



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



December 18, 2023

Mammoth Lakes Ranger District
Inyo National Forest
PO Box 148
Mammoth Lakes, CA 93546
Submitted via email: <https://www.fs.usda.gov/project/?project=61827>

RE: ESCCRP Draft EA Comments

The Range of Light Group (ROLG) is part of the Toiyabe Chapter of the Sierra Club and consists of 300 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 information in the Environmental Assessment (EA) on forests, forest health and forest management is very extensive and thorough.

While the EA provides a high-level plan with detailed prescriptions as to what the treatments will be for each type of vegetation, it doesn't get down to the project level. We think that is needed if this is to be the only NEPA process for the whole project for the next 15 years. Without this detail, the public cannot know if all the environmental impacts are documented in the EA. While the project's every intention is to continue public engagement at the start of each phase, it could break down. It will be up to each project lead to involve the public and the degree of engagement will vary project lead to project lead. The amount of public outreach is likely to dwindle with time and funding. While we understand the need to thin the forest before a catastrophic wildfire hits, an accelerated pace of the project through phasing should still take the time to do baseline surveys, a biological evaluation, and a landscape cultural resource survey as part of the EA.

Cultural Survey Needed

The whole Long Valley/Mammoth Lakes region was heavily used by the Numu for thousands of years as is described in the EA. It was a summer gathering spot for Tribes from outside of the area as well as local residents. There were ceremonies, gathering of materials and food, summer camps, etc. The forest treatments planned will impact any cultural resources on the ground: traces of trails, Piagi basins, lithic scatter, grinding stones, camp sites, rock rings, burial sites, etc. Those features will not survive the treatments. They need to be identified and protected or we will lose that cultural heritage. There needs to be a landscape level cultural resource survey with the EA.

The EA says the Heritage Implementation Plan (HIP) is the plan to address cultural resource concerns. Was the HIP accepted by the Tribes? If not, then will there be a Section 106 consultation with each phase? It isn't clear in the EA what guarantees that cultural resource surveys will be done, when, and by whom. If the cultural surveys are done phase by phase, then there may be fewer cultural resources in a smaller area that could be considered insignificant and not protected.



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Together, those smaller cultural resources may rise to the level of significance where they wouldn't in isolation. The Tribes should determine who does the surveys and where and if tribal monitors are needed. I wouldn't expect a logger to recognize an ancient trail or a burial site. There will be pressure to complete each phase as quickly as possible and possibly less time to consult with the Tribes or for them to respond in the phasing timeframes.

Sagebrush Removal Concerns

We have concerns about the severity of sagebrush removal in areas that are not adjacent to the town. We assume the mowing along roads is to create fire breaks; not to improve sage grouse habitat. Sage grouse should not nest along roads, so mowing along the roads is not to improve nesting, it would be to create fire breaks. The EA should identify:

- which roads will be treated with mowing for 50 feet on either side,
- which egresses/ingresses will be mowed for 150 feet on either side,
- if the 300-foot mowed buffer around structures applies to the Industrial Park along 395,
- how often these areas will be mowed and when,
- how invasive species in the mowed areas will be addressed, and
- how mowing will have a positive effect on the Bi-state Sage Grouse.

There are roads that cut through sage grouse use areas: Laurel Ponds, where Sherwin Creek and Mammoth Creek merge, fumarole valley, behind the airport, and east of the Resurgent Dome. The EA needs to be more explicit about which roads will be mowed. There are sage grouse in these areas.

The Connelly (2000) research paper referenced in the EA recommends sagebrush reduction to open up areas where the sagebrush is dense and lacks understory or grasses primarily for nesting habitat. Table 3 in the paper shows the characteristics of sagebrush rangeland needed for productive sage grouse habitat (page 11) and states that the ideal is 25% canopy, but only if there is a 25% cover of grasses and forbs. However, it is important to understand it is focused on the decline of the health of sagebrush in the Greater Sage Grouse habitats in Washington, Idaho, and Colorado rather than the Bi-state Sage Grouse habitat that we have here. The 2012 Bi-state Sage Grouse Action Plan does not list actions to remove sagebrush; let alone 75% of it across the landscape. The fuels reductions in the plan are to eliminate pinyon and juniper trees and to sometimes put in green-strips (i.e., fire breaks) in strategic locations to protect sage grouse habitat. It is a tool, but not the goal. Our members attended two of the meetings in 2023 (South Mono PMU and Bodie Hills/Mt. Grant PMU) to update the action plan. Wholesale sagebrush removal was never mentioned.

