18 November 2022

Erin Noesser Inyo National Forest 351 Pacu Lane, Suite 200 Bishop, CA 93514 Submitted via email: https://www.fs.usda.gov/project/?project=61827

RE: ESCCRP Mammoth donut comments

Dear Erin, ID team members and project partners,

Thank you for this opportunity to provide comments on the ambitious ESCCRP project. While colloquially referred to as the "donut project," the project area spreads across the landscape a good deal beyond the Town of Mammoth Lakes. The project area has become more of a croissant than a donut.

While the goal of reducing the potential of uncharacteristic wildfire and improving forest health and resilience around is needed, laudable and wholly supportable, an overall concern about the size and scope of the project emerges when you consider the croissant. It seems that reducing the project size back to a project area resembling a donut could lead to more timely, finely-tailored and realistic achievement of the project goals.

While I support the project with its refreshing programmatic approach, it's thoughtful aims and careful analysis, I am worried that the sheer scope of what is being planned may impede the very real need for action directly surrounding the Town. This concern for expedient implementation where most needed could be addressed by the creation of a prioritization matrix which considers proximity to town, potential ignition threats, habitat types, resulting defensibility gains, and possible habitat improvements.

Following are comments by document section.

Background and History

The document fails to acknowledge the significant role played by past commercial logging activities within the project area. The current forest condition is not due solely to fire exclusion but a series of actions and inactions. Logging activities beginning with mining in the 1870's to large-scale even-aged cuts of the 50's to the 80's have contributed to the current forest condition and deserve to be acknowledged.

Project Overview

While the Forest acknowledges that this project will play a role in preparing forests for the landscape-level reintroduction of fire as envisioned by the long-awaited *Eastern Sierra Fire Restoration and Maintenance Project*, this collaborative relationship between fuels treatment and fire could be made clearer in the current project overview.

Specifically, please add a bullet identifying "Enhanced reintroduction and use of prescribed and natural fire as a management tool across the project area" to the listing of "ecosystem and community benefits" on p7. Prescribed *and natural fire* are critical tools in the

forest management tool box. This notion is identified in the purpose and need section, but should be identified as a specific beneficial outcome right up front.

Relationship to INF LMP and Other Projects

As above, thank you for identifying the *Eastern Sierra Fire Restoration and Maintenance Project* connection to this project. Please add "*and natural fire*" to any mention of prescribed fire. Fire use is perhaps the *most* cost effective and ecologically valuable land management tool available. Fire use has been effectively employed in the Glass Mountains, John Muir and Ansel Adams wilderness areas, as well as regional National Parks. It is time to bring it back to the Eastern Sierra. This project will be key to setting the landscape up for fire use reapplication.

Planning Approach

The project's combination of programmatic planning and phased implementation is to be lauded and supported. However, this section should indicate how the annual treatment acres will be identified. What is the decision matrix for identifying where and how areas will be treated annually and over time? What factors will be considered - ignition threat, distance to structures, creation of contiguous, linear fuel breaks, concentrated recreation areas, habitat needs? A programmatic plan for how the projects will roll out on the ground is a critical piece if this project is to achieve protection of communities and restoration of forest health while sustaining critical public support.

Proposed Action

A general comment on the proposed action section echoes the general concern about the sheer size of this project. The map shown on p12 is at such a large scale as to be somewhat meaningless. Critical emphasis areas such as meadows, riparian areas, Whitebark Pine stands, CWPZs, and IRAs are not illustrated at all. Additionally, the emphasis area forest types illustrated are so general they crumble under a cursory field review.

For example, the area between Deadman Dome and Deer Mountain is shown as Jeffrey Pine, Red Fir and Other while a field visit reveals a diverse forest of Whitebark Pine, old growth Lodgepole, Western White Pine, White Fir and a smattering of Red Fir on the far eastern boundary of the Wilderness Area.

Meaningful public comment and effective project implementation require meaningful forest type classifications and resultant mapping to ensure a planned treatment matches the reality on the ground. This site-specific ground truthing is mentioned later on in the document, but a question of how effective and transparent these surveys will be remains.

While a single color denotes "Jeffrey Pine Forest," extensive variability exists within the Jeffrey Pine Forest on a meso- and mirco-scale across the project area. For example, the Jeffrey Pine forest south and west of 2S025 contains a higher proportion of heterogeneity than the forest to the east of this road. This change reflects the age and type of past commercial logging and, in all likelihood, subsequent plantation actions. Additionally forest structure, age-class distribution, species diversity and vegetative complexity increase from the eastern edge of the project area to the western edge. Consideration of site-specific forest conditions will be critical to ensure

effective restoration outcomes while preserving current forest habitat functions and structural diversity across all scales.

Treatment Summary Table

For all planned treatment types, please add an action to "identify and retain outlier conifers within the treatment unit."

Across what many people see as monospecific forest there exist pockets or individuals of different conifer species living far from their brethren well outside their expected range. These **outlier conifers** represent the ongoing process of landscape level dispersal. For example, an arc of whitebark pines – individuals and a few clumps separated by a ¹/₄ to a few miles from one another – extends from the area of White Wing in the Owens River Headwaters Wilderness to Deadman Dome into the Jeffrey pine forest east to a now burned 200 year old individual at the junction of the Pilot Springs road to 1S04 and still east to Sentinel Meadow and beyond to Glass Mountain peak.

