DRAFT NOVEMBER 13, 2014
Summary of Scoping Comments Received

Introduction

The U.S. Forest Service announced a 30-day public scoping period on August 29, 2014. This scoping period marked the start of the National Environmental Policy Act (NEPA) process for forest plan revisions on the Inyo, Sequoia and Sierra National Forests.

The scoping period gave the public a chance to tell the Forest Service what issues and concerns related to the Purpose and Need and Proposed Action they think should be addressed in the environmental impact statement (EIS) before the Forest Service begins drafting this document. Over 7,200 scoping comments were received, categorized and summarized by the agency. This document provides the summary of issues and concerns received during the scoping period. From this list, the Responsible Officials will determine the key issues. However, to prepare a range of conceptual alternatives to share at public workshops, the Forest Service reviewed the entire list of issues and concerns. This range of alternatives will be refined, including considering adding new alternatives, once the significant issues are finalized.

Terrestrial Ecosystems

Vegetation Treatments (Non-Fire)

- Concern that over-crowded stands of trees from a century of fire suppression have resulted in threat of catastrophic wildfire and risk of insects and disease outbreaks. Stand density of large trees must be maintained at acceptable levels to prevent unacceptable mortality from bark beetles and drought.
- Comment that the Science Synthesis produced specifically for these forest plan revisions is not evident in the 63 pages of Proposed Action. Instead what you find when you read the 63 pages is not much different than the existing forest plans as amended by the 2004 Sierra Nevada Framework. The Science Synthesis is clear that the forest vegetative density has to be dramatically reduced to return the forest to a heterogeneous pattern and to tree/acre densities of less than half the current densities.
- Request that the plan emphasize the goals of Healthy Forest Restoration Act (HFRA) to protect communities, watersheds and certain other at-risk lands from catastrophic wildfire, to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape and other provisions.
- Concern that the over-crowded stand conditions that have resulted from a century of fire suppression are having a drastic effect on the depletion of groundwater and the evapotranspiration of millions of gallons of needed water each year. The desired condition for retuning these stands to

historic conditions does not address this vital and critical issue to ecosystem health as well as addressing the Sierra Nevada and State of California's need for water.

- Request to return timber stands to historic conditions using the Malcolm North strategies (General Technical Reports 220 and 237).
- Comment that managed forests are essential to protect from fire.
- Request that managing for "old forest conditions" be minimized as that greatly puts these and surrounding areas and those habitats and species at risk. More thoughtful management should be encouraged.
- Comment that vegetation desired conditions underrepresent tree densities compared to best available science.
- Concern that desired conditions for dry mixed-conifer have California Wildlife Habitat Relationships (CWHR) 4D and 5D (moderate to large size trees with high canopy cover) too low to support species viability.
- Comment that mid-scale dry mixed-conifer desired conditions conflict with landscape-scale dry mixed-conifer desired conditions.
- Concern that vegetation guideline to protect old forest from fire by thinning is not consistent with viability requirements for species.
- Comment that components for vegetation types are inconsistent – some components are missing for some vegetation types. Some vegetation types specify scale in the desired conditions and others do not.
- Concern that targeting white fir for removal harms habitat for various species. White fir has a tendency to rot, creating cavities for many species to nest and roost.
- Request that the plan address blister rust that is killing sugar pines.

At-Risk Species

- Support for protection of habitat for at-risk species.
- Concern that coarse filter approach to habitat protection may not be appropriate to protect all species.
- Comment that current direction has not halted or reversed negative trends of at-risk species. Revised plans must provide for improving these trends.
- Request that the Forest Service analyze the Sierra Nevada Conservation Strategy submitted by Sierra Forest Legacy as an alternative.
- Concern that the geographic coverage and scale of species of conservation concern (SCC) management inordinately impacts other uses of the forest.
- Comment that there are social and economic impacts when protections for single or multiple species reduce or eliminate management options that could reduce the risk of catastrophic wildfire, promote healthier, watershed, and reduce the risk of insect and disease.

