

MAMMOTH LAKES RECREATION (MLR)

SPECIAL BOARD MEETING

SUNDAY, June 29, 2014

4:00 p.m.

**NOTE MEETING LOCATION**

**Mammoth Lakes Tourism Conference Room**

**2510 Main Street**

**Mammoth Lakes, CA 93546**

NOTE: In compliance with the American with Disabilities Act, if you need special assistance to participate in this meeting, please call (760) 934-4932. Notification 48 hours prior to the meeting will enable MLR to make reasonable arrangements to ensure accessibility to this meeting. (28CFR 35.102-35.104 ADA Title II)

NOTE: All comments will be limited by the President to a speaking time of five minutes.

**ROLL CALL**

Board Members: John Armstrong, Treasurer Jo Bacon, Teri Stehlik, President Danna Stroud, Elizabeth Truax, Secretary Rick Wood, and John Urdi.

**PUBLIC COMMENTS**

**ADMINISTRATIVE ITEMS**

1. Review and possible action on letter to Forest Service regarding Forest Planning Process.

**ADJOURNMENT**

To the next meeting of the MLR Board scheduled for Monday, July 7, 2014.

I hereby certify under penalty of perjury under the laws of the State of California, that the foregoing agenda was posted on the Mammoth Lakes Tourism outside door not less than 48 hours prior to the meeting. Dated this 26th day of June, 2014.



Jo Bacon, MLR Treasurer

June 29, 2014

Mr. Mike Dietle  
Land Management Plan Revision  
U.S. Forest Service  
Ecosystem Planning Staff  
1323 Club Drive  
Vallejo, CA 94592

Transmitted via email: [R5planrevision@fs.fed.us](mailto:R5planrevision@fs.fed.us)

To the Regional Planning Team:

Please accept these comments for the U.S. Forest Service Forest Plan Revision as submitted by Mammoth Lakes Recreation (MLR). As brief background, MLR is a recently formed 501c3 organization based in Mammoth Lakes, CA with a focus on enhancing and improving the recreation assets that sustain our community's tourism-based economy and quality of life. These assets include many found on the Inyo National Forest. We are currently negotiating a contract with the Town of Mammoth Lakes to administer funds generated by two special tax measures to be used to enhance Mammoth's recreation product. As such, we are submitting comments on the updated "Need to Change" topics, specific to the Inyo National Forest.

While all of the topics identified in the "Need to Change" process are important to the sustainability and overall health of the Inyo's ecosystems, our comments are directed to those topics we feel we have knowledge of and experience with and where we might have substantive information to share. This document begins with general responses to the questions posed on the USFS Feedback Form and then moves into specific concerns relative to topics we have identified as high priority based on our areas of interest.

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## **A. Feedback Form**

### **1. High Priority Topics in "Need to Change"**

The following high priorities we identify are specific to the Inyo National Forest:

- a. Ecological Integrity of Terrestrial Ecosystems  
We support the focus on specific Eastside conditions that are different from those on the Sierra NF and Sequoia NF. An important note to the process is the need to use science that is more relevant to the Great Basin conditions than that used during the Science Synthesis portion of the forest plan revision process completed in 2013. We support the recommendation to incorporate updated science into the management direction to better facilitate restoration.
- b. Fire
- c. Recreation

- d. Water
- e. Air

2. How should the Forest Service restore forests so that ecosystems and communities are more resilient to changing climates and uncharacteristic wildfires?

While we are not experienced in the science of ecosystems, we do recognize that our economic sustainability and quality of life is dependent on the health of our surrounding ecosystems. We are supportive of the ongoing development and implementation of a fuels management program on the Inyo NF, but also recognize the need to consider using fire as part of the ecological process. We would encourage the Inyo NF to collaborate with surrounding communities in the development of a communication and interpretive plan that explains the value low and moderate intensity fire plays in the health of the forest.