These individual whitebark islands (and by extension, islands of Western White Pine, Red Fir, Sierra Juniper and Mountain Hemlock) represent dispersal in action; this is how trees move and how trees adapt, spatially, to our changing world. When implementing project work, planners, botany staff and timber crews should be made aware of these outlier conifers that seemingly "do not belong," and efforts to protect and retain them must be incorporated in site-specific project planning for each emphasis area treatment prescription.

Additionally, each treatment prescription should include enhanced language and density requirements for snag retention and creation. These ecologically critical and locally limited dead, standing trees are all too often needlessly removed.

Jeffrey Pine Treatment Summary -

- Please add "and retain" to the second bullet to protect and retain old-growth Jeffrey Pine.
- Please add snag retention language to the final bullet to "reduce dead tree density..." so areas of standing dead are not turned into matchstick fields like recently happened at Inyo Craters. Standing dead trees represent habitat for today and tomorrow and must be retained at thoughtful, stand-specific and ecologically-beneficial densities.
- Add language to "Preferentially identify and retain outlier conifers within project stands."

Dry Mixed Conifer

• Add language to "Preferentially identify and retain outlier conifers within project stands" to the retention of Jeffrey Pine. In this emphasis area, these will tend to be isolated Sierra Juniper, Western White and Whitebark Pines.

Lodgepole Pine

• Add specific language to retain all living trees with existing wildlife cavities.

Riparian Areas

• Add language a "release and preferentially retain any and all broadleaf trees from encroaching conifers."

• Add language to "Retain all large diameter (>16") conifer and broadleaf snags."

Aspen

- Add language requiring retention of all "cavity-containing snags" regardless of tree species.
- Add language to "consider topping of encroaching conifers at 4-12' of height rather than full removal to create snags for wildlife within Aspen groves."

Whitebark Pine

• Treatments in this area should receive minimum priority, as these areas are generally far removed from communities, contain the most fragile soils, present the low fire threat due to extensive tree spacing, and, while Whitebark's exhibit some concentrated areas of die off, these areas consistently exhibit ongoing natural regeneration below these "ghost forests" across the project area.

Tree Mortality

• These areas must be treated more thoughtfully than the recent project at Inyo Craters where large diameter snags were felled for no reason. These mortality areas present important wildlife habitat for Black-backed woodpeckers, as well as other Picidae and mammals. If the recent Inyo Craters project is to be an example of what is to come, the project will quickly lose public support and ecological justification.

Table 2 - The snag range from a minimum of 2 to a maximum of 40 across 10 acres is paltry and arbitrary. Two snags across 10 acres seems ecologically insignificant and scientifically indefensible. The 1988 Forest plan required maintenance of 2.2 snags PER ACRE of dbh 16-24" and .5 snags of >24" per acre in uneven-aged timber management areas. Expanded to 10 acres this would yield a minimum of 22 snags at 16-24" Dbh and 10 snags /24" Dbh. Given that a goal of this project is to enhance wildlife habitat, please increase the minimum number of snags across all emphasis areas. Additionally, please include language to "retain all snags above 30" dbh."

Implementation plan and monitoring

Thank you for noting the ongoing cycle of outreach on the annual implementation plans. These annual outreach activities should include review of not just planned, but ongoing and past actions in the field. The adaptive management approach as described sounds potentially beneficial to the project's iterative implementation.

One piece that seems to be missing is an articulation of the oft-referenced "prioritization criteria." These criteria and their application should be identified in the document.

The interaction of this project and the ESFRMP discussion is appreciated. It will be wonderful to see this project enable effective implementation of the ESFRMP.

Design Criteria

Botany - Please add "identification of outlier conifers within project stands" to this thoughtful list. Retention of these outlier conifers is critical to the natural dispersal of conifers across the landscape in these times of change. Please make "outlier conifers" a target species for surveys.

Please add criteria to "Retain and protect limited shrub understory in treatment units where shrub understory covers less than 10% of the ground surface by limiting felling and mechanical activity away from shrub cover and into areas of needle-duff or bare soil." Many of these treatment units are so shaded and duff-deep that shrubs such as bitterbrush, tobacco brush, and manzanitas have become relatively rare in overstocked forest stands.

Hydrology/Soils - Thank you for the restoration language at WTR-14 and -18. These are critical project components.

Special Habitats - Thank you for calling out pumice flats as a special habitat; they are. The use of project generated material for vehicle barriers is thoughtful, effective and much appreciated. Please add "outlier conifers, individuals or stands" as a special habitat to be identified and retained through project implementation.

Wildlife - Yosemite Toads occur in Deadman Creek. Project activities in this area should be designed accordingly.

Thank you for the raptor and migratory bird LOPs. These LOPs should not be voluntary but required. Please delete the word "may" in WFL-02 and -03 so the criteria read: "A LOP *will* be established during the primary nesting period." These LOPs should be SOPs. These LOPs may be modified based on seasonal conditions and resurvey of a given area in the late summer months.

Please consider adding language requiring retention of cavity-bearing trees regardless of dbh.

For mule deer, the project should consider retention of higher tree densities along known migration corridors and within known staging areas to retain existing thermal and visual cover. Additionally, an LOP for fall migration along known corridors should be developed and implemented.

Thank you all again for your collective work to move this project forward and advance forest resiliency on the Inyo National Forest.

Respectfully, Paul McFarland Lee Vining, California