California Spotted Owl and Northern Goshawk

- Support for current proposed action related to California Spotted Owl (CASPO) protected activity centers (PACs) and home range core areas (HRCAs).

- Support for the current plan components related to goshawk.
- Request to consider increasing PAC size for Spotted Owl and Northern Goshawk because these species are being impacted by management, drought, human intervention and climate change.
- Request that goshawk standards include designating post fledging areas of approximately 420 acres around nest sites.

American Marten

- Request additional management direction for American marten.
- Request to develop a management area for marten between Mammoth Lakes and June Lake, west of 395, where old forest habitat structure is maintained and enhanced.
- Request that marten den and rest sites should be located within four years of plan implementation.
- Request to tie meadows and grasslands associated with small mammal prey base into marten management objectives.

Sage Grouse

- Concerns about impacts to large areas of sage grouse habitat.
- Request to limit grazing to enhance sage grouse habitat.
- Request to focus on ravens and wild horses as threats to the sage grouse.
- Request that desired conditions for sage grouse terrestrial habitat detail adequate nesting and brood rearing habitat.
- Request that forest-wide utilization standards be revised for critical sage grouse habitat.
- Request that plan components include wet meadow habitat, which are vital to the brood rearing life stage.
- Request that the plan include provisions for grass cover height for nesting habitat as well as brood-rearing habitat.
- Request to add provisions for Lek (breeding display sites) buffers to prevent disturbances to grouse breeding activities and provisions to prevent cheatgrass incursion throughout sage-grouse habitat.
- Request that for Standard #17, permittees should be responsible for let down at the end of the grazing period. Any new fences built in grouse habitat should be let down fence with fence markers. Unused and unnecessary fencing in sage grouse habitat should be identified and prioritized for removal.
- Request for a climate change and resource protection alternative where all vacant 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.
- Request to develop a Bi-State Sage-grouse Alternative for the Inyo National Forest where all authorized actions and components would be designed to: 1) protect remaining sagebrush and sage-grouse habitats and minimize collateral damage; 2) enable passive restoration of lands “at risk” of weed invasion and further losses of native species; 3) provide active restoration, specifically for removal of harmful livestock facilities that may damage sensitive species habitats, population and watersheds; 4) provide for active restoration of crested wheatgrass seedlings and cheatgrass to expand sage-grouse and other habitats.

Invasive Species

- Support for the identified desired conditions, strategies, and guidelines.
- Support for USFS coordination with stakeholders to educate the public regarding preventing introduction of invasive species to the landscape.
- Comment that it is unclear why “desirable non-native” species are included in the Proposed Action. Non-native species whether “weeds”, “invasive” or “introduced” are not a component of an intact ecosystem.
- Request that weed prevention measures be included, as necessary, when amending or re-issuing permits including, but not limited to livestock grazing, special uses and pack stock operator permits.
- Request under "strategies” to consider including data collection and sharing as an activity for coordination with adjacent landowners and stakeholders, including federal agencies.
- Request to incorporate stronger and more specific language requiring the use of weed free hay and other feed.
- Request to add standards for livestock rest purging periods, and measurable language on weed infestations (e.g., when weed control actions are triggered).
- Request to add an objective to create a cheatgrass management plan for the Inyo National Forest given the depth and breadth of cheatgrass invasion.

Vegetation Treatments (Fire)

- Comment that the community fire protection zone (CFPZ) and general fire protection zone (GFPZ) direction in the Proposed Action conflict with the old forest element components in the Proposed Action.
- Comment that the Proposed Action focuses on logging to reduce fire risk to communities, while neglecting to emphasize the need to increase fire prevention activities, all at the expense of habitat.
- Comment that fire zones need better integration with habitat conservation and vegetation management.
- Concern that implementation of fire management direction for CFPZs and GFPZs will have significant negative impacts on habitat.
- Request that the Detailed Proposed Action for Fire Management forest-wide strategies include adjacent federal agencies in the discussions of risk assessment across borders, in addition to tribes and adjacent landowners.
- Comment that defensible space for fire protection is needed near the communities and recreational nodes of the southern Mono County resort corridor.
- Comment that these three national forests can become the leaders in developing forest plans that boldly promote the use of fire and in roaded areas with less topography, mechanical restoration methods. We are at an absolute critical time regarding forest restoration. If we don't act in the next one to three decades, future managers may not be able to conserve these critical forests for future generations.
- Comment that almost 90 percent of every fire area is not salvaged and reforested, leading to a condition where brush is becoming the dominant vegetation cover, or a resulting conversion from forested acres to brush fields.