3. How can the Forest Service work with partners to improve recreation opportunities?

We encourage the development of a partnership handbook that serves as a guideline for identifying where partnerships can be effectively and efficiently integrated into forest management. In the 1988 Plan for the Inyo NF, partnerships were hardly mentioned because of a robust and healthy federal budget that funded many important programs including interpretation, trails maintenance, wilderness rangers, etc. Today that level of funding has shown a decline for over ten years and it is doubtful the trend will change. We are tracking recently introduced legislation in Congress that might remove some of the existing barriers preventing the forest service from utilizing partners in a more significant manner. As a potential partner for the Inyo NF to utilize, we are hopeful the culture of the agency will continue to evolve in realizing the important role that partners will play in bringing financial resources, professional skill sets and volunteer workforces to help improve recreation and ecological restoration opportunities.

4. Are certain topics presented in the updated "Need for Change" unclear?

Specifically the Wilderness topic and process is unclear and needs a better outline for how and where wilderness is going to be considered and possibly designated.

5. Did the assessments identify new information or changing conditions not addressed in the updated "Need to Change?"

We believe the majority of new information shared during the assessment phase of planning was brought forward and included in the updated "Need to Change." However, we would like to point out the need for economic analysis in addition to the scientific analysis that has been used as part of developing the "Need to Change."

6. Is the updated "Need to Change" supplement document missing scientific information?

There is still a need to indicate that science relevant to the Great Basin has been integrated into the science information being used to rationalize the "Need to Change" document.

## **B. Need to Change Topic Comments**

Below please find MLR's comments specific to the recommendations developed for the identified areas in the "Need to Change" analysis. We have pulled out certain

recommendations from each emphasis area and provided comments. This is not to mean all the recommendations aren't important, but rather to reflect MLR's areas of interest and concern.

#### 1. Plan-wide

No comments to submit

#### 2. Ecological Integrity of Terrestrial Ecosystems

- Incorporate updated science into management direction to better facilitate restoration.

**MLR supports and encourages the integration of science relevant to the Great Basin into the Inyo NF forest plan.**

- Add plan strategies that emphasize large landscape restoration, including emphasis on cost effective stewardship contracts to improve implementation likelihood.

**MLR supports and encourages the Inyo NF to fully explore opportunities to utilize stewardship contracts with local non-government organizations (NGO) to assist with restoration projects. MLR also urges the integration of sustainable recreation concepts into ecological restoration efforts on the Inyo NF due to the amount and diversity of recreation on this forest.**

- Align protection and management strategies and objectives for aquatic and riparian areas with adjacent strategies and objectives for upland areas, particularly in regard to ecological restoration and fire management.

**MLR supports and would add sustainable recreation to this comment along with ecological restoration and fire management. The Inyo NF experiences diverse recreation users that encompass aquatic and riparian areas along with upland areas and any protection and management strategies developed for these areas should consider opportunities to integrate sustainable recreation concepts.**

#### 3. Ecological Integrity of Aquatic and Riparian Ecosystems

- Incorporate strategies to prioritize restoration of aquatic and riparian ecosystems to improve resilience to climate change, fire, ozone and nitrogen deposition.

**MLR supports and encourages prioritization of restoration of meadows as a significant element of aquatic and riparian ecosystems. It has become evident during the drought we're currently experiencing that healthy meadows play a key role in sustaining the health of the overall ecosystem and important to ensure meadows are performing as needed and functioning well in this ecosystem.**

#### 4. Water

- Update plan components and geographic restoration focus, where needed, to meet or maintain water quality objectives.

**MLR supports and encourages the Inyo NF to consider integrating Mammoth Community Water District water quality objectives into the plan where appropriate due to the close relationship between Mammoth's water supply and the forest.**

#### 5. Air

- Add or refine plan components to incorporate smoke tradeoff analysis with varied types of restoration projects, including biomass utilization, planned ignitions (prescribed fire and pile burning), and unplanned ignitions (wildfires and wildland fires managed for resource benefits)

**MLR supports the need to introduce fire into the ecosystem as a management tool, but would encourage collaboration with local communities to develop important messaging around potential impacts including smoke.**

#### 6. Invasive Species

No comments to submit.

