Range of Light Group
Toiyabe Chapter, Sierra Club
Counties of Inyo and Mono, California
P.O. Box 1973, Mammoth Lakes, CA, 93546

November 18, 2022

Erin Noesser
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514
Submitted via email: https://www.fs.usda.gov/project/?project=61827

RE: Scoping Comments for ESCCRP

Dear Erin Noesser:

The Range of Light Group (ROLG) is part of the Toiyabe Chapter of the Sierra Club and consists of over 400 Sierra Club members in Inyo and Mono Counties. We treasure our public lands, forests, and wildlife. On behalf of the Sierra Club's Range of Light Group Executive Committee, I'd like to express our general support of the Eastern Sierra Climate and Communities Resilience Project. The scoping document is a good project description. It is detailed, supports current understanding of forestry and wildfire science, and is clearly written. However, we have concerns about treatments in the Inventoried Roadless Areas and sage grouse habitat that we'd like to be more specifically addressed in the Environmental Assessment (EA).

Inventoried Roadless Areas

Our main concern is the proposed thinning of the forest in the Sherwins and in Solitude Canyon. We would prefer that the upper slopes and alpine habitats in the Inventoried Roadless Area (IRA) be excluded from this project as they have a low fire return interval departure, are inaccessible, have unique forest stands and climate refugia, and are adjacent to the wilderness boundary. According to C. Millar's comments on the Solitude Canyon Trail proposal, there is a stand of old growth western white pine that is rare to see in the Eastern Sierra along with limber pines in krummholz form, and old-growth mountain hemlock. There are willows and aspens along the talus bases. Will all of it be thinned? If the IRA is not excluded then the EA needs to be much more explicit in describing what is being proposed and how it will be achieved.

Western white pine is mentioned as part of the mixed conifer and red fir habitats and they are usually mixed in these forests as individual trees. However, there is a stand of western white pines in Solitude Canyon. It might help to think about treating it differently as a stand than as an occasional individual tree here and there. Please consider adding western white pine to the Table 1 Treatment Summary Table.

The EA will need to explain how the IRA will be thinned in detail and specifically what areas within the IRA will be treated, e.g., how far up the slope, what habitats, etc. What, if any, mechanical methods will be used in the IRAs? Where will the cable yarding system operate from, the motocross area at the base of the Sherwins? Will helicopters land anywhere on top of the Sherwins i.e., on

Mineral Ridge above Heart Lake, for instance? If helicopters are landing up there, then the walking back and forth to the helicopter landing pad will create a trail. That will lead to a permanent trail. The IRA treatment area is different enough it should have its own EA or Environmental Impact Statement.

Sagebrush Removal Concerns

Please clarify in the EA what is meant by: "WLF-08 Within sage-grouse habitat, 25-35% of sagebrush, shrub, native grass, and forb cover will be preferentially retained to provide adequate cover for sage-grouse." Maybe we are mis-interpreting it, but this statement indicates this project will remove 65-75% of the sagebrush within the project area. Except between the town and the base of the Sherwins where the motocross staging area and the Hayden Cabin are, most of the sagebrush is not near the town and does not pose a wildfire risk to the town or community assets. Please cite the studies that show that sagebrush removal is necessary and that 25-35% is appropriate cover for sage grouse.

From my observations, sagebrush mowing introduces cheatgrass and Russian thistle, which would create a worse fire hazard and would be a permanent loss of healthy habitat. Some of the sagebrush will grow back from the roots, some will die. The sagebrush will need to be mowed on a regular basis; not just once. Mowing sagebrush habitat along roads will only convert the road edges to cheatgrass and push cheatgrass further into the forest and closer to wilderness areas. The scoping document describes mowing along roads and community assets, but implies sagebrush removal will occur across all sagebrush habitat within the project. Mowing or clearing 65-75% of sagebrush within the project area will have a significant impact on all its wildlife inhabitants and create large areas of cheatgrass. We question whether the fire prevention advantages of sagebrush removal outweigh the incursion of cheatgrass. There are mountain bike and hiking trails in the sagebrush habitat. Will the edges of these be mowed as well or just the dirt and paved roads? What is the reclamation plan for replacing the sagebrush or will it remain weedy? How will the cheatgrass be addressed when it moves in after the sagebrush is removed? Will it be pulled or sprayed each year with herbicides?

Sagebrush habitat generally is a mix of sagebrush and bitterbrush. The Mule Deer feed on bitterbrush. The sagebrush habitat to the south of the town and around the Resurgent Dome are part of the migration path for Mule Deer and where the deer stage before they move into their summer or back to their winter range. Clearing the sagebrush will also remove the bitterbrush. Please include the impacts of bitterbrush clearing on the Mule Deer in the EA.

Bi-State Sage Grouse Habitat Concerns

According to the 2019 Final Record of Decision for the revised Inyo National Forest Land Management Plan, the Bi-state Sage Grouse becomes a species of concern if it becomes a candidate for listing. In May 2022 a U.S. District Court reinstated it as a candidate for listing. SPEC-SG-STD 01 in the plan supports habitat restoration for the sage grouse and promotes "a. …the maintenance of extensive, intact sagebrush communities; b. Limit the expansion or dominance of invasive species including cheatgrass…" Mowing sagebrush in Bi-State Sage Grouse habitat in the project area, which

would be the sagebrush habitat areas to the south and east of the town, is in conflict with these requirements. Please consider not mowing the sagebrush either along the roads or anywhere where there are sage grouse.