- Concern that not salvaging and reforesting fire areas has social and economic effects by reducing the amount of water available downstream for municipal and agricultural uses.
- Comment that the fire management modeling that constructed the four wildfire zones is well designed.
- Concern that the "average condition" used in fire management modeling is not what the forests should be designing their strategy to for the next ten to fifteen years. It is the 98 percentile wildfires that are causing the destruction. It is important to have a 98 percentile sensitivity test be run with the model to determine if there are substantial differences in the four zones (Proposed Action p. 43).
- Request that the plan describe desired condition of the vegetation on national forests in the Community Wildfire Protection Zones with fuel breaks, and the specific needs of ingress/egress for fire suppression and needs of safe evacuation routes for public safety.
- Request the Forest Service address the growing social and economic effects and impacts that catastrophic wildfire is having on recreational opportunity. Fire has consumed miles of area along the Pacific Crest Trail. The Forest Service should discuss the shutting down of recreation facilities or their loss due to fire.
- Request the Inyo National Forest develop an outreach and educational program that will help visitors and residents alike learn why fire activities are being used for landscape treatment projects.

Air Quality

- Request fire management decisions for resource benefits consider potential effects to local economies (tourism).
- Concern that uncontrolled wildfire is becoming a prime contributor to social and economic impacts. These impacts include seniors, school children and the general public having to eliminate or reduce normal life activities due to prolonged days of smoke and resulting particulate matter.
- Request the plan address collaboration on air quality issues with neighboring land management agencies.
- Request the plan address air quality in Class I Airsheds associated with wilderness.
- Request including direction related to the Environmental Protection Agency smoke management program.

Post-Fire Management and Complex Early Seral Habitat

- Request to reduce salvage logging. Nature regenerates these areas.
- Request the Forest Service let nature take its course, rather than rushing to salvage log where natural seedlings are present following fire.
- Concern that post-disturbance guidelines will likely contribute to declines in species viability. These are all in conflict with other plan components, or are ambiguous.
- Concern that salvage logging after fire diverts progress away from desired conditions.

- Concern that due primarily to the black-backed woodpecker issue, most burn areas are not salvaged or treated. Concern that re-burn results in high fire intensity that results in more run-off and silt delivery into watersheds.
- Concern that the Purpose and Need continues the mistakes of the past by emphasizing a hands-off approach to forest management; a more active management approach is needed to address wildfire impacts and provide for diverse sustainable uses.
- Request to consider an option that treats salvage harvest of timber as secondary to providing for wildlife habitat, soil productivity and ecosystem functions.
- Concern that the Proposed Action is biased against complex early seral habitat.
- Concern that the fire management plan accounts for black-backed woodpecker habitat needs.
- Concern that snag stocking levels throughout the Proposed Action are lower than indicated by best available science.
- Request to include standards that limit salvage logging to protect complex early seral habitat and fire-following at-risk species.