#### 7. Fire

- Include a risk-based fire management approach into the plans that incorporates wildland fires managed for resource benefit, restoration and maintenance of fire in adapted ecosystems, and new fire science on how threats to the wildland urban interface are assessed and addressed (fire-adapted communities), and how the zone is defined.

**MLR supports**

#### 8. Carbon

No comments to submit.

#### 9. At-Risk Species

- Consider new information, recommendations in conservation strategies, and project design criteria in developing plan components that could contribute to the recovery of federally-listed species (candidates and proposed) such as fisher and three sierra amphibians.

**MLR supports**

- Update plan components for the Inyo NF to provide for consistency, where applicable, with the Humboldt-Toiyabe forest plan amendment for greater sage grouse.

**MLR supports and encourages based on the potential impacts with the proposed listing of the bi-state sage grouse.**

#### 10. Range

No comments to submit.

#### 11. Timber

No comments to submit.

#### 12. Recreation

- Update Recreation Opportunity Spectrum classes to reflect desired use and any designation or use changes that may have occurred over the years.

**MLR supports**

- Update plan direction where current guidance is absent or partial, such as to guide the transition of winter resorts to year-round use.

**MLR supports and encourages collaboration with the surrounding community to update any new plan direction.**

- Develop plan components to focus agency efforts on each forest's recreation roles and contributions to reduce the deferred maintenance backlog.

**MLR supports and encourages integration of partners into the effort to reduce deferred maintenance.**

- Update plan direction to limit or redirect use in areas that are experiencing or are at risk for resource damage.

**MLR respectfully disagrees with this recommendation. While there is a need to protect high use areas from resource damage, we would offer some different recommendations to consider before the Inyo NF moves to limiting or redirecting use.**

- **The development of a partnership handbook that identifies steps for the Inyo NF to efficiently and effectively utilize the many partners in the region to help protect, maintain and restore risk areas.**
- **Many risk areas are important to the economic sustainability and quality of life for Mammoth Lakes. We support the development of management plans or strategies in risk areas including the Mammoth Lakes Basin, the Sherwins Area and Shady Rest. These management plans could be built off work already completed including the Lakes Basin Special Study (LABSS), the Sherwin Area Recreation Plan (SHARP) and winter access in Shady Rest. These efforts were community-based and identified recreation user trends, transportation issues and possible trail development that could be used to address ways to minimize risk. These initial efforts could serve as the baseline for a collaborative process that could lead to community-supported management plans. Rather than limiting or redirecting use through the revised forest management plan, we would encourage a collaborative effort that integrates outreach, education and stewardship components into management of risk areas.**

- Convert from the outdated Visual Management System (VMS) to the Scenery Management System (SMS) to incorporate concepts of sustainable scenic character.

**MLR supports and would encourage the Inyo NF to seek community input to affirm concepts of sustainable scenic character.**

- Incorporate the social and cultural aspects of "place" into forest plans.

**MLR supports and is willing to provide information from adopted municipal plans that could help with the integration of social and cultural aspects.**

- Incorporate strategies for working with partners to adequately protect and manage recreation settings, recreation opportunities, and valued visitor experiences.

**MLR supports and strongly encourages the development of such strategies through a collaborative effort that would bring together partners who have financial resources, technical skill sets and volunteer programs that would benefit the**

**efforts of the Inyo NF. In addition to the development of strategies, we support the evolution of the agency toward embracing the role partners will need to play in managing and maintaining recreation settings due to the financial constraints experienced by the Inyo NF through ongoing budget cuts. Demographic trends for the outdoor recreation industry show continued increases in activities such as hiking, mountain biking, camping, kayaking and SUP, cycling, cross-country skiing, ATV's and motorcycles. We encourage the Inyo NF to consider using identified groups that represent these various activities to assist with developing better management tools, maintenance programs and constituency building for public lands.**

- Incorporate guiding principles and goals from the National Framework for Sustainable Recreation into plan direction.