To set a prescription to remove 65-75% of the sagebrush in Long Valley is too broad a brush stroke. Even though the Connelly paper recommends no more than 25% sagebrush in sage grouse habitat, it was a study of Greater Sage Grouse that are in greater numbers than the Bi-state Sage Grouse which we have in Long Valley. For the small population of sage grouse with a lot of predators in the area, opening up 65-75% of the sagebrush seems excessive and could be a vector for noxious weeds. A significant amount of work would be needed to prevent cheatgrass moving in instead of native grasses and forbs. As the Connelly paper says, it depends on the type of sagebrush and whether the



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existing habitat is supporting nesting. The EA needs to detail the treatment in sagebrush areas and around sage grouse and not defer that to a phase.

The Connelly paper recommends evaluating the quality of the sagebrush before treatment. This is a good idea. This EA should include an evaluation of the sagebrush in this project's area and then identify where sagebrush needs to be opened up, why, and how. The Connelly paper recommends brush-beating in strips of 13-26 feet if the sagebrush canopy is too dense for good nesting habitat; not mowing. In our smaller sage grouse habitat areas within the project, please consider simply using hand tools to open up areas for nesting.

The quality of the sagebrush on the east side of the Resurgent Dome is excellent. The sagebrush is about 3-4 feet tall, healthy, with forbs in between. It is interspersed with small open areas. It might be improved by opening up a few more areas for nesting here and there, but not a significant reduction. Royal Gold did exploratory drilling in the 1990s and cleared a significant amount of sagebrush for drill pads, temporary roads, and staging areas. The sagebrush has returned and so have the sage grouse. To mow it now would have a negative impact on the sage grouse. The Connelly paper points out, "6) When restoring habitats dominated by mountain big sagebrush, regardless of the techniques used (e.g., fire, herbicides), treat $\leq 20\%$ of the breeding habitat (including areas burned by wildfire) within a 20-year period (Bunting et al. 1987). The 20-year period represents the approximate recovery time for a stand of mountain big sagebrush." It hasn't been that long since the vegetation recovered from the Royal Gold days.

The Connelly paper states that 30% sagebrush canopy should show above the snow in winter. The sage grouse in Long Valley do not migrate and over-winter in Long Valley. They do move around in the area to where sagebrush sticks out above the snow though. Tall sagebrush is an advantage in winters with deep snowpack. Snow depth varies in Long Valley each winter. So, a sagebrush reduction plan needs to take that into account. The sagebrush in the Laurel Ponds is already fairly open. It is not dense there. Because people walk their dogs in the area, the sage grouse will need what sagebrush there is to hide from both the dogs and the people and to nest.

Sagebrush mowing can invite cheatgrass and Russian thistle, which would create a worse fire hazard. 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. Some of the sagebrush will grow back from the roots, some will die. How often will mowing be repeated?

Bi-State Sage Grouse Concerns

We would like to see more in the EA about mitigations related to sage grouse rather than it being addressed in a phase. Human activity that comes with sagebrush and tree removal will also significantly disturb the sage grouse. A 2012 research paper¹ shows noise impacts the Greater Sage

¹https://www.academia.edu/14133188/Recommended_management_strategies_to_limit_anthropogenic_noise_impacts_on_greater_sage_grouse_in_Wyoming or



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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.

The EA implies that since there are only 12 sage grouse in the Laurel Ponds area and one lek, that it is alright if they are impacted. We disagree. Every individual is important and every hen offers an opportunity for the population to grow. 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.

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. The EA should document a baseline depth-to-water level in the Dry Creek basin. The Dry Creek drainage starts at the Mammoth Mountain Main Lodge and ends in the Inyo Craters area. After the fuels reduction is completed in that area, the water table and Big Spring flow could be measured to document the rise in the water table to see if the tree removal does indeed release more water into aquifer. A baseline would also help determine the impact of MMSA's future groundwater use on the Dry Creek water table and on the forest as they expand and revamp the Main Lodge area.

Wood Vaults vs. Burn Piles

Would it be possible to bury the wood, to have wood vaults instead of burning piles?

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 and cultural resources.

Sincerely,

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