Riparian and Aquatic Habitats and Watershed Management

- Request for strong standards for protection and restoration of water resources.
- Request to address human waste impacts causing public health hazards on water resources.
- Request to protect roadless areas for watershed health.
- Concern that the existing standards and guidelines call for "staying out" of stream zones and allowing the vegetation to just get denser and denser and denser which is not desirable.
- Concern that the proposed 150 to 300 feet grazing exclusions adjacent to streams are too restrictive, inflexible and totally unnecessary.
- Concern that legacy and existing livestock grazing has altered aquatic ecosystems, particularly meadows. Request that the revised forest plans provide more stringent standards that ensure desired conditions are upheld.
- Concern that designation of riparian conservation areas will interfere with existing facilities which have been historically located much closer than the proposed 75 to 300 feet from perennial or intermittent streams.
- Concern that two age classes of hardwood shrubs do not represent "diversity." We suggest that "diversity" be quantified and representative of best available scientific information (BASI).
- Request for clear management direction to prevent and eliminate road impacts, which should include road closure if mitigation is not feasible.
- Request that no riparian conservation areas be designated in high density recreation areas. Rather, education encouraging public responsibility for resource protection, including recreation etiquette tips should be the focus.
- Request that the Proposed Action address the negative impacts of dispersed recreation in high use areas, including reduced water quality, over-consumption of fish, trampling, loss of vegetation and stream bank damage.

- Concern that prescribed fire and wildfire strategies recognize the role of fire in riparian ecosystem function. These strategies should also identify those instances where fire suppression has degraded riparian habitat or long term function of the riparian community, and increased the risk of large-scale, uncharacteristic fire.
- Concern was expressed on the emphasis on restoring fire in riparian areas. There is a belief that historically riparian areas experienced infrequent fire and are less fire adapted ecosystems than the surrounding communities.
- Request that California's endemic trout (Lahontan Cutthroat, Piute Cutthroat, Kern River Rainbow, California Golden Trout and Little Kern Golden Trout) have a management framework that protects and restores existing (and potential future) populations and their habitat.
- Request to include a desired condition and standards and guidelines to maintain barriers to non-native fish in good condition, where they are needed to keep native fish genetically separated from non-native species.
- Request for additional management direction for Willow Flycatcher.
- Request for adequate standards and guidelines to assist in the recovery of the two yellow-legged frog species and the Yosemite toad to avoid adverse modification of critical habitat.
- Concern that overpopulation of wild horses is affecting designated areas including riparian areas. There is a need for plan components to achieve sustainable wild horse populations.

Meadows

- Request that meadow ecosystems be addressed specifically with unique plan components based on their specific threats and stressors.
- Request to bring back standards that we have proposed for removal that protect hydrological function of meadows.
- Request that meadow management integrate soils, hydrology, with vegetation conditions, and address concerns to groundwater.
- Request that soil and water productivity components be better defined.
- Concern that the Proposed Action does not adequately address the overgrazing, mining, logging and fire suppression which have contributed to the decline of meadow ecosystems and hydrology in the Sierra Nevada, as evidenced by gullying desiccation, shrub encroachment and changes in plant species composition and diversity.

Tribal Relations

- Request to add language from the Purpose and Need to plan components: support economic opportunities in tribal communities and collaborate with the agency to meet restoration goals.
- Request to change tribal historic preservation officials to tribal historic preservation officers.
- Request to change language to reflect that cultural artifacts should only be collected for diagnostic dating purposes or for answering research questions if there are special circumstances that require this.

- Request to change desired condition language to stress protection and avoidance of cultural sites rather than identification and mitigation.
- Request to note that references to “tribes” should include both federally-recognized and unacknowledged tribal groups and organizations.
- Concerns were expressed about road closures limiting tribal access to areas such as Mono Lake and Rush Creek (where elders used to go for traditional uses but cannot get to any more).
- Concern about access to burial sites.
- Request to be more involved during plan revision and project planning and implementation.
- Request for more local tribal involvement in forest management, evaluation, and monitoring and protection of cultural sites and uses.

Benefits to People and Communities

- Comment that the national forests have wonderful wilderness areas and other special natural areas and wildlands that provide a wealth of ecological, recreational and economic benefits to our local communities.
- Comment that these lands are important to local communities for recreation, wildlife, water and as a resource of clean air. They are the basis of many local people’s recreation and livelihood.
- Comment that fire is a major risk to grazing and timber operations. These three forests have high fire risk due to high levels of human and vehicular use, as well as repeated exposure to lightning.

