW-DC-01); grazed areas have biotic integrity (RANG-FW-DC-02); and desired rangeland vegetation types are maintained including diverse plant functional groups, species richness and diversity, and structure and condition of plant communities (RANG-FW-DC-03). Desired conditions for invasive species are that they are controlled, eradicated, or prevented (INV-FW-DC-01) and that the area affected and new introductions are minimized (INV-FW-DC-02). Site-specific projects would be designed to meet the intent of these desired conditions, such as treating weeds at livestock associated sites or infrastructure.

The forest plan also includes a goal to consider impacts to wildlife, fisheries, and watershed condition when designing rangeland improvements and structures (RANG-FW-GOAL-03), a standard to locate livestock infrastructure outside of sage-grouse leks (SPEC-SG-STD-13), and a guideline to include invasive species control and prevention measures in all permits including livestock grazing (INV-FW-GDL-04). These plan components should serve to reduce the ecological impact of livestock activities and infrastructure.

See response to comment 9227 for the development of a goal (INV-FW-GOAL-04 and potential management approach to develop a forestwide treatment prioritization strategy.

9230

Under "Wilderness Guidelines" for each planning unit, we request that you establish strict visitor use standards for preventing the introduction and spread of invasive and nonnative vegetation species in wilderness using the Wilderness Stewardship Plan for Sequoia and Kings Canyon National Parks as an example. Types of feed and bedding allowed should be restricted with the following language: "California or Nevada certified weedfree forage (baled or loose hay, hay cubes, or straw bedding) are required when using hay products as supplemental forage or bedding in front country zones. Feed carried into wilderness is limited to commercially processed pellets, rolled grains, or fermented hay (for example, "Chaffhaye"). These products have a high level of mechanical milling, heat treatment, and/or anaerobic fermentation that result in much

lower seed viability. Baled or loose hay and compressed hay cubes, which have little to no processing, are not allowed in wilderness."

Response: The draft plan guideline (INV-FW-GDL-04) which requires that "hay, straw and other crop-related forage or mulch products used for animal feed or bedding … should be certified … as being weed free …" has been renumbered in the final forest plan to INV-FW-GDL-02 (final plan, chapter 2, "Invasive Species" section). It has been clarified to add weed-free certification by the State of Nevada to the list and to allow certain case-by-case exemptions when certified weed-free material is not available when discussed with the Inyo National Forest invasive species coordinator. This forestwide requirement for weed-free animal feed or bedding would apply to recreational uses in wilderness areas.

We did not require feed carried into wilderness to be limited to commercially processed pellets, rolled grains, or fermented hay because we felt that certified weed-free hay or products derived from such would reduce the risk of weed introduction to reasonably low levels while still providing options for packstock users.

Weed control requirements for commercial packstock permittees on the Inyo National Forest are also governed by the 2006 final environmental impact statement and 2007 Record of Decision for Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance. These requirements include a weed prevention and control plan included in the Annual Operating Plan for each permittee, and a recommendation that certified weed-free forage be used (to be required as certified weed-free hay/straw becomes available). New 20-year permits were issued in 2008. As permits are issued, amended, or reissued, guideline INV-FW-GDL-04 (was draft plan GDL-05), requires weed control and prevention measures to be included, as necessary (final plan, chapter 2, "Invasive Species" section).

9231

The forest plans currently lack consistency with Park Service management direction to prevent invasive and non-native vegetation spread within shared wilderness areas; therefore, please consider revising the plan direction related to areas of shared wilderness management, including the Reds Meadow Valley/Fish Creek Place. We request that you establish strict visitor use standards for preventing the introduction and spread of invasive and nonnative vegetation in the shared Wilderness designation

Response: A new goal (INV-FW-GOAL-01) has been added to the forest plan to "coordinate and cooperate with local, state and federal agencies to manage and control invasive and non-native species" (final plan, chapter 2, "Invasive Species" section). This goal expresses our intent to work with the National Park Service on best practices that can be implemented or harmonized across ownership boundaries to manage and educate visitors in order to manage and control invasive species.

A potential management strategy includes providing and updating interpretive signage, exhibits, publications, and programs using a variety of media (final plan, chapter, "Volunteers, Interpretation, Partnerships, and Stewardship" section). This strategy represents a future opportunity to educate the public about their role in preventing the spread of invasive non-native species across the Inyo National Forest. A good example can be found on signs at off-highway vehicle staging areas and trailheads across the Inyo National Forest which explain the risk of transporting weed seeds on vehicle tires.

9232

The plans currently lack management direction to actively restore areas that have had exotic seedings in the past; therefore, include plan direction that requires: inter-seeding of sagebrush and forbs, removal of exotics with techniques minimizing use of herbicides, and active restoration of cheatgrass/weed infestation areas without loss of existing shrub cover to the maximum extent possible.

Response: A new desired condition (TERR-SAGE-DC-05) was added to the sagebrush vegetation type to address nonnative annual grasses within sagebrush to express the desire that native species persist with adequate structural and functional diversity including shrubs, perennial bunchgrasses, and forbs (final plan, chapter 2, Sagebrush section). A final plan guideline for sage-grouse (SPEC-SG-GDL-04 – was GDL-05 in draft plan) addresses seeding or transplanting sagebrush to restore sagebrush cover and to improve habitat connectivity for sage-grouse (final plan, chapter 2, "Bi-State Sage-grouse" section).

The draft plan guideline (INV-FW-GDL-06) to use the non-chemical method when comparable in cost or feasibility to chemical methods was dropped in the final plan because it did not consider the effectiveness of treatments and the determination of appropriate treatment methods is implicit in draft plan guideline INV-FW-GDL-01 that requires use of an integrated pest management approach when planning and implementing projects. This draft plan guideline was made a standard in the final plan (INV-FW-STD-03) (final plan, chapter 2, "Invasive Species" section).

A new potential management approach was developed for Invasive Species to develop a forestwide treatment prioritization strategy for invasive plant species considering ecological impact, extent and location of populations, and effectiveness of available treatment methods (final plan, chapter 2, "Invasive Species" section). This would allow managers to more holistically address existing and emerging invasive species threats based upon risks of spread and potential impacts and the effectiveness of treatments.

See response to comment 9236.

9233

Grazing livestock are well-known vectors for the colonization and dispersal of invasive, non-native, or noxious species colonization on public lands, and livestock promote the spread and colonization of alien plants, which can increase fire frequencies (Belsky and Gelbard, 2000). These impacts are currently inadequately addressed in the Plans; therefore, revise the plans to address livestock grazing impacts on weed spread.

Response: Desired conditions for rangelands are that landscapes support native vegetation, sustain biological diversity and ecosystem integrity (RANG-FW-DC-01); grazed areas have biotic integrity (RANG-FW-DC-02); and desired rangeland vegetation types are maintained including diverse plant functional groups, species richness and diversity, and structure and condition of plant communities (RANG-FW-DC-03). Desired conditions for invasive species are that they are controlled, eradicated, or prevented (INV-FW-DC-01) and that the area affected and new introductions are minimized (INV-FW-DC-02). The forest plan also includes a guideline to evaluate burned areas for rest from livestock grazing for recovery of desired vegetation conditions and related biophysical processes (RANG-FW-GDL-01) as well as a guideline to include invasive species control and prevention measures in all permits including livestock grazing (INV-FW-GDL-04). These guidelines should serve to reduce the ecological impact of weeds associated with livestock grazing.

9234

The desire to expand grazing, which spreads invasive cheatgrass, and the concern about increasing needs for fire suppression, are at odds with one another, as shows in the study by Pellant that indicates increased fire risk from increased cheatgrass. Please consider this study when revising the plans to ensure restoration of native ecosystems.

Response: There is no expansion of grazing proposed in the forest plan. The article provided (Pellant 1996) was reviewed. More recent literature by Pellant and others (for example, Chambers et al 2014, McIver et al 2014, and Miller et al 2014a) was used to develop components in the final plan (TERR-XER-STD 01, Potential Management Approaches for Sagebrush and Pinyon-Juniper, SPEC-SG-STD 01 and 03) and in the final environmental impact statement (chapter 3, Revision Topic 2, Terrestrial Ecosystems, "Environmental Consequences to Vegetation Composition, Structure, and Resilience" section).

9235

Fences facilitate the spread of exotic and invasive plants, and increase mortality of sage-grouse by increasing predation rates through increased perches for raptors and habitat fragmentation, and these impacts are not adequately addressed in the plans and the analysis in the draft environmental impact statement.

Response: In preparing the draft forest plan, the risk of predation to sage-grouse was considered and two standards specific to predator perches and fences were included, SPEC-SG-STD 10 and 11 (draft forest plan, chapter 4, animal and plant species, "Sage-grouse Habitat" section). These two standards remain in the final forest plan (final forest plan, chapter 2, animal and plant species, "Bi-State Sage-grouse" section).

In addition, the analysis in the final environmental impact statement was improved to better disclose which plan components provide for ecological conditions that ensure the persistence of species (final environmental impact statement, chapter 3, Wildlife, Fish and Plants, "At-risk Terrestrial Species" section; appendix F, Persistence Analysis).

See responses to 9114 and 9098 for sage grouse.

9236

The plans should provide for active restoration of areas invaded by intermediate wheatgrass/seeded exotics, cheatgrass or other weedy species, but they currently lack that direction. Further weed expansion must be prevented by not undertaking mowing, hacking, herbicide thinning, Lawson aerating, or any other destruction of native sagebrush or salt desert shrub vegetation. Any treatment of forested vegetation must minimize disturbance effects to protect from weed expansion and habitat loss for other species. Tebuthiuroin treatment enhances cheatgrass spread and is highly non-selective, as does burning which also kills non-target vegetation and may accidentally burn up vast swathes of habitat. Use of heavy mechanical equipment displaces soils causing weeds and watershed problems and has many other adverse impacts. Selective handcutting in areas planned carefully to enhance sagebrush species must be the treatment of choice if any treatment is needed.

Response: See response to comment 9232.

The forest plan emphasizes the maintenance and restoration of native plant communities and terrestrial ecosystems as a component of desired conditions (such as, SPEC-FW-DC-01, -02; INV-FW-DC-01, -02; RANG-FW-DC-01), while recognizing that restoration may be "active" or

"passive." Forest plan objectives include restoring species composition (TERR-FW-OBJ-01), restoring sage-grouse habitat (SPEC-SG-OBJ-01), taking action to eliminate non-native invasive plant species (INV-FW-OBJ-01, -02), and restoring composition and conditions of riparian areas and meadows (MA-RCA-OBJ-01, RCA-MEAD-OBJ-01). Restoration of areas with exotic seeded species such as intermediate wheatgrass could be included in projects designed to meet these objectives or other desired conditions.

There are numerous guidelines that would be incorporated at the project level which would potentially contribute to restoration of areas with historic seedings, such as seeding or transplanting sagebrush (SPEC-SG-GDL-04), using an integrated pest management approach to plan and implement invasive species treatments (INV-FW-STD-03), and using native species for future seeding projects (INV-FW-GDL-03).

The plan includes several components which would guide the future use of herbicides for invasive species and vegetation management. See response to comment 9252.

9237

A full analysis and mapping of all areas where past "treatments" have taken place where weeds are likely to occur is currently lacking in the Plans and draft environmental impact statement and should be provided. It should take into consideration all projects including those undertaken many decades ago where the agency overtly stated "treatments" were for livestock forage.

Response: The forest plan provides the overarching desired conditions, objectives, approaches, and design criteria that would guide the intent and design of future projects. A discussion of the existing condition of non-native invasive species and noxious weeds can be found in the Inyo National Forest Assessment in chapter 3: Assessing System Drivers and Stressors, under the "Invasive Species" section.

A new goal was created to work with others to develop a nonnative annual grass management strategy (INV-FW-GOAL-04) and a complimentary new potential management approach was created to "Develop a forestwide treatment prioritization strategy for invasive plant species considering ecological impact, extent and location of populations, and effectiveness of available treatment methods" (final plan, chapter 2, "Invasive Species" section).

In August 2016, we initiated the environmental analysis process for the proposed Invasive Plant Management Project, which would identify and prioritize treatment of weeds forestwide.

9238

Livestock grazing leads to cheatgrass invasion, and overgrazing eliminates native bunchgrasses and degrades biological soil crusts, both of which represent the ecosystem's natural defenses against this invasive weed (Reisner et al. 2013), but the proposed plans lack guidance preventing this. The LRMP revision must implement measures that will reverse this trend in order to minimize the spread of cheatgrass and provide adequate hiding cover for sage-grouse. Livestock forage removal limits need to be set in the plans, allowing no more than 25 percent of the available forage to be consumed each year. Current utilization standards proposed for the forest plan are inconsistent with this threshold and would lead to negative impacts.

Response: The final plan includes Forestwide Rangeland Standards (final plan, chapter 2, "Rangeland Livestock Grazing" section) to sustain and improve rangeland ecosystems, and

provide management criteria so that rangelands are not "over-grazed." In addition, we reviewed the rangeland assessment procedures (methodology) and updated the procedures with best available scientific information. These procedures have been added as a forest-specific supplement to the R5 Rangeland Analysis and Planning Guide (R5-EM-TP-004).

The desired conditions for sagebrush ecosystems are that they are resilient to disturbances including grazing (TERR-SAGE-DC-02) and that grazed areas contain key elements and conditions including sagebrush recruitment, ecosystem productivity, perennial grass cover, soil crusts, and symbiotic fungal associations (TERR-SAGE-DC-03). There are several standards in the final forest plan which address habitat conditions for sage-grouse and minimization of invasive species spread and/or maintenance of native vegetation (SPEC-SG-STD-01, -03, -04). There are also guidelines for invasive species which would be incorporated into range allotment management and address invasive species control: using an Invasive Plant Management approach to plan and implement treatments (INV-FW-STD-03), incorporating prevention and control measures into ongoing management and maintenance activities and projects (INV-FW-GDL-01), and incorporating weed control and prevention measures into permits including livestock grazing (INV-FW-GDL-04). The Rangeland Standards and utilization levels in the final plan (chapter 2, "Rangeland Livestock Grazing" section) were developed to balance providing a forage base for livestock and providing a healthy ecosystem for native plant and animal species.

9240

The plans should have guidance requiring seeding to use local native plant ecotype seeds and seedlings.

Response: In the final plan, the guideline INV-FW-GDL-03 (was INV-FW-GDL-04 in the draft plan) has been revised to emphasize the preference for the use of native, genetically appropriate plant materials for the site. The guideline does recognize that in some cases there may not be locally sourced seeds so it applies to the extent feasible.

9241

While the U.S. Forest Service recommends cleaning equipment and vehicles before moving from one water body to another, the U.S. Forest Service should develop standard guidelines for cleaning equipment and vehicles and allow the public to comment prior to finalizing design criteria standards. The U.S. Forest Service should also consider not requiring cleaning prior to leaving all areas, especially at locations where invasive species are not present. The U.S. Forest Service should provide information for known noxious weed infestations to assist with determining where equipment and vehicle cleaning should take place and to help avoid moving from areas with weeds to pristine areas.

Response: INV-FW-STD-01 would require (not recommend) that equipment and vehicles be cleaned after working in water bodies with known aquatic invasive species and prior to moving to other water bodies. This is an essential strategy to minimize the spread of aquatic invasive species and is discussed in the final environmental impact statement in chapter 3 in the Aquatic Species At-Risk section. The public has had the opportunity to comment on this design criteria during the current planning process. INV-FW-GDL-01 addresses minimizing invasive species spread during projects by incorporating prevention measures. One of those measures would likely be to clean equipment and vehicles that have been working in known infestations prior to moving to uninfested areas. Any specific management actions by the Inyo National Forest personnel would be consistent with the intent of forest plan direction and would be further analyzed at the project

level, when the public would have further chance to review and comment. Site-specific information on known locations of weeds is gathered and provided during project-planning and would be made available during project implementation.

9242

The effect of pack stock on spreading invasive plant species needs to be addressed in the plans with a management plan to reduce infestations at pack stations and along pack trails, and consider utilizing partnerships to complete weed control work in these areas.

Response: Weed control requirements for commercial packstock permittees on the Inyo National Forest are governed by the 2006 final environmental impact statement and 2007 ROD for Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance. These requirements include a weed prevention and control plan included in the Annual Operating Plan for each permittee, and a recommendation that certified weed-free forage be used (to be required as certified weed-free hay/straw becomes available). New 20-year permits were issued in 2008. INV-FW-GDL-04 directs managers to include weed control and prevention measures when issuing, amending, or re-issuing all permits, including for packstock operators. The final plan also includes a strengthened component that requires the use of certified weed-free forage and mulch (INV-FW-GDL-02) with exceptions possible only in consultation with the Inyo National Forest Invasive Species Coordinator. Partnerships are always an option to accomplish invasive plant treatments (for example, INV-FW-GOAL-01); at permitted operations, control and prevention of invasive species are ultimately the responsibility of the permittee.

9243

INV-FW-GDL-2, needs to be revised. "When feasible, projects should include measures to provide invasive species-free gravel, fill, topsoil and mulch. When invasive species-free gravel, fill, topsoil, and mulch are not available; include follow-up inspections as needed and specified in regional or national strategies." Often, gravel, fill, topsoil, and mulch cannot be certified as weed free in the quantities or specification necessary to support utility-scale projects.

Response: This guideline has been renumbered to INV-FW-GDL-01 and revised to remove mulch. We recognizes that there may be situations when weed-free gravel, fill or topsoil are not available, hence the inclusion of the language “when feasible." Currently the Nevada Department of Agriculture has a Weed-Free Gravel Certification program, but gravel certification availability in California (by county agricultural commissioners) is not always available. In some cases, Forest Service personnel are able to inspect and approve material sources for use. It is also expected that the availability of certified weed-free gravel will increase in the future as the impacts of invasive species introductions are increasingly recognized and demand increases. Mulch is addressed under a separate guideline (INV-FW-GDL-02) where the use of certified weed-free mulch is required but deviations may be approved in consultation with the Inyo National Forest invasive species coordinator.

9244

INV-FW-GDL-4 needs to be revised. "Weed-free plant material should be selected for all seeding and mulching projects to restore natural species composition and ecosystem function to the disturbed area. Plant or seed materials should be used that are appropriate to the site, capable of becoming established, and not listed on the California Invasive Plant Council (Cal-IPC) noxious weed list." This would define clearly

that plant material to be used to restore function to disturbed areas would not include noxious weeds.

Response: A new Standard has been added to the plan (INV-FW-STD-02) to select weed-free plant material, which would include seeds and container plants, for restoration and revegetation projects. In addition, the use of noxious weeds is prohibited under U.S. Forest Service national policy in FSM 2070.3, 6: "Do not use noxious weeds for revegetation, rehabilitation, or restoration projects." The Cal-IPC list of noxious weeds would be one of many sources we would consider when determining if material is considered weed-free.

INV-FW-GDL-03 has been revised to emphasize the preference for the use of native, genetically appropriate plant materials.

9245

INV-FW-GDL-6 needs to be revised. Non-chemical methods should be used when the integrated pest management approach determines that chemical combined with one or more other form of management, cost, or feasibility, and effectiveness will be comparable in the control of non-native invasive species. Early detection and rapid response have been determined by Cal-IPC to be the most important elements to control non-native invasive species. To help ensure that the most effective rapid response control methods are utilized, including an effectiveness element into the comparison is essential to meeting the intent of the U.S. Forest Service invasive species mitigation goals.

Response: The draft plan guideline INV-FW-GDL-06 has been deleted from the final plan. The draft plan guideline INV-FW-GDL-01 was converted to standard INV-FW-STD-03 and requires the Inyo National Forest personnel to "Use an integrated pest management approach in the planning and implementation of all projects and activities." The integrated pest management approach to determine treatment methods addresses thoughtful evaluation of treatment effectiveness with other tradeoffs, including cost, feasibility, and risks to human health and the environment. This results in the use of the most appropriate method for a given species and site utilizing an early detection and rapid response approach. See also response to 9232.

9246

There are more effective objectives that could be set rather than setting a number of acres treat, such as a target number of invasive species eradicated from each national forest or ranger district over 10 years, which would then be reported in the forest plan monitoring report for each forest. We suggest setting a target of eradicating 10 invasive species from each national forest each decade.

Response: A new objective has been added to the forest plan (INV-FW-OBJ-02) to eradicate at least 3 high priority nonnative invasive species from the national forest within 10 years of plan approval. This number represents a portion of the invasive species on the Inyo that are potentially eradicable considering species ecology, number and location of populations, and availability of effective treatment options.

9247

Prevention of invasive species establishment and spread (when they already occur on the forest) is critical, and the proposed plans lack a prevention strategy; therefore, please include an additional objective to implement prevention strategies.

Response: The final plan includes specific prevention strategies such as requiring equipment cleaning after working in water bodies with aquatic invasive species (INV-FW-STD-01); requiring use of weed-free seed (INV-FW-STD-02); incorporating prevention measures into projects and permits (INV-FW-GDL-01, -04); and using weed-free gravel and mulch materials to the extent feasible (INV-FW-GDL-01, -02). In addition, control and eradication of existing infestations (INV-FW-OBJ-01, -02) reduces the risk of further spread to new locations. In addition, Forest Service Manual chapter 2900 includes objectives, policy, and responsibilities for the management of invasive species, which include implementing prevention strategies into forest service activities, programs, and projects.

9248

Developing and implementing effective management and prevention strategies requires detailed information on which species occur in which areas, which is currently lacking from the proposed plans. We suggest an additional objective addressing the need for maintaining comprehensive mapping efforts.

Response: Mapping of invasive species locations is an essential part of an invasive species management program. An additional objective addressing invasive species mapping efforts has not been included in the final plan because Forest Service Manual chapter 2900 includes objectives, policy, and responsibilities for the management of invasive species, which include inventory and survey as part of an early detection and rapid response approach, developing and utilizing site-based and species-specific risk assessments to prioritize management, and complying with Forest Service performance accountability system requirements for invasive species management (which includes population mapping and inventory and treatment activities be recorded in the spatial database of record - Natural Resource Manager, Natural Resource Information System, Threatened, Endangered, and Sensitive Plants, and Invasive Species (NRM-NRIS-TESP/IS)), and identify and record the site-specific spatial extent of invasive species.

See response to comment 9255.

9249

The plans should have language that requires notification of the Tribes for future invasive weed projects with specifications that recommend manual eradication if at all possible in areas of cultural sensitivity where Tribal members gather medicinal and plant resources, and if herbicide use is the only option, the areas should be clearly marked so that people can avoid collecting from treated areas, and consult with tribal governments if the area is determined to be a potential gathering site. The Tribe also desires the Forest Service to monitor for the persistence of residual chemicals in treated environments, if pesticides are used.

Response: Coordination with Tribes for land management activities is addressed in final plan components (for example, TRIB-FW-GOAL-01; INV-FW-GOAL-01) and is required under the National Historic Preservation Act, NEPA, and several Executive Orders at the project-level. A potential management approach in the draft plan that involved consulting with Tribes before using pesticides or herbicides that may affect traditional gathering was converted to a goal in the final plan, INV-FW-GOAL-02.

Coordination, notification, signage, and pesticide monitoring requirements would be developed and implemented at the project-level. INV-FW-STD-03 states "Use an Integrated pest management approach in the planning and implementation of all projects and activities." The integrated pest management approach addresses thoughtful evaluation of treatment effectiveness with other factors, including cost, feasibility, and risks to human health and the environment.

9251

The draft Inyo National Forest Plan identifies a plan objective of "Within 10 years of approval take action to eliminate non-native species from 300 acres." (Inyo National Forest Plan, p. 85). Instead, what is needed is to develop and implement a strategy for identifying and controlling non-native invasive plants over the long term. This strategy should include: 1. Establish criteria to select the non-native invasive plant species present, or likely to be found there, that pose a significant threat to natural resources. 2. Using the criteria, compile a list of weeds to target for control or eradication (flexible to accommodate new infestations). 3. Compile existing data from online and other sources, and conduct field surveys to determine the distribution and abundance of target weeds. 4. Map (using GIS) the distribution of target weed infestations. 5. Develop strategies to control target weeds in areas where control is practical and there is clear environmental benefit, for example, areas of high species diversity such as meadows, fragile habitats such as alpine rock barrens, important rare plant habitat areas, and Special Habitats. 6. Implement control strategies. 7. Follow up with monitoring to determine the effectiveness of the control strategies, and modify as needed to achieve best results over the long term. 8. Use volunteers (for example, Friends of the Inyo, Sierra Club, CNPS etc.) to assist with mapping, control efforts, and follow up monitoring.

Response: Based upon comments received, we re-evaluated the existing amount of activities to eliminate non-native invasive plants that is accomplished and considered what additional opportunities exist and increased the amount of acres in the Plan Objective for Invasive Species. INV-FW-OBJ-01 now reads "Within 10 years of plan approval, take action to eliminate non-native invasive plant species on at least 800 acres" (final forest plan, chapter 2, "Invasive Species" section).

In addition, a new plan objective (INV-FW-OBJ-02) was added to address eradication of high priority nonnative invasive plants. The forest plan does not prescribe the specific method or process to identify the specific high priority species but adds a potential management approach to "Develop a forest-wide treatment prioritization strategy for invasive plant species, considering ecological impact, extent and location of populations, and effectiveness of available treatment methods" (final forest plan, chapter 2, "Invasive Species" section). See also response to 9246.

9252

The Forest Service should prohibit the use of herbicides to control invasive species. With the development of partnerships, the Forest Service should approach the management of invasive species via mechanical means.

Response: The use of herbicides is one of many methods that might be considered when determining the best method to use to control invasive species. A guideline in the draft plan (INV-FW-GDL-01) was converted to a standard (INV-FW-STD-03) in the final plan and requires use of an integrated pest management approach. Under an integrated pest management approach, where treatment using hand or mechanical means instead of herbicides is a reasonable and feasible option, it will be considered when site-specific projects are designed. Where partnerships can be

used effectively, they will also be considered in designing projects. Since there may be cases where the use of herbicides is the best method to meet a site-specific project purpose and need, the forest plan allows it to be considered. The final determination on the use of herbicides would be made considering the site-specific conditions and consequences at the project level.

9253

Given the depth and breadth of Cheatgrass invasion on the Inyo, the forest should add an objective to create a Cheatgrass management plan. Objectives should include post-treatment plans and post-project monitoring and restoration that would be incorporated in every Forest action.

Response: In the final forest plan a new goal was created to address the development of a management strategy for non-native annual grasses, which would include cheatgrass. INV-FW-GOAL-04 states "Develop a non-native annual grass management strategy in collaboration with other Federal agencies, research organizations, Tribes, and other partners."

9254

The mitigation of increased invasive species from management activities needs to be addressed in the plans, including ways to fund the work. All approved project work done (on the Inyo), 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 project proponents to be responsible for the cost of invasive species management.

Response: The final plan includes specific prevention strategies such as requiring equipment cleaning after working in water bodies with aquatic invasive species (INV-FW-STD-01); requiring use of weed-free seed and plant material (INV-FW-STD-02); incorporating prevention measures into projects and permits (INV-FW-GDL-04, INV-FW-GDL-05); and using weed-free gravel and mulch materials to the extent feasible (INV-FW-GDL-01, INV-FW-GDL-03). In addition, control and eradication of existing infestations (INV-FW-OBJ-01, INV-FW-OBJ-02) reduces the risk of further spread to new locations.

Identifying funding sources for accomplishing work, including developing cost- recovery strategies, is not a part of the forest planning process. The purpose and intent of the forest plan is outlined in chapter 1- Introduction, which states that forest plans "…do not specify particular methods that must always be used and do not require resources be allocated."

9255

The analysis of existing conditions and risks associated with invasive plants is lacking in the draft environmental impact statement. Without an adequate description of existing conditions, it is difficult to assess how reasonable the plan objectives, standards, guidelines, and proposed and possible actions are with respect to invasive plant management.

Response: See response to comment 9256 regarding how data is used to inform the existing condition across different resource areas. A discussion of the existing condition of non-native invasive species and noxious weeds can be found in the Inyo National Forest Assessment.

The forest plan revision recognizes that a more comprehensive and strategic approach to managing invasive species is needed. In the final plan, two new goals were developed. INV-FW-

GOAL-04 describes the intent to coordinate and cooperate with others to develop a nonnative annual grass management strategy and INV-FW-GOAL-01 describes an intent to work with others to manage and control invasive and nonnative species (final plan, chapter 2, “Invasive Species” section). To support this, a potential management approach was developed to “Develop a forestwide treatment prioritization strategy for invasive plant species considering ecological impact, extent and location of populations, and effectiveness of available treatment methods” which depends upon knowing the current distribution of invasive plants.

9256

The online Calflora Database (calflora.org) and CalWeedMapper (calweedmapper.org) both catalog invasive plant distribution on these forests and should inform the description of the existing conditions.

Response: We annually submit data to the California Natural Diversity Data Base (CNDDB) and Nevada Natural Heritage Program (NNHP), and to CalWeedMapper, which feed data into Calflora. These sources of distribution data are used regularly to inform project-level planning and forest-level invasive species program management. A discussion of the existing condition of invasive plant species on the Inyo National Forest can be found in chapter 3 of the Inyo National Forest Assessment, and the discussion of invasive plants and associated risks is integrated in the final environmental impact statement in the chapter 3 sections on “Terrestrial Vegetation Ecology,” “Terrestrial Ecosystem Processes and Functions,” “Wildlife, Fish and Plants,” “Wilderness,” and “Tribal Relations and Uses.”

9257

Please provide informative maps showing pastures, range improvements, and underlying vegetation (and changes over time), cheatgrass/knapweed/weed occurrence and various percent cover, areas of intact and/or better condition microbiotic crusts, and other information necessary to understand ecological conditions, areas of highly erodible soils, areas of limited "forage production", and the quality and quantity of habitat available for native wildlife species. Please provide mapping and information on all "treatments" of vegetation communities, and any post-fire rehab or any other seeding or treatment of sagebrush and forested sites that may have occurred.

Response: Forest-wide maps depicting existing vegetation types are provided in Appendix A and in the Inyo National Forest Assessment. A map showing the extent of cheatgrass and red brome presence on the Inyo can be found in the final environmental impact statement titled “Occurrences of cheatgrass in vegetation plots, Inyo National Forest” (final environmental impact statement, chapter 3, Terrestrial Ecosystems section, Affected Environment, Sagebrush section). This data is from regional ecology plots and represents the best available forest-wide mapping of cheatgrass/brome distribution.

A discussion of existing livestock grazing use and rangeland condition are found on pages 129-132 of the Inyo National Forest Assessment. Several maps of wildlife habitat are provided in the Inyo National Forest Assessment including California Wildlife Habitat Relationships (CWHR) types (page 30), CWHR density (canopy cover; page 31), habitat connectivity (page 38), and watershed aquatic integrity scores (page 46).

Maps of highly erodible soils, site-specific locations of range infrastructure, more detailed maps of individual species distribution or habitat, and maps of past treatments or actions, are not included in the final environmental impact statement, because the programmatic analysis for the forest plan revision did not depend on such maps. In addition, we do not currently have a

forestwide map of microbiotic crusts. As needed, this information would be considered as part of future project-level environmental analysis.

9258

The Forest Service appears to imply that prescribed fire can be a useful tool for ecological renewal in sagebrush habitats (draft environmental impact statement at 165) and that it can and should be used to combat cheatgrass invasion in certain circumstances (draft environmental impact statement at 166). Both of these assertions are false as these approaches are counterproductive. Fire tends to foster the expansion of cheatgrass, which is a superior post-fire invader; therefore, revise the draft environmental impact statement using best available science on fire effects on cheatgrass.

Response: The analysis in the draft environmental impact statement recognized the challenges of cheatgrass invasion (draft environmental impact statement, pages 165-166). This analysis was clarified and strengthened in the final environmental impact statement (chapter 3, "Terrestrial Vegetation Ecology," "Mechanical and Prescribed Fire Treatments: Eastside Shrublands and Woodlands Zone" section). It is recognized that prescribed fire is particularly effective at restoring ecosystem composition and mitigating cheatgrass invasion within sagebrush ecosystems with relatively high ecological integrity in the early to mid-phase of pinyon or juniper expansion. However, the application of prescribed fire can exacerbate cheatgrass invasion in sagebrush ecosystems lacking sufficient pre-fire cover or seed banks of residual native grasses and forbs such as might occur in the late-phase of pinyon or juniper invasion.

Recognizing the sensitivity of sagebrush ecosystems to fire, alternative B-modified adjusted the Strategic Wildfire Management Zones to consider the potential negative effects of fire to sagebrush. Some areas with sagebrush were reclassified to be in the General Wildfire Protection Zone where the fire risks of negative outcomes to highly valued resources are higher.

Wilderness, including Evaluation Process

8000

Designation of new wilderness areas restricts recreation opportunities and management options (for example, mechanical management, grazing and other multiple uses) and has potential ecological and social sustainability impacts, as well as impacts on visitation to the forests; therefore, it is important these effects are analyzed.

Response: As part of revising the Inyo forest plan, we identified and evaluated lands that may be suitable for inclusion in the National Wilderness Preservation System. This is a requirement of the 2012 Planning Rule (36 CFR 219.7(c)(2)(v)). We are not designating any wilderness areas through this process; only Congress can take that action.

The final environmental impact statement preferred alternative (alternative B-modified) recommends 37,029 acres of wilderness. The effects of this recommendation to other resources can be found in final environmental impact statement, chapter 3, Recommended Wilderness and final environmental impact statement, chapter 3, Social Conditions and Economic Conditions.

8001

Management options for fire (prescribed fire, mechanical treatments) and response to tree mortality are limited by wilderness designation.

Response: Under section 4(d)(1) of the 1964 Wilderness Act, the Secretary of Agriculture retains the ability to take measures "as may be necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable." Because of this language, a wide range of options remain available as management responses to fire and tree mortality in wilderness. Prescribed fire has been used in wilderness areas, when the benefits to overall wilderness character are improved and documented in a minimum requirements analysis decision.

8002

Ecological restoration and the goal of increasing the pace and scale of restoration would be hampered by wilderness designation.

Response: See response to comment comment 8000. In addition, the decision being made in this planning process only recommends wilderness and does not designate. The final environmental impact statement analysis has been revised from the draft environmental impact statement to include an assessment of trade-offs with lands being recommended for wilderness. (See final environmental impact statement chapter 3, Recommended Wilderness). The final environmental impact statement also includes a more robust analysis of an alternative considered but eliminated from detailed study that looks at all areas identified by the public as recommended additions and includes the effect on management activities (chapter 2, Alternatives Considered but Eliminated from Detailed Study; Alternative Eliminated 2).

8003

Wilderness designation will cut down on opportunities for partnerships and volunteerism. The majority of partnerships surround sustainability of multiple uses and wilderness will result in a reduction of these uses.

Response: The decision being made in this planning process only recommends wilderness, and does not designate. Descriptions of the consequences for partnerships and volunteerism are discussed by alternatives in final environmental impact statement, chapter 3, Sustainable Recreation, Partnerships.

8004

Wilderness designation would restrict grazing and the associated community and economy benefits; these impacts must be addressed in the analysis

Response: The forest planning process can only recommend lands be designated as wilderness. Only Congress can designate wilderness.

In 1980, the Congressional Grazing Guidelines clarified, "the general rule of thumb on grazing management in wilderness should be that activities or facilities established prior to the date of an area's designation as wilderness should be allowed to remain in place and may be replaced when necessary for the permittee to properly administer the grazing program." (H.R. 101-405 appendix A).

Wilderness designation of those areas recommended under the final revised plan would therefore not be expected to restrict current permitted grazing levels differently than under the current forest plan. Allotment grazing levels and the commitment of forage resources to grazing would

continue to be assessed and determined at the project (allotment) level during National Environmental Policy Act analysis.

Wilderness designation would prohibit access by motorized vehicle and use of mechanized equipment for maintenance of stock water developments, salt placement and potentially restrict installation of new range improvements (for instance water troughs) unless approved following a minimum requirements decision. Overall, the annual operating costs to the current permittees using motorized and mechanized equipment would have the potential to increase under these conditions. The extent of these effects is uncertain at this programmatic level.

8005

Wilderness designation would restrict mountain biking and the associated economic benefits; these impacts must be addressed in the analysis

Response: Wilderness recommendation, and any subsequent wilderness designation, would only restrict mountain biking under alternative C. There are no mechanized trails (mountain bike use) included in recommended wilderness in alternatives B or B-modified, only alternative C. Current mountain biking use in these areas in alternative C is limited given the topography, vegetation, and sandy soil. In addition, there are other local alternative mountain biking opportunities. Therefore, any potential economic effects to communities are expected to be negligible. See the analysis of effects in the final environmental impact statement chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Recommended Wilderness” section.

8006

Wilderness designation would restrict off-highway vehicle use and the associated economic benefits; these impacts must be addressed in the analysis

Response: No currently designated off-highway vehicle routes are included in the recommended wilderness areas. Therefore, there are no potential economic effects from changes in off-highway vehicle use expected. Unauthorized routes currently being used may be affected but a decision relating to the use of those routes has already been made and would not be modified by this planning effort. Impact to motorized opportunities are addressed in the final environmental impact statement (final environmental impact statement chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Recommended Wilderness” section).

8007

Wilderness recommendation in Alt C interferes with agricultural uses in lower valleys and existing water rights, which violates the 1866 Act and the 1877 Desert Land Act

Response: The final environmental impact statement analysis for recommended wilderness has been updated to address water rights in recommended wilderness (see final environmental impact statement, chapter 3, “Recommended Wilderness” section).