**MLR supports and strongly encourages the use of the framework in plan direction. We have been tracking its implementation since it was released a few years ago and as we are beginning to define our role in the region, we will be integrating many of its principles into our mission and work. We also support the concept of integrating sustainable recreation principles into any discussion about ecological restoration and believe the two efforts should be intertwined as much as possible throughout the forest plan.**

### 13. Cultural Resources

- Emphasize a more proactive approach to management of cultural resources by aligning management direction to the National Framework for Sustainable Recreation.

**MLR supports and strongly encourages integrating the use of partners to assist with the proactive approach.**

### 14. Lands

No comments to submit.

### 15. Wilderness

- Update and fill gaps in management direction for existing and recommended wilderness.

**MLR offers the following observations:**

- **The initial draft "inventory" maps are very confusing and seem to be lacking critical information including jurisdictional boundaries and existing designations and systems including trails and roads. We request the maps be updated with this information via available GIS layers before any further evaluation continues.**
- **It is confusing as to what the process will be for pursuing wilderness designation through forest plan revision. We request that the Inyo NF provide a better explanation for this process and identify key benchmarks in the process for the benefit of the public. Specifically, we ask the Inyo NF to explain what a "preliminary administrative recommendation" might mean to existing uses in areas that might be identified for wilderness.**

- We are very interested in participating in any discussions or evaluations about potential wilderness designations throughout the Mammoth Lakes area. We have some concerns about the proximity of potential wilderness to our community's urban growth boundaries and would like to be part of the evaluation process for such areas. Because a wilderness designation carries restrictions, we want to be sure evaluation and analysis includes impacts to recreation activities currently using public lands.
- The 2009 Wilderness Act designated thousands of acres of wilderness on the Inyo NF without providing any funding for management of the new wilderness. We will continue to monitor this situation and encourage the Inyo NF to identify ways they will be able to manage any new wilderness based on ongoing budget constraints.
- We offer the idea of considering other designations that might be available for the Inyo NF to use beyond wilderness designation. Other designations might be able to preserve the wilderness values we all desire without creating restrictions of use that might have negative impacts including increased demand on the Inyo NF to manage wilderness.

#### 16. Wild and Scenic Rivers

**MLR supports the need for the Inyo NF to complete the comprehensive river management plans (CRMPs) required for the two rivers receiving the new designation in 2009. It is imperative these CRMPs are completed in a timely and effective manner. We also encourage the use of local NGO's to assist with completing the CRMPs on these two rivers.**

#### 17. Pacific Crest National Scenic Trail

- Define the trail corridor, and ensure that strategies and objectives protect the recreation experience and visual resources.

**MLS supports this recommendation and strongly encourages the Inyo NF to collaborate with local NGO's to complete this recommendation. Anecdotal data shows an increased use of the PCT and protecting the recreation experience on the trail is a key focus of many of our visitors to the region.**

#### 18. National Recreation Trails

- Develop plan direction for National Recreation Trails.

**MLR supports this recommendation and strongly encourages the Inyo NF to collaborate with local NGO's to complete this recommendation. There is a benefit to the NRT designation that has not been fulfilled and we believe those benefits could be met through a more strategic approach for managing and maintaining the trails currently designated and also pursuing NRT designation for other trails on the forest that meet the criteria.**

### C. Areas Not Recommended for Change

MLR would like to provide the following comments on one emphasis area not recommended for change:

1. Infrastructure

**MLR agrees with the statement that the condition of facilities and the transportation system on the Inyo NF is poor. The large deferred maintenance backlog is a problem. We encourage the Inyo NF to consider identifying where they might be able to integrate the use of partners in addressing this backlog and establishing a process for prioritizing projects on the backlog.**

**D. Conclusion**

Thank you for the opportunity to submit our comments. While MLR may be a newly formed organization, many of our current board members have been actively involved in a variety of processes previously pursued on the Inyo NF including travel management, wilderness designation, planning, outreach and education. We are looking forward to engaging with forest leadership as our role in Mammoth Lakes expands and anticipate several future opportunities to bring beneficial resources to the efforts of the Inyo NF.

Respectfully submitted,

MLR Board of Directors

John Armstrong

Jo Bacon

Teri Stehlik

Danna Stroud

Betsy Truax

John Urdi

Rick Wood