

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

March 7, 2007

Jeffrey E. Bailey
Forest Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Subject: Final Environmental Impact Statement for Inyo National Forest
Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance,
Mono and Inyo Counties, CA (CEQ# 20070032)

Dear Mr. Bailey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the above document. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Selected Alternative will reauthorize special use permits for 12 existing pack stock operators and one outfitter/guide. EPA provided detailed comments on the Draft EIS (DEIS) for this project on May 16, 2006. We expressed concern with the potential for continued adverse water quality and resource effects of pack stock use at campsites, meadows, and trails with existing resource impairment. We recommended (1) relocation of Pizona Springs and Truman Meadows campgrounds from meadow and riparian areas to upland areas, (2) use of the Inyo National Forest Land and Resources Management Plan (LRMP) Amendment #6 forage utilization standards, (3) limited cross-country travel, (4) more rapid relocation of campsites and uses associated with resource concerns or that are within 100 feet of water, and (5) inclusion of a detailed monitoring and enforcement plan in the FEIS.

EPA greatly appreciates the Forest Service's decision to apply the LRMP Amendment #6 forage utilization standards for all pack stock grazing in the project area (Record of Decision), the inclusion of a detailed monitoring and enforcement plan in the FEIS, and the additional mitigation measures to further reduce potential water quality degradation from pack stock practices (Appendix E – Response to Comments, pg. E-74). We understand that wilderness campsites and uses associated with existing resource concerns will be relocated within 2 years of plan approval (Appendix E, pg. E-11). These additional management measures will ensure a more rapid recovery of impaired resources and help reduce the potential for adverse effects on beneficial uses of surface waters.

To further improve impaired resource conditions, we continue to recommend relocation of Truman Camp out of the riparian and meadow area to an upland location, and, where appropriate, limits on cross-country travel to ensure protection of sensitive resources. Where commercial pack stock use is clearly contributing to continued impairment of water quality, ecological function, and trail condition; we recommend realigning commercial pack stock trail use levels with the level of trail development and trail classifications.

We appreciate the opportunity to review this FEIS. If the Record of Decision is revised, please send one copy to the address above (mail code: CED-2). If you have any questions, please call me at 415-972-3846 or Laura Fujii, the lead reviewer for this project, at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/S/

Nova Blazej, Manager
Environmental Review Office

cc:

Doug Feay, Lahontan Region, RWQCB

Jacob Martin, US Fish and Wildlife Service, Sacramento