8008

Recommended wilderness in Esmeralda County would have a negative economic impact due to a reduction in real estate taxes. This will cause severe environmental damage to areas and structures downstream.

Response: Access to current uses in this area would not change. Therefore, there would be no expected decrease in property values as a result of this recommended wilderness. In addition, studies (cited in the “Benefits to People and Communities-Economic Conditions” section of

chapter 3 of the final environmental impact statement) have found wilderness can also lead to increases in economic development and housing prices as a result of the amenities it provides to people looking for those values.

8009

Wilderness designations and road closures on the Inyo National Forest have put considerably more recreational pressure on City lands in Inyo and Mono Counties, which have incurred more use, resource damage, and vandalism. Further restriction of public access to the Inyo National Forest would likely exacerbate this issue.

Response: Lands that were designated by Congress as wilderness in 2009 had no recreational facilities and little to no motorized route access, so there was minimal effect on access as a result of recent wilderness designations. The 2005 Travel Management Rule, subpart B, required the Forest Service to designate roads, trails, and areas open to motor vehicle use. Designations were made by class of vehicle and, if appropriate, by time of year. The final rule prohibited the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is not consistent with the designations (2005 Travel Management Rule). The Travel Management Rule resulted in a reduction in the amount of motorized opportunities on National Forest System lands on the Inyo National Forest. However, the 2009 travel management record of decision on the Inyo National Forest designated more than 800 miles of routes that were previously not system roads, as maintenance level 2 roads and approximately 157 miles of previously unauthorized motorized trails were added to the National Forest Transportation System. During the past decade, the Eastern Sierra continues to have ever-increasing visitation across all land jurisdictions. With the population of California increasing and the interest in outdoor recreation, we expect visitation to continue to increase, which can lead to increased resource impacts and crime, if not managed across all lands. An analysis of effects of recreation on adjacent lands was included in the final environmental impact statement in response to this comment (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Sustainable Recreation” section).

8010

Mechanized equipment is needed for several aspects of management in low elevation sagebrush and pinyon-juniper areas that would be hindered by additional wilderness. This includes fire suppression in these areas where fires move fast; removing trees encroached in sage-grouse habitat. These areas are also important for traditional Native American pine nut harvest and access could be restricted. Wilderness designation would hinder these land management uses and this factor needs to be considered.

Response: See response to comment 8002. In addition, a plan component has been added to recommended wilderness direction “Non-conforming projects or activities may be suitable if they are temporary in nature and are for the purposes of ecological restoration for at-risk species habitat” (MA-RWLD-SUIT).

The Wilderness Act generally prohibits mechanized and motorized use with some exceptions including for use in emergencies (including wildfire suppression) and when it is the minimum tool necessary for the administration of the wilderness. Desired condition TRIB-FW-DC-03 ensures Native Americans have access to areas that provide them an opportunity to practice traditional, cultural, and religious lifeways, such as plant gathering, fishing, hunting, and

ceremonial activities that are essential in maintaining their cultural identity and the continuity of their culture.

8011

The areas that are truly a wilderness have already been designated as such. No new wilderness until we address accurately what we already have in place.

Response: As part of revising the Inyo forest plan, we identified and evaluated lands that may be suitable for inclusion in the National Wilderness Preservation System. This is a requirement of the 2012 Planning Rule (36 CFR 219.7(c)(2)(v)). We are not designating any wilderness through this process, only recommending wilderness areas; only Congress can designate new wilderness areas.

8012

The Wilderness Evaluation Process was flawed and included areas that should not have been considered for wilderness, therefore, reconsider the evaluation process, complete site visits to each site, and eliminate areas that are not appropriate for wilderness designation.

Response: As part of revising the Inyo forest plan, we identified and evaluated lands that may be suitable for inclusion in the National Wilderness Preservation System. We are not designating any wilderness through this process; only Congress can take that action.

We followed the required process outlined in the 2012 Planning Rule (36 CFR 219.7(c)(2)(v)) and in the Forest Service Handbook 1909.12, chapter 80 to consider areas for wilderness recommendation. A detailed description of the inventory process, the process for evaluation of the inventory, and the process for identifying areas to analyze as recommended wilderness, can be found in the final environmental impact statement volume 2, appendix B: Wilderness Evaluation for the Inyo National Forest.

8013

The public was not sufficiently involved in the process. Also, the review process and timing of the plan made it difficult to participate.

Response: There are four steps in the wilderness recommendation process: inventory, evaluation, analysis, and recommendation. Public participation opportunities were afforded for each of the four steps in accordance with Forest Service Handbook 1909.12, chapter 70.61 (Wilderness) and Forest Service Handbook 1909.12, chapter 40 (Public Participation). In addition to these pubic participation requirements, the public was provided the opportunity to provide input on the wilderness inventory and evaluation methodology. Whenever possible, we avoided posting information on, or near, public holidays. If public access to the agency website was temporarily unavailable, the public was informed as soon as possible and afforded additional time to provide input. See final environmental impact statement, appendix B “Public Input on the Preliminary Inventory Map” “Public Input on the Evaluation” and “Public Input on Areas Considered for Analysis and Draft Evaluation Narratives” for a detailed description of the public comments received and considered during the process.

8014

Areas were included in Inyo County that have active roads. These areas should not have been included in the identified wilderness

Response: None of the new recommended wilderness areas in any alternative intersects an existing National Forest System road or motorized trail, either in Inyo County or other counties. The process used to identify possibly suitable wilderness areas took into account whether an area had existing system roads, and developed setbacks from those roads and removed the setbacks from the polygons (cherry stem roads). The process used to inventory, evaluate, analyze, and recommend wilderness areas is described in appendix B of the final environmental impact statement.

The roads criteria for inventory allows for non-system roads to be included in the inventory, but in the evaluation a determination was made as to the effect of their presence on the wilderness characteristics of the area. If they made it into a recommendation in alternative B, B-modified, or C, then the presence of these unauthorized routes hasn't degraded the areas to the point of being unsuitable for consideration for analysis as recommended wilderness.

8015

Sage Flat access is needlessly restricted by boundaries as proposed.

Response: The South Sierra Wilderness Additions – East (1) is the recommended wilderness polygon in the Sage Flat area. It was included as recommended wilderness only in alternative C, and not in the preferred alternative. Effects of alternative C to recreational uses, including motorized uses, were analyzed in the final environmental impact statement (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, Recommended Wilderness).

8016

More public input is needed as boundaries are refined to ensure consideration of recreational opportunities, management and multiple uses.

Response: There are four steps in the wilderness recommendation process: inventory, evaluation, analysis, and recommendation. Public participation opportunities were afforded for each of the four steps in accordance with Forest Service Handbook 1909.12, chapter 70.61 (Wilderness) and Forest Service Handbook 1909.12, chapter 40 (Public Participation). In addition to these pubic participation requirements, the public was provided the opportunity to provide input on the wilderness inventory and evaluation methodology. Whenever possible, we avoided posting information on, or near, public holidays. If public access to the agency website was temporarily unavailable, the public was informed as soon as possible and afforded additional time to provide input. See final environmental impact statement, appendix B "Public Input on the Preliminary Inventory Map" "Public Input on the Evaluation" and "Public Input on Areas Considered for Analysis and Draft Evaluation Narratives" for a detailed description of the public comments received and considered during the process.

8017

White Mountains East and West, Piper Mountain, and South Sierra recommended wilderness areas boundaries need to be adjusted

Response: These suggestions may be based on the existence of unauthorized routes, which the commenter may think are or should be authorized routes and therefore should prevent an area

from being suitable for wilderness. All of the polygons cited in the comment are included as recommended wilderness in alternative B-modified, the preferred alternative.

Because these routes are currently not on the National Forest Transportation System, they do not affect whether an area may be suitable for inclusion in the National Wilderness Preservation System (Forest Service Handbook 1909.12 – Version 02/14/2013, 71.22a(1)(b)).

The decision about what roads to include on the National Forest Transportation System was made in the Inyo National Forest's 2009 Travel Management record of decision (R5-MB-198a), with a few minor changes in subsequent decisions, and any changes to that system will not be made during the plan revision process.

8018

Some proposed wilderness boundaries encroach on existing 4x4 and off-highway vehicle trails, which limits off-highway vehicle recreation opportunities and concentrates use to smaller areas, intensifying the impacts. Consider adjustments to wilderness boundaries so they do not encroach or eliminate trails, especially those located at the edge of the boundaries.

Response: We buffered all authorized roads within proposed recommended wilderness areas by 200 feet on either side of the centerline of the road (final environmental impact statement, volume 2 appendix B, page 28). There are no designated off-highway vehicle routes included in recommended wilderness in any of the alternatives. The effects to motorized opportunities are located within the "Recommended "Wilderness" section of the final environmental impact statement, volume 1, chapter 3.

8024

The Soldier Canyon/Harkless area has motorized routes, and the area is only reasonably accessible by 4x4 or off-highway vehicle.

Response: Harkless Flat and its access roads are not within a recommended wilderness area in any of the alternatives. Therefore, none of the alternatives would affect motorized access to that area.

The Soldier Canyon polygon was recommended as wilderness only in alternative C. It was not recommended as wilderness in the preferred alternative, alternative B-modified. The Soldier Canyon polygon description in appendix B of the environmental impact statement stated, "The opportunity for solitude is limited due to the proximity to motorized recreation", agreeing with the commenter that motorized access is present in this area. The polygon also has all system roads and motorized trails cherry stemmed, so no existing motorized access would be affected even under alternative C. The effects of alternative C to recreational uses, including motorized uses, was analyzed in the final environmental impact statement chapter 3, Recommended Wilderness.

8025

Adjust the wilderness boundary at the south end to not extend past the base of the Sierras and out to the valley floor.

Response: The South Sierra Wilderness Addition – East (1) is the polygon that was recommended in alternative B and B-modified, with a larger polygon recommended in alternative C. The boundary follows natural features and was reshaped to exclude the northern portion around and north of Sage Flat and southwestern portion west of Long Canyon in alternative B and

B-modified (final environmental impact statement appendix B). The location of the boundary is intended to minimize the potential for incursions by motorized vehicles. For more information on this polygon, see Wilderness Evaluation appendix B.

8027

Grazing would be negatively impacted by the South Sierra and White Mountains additions.

Response: See response to comment 8004.

8028

All rights-of-way (ROW) for the state highway system (SHS) should be totally excluded from any Wilderness or Wild and Scenic River (WSR) designations.

Response: In response to this comment a statement was added into the wilderness evaluation appendix for those wilderness polygons that were located near a state highway right-of-way stating that the wilderness boundaries exclude existing State Highway System roads (final environmental impact statement volume 2: Appendices, appendix B). The evaluation of the degree to which an area can be managed for wilderness includes an evaluation of legally established rights or uses, such as road and utility rights-of-way (Forest Service Handbook 1909.12, Chapter 70, 72.1(5)). A 200-foot setback from roads was used to create the wilderness evaluation polygons (see final environmental impact statement appendix B). The boundaries of evaluation polygons carried forward and analyze as recommended wilderness were setback at least 200 feet from motorized roads and varies for motorized trails. These setbacks are adequate to exclude all rights-of-way for the State Highway System on the Inyo National Forest.

For wild and scenic rivers, see response to comment 8175.

8029

The following potential designations are adjacent to District 9 highways, but it appears that there is enough of a buffer so that Caltrans right-of-way is excluded. However, including statement such as "wilderness areas exclude existing State Highway System rights-of-way" could further affirm such exclusion.

Inyo National Forest:

- **Dexter Canyon SR 120**
- **Ansel Adams SR 158, John Muir Wilderness SR 168 (west)**
- **Marble Canyon SR 168 (east)**
- **Soldier Canyon SR 168 (east).**

Sequoia National Forest:

- **Kiava SR 178**

Response: See response to comment 8028.

8030

Proposed areas contain transmission and distribution lines as well as Pacific Gas and Electric Company and Los Angeles Department of Water and Power facilities. These

proposed wilderness additions would pose major concerns and challenges to routine maintenance activities such as vegetation management and electric pole replacement.

Response: In their comment letter, Los Angeles Department of Water and Power (LADWP) listed 28 facilities that could be impacted by future wilderness designation. Of those facilities, only one is within an area that was recommended as wilderness in the preferred alternative, alternative B-modified. That was their facility they listed as, “Haiwee Creek Bypass Pipeline Intake”, which may be within the South Sierra Wilderness Additions – East (1) polygon. The others are all within areas recommended as wilderness only in alternative C, or the facilities are only proposed, and do not yet exist on the ground.

We sent a request to LADWP on August 24, 2017 to verify the location of the structure mentioned in their comment letter. After 3 additional requests for this information, we never received confirmation this structure was located in the South Sierra Wilderness Additions – East (1) polygon (USDA Email correspondence with LADWP, September 27, 2017). Because of the lack of verifying the location of this structure, we assumed it was there and determined that the plan could increase the cost and complexity for maintaining those facilities, if the site is off a designated route. The final environmental impact statement includes the potential effects of alternative C on utility companies such as LADWP, as well as private individuals, in terms of costs of doing business or whether they could put in new needed facilities or replace old ones. This discussion is in the “Recommended Wilderness: Special Uses and Other Uses” section of chapter 3 in the final environmental impact statement.

8031

1308, Marble Creek should not be included due to containing County maintained roads, and other infrastructure, including historic mining sites.

Response: This area was not recommended as wilderness in the preferred alternative. Therefore, the plan will not affect motorized access or maintenance on the road. The Marble Canyon Road was not inventoried by Inyo National Forest personnel as part of the 2009 travel management process, and therefore was never analyzed as part of the National Forest Transportation system.

Because this road is a major road that should have been included on our transportation system, we altered the Marble Creek recommended wilderness polygon in alternative C to create a buffer around this road that is excluded from the wilderness boundary. The rest of the polygon still has sufficient wilderness characteristics as explained in the final environmental impact statement, volume 2, appendix B.

8032

Polygon 1308 is in Esmeralda County. Esmeralda County Master Plan and the Esmeralda County Road Use Plan both prohibit any "wilderness" areas inside the county boundaries. There are existing and historic uses that make it not suitable.

Response: These comments regarding uses, structures, and roads has been incorporated into the evaluation for Polygon 1308 (Marble Creek) (final environmental impact statement volume 2, appendix B). The Marble Creek road has been incorporated into our transportation system, buffered by 200 feet and excluded from the wilderness boundary. The final environmental impact statement includes an effects analysis of the current activities and uses within this polygon and the impacts wilderness recommendation would have on those uses (final environmental impact statement chapter 3, revision topic 3: Sustainable Recreation and Designated Areas,

"Recommended Wilderness" section). The draft record of decision explains the rationale for the recommendation for inclusion in the wilderness system.

While the responsible official must review County plans for consistency, he does not need to incorporate County objectives that do not comply with meet Federal laws, regulations, or policies. The analysis consistency with County plans is included in appendix E of the final environmental impact statement (volume 2).

8034

West of Piper Mountain should not be included because it contains existing roads and a wildlife guzzler

Response: This polygon was not recommended as wilderness in alternative B or B-modified. It was recommended in alternative C. The effects of alternative C to recreational uses, including motorized uses, was analyzed in the final environmental impact statement (final environmental impact statement chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Recommended Wilderness" section).

None of the new recommended wilderness areas in any alternative contain any existing National Forest System road or motorized trail, either in Inyo County or other counties. Therefore, none of the new wilderness recommendations in alternative B, B-modified, or C affect current legal motorized access. The process used to identify areas suitable for recommendation as wilderness areas took into account whether an area had existing system roads. Recommended wilderness areas are set back a minimum of 200 feet from all system roads. The process used to inventory, evaluate, analyze, and recommend wilderness areas is described in appendix C of the final environmental impact statement.

8037

Do not include the Mazourka Peak area because it contains a road.

Response: See response to comment 8034.

8038

Do not include the Leidy Creek area because the White Mountain Ranch has water rights in that area and uses heavy equipment in the area to mitigate flooding.

Response: In response to this comment, the use of heavy equipment was noted in the description of this polygon under current uses (final environmental impact statement, volume 2, appendix B). The wilderness boundary is offset from any authorized roads by 200 feet, which should allow any need for heavy equipment use along the road. Leidy Creek is not recommended wilderness in alternative B-modified.

See response to comment 8007.

8039

Do not include the South Sierra area, which includes water supply improvements.

Response: The process for inventory and evaluation of polygons for wilderness recommendations was described in the final environmental impact statement, volume 2, appendix B. It describes that areas with National Forest System roads and motorized trails were used to draw the polygons, so that those were excluded or prevented a polygon from being suitable for

inclusion. Past timber harvest would not necessarily prevent an area from being suitable, though the Forest did consider, "whether the composition of plant and animal communities appear natural" (final environmental impact statement, volume 2 appendix B). An example of a timber plantation was given as an area that would not meet the naturalness criteria, but some remaining stumps would not necessarily prevent an area from appearing natural overall. Water rights were not considered because the rights themselves do not represent a departure from apparent naturalness. Also, see response to comment 8007 for a discussion of water infrastructure effects analysis.

8040

Do not include the Minaret Vista area due to the need for access for search and rescue.

Response: This polygon was not recommended as wilderness in the preferred alternative, alternative B-modified or any of the alternatives.

8042

Do not include the Deep Springs due to a road in the area that is not accurately reflected on maps.

Response: We used the authorized routes in the National Forest Transportation System. Unauthorized routes were not included in the wilderness inventory or evaluation. The data used by the Inyo incorporated all the authorized routes within the Deep Springs North polygon, buffered them by 200 feet, and excluded them from the recommended wilderness polygon (final environmental impact statement, volume 2. appendix B, Deep Springs North description). Furthermore, Deep Springs is not in alternative B-modified. See response to comment 8034.

8044

When refining boundaries, consider noise and provide a half mile buffer along all state routes.

Response: In the analysis, the deciding official recommends a boundary that is easy to identify and locate on the ground, and that supports management of the area. Direction for defining boundaries for recommended wilderness is located in Forest Service Handbook 1909.12 chapter 70-Wilderness –73-Analysis. The impacts of sound on opportunities for solitude are considered in the Wilderness Evaluation Process. Results of the wilderness evaluation are found in final environmental impact statement appendix B.

8045

Areas on the Inyo National Forest that should not have been included as recommended wilderness (varied specific reasons including roads, mines, social justice, active management for species at risk including sage-grouse, line hard to find on the ground for management): Polygon IDs 1281, 1391, 1012, 1236, 1242, 1258, 1068, 1179, 1248, 1355, 1361, 1550, 1246, 1246, 1281.

Response: Of the polygons mentioned in this comment, three (1281 – White Mountain Additions, 1391- South Sierra, and 1246-Piper Mountain (1)) have some portion that was brought forward into alternative B and B-modified as recommended wilderness. The others were recommended only in alternative C.

The evaluation narratives for these polygons, included in appendix B of the final environmental impact statement, describe the features within these areas that may affect the manageability of

these areas; for example, roads, mines, sage-grouse management that may include mechanical thinning of trees, and others. The rationale used by the forest supervisor to determine whether to include polygons in alternatives B, B-modified, or C is included in the "Preliminary Administrative Recommendations" section of the record of decision.

Also see the response to comment 8014, regarding roads.

8046

The repetition of polygon numbers and changes of names make these areas very difficult to identify and evaluate.

Response: The Wilderness Evaluation Process required for forest plan revision was a stepped, screening process beginning with large areas identified as polygons with numbers. Based on the evaluation of the polygons, smaller subsets of these polygons (called "Specific Areas Analyzed as Recommended Wilderness") were identified by names. For clarification, polygon numbers, names and acres are displayed in the final environmental impact statement appendix B, table B-3.

8047

Maps and descriptions were inadequate or missing for polygon IDs (Inyo National Forest only?) 1339, 1357, 1391.

Response: The description of polygon 1339 (Pizona-Truman Meadows) can be found on page 163 and maps B-4 and B-26 of appendix B (final environmental impact statement volume 2). Description for polygon 1357 (South Huntoon Creek) can be found on page 171 and maps B-3 and B-30. Polygons 1339 and 1357 are not included as recommended in alternative B-modified.

Descriptions for polygon 1391 (Golden Trout Wilderness Addition – East; South Sierra Wilderness Addition – East (1); and South Sierra Wilderness Addition – East (2) can be found on pages 145, 171, and 173 and maps B-10, B-18 and B-31. Portions of polygon 1391 are included in alternative B-modified. This includes the South Sierra Wilderness Addition – East (1). The other two portions of this polygon and not included in alternative B or B-modified.

8048

When revising boundaries, consider providing a 200-ft buffer around all roads to allow for road maintenance and the ability to reroute roads in the case of washouts or if there are environmentally sensitive areas that should be avoided. In any case, being able to move the road 200 feet in either direction will help to stop the creation of illegal roads from people driving around obstructions and would help to keep vehicles further from sensitive areas.

Response: We used a 200-foot setback from all authorized roads when they occurred within or adjacent to a polygon in the evaluation process (final environmental impact statement, volume 2 appendix B, page 28). This setback varies for motorized trails depending on the type of use.

8049

Whitney Portal is characterized as a wilderness area, but is so heavily used that I believe this is mischaracterized. Day hikers, campers and climbers are so constricted by the topography of the canyon that it is very congested and heavily populated throughout the permit season.

Response: The Whitney Portal area was not included in the wilderness inventory or evaluation process because it did not meet the requirements for the inventory. The remaining portion of the

Whitney Portal area that is not within the John Muir Wilderness was not greater than 5,000 acres or was not of sufficient size to make practicable its preservation and use as wilderness (Forest Service Handbook 1909.12, chapter 70, 71.21).

8050

The draft environmental impact statement failed to explain the need for additional wilderness designation. The number of designated areas currently existing on forest are adequate; additional designations are not recommended. The public needs more general forest and multiple use areas.

Response: The final environmental impact statement analyzed the effects of recommended wilderness in alternatives B, B-modified, C, and D. Alternative D did not include any proposal for additional wilderness. This analysis can be found in the final environmental impact statement, volume 1 chapter 3, "Recommended Wilderness" section.

8051

Existing designated wilderness need better management, not just protection. Introducing new areas on a constrained wilderness maintenance budget would further limit management on existing areas. The Forest Service should focus on improving instead of extending designated wilderness.

Response: The 2012 Planning Rule states that forests need to identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation (36 CFR section 219.7 (v)). Section 4(b) of the Wilderness Act indicates each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area (16 U.S.C 1131-1136, 1964, as amended). The final environmental impact statement analyzes the effects of each alternative on designated and recommended wilderness areas in the "Wilderness" section of revision topic 3: Sustainable Recreation and Designated Areas of chapter 3. In response to this comment, the analysis in the final environmental impact statement explains the potential constraints of managing more areas as recommended wilderness (chapter 3, Topic 3: Sustainable Recreation and Designated Areas, "Wilderness" section).

8052

Now is the best time to have added wilderness because new pressures will make adding wilderness more difficult in the future. Recreational demands are increasing rapidly and there are also more demands on all of these national forests. There are many threats to our public lands from extended motorized use, the push for allowing more bicycles in areas where they are not now permitted, more and more users of Forest Service lands for recreation, grazing, mining for water and metals, collectors of rocks, etc.

Response: As part of revising the Inyo forest plan, we identified and evaluated lands that may be suitable for inclusion in the National Wilderness Preservation System. This is a requirement of the 2012 Planning Rule (36 CFR 219.7(c)(2)(v)). Alternative B-modified, the preferred alternative, does include new wilderness recommendations. The final plan recommends areas; however, only Congress has the authority to designate wilderness.

An analysis of the effects of recommended wilderness, including trade-offs of uses and activities, can be found in final environmental impact statement, chapter 3, Recommended Wilderness.

8053

New wilderness should not be designated without a scientific baseline and an active monitoring plan; therefore, do not designate any new wilderness until a baseline is establish, and there is monitoring data that shows new wilderness designations would be beneficial.

Response: The 2012 Planning Rule (36 CFR 219.7(c)(2)(v)) requires the Forest Service to identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System (NWPS) and determine whether to recommend any such lands for wilderness designation. We are not designating any wilderness through this process; only Congress can take that action.

8054

Alternative B does not designate much additional wilderness on the Inyo, with no new wilderness designated on the Sierra and Sequoia Forests, and wilderness provides multiple benefits that cannot be gained in other ways; therefore, please consider designating additional wilderness to provide more quiet recreation opportunities and more resource protections.

Response: The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section of the record of decision). The description of the areas inventoried and evaluated, including their general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the final environmental impact statement, volume 2 appendix B.

8055

New wilderness should be designated adjacent to existing wilderness where possible to provide contiguous habitat.

Response: No wilderness is being designated as part of plan revision, only recommended for designation. Only Congress can designate wilderness.

The preferred alternative, alternative B-modified, only recommends wilderness that would be adjacent to existing designated wilderness. Alternative C recommends the same adjacent areas plus additional areas that are mostly not adjacent to designated wilderness. While adding only adjacent areas may provide certain benefits such as ease of management and less fragmented habitat, adding non-adjacent areas would increase species diversity found in the Inyo's existing wilderness by adding acres in vegetation types which are known to be diverse (such as aspen), or by adding vegetation types that are less represented within the existing wilderness areas. Thus, the two alternatives represent trade-offs.

8056

New wilderness should be designated in low-elevation areas and under-represented ecosystem types.

Response: Wilderness recommendations for low-elevation areas were considered as part of alternative C. This alternative would provide higher species richness by including vegetation types such as aspen stands. Additionally, it would lead to more acres recommended for wilderness designation in vegetation types that are currently less common or absent. The record of decision provides rationale for the responsible official's recommendation for inclusion in the National

Wilderness Preservation System. This alone does not determine their ultimate designation as only Congress can designate wilderness.

8057

New wilderness designations allow a return to natural fire patterns on the landscape

Response: Alternatives B, B-modified, and C all recommend additional wilderness acres for consideration by Congress (only Congress can designate wilderness). We manage fire for a number of objectives and goals, and the Inyo is divided into several fire management zones to identify where certain priorities are highest (see draft forest plan, chapter 3, Strategic Fire Management Zones). See final environmental impact statement, chapter 3, Recommended Wilderness for a discussion of the effects of these designations on managed fire.

8058

New wilderness designations provide protection for at-risk species, including marten, spotted owl, Pacific fisher, northern goshawk and numerous fish and other aquatic species.

Response: Alternatives B, B-modified, and C include recommending additional acres be designated as wilderness by Congress (only Congress can designate wilderness). See final environmental impact statement chapter 3, Recommended Wilderness for an analysis of the effects of wilderness on the protection of at-risk species.

8059

Designation of new wilderness can provide needed protection for habitat in the face of climate change.

Response: Alternatives B, B-modified, and C include recommending additional acres be designated as wilderness by Congress (only Congress can designate wilderness). See final environmental impact statement, chapter 3, Recommended Wilderness for discussion on recommended wilderness and its benefits to habitat, including the stressor of climate variability.

8060

New wilderness designation provides protection of water.

Response: We are recommending additional wilderness in alternatives B, B-modified, and C and impacts of the varying amount of additional proposed wilderness on water resources are addressed in the final environmental impact statement (final environmental impact statement, chapter 3, Recommended Wilderness and Aquatics).

8061

New wilderness designation provides increased opportunities for solitude and quiet recreation.

Response: Alternatives B, B-modified, and C include recommending additional acres be designated as wilderness by Congress (only Congress can designate wilderness). See final environmental impact statement, chapter 3, Recommended Wilderness for an analysis of the effects of wilderness on opportunities for solitude and quiet recreation.

8062

The wilderness evaluation process was flawed and did not include areas that should have been included as wilderness; therefore, reconsider the evaluation process and include areas that are appropriate for wilderness designation.

Response: As part of revising the Inyo forest plan, we identified and evaluated lands that may be suitable for inclusion in the National Wilderness Preservation System. We used the required process outlined in the 2012 Planning Rule (36 CFR 219.7(c)(2)(v)) and in the Forest Service Handbook 1909.12, chapter 80 to consider areas for wilderness recommendation. A detailed description of the inventory process, the process for evaluation of the inventory, and the process for identifying areas to analyze as recommended wilderness can be found in the final environmental impact statement volume 2, appendix B: Wilderness Evaluation for the Inyo National Forest. The rationale for those areas evaluated but not included in the environmental analysis can be found in the final environmental impact statement volume 2, appendix B: Rationale for Areas Not Analyzed as Recommended Wilderness in the Environmental Impact Statement). The draft record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8065

Inyo wilderness additions.

Response: This area was included as recommended wilderness in alternative C. The description of the area, including its general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the final environmental impact statement, volume 2, appendix B, Wilderness Analysis. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended Wilderness ("Preliminary Administrative Recommendations" section in the record of decision). A description of which wilderness areas were included in the different alternatives analyzed is found in the final environmental impact statement, chapter 2 in the "Alternative Development Process" section.

8066

Glass Mountain

Response: See response to comment 8065. This area was included as recommended wilderness in alternative C. The description of the area, including its general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the environmental impact statement, volume 2, appendix B, Wilderness Analysis.

The rationale explaining why restoration activities can lead to management concerns with recommended wilderness has been improved in chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Recommended Wilderness" section of the final environmental impact statement.

8067

If not included in wilderness recommendations the Glass Mountains and the Deep Springs North areas should be classified as "semi-primitive non-motorized."

Response: Recommend wilderness in alternative B-modified and alternative B, and almost the entire area included as recommended wilderness in alternative C (including both the Glass Mountain and Deep Springs North areas) were classified as recreation opportunity spectrum class

"semi-primitive non-motorized." Other areas within those polygons were classified as, "semi-primitive motorized", due to buffers around existing system roads.

8068

South Sierra addition (East 1, West, Twisselman Botanical Area- SQF and Inyo National Forest).

Response: The South Sierra Addition – East (1) was included as recommended wilderness in alternative B and B-modified, though the size was reduced relative to alternative C, based on ability to locate the boundary on the ground, minimization of incursions by motorized vehicles, and vegetation management needs around communities (final environmental impact statement, volume 2, appendix B). The Twisselman Botanical Area does not occur on the Inyo National Forest.

The description of the area, including its general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the final environmental impact statement, volume 2, appendix B, Wilderness Analysis. The draft record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness in the ("Preliminary Administrative Recommendations" section in the record of decision).

8069

Ansel Adams addition (Horse Meadow)

Response: This area was included as recommended wilderness in alternative C, as "Ansel Adams Wilderness Addition – Northeast". The description of the area, including its general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the final environmental impact statement, volume 2, appendix B, Wilderness Analysis. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8070

Dexter Canyon

Response: This area was not included in the preferred alternative or alternative B, but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the Dexter Canyon polygon is included on pages 34 through 36 of the draft environmental impact statement, volume 2. The description of the area recommended in alternative C is in the final environmental impact statement, volume 2, appendix B, Wilderness Evaluation. Those descriptions include many of the values brought forward by the commenters. The draft record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8071

White Mountain East and West additions

Response: These areas were included as recommended wilderness in alternative B and B-modified, though the size was reduced relative to alternative C, based on ability to locate the boundary on the ground and adding buffers to existing roads.

The description of the area, including its general geography, topography, and vegetation, wilderness characteristics, and manageability, is in the final environmental impact statement, volume 2, appendix B, Wilderness Analysis. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8072

Deadman Canyon

Response: This area was not included in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the "North of Eureka Valley Road" polygon is included in the final environmental impact statement, volume 2, appendix B, Wilderness Evaluation. The description of the area recommended in alternative C is in the final environmental impact statement, volume 2, appendix B, Wilderness Analysis. Those descriptions include the values brought forward by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8073

Deep Springs North

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (titled Ancient Bristlecone Pine Forest and Wyman Canyon South) is included in the final environmental impact statement, volume 2, appendix B, Wilderness Evaluation. The description of the area recommended in alternative C is in the final environmental impact statement, in volume 2, appendix B, Wilderness Analysis. Those descriptions include many of the values brought forward by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8074

Piper Mountain Addition 1

Response: This area was included as recommended wilderness in alternative B-modified (the preferred alternative), alternative B, and alternative C. The polygon boundary was changed slightly so that the polygon is slightly larger under alternative B and B-modified than C (final environmental impact statement, volume 2, appendix B).

8075

Piper Mountain Addition 2

This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (titled North of Little Cowhorn Valley) is included on pages 79 and 80 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 160 and 161 of the final environmental impact statement, volume 2, appendix B. Those descriptions include many of the values brought forward

by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8076

Soldier Canyon

Response: This area was not recommended wilderness in the preferred alternative or alternative B, but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (titled North of Eureka Valley Road) is included on pages 80 and 81 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 169 and 170 of the final environmental impact statement, volume 2, appendix B. Those descriptions include many of the values brought forward by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8077

Inyo Mountains Wilderness Addition

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1236) is included on pages 77 and 78 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 169 and 170 of the final environmental impact statement, volume 2, appendix B. Those descriptions include many of the values brought forward by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8078

Excelsior

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1357) is included on pp 105-106 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C, which is now titled, "South Huntoon Creek" is on pp 171-172 of the final environmental impact statement, volume 2, appendix B. Those descriptions include many of the values brought forward by the commenters. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8079

Adobe Hills

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1355) is included on pages 104 and 105 of the final environmental impact statement, volume 2, appendix B. The description of the area

recommended in alternative C is on pages 133 and 134 of the final environmental impact statement, volume 2, appendix B. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8080

South Huntoon Creek

Response: Same as response to comment 8078 – polygon just has a different name.

8081

Huntoon Creek

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1361) is included on pages 107 and 108 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 147 and 148 of the final environmental impact statement, volume 2, appendix B. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8082

Pizona-Truman Meadows

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was analyzed as recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1339) is included on pages 101 and 102 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 163 and 164 of the final environmental impact statement, volume 2, appendix B. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness ("Preliminary Administrative Recommendations" section in the record of decision).

8096

Solitude Canyon (John Muir Wilderness addition – Mammoth Escarpment)

Response: This area was not recommended wilderness in any alternative. It was included in the initial evaluation, as polygon 1159. The evaluation narrative can be found on pages 64 and 65 of the final environmental impact statement, volume 2 appendix B. This narrative explains some of the features of the area that make it unsuitable for inclusion in the National Wilderness Preservation System, along with some of the features that do have wilderness characteristics. The final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table that summarizes the rationale for not including the polygon in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement volume 1 chapter 2).

8104

Benton Range

Response: This area was not recommended wilderness in any alternative. It was included in the initial evaluation, as polygon 1376. The evaluation narrative can be found on pages 108 and 109 of the final environmental impact statement, volume 2, appendix B. This narrative explains some of the features of the area that make it unsuitable for inclusion in the National Wilderness Preservation System. The final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table that summarizes the rationale for not including the polygon in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement volume 1 chapter 2).

8105

Mono Crater

Response: This area was not recommended wilderness in any alternative. It was included in the initial evaluation, as polygon 1072. The evaluation narrative can be found on pages 36 and 37 of the final environmental impact statement, volume 2, appendix B. This narrative explains some of the features of the area that make it unsuitable for inclusion in the National Wilderness Preservation System, along with some of the features that do have wilderness characteristics. The final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table that summarizes the rationale for not including the polygon in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement volume 1 chapter 2).

8106

Lower Slopes of Mt. Wood

Response: This area was not recommended wilderness in any alternative. It was included in the initial evaluation, as polygon 1179. The evaluation narrative can be found on pages 69 and 70 of the final environmental impact statement, volume 2, appendix B. This narrative explains some of the features of the area that make it unsuitable for inclusion in the National Wilderness Preservation System, along with some of the features that do have wilderness characteristics. The final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table that summarizes the rationale for not including the polygon in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement volume 1 chapter 2).

8107

Area between Lundy Canyon and Mt. Olsen

Response: This area was not recommended wilderness in any alternative. It was included in the initial evaluation, as polygon 1211. The evaluation narrative can be found on pages 74 and 75 of the final environmental impact statement, volume 2, appendix B. This narrative explains some of the features of the area that make it unsuitable for inclusion in the National Wilderness Preservation System, along with some of the features that do have wilderness characteristics. The final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table

that summarizes the rationale for not including the polygon in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement, volume 1, chapter 2).

8108

Roadless areas in the Mono Basin National Forest Scenic Area

Response: Some areas within the Mono Basin National Forest were evaluated and not found to meet the criteria for possible suitability for inclusion in the National Wilderness Preservation System, using the processes described on pages 23 and 28 of the final environmental impact statement, volume 2, appendix B. Other areas did not meet the initial screening to be included in the inventory, using the process described on pages 19 and 22 of the final environmental impact statement, volume 2, appendix B. For polygons 1195 and 1072, which were evaluated, the final environmental impact statement, volume 2, appendix B, "Analysis" section includes a table that summarizes the rationale for not including the polygons in an alternative as recommended wilderness. Further, we considered an alternative not analyzed in detail, which explains some of the effects of adding more inventoried polygons as recommended wilderness (final environmental impact statement, volume 1, chapter 2).

8109

Bohler Canyon

Response: This area was not recommended wilderness in alternative B-modified (the preferred alternative) or alternative B but was recommended wilderness in alternative C. The evaluation narrative for the parent polygon (1179) is included on pages 69 and 70 of the final environmental impact statement, volume 2, appendix B. The description of the area recommended in alternative C is on pages 135 and 136 of the final environmental impact statement, volume 2, appendix B. The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness in the preferred alternative or only in alternative C ("Preliminary Administrative Recommendations" section in the record of decision).

