

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

January 30, 2006

Jeffrey E. Bailey, Supervisor, Inyo National Forest
Edward C. Cole, Supervisor, Sierra National Forest
Attn: Trail and Commercial Pack Stock FEIS
c/o Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 03514

Subject: Final Environmental Impact Statement (FEIS) for Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses, Inyo and Sierra National Forests, California (CEQ# 20050537)

Dear Mr. Bailey and Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

EPA commends the Forest Service effort to balance the multiple uses of the popular Ansel Adams and John Muir Wildernesses. Of note is the use of destination-specific controls that will enable more effective management response to specific resource concerns. EPA supports management actions that will address degraded meadows, campsites, stock holding areas, and trail conditions that contribute to water quality and ecosystem impairment.

EPA reviewed the Draft EIS (DEIS) and provided comments to the Forest Service on July 1, 2005. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) due to concerns regarding full compliance with water quality standards, the minimal improvement in water quality and ecological resources, and the lack of a detailed monitoring and enforcement plan. The FEIS responses to our comments have addressed many of our concerns and provided the requested information. Of note is Appendix A: Commercial Pack Stock Monitoring, Evaluation and Adaptive Management Plan Summary (Appendix A).

We continue to be concerned with the minimal improvement in identified degraded conditions in meadows, streams, and trails. Although the selected Alternative 2 - Modified would implement additional controls to reduce impacts at many destinations, it still allows commercial pack stock use in locations which are notably impaired such as Jackass Meadow (p. IV-280). Use limits should not be determined on the assumption that an area will not be grazed at the allocated high stock night numbers (IV-278). We recommend destination quotas and the maximum stock

nights be carefully aligned with the recovery needs of the resource as identified through monitoring, data evaluation, and the adaptive management process.

Appendix A appropriately includes tools that change management direction based upon monitoring and the assessment of resource conditions (Record of Decision, p. 53). Management changes include adding new destinations, increasing and decreasing destination quotas, and reopening meadows to grazing. The Record of Decision (ROD) should describe public involvement and environmental analysis requirements for adaptive management decisions.

The DEIS did not address environmental conditions at the pack stock stations or the effect of use authorizations on these conditions. In response to our request for this information, the FEIS states impacts at the pack stock stations and in areas outside the Ansel Adams and John Muir Wildernesses will be considered in the analysis to reissue the authorizing Special Use Permit for the pack station operations (p. C-64). We recommend the ROD clearly commit to this follow-up analysis. Of specific concern are potential effects of changes in use authorization on water quality, meadow conditions, and threatened and endangered species habitat at pack station locations.

We appreciate the opportunity to review this FEIS. When the ROD is finalized and signed, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov

Sincerely,
/s/

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

cc:
Doug Feay, Lahontan Region, RWQCB
Jacob Martin, US Fish and Wildlife Service, Sacramento