According to the data presented by USGS researcher, Dr. Stephen Mathews, in a recent SNARL webinar[1], the Bi-state Sage Grouse are in decline and at their lowest population level since 1995. According to the 2021 Greater Sage-grouse Monitoring in the Bi-State Distinct Population Segment Annual Data Summary (2008-21), the Long Valley sub-population has been contracting since 2008. The report indicates there are two active sage grouse leks by the Laurel Ponds. The report also indicates there are a lot of mortalities there. Dr. Mathews pointed out in his presentation that the biggest threat to the Bi-state Sage Grouse is nest predation by ravens. The loss of sagebrush cover will expose the sage grouse to more nest predation.

Human activity that comes with sagebrush and tree removal will also significantly disturb the sage grouse. A 2012 research paper[2] shows noise impacts the Greater Sage Grouse. It can make the sage grouse leave the area, interrupt their communication with one another, reduce their breeding success and increase stress to the point that they die. The study's recommendation is that noise not exceed the natural ambient noise level + 10 db. The tree removal should improve sagebrush habitat, but should be done manually; not with heavy machinery when the work is close enough to the sage grouse so as to exceed this noise limit.

According to the LADWP Adaptive Management Plan for the Bi-State Sage Grouse brood-rearing habitat on LADWP lands in Long Valley, the hens around the Laurel Ponds have early and late broods. Because of that, please consider a project activity blackout period through the summer, not just from March 1-June 15.

There are two leks along Hot Creek east of Highway 395. The sagebrush area on the east side of the Resurgent Dome and north of Hot Creek is covered in sage grouse scat—hundreds of old and fresh scat piles. There are many recent scat piles in the dirt roads between the airport and Doe Ridge as well. The sage grouse hens are nesting throughout this area and, according to the LADWP BSSG adaptive management plan, they have early and late broods. Please consider extending the project activity blackout period through the summer for this area too.

Sage grouse hens and broods have been observed crossing the east end of Antelope Springs Road and walking along it in the fall. This is one of two ways to reach the project area that will be thinned

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1 https://www.youtube.com/watch?v=WP8LLLEi2mk&feature=youtu.be

2 https://www.academia.edu/14133188/Recommended_management_strategies_to_limit_anthropogenic_noise_impacts_on_greater_sage_grouse_in_Wyoming or https://www.academia.edu/14133174/Experimental_Evidence_for_the_Effects_of_Chronic_Anthropogenic_Noise_on_Abundance_of_Greater_Sage_Grouse_at_Leks

around the Resurgent Dome. It would be better if the project staff and equipment came in from the west end of Antelope Springs Road to avoid the sage grouse.

KORE Mining will be drilling on the east side of the Resurgent Dome in summer 2023. The drilling activities will have an impact on the sage grouse in the area. Please don't add to the human disturbances by mowing sagebrush there. It is tall and healthy and provides excellent cover for the sage grouse. Even though there are roads into the area, please consider hand-cutting the trees to minimize the impact on the sage grouse or thinning during the drilling activity when all noise and activity would be masked by the more disturbing drilling activities. If the drilling occurs one year and then the thinning the next, will the sage grouse return to the area? They would after one summer of being forced out of the area, but multiple summers?

Mule Deer

The scoping document states there will be no project activities during the spring mule deer migration from May 1-June 15. Please explain why there wouldn't be a blackout period for the fall migration? There is a group of mule deer that spend a lot of the fall months on the east side of the Resurgent Dome. Mule deer also migrate through Mammoth and up into the Sherwins. The EA should include a map of the migration routes to show where the blackout period would apply.

Cultural Resources

The scoping document says you are working with the tribes regarding pinyon-juniper treatment and some of their cultural resources and we are glad you are. However, there are mill sites and debitage throughout the project area that may not be listed on the state or national historic/cultural registers. I know of two such sites within the project area and I'm sure there are others. The scoping document discusses how piagi collection sites and pinyon-juniper woodlands will be addressed, but not how lithic scatter or mill sites will be addressed. What is the plan for working around lithic scatter or mill sites? Ripping and hauling trees out with heavy equipment, clearing the forest floor, and mowing sagebrush will also clear away cultural resources lying on the ground. We think this needs to be addressed in more detail in the EA. The tribes should be able to document the sites at the very least before they are destroyed.

Groundwater Monitoring

The goal of this project is to increase the health of the forest by reducing the number of trees, i.e., "straws" drawing from the groundwater aquifers so that the trees that are left will not be stressed by drought. That implies that the groundwater level is expected to rise after trees and sagebrush are removed. The Mammoth Community Water District has data about how much water the town uses and the groundwater levels around the town. Maybe this would be a good project to establish a baseline depth-to-water level in the Dry Creek basin and baseline flows of Big Springs and the springs in the Devils Postpile National Monument. Then, after trees are removed, the water table and spring

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flows could be measured quarterly or annually to document the rise in the water table to see if the tree removal does indeed release more water into aquifer.

The Inyo National Forest could monitor the water levels in the wells on Deadman Creek and Dry Creek and the spring flows in the area. The Forest Service has several water rights in the area and should be able to get data on the state-controlled water diversions. There are three State Water Resources Control Board water rights along Deadman Creek and one on Dry Creek that are in the middle of the project area to be thinned: A019772, A019773, A019774. Together they allow up to 32,000 acre-feet/year to be used from Deadman Creek and up to 20,000 acre-feet/year to be used from Dry Creek. If this water is used for MMSA snowmaking and facilities, then the ESCCR project should assess the impact of that water use on the trees in the Inyo Craters/Dry Creek area. Which has the greater impact on the trees, the water diversions or drought? Are we removing trees so that the ski area can make snow?

We appreciate the hard work that has gone into this project from the start and the significant effort to involve all stakeholders. It is a good project and will go a long way towards protecting the Town of Mammoth Lakes, the wildlife, and scenic beauty of the area from a wildfire. It must also protect the Bi-state Sage Grouse.

Sincerely,

Lynn Boulton, Chair
Range of Light Group, Toiyabe Chapter
Sierra Club