8111

The current existence of mechanized and/or motorized recreational use within areas do not necessarily degrade wilderness character and should not prevent areas being put forward as recommended wilderness in the final plans.

Response: The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness in alternative B-modified (the preferred alternative), alternative B, or only in alternative C ("Preliminary Administrative Recommendations" section in the record of decision). Appendix B in the final environmental impact statement explains the process used to evaluate areas for suitability for inclusion in the National Wilderness Preservation System and the process used to identify areas to analyze as recommended wilderness. This includes description of how roads and motorized use were considered in the process.

8112

Bicycles and motorized vehicles negatively impact the environment and quiet recreation opportunities; therefore, do not allow those uses in wilderness.

Response: Both mechanized and motorized use are prohibited in designated wilderness areas under section 4(c) of the 1964 Wilderness Act (except as necessary for the administration of the area and for the purposes of the Act). The Inyo forest plan revision would not alter this prohibition in any way.

8113

Commercial uses within wilderness should be restricted, and any that are permitted should be disclosed to the public.

Response: Commercial enterprises are generally prohibited in South Sierra Wilderness by section 4(c) of the Wilderness Act of 1964. A commercial enterprise is any use or activity undertaken for the purpose of the sale of products or services for the generation of funds or revenue, or for the promotion of a product, individual, or business, regardless of whether the use or activity is intended to produce a profit. Within the "Designated Area" section of the forest plan, suitability determinations were made and commercial enterprise sites, major utility corridors, and commercial harvesting of non-timber forest products are listed as an unsuitable uses in all designated wilderness (DA-WILD-SUIT).

A commercial service, however, is a type of commercial activity that is permitted under section 4(d)(6) of the Wilderness Act if the to the extent necessary, and appropriate, as determined by the managing agency, for realizing the recreational or other wilderness purposes of the area. Allowable commercial services may include those provided by packers, outfitters, and guides.

8114

Please consider designating research natural areas or other special designations in areas that were considered but rejected for wilderness.

Response: The criteria used to select areas eligible for wilderness designation or recommended for wilderness designation are different than those used to select research natural areas (research natural areas) (see forest plan, chapter 3, Designated Areas). Evaluating only units that were not recommended for wilderness designation by Congress would alter the process used to select and designate research natural areas. Whereas inventory and evaluation of lands with potential for wilderness designation is required to be part of forest plant revision under the 2012 Planning Rule, there is no such requirement for research natural areas. Research natural areas are designated by the regional forester with concurrence from the research area director, and may be designated outside of this forest plan revision.

8116

Standards for recommended wilderness prohibit only new non-conforming projects or activities and so does not clearly apply to existing non-conforming uses; therefore, the standard should include non-conforming uses on existing projects

Response: A component has been added to the Inyo's forest plan that more clearly addresses non-conforming uses in recommended wilderness (Plan; MA-RWLD-SUIT)

8117

Areas that are included in wilderness recommendations and/or as wilderness study areas are managed as wilderness and therefore are indirectly wilderness, which is inappropriate. Proposed wilderness areas in should not be managed as wilderness until they are officially designated by Congress.

Response: Chapter 70 –Wilderness of the Forest Service Land Management Handbook 1909.12 (Forest Service Handbook 1909.12, chapter 70) requires lands identified as recommended wilderness through the forest plan revision process to be managed to protect and maintain the social and ecological characteristics that provide the basis for the wilderness recommendation (chapter 70, 74.1). Recommended wilderness is not managed as wilderness. Rather, plan components for recommended wilderness support the wilderness characteristics until their designation as wilderness or other use is determined by Congress.

8118

Recreation opportunity spectrum classifications in the final plans should categorize recommended wilderness as primitive or semi-primitive non-motorized. The plans should develop standards that require management of these classification that will maintain, restore, and enhance those opportunity settings

Response: The primitive recreation opportunity spectrum class has been applied to all recommended wilderness in the final forest plan. Further detail regarding standards, suitability, and goals are described in the final plan, chapter 3 – Management Strategy (MA-RWLD-DC, STD, SUIT, GOAL).

Also see response to comment 8117.

8119

All wildlife guzzlers in proposed wilderness should remain open. The plans should add language to ensure this is granted in perpetuity rather than case specific permission.

Response: We know locations of some of the guzzlers on the Inyo but not all. Of the 27 known guzzlers, one is within areas recommended for wilderness in alternatives B and B-modified. It is within the Piper Mountain (1) area. Another 4 are in areas that are recommended for wilderness only in alternative C.

For recommended wilderness, there are plan components related to infrastructure and therefore guzzlers in wilderness. The desired conditions (MA-RWLD-DC) related to guzzlers in wilderness are “Existing improvements are not a substantial departure from apparent naturalness” and “Ecological processes in recommended areas are generally absent from human intervention” (page 54). The relevant standard (MA-RWLD-STD) is “Existing special uses may continue, new special uses may be considered if they are consistent with maintaining wilderness character” (page 55).

Guzzlers themselves may not be considered inconsistent with recommended wilderness management. However, the motorized access to maintain guzzlers would likely not be allowed in the recommended wilderness areas in the plan unless approved under a minimum requirements decision. Suitability determinations in the plan (MA-RWLD-SUIT) state “02 Motorized use on forest system roads and trails is not suitable, except as provided for in the Wilderness Act or Forest Service manual”. This suitability determination means that vehicle access would not be

allowed to guzzlers in recommended wilderness areas, unless it was provided for in the Wilderness Act or Forest Service manual.

The effects to the costs and difficulty of maintaining existing infrastructure, such as guzzlers, water diversions, and utility facilities, within recommended wilderness areas is included in the final environmental impact statement in chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Recommended Wilderness" section.

8120

Existing mechanized transport, and motorized travel and uses, including use of mountain bikes, should be allowed to continue within new designation wilderness areas if their use does not prevent the protection and maintenance of the social and ecological characteristics of the basis for the wilderness designation.

Response: Management direction in the forest plan was developed in accordance with direction in Forest Service Handbook 1909.12 chapter 70, 74.1 – Management of Recommended Areas. Per this direction, when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.

The four areas recommended as wilderness in alternative B and B-modified do not contain any authorized motorized travel routes. One of the areas recommended in alternatives B and B-modified does include some unauthorized routes. Mountain biking was not identified as a current use in any of the four wilderness recommendations in alternative B or B-modified.

Motorized vehicles, motorized equipment, and mechanized transport will not be suitable uses in the recommended wilderness areas. The suitability of the use of motorized vehicles, motorized equipment and mechanized transport, as well as other activities, in recommended wilderness is addressed in the Inyo forest plan, Suitability (MA-RWLD-SUIT).

8121

Fire management in recommended wilderness should be identical to that in designated wilderness.

Response: See response to comment 8139. The proposed and designated wilderness both reside within the same strategic fire management zones that have the same fire management guidance.

8122

For any new recommended wilderness designation, ensure that a sustainable level of pack and saddle stock access is accommodated and existing facilities are retained and maintained.

Response: The Inyo National Forest contains 2 horse camps; both area outside recommended wilderness areas. These would not be altered by the revised forest plan. Within wilderness, infrastructure is maintained only when it is necessary for administration of the wilderness or required by special provision of the Wilderness Act (such as for a pre-existing grazing allotment permit). Furthermore, wilderness designation generally allows customary non-motorized and non-mechanized use which usually includes use of pack and saddle stock. This would not change under the forest plan alternatives, thus a sustainable level of pack and saddle stock access should continue to be retained and maintained as before.

8123

Desired conditions for wilderness should be revised to reflect the need for these areas to provide solitude.

Response: See the forest plan, chapter 4, Design Criteria, for All Designated Wilderness, Ansel Adams and John Muir Wildernesses, and the South Sierra Wilderness where several desired conditions address solitude in these areas (DA-WILD-DC 01, 06, and 07; DA-WILD-REC1-DC 01; DA-WILD-REC2-DC 01; DA-WILD-REC3-DC 01; DA-WILD-OC1-DC 01; DA-WILD-OC2-DC01; DA-WILD-WSR1-DC 01; and DA-WILD-WSR2-DC 01).

8124

Desired conditions for wilderness should be revised to reflect the need for these areas to provide non-recreational benefits.

Response: See the forest plan, chapter 4 Design Criteria, for All Designated Wilderness, Ansel Adams and John Muir Wildernesses, and the South Sierra Wilderness where several desired conditions address management for non-recreation benefits in these areas. For example, Desired Condition 01 (MA-WILD-DC), page 49, which states "The wilderness character of each wilderness, including the qualities of untrammeled, natural, undeveloped, opportunities for solitude or primitive recreation, and other features of value (for example, ecological, geological or other features of scientific, educational, scenic, cultural or historical value unique to each specific wilderness area) are preserved and, when possible, enhanced."

8125

Restoration of streams and meadows in wilderness should be a top priority and should be reflected in the plans.

Response: See the forest plan, chapter 4 Design Criteria, for All Designated Wilderness, Ansel Adams and John Muir Wildernesses, and the South Sierra Wilderness where several desired conditions address management for streams, lakes, meadows, watersheds and riparian areas in these wildernesses. For example, see Desired Condition 02 (MA-WILD-DC), page 49, which states "Watersheds are functioning properly and exhibit high geomorphic, hydrologic, and biotic integrity relative to their natural and current potential condition."

8126

Suitability subsections in the draft plans only provide what activities are not suitable in wilderness, leaving out direction on activities that are suitable; therefore, add a discussion of the activities that are suitable in wilderness, including grazing.

Response: According to the 2012 Planning Rule, "Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2)." Grazing is specifically addressed as an allowed activity under the Wilderness Act of 1964, under special provisions. Suitability is further addressed in the Suitability of Lands Forest Service Handbook 1909.12, chapter 20, 22.15. "Suitability is based on the desired conditions applicable to those lands (36 CFR 219.7 e(1)(v))."

8127

Monument staff has found new populations of invasive plants at the hitching post at Rainbow Falls that is likely originally from a permittee in both of our agencies

accessing this site. We have implemented new regulations for our commercial users and the public.

Please consider the opportunity for consistency in requirements as in the Reds Meadow Valley/Fish Creek Place as several of our permittees and visitors are in both areas. These requirements are established in the both the Superintendent's Compendium and the conditions for all stock users including all Commercial Use Permittees: Prevention of the Introduction and/or Spread of Non-Native Plants …

Response: Weed control requirements for commercial pack stock permittees accessing the Ansel Adams Wilderness and John Muir Wilderness are currently found in the 2006 final environmental impact statement and 2007 record of decision for Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance. These requirements include a weed prevention and control plan included in the annual operating plan, and a recommendation that certified weed-free forage be used (to be required as certified weed-free hay and straw becomes available). New 20-year permits were issued in 2008. INV-FW-GDL-02 directs the Inyo to include weed control and prevention measures when issuing, amending, or re-issuing all permits, including for packstock operators.

8128

Wilderness Guidelines: Under "Wilderness Guidelines" for each planning unit, we request that you establish strict visitor use standards for preventing the introduction and spread of invasive and nonnative vegetation species in wilderness. The Wilderness Stewardship Plan for Sequoia and Kings Canyon National Parks includes a strategy for reducing the spread of nonnative and invasive weed species. We have implemented strict standards for what types of feed are brought into the parks wilderness by park visitors, commercial service providers, and by NPS administrative staff, and also for the types of feed and bedding that are allowable in the front country areas.

Response: The forest plan include language for invasive species that would be applied within wilderness areas as well as areas outside wilderness. A guideline requires hay, straw, and other forage products used for animal feed to be certified by California or Nevada or the North American Invasive Species Management Association (INV-FW-GDL 02). The plan also establishes desired conditions to minimize the spread and prevent the introduction of invasive species (INV-FW-DC 02), as well as objectives in treating invasive species (INV-FW-OBJ 01 and 02).

8129

We suggest you adopt the following language: "California or Nevada certified weed free forage (baled or loose hay, hay cubes, or straw bedding) are required when using hay products as supplemental forage or bedding in front country zones. Feed carried into wilderness is limited to commercially processed pellets, rolled grains, or fermented hay (for example, "Chaffhaye"). These products have a high level of mechanical milling, heat treatment, and/or anaerobic fermentation that result in much lower seed viability. Baled or loose hay and compressed hay cubes, which have little to no processing, are not allowed in wilderness."

Response: See response to comment 8128

In addition, feed carried into the wilderness needs to be certified weed free, which can include the use of commercially processed pellets, rolled grains, or fermented hay.

8130

The draft environmental impact statement does not adequately consider wilderness and instead focuses on recreation, which is not synonymous with wilderness; therefore, revise the draft environmental impact statement to acknowledge the importance of wilderness.

Response: In response to this comment, the analysis has been improved by adding clarity on the ecological effects, including benefits of recommended wilderness, in addition to the recreational effects (final environmental impact statement, volume 1, chapter 3, revision topic 3, Recommended Wilderness). The importance of wilderness is also discussed in other sections, including the "Terrestrial Ecosystems"; "Aquatics and Riparian Ecosystems"; and "Wildlife, Fish, and Plants" sections of the final environmental impact statement.

8131

Plan components with respect to wilderness are currently inadequate to provide an appropriate level of management.

Response: The final environmental impact statement analyzed the effects of plan components developed for wilderness and recommended wilderness (final environmental impact statement, volume 1 chapter 3) and determined the plan components provided for the continuation of wilderness character within the designated and recommended wilderness areas (see record of decision).

8132

Plan components should ensure that wilderness character is restored and maintained

Response: The Designated Area – "Wilderness" section of the forest plan contains the following desired condition that directly addresses preservation of wilderness character:

"The wilderness character of each wilderness, including the qualities of untrammeled, natural, undeveloped, opportunities for solitude or primitive recreation, and other features of value (for example, ecological, geological or other features of scientific, educational, scenic, cultural or historical value unique to each specific wilderness area) are preserved and, when possible, enhanced" (forest plan DA-WILD-DC 01).

Additionally, other wilderness plan components that support specific aspects or qualities of wilderness character are included in desired conditions, guidelines, and suitability sections (DA-WILD-DC 04, 05, 06, and 07; DA-WILD-GDL 01; and DA-WILD-SUIT 01).

8133

Plan components should be more specific with respect to guidelines regarding dogs. They should stay on trails and be kept on leashes so they do not affect visitors' personal space or wilderness experience. Verbal command/control does not adequately address this.

Response: The Forest Service supports restraining dogs and responsible dog ownership. Law requires that visitors confine their dogs. Title 36 of the Code of Federal Regulations section 261.8(d) prohibits "Possessing a dog not on a leash or otherwise confined." According to the 2012 Planning Rule, "Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2)."

8134

Carrying capacity of wilderness should be addressed in plan components with a more "hands-on" approach to management in order to protect these resources.

Response: The forest plan addresses carrying capacity in guideline DA-WILD-GDL 01: "Limit party size and number of stock per party to a level that protects social and natural resource values." The level of use may vary within or between wildernesses and can be addressed in separate wilderness plans. Developing these specific use levels would require project-level planning.

8135

Wilderness plan components need to more specifically address stock grazing.

Response: Within the "Rangeland Livestock Grazing" section of the plan, management direction establishes the grazing standards for the entire Inyo National Forest, this includes wilderness areas. Furthermore, the Wilderness Act does not prohibit livestock grazing within wilderness areas and the forest plan does not list livestock grazing as not suitable within wilderness areas (DA-WILD-SUIT 01).

The Wilderness Act provides that "The grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Additional Congressional direction for the management of grazing in wilderness is provided in several house reports: House Report 95-620, House Report 95-1321. House Report 96-617, House Report 96-1126, and House Report 101-405. Additionally, Forest Service Manual 2323.2 provides management direction for range management and grazing in wilderness. Livestock grazing is specifically addressed in grazing allotment management plans that are part of the grazing permit.

If referring to recreational stock use, Forest Service Manual 2323.04d, the forest supervisor is responsible for regulations for the use of pack and saddle stock. However 2323.12 policy contains the following direction for managers: maximize visitor freedom within the wilderness, minimize restrictions, and apply restrictions only after indirect measures have failed to protect the resource. Site conditions vary greatly by location, and decisions are best dealt with at the site level through grazing permit administration or visitor management as needed.

8136

Water quality and biotic integrity protection values should be addressed in plan components

Response: The plan provides plan components that address water quality and biotic integrity, this can be found in the forestwide watershed section (WTR-FW-DC 02, 03, 04, and 06; WTR-FW-STD 01 and 02); forestwide animal and plant species (SPEC-FW-DC 01, 02, and 04; SPEC-FW-STD 01; SPEC-FW-GDL 05); and riparian conservation areas (MA-RCA-DC 02, 03, 04, and 05; MA-RCA-STD 01, 04, 07, 08, and 10; RCA-MEAD-DC 01, 02, and 05; RCA-RIV-DC 01, 02, and 03; RCA-LLP-DC 01; and RCA-SPR-DC 01). All these plan components apply to areas of the Inyo National Forest outside and within designated wilderness.

8137

There is inadequate focus on wilderness management. There is no wilderness manager and insufficient backcountry rangers. No one in the field checking for permits, illegal

campsites or fires or providing information and help as needed for wilderness travelers or just seeing what's going on. Protection of wilderness resources and their proper management and care should be among the highest priorities in the forest, if for no other reason than the large proportion of the forest that is so designated. There needs to be additional direction to ensure that the wilderness plan components will be implemented.

Response: The Inyo National Forest has staff and law enforcement on the ground during busy times of year. Providing staff on the ground is constrained by our budgets. While we do believe that having 'boots on the ground' in order to enforce our rules and regulations is very important, it is not always possible. Therefore, we focus our efforts on the areas where there is potential for resource damage and conflicts. All of our field-going staff are encouraged to act as forest protection officers and report any resource damage or conflicts when they feel it is safe to do so. We also encourage the public to report the same damage or conflicts, when it is safe to do so, so that we can appropriately determine where to concentrate our staff time. The plan does contain language that may allow us to work with partners to help address resource issues within wilderness, or provide additional 'boots on the ground' (VIPS-FW-DC 01 and VIPS-FW-GOAL 04 and 05).

8138

Stewardship should include regular/routine maintenance of wilderness facilities and monitoring, education, and enforcement of wilderness uses and rules by professional rangers.

Response: This management direction is covered in the national direction. In 2015, the Forest Service began implementation of a new national performance measure called Wilderness Stewardship Performance which includes elements of workforce capacity, education, wilderness character baseline, agency management actions, and more. According to the 2012 Planning Rule, "Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2)."

8139

Lack of management of fuel conditions in wilderness and wildlands leads to an increase in fire risk to adjacent populated areas and increased probability of loss of characteristics and qualities that make them eligible for wilderness.

Response: The new strategic fire management zones were created using a risk assessment that identifies areas of risk. This analysis allows us to identify areas on the landscape that are lower risk in order to manage fires to meet resource objectives and areas that are higher risk to prioritize fuel treatments while maintaining or achieving desired conditions. The majority of the wilderness is within the wildfire maintenance and restoration zones where the risk is low-moderate to natural resources and assets (final plan, appendix A, figure 9). The management of wildfires to meet resource objectives is encouraged when conditions allow and it is safe to do so (final plan, chapter 3, MA-WRZ-DC, MA-WRZ-GOAL, MA-WRZ-STD, MA-WRZ-GDL and MA-WMZ-DC, MA-WMZ-GOAL, MA-WMZ-STD). Smaller portions of the wilderness are in the general protection zone, which identifies areas with a moderate to high risk to communities and natural resources (final plan, appendix A, figure 9). Fire management activities in this zone includes prioritizing fuel treatments and fire management activities where targeted ecological restoration and hazardous fuel reduction will be needed to contribute to the protection of communities (final plan, chapter 3, MA-GWPZ-DC, MA-GWPZ-GOAL, MA-GWPZ-STD, and MA-GWPZ-GDL).

8141

Managing fuel loading in wilderness areas is also necessary if these areas are to survive wildfires and use of mechanized equipment should be allowed as necessary.

Response: Within the plan, direction for the wildfire restoration and general wildfire protection zones (final plan, chapter 3, Strategic Fire Management Zones) addresses the need for fuels management to reduce the risk of wildland fire or manage wildland fire in wilderness areas. Although the plan does not prohibit the use of mechanized equipment in wilderness, it must be consistent with the law. Section 4(d)(1) of the Wilderness Act permits any measures necessary to control fire, insect outbreaks, or disease in wilderness areas. This includes the use of mechanized equipment, the building of fire roads, fire towers, fire breaks, or fire pre-suppression facilities where necessary, and other techniques for fire control. In short, anything necessary for the protection of the public health or safety is permissible.

House Report 95-540 and House Report 98-40 provide additional guidance on fire and fuels management. Forest Service Manual 2324.2 - Management of Fire also provides guidance for management of fire.

Collectively this guidance provides a range of responses in wilderness, provided the objectives of fire management in wilderness are to:

1. permit lightning-caused fires to play, as nearly as possible, their natural ecological role within wilderness; and
2. reduce, to an acceptable level, the risks and consequences of wildfire within wilderness or escaping from wilderness.

8142

Do not prohibit the use of chemical controls for vegetation management in wilderness areas. Guidelines for wilderness need to be revised to reflect this use.

Response: Guidelines are not necessary in the forest plan because the Wilderness Act of 1964 and Forest Service policy (Forest Service Manual 2320, Forest Service Manual 2880, Forest Service Manual 2150, and Forest Service Handbook 2109) already provide authority on guidance for the use of chemical controls in wilderness when it is determined to be the minimum necessary for the control of non-native invasive plants.

8143

There is no guideline regarding invasive species and means other than biocides and herbicides or a desired condition regarding invasive species in the previous plan section.

Response: Forestwide plan direction for invasive species establishes desired conditions to address the presence and reduction of invasive species (INV-FW-DC 02). There is also a standard that we would use an integrated pest management approach in the planning and implementation of all project and activities (Inyo National Forest-FW-STD 03), which would allow us to determine the type of treatments and approaches in treating noxious weeds. This invasive species direction applies forestwide, which includes designated and recommended wilderness areas. The forest plan does not authorize any particular treatment method in wilderness, which would be determined at the project-level. In wilderness, before any management action is taken, policy (Forest Service Manual 2320) directs us to complete a minimum requirements analysis to ensure

the goals are met using only the minimum necessary and to ensure any activity will retain or improve wilderness character.

8144

It seems that this guideline (02) is placed in the wrong location in the plan. It regards lands outside of the management area. This should be a forestwide guideline so that it applies to the correct lands.

Response: Wilderness desired condition 02 is specific direction for watersheds in wilderness and reflects the high integrity that should exist in wilderness. Additional forestwide watershed direction can be found in chapter 2 of the plan (WTR-FW).

8145

While the intent of this guideline (03) is good, the term "passive restoration" is confusing. Active measures are needed to restore campsites, using hand tools and native materials on site - 'iceberging' rocks, breaking up compacted soils to allow revegetation, importing debris to make the site unattractive to users - all of which should correctly be referred to as active restoration measures. The word “passive” should be removed from the guideline.

Response: In response to this comment we have removed the word “passive” from DA-WILD-GDL 01. This guideline now states: “Campsites that adversely affect water quality or exceed established density standards should receive treatments that promote restoration to natural condition.”

8146

Guideline 04 Regulation through means like party size and stock per party limits should be the last resort to protect social or natural resource values, after education and information, and trail and site management have been unsuccessful. Regulation degrades the quality of the user experience as defined in legislation, and agency policy and direction. Users should have an experience that is as untrammeled as the natural processes in designated Wilderness, and this should be a desired condition. The guideline should be rewritten to reflect this strategy.

Response: The plan establishes desired conditions that establish the management intent for designated wilderness (DA-WILD-DC). The goals, standards, guidelines, and suitability components support the movement of management toward achieving the desired conditions. This guideline would be used on a site-specific scale when resource or social resource values are at risk. The plan does not establish party or stock levels; these would be determined at the project level for each wilderness area.

We must not only adhere to direction in the plan but also other law, regulations, and policies that address wilderness management. For example, “Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value (Forest Service Manual 2320.6).”

8147

Suitability 01. It is not clear what qualifies as a developed recreation site. Construction of sidehill camping sites and similar efforts to reduce user impacts should not be disallowed. More clarity should be inherent in a rewrite of this direction.

Response: National direction has a definition of developed recreation site: “Developed Recreation Site. A recreation site that has a development scale of 3, 4, or 5” (Forest Service Handbook 2309.13 chapter 30.5). Under this definition, these would not be suitable in designated wilderness. By law, development is prohibited.

8148

Suitability 02. Why would there be a forest system road within designated Wilderness? It seems the flaw in this direction is easily remedied by removing "on forest system roads and trails." the following language should replace the existing: "Motorized use is not suitable, except as provided for in the Wilderness Act or Forest Service Manual."

Response: In responses to this comment, we clarified the suitability language in the plan within wilderness areas (DA-WILD-SUIT). The reference to forest system roads within wilderness has been removed.

8149

Suitability 06. What is a "permanent improvement"? Is a trail a permanent improvement, are signs or structures such as crib walls, drainage structures or bridges to protect riparian features permanent improvements? If so, this suitability statement needs to be rewritten to allow structures to protect ecosystem values or public safety.

Response: In responses to this comment, we clarified the suitability language in the plan within wilderness areas (DA-WILD-SUIT). The reference to permanent improvements has been removed.

8150

Suitability 08. This statement does not cover many commercial uses. This suitability statement should be extended to say: "Commercial uses that are not required for facilitating otherwise allowable uses that are wilderness dependent are not suitable. Large group events are not suitable." This direction is in line with current agency policy.

Response: The identification of suitability of lands is not required for every resource or activity. Commercial uses in wilderness are prohibited under the Wilderness Act 1964 section 4 (c) except as specifically provided for in the act and subject to existing private rights. Direction for wilderness management is found in Forest Service Manual 2323. National direction was determined to be adequate for management of the areas under consideration. According to the 2012 Planning Rule, “Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2).”

8152

There needs to be plan direction prohibiting drones flying over wilderness areas. These should be posted at entrances to wilderness areas.

Response: See response to comment 2096.

8153

Fuel build up ought not be a mitigating reason for reducing fuel build up in wilderness areas.

Response: The plan component related to fuels in Wilderness is Desired Condition (MA-WILD-DC): 03 "Fire is restored as an ecosystem process and natural disturbance agent in wilderness where possible." This desired condition reflects our desire to meet the wilderness characteristic of naturalness by allowing natural fire processes to be returned to the landscape where possible. The plan does not call for reducing fuel build up using methods that are in non-conformance with wilderness policy.

8154

In regards to limiting party size and number of stock [[MA-WILD-GDL-04]], I prefer to see no change in the current levels. I believe the use of stock in these areas are crucial to keeping Meadows open and productive while protecting them from becoming overgrown.

Response: The limits in place can be found in the wilderness plan. There is no proposal to change these at this time.

8155

Desired Condition 9 is too broad and restrictive. In managing visitor impacts, an important part of balancing human use and wilderness resource protection for managers is to guide or restrict overnight use in particular to areas that are resilient and which pose limited impacts on overall wilderness resources. This may mean identifying areas of appropriate overnight use. The desired condition as written misses the possibility that the overall protection of wilderness resources may indicate that expanded impacts in selected areas are the best protection strategy. The Desired Condition should be replaced with one that speaks to the overall protection of wilderness resources from visitor use impacts, and visitor use management to minimize impacts on wilderness resources, such as the following (suggested additions in italics, deletions in strikethrough):

"Concentrated use ~~areas~~ and associated resource impacts are *directed to more resilient parts of the landscape when possible, and prevented from* ~~not~~ expanding in ~~into~~ ~~nearby~~ *fragile* areas."

Response: In response to this comment, we have changed this desired condition to the recommended language, as suggested. The desired condition now states: "Concentrated use and associated resource impacts are directed to more resilient parts of the landscape when possible, and prevented from expanding in fragile areas" (DA-WILD-GDL 09).

8156

South Sierra Wilderness, Wilderness Opportunity Class 2, Desired Condition 01. This section contains the following "probability of encountering other users is low on trails". This contradicts current visitor use levels and trends on the Pacific Crest Trail and should not be a desired condition for the Pacific Crest Trail corridor in the South Sierra Wilderness.

Response: The final environmental impact statement addresses the impacts visitor use on the Pacific Crest Trail within the South Sierra Wilderness (final environmental impact statement, chapter 3 page 466). In this analysis, it is recognized that, within certain months of the year, visitation within the South Sierra Wilderness along the Pacific Crest Trail may be increased and

encounters are likely to be higher. The current plan direction is still consistent with the overall use and desired conditions of the South Sierra Wilderness in the Opportunity Class 2 area as stated in the plan (DA-WILD-OC2-DC 01).

8157

South Sierra Wilderness, Wilderness Opportunity Class 2, Desired Condition 02. The statement indicates that impacts will be confined to a corridor of 50 feet on either side of any trail. This is in stark contrast to Leave No Trace principles that the Forest Service helped develop and actively promotes nationally, which call for camping 200 feet from trails.

Response: The plan direction for the South Sierra Wilderness comes from the South Sierra Wilderness Plan (1991). Updating, or changing current designated wilderness direction from wilderness plans was not identified as a need to change (Inyo, Sequoia, and Sierra National Forests Need to Change Analysis 5/22/2104 and Inyo, Sequoia, and Sierra National Forests Need to Change Analysis-Supplement 6/5/2014); therefore, the plan direction was not changed and is carried forward as written in the 1991 South Sierra Wilderness plan.

8158

Ansel Adams, John Muir, Dinkey Lakes and Kaiser Wildernesses, Recreation Category 2 and 3; From the draft plan maps, it appears that there is a corridor around the Pacific Crest Trail in these areas that is designated Recreation Category 2. This should be verified and a discussion should be arranged between Pacific Crest Trail management partners to see whether Category 2 or 3 best suits this corridor. Directions for both categories are quite protective of the Pacific Crest Trail experience, and the question is whether descriptions of encounters with other visitors (01 in both categories) and overnight use impact are realistic. Some impact descriptions in Category 2 seem to better suit the Pacific Crest Trail and its management objective, so it might be a better fit to have a "recreation category Pacific Crest Trail" that would combine direction from Recreation Categories 2 and 3, recognizing use levels on the Pacific Crest Trail and combining it with higher aspirations for physical impacts.

Response: The plan direction for the Ansel Adams and John Muir Wildernesses comes from the John Muir, Ansel Adams and Dinkey Lakes Wilderness Plan (2001). Updating or changing current designated wilderness direction from wilderness plans was not identified as a need to change (Inyo, Sequoia, and Sierra National Forests need to change analysis 5/22/2104 and Inyo, Sequoia, and Sierra National Forests need to change analysis supplement 6/5/2014); therefore, the plan direction was not changed and is carried forward as written in the 2001 wilderness plan for these areas.

Management direction for the Pacific Crest National Scenic Trail would follow the direction in the plan within the management area section (MA-Pacific Crest Trail). This section establishes direction for the Pacific Crest Trail within and outside designated wilderness areas.

8161

Sustainable Recreation, Forestwide. Guideline 08 in the Sequoia plan, 12 in the Sierra plan and 09 in the Inyo plan makes little sense. First, the idea that costs are an overriding factor in making these management decisions, as compared to environmental impacts, or visitor benefits is unacceptable. Next is an assumption that retaining an existing site is more cost effective than replacing it. A new site, and perhaps abandoning the existing site, may be the best alternative if there is an aspect

of the current site that results in poor visitor experiences, impacts on other forest resources or the cost of working with a site that is inherently flawed. This guideline should be dropped in all three plans.

Response: The sustainable recreation forestwide guideline 09 in the draft plan has been dropped. It has been replaced by sustainable recreation forestwide guidelines (REC-FW-GDL- 01-13) in the final plan. These guidelines address the framework of how we will make decisions when managing recreation sites.

8162

Until the Forest Service develops and implements a clear and consistent national policy for safe fixed bolt and hardware maintenance in designated wilderness areas, climbing areas that are well developed (such as Needles) should not be recommended as wilderness in order to prevent future management issues associated with fixed anchor maintenance (power drills are not allowed in wilderness)

Longstanding and developed climbing resources (such as many of the climbing areas that are located in the Sequoia, Sierra and Inyo National Forests wilderness inventory) depend on long term stewardship in order to maintain the established climbing routes and descents. Well developed, existing climbing areas are "substantially noticeable and should thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues.

The Forest Service Land Management Planning Handbook clearly states that "[a]s a general rule, developed sites should not be included [as wilderness]" The following climbing areas are well-established and some were developed as early as the mid-1960s. These "developed sites" are "substantially noticeable," and should not be included in recommended wilderness in order to effectively maintain the exceptional climbing opportunities of today into the future: the entire Needles climbing area, Dome Rock, Kernville Rock, Church Domes and the Rectory, Kern Canyon Dome, Trapper Dome, and the Shuteye Ridge areas including Slasher Dome, 50 5.7 Dome, Big Sleep, Chiquito Dome, Crocodile Dome, Dreamscape, Eagles Nest, Gray Eagle, High Eagle, Midway Dome, Red Eagle, and Shangri La. Access Fund has provided the U.S. Forest Service with descriptions and GPS coordinates for the aforementioned climbing resources.

Response: Although climbing as a recreation activity is discussed in the wilderness evaluations (final environmental impact statement, volume 2 appendix B), the presence of fixed anchors and the impact of wilderness recommendation to the existing sport is not. The use of power drills would be prohibited by law in wilderness; however, the activity of climbing is allowed as a form of primitive recreation under the Wilderness Act 1964.

Developed recreation sites is defined in planning direction: “Developed Recreation Site. A recreation site that has a development scale of 3, 4, or 5” (Forest Service Handbook 2309.13 chapter 30.5). Fixed anchors would not be considered as a developed recreation site. Fixed anchors could be considered under Forest Service Handbook 1909.12, chapter 70 71.22b - Other Improvements. “Areas with minor, easily removable recreation developments may be included.”

The list of “developed sites” that are “substantially noticeable” mentioned in this comment do not occur on the Inyo National Forest. We do not know of any developed climbing areas in any of the recommended wilderness in alternative B-modified (the preferred alternative) or alternatives B or C. Therefore, wilderness recommendations in the plan should not affect climbing opportunities or climbing route maintenance methods. The final environmental impact statement has been updated

with a discussion of impacts to climbing opportunities (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Recommended Wilderness" section).

8163

Designated Areas, Wilderness. The bullet point in all three Forests' plans regarding rehabilitation of impacted sites is good, but there should be an addition stating strategic visitor use management might call for directing increased use to more resilient areas.

Response: The plan establishes desired conditions for which we must manage. Plan components addressing visitor use levels in wilderness are addressed in the designated wilderness section of the plan DA-WILD-DC, specifically DC 01, 04, 05, 06, 07, and 09. These desired conditions set the framework to address any impacts from increased visitor use and the need to direct management to other areas.

8164

Designated Areas, Wilderness. The language in the Sequoia plan "Through partnerships … increase the presence of wilderness rangers" should be incorporated into the Inyo and Sierra plans.

Response: The plan includes broad language about providing opportunities for increasing volunteerism in wilderness, and non-wilderness areas, in the "Volunteers, Interpretation, Partnerships, and Stewardship" section (VIPS-FW-DC 01 and 02; VIPS-FW-GOAL 01, 03, and 05).

8165

Designated Areas, Wilderness. The language in the Sequoia plan "Provide information to the public …" and should be incorporated into the Inyo Plan.

Response: The plan includes broad language about interpretation opportunities in the "Volunteers, Interpretation, Partnerships, and Stewardship" section that would include providing any information to the public, inside or outside wilderness (VIPS-FW-DC 03 and 05; VIPS-FW-GOAL 01 and 06).

8166

Designated Areas, Wilderness. The language in the Sequoia plan "Implement various management actions to prevent bicycle use in wilderness …" should be incorporated into the Inyo and Sierra plans.

Response: Although the plan does not specifically call out the prevention of bicycle use within wilderness, we must follow other laws, regulations, and policies in managing wilderness. Mechanized transport is prohibited within designated wilderness areas by the Wilderness Act (16 U.S.C. 1131-1136 section c). Inyo National Forest personnel patrol wilderness boundaries and manage to reduce mechanized incursions into wilderness when those occur. The plan provides direction to work with partners and volunteers to increase interpretation, which can include increase signage and patrols in areas with known repeated incursions (VIPS-FW-DC 02 and VIPS-FW-GOAL 01, 02, and 05).

8167

Designated Areas, Wilderness. The language in the Sequoia and Sierra plans "Establish and implement the national wilderness character monitoring protocol." Should be incorporated into the Inyo Plan.

Response: The wilderness character monitoring protocol is a subset of wilderness performance measures all national forests were required to implement, starting in 2016 (Wilderness Stewardship Performance Framework). Because use of these protocols is already required by existing regulations, we did not repeat it again in the revised plan (36 CFR Part 219.2 (2)).

Wild and Scenic Rivers, including Evaluation Process

8169

Some rivers, or portions of rivers, are missing from the inventory and should be added.

Response: A comprehensive inventory was completed and included every named river on a 7.5-minute, U.S. Geological Survey quadrangle map (final environmental impact statement, volume 2: Appendices, appendix C). The rivers and streams mentioned in the comments were reviewed to affirm that they were included in the inventory.