Recreation

- Support for specific kinds of recreation was expressed e.g., mountain bikes, motorized, non-motorized, human powered and quiet recreation.
- Many travel management comments were provided that are outside the scope e.g., changing trail access from motorized to non-motorized or vice versa, designating winter Recreation Opportunity Spectrum classes as a means of limiting over snow vehicle use.
- Request for separation of uses, primarily to enhance certain kinds of recreation experiences.
- Concern was expressed that wilderness recommendation will reduce access and opportunities.
- Requests for collaboration on recreation opportunities with local entities were received.
- Concern about conflicting opportunities across jurisdictional boundaries.
- Support for use of volunteers and collaboration for trail maintenance.
- Concerns about and support for use of pack goats were expressed.
- Concern that planning rule definition of sustainable recreation is narrower than Multiple-Use Sustained Yield Act (MUSYA) and National Forest Management Act (NFMA); concern that some currently allowed recreation activities could be considered not sustainable.
- Comment that the goal of connecting people with nature is too narrow; other positive aspects of recreational activity that might connect or strengthen family relations, or provide mental rest from daily work stress or provide a physical workout should be included.
- Request to expand recreation infrastructure such as campgrounds and campsites, and open additional roads and trails within the travel management system.

- Request to amend the guidelines section to clarify that the Forest Service will advocate for protection of in-stream flows for recreational values in addition to ecological values (e.g., kayaking and rafting).
- Request that natural soundscapes be included in the desired conditions (opportunities for quiet recreation).
- Request that desired conditions acknowledge the importance of opportunities for human-powered recreation activities like climbing, skiing, snowboarding and snowshoeing, mountain biking, paddling and hiking.
- Request exceptions to the 18 inch snow depth requirement for authorized uses such as accessing water and sewer infrastructure.
- Request that the forest plans reference the recreation residence program within the Sustainable Recreation section.

Collaboration and Partnerships

- Request that the plan and planning process address collaboration with the National Park Service in areas where administrative boundaries are shared.
- Request the Forest Service collaborate with partner organizations to provide sustainable recreation opportunities, and use volunteers and partners to prioritize and complete maintenance work that has been deferred way too long.
- Comment that the Forest Service can help protect and maintain recreation resources in this era of budget shortages by fostering partnerships with local organizations.
- Comment that partnerships can prove very valuable to the Inyo National Forest in carrying out the plan. They can be a source of collaboration, knowledge and ideas as well as an extension of the workforce.

Forest Products

- Comment that the southernmost medium-sized sawmill remaining in California has struggled since 2006 to have a sufficient wood supply to run the mill year around.
- Concern about the social and economic impact of fire on the general forest zone which eliminates or drastically reduces timber production.
- Comment that the implementation of the 2004 Sierra Nevada Framework for the past ten years has shown that professionals trying to apply forest health and fuels reduction treatments to the land are instead “walking away” from well over half of the available productive forest land. The Proposed Action would continue this policy.
- Concern that timber mills are dependent on at least the current level of harvest or they will close. No indication has been given how this harvest level will be maintained or increased.
- Comment that logging should be used as a management tool. Need to increase forest treatments if prescribed fire is going to be reintroduced both economically and safely within the millions of acres of areas designated as suitable for timber production.
- Request to shift emphasis from commercial logging to restoration of natural fire regime and ecosystems.

- Concern that the Proposed Action specifies logging even though logging has been shown to be harmful to the forest health by removing habitat and nutrients from the forest and does not reduce the risk of catastrophic fires.
- Comment that existing wilderness, recommended wilderness or wilderness study areas are not suitable for timber production.
- Request to include a timber objective; provide a timber suitability analysis and map of areas available for timber production. Develop yields commensurate with management standards and guidelines that are constraints to maximum sustained yield.
- Request to develop a standard identifying the maximum amount of timber that may be removed from the forest be included.
- Request that standards prohibit the practice of plantation reforestation and have diameter at breast height limits to protect the last remaining old growth trees and snags on the forest.

