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Comments: Thank you for considering these scoping comments. I am traveling so must be brief.

I question several aspects of this project as proposed, in terms of justification, selected ecotypes and locations for treatment, specifications and justification. The rationales given in various statements in the proposed action, while being perhaps accepted as standard agency practices, have been challenged by numerous scientific studies and publications.

Examples, (paraphrased):

- "The red fir forest is overly dense and needs thinning." Thanks to intensive effort by the initial Friends of the Inyo participants, the red fir forest was given protection by the forest service from entry for logging some 35 years ago and remains one of the most biodiverse and complex in stand structure on the Inyo. Its cool density makes it more fire resistant than second growth pine and mixed conifer. Please leave it be.

- "Beetle-killed trees" are a fire hazard and threat to forest health and should be removed. These snags, which quickly lose their needles and the moist logs they turn into, are one of the most valuable contributors to species diversity on the forest and less likely to spread fire than live resinous trees. Leave them standing.

- Large diameter trees (24" to 30") "should be thinned" - I disagree; these trees are the future old growth on the forest, but if logged, the forest that would remain after thinning would be hotter and more likely develop shrub ladder fuels invaded by non native grasses.

"Pinyon pine is expanding and therefore needs logging." Pinyon pines support unique and threatened species such as pinyon jays and are a unjustifiably maligned forest ecosystem, in need of protection throughout the Great Basin and Southwest.

I incorporate by reference the book SMOKESCREEN, by Chad Hanson, (2022).

It raises the above arguments and many more about the direction "fuels management" has taken, with an extensive bibliography of scientific studies, reports and publications which I hope project managers will carefully review and consider.

Thank you very much,

Ilene Mandelbaum