8170

The inventory process should not be restricted to rivers and streams named on 7.5--minute USGS quad maps because unnamed tributaries can significantly contribute to the free flowing condition and outstanding values of an eligible named stream.

Response: The wild and scenic river inventory process followed the direction in chapter 80 of the Forest Service Handbook 1909.12, section 82, 2 in determining which rivers to bring forward in the inventory. This direction says the rivers to be studied for eligibility include all rivers named on a standard U.S. Geological Survey 7.5-minute quadrangle map. The directives also state that we can consider including unnamed tributaries in the inventory. We did not consider the unnamed tributaries in the inventory, because it was not mandated in the directives.

8172

Some rivers, or portions of rivers identified by the public in scoping are missing from the list of free flowing streams with no explanations as to why they are not free flowing.

Response: Information about free-flowing rivers has been included in the wild and scenic river appendix (final environmental impact statement, volume 2: appendices, appendix C). Three rivers were found to be lacking free flow due to multiple dams and diversions with highly regulated flows that have reduced the system's natural flow.

8173

Failed to consider previous public and external agency input.

Response: See response to comment 8177. We reviewed public comments received during the opportunities provided, and we considered them in the final wild and scenic river evaluation (final environmental impact statement, volume 2: appendices, appendix C). Public comments provided additional information that was included in the determination of eligibility for several rivers that were not included as eligible in the draft environmental impact statement wild and scenic river evaluation. These changes include additional rivers eligible because of historic and

prehistoric outstandingly remarkable values; river values being identified for all inventoried rivers; list of free-flowing rivers; and rationale for why rivers were not determined eligible.

8174

Not all relevant information sources about potential river values were consulted during the evaluation.

Response: Several resources were consulted at the beginning of the process. These are documented in the final environmental impact statement, appendix C. Additional sources were identified by the public in comments received during the review of the draft wild and scenic river evaluation shared in December 2015 and January 2016 and on the wild and scenic river evaluation in the draft environmental impact statement. The interdisciplinary team reviewed any new information and information on changed conditions and considered this in the final wild and scenic river evaluation (final environmental impact statement, volume 2: appendices, appendix C). This new information lead to changes in the rationale for why a river was not eligible or clarifying the river-related values or outstanding remarkable values.

8175

Concern that the eligible wild and scenic river boundaries have not been adjusted to exclude Caltrans right-of-ways.

Response: At a minimum, a river study area includes the length of the identified river segment (Forest Service Handbook 1909.12, section 82.62) and the land within one-quarter mile of each river bank's ordinary high water mark along the river segment. The presence of roads, or a road right-of-way, does not disqualify a segment that is being evaluated from being found eligible if it is found to have free flow and at least one outstandingly remarkable value. At the time of a future suitability study, factors such as rights-of-way in the river corridor will be considered in determining whether a river is suitable and to recommend it as an addition to the National Wild and Scenic River System.

8176

Concern that local tribes were not consulted to identify any current river-related cultural and traditional use sites to evaluate potential outstandingly remarkable cultural values.

Response: Information on the wild and scenic river evaluation were shared with the Tribes at the same time as the public and at Tribal forums hosted by the Inyo staff. Information was received by the Tribes during these meetings about cultural outstanding remarkable values, which were identified in the final wild and scenic river evaluation (final environmental impact statement, volume 2: appendices, appendix C) for Rush Creek (segment 1.28.2).

8177

Public was not properly involved in the process.

Response: Public participation opportunities on the wild and scenic river inventory, evaluation, and preliminary classification did occur in accordance with Forest Service Handbook 1909.12, chapter 80.81.1 (Wild and Scenic Rivers) and Forest Service Handbook 1909.12, chapter 40 (Public Participation).

Specifically, at the beginning of the process, the public provided input on the wild and scenic rivers evaluation within the Inyo National Forest through two avenues: input during the

November 2013 assessment phase on the assessment topic papers for designated areas prepared by each national forest and through comments provided on the notice of intent and proposed action. A summary of this input and how it was used is documented in the final environmental impact statement, appendix C, page 194 and pages 199 through 201.

A draft of the wild and scenic river evaluation was shared with public in December 2015 and January 2016 and comments were solicited. Public input was received again during the public comments period on the draft environmental impact statement, including the appendix containing the wild and scenic river evaluation.

The forest did not include changes in the wild and scenic river eligibility based on public comments before the draft environmental impact statement was released. To remedy this situation, we carefully reviewed each comment between the draft and final environmental impact statement and made changes, in consideration of these comments. The changes that can be found in the final wild and scenic river appendix (final environmental impact statement, volume 2: appendices, appendix C). In addition, the wild and scenic river eligibility study was posted on the Inyo National Forest website prior to release of the final environmental impact statement and Inyo forest plan.

8178

Concern that the process was not documented according to Forest Service Handbook, 1909.12, chapter 82.9 because there is no complete list of free flowing rivers on each of the forests and because there is no narrative or rationale for some of the rivers found to be ineligible.

Response: The wild and scenic river evaluation for the Inyo National Forest (final environmental impact statement, volume 2: appendices, appendix C) contains a complete list of free-flowing rivers and rationale for three rivers that were determined not to be free flowing.

The revised wild and scenic river evaluation includes several tables that outline which rivers were determined ineligible and the rationale for that determination (final environmental impact statement, volume 2: appendices, appendix C, “Results of the Evaluation” section).

8179

Concern that some rivers identified in the inventory and found to have free flow do not have a full evaluation narrative that discloses the specific values evaluated and provides a rationale for their eligibility findings.

Response: Revisions have been made to the wild and scenic river evaluation (final environmental impact statement, volume 2: appendices, appendix C, “Results of the Evaluation” section) which provides a list of rivers that are free-flowing; lists the river-related values for these rivers; and gives rationale for why they do not have outstandingly remarkable values. The evaluation also describes rivers that are free flowing and have both river-related and outstandingly remarkable values.

8180

Concern that previous WSR evaluation work on the Inyo and Sequoia National Forest 1990s that were used in this process were never released and subject to full formal public review. Appendix C references the previous WSR evaluations, but does not

provide the level of detail needed for a reviewer to determine why certain decisions were made concerning eligibility or ineligibility.

Response: As explained in the wild and scenic river evaluation document (final environmental impact statement, volume 2: appendices, appendix C), we used previous studies on eligibility conducted in the 1990s (see project record). The information in these studies was limited, but a full review was conducted on each of these streams during this revision. All previously eligible, or studied, streams were reviewed following the steps outlined in the planning directives (Forest Service Handbook 1909.12, chapter 80).

8183

Each Forest used significantly different regions of comparison to identify outstanding values for streams assessed in appendix C which may have contributed to the widely varying results.

Response: The wild and scenic river evaluation for the Inyo National Forest was completed consistent with direction Forest Service Handbook 1909.12, chapter 80, 82.73 – Outstandingly Remarkable Values. There is no requirement that each national forest conduct its evaluation using the same regions of comparison (Forest Service Handbook 1909.12, chapter 80, 82.73), only that the region of comparison is consistent for the rivers evaluated within each national forest. The regions of comparison varied between the categories of outstandingly remarkable values because of several factors: 1) the scale of the category, such as recreation or geology in which a larger landscape-scale than the national forest boundary was used as the region of comparison and 2) the uniqueness of the category, such as prehistory and history in which the region of comparison was just the Inyo National Forest.

We sought to be consistent with regions of comparison used in past eligibility reviews but were unable to find documentation that defined the regions of comparison so the interdisciplinary team defined the regions of comparison, consistent with Forest Service Handbook 1909.12, chapter 80. This was then used to update previous eligibility determinations and to review new inventory for eligibility. The updated regions of comparison used for the Inyo's wild and scenic river evaluation can be found in the final environmental impact statement, appendix C, pages 206 and 207.

8184

The evaluation should more clearly define and use precise terms when identifying the region of comparison

Response: The descriptions of the regions of comparison have been improved to be more precise. The updated regions of comparison used for the Inyo's wild and scenic river evaluation can be found in the final environmental impact statement, appendix C, pages 206 and 207.

8185

Inyo National Forest should be the region of comparison for cultural/historic values.

Response: In response to this comment, the region of comparison for history and prehistory outstanding remarkable values was changed to the Inyo National Forest boundary (final environmental impact statement, volume 2: appendices, appendix C).

8188

Concern that the classification process ensures incorporation of input from local user groups and individuals on motorized uses and trails.

Response: We reviewed all comments received regarding classification concerns appropriately classifying rivers with motorized uses and trails within the river corridor. We did not make any classification changes based on these comments because the classification identified for the eligible rivers maintains motorized uses and follows the direction outlined for determining the classification of eligible wild and scenic rivers (Forest Service Handbook 1909.12, chapter 80, section 82.8).

8189

Concern that classification as wild or scenic and accompanying plan direction could potentially be used to ban or severely restrict motorized uses within or adjacent to the river corridor.

Response: The plan direction for management of eligible wild and scenic rivers follows interim management direction found in Forest Service Handbook 1909.12 chapter 80, section 84 which outlines management direction by classification for different resources including transportation system, recreational developments, and motorized travel. Classification takes into account existing motorized uses. Specifically it states that for rivers classified as “wild,” motorized travel on land or water may be permitted but is generally not compatible with this classification. Where motorized travel options are deemed to be necessary, such uses should be carefully defined and impacts mitigated. For rivers that are classified as “scenic” and “recreational,” motorized travel on land or water may be permitted, prohibited, or restricted to protect the river values (final environmental impact statement, volume 2: appendices, appendix C). At the site-scale, if an existing motorized use is not affecting the identified river values, it is not likely that use would be restricted due to the presence of an eligible wild and scenic river. If, at the site-scale, a use is determined to be affecting wild and scenic river values, then a decision will be made on how to resolve the issue on a case-by-case basis.

8190

Concern that over-snow vehicles use was not considered in the process of classification of wild and scenic rivers.

Response: Over-snow vehicle use was not considered an outstanding remarkable value for recreation because over-snow use is not considered to 1) contribute substantially to the functioning of the river ecosystem or 2) be river dependent and owe its location or existence to the presence of the river (Forest Service Handbook 1909.12, chapter 80, section 82.73).

The authorization of over-snow vehicle use will be determined when we complete travel management, subpart C (over-snow vehicle use). During that site-specific evaluation, the presence of over-snow vehicles use along eligible wild and scenic rivers would be evaluated. The plan does contain a winter recreation opportunity spectrum map that describes the opportunities and settings for winter motorized uses on the Inyo. This map would be adjusted after a final decision is made on authorized winter motorized uses during the travel management subpart C process.

8191

Additional wild and scenic river designations have the potential to overly restrict multiple uses.

Response: The wild and scenic river evaluation identifies the classification for each eligible river (final environmental impact statement, volume 2: appendices, appendix C). The plan follows interim management direction found in Forest Service Handbook 1909.12, chapter 80, section 84.3 which outlines interim management direction by classification for different multiple uses, such as grazing, motorized use, minerals, and recreation. This management direction differs between the river classes, “wild,” “scenic,” and “recreation”. Many uses are compatible with management of eligible, suitable, and designated wild and scenic rivers if the outstandingly remarkable values are protected.

No rivers will be designated or recommended as part of forest plan revision.

8192

Off-highway vehicle use

Response: See responses to Comments 8191 and 8189.

8193

Recreation access

Response: See responses to Comments 8191 and 8189.

The wild and scenic river evaluation identifies the classification for each eligible river (final environmental impact statement, volume 2: appendices, appendix C).

Recreation development in “wild” rivers should include only minimum facilities, such as toilets and refuse containers. Minimum facilities may be provided if necessary to protect and enhance water quality and other identified river values, while also providing for public recreation uses that do not adversely impact or degrade those values. All facilities must be located and designed to harmonize with the primitive character, natural, and cultural settings of the river corridor. The facilities must protect identified river values including water quality and be screened from view from the river to the extent possible.

Appropriate recreation development for “scenic” rivers include public-use facilities such as moderate-size campgrounds, simple sanitation and convenience facilities, public information centers, administrative sites, or river access developments. All facilities must be located and designed to harmonize with their natural and cultural settings, protect identified river values including water quality, and be screened from view from the river to the extent possible.

Appropriate recreation developments for “recreational” rivers include recreation, administrative, and river access facilities that may be located close to the river. However, recreational classification does not require extensive recreation development. All facilities must be located and designed to harmonize with their natural and cultural settings, protect identified river values including water quality, and be screened from view from the river to the extent possible.

8194

Timber Harvest/Vegetation Management

Response: See response to comment 8191.

The wild and scenic river evaluation identifies the classification for each eligible river (final environmental impact statement, volume 2: appendices, appendix C).

For rivers classified as "wild," cutting trees and other vegetation is not permitted except when needed in association with a primitive recreation experience, to protect users or to protect identified outstandingly remarkable values. Examples of such exceptions include activities to maintain trails or suppress wildfires. Prescribed fire and wildfires managed to meet resource objectives may be used to restore or maintain habitat for threatened, endangered, or sensitive species or restore the natural range of variability.

For eligible rivers classified as "scenic" and "recreational," a range of vegetation management and timber harvest practices are allowed, if these practices are designed to protect users or protect, restore, or enhance the river environment, including the long-term scenic character.

8195

Concern that eligible rivers identified in five FERC licensed project boundaries and near associated facilities, including transmission and distribution lines, will affect Pacific Gas and Electric Company maintenance and operations.

Response: See response to comment 8191.

The wild and scenic river evaluation identifies the classification for each eligible river (final environmental impact statement, volume 2: appendices, appendix C).

For hydroelectric power facilities, Forest-Service-identified eligible rivers are to be protected pending a suitability determination. Forest-Service-identified suitable rivers are to be protected for their free-flowing condition, water quality, and outstandingly remarkable values pending a designation by Congress. Maintenance and operations of Federal Energy Regulatory Commission facilities would only be affected if they threaten the rivers eligibility.

Utility proposals for eligible wild, scenic, and recreational rivers, such as new transmission lines (for example, gas lines, water lines, and similar linear facilities), are not compatible and are discouraged. Where no reasonable alternative exists, additional or new facilities should be restricted to existing rights-of-way. Where new rights-of-way would be necessary for a utility line, the proposed project must be evaluated as to its effect on the river's outstandingly remarkable values and classification. Any portion of a utility proposal that has the potential to affect the river's free-flowing character must be evaluated as a water resources project.

8196

There is concern that eligible wild and scenic rivers will be managed the same as designated WSRs and that the plan components will potentially restrict multiple uses, maintenance of infrastructure, and a full range of recreation opportunities.

Response: The plan outlines direction for both eligible wild and scenic rivers (final plan, chapter 3, area-specific desired conditions and management direction, "Eligible Wild and Scenic Rivers"

section) and designated wild and scenic rivers (final plan, chapter 3, designated areas, wild and scenic rivers).

The eligible wild and scenic rivers will be managed according to interim direction found in Forest Service Handbook 1909.12, chapter 80, section 84.3 which says these rivers must be managed to sufficiently protect and maintain free flow and outstandingly remarkable values unless a determination of ineligibility or non-suitability is made.

Designated wild and scenic river direction is provided until such time as a river management plan has been developed. At that time, direction for specific rivers would be developed in a separate planning process. The final plan direction emphasizes maintaining the free flowing condition, water quality, and specific outstandingly remarkable values of the designated river.

Also see responses to Comments 8191 through 8194.

8197

Concern over the potential affects to grazing from wild and scenic river designation.

Response: See response to comment 8191.

The wild and scenic river evaluation identifies the classification for each eligible river (final environmental impact statement, volume 2: appendices, appendix C).

The plan provides direction for eligible wild and scenic rivers, and these rivers will be managed following interim direction provided in Forest Service Handbook 1909.12 chapter 80, section 84, which outlines interim management direction by classification for different resources. Many uses, including livestock grazing, are compatible with management of eligible, suitable, and designated wild and scenic rivers if the river values are protected.

For eligible rivers classified as “wild,” domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s essentially primitive character.

For eligible rivers classified as “scenic,” domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s largely undeveloped character.

For eligible rivers classified as “recreational,” domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible.

No rivers will be designated or recommended as part of forest plan revision.

8198

Concern that WSR designation will not allow permittees to use areas they have been utilizing where they have paid permits.

Response: See response to comment 8197. As long as the identified rivers values are protected, there would be no change to the current permitted activities as a result of a wild and scenic river

eligibility finding. If there are concerns that river values may be at risk, then we would work with the permittee to modify permitted activities to ensure protection of the river values.

8199

Concern the WSR designation provides the Secretary broad discretion to condemn lands within WSR corridors.

Response: Under the wild and scenic river evaluation process, we are only making determinations of eligibility. This process will not be designating rivers under the Wild and Scenic Rivers Act. In the case of existing wild and scenic rivers, should the purchase of land become necessary, condemnation is typically a last resort and only used when: 1) land is clearly needed to protect resource values or provide necessary access for public recreational use and a purchase price cannot be agreed upon or 2) clear title to a property is needed, in which case condemnation is merely a legal procedure that has nothing to do with government and landowner differences.

8200

Concern that WSR designation will result in expensive requirements associated with protecting the river.

Response: We are only conducting an eligibility determination for wild and scenic rivers at this time. Direction on determination of eligibility does not include a requirement to look at the cost of managing eligible wild and scenic rivers. An analysis of the cost of managing designated wild and scenic rivers would be conducted during the suitability determination. We will follow direction for a suitability determination found in Forest Service Handbook 1909.12, chapter 80, section 83(5), which includes the following criteria: “The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by State and local agencies.”

8201

Concern that potential future third party lawsuits over grazing in WSR designation will reduce or eliminate use

Response: The plan follows interim management direction found in Forest Service Handbook 1909.12, chapter 80, section 84.3. Interim direction for livestock grazing for each of the different river classifications states that domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable. The determination of a river to be eligible did not lead to plan direction to remove livestock grazing from these areas.

8202

Several of the river segments that were found ineligible should be reconsidered for eligibility for inclusion in the National Wild and Scenic River System *(comments include specific segments requested to be re-evaluated and some have information about potential outstandingly remarkable values that were not identified in the present evaluation*).

Response: All public comments received were reviewed and comments that identified new information or changed conditions for specific rivers was extracted. The interdisciplinary team

reviewed the information, validated it, and adjusted the eligibility findings accordingly. The updated findings can be found in the final environmental impact statement, appendix C.

8203

Some rivers that were found eligible do not possess the outstandingly remarkable values that were identified in the evaluation.

Response: The outstandingly remarkable values findings were based on the process identified in Forest Service Handbook 1909.12 chapter 80. Any identified river-related values were carefully evaluated by the interdisciplinary team using the established outstandingly remarkable values criteria and region of comparison for each value. The rationale for the eligibility (or non-eligibility) findings has been updated since the draft environmental impact statement and is documented in the final environmental impact statement, appendix C.

8204

Species in springs, wetlands, wet meadows and lakes were not considered. Given the definition of WSRs in the WSRA, these should have been evaluated.

Response: In response to public comments. areas, including springs, wetlands, wet meadows and lakes, within the boundaries of the corridor being evaluated (1/4 mile on either side of the normal high-water mark), were considered by the interdisciplinary team. If a specific species or habitat was identified by the public then the team reviewed that information and, if validated, those values were evaluated using the established outstandingly remarkable values criteria and region of comparison (final environmental impact statement, volume 2: appendices, appendix C).

8205

Native American/cultural sites were not adequately considered.

Response: In the revised wild and scenic river evaluation, Native American cultural sites were evaluated to determine if they were outstandingly remarkable values using the established criteria for history, prehistory, and other (cultural) within the region of comparison (final environmental impact statement, volume 2, appendices, appendix C). Thirty-three river segments were found to be eligible for having a history, prehistory, or cultural outstandingly remarkable values or a combination of those values (final environmental impact statement, volume 2, appendices, appendix C).

8206

Concern that the changed conditions in flow regimes was not adequately considered.

Response: In response to these comments, we considered the free-flow and changed conditions of rivers considered in the evaluation (final environmental impact statement, volume 2, appendices, appendix C). Comments received on outstanding remarkable values for Dexter Creek, South Fork Birch Creek, O'Harrel Creek, Lee Vining Creek, Rush Creek, Walker Creek, Parker Creek, and Mill Creek were considered and changes to these river's river-related values, outstandingly remarkable values, and eligibility determination were adjusted, when applicable, based on these comments. For example, segments of Rush Creek and Parker Creek have been determined eligible, as well as O'Harrel Creek (final environmental impact statement, volume 2: appendices, appendix C). Wet Canyon was not included in the inventory and evaluation process because it was not named on the U.S. Geological Survey quadrangle map.

8207

Whitewater rafting and kayaking opportunities have not been adequately described in appendix C and because of their whitewater recreation, scenery, and water quality values they should have been found eligible (*specific information provided about several whitewater opportunities in comments*).

Response: Whitewater rafting opportunities were considered for recreation outstandingly remarkable values and were added into the narrative description for Hot Creek (segment 1.09.2) (final environmental impact statement, volume 2: appendices, appendix C).

8209

Cultural sites on the Inyo have not been formally researched is not an appropriate justification for not assessing historic/prehistoric values for WSR eligibility.

Response: The wild and scenic river evaluation has been updated in response to comments and now includes an improved assessment of historic, prehistoric and cultural values. The outstandingly remarkable values criteria used can be found in appendix C (final environmental impact statement, volume 2: appendices, appendix C).

8210

Concern that ORV criteria for outstanding Prehistory and History fails to consider current cultural values and uses of local Native American Tribes.

Response: The Inyo National Forest wild and scenic river evaluation included a process for considering current Native American values and uses for river segments (final environmental impact statement, volume 2: appendices, appendix C).

8211

There are tribal concerns that "Cultural" (traditional cultural values) are not identified for any Inyo National Forest river segments lists as one of the "outstandingly remarkable values." adding "Cultural" to the list of values for all recommended. Transparency on the decision to use Cultural would help the reader understand why Cultural wasn't selected.

Response: The Inyo National Forest wild and scenic river evaluation includes a description of cultural outstandingly remarkable values, and this value was identified for one river segment (Rush Creek, segment 1.28.2) (final environmental impact statement, volume 2: appendices, appendix C).

8212

Include as eligible the segment of Mill Creek below from US 395 to Mono Lake and the segment of Wilson Creek below the DeChambeau diversion with the condition that any eventual legislation include language that a WSR designation of these segments shall not impact or impair historic water rights, uses of water or activities on Conway or Mattly Ranches. (Mono County)

Response: These portions of Mill Creek (segments 1.18.6-1.18.12) and Wilson Creek (segment 1.216) were identified as having river-related values but not outstandingly remarkable values (final environmental impact statement, volume 2: appendices, appendix C). They are not listed as eligible wild and scenic rivers, no designation would occur, and there would be no impact or impairment to historic water rights or activities in the Conway or Mattly Ranch areas.

8213

The Inyo should consult with Los Angeles Department of Water and Power (LADP) on identifying river segments flowing through its property as eligible.

Response: We reviewed all the information provided by the public and considered this information during the wild and scenic river evaluation. We followed guidance for determining the rivers to be inventoried and evaluated provided in chapter 80 of Forest Service Handbook 1909.12.

8214

Little Hot Creek – Concern that a downstream barrier was inappropriately used to exclude the stream segment upstream from consideration.

Response: In the evaluation for Little Hot Creek (segment 1.084 in the wild and scenic river evaluation, final environmental impact statement, volume 2: appendices, appendix C), this stream is eligible as a wild and scenic river.

8215

Concern that the segments located within LADWP inholdings have not been found as eligible. The Forest Service has authority to and should assess streams within the boundaries of the federal reservation it manages (which includes both the Inyo Forest and the Mono Basin Scenic Area), including segments within inholdings)

Response: In the wild and scenic river evaluation (final environmental impact statement, volume 2: appendices, appendix C), a segment of Rush Creek (segment 1.28.2) occurs on Los Angeles Department of Water and Power lands and was determined to be eligible. Other stream segments were not determined to be eligible, not because they occurred on Los Angeles Department of Water and Power lands but because they did not have outstandingly remarkable values.

8216

Lone Pine Creek – Disagree with recreation finding that it is not river-related and therefore Recreation is not an ORV. Also, the narrative should acknowledge the opportunity to expand the eligibility finding by including at least two miles of the stream on BLM lands within the Alabama Hills Recreation Area the proposed Alabama Hills National Scenic Area.

Response: Lone Pine Creek (segments 1.087 and 1.13) has been found to be eligible based on recreational outstandingly remarkable values (final environmental impact statement, volume 2: appendices, appendix C). Direction in Forest Service Handbook 19009.12, chapter 80 (82.61) states “Ending points typically include the point of merger with a larger river or exit from the National Forest. Rivers may be extended beyond the National Forest boundary if a logical ending point is nearby, such as merger with the main stem of a larger river.” However, no logical ending point, such as a merger with a mainstem of a larger river, occurs outside the Inyo National Forest boundary; therefore, the eligibility determination and stream segment ends at the Inyo boundary.

8217

There is an agreement with LADWP to stop all diversions on Parker and Walker Creeks. This information should be considered in the WSR evaluation of these creeks.

Response: The presence of diversions along Parker and Walker Creeks did not preclude them from being evaluated as eligible. Both streams were identified as free-flowing. One segment of Parker Creek (segment 1.25.1) was determined eligible in the evaluation (final environmental

impact statement, volume 2: appendices, appendix C). Two segments (1.33.1 and 1.33.2) of Walker Creek were determined eligible in the evaluation (final environmental impact statement, volume 2: appendices, appendix C))

8218

Concern that if in the final WSR evaluation the U.S. Forest Service does decide to include an eligibility finding for the creeks below the Lundy hydro project, then it is essential that segments of both Mill and Wilson Creeks be treated equitably and be found eligible, otherwise it poses a complex set of problems related to water rights.

Response: In the evaluation for Mill and Wilson Creeks, the segments of Mill Creek that occur above-stream of the Lundy hydrologic project have been determined eligible (segments 1.105.2 and 1.18.1-1.18.4) (final environmental impact statement, volume 2: appendices, appendix C). Wilson Creek was not determined eligible because no outstandingly remarkable values were identified (final environmental impact statement, volume 2: appendices, appendix C). No creeks below the Lundy hydro project were found eligible; therefore, there is no issue with treating these streams equitably and water rights.

Inventoried Roadless Areas

8220

The Plan should manage all remaining roadless areas to protect their wild, non-motorized character while still allowing reasonable access for recreation uses.

Response: The Roadless Area Conservation Rule (36 CFR 294 subpart B, Protection of Inventoried Roadless Areas) and Forest Service policy guide and restrict management activities within inventoried roadless areas. Direction for managing inventoried roadless areas is located Forest Service Manual 2323.22 - Policy. According to the 2012 Planning Rule, “Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (CFR 219.2 (b) 2).”

Pacific Crest National Scenic Trail

8221

The Pacific Crest Trail Management Area in alternatives B and C provides components which would protect the nature and purposes of the Pacific Crest Trail, associated with its resources, qualities and values (campsites, water sources, and viewpoints):

Alternatives A and D do not protect the unique characteristics of the trail, associated resources, qualities, or values (campsites, water sources, and view areas).

Response: Management direction for the unique characteristics of the Pacific Crest Trail and its associated resource values and qualities does not vary by alternative and has the same plan components (final plan, chapter 3, Management Areas, Pacific Crest National Scenic Trail and Designated Areas, Wilderness).

One of the analysis assumptions (final environmental impact statement, chapter 3, Pacific Crest Trail) is more acres within the Pacific Crest Trail corridor means more protection for the resources, qualities, values, associated settings, and the primary uses of the Pacific Crest National Scenic Trail. The final environmental impact statement, chapter 3, Pacific Crest Trail, Methods

describes the size of the Pacific Crest Trail corridor and management area by alternative. Alternatives A and D have the least amount of acreage and alternatives B, B-modified, and C have more acres. The preferred alternative, (alternative B-modified) provides a trail corridor based on the Scenery Management System and the foreground distance zone.

In all alternatives, additional management direction to protect the unique characteristics of the trail on lands adjacent to the Pacific Crest Trail corridor is found in the sustainable recreation and sections of the final plan (final plan, chapter 2 "Sustainable Recreation and Scenery" sections).

8222

The forest plan Pacific Crest Trail MA direction (for instance, plan components) is not consistent with NTSA and EO 13195.

Response: The final plan (chapter 3, Management Areas, Pacific Crest National Scenic Trail Corridor) provides direction which provides consistency with the National Trails System Act and Executive Order 13195 by establishing a trail corridor and establishing plan components that provide for "outstanding journeys on horse and foot"(recreation opportunities), and the scenic, natural, and cultural values of the trail.

8223

Develop specific plan components (desired conditions, goals,, standards and guidelines) for the portion of the Pacific Crest Trail that overlaps the *John Muir Trail* that *Trail* that protect resources and addresses increased use Pacific Crest Trail plan components are inconsistent with those of the John Muir Trail both within and outside wilderness to provide consistent management where the trails overlap.

Response: The John Muir Trail is coincident with the Pacific Crest Trail for 170 of its 210 miles. The trail traverses through Yosemite and Sequoia and Kings Canyon National Parks and the Inyo and Sierra National Forests. Several section of the John Muir Trail are coincident with the Pacific Crest Trail on the Inyo National Forest. The Pacific Crest Trail Comprehensive Management Plan (1982) provides overall direction for the trail and requires each national forest or national park to have additional "unit" direction which is responsive to specific issues, opportunities, and problems. Management between plans should be compatible with each other, but there is allowance for local variations to respond to issues. (Forest Service Handbook 1909.12 24.3) See response to comment 4192.

The Inyo forest plan has Pacific Crest Trail plan components that apply to all of the Pacific Crest Trail (see the "Pacific Crest National Scenic Trail Corridor" section, forest plan chapter 3), including the coincident sections of the John Muir Trail. This direction protects the resources, qualities, and values of the trail, including the scenic, natural and recreation qualities. Visitor management strategies are specifically found in the potential management approach.

8224

The Pacific Crest Trail management area does not preserve the scenery.

Response: The forest plan has forestwide scenery direction (SCEN-FW) and desired conditions and scenery guidelines specific to the Pacific Crest Trail management areas in designated wilderness (MA-PCTW) and outside designated wilderness (MA-PCT). This direction provides for naturally appearing landscapes with high or very high scenic integrity objectives. Scenic integrity is a measure of the degree of visible disruption of the landscape character. Landscapes

with very minimal visual disruption are considered to have very high scenic integrity. See final environmental impact statement, Consequences Common to All Alternatives, “Scenery” section.

8225

Provide a minimum of 500 feet of centerline to ensure the tread and immediate environment are protected.

Response: The Pacific Crest Trail management areas (MA-PCT and MA-PCTW) exceed the minimum width of 500 feet of centerline. Forestwide scenery direction (SCEN-FW) and direction for the Pacific Crest Trail corridor (MA-PCTW and MA-PCT) provide for naturally appearing landscapes with high or very high scenic integrity objectives.

8226

Provide a corridor at least ½ mile wide (foreground) on both sides to simplify management and coordination along the trail and to protect the resource, qualities, and values of the trail.

Response: In the final plan (chapter 3, Management Areas), the management area has been renamed “Pacific Crest National Scenic Trail Corridor” and includes the lands in the visible foreground (up to one-half mile that is visible from the trail for a total corridor width of up to one mile). Plan components within the trail corridor add direction for the natural, scenic, and recreation qualities of the trail. Cultural resources are protected in the plan (CULT-FW) in desired conditions, standards, and guidelines.

8227

Protect the undisturbed and natural scenic values as seen from the Pacific Crest Trail by creating a one-mile corridor.

Response: See response to comment 8226.

8228

Have a minimum of Moderate (not Medium) SIO as seen from the Pacific Crest Trail.

Response: In the final plan, desired conditions for MA-PCTW and MA-PCT provide for a minimum scenic integrity objective of moderate on lands viewed from the trail beyond the management area. The error of using the term “medium” has been corrected.

8268

SIO should meet or exceed an SIO of Moderate.

Response: See response to comment 8228.

8229

Have SIOs of High or Very High as seen from the Pacific Crest Trail.

Response: The final plan directs management of scenery resources within the trail corridor as seen from the centerline of the trail.

Forestwide scenery direction for MA-PCTW and MA-PCT provide for naturally appearing panoramic landscapes for the Pacific Crest Trail Management areas and the surrounding national forest viewsheds. Additionally, guideline 01 for MA-PCTW and MA-PCT provides for high or very high scenic integrity.

8230

Prioritize land acquisition of private parcels within the management area using the optimal location review to provide sufficient land area on both sides of the trail to safeguard and preserve its character and ensure public ownership and permanent protection.

Response: On the Inyo National Forest, the Pacific Crest Trail parcels that need to be acquired to protect the resources, qualities, and values of the trail are inholdings within designated wilderness which are listed as high priority acquisitions in the forest plan (LAND-FW-Potential Management Approaches). MA-PCTW and MA-PCT include a potential management approach that addresses the Pacific Southwest regional process (optimal location review) for trail relocation and identification of land acquisition parcels in order to enhance the recreation experience and protect resources.

8231

The Pacific Crest Trail management area needs to be protected from activities that would threaten its values.

Response: The National Trail System Act directions in section 7(c) state "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established." The final plan provides plan components (MA-PCTW and MA-PCT) that provide for the natural, scenic, and recreation qualities of the trail. Cultural resources are protected in the plan (CULT-FW) in desired conditions, standards, and guidelines.

8341

Allow vegetation management for fire and thinning but not timber production (suitability).

Response: MA-PCT plan components allow for vegetation management where it meets the desired conditions of the management area.

The Pacific Crest Trail corridor, outside designated wilderness, is included in lands identified as suitable for timber production if there is a reasonable assurance of regeneration, and where forest management is consistent with the Pacific Crest Trail desired conditions for a naturally appearing landscape surrounding the trail (final environmental impact statement, chapter 3, Pacific Crest Trail Vegetation Management and Fuels Treatment).

8232

Buffer between the trail and any logging or clear cutting projects.

Response: The final plan has desired conditions that ensure timber harvest and related management actions will be designed to be compatible with the Pacific Crest Trail desired conditions for a naturally appearing landscape surrounding the trail (MA-PCT-DC). Site-specific project design and mitigation measures, such as buffers, which would minimize impacts to the Pacific Crest Trail, and scenic values of the trail would be considered during project planning and implementation phases.

8233

Prohibit hauling, landings, or temporary roads within the management area.

Response: Eighty-one miles of the Pacific Crest Trail on the Inyo National Forest is within designated wilderness where timber harvest is prohibited and hauling, landings and temporary roads are prohibited. On the five miles of trail outside of wilderness, hauling, skidding, landings, or temporary roads on the Pacific Crest Trail are prohibited (MA-PCT-STD-04). In the Pacific Crest Trail management area, there are 11.5 miles of existing roads that are open for public travel and it may be appropriate to allow hauling and landings along these roads (chapter 3, Pacific Crest Trail Recreation Opportunity). While temporary roads are not prohibited within the management area, any new temporary road, along with any other management activity, would be designed to meet a high scenic integrity objective (MA-PCT-GDL-01).

8234

Prohibit grazing (suitability) or limit grazing to areas of existing use or phase out.

Response: The final plan does not prohibit grazing within the Pacific Crest Trail management areas. There are no legislative or policy requirements to prohibit grazing along national scenic trails. Most of the Pacific Crest Trail management area on the Inyo National Forest is in designated wilderness. Legislative requirements regarding grazing are found the Wilderness Act of 1964 (section 4(d)(4)(2) "grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." Congressional grazing guidelines issued by the 96th Congress (1979-1981) provide specific direction with regard to open grazing allotments in wilderness. The final plan direction for range includes considering impacts to recreation when designing or locating improvements and structures (RANG-FW-GOAL). The commitment of forage resources to grazing will be assessed and determinations at the project (allotment) level during National Environmental Policy Act analysis.

8235

Minimize the impacts of structures and utilities. No authorizations for wind towers or solar panels.

Response: The final plan outlines desired conditions and other plan components to provide for a naturally appearing landscape that minimizes the impact from development. Within the Pacific Crest Trail corridor, no special-use authorizations for new communication sites and energy generation sites (MA-PCT-SUIT) are allowed. MA-PCT standards and guideline address scenery, structures, utilities, and special uses to provide for a naturally appearing landscape. On the sections of the trail that are within designated wilderness, there is a legislative requirement to prohibit permanent structures and installations.

8236

For Pacific Crest Trail management area outside designated wilderness, MA-Pacific Crest Trail-STD-05, should include the following specific wording: "05 The Pacific Crest Trail Management Corridor is an avoidance area for linear rights-of-way, except in FERC designated transmission corridors, which are available for linear rights-of-way. Cultural landscapes, high potential historic sites, and high potential route segments within or along the Pacific Crest Trail Management Corridor would be excluded from transmission, except in designated transmission corridors. For all linear rights-of-way adversely impacting trail management corridors, the agency will complete an analysis

showing that the development does not substantially interfere with the nature and purposes of the trail and that mitigation results in a net benefit to the trail. Project design and mitigation for utility and rights-of-way projects will be sufficient to protect trail values. Avoidance (the cost of trail relocation), on-site mitigation (including screening, feathering, and other visual management techniques to mitigate visual and other impacts of new or upgraded utility rights-of-way) and off-site mitigation are pursued in that order. Compensation can include acquisition or restoration of corridor RQVs, features, and landscapes, will be at a minimum of 2:1, and must result in a net benefit to the overall trail corridor."