Designated Areas

Wilderness

- Support for more wilderness being recommended.
  - Protect wild and pristine lands for future.
  - Provide more quiet human-powered recreation opportunities.
  - Wildlife needs areas free of vehicle traffic.
  - Effects of climate change may be lessened.
- Request that all eligible areas be recommended for wilderness designation.
- Does not support additional wilderness recommendations.
  - Opportunities for mechanized and motorized recreation will be reduced.
  - There are other ways of protecting lands e.g., back country non-motorized management areas.
  - The local economy will be impacted.
  - Some areas being considered are not pristine.
  - Wilderness precludes all future opportunities for new multi-use trail options, improvements or realignments.
  - No additional wilderness should be added until the land is made ecologically healthy and resistant to uncharacteristic wildfire.
- Request that all inventoried roadless areas be evaluated for wilderness potential even if they include motorized routes.
- Request that additional areas be included in the wilderness evaluation.
- Request to include ecosystems that have less than 20 percent representation into the Wilderness Preservation System.
- Concern that management policies need to be changed to address current heavy use and projected increased use in order to protect wilderness values.
- Concern that wilderness designation would adversely affect timber supply and increase management costs due to lack of access.

- Concern that wilderness can create more dangerous wildland fires. With the closing of more roads there will be less access for fire suppression. Roads make excellent firebreaks!
- Concern that to protect adjacent private property and important watersheds, these types of areas should be kept out of wilderness consideration so that appropriate fire suppression measures and appropriate recovery measures can be applied.
- Concern that recommending wilderness will displace users and lead to crowding in other areas.
- Comment that lands in the wilderness inventory include a number of U.S. Geological Survey seismic stations, as well as several high-precision global positioning system stations operated by the UNAVCO university consortium, and these lands should not be recommended for wilderness designation.
- Comment that the second wilderness desired condition needs to specifically identify the "similar areas" that should retain wilderness character.
- Concern that mountain bikes will be prohibited in recommended wilderness.
- Request that in alternatives with recommended wilderness areas, the Forest Service allow existing uses that are not impairing wilderness values to continue (e.g., mechanized and motorized use of trails).
- Request that alternatives that recommend wilderness use cherry stems to allow current uses to continue.

Wild and Scenic Rivers

- Request that the Forest Service complete a comprehensive evaluation of all eligible rivers.
- Request that the Forest Service update existing management plans for designated wild and scenic rivers.
- Comments provided many suggestions about specific rivers to consider and provided river related values.
- Concern that recommendations for wild and scenic rivers might curtail fishing or fish stocking.

Pacific Crest National Scenic Trail (PCT)

- Support for identifying a corridor along the Pacific Crest Trail (PCT) as a specific management area, with protective standards and guidelines applied. The Recreation Opportunity Spectrum classes and scenic integrity objectives should be consistent with laws and policies for national scenic trails.
- Comment that the proposed action should be revised to define the trail corridor.
- Request that further consideration be given to designating the trail corridor as a management or geographic area. Comments are for and against this designation, with some in the middle depending on what the final boundaries and the standards and guidelines are.
- Support for the Pacific Crest Trail Association (PCTA) playing an active role in the management of the PCT and in setting goals for it in the plan.
- Concern over the role of the PCTA in the proposed action, that some guidelines may have inappropriately or illegally assigned governmental duties to a private organization, or may limit the ability of other groups to partner with the Forest Service.
- Extensive comments for and against the prohibition on bicycles using the PCT.

- Comment that it is important to retain the PCT as a hiking and equestrian trail, and not open it up to mechanized use, such as by bicycles, which have many other roads and trails available.
- Concern that current bicycle prohibition on PCT may be in violation of the Administrative Procedures Act, which guarantees public participation in the rulemaking process
- Request that the Forest Service evaluate the appropriateness of bicycles on a segment-by-segment basis in order to ensure that restrictions are employed only where necessary to ensure the sustainability of use.
- Comment that there is no need to prohibit foot races on the Pacific Crest Trail. Trail runners use the PCT every day along with hikers and horseback riders. Trail runners leave the PCT in the same condition as they found it in.

Other Designated Areas

- Request that Indiana Summit Flats be a research natural area because it is the largest unroaded pumice flat in the Glass Mountains.
- Request that the Forest Service consider supporting the designation of Highway 395 as a scenic byway.