

Talking points for public meetings in September 2014 (Joint effort of FOI, ROLG, CNPS, FoR, and FLG)

The term “restoration” is used a lot in the Notice of Intent (NOI) and Proposed Action, but it is not clearly defined. We see that “restoration” (for example, salvage logging) is proposed that actually harms wildlife and important habitat. The forest plan needs to be clear on what restoration is and how loss in ecological value is justified by “restoration.”

The Proposed Action Should be Revised to Address the Following Issues

Conservation of At-Risk Species

This needs to be emphasized in the revised forest plans because so many species are negatively affected by forest management and human actions. Protecting the health and persistence of wildlife species is critical to safeguarding ecosystem health and ecological integrity. Each forest has a high number of species identified as at risk in the forest assessment (federally designated and potential species of conservation concern):

These species cover a variety of forest habitats and are threatened by numerous management activities. This is an emphasis area on its own. **The Proposed Action fails to address most of these species. For the species that are addressed, the Proposed Action is likely to result in increased threats and further negative impacts to the wellbeing of these already imperiled species.**

National forest	# of Species
Inyo	92
Sequoia	163
Sierra	93

Forest Ecosystems

Salvage logging destroys important habitat. **The Proposed Action fails to include measures to protect post-fire habitats important to woodpeckers and other fire-following wildlife.** Direction is needed in the revised forest plans to protect this habitat.

Fire is an essential process that shapes the landscape. The current plans prevent us from using fire to manage the forest and other habitats for ecosystem benefits. **The Proposed Action allows for the greater use of managed fire, but does not go far enough in promoting its use.**

We need all types of fire – low, moderate and high severity. **The Proposed Action limits achieving this mix of fire effects on much of the landscape, including in areas where such effects were part of the natural system.**

Logging of trees can remove habitat for at risk species. **The Proposed Action provides little direction on how the agency will safeguard imperiled wildlife by providing good quality habitat for their needs.**

The use of herbicides removes important shrubs and understory plants from forested areas. **The Proposed Action does not provide the necessary direction to ensure the conservation of these early seral conditions.**

Meadows and Riparian Areas

Roads and trails have negative impacts on stream condition (e.g., erosion, changing drainage patterns). The Proposed Action eliminates important standards designed to prevent degradation of meadows. **The Proposed Action needs to include the existing standard that requires the maintenance of hydrological function for meadow systems and needs to provide clearer direction to trigger effective agency action when the negative effects of roads must be eliminated. The Proposed Action should require that roads and trails be closed until negative conditions are fixed.**

Livestock grazing has a negative impact on meadow systems by trampling meadows, springs, fens and seeps. **The Proposed Action does not provide direction to reduce impacts to meadow systems and at risk wildlife. The Proposed Action should state that if grazing is not managed to avoid impacts, the livestock must be removed.**

Livestock grazing damages woody shrubs in meadow systems. These shrubs are essential habitat for some birds (e.g., willow flycatcher). **The Proposed Action should be changed to prevent livestock from damaging woody shrubs.**

Great gray owls, a rare and at risk species, depend on trees in meadow margins for nesting and foraging habitat. Some approaches to meadow restoration focus on logging these trees. **The Proposed Action should include clearer direction on how to protect these important habitat elements for great gray owls in places where logging is proposed.**

At-risk species associated with meadows (e.g., Yosemite toad, willow flycatcher, and great gray owl) have significantly declined in the planning area, yet the Proposed Action does not change how the Forest Service manages meadow habitat for these species. **The Proposed Action should be revised to include standards that will reverse the decline for meadow associated species.**

Dispersed recreation areas near streams and meadows can have negative impacts on these resources (e.g., trampling, loss of vegetation, streambank damage). **The Proposed Action needs to have clearer direction about limiting this damage and shifting recreational use to other areas so that no area is damaged by overuse.**

Eastside Habitats on the Inyo National Forest

Essential habitat for sage grouse, an imperiled species, is being damaged by livestock grazing. Livestock grazing needs to be prohibited in these essential areas. **The Proposed Action needs to limit grazing in areas where sagebrush restoration is undertaken. The Proposed Action also needs to direct the protection of habitat that provides nutrition for egg-laying hens and foraging chicks.**

Protecting Roadless Areas

Areas that are undisturbed by roads or have few roads are important to protect for watershed health and other habitat values. The forest plans need to identify these areas and provide protection from road building and other actions that can harm their ecological values. **Tell the Forest Service about specific roadless areas that you want to see protected.**

Designated Areas

Designations of new areas such as recommendations for wilderness, research natural areas, special interest areas and other special areas need to be made now in the forest planning process. The Planning Rule requires the Forest Service to assess the potential need and opportunity for additional designated areas, which then enables the Forest Service to designate additional areas as needed. The opportunity for establishing new designations is not addressed in the NOI or Proposed Action. If designations are not made now, management actions could degrade or destroy values. **Tell the Forest Service about any areas you think should be recommended for wilderness or another special designation and encourage them to evaluate the need for additional designations.**

Roads and Infrastructure

Roads fundamentally affect the ecological health and integrity of terrestrial and aquatic systems. The Planning Rule requires consideration of sustainable placement and management of roads and other infrastructure as well as requiring that sustainable access be provided within the forest. Plan revision will not achieve this if roads are not considered as a primary topic area in the NOI or Proposed Action. **The Proposed Action should be revised to provide guidance on infrastructure (e.g., roads, facilities).**

The Forest Service is required to complete a travel analysis of each national forest road system to identify those roads that are no longer needed and can be closed. This information should be incorporated into roadless inventory and wilderness evaluation. **Tell the Forest Service to complete the travel analysis on the Sierra and Inyo National Forests for use in revising the forest plans.**

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