Response: The suggested order of mitigation measures was added to MA-PCT-STD-02 in the final plan. The remaining suggested changes were not made in the final plan for several reasons: 1) the Inyo National Forest does not have any Federal-Energy-Regulatory-Commission-designated transmission corridors that cross or are near the Pacific Crest Trail management area; therefore, this additional direction for linear rights-of-way is not needed; 2) the management direction for cultural landscapes properties and high potential historic sites and route segments is found in the desired conditions and guidelines for desired conditions (CULT-FW) and provides the protection requested; 3) forest plans do not compel or direct any actions and are not prescriptive (for instance, “Compensation will be at a minimum of 2:1” or “limit to a single crossing”) and do not repeat law, regulation, and policy, such as the suggested requirement to “not substantially interfere with the nature and purposes”; 4) the phrase “and all due care has been taken to mitigate impacts." is met through the Council of Environmental Quality regulation 40 CFR 1505.3 (c) in implementing decisions “to state whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not”; and 5) final plan direction (MA-PCT-STD-02) requires that utility and rights-of-way projects be designed and mitigated to protect trail values.

8239

For Pacific Crest Trail management areas outside designated wilderness, this edit to MA-Pacific Crest Trail-GCL-08 is requested: 08 Locate new public utilities and rights-of-way in areas of this management prescription area where impacts already exist. Limit linear utilities and rights-of-way to a single crossing unless additional crossings are documented as the only prudent and feasible alternative and all due care has been taken to mitigate impacts."

Response: See response to comment 8236

8237

For Pacific Crest Trail management areas outside designated wilderness, this addition to MA-Pacific Crest Trail-GDL-04 is requested: "04 Existing roads and trails within the Pacific Crest Trail management area that are available for public motorized travel and designated as forest system roads and trails may remain open for public motor vehicle use. Other federal, state, county or other public roads within the management area available for public motor vehicle use may remain open for motorized travel."

Response: The final plan was updated to clarify the restriction on new road construction (MA-PCT-STD-03) and on the design of designated roads and trails (MA-PCT-GDL-03). The record of decision clarifies that motorized use on authorized roads and trails that occur within the Pacific Crest Trail corridor would be allowed to continue. This use was determined by the 2009 Travel Management decision. Any future opening or closing of a motorized road or trail would be accomplished at the project level and would require site-specific National Environmental Policy Act analysis.

8238

For Pacific Crest Trail management areas outside designated wilderness, this edit to MA-Pacific Crest Trail-GDL-07 is requested: "07 New buildings and structures associated with special uses that would be visible from the Pacific Crest Trail, authorized only when they are found to be the only prudent and feasible alternative to meet an overriding public need, are designed to blend into the natural landscape and be visually subordinate."

Response: The suggestion to add direction to MA-PCT-GDL-07 (in final plan MA-GDL-04) which would authorize structures "only when they are found to be the only prudent and feasible alternative to meet an overriding public need" was not included. The requirement would prohibit fences, water tanks, and other structures that are compatible within the management area for the Pacific Crest Trail. Final plan direction provides constraints on development by managing for "a natural appearing landscape" (MA-PCT-DC-02) and modifying management activities within the corridor to be "consistent with a scenic integrity objective of high" (MA-PCT-GDL-1).

8240

Protect the undeveloped and natural features of the Pacific Crest Trail corridor by prohibiting mineral withdrawal from the Pacific Crest Trail Management Area (suitability)

Response: To protect the undeveloped and natural features of the trail, the Pacific Crest Trail corridor is not suitable for mineral exploration or extraction if it causes surface disturbance (MA-PCT-SUIT). Subsurface withdrawal of minerals, if permitted, would have to meet the plan components for MA-PCT which provides for a "naturally appearing" landscape.

8241

Prohibit road building in the Pacific Crest Trail Corridor.

Response: MA-PCT-STD-03 prohibits new permanent road building within the management area unless required by law to provide access to private lands or documented as the only prudent and feasible alternative. While temporary roads are not prohibited within the management area, any new temporary road, along with any other management activity, would be designed to meet a high scenic integrity objective (MA-PCT-GDL-01). Temporary roads are generally minimum-standard roads designed for short-term use during a specific project or emergency operation not intended to be part of the Inyo National Forest transportation system and not necessary for long-term management (36 CFR 212.1). Projects that propose temporary roads should be designed to be compatible with plan components for the management area.

8242

Prohibit new motorized trails in the Pacific Crest Trail Corridor.

Response: Motorized use along the Pacific Crest Trail is prohibited in Sec 7(c) of the National Trail System Act and by regulation (36 CFR 261.20). The Pacific Crest Trail Comprehensive Management Plan (1982) recognizes the trail crosses a variety of recreation settings and provides additional guidance on the number of motorized crossings based on the recreation opportunity spectrum. New motorized trails may be allowed within the Pacific Crest Trail corridor but should be designed to minimize impacts to the scenic, natural, and experiential values of the trail. (MA-PCT-GDL-03).

8243

Provide a quiet and solitude experience on the Pacific Crest Trail consistent with wilderness

Response: The Pacific Crest Trail Comprehensive Management Plan (1982) recognizes that the trail may cross a variety of recreation settings. The Pacific Crest Trail Corridor provides a predominantly wilderness setting (final environmental impact statement, chapter 3 Environment Consequences Recreation Opportunity) with ninety-four percent of the trail corridor being in designated wilderness.

Outside wilderness, the desired conditions for the trail (MA-PCT-DC) include a recreation experience that is tranquil and consistent with or complements a nonmotorized recreation setting. The semi-primitive nonmotorized setting provides a "near primitive wildland environment." (Pacific Crest Trail Comprehensive Plan 1982).

8245

The plans should mitigate the noise of motorized vehicles (up to ½ mile)

Response: Mitigation of the noise of motorized vehicles could be accomplished through a variety of tactics including, sound barriers, slower speeds of travel, and closure of roads or trails to motorized use. Use of authorized roads and motorized trails was determined by the 2009 Travel Management decision. Closure of roads, changes in speed, or construction of barriers are actions would require project-level analysis.

Since most of the Pacific Crest Trail in the Inyo National Forest travels through designated wilderness, where motorized travel is prohibited, much of the sounds of motorized vehicles are already distant. The Pacific Crest Trail corridor in the final plan is defined by what is seen from ½ mile of centerline of the trail and provides for a desired condition of setting consistent with or complementing the primitive and semi-primitive nonmotorized recreation opportunity (MA-PCT and MA-PCTW). A desired condition for the trail corridor outside of wilderness was added to address sounds from winter motorized use (MA-PCT-DC).

8246

Preserve Pacific Crest Trail for hiking and horseback riding experience.

Response: Provision for the Pacific Crest Trail for hiking and horseback riding is found in 36 CFR section 212.21 which directs that the Pacific Crest Trail be administered primarily as a foot and horseback riding trail. This is further reflected in final plan components (MA-PCT-DC and SUIT).

8247

Provide additional recommended wilderness nearby the Pacific Crest Trail (South Sierra Wilderness Additions - West (1) and (2), and Golden Trout Wilderness Addition

Response: See response to comment 8068. In the preferred alternative, the area portion of the South Sierra Wilderness Additions closest to the Pacific Crest Trail was not recommended. The characteristics of these polygons were detailed in the final environmental impact statement, volume 2, appendix B in both the evaluation narrative and description of the areas analyzed (pages 39, 109, and 173 through 174). The record of decision includes the rationale the forest supervisor used to determine whether to include areas as recommended wilderness in the

preferred alternative or only in alternative C ("Preliminary Administrative Recommendations" section in the record of decision).

8248

Address existing recreation events, roads, communication sites, wind towers, utility lines, buildings, vehicle crossings that conflict with the nature and purposes of the Pacific Crest Trail.

Response: The National Trail System Act allows (Section 7c) for "other uses" to occur along the trail as long as they do not substantially interfere with the nature and purposes of the trail. Since most of the Pacific Crest Trail is within designated wilderness on the Inyo, there are no known conflicts with the nature and purposes of the trail – including recreation events, communication sites, and wind towers. Outside wilderness, the Pacific Crest Trail corridor has 11.5 miles of existing public open roads where use is compatible with the plan management direction (MA-PCT-GDL-03) and the Pacific Crest Trail Comprehensive Management Plan (1982, strategy for second level plans). The plan components within MA-PCT address existing roads and recreation events. There are no existing communication sites, wind towers, utility lines, and buildings within the Pacific Crest Trail corridor. Vehicle crossings would be addressed in project-level travel management planning. MA-PCT plan components also address future development of these types of facilities.

8249

Limit permitting of competitive or large events

Response: Large events have multiple regulations and directives that guide the permitting process. In designated wilderness, where most of the Pacific Crest Trail on the Inyo is located, competitive events are prohibited by policy in Forest Service Manual 2323.13h. Outside wilderness, large events are regulated by 36 CFR 251.54 which requires permits for noncommercial groups of 75 people or more. The forest plan allows existing recreation events to continue; however, new recreation events would be restricted to using only designated crossings of the trail. This would prevent an increase of the use of the trail itself for large events (MA-PCT-GDL-02).

8250

Provide a primitive recreation experience by designating the recreation opportunity spectrum as primitive or semi-primitive non-motorized (including winter).

Response: Ninety-five percent of the Pacific Crest Trail corridor is primitive or semi-primitive nonmotorized recreation opportunity spectrum (final environmental impact statement, chapter 3, Pacific Crest Trail Environmental Consequences –Recreation Opportunity).

The Pacific Crest Trail, because of its length must cross paved roads and developed areas. In those situations, the emphasis is traversing through as quickly as possible. The Comprehensive Management Plan (1982) provides for a range of recreation opportunities across the trail from primitive (primarily found in designated wilderness) to rural and urban where the landscape is culturally modified to the point where it is dominant and the trail is a considered a pass-through area. The desired condition for the trail outside wilderness, MA-PCT-DC-03, is "consistent with or complements a nonmotorized recreation setting" and in winter, the trail would provide a "naturally appearing setting with few to no sights, sounds, and resource impacts from motorized use."

8258

Need to provide travel management direction which supports a primitive nonmotorized trail opportunity.

Response: Travel management for the use of authorized roads and motorized trails was determined by the 2009 Travel Management decision. Any future opening or closing of a motorized road or trail would be accomplished at the project level and would require site-specific analysis as required by the National Environmental Policy Act. See response to comment 8250.

8251

Ensure that impacts of proposed projects will be evaluated from all areas of the Pacific Crest Trail from which the project is viewed.

Response: Within the Pacific Crest Trail corridor (MA-PCT-GDL-01), new management activities should meet a high scenic integrity objective and proposed projects will evaluate what is viewed from the trail (Potential Management Approach).

Outside the Pacific Crest Trail corridor, the desired condition for lands viewed from the trail is "naturally appearing landscapes" that provide panoramic views and landscape connectivity with a minimum scenic integrity objective of moderate. (MA-PCTW-DC and MA-PCT-DC).

Forest plans do not prescribe any specific type of analysis at project scale. However, when reviewing the impacts of proposed projects, the responsible official should determine whether or not any extraordinary circumstances, such as congressionally designated areas are present, and if so, the degree of the potential effects on the listed resources (36 CFR 220.6(b)).

8252

Establish indicators and measures for visitor use capacity, scenic integrity and recreation opportunity spectrum setting thresholds.

Response: Development of indicators and measures is a project-specific planning effort, where the forest plan provides strategic guidance. For example, to address visitor use capacity, the final plan provides a potential management approach that includes minimizing impacts to desired conditions for natural resources and visitor experiences on the Pacific Crest Trail, through education, site management, regulation and enforcement. Specific indicators and measures are project level decisions outside the scope of this plan revision. Visitor use strategies, including capacity, are addressed in the underlying wilderness management plans the Pacific Crest Trail traverses on the Inyo National Forest.

Final plan desired conditions for MA-PCT and MA-PCTW provide for natural appearing landscapes. Scenic integrity objectives and scenic stability levels are maintained to retain panoramic views and landscape connectivity.

Recreation opportunity spectrum does not authorize or establish management actions. A forestwide standard (REC-FW-STD) clarifies that the recreation opportunity spectrum is intended to inform facility and infrastructure design and development.

8253

Need to provide for safe uses and enjoyment of the Pacific Crest Trail by providing structures and facilities which may include bridges, primitive development of water sources for hikers and stock etc.

Response: The forest plan guides the strategic development of the Pacific Crest Trail by outlining desired conditions for the Pacific Crest Trail (MA-PCTW-DC and MA-PCT-DC). Trail planning for water sources and facilities such as bridges is project-level planning.

8254

Provide for better signing of the trail.

Response: Forest Service national trail signing is directed in EM100-15 chapter 5.9 and the Pacific Crest Trail Comprehensive Management Plan, appendix C. Strategies on how to improve provide better signing is project specific.

8255

Promote volunteers and partnerships for conflict resolution between users and stewardship/maintenance of the trail and environmental stewardship education.

Response: The final plan has a suite of plan components that supports these types of partnerships in forestwide direction for volunteers, interpretation, partnerships and stewardship (VIPS-FW). Appendix C of the final plan is titled “A Renewed Partnership Focus for the Inyo National Forest” and details a variety of types of partnerships.

8256

Provide coordination and consistency in management across multiple jurisdictions.

Response: Coordinating management as a single entity across jurisdictions is a core principle of National Forest System trail management and is directed in the National Trail System Act through the Secretary of Agriculture and Interior and their designees. Nationally, Federal land management agencies have a memorandum of understanding (MOU: The National Trails System, 2017). The primary objective of the memorandum of understanding is to develop programs and policies for the national forest trail system and promote consistency in national trail planning, development, administration, management, maintenance, protection, acquisition, identification, certification, and operation. The final plan has multiple goals (VIPS-FW-GOAL) that guide collaboration with other, including other local, State, and Federal agencies. No additional direction within forest plan is needed to address this concern.

8257

Visitor use management of the Pacific Crest Trail should minimize impacts to resources and visitor experiences with the least restrictions as possible to be effective.

Response: Forest plans do not compel or direct any action and are not prescriptive. The suggestion to require visitor use management to use the “least restrictions possible” was not used. While often desirable, it may not be the appropriate management action after project level analysis. The final plan has a potential management approach (MA-PCTW and MA-PCT) that provides a range of visitor use management strategies “to minimize impacts to desired conditions for natural resources and visitor experiences through education, site management, regulation, and enforcement.”

8259

Guidelines for the frequency of Pacific Crest Trail crossings should be added to the list of Standards and Guidelines for Pacific Crest Trail.

Response: Guidance for the number of motorized crossings is found in the Pacific Crest Trail Comprehensive Management Plan, recreation opportunity spectrum (1982). The final plan directs that crossings be designed to "minimize impacts to the scenic, natural, and experiential values of the trail" (MA-PCT-GDL-03). The specific number of crossings would be determined in project level travel management.

8260

Allow for existing mechanized trails and crossings of the Pacific Crest Trail within the management area to continue.

Response: MA-PCT-SUIT-04 provides for the continued use of existing designated roads and trails, including crossings, within the management area. See response to comment 8237.

8262

Prohibit cross-country over-snow vehicle travel within the Pacific Crest Trail management area, except for designated crossing points.

Response: Where the Pacific Crest Trail is in designated wilderness, snowmobiling is prohibited by statute and no crossings are allowed. Outside designated wilderness, motorized travel is not suitable within the Pacific Crest Trail management area year-round (MA-PCT-SUIT-05), except at designated crossings, and on designated roads and trails (MA-PCT-SUIT-04). Within the trail corridor and outside designated wilderness, there are 11.5 miles of road currently open to motorized use in the snow-free season. The final plan provides a desired condition for the trail corridor to be a naturally appearing setting in winter, with few to no sights, sounds, and resource impacts from motorized use. The site-specific planning to determine where over-snow vehicle travel will be allowed will occur in subpart C, travel management planning.

8263

Prohibit motorized/mechanized use. Designate and minimize the number of crossings.

Response: Where the Pacific Crest Trail is in designated wilderness, motorized and mechanized transport is prohibited by statute. Outside designated wilderness, motorized travel is not suitable on the Pacific Crest Trail itself, year-round(MA-PCT-SUIT-05), except at designated crossings, and on designated roads and trails. MA-PCT-SUIT-04 explains that existing authorized roads and trail within the management area PCT corridor are suitable, but then MA-PCT-STD 03 explains that new motorized routes are prohibited unless they are required by law to provide access to private lands, reduce environmental impact, or are the only prudent and feasible option . Project-level planning, such as travel management – subpart C, will determine where motorized use is allowed and designate the number of crossings. Outside wilderness, designated roads and trails within the corridor, including crossings of the Pacific Crest National Scenic Trail, are suitable (MA-PCT-SUIT-04). New recreation events on the Pacific Crest National Scenic Trail should be limited to designated crossings only to minimize conflicts with the nature and purposes of the trail (MA-PCT-GDL-02). See response to comments 8259 and 8263.

8272

Designate crossings and associated widths and corridors that utilize topographic and geologic features and are enforceable

Response: New roads within the corridor, are not permitted unless required by law to provide access to private lands or determined to be prudent and feasible (MA-PCT-GDL-03). Using topography and geologic features to define boundaries is an excellent strategy to ensure recreationists can understand where travel is allowed. The decisions for authorized use of motorized roads and trails are made in site-specific travel management planning (subpart B and C). Outside wilderness, existing designated roads and trails within the corridor, including crossings of the Pacific Crest National Scenic Trail, are suitable (MA-PCT-SUIT-04). New recreation events on the Pacific Crest National Scenic Trail should be limited to existing designated crossings to minimize conflicts with the nature and purposes of the trail (MA-PCT-GDL-02).

8264

Overlapping management direction may conflict and needs to be clearly identified and evaluated (for example, RNA and Wilderness)

Response: On the Inyo National Forest, the Pacific Crest Trail does not have any overlapping direction with research natural areas. Potential conflict between the Pacific Crest Trail management, wilderness and other resource areas has been reviewed by the interdisciplinary team. See response to comments 8243, 8156, 8157, and 8158.

8261

Allow snowshoeing and skiing

Response: There are no regulations that prohibit snowshoeing and skiing on the Pacific Crest Trail. Within the final plan, the desired conditions provide for primitive (MA-PCTW-DC-02) and nonmotorized settings (MA-PCT-DC-03) which are compatible with snowshoeing and skiing.

8265

Provide guideline for trail reconstruction or relocation that enhances recreation experience and protects resources

Response: The final plan provides a potential management approach both within and outside wilderness to reconstruct or relocate existing portions of the Pacific Crest Trail as needed to enhance the recreation experience and protect resources. Evaluate proposed trail relocations using the established Pacific Southwest Region process in partnership with adjoining federal agencies, Pacific Crest Trail Association, and other partners. By policy (Forest Service Manual 2353.43c) a segment of the Pacific Crest Trail may be relocated to preserve the nature and purposes for which the trail was established and to promote sound multiple-use management.

8266

Have a plan objective state that 60 percent or more of the Pacific Crest Trail will meet standard within 10 years.

Response: The final plan has a plan objective (REC-FW-OBJ-03) which strives for 75 percent of the forest designated trail system, including the Pacific Crest Trail, to be maintained to standard within 10 years. Since the Pacific Crest Trail is a national scenic trail designated by Congress, it

is prioritized in terms of maintenance. In the final plan, we did not lower the objective to 60 percent because of this high priority.

8267

Scenic values outside of the management area but still within view of the trail should be protected.

Response: MA-PCTW-DC-04 and MA-PCT-DC-05 provide for scenic values outside the management area but in view of the trail: "Lands viewed beyond the management area meet the scenery integrity objective of at least moderate."

8269

Comply with the National Trails System Act and have a desired condition for the Pacific Crest Trail to provide for all human-powered journeys (bikes, snowshoes, skis).

Response: The National Trail System Act in section 7(j) identifies bicycling as one of the potential trail uses allowed within the national forest trails system. The act does not prescribe that all of the potential uses are allowed on each national trail. Since its inception, the Pacific Crest Trail has been open to foot and horse travel and closed to motorized and mechanized travel. (Pacific Crest Trail Comprehensive Management Plan – appendix C). The final plan maintains the closure. The desired conditions within the Inyo forest plan (MA-PCT and MA-PCTW) is to provide for a nonmotorized setting where skiing and snowshoeing are allowed. See response to comment 8274.

8270

The Pacific Crest Trail Management Area would overly restrict certain types of uses:

Response: The final plan provides for activities and uses of Pacific Crest Trail based on the applicable authorities and the nature and purposes of the trail. Uses and management activities are allowed in the Pacific Crest Trail corridor (designated area) to the extent that these uses are in harmony with the purpose for which the trail was designated. (Forest Service Handbook 1909.12 24.2). Within designated wilderness (MA-PCTW), the uses allowed reflect wilderness management direction and legislative requirements. There are no additional restrictions of use within wilderness based on the Pacific Crest Trail corridor.

Outside designated wilderness (MA-PCT-SUIT), special-use authorizations for new communication sites, energy generation sites, and mineral exploration or extraction (surface disturbance) are prohibited to protect scenic values of the trail. Prohibition of year-round motorized or mechanized transport (except at designated crossings, on interim routes, and on designated roads and trails) continues existing closures. Plan components within MA-PCT provide desired conditions and direction to protect the scenic, natural, and experiential resource qualities of the trail.

Activities that are prohibited conflict with the desired conditions for the trail and could substantially impact the nature and purposes of the trail. There are 2,455 acres in the Pacific Crest Trail corridor outside wilderness which is 0.1 percent of the Inyo National Forest. While there are some changes in use that will occur, there is opportunity outside the management area to provide for other uses.

Uses allowed within the Pacific Crest Trail corridor include vegetation management, prescribed burning and fire suppression, grazing, leasable minerals (no surface occupancy), and utility

projects. Use of authorized roads and trails that are open to motorized and mechanized use may continue.

8271

Year-around motorized use (off highway vehicle and over-the-snow) is overly restricted in the Pacific Crest Trail Corridor.

Response: The forest plan revision does not make any project level or site specific travel management decisions. Motorized use may be allowed in the Pacific Crest Trail corridor outside of designated wilderness at designated crossings, and on designated roads and trails (MA-PCT-SUIT-04). During a project-level analysis, subpart C of the Travel Management Rule, we will determine where winter motorized uses are authorized.

Motorized use on the Pacific Crest Trail is prohibited by regulation in both winter and snow-free seasons (CFR 36 section 261.20). Motorized use is prohibited within designated wilderness.

8273

The Pacific Crest Trail Corridor is overly restrictive for winter conditions.

Response: See response to comment 8271.

8274

The Pacific Crest Trail Corridor is overly restrictive for mechanized use

Response: Where the Pacific Crest Trail is in designated wilderness, mechanized transport is prohibited by statute. No changes regarding existing mechanized use on the Pacific Crest National Scenic Trail are being made under the current forest plan revision. Regional Order 88-4 currently prohibits using or possessing bicycles on the Pacific Crest National Scenic Trail along the entire length of the trail.

Outside designated wilderness, in the Pacific Crest Trail Corridor, mechanized transport is allowed at designated crossings and on designated roads and trails (MA-PCT-SUIT-04). See response to comment 4202.

8275

Vegetation management is overly restricted in the Pacific Crest Trail Corridor.

Response: MA-PCT allows for vegetation management (Potential Management Approach) where it meets the desired conditions of the management area. The Pacific Crest Trail corridor is suitable for timber production because timber harvest and related management actions would be designed to be compatible with the Pacific Crest Trail desired conditions for a naturally appearing landscape surrounding the trail (final environmental impact statement chapter 3, Pacific Crest Trail Vegetation Management and Fuels Treatment).

8276

Hunting and Fishing is overly restricted in the Pacific Crest Trail Corridor.

Response: Hunting and fishing are allowable uses in both Pacific Crest Trail management areas (MA-PCT and MA-PCTW). There are no proposed changes or restrictions.

8278

Recreation Events outside of Wilderness should not be restricted in the Pacific Crest Trail Corridor.

Response: MA-PCT-GDL-02 provides the opportunity for existing recreation events outside wilderness to continue at current levels but restricts new recreation events to only use designated crossings and not the trail itself. There would be no displacement of existing permittees. The National Trails System Act allows "other uses" along the trail as long as they do not substantially interfere with the nature and purposes of the trail. With increased visitor use in the southern Sierra, the five miles of the Pacific Crest Trail outside wilderness are closed to new recreation events to prevent conflict with long-distance hikers and equestrians who are the primary users. The remaining 587 miles of trail outside of designated wilderness would potentially be available for that opportunity (final environmental impact statement, Pacific Crest Trail, Recreation Events Consequences).

8279

The Pacific Crest Trail Corridor is overly restricting opportunities in roaded natural or semi-primitive motorized recreation opportunity spectrum locations.

Response: Recreation opportunity spectrum classes are not regulatory and are not intended to prohibit specific uses purely through recreation opportunity spectrum designation. In the final plan, the recreation opportunity spectrum will be used for decisions on facility and infrastructure design and development. (REC-FW-STD). The desired condition for the Pacific Crest Trail corridor outside wilderness (MA-PCT-DC) is a setting that is consistent with or complements a nonmotorized recreation setting. The trail may intermittently pass through more developed settings (including roaded natural or semi-primitive) to provide a continuous route. In the final plan (Pacific Crest Trail corridor), there were no changes or additional restrictions based on the recreation opportunity spectrum. MA-PCT-SUIT-04 allows continued use of designated roads and trails, including crossings. See response to comments 8328 and 8324.

8284

The forest plan does not provide opportunities for multiple use recreation (change in recreation opportunity spectrum for RN and SPM)

Response: The final plan (REC-FW-DC) has several desired condition statements regarding the recreation setting and range of recreation activities - which includes multiple use recreation See response to comment 8279 for plan components within the Pacific Crest Trail corridor in roaded natural (RN) or semi-primitive motorized (SPM) locations.

8280

Develop a new alternative that establishes a MA corridor with Primitive or Semi-Primitive non-motorized characteristics.

Response: A new alternative in the final environmental impact statement was not developed based on recreation opportunity spectrum. The selected alternative (alternative B-modified) meets this suggestion since nearly all (95 percent) of the Pacific Crest Trail management area falls within either the primitive or semi-primitive nonmotorized recreation opportunity spectrum. The final plan also has direction for the remaining area outside designated wilderness to have a recreation experience that is consistent with or complements a nonmotorized setting (MA-PCT-GDL-03).

8281

The draft environmental impact statement should use quotes from the Pacific Crest Trail comprehensive management plan regarding multiple use.

Response: The final environmental impact statement Pacific Crest Trail background information was updated to use a quote from section 7(a) of the National Trails System Act (which is also in the Pacific Crest Trail Comprehensive Management Plan) regarding multiple-use.

8282

The draft environmental impact statement Pacific Crest Trail management area analysis is flawed and should reanalyze the need for more multiple use recreation in relation to the proposed Pacific Crest Trail Corridor.

The final environmental impact statement must consider that the Pacific Crest Trail Corridor would restrict all other forms or recreation in the same way as the Primitive recreation opportunity spectrum.

Response: An analysis assumption within the "Sustainable Recreation" section of the final environmental impact statement acknowledges the need for more multiple use by the statement "Recreation demand is increasing." The final environmental impact statement analyzes the effects of each alternative on recreation setting and opportunities across the entire Inyo National Forest and alternative B-modified specifically seeks to meet visitor expectations and demand by providing a variety of year-round recreation opportunities that are both motorized and nonmotorized (final environmental impact statement-chapter 3 Sustainable Recreation, Recreation Opportunities, Consequences). The relationship with different forms of multiple use recreation is considered in the final environmental impact statement, chapter 3, Pacific Crest Trail, Recreation Opportunity and Visitor Use, "Environmental and Cumulative Consequences" section.

The different types or forms of recreation can be divided broadly into four categories – motorized, mechanized (bicycle), and foot and horse travel. There are no restrictions on foot and horse travel considered in the Pacific Crest Trail corridor. The final plan allows for motorized and mechanized use on authorized roads and trails to continue in the Pacific Crest Trail corridor (MA-PCT-SUIT-04), while regulations prohibit motorized use on the trail itself (CFR 36 section 261.20), which is echoed in the final plan (MA-PCT-SUIT-05).

The 2009 travel management decision determined authorized roads and motorized trails on the Inyo National Forest. Any future opening or closing of a motorized road or trail would be accomplished at the project level and would require site-specific analysis.

Responses to Comments 8270, 8271, 8273, 8276, 8278, and 8279 also discuss a variety of recreation activities and the relationship to the final plan and final environmental impact statement analysis.

8283

The analysis of the Pacific Crest Trail management area did not adequately analyze the impacts on future opportunities of certain types of uses.

Response: The cumulative impact analysis in the final environmental impact statement considers the effects of past, present, and future (reasonably foreseeable) actions on recreation opportunity, visitor use, competitive events, vegetation management, fuels treatment, and lands special uses within the Pacific Crest Trail corridor. The cumulative impacts analysis has been expanded to

specifically reference motorized and nonmotorized recreation within the recreation opportunity section.

8285

Future Pacific Crest Trail relocations are unknown and the draft environmental impact statement has not considered these impacts.

Response: Relocations of the Pacific Crest Trail are project-level decisions that are outside the scope of the forest plan. Forest Service Manual 2353.04g (3)b6 provides direction on relocation of national scenic trails. Since there are no trail relocations being proposed, there are no reasonably foreseeable cumulative impacts from relocation to analyze in the final environmental impact statement.

8286

Impacts of the variable width corridor should be disclosed

Response: One of the analysis assumptions within the final environmental impact statement is that more acres within the Pacific Crest Trail management area results in more protection of resources, qualities, and values and associated settings of the trail. The width of each management area alternative is described in final environmental impact statement, Pacific Crest Trail, Methods. The final environmental impact statement, Pacific Crest Trail Corridor, “Environmental Consequences” section describes consequences of the variable corridor widths across alternatives.

8287

Economic value of off-highway vehicle recreation should be in the analysis.

Response: The economic value of off-highway vehicle recreation is documented in the final environmental impact statement “Economic Conditions” section - Important Inyo National Forest Contributions to Inyo County. Since the forest plan does not make any project-level travel management decisions and existing roads and trails within the management area that are open to public use will remain open, there is no anticipated change in off-highway vehicle economic benefits.

8288

The draft environmental impact statement should only examine local issues and narrow the cumulative impacts analysis to the Pacific Crest Trail within the three forest areas and not consider regional or national issues.

Response: The final environmental impact statement analysis area considers local, regional and national scales based on the unique and distinctive role and contributions of the trail (Forest Service Handbook 1909.12 22.32 3(f). The Pacific Crest Trail is one of eleven national scenic trails designed by Congress as part of a national trail system. The trail plays a distinct role as the only national scenic trail in California and Oregon and provides long-distance travel opportunity across California, Oregon, and Washington for travelers from all fifty states and abroad.

Motorized Recreation

8289

Designation of additional wilderness, wild and scenic rivers and the proposed Pacific Crest Trail corridor has a cumulative effect that reduces access and opportunities for motorized recreation, therefore, do not adopt a plan that further restricts motorized recreational opportunities.

Response: The wilderness evaluation appendix of the final environmental impact statement (volume 2, appendix B) explains that all motorized roads were excluded from the recommended wilderness polygons being analyzed in alternatives B, B-modified, and C; therefore, there would not be a reduction in the use of motorized roads due to recommended wilderness. There are no authorized motorized roads or trails within recommended wilderness in any of the alternatives. Unauthorized routes may exist under alternatives B, B-modified, and C. The effects of recommended wilderness on motorized opportunities was analyzed in the final environmental impact statement for those polygons being recommended as wilderness (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Wilderness" section).

Management direction in the final plan for eligible wild and scenic rivers follows interim direction provided in chapter 80 of the Forest Service Handbook 1909.12. This direction for motorized travel states, "Wild Rivers. Motorized travel on land or water may be permitted, but is generally not compatible with this classification. Where motorized travel options are deemed to be necessary, such uses should be carefully defined and impacts mitigated."

There are no authorized motorized roads or trails along wild segments of eligible rivers on Inyo National Forest (final environmental impact statement, volume 2, appendix C).

Scenic and recreational rivers – Motorized travel on land or water may be permitted, prohibited, or restricted to protect the river values.

Any actions to prohibit or restrict motorized travel along these segments of wild and scenic eligible rivers would be determined at the project-level and not within this planning process. Effects of motorized travel along these segments is analyzed in the final environmental impact statement (volume 1, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, Eligible and Suitable Wild and Scenic Rivers).

On the Inyo National Forest, only about 8 miles of the Pacific Crest Trail corridor occur outside of designated wilderness. Within these areas, use of designated roads and trails would not be prohibited, reduced, or restricted, within the Pacific Crest Trail Corridor (MA-PCT-SUIT-04).

8290

If there are restrictions, incorporate negative impacts on local economy of reduced motorized recreation

Response: No currently designated motorized routes are included in the recommended wilderness, wild and scenic river areas, or in the Pacific Crest Trail corridor.

8291

Restricts ability of people with limited mobility to use motorized vehicles to access areas.

Response: No currently designated motorized routes are included in the recommended wilderness, wild and scenic river areas or in the proposed Pacific Crest Trail corridor. Therefore access for those with limited mobility using motorized vehicles would not change. Mechanized transportation using indoor wheelchairs is allowed in wilderness for persons who would normally use these as a mode of transportation.

8292

Restricts Tribal access

Response: Since areas with roads or trails authorized for vehicles were excluded from areas recommended for wilderness designation in any of the alternatives in the final environmental impact statement, current vehicle access would not change (final environmental impact statement chapter 2, Alternatives Considered but Eliminated from Detailed Study; Alternatives Eliminated 2). There are no regulations or access restrictions preventing non-commercial traditional Native American plant or fungi harvest within any Inyo National Forest wilderness areas.

8293

Inherent bias against motorized recreation in the environmental impact statement and plan development

Response: The plan includes direction for the continuance of motorized recreation uses in several areas, including: REC-FW-DC 01, 03, and 11; REC-FW-GOAL 03; and MA-DRA-DC 05. The plan does not prohibit motorized uses along authorized roads or trails.

In response to this comment, the final environmental impact statement analysis was improved, as effects to motorized recreation opportunities were analyzed in the “Sustainable Recreation and Scenery” section of chapter 3, revision topic 3.

8294

Lack of acknowledgement of the importance/prevalence of motorized recreation and lack of collection of use data to show its importance.

Response: In response to this comment, the analysis in the final environmental impact statement was improved, as a description of the motorized uses, and prevalence of those uses, was included in the “Affected Environment” section within the “Sustainable Recreation and Scenery” section of chapter 3: revision topic 3.

8295

Consider the combined cumulative effects of all other actions that result in loss of motorized access and motorized recreational opportunities in the state.

Response: See response to comment 8289.

The cumulative effects section of the final environmental impact statement addresses the result of effects of all the new management direction for motorized uses within the administrative boundary for the Inyo National Forest (final environmental impact statement, volume 1, chapter

3, revision topic 3: Sustainable Recreation and Designated Areas, "Sustainable Recreation" section).

8296

Motorized recreation is under represented in the plans for how prevalent it is, therefore, the plans should propose additional areas that provide motorized recreational opportunities.

Response: Trails, roads and areas open to motorized travel are analyzed and designated during travel management planning (Travel Management Rule, 36 CFR Part 212, subpart B), which we completed in 2009. Modifications to the designated system of motorized trails, roads, and open areas are project-level decisions and site-specific analysis would be required to determine if an area is open or closed to motorized use. Forest-level planning does not prohibit or permit specific activities, so travel management decisions are outside the plan revision process.

8297

The plan needs to include more details on how over-snow vehicles use will be managed, including road plowing to allow access to snow areas.

Response: We will complete a more detailed decision on over-snow vehicles management under the Travel Management Rule (36 CFR 212 Subpart C) after the plan revision process. The plan does include a winter recreation opportunity spectrum map that will be used when conducting over-snow vehicles planning.

8298

The plans should restrict motorized access further due to user conflicts and noise, therefore, please consider designating single use trails.

Response: See response to comment 8296.

In addition, any designation of single-use trails would occur at the project level and not within this planning process. The plan does not include any language that would prohibit the designation of single-use trails on the Inyo.

8299

Plans should incorporate "non-motorized" recreation designation to lands outside of wilderness.

Response: Nonmotorized recreation is addressed in the recreation opportunity spectrum classes which are required by the 2012 Planning Rule (chapter 2, Sustainable Recreation) and appendix A. These nonmotorized settings would be primitive and semi-primitive nonmotorized classes. Lands outside wilderness would also have limited motorized access (road density and development scale) in inventoried roadless areas that are in semi-primitive motorized class.

8300

Need plan components for protecting and mitigating damage to engineered system trail infrastructure during any project activity, including pre- or post-fire treatments. Analyze how the activity might impact motorized use on designated roads, trails, and areas

Response: The National Environmental Policy Act and agency direction requires that the impact to recreation be identified and analyzed in project-level planning. Forest plans would not repeat laws, regulation, or policy.

8301

The 'system trails' in each Forest are a major component of the infrastructure that allows the public and agency managers to access the forests for a wide variety of uses. Overall this includes hundreds of miles of constructed trail tread and related structures for stability and drainage, as well as information installations, trailheads, water sources, water crossings to protect riparian resources and public safety. Yet the trails system is not addressed in the infrastructure section. This is in contrast to roads and what seem to be developed recreation sites which are addressed in this section. This is a major oversight and needs to be rectified, including the desired condition statement for this important system.

Response: Trails are considered under sustainable recreation, chapter 2, Desired Conditions Forestwide (REC-FW-DC) and by recreation management area, chapter 3.

8302

Improve existing recreation sites to allow for more users and limit use in those areas where capacity is reached and resource damage is occurring.

Response: The forestwide sustainable recreation final plan desired conditions and guidelines provide the framework for how we will improve, manage, and limit existing recreation sites (REC-FW-DC-04,06) and (REC-FW-GDL-01-03), along with a potential management approach for redesigning, restoring, and rehabilitating sites if unacceptable resource impacts are occurring.

8303

Proposed wilderness (and other unnamed plan components) additions would close existing roads and motorized trails and restrict access for recreation.

Response: No open National Forest System roads or motorized trails are being closed through the forest plan revision process in any of the alternatives. There are no open roads or motorized trails included in any recommended wilderness polygon in any alternative; therefore, access for recreation will not be restricted.

8304

Need to add new trails tailored for aging population that is growing.

Response: The forestwide sustainable recreation plan components for desired conditions and goals address the need for recreation facilities that are accessible and accommodate diverse cultures (REC-FW-DC-02, 05, 12, and 13), as well as providing accessible trails for individuals with mobility impairments (REC-GOAL-08).

8305

Reduce restrictions on (motorized) access in general across all forests.

Response: See response to comment 8296.

8306

Reduce restrictions on (motorized) access for the benefit of those with limited mobility.

Response: See response to comment 8306.

Additionally, forest plans do not authorize specific roads or trails as motorized or nonmotorized. The designation of the motorized system of roads and trails on the Inyo was completed in 2009

during travel management planning (Travel Management Rule, 36 CFR Part 212, subpart B). Any changes to this decision would occur through project-level, site-specific analysis.

8308

It is of utmost importance to many of us that off-highway vehicle areas be maintained and not restricted where existing roads are already in use.

Response: See response to comment 8296.

8310

There needs to be adequate signage, road maintenance and patrolling to prevent open routes from expanding as riders detour around bad spots and pioneer new routes.

Response: Forest Service direction in manuals and handbooks provide instruction on how to manage motorized use (Forest Service Handbook 2309.18, Trails 13.3). Forest plans do not repeat law, regulation, or policy.

8311

The plan should emphasize the importance of establishing and maintaining loop trails for off-highway vehicle users rather than only out and back trails.

Response: The forestwide sustainable recreation final plan components for desired conditions and goals address the need for recreation facilities (including trails) that improve the transportation system and provide a variety of motorized and nonmotorized opportunities: REC-FW-DC-11-13 and REC-FW-03.

8312

The plan should consider maintaining and expanding off-highway vehicle dispersed use and dispersed campsites on the forest in order to reduce the concentration of impacts. When these campsites are closed, they should be replaced on a 1 for 1 basis in another area of the forest.

Response: Roads and trails open to motorized travel are analyzed and designated during travel management planning (Travel Management Rule, 36 CFR Part 212, subpart B), which we completed in 2009. These roads and trails access dispersed camping opportunities on the Inyo, most of which is open to dispersed camping. Dispersed camping closures would be determined through project-level planning (requiring site-specific analysis). During project-level planning, impacts to resources are identified and alternatives to reduce impacts are studied and analyzed. Forest plans do not compel or direct any action.

8313

Consider all options before deciding to close access to motorized trails. These closures impose costs on users who have to travel to alternate (typically more distant) use sites.

Response: See response to comment 8296.

8314

Motorized trails do not negatively impact scenery and should be considered part of the natural landscape and evaluated equally with non-motorized trails when evaluating scenery effects of trails.

Response: The elements of design such as line, contrast, color, and texture in context of the desired setting would be used to determine the impact of any trail on the scenery resource. Built features, such as roads and trails, can be considered assets depending on context of the landscape and the level of disruption to natural features in less-developed settings. Human-made features are never natural features but are not always a negative impact.

8315

The decision must take into account motorized designations serve many recreation activities, not just recreational trail riding

Response: See response to comments 8312 and 8296.

8316

Please do not use "maintenance" as your excuse to limit motorized access. Before you spend money maintaining level 2 roads you should contact us and we will help you eliminate the costs. This also applies to your paperwork such as the Travel Analysis Report (TAR). Before you make up a report that says 800 roads are likely not needed, contact us. Partner with your users before you waste your time making such a report. Partnership means to work together. [Also noted in Inyo]

Response: Under subpart A of the Travel Management Rule (Administration of the Forest Transportation System) every national forest in Region 5 was required to recommend the minimum system of roads and trails to manage the national forest; the product was a travel analysis report. Maintenance was one of many metrics brought into the analysis. The final Inyo travel analysis report (2016) has recommendations to be considered in future National Environmental Policy Act decisions and projects but is not a decision to take action in and of itself.

For maintenance of the national forest system of roads and trails (which were designated in 2009, under subpart B of the Travel Management Rule), we will increasingly depend on partnerships to accomplish work, including maintenance of roads and trails. The “Volunteers, Interpretation, Partnerships and Stewardship” section of the plan address the need to partner to improve recreation opportunities on the Inyo (VIPS-FW-DC-01, 02, and 07).

8317

Please remember that Green Sticker and other off-highway vehicle fees and funds greatly contribute to the cost to maintain off-highway vehicle trails and roads. These funds are not to be used to close roads as has been done in the past.

Response: The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division (OHMVR Division) has a grants and cooperative agreements program (Grants Program) that provides for well-managed, off-highway vehicle recreation in the State of California by providing financial assistance to Federal agencies to manage off-highway vehicle recreation. Restoration (closure of roads as well as restoration of roads that have incurred illegal ingress or egress) is one of the main grant categories. These grants are funded by fuel tax revenue, off-highway vehicle registration fees (Green Sticker Program) and fees collected at State

vehicular recreation areas (California Off-highway Motor Vehicle Recreation http://ohv.parks.ca.gov/) The OHMVR Division makes all funding and grant award decisions.

8318

Inyo National Forest (strengthen the Draft Inyo Forest Plan) The use of off-highway vehicles should be limited and not encouraged in the forests due to their air and noise pollution, and habitat destruction/road erosion.

Response: The Forest Service has a multiple-use mission. The sustainable recreation forestwide direction incorporated into the final plan describes the desired condition of year-round recreation opportunities including designing and maintaining a designated system of roads, trails, and areas that provide a variety of motorized and nonmotorized recreation experiences at varying level of difficulty. Roads and trails open to motorized travel were analyzed and designated in 2009 under the Travel Management Rule (36 CFR Part 212, subpart B). This includes roads used as a transportation system to go from place to place. Off-highway vehicle recreation, like all other appropriate recreational activities, needs to be managed. Sustainable recreation forestwide plan guidelines (chapter 2, REC-FW-GDL -01, 03) describe managing recreation uses adaptively to prevent impacts to other resources and recreation settings. A potential management strategy also directs us to seek collaborative input on sustainable recreation opportunities to address potential conflicts between activities and any resource impacts that may be of concern.

8319

Inyo National Forest. The Plan Revisions do not address the need to re-open roads and motorized trails that should not have been closed. Large volumes of roads, trails, and areas were arbitrarily closed to motorized vehicles and should be reopened. The Forest Service is not addressing this problem.

Response: The Travel Management Rule (36 CFR 212, subpart B, Designation of Roads, Trails, and Areas for Motor Vehicle Use) required us to designate a system of motorized roads and trails. In 2009, we designated the Inyo's system of motorized roads and trails and amended the 1988 forest plan. Any future opening or closing of a motorized road or trail would be accomplished at the project level and would require site specific analysis per the National Environmental Policy Act. Since 2009, we have prepared multiple environmental assessments and signed the accompanying decisions which added mileage and subtracted mileage to the designated system of motorized roads and trails, to improve upon the original 2009 travel management decision. We will continue to look at opportunities to improve the designated system of motorized roads and trails.

8320

Inyo National Forest Opening up roadless for off-highway vehicles is terrible. No expansion of off-highway vehicle use in any of the Forests is called for. There are already lots and lots of acres of public land set aside for this single use.

Response: See response to comment 8318.

Additionally: In the 2009 Travel Management Rule (36 CFR 212) subpart B decision, the existing roads in inventoried roadless areas were already on the national forest road system for the Inyo, as they existed prior to the "Clinton Roadless Rule", implemented in 2001. No additional roads were added to the system of designated roads and trails in inventoried roadless areas in the 2009 decision. Some existing motorized trails in inventoried roadless areas were added to the system as they were found to be appropriate, while many other motorized trails in inventoried roadless areas

were removed from the system as they were determined to be unnecessary, duplicative, or causing resource damage or threats to natural and cultural resources.

8321

Inyo National Forest There is an expanding need to have motorized access. The Draft Travel Analysis Report claimed to be in conjunction with the forest plan Revision. That Report claimed there are approx. 800 roads likely not needed in the Inyo National Forest but did not address any roads that should be added. Many roads that were closed (on paper) in the past are still in use today. The data is inaccurate. This is largely due to user desirability and lack of signage. Instead of spending time and money trying to close roads the Forest should work with partners to mitigate any negative consequences when possible and re-open these roads.

Response: The travel analysis report (subpart A of the Travel Management Rule, 36 CFR 212) was not accomplished in conjunction with forest plan revision. The travel analysis process was a separate process we were responsible for completing by 2016. In the travel analysis process, staff on each national forest recommended a minimum system of motorized roads and trails necessary for management of the national forest. The minimum road and trail system was documented in the travel analysis report. The report was a forest supervisor recommendation; it was not a decision to close roads. There are no implementation actions associated with travel analysis report. Any changes to our designated motorized road system (opening or closing roads and trails) requires project-level analysis per the National Environmental Policy Act to amend the designated system.

We recognize the data used for the travel analysis process was not 100 percent accurate. As we review data, we do our best to correct any inaccuracies.

The Inyo National Forest sustainable recreation forestwide plan components and potential management approaches (REC-FW-DC, REC-FW-OBJ, REC-FW-GOAL, REC-FW-GDL) and the “Volunteers, Interpretation, Partnership and Stewardship” section that has been incorporated into the final plan (VIPS-FW-DC). (VIPS-FW-GOAL) address the need for partnership assistance in managing a variety of recreation facilities, including roads.

8322

Balanced Approach to Recreation Uses

I urge you to ensure that off-highway vehicle use is also considered to be of utmost importance. The Draft Inyo Forest Plan needs to be balanced with off-highway vehicle use, mountain biking, snowmobiling, rock hounding to provide full access to everyone.

Response: The Forest Service has a multiple-use mission and this includes a various types of recreation activities. The forestwide direction incorporated into the final plan (REC-FW-DC, REC-FW-OBJ, and REC-FW-GOAL) describes the desired condition of year-round recreation opportunities, including designing and maintaining a designated system of roads, trails, and areas that provide a variety of motorized and nonmotorized recreation experiences at varying levels of difficulty. This includes off-highway vehicle use, mountain biking, snowmobiling, rock hounding and many other activities, to provide access to the public for a variety of activities. Appropriate recreational activities, need to be managed. Sustainable recreation forestwide plan guidelines (REC-FW-GDL) describe managing recreation uses adaptively to prevent impacts to other resources and recreation settings. Guidelines also direct us to seek collaborative input on

sustainable recreation opportunities to address potential conflicts between activities and any resource impacts that may be of concern.

8323

Contributions from off-highway vehicle use and volunteering

The off-highway vehicle community continues to contribute to the community by providing free trail / road maintenance regularly. Many (hundreds per week) of us come from outside the area specifically to enjoy the Inyo National Forest off-highway vehicle access, Thus, spending considerable money in the community on food, lodging, supplies contributing to the economy of the area.

Response: In response to this comment, information was added into the "Economic Conditions" section of the final environmental impact statement (chapter 3: "Benefits to People and Communities" section). This additional information recognized the tourism contribution of the motorized recreation opportunities on the Inyo, as well as the volunteer contributions to our management of the national forest road system.

8324

The draft plans lack descriptions of the characteristics of different recreation opportunity spectrum settings and, other than some desired conditions, lack the other required plan components (objectives, standards and guidelines) to achieve the desired recreation opportunity spectrum condition in violation of (National Forest Manual) the 2012 planning rule. (Refer to Sierra Forest Legacy letter (32795) and to Friends of the Inyo letter (32765) for specific plan component suggestions.)

Response: The descriptions found in the draft environmental impact statement were broad, conceptual descriptions of the various categories, based on descriptions in the USDA Forest Service Recreation Opportunity Spectrum User's Guide (1987) and Field Guide (1990). The recreation opportunity spectrum does not accept or prohibit specific activities; it describes expectations for settings and management.

The final plan contains tables describing the acres within each recreation opportunity spectrum class across the Inyo ("Social and Economic Sustainability and Multiple Uses" section in chapter 2) and within each recreation management zone ("Sustainable Recreation Management Areas" section in chapter 3). The glossary provides definitions for each of the recreation opportunity spectrum classes (final plan, Glossary). Sustainable recreation plan components are included in the final plan, providing standards and guidelines for managing recreation both at the forest level and in different recreation zones (final plan, chapter 2 "Sustainable Recreation" section and chapter 3, Sustainable Recreation Management Areas). Specific restrictions, regulations, or permitting of various uses within any given recreation opportunity spectrum class may also be used to manage the recreational experience and activities, prevent conflicts or to protect other resources in an area, regardless of recreation opportunity spectrum class.

Also see response to comment 8325.

8325

The draft plans violate National Forest Manual (the 2012 planning rule) because they do not include plan components, including standards and guidelines to provide for sustainable recreation. (recommendation that the Inyo, Sierra, and Sequoia should incorporate the recreation opportunity spectrum setting characteristics and plan component examples developed by the Washington Office and use them as tools for

creating plan components based on recreation opportunity spectrum classes (for summer and winter).

Response: The 2012 Planning Rule (36 CFR 219.7(c)(2)(v)) requires the Forest Service to include plan components, including standards and guidelines to provide for sustainable recreation. Sustainable recreation plan components have been incorporated into the final plan, including forestwide desired conditions (REC-FW-DC), objectives (REC-FW-OBJ), goals (REC-FW-GOAL), guidelines (REC-FW-GDL), and potential management approaches that provide for a variety of recreational opportunities on the Inyo National Forest. Additionally, three recreation management areas have been zoned across the landscape to integrate components of recreation opportunity spectrum classes, both summer and winter. The final plan includes recreation opportunity spectrum mapping for both summer and winter, which are desired conditions. This includes the setting characteristics table.

8326

There are no plan components for recreation opportunity spectrum to direct future management, which makes analysis of impacts inadequate.

Response: The plan includes the following direction for recreation opportunity spectrum:

> REC-FW-STD 01 The recreation opportunity spectrum will be used for decisions on facility and infrastructure design and development.

Within the final environmental impact statement, recreation opportunity spectrum is used as an indicator for recreation settings. An effects analysis was conducted for each alternative to determine how the alternatives would impact recreation settings (chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Sustainable Recreation” section).

Also see response to comments 8324 and 8325.

8327

The recreation opportunity spectrum categories listed on page 463 of the draft environmental impact statement don’t seem to represent differences in uses which is confusing. (A table that lists acceptable activities for each class should be included so differences in use are clear.)

Response: See response to comments 8324 and 8325.

The draft plans fail to ensure that the recreation opportunity spectrum is enforceable in site-specific projects and planning.

Response: Sustainable recreation plan components have been incorporated into the final plan, including forestwide desired conditions (REC-FW-DC), objectives (REC-FW-OBJ), goals (REC-FW-GOAL), guidelines (REC-FW-GDL), and potential management approaches that provide for a variety of recreational opportunities on the Inyo National Forest. These provide desired conditions goals, standards and guidelines for managing various recreation zones on the Inyo. Desired conditions for setting and recreational experience, as described in the recreation opportunity spectrum, will be met using these standards and guidelines as well as potential management approaches for the various areas. Project-specific planning will consider the recreation opportunity spectrum desired settings and the sustainable recreation plan components in determining the appropriate levels of development for infrastructure, special use permitting, vegetation management, and other activities.

8328

The draft plans fail to define specific uses within various recreation opportunity spectrum classes, in particular, provisions for mountain biking. (The recreation opportunity spectrum classes should be further defined to specifically include a clear provision allowing mechanized use in all of the recreation opportunity spectrum classes including primitive and semi-primitive nonmotorized.)

Response: Recreation opportunity spectrum classes are not regulatory and are not intended to prohibit specific uses purely through recreation opportunity spectrum designation. The primitive recreation opportunity spectrum class is generally assigned to areas such as wilderness or recommended wilderness that already have specific prohibitions or policies on mechanized uses, including bicycles. However, bicycle use in other areas in the primitive class may be allowed. Typically, nonmotorized, mechanized uses would be consistent with the semi-primitive nonmotorized recreation opportunity spectrum, unless other designations and regulations apply to that area. This has been clarified in the final plan in the "Sustainable Recreation" section. The glossary has definitions of each recreation opportunity spectrum class and what types of access (motorized and nonmotorized) typically occurs in the specific recreation opportunity spectrum class.

Also see response to comment 8324.

8329

The draft plans strive to align recreation management actions with the recreation opportunity spectrum; for example, there are desired conditions for Wilderness and Wild and Scenic Rivers and many plan components related to recreation. However, there appears to be little integration between management actions such as riparian conservation areas, range, timber, and fire management with sustainable recreation.

Response: Recreation direction is found in several sections of the plan, including riparian conservation areas (MA-RCA-STD 07), in which the standards set for trampling may not be met within the destination recreation areas and community wildfire protection zone, where destination recreation areas overlap this zone, so management direction for reducing fire risk is emphasized. Although the plan may not include specific language for recreation within each section, integration of the plan components would also occur at the project-level when site-specific issues are being addressed.

8330

The recreation opportunity spectrum is vague about how some popular sports (climbing, skiing, biking, hiking, and camping) will be managed in conjunction with the competing demands of other multiple uses in the forests. (Consider establishing "standing coordinating committees" composed of public members and groups, to discuss differing management policies, integrate recreation and other multiple uses, and resolve conflicts in an open forum.) (The Inyo National Forest and County would both be well served to thoroughly vet recreation opportunity spectrum alternatives with communities, perhaps through specific outreach to the County's Regional Planning Advisory Committees, and define the relationship of the recreation opportunity spectrum tool to requests for recreation activity inventories, which have been requested by the Town of Mammoth Lakes and Mammoth Lakes Recreation. These are

key discussions in setting the landscape for recreation opportunities and activities into the future and should not be treated superficially as they have to date.)

Response: Recreation opportunity spectrum describes settings and character of areas as it relates to recreational experience and infrastructure, and does not specifically restrict activities. When recreation or resource conflicts occur, potential management strategies could include regulatory actions that affect specific activities.

The final plan "Sustainable Recreation" section has plan components: forestwide desired conditions (REC-FW-DC), objectives (REC-FW-OBJ), goals (REC-FW-GOAL), guidelines (REC-FW-GDL), and potential management approaches including utilizing recreation users councils to resolve user conflicts.

We maintain relationships with many agencies, local governments and user groups and agree this is an important strategy. We will continue to enhance our engagement in managing recreational opportunities and resolving potential conflicts.

8331

The draft environmental impact statement analysis of effects on recreational use do not disclose the effect of closing roads due to reclassification displayed in table 14 on page 53 and table 106 on page 487 which indicate a reduction of lands classified as roaded natural (RN) on all three forests. (There should be an analysis of the effect of reduced RN areas on driving for pleasure and the effect on special use permittees that support this use.)

Response: The final environmental impact statement analysis on the reductions in the roaded natural class and other recreation opportunity spectrum classes was updated to reflect correct numbers and percentages. We also added an explanation for the reduction in motorized recreation opportunity spectrum classes (including roaded natural) under chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, Sustainable Recreation and Scenery.

8332

The County doesn't fully understand the implications of the recreation opportunity spectrum across the different alternatives and how it will affect its recreation economy or communities. (The Inyo National Forest and County should thoroughly vet recreation opportunity spectrum alternatives with communities, perhaps through specific outreach to the County's Regional Planning Advisory Committees, and define the relationship of the recreation opportunity spectrum tool to requests for recreation activity inventories, which have been requested by the Town of Mammoth Lakes and Mammoth Lakes Recreation. These are key discussions in setting the landscape for recreation opportunities and activities into the future and should not be treated superficially as they have to date.)

Response: There is no direct correlation between recreation opportunity spectrum classification (and the minor variations in boundaries and acreage of recreation opportunity spectrum by alternative as described in the final environmental impact statement) and economics. The recreation opportunity spectrum classes described in all alternatives provide a wide range and quantity of recreational settings and are not expected to have a determinable effect on the recreational economy of the communities. Further information regarding the economic effects of the plan as it relates to recreation and the local communities can be found in the "Benefits to People and Communities-Economic Conditions" section of chapter 3 of the final environmental impact statement. Also see response to comment 8330.

8333

Buffering existing wilderness to create special viewsheds is not consistent with the California Wilderness Act of 1984, which emphasized that areas not designated as wilderness *"need not be managed for the purpose of protecting their suitability for wilderness designation."* Pub. L No. 98-425 section 111(b)(5), 98 Stat. 1629. (Include language in the plan that specifically allows for motorized use of non-wilderness lands; this includes fixing those recreation opportunity spectrum areas currently designated for non-motorized use adjacent to wilderness.)

Response: See response to comment 8117.

Neither the forest plan nor the final environmental impact statement seek to buffer existing wilderness by creating special viewsheds. Per the 2012 Planning Rule (36CFR 219.7 (v), we are required to identify and evaluate lands which may be suitable for inclusion in the National Wilderness Preservation System. Through this process, we determined undeveloped areas adjacent to wilderness had the most wilderness characteristics of the eligible lands. These lands would be recommended for designation by Congress under alternatives B and B-modified. Alternative C would also recommend additional wilderness areas that are not adjacent to existing wilderness. The rationale used by the forest supervisor to determine whether to include polygons in alternatives B, B-modified, or C is included in the record of decision.

The recreation opportunity spectrum establishes expectations and informs the management of settings. The physical, managerial, and social settings vary by recreation opportunity spectrum class. The recreation opportunity spectrum does not eliminate or allow a specific activity; it help us decide how to manage overall settings and what a visitor might expect on the landscape.

8334

The draft plans fail to balance the recreation opportunity spectrum in order to improve recreation based on current needs (Cordell et al 1999). (The plans should maximize the area allotted to Semi Primitive Motorized management because dispersed motorized trail systems are essential for many people's enjoyment of the remote semi primitive experience.) (Consider using recreation opportunity spectrum to manage recreational activities on the forest rather than designating wilderness.)

Response: The recreation opportunity spectrum described in the final plan provides for a wide range and quantity of various recreational settings. Recreation of all types are anticipated to grow over the next three decades on National Forest System lands – with the greatest growth expected in nonmotorized activities (Cordell et al 1999), which could lead to potential user conflicts. Existing designated motorized routes were considered and excluded from any nonmotorized recreation opportunity spectrum classes and recommended wilderness in any alternative, so no conflict exists in relation to current motorized uses. Designations for existing and future motorized use are conducted through subpart B of the Travel Management Rule and could affect recreation opportunity spectrum class boundaries if routes are added in nonmotorized recreation opportunity spectrum areas. Recreation opportunity spectrum describes settings and character of areas as it relates to recreational experience and infrastructure; it does not restrict or allow specific activities.

8336

There are significant discrepancies and mistakes in recreation opportunity spectrum classifications between existing conditions (alternative A) and the desired objectives

laid out in alternatives B through D and the recreation opportunity spectrum designations do not reflect the ground conditions.

Response: Some discrepancies were identified through public comment and further internal review. These have been addressed in the final plan through adjustments to recreation opportunity spectrum boundaries, various changes in recreation opportunity spectrum class, and updates to the associated tables in both the plan and in the final environmental impact statement. Additional discussion of the recreation opportunity spectrum and sustainable recreation components are found in the final environmental impact statement in chapter 3 in the "Sustainable Recreation and Scenery" section and in the plan in the "Sustainable Recreation" section in chapter 2 and Sustainable Recreation Management Areas in chapter 3.

Also see response to comments 8334, 8339, 8340, 8343, and 8344.

8337

Large scale tree mortality is not reflected in the recreation opportunity spectrum designation for primitive, semi-primitive, and roaded natural areas making it difficult to achieve the designated recreation opportunity spectrum.

Response: Recreation opportunity spectrum describes the setting as it relates to recreational experience and expectations. Tree mortality clearly has an effect on the visual quality and potential hazards in recreational areas but does not change the overall character of an area in terms of recreational setting and experience. Certain treatments could affect the "Evidence of Humans" criteria for recreation opportunity spectrum but would not likely affect the overall recreational setting. Any potential hazard reduction and vegetation management approaches would be designed to fit with the recreation opportunity spectrum setting to the extent possible.

8339

There is an error in the recreation opportunity spectrum application for the Sherwins area adjacent to the town of Mammoth Lakes which may lead to future conflict and confusion. the alternative A recreation opportunity spectrum map shows a mix of Rural, Semi-Primitive Non-Motorized and Semi Primitive Motorized zones, which do not necessarily reflect existing conditions for designated motorized travel (for example Rural classification for an area where there are no existing roads or designated motorized routes). On the alternative B through D maps, the same zones are all classified Semi-Primitive Motorized, despite the fact that there is only one designated motorized route in the entire area— the Laurel Lakes Road. We believe this is a mistake. Aside from concerns such mistakes raise about the accuracy of recreation opportunity spectrum classifications in the rest of the draft revised plans, this also raises concerns about how a mis-classification of this kind might ultimately inform winter recreation opportunity spectrum classes and Subpart C planning or other future management actions.

Response: The final plan contains an updated forestwide recreation opportunity spectrum map (final plan, appendix A) with some adjustments that were made in response to comments and additional review.

A winter recreation opportunity spectrum map is also included in the final plan (appendix A), which displays the various winter recreation opportunities currently available on the Inyo which are related to different winter settings and typical activities. Future planning efforts, such as subpart C of the Travel Management Rule (Over Snow Vehicle Travel Designations) could

modify recreation opportunity spectrum boundaries for either winter or summer settings and experiences.

8340

The recreation opportunity spectrum for the area around the Pine Creek Mine complex is inaccurately identified and is based on the Inyo TMP maps which do not apply to the Pine Creek Mining Complex.

Response: See response to comment 8339.

Additionally, while this area contains some currently impassable administrative and mining roads that are not on the motor vehicle use map and are not available for public recreation, the recreation opportunity spectrum has been updated to reflect a setting without motorized recreation (semi-primitive nonmotorized). There is no current operating plan or and there are no permits for any of the mining parcels accessed by the roads, and no motorized use is currently allowed in this area. It is unlikely the public would encounter uses inconsistent with the semi-primitive nonmotorized setting, and this setting would likely remain the same with minor inconsistencies, even if a small amount of motorized use was present in the area.

8343

The recreation opportunity spectrum maps in alternatives B through D have incorrectly classified the same zones as Semi-Primitive Motorized even though there is only one designated motorized route in the area (the Laurel Lakes road on the Inyo National Forest).

Response: The final plan contains updated recreation opportunity spectrum map(s) (appendix A) with some adjustments to this and other areas, based on public comment and additional review. Since the setting in much of the referenced recreation opportunity spectrum area is currently without motorized presence, and this is consistent with the desired conditions for the area, more of this area was placed in the semi-primitive nonmotorized class.

8344

Acreages and percentages of land assigned to the various categories of recreation opportunity spectrum are inconsistent across various areas of the draft environmental impact statement and draft forest plans making it impossible to evaluate whether or not the amount of land allocated to motorized recreation versus non-motorized recreation will be in a reasonable balance. (Accurate acreage and percentages should be published and the documents corrected. [draft environmental impact statement, pp. 52, 468, 472, 475; Inyo Final Plan, p. 40; Sequoia Final Plan, p. 44; Sierra Final Plan, p. 53].)

Response: Errors in the referenced tables and text related to acreages of different recreation opportunity spectrum classes have been corrected and updated in the final plan “Sustainable Recreation” section and the final environmental impact statement under chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, Sustainable Recreation and Scenery to reflect changes in the recreation opportunity spectrum classes made between the draft and final documents.

8345

The draft environmental impact statement does not contain recreation opportunity spectrum maps showing the acreage of each discrete recreation opportunity spectrum area which is necessary for verifying the recreation opportunity spectrum. (The Forest

Service should provide this recreation opportunity spectrum map in a Sequoia environmental impact statement with discrete recreation opportunity spectrum acreages in each of the many sub recreation opportunity spectrum areas)

Response: The plan includes several tables that list the acreages of each recreation opportunity spectrum class across the Inyo (chapter 2, Social and Economic Sustainability and Multiple Uses, "Sustainable Recreation" section) and within the different sustainable recreation management areas (chapter 3, Management Areas, "Sustainable Recreation Management Areas" section). Recreation opportunity spectrum maps were also included in the plan displaying both the summer and winter recreation opportunity spectrum classes on the Inyo National Forest (appendix A). This information was used within the final environmental impact statement analysis as well (chapter 3, "Sustainable Recreation and Scenery" section).

8346

The draft environmental impact statement is missing information making it impossible to determine the completeness of the analysis and the validity of the proposed actions without a clear view of all the data layers. (Include a map that displays the recreation facilities and forest transportation layers, which are currently missing from the analysis.)

Response: In response to this comment, we included additional information in the "Sustainable Recreation and Scenery" section, "Affected Environment of the Sustainable Recreation" section to better reflect the known information on recreation facilities and the Inyo National Forest transportation system (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas). This information was used to analyze potential impacts to recreation facilities and the Inyo National Forest transportation system across alternatives. More detailed maps (for instance, forest visitor map and motor vehicle use map) that display recreation facilities and the Inyo transportation system can be found online (Inyo National Forest Maps and Publications https://www.fs.usda.gov/main/inyo/maps-pubs).

8347

The draft environmental impact statement table 98 (overview comparing alternatives) is misleading regarding the recreation opportunity spectrum because it does not show the net gain or loss of each type of recreation for each alternative including both positive and negative effects for recreation opportunity.

Response: A correction was made in response to this comment, in which a table was added in the final environmental impact statement displaying the differences between alternatives for each recreation opportunity spectrum class (chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Sustainable Recreation" section).

Mountain Biking and Mechanized Recreation

8348

Designation of additional wilderness, wild and scenic rivers and the proposed Pacific Crest Trail corridor reduces access and recreational opportunities for mountain biking, therefore, do not adopt a plan that further restricts mountain biking recreational opportunities.

Response: The final environmental impact statement includes analysis of the proposed recommended wilderness areas on opportunities for mountain biking (chapter 3, revision topic 3:

Sustainable Recreation and Designated Areas, "Wilderness" section). The effects are similar under alternative B and alternative B-modified, as the four recommended wilderness areas would not reduce mountain biking opportunities. The effects to mountain biking opportunities are greater under alternative C. The description of why alternative B-modified was chosen is included in the "Preliminary Administrative Recommendations" section of the record of decision.

The effects of mountain biking opportunities are similar to those mentioned in response to comment 8289, as direction for the Pacific Crest Trail and wild and scenic rivers do not prohibit mountain biking opportunities.

8350

Inherent bias against mechanized recreation in the environmental impact statement and plan development due to lack of comparison of wilderness creating the exclusion on trails of mountain bikes but not horses

Response: The plan includes direction for continuing mechanized recreation uses in several areas, including: REC-FW-DC 01, 03, 11, 12, and 13; REC-FW-GOAL 03 and 10; and MA-DRA-DC 05. The plan does not prohibit motorized uses along authorized roads or trails.

The final environmental impact statement analysis was improved to include an effects analysis of the reduction of mechanized recreation within proposed recommended wilderness under each alternative (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation, "Wilderness" section). The use of horses within designated or recommended wilderness is not reduced within recommended wilderness because this is not a prohibited activity within wilderness areas (16 U.S.C. 1121-1136, 1964, as amended, "Prohibition of Uses" section).

8351

Lack of acknowledgement of the importance/prevalence of mechanized recreation

Response: In response to this comment, a description of mechanized recreation on the Inyo was added to the affected environment section in the final environmental impact statement (chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Sustainable Recreation" section).

8352

Wilderness study areas should not be closed to bikes.

Response: The plan does not include direction for wilderness study areas, but there is direction in the recommended wilderness section that states mechanized transport is not suitable within recommended wilderness areas (MA-RWLD-SUIT 01). This language was included because management of recommended wilderness should retain their social and ecological wilderness characteristics and other identified features of value until their designation as wilderness or other use are determined by Congress (MA-FWLD-DC 01).

8353

Management of mechanized uses mountain biking is an expanding use throughout the Sierra Nevada and nationally. Our scoping comments explained why mountain bikes should be limited to a system of roads, trails, and areas that is designated through environmental and public review. This reasonable recommendation was not addressed in the draft environmental impact statement, and the draft plans provide no direction on

mountain biking. Recommendations: Limit mechanized uses such as mountain biking to a designated system.

Response: The draft plan did not include direction on managing mountain biking activities, because we did not determine it to be necessary across the Inyo. The final plan does recognize the underlying concern of resource impacts associated with off-trail mountain biking. Responding to this, we have a goal in the challenging backroad recreation management area, where these types of impacts are of most concern. This goal can be found in the final plan (chapter 3, MA-CBRA-GOAL-01).

8354

The term "mechanized" should be replaced with the term "human-powered," which does not have the same negative connotation as "mechanized." The term "mechanized" could also apply to oars on river boats, to backcountry skiing gear, or even to spring-loaded trekking poles. Yet we do not see any of those activities under scrutiny.

Response: Mechanized transport is defined in chapter 3 of the environmental impact statement as, “transport powered by a living or non-living power source and includes such things as bicycles and game carts.” The analysis specifically states bicycle use is allowed on both designated nonmotorized and motorized trails throughout the Inyo National Forest except within areas with specific prohibitions to mechanized transport, such as wilderness and recommended wilderness, research natural areas, or other restricted areas. This applies to all classifications in the recreation opportunity spectrum, including areas in primitive and semi-primitive nonmotorized classes.

Also see response to comment 8328.

8355

Bicyclists should be allowed to continue to ride on any trails that are currently open in any recommended wilderness until Congress makes a wilderness determination. There is no evidence that continuing bicycle use will damage the resource.

Response: The responsible official has decided not to allow nonconforming uses in recommended wilderness on the Inyo in order to preserve the wilderness character, since bicycles and any mechanized transport are allowed in wilderness. The rationale for this decision, as well as the recommendations for wilderness, can be found in the record of decision.

8356

The plans should include desired conditions for mechanized use trails.

Response: See response to comment 8355, for mechanized use trails in recommended wilderness. For other areas on the Inyo, desired conditions do not specify mechanized use but are included to provide this opportunity. REC-FW-DC-04, REC-FW-DC-11, and REC-FW-DC-12 are examples.

8357

Propose additional areas that provide mountain biking recreational opportunities.

Response: See response to comment 8356.

8358

Greater front country concentrated uses could impact the quality of water supplies to communities.

Response: We acknowledge that an increased use and concentration of visitors in front country areas may impact water quality for local communities. To prevent such impact, the Inyo forest plan includes plan components (forest plan, chapter 4, Sustainable Recreation Management Areas/Destination Recreation Area, Desired Conditions (MA-DRA-DC-03, 04, 06, 07, and 08) that account for changes in visitor use levels and patterns of use in concentrated, front country areas ("Destination Recreation Areas"). The plan components direct us to protect resources, which might result in more infrastructure, heavier maintenance, or more controls such as setting capacity limits with an overall aim of insuring the recreational activities contribute to ecological, social, and economic sustainability.

8359

The plans should streamline the process by which volunteer groups can engage with the Forest Service personnel in trail maintenance, interpretation, and education.

Response: Plans focus on what Forest Service personnel will do and not how. An emphasis on volunteer participation is reflected in the plan components including desired conditions, goals, and potential management strategies which appear in chapter 2, of the "Volunteers, Interpretation, Partnerships and Stewardship" section. How Forest Service personnel will streamline the process will be developed at the project level guided by law, regulation, and policy.

8360

The plans should include language that specifically allows for human-powered mechanized use in recreation opportunity spectrum "primitive" areas as well as recreation opportunity spectrum "semi-primitive non-motorized." Please note that this is not intended to change the fact that bicycling is currently interpreted as being illegal in wilderness.

Response: The final plan has recreation opportunity spectrum settings that allow nonmotorized trails in both primitive class and semi-primitive nonmotorized class. The recreation opportunity spectrum merely describes a setting and management of uses such as human-powered mechanized use is guided by forestwide and management area desired conditions and other plan components that can be found in the "Sustainable Recreation" section.

8361

The recreation opportunity spectrum maps indicate where motorized recreation may take place on the forests, and subsequent travel management plans should be consistent with the recreation opportunity spectrum maps. However, decisions in the travel management analysis made to satisfy the minimization criteria required by the 2005 Travel Rule may result in land use restrictions that differ from the patterns in the recreation opportunity spectrum map.

Response: The recreation opportunity spectrum describes settings and character of areas as it relates to recreational experience and infrastructure; it does not specifically restrict activities. Other regulatory actions resulting from plans, such as travel management, may restrict uses that otherwise are consistent with the recreation opportunity spectrum class or designate specific uses that could be considered inconsistent with the class. Depending upon the scale of inconsistency, the recreation opportunity spectrum class could be changed by a future planning effort.

8362

Plan direction on biking needs to address new technologies and related impacts. "Fat tire bikes" are enabling users to ride off trail into steeper and more sensitive terrain (for instance meadows). There should be a single well-written set of regulations and management preferences that are distributed to local vendors that rent these bikes. (Inyo National Forest specific comment but applies elsewhere).

Response: The "Sustainable Recreation" section of the final plan includes a number of plan components that respond to managing activities in sensitive environments and new and emerging activities. Examples include the following: REC-FW-DC-04, REC-FW-GOAL-02, REC-FW-DC-10, and MA-GRA-DC-08.

8363

Form partnerships with interested mountain bike groups, like the International Mountain Biking Association, as a way to leverage management resources.

Response: An emphasis on volunteer participation is reflected in the plan components including desired conditions, goals, and potential management strategies which appear in chapter 2 of the "Volunteers, Interpretation, Partnerships and Stewardship" section. Forest plans are general in nature and identifying a specific user group or organization in plan components would be too specific. We promote and value partnerships and fully support a collaborative volunteer approach to managing resources when appropriate.

8364

There is a lack of integrated trails systems, stacked loops, and connectivity in the limited existing bike use trails. Mammoth Lakes Trails may be the partner to fill this great need. But there really needs to be a specific area chosen as the "where" for a real non-motorized trails system. The Motorized planning process completed in 2009 defined your roads system. This massive planning effort did not address our non-motorized, yet non-wilderness uses. Some of the closed roads would make useful trails. Yet most are isolated dead end roads that were closed. The redundant parallel roads might be useful, economical, and environmentally responsible non-motorized trails. Yet the process only dealt with the 'decommissioning' of those roads.

Response: The plan does not address site-specific planning efforts for trails or other infrastructure but specifically allows additional development in certain areas of the Inyo National Forest. New mountain bike trails could be considered for many areas of the Inyo where there are not specific prohibitions, such as those applying to wilderness and recommended wilderness, research natural areas, etc. While the plan does not specify precise locations for bike trail or other development, the general recreation areas described in the "Sustainable Recreation" section of the final plan offer the best potential for the expansion of recreation opportunities and development – as long as partnerships are available to assist with maintenance and management of any new facilities.

As with any new infrastructure, adding new bike trails to the trail system would require appropriate project-level planning through the National Environmental Policy Act process. The scope of the travel management process (subpart B of the 2005 Travel Management Rule, 36 CFR 212) was limited to designating roads and trails for motorized use and did not make determinations regarding any nonmotorized activities or future ground-disturbing restoration activities on routes not designated for motorized use.

8365

Clearly identify that the issues at hand are more complex than the typical dichotomy of motorized versus non-motorized users, and that there's a need to recognize other activities such as mountain biking.

Response: The recreation opportunity spectrum specifically identifies the motorized and nonmotorized dichotomy. The physical, managerial, and social settings vary by recreation opportunity spectrum class. Recreation opportunity spectrum does not eliminate or allow a specific activities; it helps us decide how to manage overall settings and what a visitor might expect on the landscape. Our final plan recognizes that recreation opportunity spectrum does not adequately manage uses and this is why we have developed the three-management-zone framework to acknowledge the complexity of uses.

8367

Control mountain bike use and damage on trails:

Bicycle controls and penalties and adherence to the current policies and regulations - Issue: Terrain degradation due to improper travel and trail widening. - Generate revenue from stiff penalties and fees. Violators pay for damages. - Adhere to current controls, policies and regulations and tighten/limit the quantity of bikes - Charge admission fees for each bike and each rider and the company that is providing services. Allow a conditional permit for California Back Country Horsemen to get permission to use tools and mechanical devises as an exception to the rule when clearing and maintaining trails and facilities.

Response: Forest plans are intended to be strategic to identify long-term or overall desired conditions and offer general direction for achieving those desired conditions. A forest plan guides and constrains Forest Service personnel not the public.

Any constraint on the public needs to be imposed by law, regulation, or through the issuance of an order by the responsible official under 36 CFR part 261, subpart B (final plan, chapter 1, “Purpose of the Forest Plan” section). In addition, the Forest Service has a multiple-use mission. The sustainable recreation forestwide direction incorporated into the revised plan describes the desired condition of year-round recreation opportunities including designing and maintaining a designated system of roads, trails, and areas that provide a variety of motorized and non-motorized recreation experiences at varying level of difficulty. Mountain biking, like all other appropriate recreational activities, needs to be managed. Forestwide recreation guidelines describe managing recreation uses to prevent impacts to other resources and recreation settings (REC-FW-GDL-01, 02, 03). Other plan components direct us to seek collaborative input on sustainable recreation opportunities to address potential conflicts between activities and any resource impacts that may be of concern (REC-FW-GOAL-01, 04, 06, 09, 10, 11; VIPS-FW-DC-01). Potential management approaches have been included in the “Sustainable Recreation” section to address trail etiquette, rehabilitating recreation sites that have caused damage, and development of a “recreation users council” to address recreation-related issues, including user conflicts.

8368

I support mountain bikers on U.S. Forest Service land under the following conditions: Absolutely no wearing head phones under any circumstances while riding a bike. It is vital to hear those around you particularly if a horse rider or pedestrian wants to give instructions on how to pass safely or stop and get off your bike for a green or spooky

horse. Not to exceed a speed of 5mph when less than 100 feet line of sight on a logging road or on any single track. Use bell box system as employed in California state park Los Osos in San Luis Obispo at every trailhead where bikes are allowed. This allows a constant reminder for bikes and a helpful alert system to communicate with pedestrians and equestrians.

Response: See response to comment 8367.

Recreation Access

8369

There are no plan components to minimize interruptions to recreation access affected by other activities (restoration, timber harvest, road construction, other).

Response: Sustainable recreation plan components (chapter 2) have been added to address the need to have integrated resource planning to address impacts to changing conditions in recreation settings (final plan, REC-FW-DC, REC-FW-GDL).

8371

Concern that campground and access closures during periods of high stream flows need to be reconsidered.

Response: A forest plan guides and constrains the actions of Forest Service personnel not the public. Any constraint on the public can only be imposed by law and regulation or through an order issued by a Forest Service responsible official.

Agency closures and prohibitions are for safety or environmental reasons. These closures are normally temporary in nature and address a public safety hazard for all living in and visiting these areas. The change in season is contributing to the rapid and unpredictable currents in rivers and streams.

Title 36 of the Code of Federal Regulations 261.50 (a) gives each forest supervisor the authority to issue orders which close or restrict use of the described areas within the area over which he or she has jurisdiction. An order may close an area to entry or may restrict the use of that area by applying any or all of the prohibitions authorized in 36 CFR 261, subpart B (see below).

Section 261.53 Special closures.

When provided in an order, it is prohibited to go into or be upon any area which is closed for the protection of:

(e) Public health or safety.

8372

Manage the forests and recreation access to assure the next generations can enjoy them.

Response: The 2012 Planning Rule requires that forest plans provide for social, economic, and ecological sustainability within Forest Service authority and consistent with the inherent capability of the plan area (36 CFR section 219.8). This includes ecosystem integrity for forests as well as sustainable recreation. We developed plan direction that provides for social, economic,

and ecological sustainability, as analyzed in the final environmental impact statement and supported by the record of decision.

8373

Another concern is the Endangered Species Act, and the designation of the yellow-legged frog and Yosemite toad as endangered and threatened. How will this affect access to our forests in the future? I would suggest that the Forest Service be aware of the obstacles they may face in the future, and create a plan of action to effectively work with the U.S. Fish and Wildlife Service to protect endangered species while allowing access to our public lands.

Response: See response to comment 9044 for discussion of critical habitat designation on National Forest System lands for species protected by the Endangered Species Act. On the Inyo National Forest, the majority of the critical habitat for these species is located in designated wilderness where compliance with the Wilderness Act constrains the types of access allowed.

Same as response to comment 8374.

8374

The draft environmental impact statement mistakenly focuses on limiting mountain biking and off-highway vehicle use due to possible concerns of wildlife breeding disturbance, when a likely larger problem is the impacts caused by hiking and equestrian use. The environmental impact statement must reconsider these issues based on the above and remove limitations on mountain bike and motorized use.

Response: The only limitations on mountain biking and off-highway vehicle use in the final plan are in areas of recommended wilderness. The plan establishes desired conditions and plan components that ensure protection of listed species (see biological assessment). Decisions that affect mountain biking and off-highway vehicle use would occur at the project level and would be consistent with plan direction for both sustainable recreation and the Endangered Species Act.

8375

In order to comply with the same environmental regulations to minimize known impacts, the environmental impact statement must also seek to limit the hiking and horseback to the same extent as mechanized and motorized use.

Response: Hiking and horseback riding are included in any plan direction that addresses recreational uses, such as impacts from trampling with riparian conservation areas (MA-RCA-STD-07 and 08). The final environmental impact statement compares the effects of the alternatives to mechanized and motorized uses, as well as to hiking and horseback riding (chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Sustainable Recreation” and “Wilderness” sections).

8376

Remaining roadless areas should be managed to protect their wild, non-motorized character.

Response: The Roadless Area Conservation Rule (36 CFR 294 subpart B, Protection of Inventoried Roadless Areas) and Forest Service policy guide and restrict management activities within inventoried roadless areas. Direction for managing inventoried roadless areas is located Forest Service Manual 2323.22. According to the 2012 Planning Rule, “Plans should not repeat

laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System (36 CFR 219.2 (b) 2)."

8377

The plans should limit visitor access to recreation sites through diurnal, seasonal, or temporary closures during critical life cycle and weather periods for affected at-risk species, and during high fire danger and/or red flag conditions.

Response: Forest plans do not compel or direct any action, so limiting visitor access to recreation sites would be appropriate at the site level. Site-level analysis would determine what at-risk species are present and direction from the U.S. Fish and Wildlife Service would be incorporated into the decision. The forest plan, REC-FW-DC-06, supports the safety of Forest Service employees and the public which would include danger from fire. REC-FW-DC-03 supports ecological sustainability and REC-FW-DC-10 addresses dispersed recreation and natural resource impacts. All provide direction that would support site-level decisions to protect at-risk species.

8378

Opposes large area (154,275 acres) designated as CARs (p16) because it is viewed as causing adverse impacts on recreation. [Also noted in Aquatic Strategy.]

Response: Under alternative B-modified, critical aquatic refuges will not be designated. Conservation watersheds, although covering more acreage than critical aquatic refuges found in alternatives A, B, C, and D do not include any plan language that prohibits or restricts recreation use or activities. Recreation direction for conservation watersheds states any site-specific activities that occur within the destination or general recreation areas will continue to promote the maintenance or restoration of the Watershed Condition Framework indicators (MA-CW-STD 01). The final environmental impact statement includes an analysis of the conservation watersheds in alternative B-modified, as compared to critical aquatic refuges in alternatives A, B, C, and D (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, "Sustainable Recreation" section and chapter 3, revision topic 2: Ecological Integrity, Aquatic and Riparian Ecosystems).

8379

Concern that riparian conservation areas limit access to multiple uses and county objects to expanded role of riparian conservation area management direction would substantially change (from current Plans). [Also noted in Aquatic Strategy.]

Response: Plan direction for riparian conservation areas does not change between alternatives in the final plan, with one exception. Alternative A is derived from the Sierra Nevada Framework as amended by the 2012 Planning Rule. Alternatives B, C, and D use the same approach as alternative A. The exception in alternatives B, C, and D is active use of prescribed fire within the riparian conservation areas.

General Recreation

8380

Forest Service visitation numbers are inaccurate and need to be revised

Response: The National Visitor Use Monitoring Program provides us with data on visitation on the Inyo. A nationwide standard survey protocol using the best available science to implement the

program is used. Because of the comprehensive sampling design, the visitation estimates provided by national visitor use monitoring are accompanied by a measure of statistical precision. National visitor use monitoring surveys are completed every 5 years. The visitation numbers in the final revised plan are from the 2011 Inyo National Forest survey reports. While we completed the survey in 2016, we have not yet received the final visitation numbers report from the Washington Office. When the report is complete, the full national visitor use monitoring dataset will be posted on the Forest Service recreation program website at https://www.fs.fed.us/recreation/programs/nvum/.

8381

There are changes that will occur to recreation opportunities and visitation that were not incorporated in the draft environmental impact statement (off-highway vehicle, rock climbing, mountain bike). Therefore, these effects have not been analyzed nor considered adequately by decision makers. Effects resulting from changes in recreation opportunities need to be analyzed and added.

Response: In response to this comment, the final environmental impact statement analysis for all recreation uses, including off-highway vehicle use, rock climbing, and mountain biking, were added to the "Sustainable Recreation" section of the final environmental impact statement. The effects on motorized and nonmotorized uses were compared for all alternatives and can be found in chapter 3, revision topic 3: Sustainable Recreation and Designated Area, "Sustainable Recreation" section. The effects on rock climbing for all alternatives can be found in chapter 3, revision topic 3: Sustainable Recreation and Designated Area, "Sustainable Recreation" section.

8382

Wilderness impacts to established rock climbing routes.

Response: Rock climbing is an accepted activity in wilderness. Wilderness designation does not impact established rock climbing routes.

See response to comment 8460.

8383

The growing population and increasing users need to be incorporated in the plan and draft environmental impact statement analysis.

Response: The revised plan components recognize growing populations, changing and emerging uses, and the necessity of managing for these activities. Based on public comments such as this, considerable changes were made to the sustainable recreation framework in the final plan, and the analysis in the final environmental impact statement has been updated for sustainable recreation (see final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Area, "Sustainable Recreation" section).

8384

Management actions that provide for sustainable recreation need to be a priority in forest plans and budgets. Without funding, the number of recreation opportunities and

the quality of those opportunities will decrease. Plan components should reflect this budgetary priority.

Response: Plan components must be written so they are in accordance with Agency authorities. The Forest Service can plan only what it has authority over. The funds are appropriated by Congress and outside the authority of the Forest Service.

The sustainable recreation strategy for the future relies heavily on volunteers, partnerships and stewards to help us provide quality recreation facilities and experiences (REC-FW-OBJ-04, REC-FW-GOAL-03, 04, and 05). Within the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan, desired conditions address the need to partner with multiple partners (VIPS-FW-DC 01, 02) to achieve sustainable recreation which included maintenance and repair of facilities, roads, and trails.

8385

The plans need to ensure recreation areas are protected and maintained. While the draft plans and draft environmental impact statement often mention that climbing, paddling, mountain biking, and skiing occur in certain areas of the forests, rarely do these documents actually describe how plan components or plan direction relate to these activities. We have provided many comments on how the Forest Service can and should integrate recreation management into the plans but have not seen these comments reflected in the documents the Forest Service has produced.

Response: See response to comment 8322.

Additionally, forest plans are strategic and do not address site-specific activities. Project-level planning would be necessary to determine the amount and type of activity in an area on the Inyo.

8386

Driving for pleasure was omitted from recreation places description

Response: Recreation places have been removed from the plan. In the final environmental impact statement under the Sustainable Recreation effects analysis, driving for pleasure was included as one of the top 10 recreational activities in terms of visitor participation on the Inyo National Forest. Driving for pleasure stayed relatively constant between 2006 and 2011 (national visitor use monitoring figures) and is recognized to be a significant activity and recreational draw for visitors to the Inyo National Forest.

8387

The plans should include direction to improve recreational maps.

Response: Improving recreational maps is an operational function that is typically not driven by plan direction. However, there is a desired condition for keeping recreation information up to date (see forest plan, REC-FW-DC-10).

8388

The Forest Service should add backcountry skiing, winter fat tire biking, ice climbing, and whitewater paddling to the list of dispersed recreational activities mentioned on page 470 of the draft environmental impact statement.

Response: The Inyo National Forest does offer a diversity of year-round recreational activities, the top ten of which are listed under the "Sustainable Recreation" section of the final

environmental impact statement, which the commenter references. The additional activities the commenter listed do occur on the Inyo; however, in an attempt to not exclude any popular recreational activities, the final environmental impact statement only lists the top ten activities determined by the national visitor use monitoring data.

8389

The Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest.

Response: See response to comment 8329.

8392

The forest plans should showcase each forest's niche: sightseeing; water-based recreation (including non-motorized boating, swimming and other waterplay activities); non-motorized trails for hiking, mountain biking and pack-and-saddle; rock climbing; bouldering; skiing; remote backcountry experiences; hunting, fishing, and wildlife viewing; and conservation education. Although these elements are listed at least once throughout each draft plan, the final plans should specifically mention these recreation activities whenever there is an opportunity to do so.

Response: Each national forest in Region 5 defined their recreation niche in the recreation facility analysis in 2007. These niche descriptions are intended to inform the public what the national forest is about. It is a descriptor, rather than a listing of the activities occurring on the Inyo at any given time. The niche descriptions are also not prescriptive. The Inyo National Forest niche is “Inspiring Destinations”. As a recreation forest, multiple recreation opportunities are available. The Inyo’s niche remains in the final plan, chapter 2, Sustainable Recreation, Introduction.

8393

Recreational residences need to be recognized as contributing tax benefits to counties. How the Forest Service manages these residences can have an effect on these county tax revenues. There needs to be more recognition of the current tax benefits provided by these residences.

Response: A description of the contributions of recreational residences has been added to final environmental impact statement, chapter 3, Economic Conditions – Local Fiscal Conditions. It is not expected that the revised plan would have any effects on management of recreational residences on the Inyo.

8394

Strategic Fire Management Zones. Wildfire Restoration Zone, Standard 01 and; Wildfire Maintenance Zone, Standard 02; These standards mandate the use of a variety of barriers and features "when managing wildfires," including trails. Since this direction is vague, we are concerned that this will result in trails infrastructure being used for fire lines built with motorized equipment, which would destroy the existing trail infrastructure, leading to needs for extensive reconstruction. This matter is dealt with in the Pacific Crest Trail management area through a specific standard. Many of these system trails provide important access to the Pacific Crest Trail and are part of the Pacific Crest Trail experience. Discussion is needed by fire and trails agency staff and NGO partners that would result in better, more detailed language that facilitates fire

control without resulting in undo damage to the forest trail system. [Also added to general fire.]

Response: In response to this comment, language was added to the MA-WRZ-STD 01 that states, "Heavy equipment use may be limited due to resource and safety concerns."

8396

Inyo National Forest strengthen the Draft Inyo Forest Plan… Recreation: We need healthful outdoor recreation that does not destroy or degrade our natural forest. Not all recreation is created equal, and the call for "multiple use" by conflicting users must be considered and the uses prioritized by importance of most healthy and least harmful to more harmful recreation forms that degrade and pollute.

Response: See response to comment 8318.

Additionally, sustainable recreation final plan components have desired conditions (REC-FW-DC) which describe the year-round recreation setting for a broad range of nature-based recreation opportunities. These activities provide ecological, social and economic sustainability across the Inyo. The necessity of recreation infrastructure being located in ecologically resilient landscapes and ensuring dispersed recreation does not impact natural or cultural resources is discussed in several forest plan components in the "Sustainable Recreation" section of the final plan. REC-FW-GDL-01, 02, 03 and potential management approaches address rehabilitating recreation sites that have caused damage, and development of a "recreation users council" to address recreation-related issues, including user conflicts.

8397

Inyo National Forest the National Government needs to increase funding for the Forest Service to provide more rangers, maintenance workers to address the backlog of necessary maintenance and repair of facilities, trails and roads, etc. Without additional funding for staff, the Forest Service must plan an even more conservative and protective revision to manage our forest.

Response: Forest plans do not direct the amount of funding received or the application of funds; they guide the emphasis of work to be done. Forest work is accomplished through a blend of congressionally appropriated funding, awarded grants from a variety of external sources, and work accomplished through volunteers and partners. The sustainable recreation strategy for the future relies heavily on volunteers, partnerships and stewards to assist us in providing quality recreation facilities and experiences (final plan, REC-FW-OBJ-04, REC-FW-GOAL-03 through 06). In the "Volunteers, Interpretation, Partnerships, and Stewardship" section of the plan, desired conditions address the need to partner with multiple partners (final plan, VIPS-FW-DC).

8398

Plan direction for sustainable recreation is too vague and general and would not protect resources, clarify plan direction on sustainable recreation.

Response: The final plan has forestwide direction for sustainable recreation desired conditions (REC-FW-DC), objectives (REC-FW-OBJ) goals (REC-FW-GOAL), guidelines (REC -FW-GDL), and potential management approaches. There are also three specific sustainable recreation management areas in chapter 3 – Area Specific Management Direction (Destination Recreation Areas, General Recreation Areas, and Challenging Backroad Recreation Areas). Each has specific standards and guidelines that provide a framework for future management actions for recreation

and resource protection and additional desired conditions, objectives, goals, and guidelines that protect resources and settings.

8399

Add plan components that would trigger restoration and/or restrictions on recreation when it is found to have negative impacts.

Response: See response to comment 8398.

Specific sustainable recreation management area components describe restrictions and restoration when negative impacts occur from recreation: final plan, chapter 3, MA-GRA-GDL-01 and MA-CBRA-STD-04.

8400

Additional plan direction is needed to provide better visitor education and interpretation so that all visitors better understand how to act responsibly.

Response: The final plan has plan components for sustainable recreation and volunteers, interpretation, partnerships, and stewardship (final plan, chapter 2). REC-FW-GOAL-06 addresses enhancing responsible recreation through interpretation and education. Forestwide guideline REC-FW-GDL-09 discusses improving etiquette and responsible behaviors. Forestwide potential management approaches consider local organizations and partners to help provide interpretation, as well as educating forest users.

8402

Chapter 3. Management Strategy. Plan Objectives. Sustainable Recreation. 03. The percentage of Pacific Crest Trail up to standards should be at least 60 percent (as opposed to 40-60 percent).

Response: Same as response to comment 8266.

8404

Sustainable recreation, forestwide. In the Sierra plan, guidelines 09 and 10 should also be adopted by the other two forests.

Response: Sierra National Forest’s draft plan sustainable recreation guideline 09 is related to snow pack requirements for over snow vehicle travel; that concern is addressed in the Inyo plan component REC-FW-GOAL-11. Sierra National Forest’s draft plan sustainable recreation guidelines 10 is related to appropriately managing special use permits; that concern is addressed in existing statutes governing authorization and administration of special uses. Special uses are required to be managed in a manner that protects natural resources, public health, and safety and are consistent with National Forest System land management plans, and are required to be administered based on sound resource management objectives and sound business principles (forest plan, chapter 2, “Lands” section, Introduction).

8406

Inyo National Forest. The plans did not sufficiently address sustainable recreation. We appreciate the work that was completed by the U.S. Forest Service Washington, DC office to create "Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation," published in June, 2010. The Inyo National Forest should

integrate elements of the Framework into the draft land management Plan's Sustainable Recreation emphasis area.

Response: The final plan has a “Sustainable Recreation” section that incorporates elements of the Washington Office publication “Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation," published in June, 2010. Forestwide direction (chapter 2) as well as recreation management areas (chapter 3) have been added to the plan; all have plan components. The potential management approaches acknowledge recreation is the economic base of many communities and there is a need to connect people with natural landscapes by providing a diverse range of quality natural and cultural resource based partnerships. The forestwide desired conditions (REC-FW-DC) work toward a sustainable balance among environmental, social, and economic conditions.

We acknowledge partnerships are essential to protect the natural, cultural, and scenic environment for present and future generations. Citizen stewardship has been identified as key in sustaining quality recreation experiences, helping us solve problems, providing interpretation and education, and assisting with maintenance of Inyo National Forest facilities. The “Volunteers, Interpretation, Partnerships, and Stewardship” section of the plan addresses the need to partner to improve recreation opportunities on the Inyo (VIPS-FW-DC-01, 02) and goals (VIPS-FW-GOAL 04, 05, 07, and 10). Desired conditions have been developed to address the need for partnerships to help manage recreation opportunities on the Inyo (VIPS-FW-DC 01, 02).

8410

While the forestwide desired conditions related to sustainable recreation for the draft plans set worthy goals, and while we understand that long-range plans cannot dive too deeply into tactical prescriptions, there is little in the plans that specifically describes what steps the Forest Service will take to achieve these desired conditions. In order to be effective, Desired Conditions must be supported with other required plan components, including specific standards and guidelines. Without a full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, the plans do not provide a clear path towards achieving the desired conditions. Plan components should be added to ensure that the Forest Service's sustainable recreation goals are met. [Refer to Outdoor Alliance’s letter for specific suggestions.]

Response: The final plan has forestwide plan components for sustainable recreation: chapter 2, desired conditions (REC-FW-DC), objectives (REC-FW-OBJ), goals (REC-FW-GOAL), guidelines (REC-FW-GDL), and as potential management approaches. Additionally, we zoned three sustainable recreation management areas (destination recreation areas, general recreation areas, and challenging, backroad recreation areas), each of which has additional plan components to ensure Inyo National Forest goals for sustainable recreation are met (Sustainable Recreation Management Areas, chapter 3).

8411

The following plan components should be added to better integrate sustainable recreation with other uses:

-Standard: Forest management activities and direction are aligned with recreation opportunity spectrum setting and characteristics.

-Desired condition: Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.

-Standard: When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.

-Guideline: The Forest Service should coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.

Response: The final plan components make it clear we manage for outdoor recreation activities that are consistent with recreation opportunity spectrum (settings). Final plan components for forestwide sustainable recreation consist of desired conditions (chapter 2, REC-FW-DC) for recreation that includes recreation infrastructure, minimizing impacts to cultural and natural resources, while contributing to the local economy.

Once the plan is in place and we conduct site-specific analysis for project development and implementation (as required by the National Environmental Policy Act), we will be following plan direction for sustainable recreation, so a standard is not needed.

Plan component GOAL (REC-FW-GOAL-01) was incorporated verbatim from the suggested guideline comment.

8412

We feel uncertain as to whether the Forest Service has considered and integrated comments that relate to other recreational resources. For example, the American Alpine Club and the Access Fund have repeatedly emphasized the importance of climbing areas as valuable resources, suggested the Forest Service clearly state that climbing is an appropriate activity across all three forests, and asked that the draft plans provide clear direction on fixed anchors …

Without clear direction in the plans as to anchor and bolt replacement policies, and recognition that climbing is an appropriate activity in wilderness and non-wilderness areas alike, recommending the Golden Trout Wilderness Addition could potentially conflict with a popular and historic recreation use within this area.

Response: The issue of fixed anchors in wilderness is not being addressed in this plan, because it is being addressed at a national policy level through Forest Service directives.

8413

Inyo National Forest sustainable recreation plan direction needs to address commercial message. It should include language to ban commercial messaging forestwide, including those under SUP.

Response: The Forest Service Directive System consists of Forest Service manuals and handbooks, which codify the agency's policy, practices, and procedures. The Forest Service has direction in place nationwide for commercial advertising, thus it is not appropriate to address in a

forest planning effort. Forest Service 2340.03.11 provides specific direction that is clearly defined regarding advertising at privately provided recreation sites. Forest Service 2700 provides guidance for issuance of special use permits (commercial and non-commercial). Advertising can be allowed under specific circumstances with written approval from the Forest Service.

8414

Each plan should include a standard requiring a minimum snow depth of 18 inches for over-snow vehicle travel. This standard was in previous plans and has been dropped from the new plans.

Response: The existing 1988 Inyo forest plan does not have snow depth standards for over-snow vehicle travel; neither does the draft plan. Forest plans are intended to be strategic to identify long-term or overall desired conditions and offer general direction for achieving those desired conditions. The analysis of specific activities or the closure of access to specific activities is not required at the forest plan level.

There is no requirement that a plan component on snow depth relating to OSV be included in the forest plan. There is a requirement to designate such areas in 212.81, travel management planning for over-snow vehicles, but travel management planning is project and activity level planning, not forest planning. The Forest Supervisor chose not to include any snow depth standard in the Forest Plan, but to consider snow depth during Travel Management analysis (Subpart C), a separate National Environmental Policy Act (NEPA) analysis.

8415

In regard to large wildfires and the insect and disease epidemic, information presented in revision topic 3 (Sustainable Recreation and Designated Areas) does not include CURRENT analyses of the affected environment, which then makes the consequences discussions useless.

Response: In response to this comment, language was added to the Affected Environment discussion in the “Sustainable Recreation” section of the final environmental impact statement that addresses current tree mortality on the Inyo. As stated in the “Insects and Pathogens” section of the final environmental impact statement, tree mortality is occurring on the Inyo National Forest but at a lesser scale than the west side of the Sierra Nevada (chapter 3, Agents of Change: Climate, Fire, Insects, and Pathogens). We address this mortality through removal of hazard trees, (trees that pose a safety issue to the public).

8417

Quiet winter recreation opportunities should be provided on the Forests.

Response: Quiet (nonmotorized) winter recreation activities are an important component of recreation on the Inyo National Forest. The final plan does not designate winter motorized uses or quiet winter recreation opportunities; however, it includes a forestwide summer recreation opportunity spectrum map and a winter recreation opportunity spectrum map in appendix A that display existing winter recreation opportunities and settings currently found on the Inyo National Forest.

The suitability of winter uses, specifically over-snow vehicle use, will be determined in the plan (Forest Service Handbook 1909.12 23.23(a)(2)(d) and linked to the desired winter recreation

opportunity spectrum classes. In doing so, settings managed for quiet winter recreation are established in desired winter primitive and semi-primitive nonmotorized recreation opportunity spectrum settings. When we complete Travel Management Rule subpart C - Use by Over-Snow Vehicles (36 CFR Parts 212, 251, 261, and 295, 2005), specific routes and areas for over-snow-vehicle activities will be designated. This project-level analysis will determine where winter motorized uses are authorized and where they are prohibited (quiet winter recreation opportunities). These designations will be consistent with the forest plan's desired winter recreation opportunity spectrum settings or will result in a plan amendment to change the desired winter recreation opportunity spectrum setting(s).

8418

Final alternative should include actual metrics to maintain a wide range of recreational and visitor use.

Response: The final plan provides a wide range of recreation opportunities. Recreation opportunity is defined in the 2012 Planning Rule as an opportunity to participate in a specific recreation activity in a particular recreation setting to enjoy a desired recreation experience (2012 Planning Rule, Definitions, 36 CFR 219.19). We use the recreation opportunity spectrum to define recreation settings and categorize them in six distinctive classes. The recreation opportunity spectrum map (appendix A) illustrates these class assignments. The forestwide "Sustainable Recreation" section gives the number of acres and percentage of the total forest area for each class. Metrics for visitor use is provided in the National Visitor Use Monitoring Report for each national forest and is updated with a new survey every 5 years.

8419

Integrated recreation management practices should be emphasized more. Plan direction should be added to: provide ready access to easily understood basic regulations, helping visitors understand and remember regulations, ensure enough presence and enforcement that visitors feel someone cares and do not have to police each other, provide easy-to-follow feedback procedures to allow visitors to alert U.S. Forest Service to any problems, and provide a clear pathway and set of triggers for changes in management when monitoring indicates that management isn't working.

Response: The final plan has desired condition plan components that address visitor education and information in several sections in chapter 2, Volunteers, Interpretation, Partnerships, and Stewardship (VIPS-FW-DC 01-07), Sustainable Recreation (REC-FW-DC 13), Local Communities (LOC-FW-DC 05), Fire (FIRE-FW-DC 05, 07), and Animal and Plant Species" (SPEC-FW-DC 05). The plan also addresses the need for working with local partners and organizations to develop a robust program to increase on-the ground stewardship, given the limited capacity of the agency (REC-FW-GOAL).

8420

Littering is the number one challenge facing our forests. Instead of restricting use for law abiding citizens, the plans should include language to correct actions of the few law breaking visitors who litter.

Response: See response to comment 8419.

8421

Sequoia National Forest and Inyo National Forest: Range, Forestwide 05: In the Sequoia draft, there is direction which reads as follows: "the productivity of all forest

rangelands is maintained or improved through adequate protection of the soil, water, and vegetative resources." This direction is not found in the Sierra or Inyo Plans, but we believe that it should be. We recommend the following additional direction: "In locations where surface water resources are valuable to recreational travelers for treatment and consumption, and that water is also important to range stock, efforts are made to provide for both uses through development of protected sources for recreational use and separate provision for livestock consumption."

Response: See response to comment 6053.

8422

Inyo National Forest (Strengthen the Draft Inyo Forest Plan) Additional protections are needed to provide for clean water in recreational facilities and to educate visitors about proper use and good behavior.

Response: We are required to comply with the Clean Water Act of 1972, as amended. The primary responsibility for the protection of water quality in California rests with the State Water Resources Control Board and nine Regional Water Quality Control Boards. Lahontan Water Quality Board has regulatory authority over the Inyo National Forest. Water quality in the region is protected through the development of regulations and permitting processes based on scientific research, inspecting permitted facilities and, if necessary, taking enforcement actions against entities violating state or federal water laws. We work closely with the Lahontan Water Quality Board and with various counties to ensure water quality is protected and all potable water sources on the Inyo are in compliance.

The "Sustainable Recreation" section in chapter 2 of the final plan (REC-FW-DC, REC-FW-GOAL) and the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan both have plan components regarding improving on visitor information and education, as well as potential management approaches. Desired conditions address the need to partner with multiple partners (VIPS-FW-DC) in order to achieve the desired outcomes.

8423

With more visitation to front- and back-country destinations, permits should only be offered to those who have demonstrated understanding of rules and regulations concerning fire restrictions, waste management, and watershed buffer zones for camping. (Perhaps a short video to watch before a fire permit is issued?) Also, adequate facilities for sanitation, parking, education, signage and enforcement for these destinations need to be assured to protect the resources.

Response: The "Sustainable Recreation" section of in chapter 2 of the final plan (REC-FW-DC, REC-FW-GOAL) and the "Volunteers, Interpretation, Partnerships and Stewardship" section of the plan both have plan components regarding improving on visitor information and education, as well as potential management approaches. Desired conditions address the need to partner with multiple partners (VIPS-FW-DC) in order to achieve the desired outcomes.

8424

Integration of scenic character and scenic character stability into restoration desired conditions and design criteria should not morph into giving credence to the "view shed" concept and requiring buffers around wilderness to protect the "view". Scenic

character and scenic character stability are arbitrary terms that require a clarification of intent.

Response: The definition of 'scenic character" can be found in 36 CFR 219.19:

> Scenic Character. A combination of the physical, biological and cultural images that give an area its scenic identify and contributes to its sense of place. Scenic character provides a frame of reference from which to determine scenic attractiveness and to measure scenic integrity.

The Scenery Management System established in 1995, is codified in Agriculture Handbook 701, Landscape Aesthetics. Per this handbook, desired scenic attributes are derived from ecological unit descriptions: for example, ecological units of California (Goudey and Smith 1994) that describe this desired character. Landscapes that are consistent with these ecological unit characteristics and possess diverse attributes, particularly vegetation with a heterogeneous composition and varying size structure, have the greatest potential for high scenic value and maintaining a sense of place. Scenic integrity assesses the degree to which this character has been altered by human-caused actions. Human-caused landscape alterations can raise, maintain, or lower scenic integrity. Scenic stability assess the extent to which the landscape's vegetation condition and structure, irrespective of human action, is inconsistent with natural ecological conditions, per ecological unit descriptions. From a scenery-management standpoint, landscapes of high scenic value with low scenic integrity or low scenic stability are deemed priorities for restoration treatment to achieve desired conditions. The Scenery Management System methodology has a landscape visibility step; however, the step did not use wilderness boundaries as a basis for establishing visibility or view shed determinations; therefore, wilderness viewshed buffers were not created.

8426

The draft environmental impact statement makes a biased and unsubstantiated claim that "high-severity fire can decrease the scenic character and lower the recreation value."

Response: High-severity fire causes a short-term change in scenic character and recreational value because vegetation plays a major role in establishing and maintaining scenic character and sense of place in national forest recreation settings. Recreation settings with ecologically sound landscapes possessing diverse attributes, particularly vegetation with a composition containing a variety of species, area distribution, and canopy height, have the greatest potential for high scenic value and maintaining a sense of place. High-severity fire, while providing benefits to other resources, can have a negative effect on scenic character if it reduces the heterogeneity of the vegetation type, distribution, and structural composition (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Scenery” section). Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions.

8427

Given that Congress designated these forest lands as the nation's first Scenic Area and provided a mandate to protect their scenic integrity, the entire Mono Basin Scenic Area

should be designated as a high integrity level landscape, at a minimum. The eastern portion is only assigned a moderate integrity level.

Response: Scenic integrity objectives were developed based on direction provided in the Landscape Aesthetics - A Handbook for Scenery Management (Agriculture Handbook 701) as directed in Forest Service Handbook 1909.12, chapter 20, 23.23f. This handbook provides direction on how to map scenic integrity objectives. Mapping scenic integrity objectives is a modeling process which does not consider scenic area designations. The Mono Lake area scenic integrity objectives were developed based on the features the model considers.

8428

While the designation of a Pacific Crest Trail Management Area with direction for scenic integrity objectives (SIOs) of high to very high addresses many of our concerns, the management of middle ground and background for a minimum SIO of moderate is critical for meeting the experiential opportunities that one would associate with a National Scenic Trail. While the maps indicate SIOs that meet this need, following wording should be added as an additional desired condition to make that intent clear: "Travelways that are nationally recognized for their experience based on scenery will be protected through meeting minimum SIOs of moderate." An alternative would be: "Travelways that are nationally recognized for their experience based on scenery will be protected through maintenance of seen forest lands in a natural appearing condition where development does not dominate the experience of the visitor."

Response: The forest plan provides a minimum scenery objective of moderate for lands view beyond the Pacific Crest Trail management area (SCEN-FW-GDL-02).

8429

Scenery, Forest wide 01 through 04 Direction under 03 is vague and undefined. It seems to suggest that economic values for local communities trump the value of nationally valued resources. Scenery resources should not be disregard for short term benefits for a limited sector of the public. This direction should be dropped or rewritten to address the matter in a more balanced way.

Response: Desired condition statement 03 has been dropped. Its intent is covered in the remaining desired condition statements for the scenery resource (SCEN-FW-DC-01 through 05).

8432

02 (Scenery, Forestwide). This is obviously a critical concern for Pacific Crest Trail A. After reviewing maps included in the plan drafts which show SIOs for the area surrounding the Pacific Crest Trail Management Area, it is our understanding that all lands in the middle ground zone and most areas in background have an SIO of moderate or higher. Given this we suggest the following added wording to clarify the direction (suggested additions in italics): "Maintain scenic integrity objectives and scenic stability levels for the Pacific Crest Trail corridor, and surrounding National Forest System lands viewsheds, for the retention of panoramic views and landscape connectivity. *Lands viewed beyond the Pacific Crest Trail Management Area will meet an SIO of at least moderate as seen from the Pacific Crest Trail*." With this in mind, we support this guideline with the addition of recommended wording and would object if it were deleted or substantially revised otherwise. This is perhaps one of the most critical

pieces of direction in the plan to assure that the trail experience is protected and that the intent of the National Trails System Act is carried out.

Response: The suggested edit to clarify SCEN-FW-GDL-02 has been made. See response to comment 8228.

8433

03 (Scenery, Forestwide) While the Pacific Crest Trail Association supports restoration activities in particular and agrees that it may be necessary to deal with impacts that fall outside the SIO, we are concerned that the term "long-term timeframes" will give managers little incentive to have projects recover to a point where restoration activities meet SIOs in a reasonably short timeframe. We would recommend a meeting between forest staff (landscape architects, timber and silviculture, ecologists and vested non-governmental interests) to craft a better guideline that would better meet a variety of resource needs.

Response: See response to comment 8429.

8434

Recreation places are another component that would benefit from additional review and public vetting. In the spirit of "place-based planning" strategies, the names, geographic boundaries, and descriptions of these recreation places should resonate with the local communities and other stakeholders.

Response: See response to comment 8435.

8435

Within the recreation places, key locations receive more-intense visitation that results in increased impacts to resources and the visitor experience. Special management direction specific to the challenges faced at each location is needed, such as sanitary and visitor service facilities, parking and traffic management, increased enforcement and education, additional signage, etc.

Response: The draft plan had a concept called “places” which were management areas with little direction. “Places” were developed and used in the draft environmental impact statement to manage place-based recreation activities and uses on the Inyo National Forest. The “Sustainable Recreation” section within the final plan has been updated; the concept of “places” has been removed and the final plan now includes a concept of sustainable recreation zones. There are three recreation management areas identified within the final plan. The destination recreation area has direction specific to the challenges of managing intensive recreation developments within the natural setting of the Inyo National Forest, particularly those that are highly popular and iconic. Plan components specific to the management issues of destinations are in place for the destination recreation areas, general recreation areas and the challenging, backroad recreation areas to ensure that recreation experiences and settings are managed appropriately (final plan, chapter 3).

8436

The descriptions of places just list general activities and don't mention current conditions, impacts, user capacity, anything about natural resources, or information that is important to quantify when presenting desired conditions. In general, the desired conditions for Places consist of broad boiler-plate statements that are completely open to interpretation, non-committal and non-action." What determines a "quality experience" for visitors? What about conflicting recreational activities. Dispersed use

areas are managed to maintain the recreation opportunity spectrum? Of all classes? Is this appropriate? Motorized recreation and dispersed use seem to be a conflict. Suggest listing the appropriate classes for each place. Without doing so, it leaves the possibility of expanding the spectrum to always include more recreational activities that may be in conflict with others.

Response: See response to comment 8435.

Additionally, we understand user conflicts exist and that expanding recreation activities creates more opportunities for visitors but also more opportunities for conflict. Our intent is to provide a quality recreation experience for visitors.

The final plan "Sustainable Recreation" section has a potential management approach of considering a recreation users council to monitor, mitigate, and resolve use conflicts as well as plan components that address user conflicts (final plan, MA-GRA-DC-07 and MA-CBRA-DC-05).

8437

The draft environmental impact statement recreation places is supposed to include the existing conditions in the desired conditions. We object to the environmental impact statement not including existing motorized use in the recreation places desired conditions. Motorized travel, off road recreation, and mountain bike recreation are significant activities, and as such extremely important components for rural economies. Many sections of the draft environmental impact statement proclaim the importance of world class whitewater boating, which is not only seasonal, but severely limited during drought or low water years. So it is puzzling that the draft land management plan recreation places desired conditions would include seasonal whitewater boating as important, but excludes motorized and mechanized recreation opportunities these "Recreation Places" provide.

Response: See response to comment 8435.

8438

Fishing, horseback riding, mountain biking and rock hounding are excluded from many of the recreation places desired conditions even though these activities occur in them.

Response: See response to comment 8435.

8439

The draft environmental impact statement/DLRMP must accurately represent the participation and value of all forms of recreation including motorized use. It must not state limited motorized recreation, since this is a subjective judgment, which implies the inability to expand motorized recreation.

Response: See response to comment 8435.

The final plan sustainable recreation areas allow for a broad variety of activities and uses, including motorized recreation. The plan manages for activities that are consistent with recreation opportunity spectrum settings that have been mapped. Any decisions that designate or decommission motorized recreation would occur at the project level.

8441

Within recreation places, consider designating special recreation management areas to address specific areas where many different recreational uses are concentrated. Develop plan components for these special management areas.

Response: See response to comment 8437.

8442

Tribal uses are not correctly acknowledged in the descriptions for some places

Response: The concept of places was developed and used in the draft environmental impact statement to manage place-based recreation activities and uses on the Inyo National Forest. The concept was never fully developed and has been replaced by a new strategy. See response to comment #8435

8443

While dividing the forests into "Recreation Places" is a good place to start, the plans should define particular Special Recreation Management Areas within these broader places. Inyo specific examples include Needles, Mt. Whitney, Buttermilks and Mammoth Lakes Basin - discrete areas that receive high levels of visitation and would benefit from more focused recreation management direction.

Response: See response to comment 8435.

There are now forestwide sustainable recreation plan components (final plan, chapter 2) and three sustainable recreation management areas (final plan, chapter 3), each with its own objectives, goals, guidelines, and potential management approaches. Special areas that receive high levels of visitation on the Inyo National Forest (Whitney Portal and the Mammoth Lakes Basin are good examples) are in the destination recreation area management area, which has a focus on managing high use levels and the accompanying support facilities. The Buttermilk area is part of the general forest recreation area, where a broad spectrum of landscapes, activities and uses are occurring. Focused recreation management for site-specific activities would occur at the project level.

8444

We think it important to identify "recreation places" as geographic areas since they are intended to convey the character of an area and the recreational services these areas would provide.

Response: See response to comment 8435.

8445

Inyo National Forest only; recreation places; the Pacific Crest Trail traverses many of the Recreation Places described in this section of the plans. All of the Recreation Place descriptions containing the Pacific Crest Trail includes a description of the Trail except the Reds Meadow-Fish Creek Place. We would like to see a description of the Pacific Crest Trail added to this recreation place.

Response: See response to comment 8435.

Final plan direction for the Pacific Crest Trail can be found in the final plan, chapter 3. Forestwide management direction has been refined for sustainable recreation (final plan, chapter

2). There are also specific plan components for three recreation management areas (final plan, chapter 3).

8446

While dividing the forests into "Recreation Places" is a good starting place for thinking about how recreation is integrated into overall forest management, the Forest Service should define particular special recreation management areas within these broader places. Designating special recreation management areas is a way for the forest plans to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable - both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment.

Response: See response to comment 8437.

8447

The following plan components related to special recreation management areas should be added:

Desired condition: Places of special recreational significance are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support. Examples include climbing areas, backcountry skiing or paddling destinations, and trails recognized as exemplary for mountain biking or hiking.

Standard: Special recreation management areas shall be managed in accordance with the appropriate recreation opportunity spectrum setting necessary to protect their unique recreational experience.

Guideline: Fire management within special recreation management areas should strive to protect and preserve recreation infrastructure.

Guideline: The Forest Service should work with local and national partners to maintain and develop the recreation infrastructure (trails, river access sites, climbing anchors, and winter trailheads) necessary for the public to access and enjoy special recreation management areas.

Response: The final plan has forestwide direction for sustainable recreation desired conditions (REC-FW-DC), objectives, goals, guidelines, and potential management approaches, as well as specific sustainable recreation management area plan components (destination recreation areas, general recreation areas, challenging, backroad recreation areas). Each sustainable recreation management area plan component has desired conditions, goals, and guidelines that provide a framework for future management actions for recreation management and resource protection. They identify specific activities as these are managed at the project level.

The recreation opportunity spectrum is integrated into each of the recreation management areas and is a clear descriptor in the desired condition of each area and of the setting we are managing. Places of special recreational significance (Mammoth Lakes Basin, Whitney Portal) tend to be in the destination recreation management area, while specific activities often take place across multiple management areas.

Recreation infrastructure is included in the risk assessment and modeling that went into the wildfire management zones in the draft plan. It was included in the community wildfire

protection zone and it is considered part of the “community assets” referred to in the plan description of the community wildfire protection zone and the general protection zone descriptions and plan components (see plan introduction to the strategic fire management zones and the description of the community wildfire protection zone). The Sierra Nevada wildfire risk assessment (a separate document) describes all the data and process used to generate the wildfire protection zones. We do not believe a separate guideline is necessary.

The final plan does have guidelines for partners to maintain and help with infrastructure. The “Volunteers, Interpretation, Partnerships, and Stewardship” section of the plan addresses the need to partner to improve recreation opportunities on the Inyo (final plan, VIPS-FW-DC, VIPS-FW-GOAL). Standards and guidelines were not included in the revised plan for partnerships, because we depend upon available partners to achieve the work. The definition of goals and potential management approach plan components meet the intention of working with partners to achieve the plan’s desired conditions.

Similar to response to comment 8410.

8448

An example of an area that we feel would benefit from designation as a Special Management Area is the Mammoth Lakes Basin. [See Outdoor Alliance’s letter for several specific comments re: Mammoth Lakes Basin and suggested plan components]

Response: In the final plan, recreation management areas establish the desired conditions, objectives, goals, and guidelines for locations such as the Mammoth Lakes Basin.

In addition, the forestwide sustainable recreation final plan components (chapter 2 - Desired Conditions and Guidelines) provide the framework for how we will improve, manage, and limit existing recreation sites (REC-FW-DC-04 and 06 and REC-FW-GDL-01 through 03) along with a potential management approach that addresses redesigning, restoring, and rehabilitating sites if unacceptable resource impacts are occurring.

8449

Additional Special Management Areas that we recommend the Forest Service consider in order to better balance important and growing recreational uses with resource protection and scenic integrity, are the Mt. Whitney and Buttermilk Boulders areas on the Inyo, the Kern River and Needles areas on the Sequoia, and the Bass Lake area on the Sierra National Forest.

Response: In response to this comment, we created recreation management areas in the final plan. These areas establish desired conditions, objectives, goals, and guidelines for locations such as Mt. Whitney and the Buttermilk Boulders areas.

In addition, the forestwide sustainable recreation final plan components (desired conditions and guidelines) provide the framework for how we will improve, manage, and limit existing recreation sites (REC-FW-DC-04 and 06 and REC-FW-GDL-01 through 03) along with a potential management approach that addresses redesigning, restoring, and rehabilitating sites if unacceptable resource impacts are occurring.

8450

Chapter 4, Guidelines, Scenery: The U.S. Forest Service recommends that scenic integrity objectives should be maintained. However, this is no definition for "scenic

integrity objectives." The forest plans include maps of the scenic integrity objectives but there is no description of what the objectives are, how the U.S. Forest Service will achieve them, or any proposed actions should the U.S. Forest Service encounter projects that would impact scenic integrity objectives.

This should be explored and that the public have the opportunity to review and comment prior to finalizing such guideline. This will allow project proponents such as utility companies that operate under permits or agreements to take into consideration U.S. Forest Service scenery objectives and to proactively plan around them.

The SMS is being used in this planning process, therefore, there should be standard(s) for meeting or exceeding assigned SIOs in the Standards section of the draft plans.

Response: The plan glossary defines scenic integrity objectives as:

> "equivalent to goals or desired conditions. Scenic integrity describes the state of naturalness or a measure of the degree to which a landscape is visually perceived to be "complete." The highest scenic integrity ratings are given to those landscapes that have little or no deviation from the landscape character valued by constituents for its aesthetic quality. Scenic integrity is the state of naturalness or, conversely, the state of disturbance created by human activities or alteration."

The plan provides supporting direction to address scenery, including a desired condition that states: "Scenic integrity is maintained in places people visit for high quality viewing experiences" (SCEN-FW-DC 03) and "The built environment meets or exceeds scenic integrity objectives and contributes to scenic stability" (SCEN-FW-DC 05).

8451

Develop a "pro-recreation" alternative that adequately addresses motorized recreation. Formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area.

Response: Alternative D in the final environmental impact statement is the "pro-recreation alternative" which provides the highest amount of motorized recreation opportunities across the Inyo National Forest.

8452

Include a reference to the United States Forest, USDA published document dated June 25, 2010 entitled "Connecting People with America's Great Outdoors, A Framework for Sustainable Recreation" and use the definition of sustainable recreation that is provided in this document.

Response: See response to comment 8406.

8453

The current language in draft plans (Sustainable Recreation, chapter 3, page 89 and appendix D, page 149) is going to compromise existing recreation facilities. This language should be removed or modified so existing and new facilities are not affected.

Response: Appendix D: Management Strategies for Resolving Recreation Resource Conflicts has been removed from the final plan. The final plan has forestwide sustainable recreation plan components (REC-FW-DC) as well as guidelines (REC-FW-GDL) that provide a framework for managing new and existing facilities.

8454

The draft environmental impact statement should also evaluate the impact of not having standards on the health of the deer herds and the effect this could have on hunting, wildlife viewing and other recreational pursuits.

Response: The California Department of Fish and Wildlife personnel manage and protect the state's fish and wildlife populations and is responsible for setting hunting regulations, taking into consideration the health of the populations. The Forest Service manages wildlife and fish habitat; therefore, the Inyo forest plan would not have standards for the health of deer herds. However, there is one forestwide goal (SPEC-FW-GOAL-02) focused on collaborating with California Department of Fish and Wildlife staff to assess potential disturbance factors to deer. There is also one guideline (SPEC-FW-GDL-02) that addresses disturbance to mule deer and directs us to implement vegetation treatments during times that minimize disturbance in mule deer holding areas.

8455

The environmental impact statement must contain an assumption statement that funding will be available to implement recreation trail maintenance in order to meet forest plan desired condition of sustainable trails, public recreation demand and to reduce environmental impacts. Instead the draft environmental impact statement states the Forest Service will be reducing recreation staff and funding over the next 15 years (draft environmental impact statement, volume I, p. 461).

Response: The amount of funding a national forest receives is not determined at the forest plan level but at a congressional level. Appropriate funding is not the only avenue open for Inyo National Forest personnel to accomplish desired conditions for sustainable trails. Expanding capacity and funding options are addressed in the final plan under Volunteers, Interpretation, Partnerships, and Stewardship desired conditions (VIPS-FW-DC) and goals (VIPS-FW-GOAL) and the "Sustainable Recreation Objective" section (REC-FW-OBJ).

8456

The plans should include an emphasis on sustainable recreation extending the recreation season into the spring and fall, or the shoulder seasons. This extension would positively affect the local economy, as well as provide opportunities to disperse recreation over a longer time frame and therefore reduce the impacts.

Response: The "Sustainable Recreation" section of the final plan (chapter 2) has a potential management approach the addresses the timely opening and closing of facilities based on seasonal considerations rather than a fixed administrative schedule.

8457

The plans should address the potential impacts of visitors' dogs in the forest to wildlife and the possible contribution to trail erosion, and also address managing their waste.

Response: Forest plan guidelines in chapter 2 generally describe some conditions where impacts from pets to wildlife can be addressed (see REC-FW-GDL-02, 04 and 05). More detailed management decisions would be addressed at the project level.

8458

The draft plans need to better recognize the growth in forest visitation by minority communities and consider components to ensure the uses of these communities are sustainable given this growth.

Response: Sustainable recreation plan components have been added to address the growth in Inyo National Forest visitation by diverse populations: forestwide desired condition (final plan, REC-FW-DC-02) and goals (REC-FW-GOAL-01 and 03).

8459

It is incorrect for the U.S. Forest Service to connect sustainable recreation with wilderness. They should be separated so that certain recreational uses are not eliminated under the guise of wilderness.

Response: The designation of wilderness by Congress as defined by the Wilderness Act of 1964 (Public Law 88–577) only allows certain recreational uses to occur in wilderness. Sustainable recreation is a facet of wilderness management. The agency manages wilderness by monitoring wilderness character which is defined by solitude, naturalness, primitive (nonmotorized and nonmechanized), and unconfined recreation and preservation of the quality of untrammeled. While Congress decides which lands become wilderness, the Forest Service makes decisions about the amount of recreation that is acceptable based on the monitoring of wilderness character.

8460

The following desired conditions be included in the forest plans: 1. Recreation management must include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity and the conditional use of fixed climbing anchors as appropriate. 2. Rock climbing destinations are places of special recreational significance and are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support. 3. Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities. 4. Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.

Response: Forest plans do not authorize any use and should not repeat laws, regulations, or policy. The policy on fixed climbing anchors would more appropriately be addressed at the regional or national level of planning.

Forest plans are general in nature and address recreation opportunities and settings as a whole. Specific activities are one component of recreation opportunities and recreation settings, may be discussed as a subcomponent of these, and are not emphasized one over another. Rock climbing is listed as an opportunity in the Inyo final plan (page 4).

See forestwide desired conditions for sustainable recreation (final plan, REC-FW-DC- 01, 02, 03, 05, 07, 09, and 12) and scenery (SCEN-FW-DC-01, 02, 03, and 04).

See forestwide desired condition for volunteers, interpretation, partnerships, and stewardships (final plan, VIPS-FW-DC-01, 03, 05, and 06).

8461

The forest needs to consider partnerships with groups to maintain access to rock climbing areas and a quality experience on all three forests.

Response: The sustainable recreation strategy relies heavily on volunteers, partnerships and stewards to help provide quality recreation facilities and experiences. The sustainable recreation plan components and potential management approaches in the final plan (REC-FW-GOAL-01, 04, 06, and 07, VIPS-FW-DC-01, VIPS-FW-GOAL-04 and 07) identify the need for partnership and volunteer assistance in managing a variety of recreation facilities, provide stewardship and interpretive services, maintain trails, restore landscapes, and enhance monitoring.

Appendix C: A Renewed Partnership Focus for the Inyo National Forest emphasizes the importance of partnerships to carry out the Forest Service mission, which is to "sustain the health, diversity, and productivity of the Nation's forests and grasslands and to meet the needs of present and future generations." Appendix C focuses on creating a partnership culture, improving capacity for working in partnership, establishing best practices for building new partnerships, and identifying steps for ensuring effective outreach and communication with nontraditional partners and the public.

Forest plans are not prescriptive, so the plan does not specify what type of partnership group we should consider; rather, it defines objectives and identifies features of a successful partnership.

8462

The plans should commit the Forest Service to increase partnerships with local community and conservation groups.

Response: See response to comment 8461.

8463

There is a large backlog of trail maintenance on the Forests, therefore, the plans should designate a greater use of partnerships to address maintenance backlogs.

Response: See response to comment 8461.

8464

The plans should include language for the Forest Service to partner with local service groups to upgrade, repair, and improve cleanliness of recreation facilities.

Example: The June Lake restrooms-

Response: See response to comment 8461.

8465

The plans need to better develop plan components for the non-Pacific Crest Trail trails on the forests. There is too much attention directed to the Pacific Crest Trail. Many of the plan components for the Pacific Crest Trail would also be applicable to non-Pacific Crest Trail trails (such as maintenance).

Response: The updated sustainable recreation plan components (final plan, REC-FW-DC) include direction specific the Inyo's trail system not just the Pacific Crest Trail.

8466

The plan needs to recognize the importance of trail design and maintenance in erosion. These factors can be more important than human use and therefore should be a focus of the forest rather than restricting uses.

Response: Trail design and maintenance is emphasized in national direction, Forest Service Handbook 2308.18. Forest plans do not repeat law, regulation or policy (for instance, Forest Service manual, Forest Service handbook, and CFR).

8467

The plans need to add a goal to FIRE-FW-GOAL to protect recreation access and opportunity. New: Where feasible, Fire Management activities will take into consideration the impact to recreation and trails. And in some cases Fire Management activities may actually enhance recreation opportunities, for example through creation of sustainable trails/roads that can be used for recreation as well as for fire management.

Response: The desired condition (Fire-FW-DC-02) under forestwide fire seeks to increase awareness and understanding about wildfire risk among community leaders, service providers, homeowners, permittees, and Tribes who are invested in or adjacent to the Inyo National Forest. This includes an understanding about the need to adapt communities, properties, and structures to wildfire while also recognizing that wildland fire is a needed ecological process.

8468

The plans should address deferred maintenance of recreational facilities.

Response: National direction in Forest Service manuals and handbooks give detailed direction on operations and maintenance of developed sites and trails. The sustainable recreation of the final plan (chapter 2) has plan components that address the maintenance of recreational facilities (REC-FW-DC, REC-FW-OBJ, REC-FW-STD, and REC-FW-GDL) as well a potential management approaches.

8469

Equestrian and pack opportunities need to be protected in the forest plans in order to allow those to access the forests with the assistance of these animals. In addition, these animals are part of the history of these lands so their use should continue.

Response: These uses are identified in the distinctive roles and contributions of the plan area in the “Sustainable Recreation” section of the final plan. The plan does not preclude the opportunities for pack stock or equestrian uses.

8470

The hunting and fishing license information provided in the draft environmental impact statement is in error and should be corrected.

Response: Fishing and hunting by those licensed in other counties is also an important contribution to the local economy. The Inyo County specific values represent the fact that if licenses are purchased in the County, then they are expected to be used in the County. However, this is clearly only a lower bound of the number of people engaged in this activity on the Inyo National Forest. This language has been added to the “Benefits to People and Communities-Economic Conditions” section of chapter 3 in the final environmental impact statement and also

in the Economics Supplemental Report - Important Inyo National Forest Contributions to Inyo County.

8472

The plans need to incorporate components to protect trout fishing opportunities.

Response: Recreation activities, such as trout fishing, are components of recreation opportunities and settings in sustainable recreation (final plan, chapter 2). California Department of Fish and Wildlife regulates the activity of trout fishing, while the Forest Service manages the aquatic habitat in cooperation with the State. Plan direction under sustainable recreation desired conditions (REC-FW-DC) supports the recreation opportunity and watershed desired conditions (WTR-FW-DC) supports the aquatic habitat critical for the recreation setting. Specific activities are managed at the project level, under separate National Environmental Policy Act decisions.

8473

Protecting white water kayaking opportunities need to be better incorporated into the draft plans.

Response: Whitewater boating is just one of the many opportunities available to Inyo National Forest visitors. Sustainable recreation plan components are inclusive of all activities and provide the flexibility for managers to respond to current and future recreational uses (final plan, REC-FW-DC). Forest plans identify long-term and overall desired conditions and provide general direction for achieving the (long-term) desired conditions.

8474

The plans need to better address deferred maintenance of recreational sites on the forests.

Response: See response to comment 8468.

8475

The plan needs to better incorporate components that promote both summer and winter recreational opportunities on the forests.

Response: The desired condition under sustainable recreation (final plan, REC-FW-DC 01) calls for a variety of year-round recreation opportunities. The Inyo National Forest has recreation opportunity spectrum class assignments for both winter and summer.

8476

The plan needs to better address the fact that recreational use on the forests is going to grow and expand. Plan components need to be developed to address the potential impacts from this growth.

Response: One of the assumptions in the environmental analysis is that recreation demand is increasing. Project population growth is also discussed in the analysis (final environmental impact statement, chapter 3, revision topic 3: Sustainable Recreation and Designated Areas, “Sustainable Recreation” section). Sustainable recreation desired conditions and guidelines (final plan, REC-FW-DC, REC-FW-GDL) are written to provide socially, ecologically and economically sustainable recreation opportunities and settings. They provide tools for managers to respond to impacts from increased recreation demand as well as other unexpected changes in demand.

8477

The plan needs to better set and enforce rules for mountain bikes on the forests. Current conditions are leading to ecological and safety impacts.

Response: Mountain biking is an allowed use of National Forest System lands. Regulation of this specific activity, outside wilderness (mechanized use is prohibited by law), would require a decision at the project level. It is not be appropriate at the forest plan level. The final plan under sustainable recreation (REC-FW-DC-04 and 12) does identify a variety of desired conditions that relate to minimizing impacts on sensitive environments and resources as well as sustainable trail systems.

8478

The forest plans should include a desired condition that unmanaged recreation will be resolved through a planned and properly designed network of roads, trails, and facilities, combined with educated citizen stewardship and partnerships, as well as field presence to provide quality recreation experiences while reducing the impacts of visitor use on the landscape.

Response: Unmanaged recreation is any unsustainable recreation activity. The resolution of an unmanaged condition would require a proposal and site-specific planning effort, but could potentially be addressed in a separate environmental review under the National Environmental Policy Act.

Forest plans are strategic, do not compel or direct any action, and are not prescriptive. In the final plan, recreation desired conditions (REC-FW-DC-07, 12, and 13) identify a sustainable trail system as a desired condition. Other desired condition statements cover sustainable developed sites and dispersed recreation. The desired condition for volunteers, interpretation, partnerships and stewardship (VIP-FW-DC-01) identifies partners and volunteers providing additional capacity.

8479

The plans should implement recycling programs at campgrounds.

Response: Forest plans are strategic, do not compel or direct any action, and are not prescriptive. Implementing a recycling program is an action the project-level decision maker would make. The final plan provides the administrative framework to encourage this action through sustainable recreation desired conditions (REC-FW-DC).

8480

The plans should reflect that the term sustainable recreation should apply to all recreation types - not just primitive.

Response: The “Sustainable Recreation” section has been updated in the final plan and applies to all recreation opportunity spectrum settings (final plan, chapter 2, Sustainable Recreation and chapter 3, Sustainable Recreation Management Areas).

8481

The plans need to identify new additional areas for developed group sites or other recreation opportunities based on the sustainable budget approach. In doing so, the

plans should attempt to find ways to accommodate all of the users' desired recreation types without sacrificing one for the other.

Response: The updated final plan includes a desired condition in the general recreation management area for expansion of recreational opportunities (final plan, MA-GRA-DC-06).

8482

The plans need to incorporate the aging baby boomer generation and its resulting numbers of people over 60-years old. This group as it continues to age will have different recreation needs and desires. The lack of analysis on this group and their needs and how these needs will impact forest management leaves the draft environmental impact statement without the full range of alternatives and the forest plan does not adequately address variations in growth demands.

Response: See response to comment 4091 (duplicate).

8483

The connection between the front country recreational and other uses has a direct impact on the quality and experiences that can only happen in wilderness areas. An additional desired condition linking these experiences together is important.

See response to comment 8435.

8484

The plans need to include management for the various unique recreational opportunities on each of the forests.

Response: A description of the Inyo National Forest Recreation Niche is in the “Sustainable Recreation” section (chapter 2). Desired condition plan components describe how recreational opportunities will be managed (REC-FW-DC).

8485

The plan should incorporate the Eastern Sierra Recreation Collaborative "Citizen Suggested Desired Conditions" document, which was a citizen effort to compile public input.

Response: Many of the suggestions from the Eastern Sierra Recreation Collaborative (ESRC) “Citizen Suggested Desired Conditions” document were incorporated into the final plan as plan components in the sustainable recreation forestwide desired conditions (final plan, REC-FW - DC). Specific statements derived from the five emphasis areas that were described in the document were used to develop objectives, goals, and guidelines forestwide (REC-FW-OBJ, REC-FW-GOAL, REC-FW-GDL) as well as potential management approaches in the sustainable recreation management areas. The “Volunteers, Interpretation, Partnerships, and Stewardship” section of the plan addresses the need to partner to improve recreation opportunities on the Inyo National Forest. The desired conditions (VIPS-FW-DC) and goals (VIPS-FW-GOAL) in this section address the comments and public input we received from the Eastern Sierra Recreation Collaborative regarding working with partners to maintain facilities and improve services to the public.

8486

The plan (chapter 2, p. 44) needs to follow NHPA which exempts existing facilities from being subject to resource impact mitigation measures. This component should clarified to exempt existing facilities.

Response: Section 106 of the National Historic Preservation Act (NHPA) mandates Federal agencies undergo a review process for all federally funded and permitted projects that will impact sites listed on, or eligible for listing on, the National Register of Historic Places. Specifically it requires the Federal agency to "take into account" the effect a project may have on historic properties including existing facilities.

8488

All the Management strategies for appendix D: Perimeter Control, Presence and Direct Actions are worded incorrectly and should be deleted, or modified in way that does not affect existing facilities.

Response: All facilities on National Forest System lands must meet Federal and agency requirements. Conservation education, perimeter control, presence, and direct action are strategies that may be used in resolving recreation resource conflicts (final plan, Sustainable Recreation, chapters 3 and 4).

8490

The plan should incorporate increasing fees in overcrowded areas to limit access.

Response: Forest plans are strategic, do not compel or direct any action, and are not prescriptive. A range of alternatives would need to be analyzed on a site by site basis to resolve a visitor management issue such as overcrowding and increasing fees.

8491

The plans attempt to reduce recreational opportunities on the forests. This should be corrected to allow for all types of recreation to continue and be a priority for management.

Response: Management priorities are set each year and support the National Strategic Plan developed on a national level every five years. A forest plan guides and constrains Forest Service personnel not the public. Any constraint on the public needs to be imposed by law, regulation, or through the issuance of an order by the responsible official under 36 CFR part 261, Subpart B. Management of National Forest System lands is also guided and constrained by laws, regulations, and policies; practices; and procedures in the Forest Service Directive System.

8492

The plans need to incorporate updates to the recreation facility analysis (2007) needs to be updated and its use built into plan components that go beyond decommissioning sites and capital investment to include a rotational monitoring schedule and deferred maintenance priorities.

Response: Recreation facilities have been addressed in the final plan through plan components including final plan, chapter 2, REC-FW-DC-06, REC-FW-DC-07, REC-FW-GOAL-05, REC-FW-GOAL-12, and REC-FW-GDL-02. The recreation facility analysis provides information useful at the site management level. Any future recreation facility analysis would tier to the forest plan.

8493

In the text for each plan, there is a paragraph that lists some dispersed recreation pursuits (for example on p. 3, paragraph 4, Sequoia draft). Given the volume and prominence of the activities of horseback riding, hiking and backpacking, especially given the amount of Wilderness within these Forests where many other dispersed recreation uses are not allowed, these activities should be included in all three plans. Sequoia draft includes horseback riding and hiking; Inyo draft refers to pack stock and backpacking, but all three plans should reference the three uses listed above.

Response: This comment is referring to suitability determinations for recreation uses. While working on the draft plan, early-adopter national forests were working with draft directives. The draft directives did not require a need for suitability determination for recreation.

The requirement for suitability determinations for motorized recreation is optional in the final directives (Forest Service Handbook 1909. 23.23a 2d). We felt it was unnecessary to identify suitability uses. However, not determining suitability does not preclude any uses.

8494

Perhaps the Forest Service can coordinate with other agencies to monitor permit usage and trail use.

Response: Permit use and trail use is a site-specific activity accomplished according to national direction. It is common practice to coordinate permit management with adjoining agencies. Forest plans do not direct any action. Permit management and trail use would be a site-level action.

8495

Add these objectives:

RECFWOBJ: New: Within 5 years of plan approval add 100 miles of new mixed use trails (hiking, running and mountain biking) with a maintenance partnership for insuring trails meet standard.

RECFWOBJ New: Within 5 years of plan approval add a minimum of five new trailheads in the front country to disperse recreational activity (hiking, biking, stock, off-highway vehicle and over-snow vehicles) including maintenance and management partnerships for new facilities.

Response: The Inyo forest plan did not identify expansion of the trail system or developed facilities as a desired condition. The desired conditions for trails are more general, focusing on an ecological, social, and economic sustainability. “An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions (2012 Planning Rule).” The action of expanding the trail system and associated trailheads would require analysis and a decision. Forest plans do not compel or direct any action and are not prescriptive.

Winter Recreation Opportunity Spectrum

8496

Winter recreation opportunity spectrum is different in terms of access and management than the summer recreation opportunity spectrum, and is not included in the draft

plans, therefore, the winter recreation opportunity spectrum needs to be developed for all three forests and included in the plan.

Response: The final plan has a winter recreation opportunity spectrum map that displays where current winter uses occur on the Inyo National Forest (final plan, appendix A). Future planning efforts, such as subpart C of the Travel Management Rule (Over-Snow Vehicle Travel Designations) could further modify recreation opportunity spectrum boundaries for either winter or summer characteristics.

8497

Develop plan components for winter recreation opportunity spectrum.

Response: The plan includes direction for recreation opportunity spectrum, which would include both summer and winter opportunities and settings, in the following standard: "The recreation opportunity spectrum will be used for decisions on facility and infrastructure design and development (REC-FW-STD-01)."

The plan also includes a winter recreation opportunity spectrum map (final plan, appendix A). Over-snow vehicle uses or designation was not included in the plan because this will be determined when we complete the subpart C of the Travel Management Rule (Use by Over-Snow Vehicles. The winter recreation opportunity spectrum map will establish the baseline for this decision.

8498

There is currently no winter recreation opportunity spectrum map for each Forest, therefore, they should be published as soon as possible, or a timeline developed, and a supplemental draft environmental impact statement should be published with the maps prior to the publication of the final environmental impact statement and Final Forest Plan.

Response: The final plan has a winter recreation opportunity spectrum map that displays where current winter uses occur on the Inyo National Forest (final plan, appendix A). The record of decision describes the rationale for why a supplemental environmental impact statement was not developed.

8499

The winter recreation opportunity spectrum map should be a guideline in determining only what forest lands are suitable for winter recreation and should not pre-determine the eventual over-snow vehicle use map.

Response: The final plan has a winter recreation opportunity spectrum map that displays current winter uses on the Inyo National Forest (final plan, appendix A). The recreation opportunity spectrum does not determine suitable uses on the Inyo. It provides a guideline for the recreation settings and opportunities that occur in an area (Sustainable Recreation, chapter 2). The suitability of winter uses, specifically over-snow vehicle use, will be determined when we complete subpart C of the Travel Management Rule (36 CFR Parts 212, 251, 261, and 295).

8500

Winter recreation, including travel management subpart c, is inadequately addressed in the plans and in the draft environmental impact statement, therefore, address winter

recreation in the plans and environmental impact statement, including a timeline for travel management.

Response: Forest Service travel planning handbook direction states:

> "Approval of a plan, plan amendment, or plan revision should not include a final decision designating roads, trails, or areas for motor vehicle use or over-snow vehicles use or otherwise restricting those uses. Rather, the land management plan provides information and guidance for travel management decisions" (Forest Service Handbook 7709.55 chapter 10, section 11.2).

The revised plan will not designate winter motorized uses but does provide a winter recreation opportunity spectrum map (final plan, appendix A) that displays the winter recreation opportunities and settings currently found on the Inyo National Forest. During a project-level analysis, subpart C of the Travel Management Rule, we will determine where winter motorized uses are authorized.

8501

The final environmental impact statement and final plans should make clear that winter recreation opportunity spectrum settings do not preclude travel planning decisions. The final plans should explain that site-specific travel planning is needed to determine where within semi-primitive motorized, roaded natural, and rural areas over-snow vehicle use will be allowed. Chapter 10 section 11.2 of the recently revised Travel Management Planning directives state "The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis." Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 CFR Part 261.14. Given that application of the minimization criteria are not part of the process wherein recreation opportunity spectrum classifications are assigned, recreation opportunity spectrum classifications cannot serve a dual purpose as over- snow vehicle area designations.

Response: The revised forest plan does not preclude any current, or future, travel planning decisions. Forest Service travel planning handbook direction states:

> "Approval of a plan, plan amendment, or plan revision should not include a final decision designating roads, trails, or areas for motor vehicle use or over-snow vehicles use or otherwise restricting those uses. Rather, the land management plan provides information and guidance for travel management decisions" (Forest Service Handbook 7709.55 chapter 10, section 11.2).

The revised plan will not designate winter motorized uses but does provide a winter recreation opportunity spectrum map (final plan, appendix A) that displays the winter recreation opportunities and settings currently found on the Inyo. During a project-level analysis, subpart C of the Travel Management Rule, we will determine where winter motorized uses are authorized.