



December 12, 2023

Lesley Yen  
Forest Supervisor  
Inyo National Forest  
351 Pacu Lane  
Bishop CA 93514

Dear Supervisor Yen –

For your consideration, please find the public comments of the Mammoth Lakes Trails and Public Access Foundation (MLTPA) regarding the ESCCRP draft Environmental Assessment (EA). Without hesitation, MLTPA supports the ESCCRP project. Unless otherwise stated, MLTPA is also supportive of the proposed action(s) as documented and set forth.

## **MLTPA: At the Intersection of Sustainable Recreation and Wildfire Resilience**

### **Background**

MLTPA creates sustainable trail and recreation systems that support prosperous economies and healthy communities in Mammoth Lakes, the Eastern Sierra, and beyond. To that end, MLTPA has been actively involved in the alignment of state of California and federal policies with the interests of sustainable outdoor recreation.

### **CALREC Vision**

Sponsored and initiated by MLTPA, the CALREC Vision Project works to highlight the essential, multi-benefit role that outdoor recreation plays throughout California. In 2020, MLTPA convened and facilitated federal, state, and regional participants as an advisory committee which met over several months to produce the white paper "CALREC Vision: Cross-Jurisdictional Collaboration to Advance Sustainable Outdoor Recreation in California." **[See Attachment #1]**

In 2021, the California Wildfire and Forest Resilience Task Force was sufficiently inspired by the white paper to task MLTPA with the establishment, convening, and facilitation of a Key Working Group – the “Sustainable & Accessible Recreation Key Working Group” - to produce and deliver Key Actions 3.13 and 3.14 from California’s Wildfire & Forest Resilience Action Plan **[See Attachment #2]**. This effort included a joint strategy to improve access to sustainable outdoor recreation in accordance with action item #7 of the shared stewardship agreement between the U.S. Forest Service and the State of California - "Agreement For Shared Stewardship of California’s Forest and Rangelands" - which was executed in 2020. **[See Attachment #3]**

## **California's Joint Strategy for Sustainable Outdoor Recreation & Wildfire Resilience**

On March 8, 2023, the CA Wildfire & Forest Resilience Task Force published "California's Joint Strategy for Sustainable Outdoor Recreation & Wildfire Resilience." **[See Attachment #4]** The Joint Strategy provides 4 goals and 31 key actions that address the interconnected nature of forest health, wildfire mitigation and recovery, and public access to sustainable outdoor recreation. The key actions are to be implemented by federal, state, regional, and local partners, across jurisdictions and areas of expertise, under the auspices of the California Wildfire and Forest Resilience Task Force. On December 14, 2022, the Sustainable Recreation/CALREC Vision Key Working Group was awarded a Regional Forester's Honor Award for Partnership of the Year from the U.S. Forest Service Pacific Southwest Region in recognition of their efforts developing California's Joint Strategy for Sustainable Outdoor Recreation and Wildfire Resilience.

### **Recommended Enhancements to the Proposed Action Alternatives in the Draft EA**

The Town of Mammoth Lakes, in their letter of comment dated December 6, 2023, including the following paragraph:

- "This project is not only vital from a forest health perspective but is also essential for long term resilience and community protection. The EA adequately addresses these issues along with preparing the landscape for the reintroduction of beneficial fire which will serve as an invaluable management tool into the future. We encourage that the implementation of this work be managed to limit impacts on recreational amenities, and to the extent possible enhance these existing amenities."

MLTPA wholeheartedly supports these comments. Throughout the development of the proposed action in and around Mammoth Lakes, the Town invested resources through the Mammoth Lakes Trail System – a partnered effort with the Inyo National Forest – to ensure that recreation assets, infrastructure, and the experiences of users were documented through the development of geospatial data (GIS). The developed data has subsequently been considered as fuel treatments were identified and developed. MLTPA applauds and supports the Whitebark Institute and the Inyo National Forest for their consideration of sustainable outdoor recreation in the development of this draft EA and the proposed actions.

MLTPA encourages the Inyo National Forest to consider further advancing sustainable recreation values and practices in their final decision by considering the inclusion of goals and key actions from "California's Joint Strategy for Sustainable Outdoor Recreation & Wildfire Resilience," especially as relevant to sections "3.8 Recreation and Scenery (Proposed Action)" and "3.9 Inventoried Roadless Areas." We are confident there will be opportunities to integrate the following into work plans and outreach efforts during project implementation:

#### **Goal # 1**

- **Integrate the provision of high-quality, sustainable outdoor recreation opportunities with forest health and resilience and wildfire and climate mitigation efforts so that all people can connect to the benefits and wonders of the natural world.**

## Key Actions

1. Maintain public access as the climate changes
2. Develop educational materials targeted at reducing the human causes of ignition
3. Develop integrated communications systems
4. Incorporate sustainable outdoor recreation into the state Department of Conservation's Regional Forest Fire Capacity (RFFC) program
5. Add public education to forest health projects
6. Strengthen partnerships between resource conservation districts or other appropriate partners and land managers
7. Implement multi-benefit projects in or adjacent to the wildland urban interface
8. Design and build outdoor recreation infrastructure that is resilient to climate change and wildfire
9. Establish permanent fuel breaks proximate to recreation trails
10. Use data to prioritize wildfire risk reduction treatments in outdoor recreation areas
11. Create wildfire evacuation plans for at-risk outdoor recreation areas
12. Create California Environmental Quality Act (CEQA) / National Environmental Policy Act (NEPA) programmatic exemptions/exclusions for recreation trails located within treatment areas

## Goal #2

- **Plan for and provide a diversity of outdoor recreation opportunities to foster inclusive and equitable access for all Californians.**

## Key Actions

1. Create statewide school programming
2. Create interpretive, historical, and stewardship educational opportunities at key recreation facilities
3. Minimize impact of wildfire-related area and facility closures to public access and recreational use
4. Engage with local communities during post-fire recovery planning to expedite the resumption of outdoor recreation access
5. Explore creating an online outdoor recreation opportunities resource
6. Conduct multi-agency social science survey to gauge the current needs of outdoor recreation users
7. Develop outdoor recreation infrastructure across the state that provides for a diversity of recreation experiences
8. Goal 3: provide health information, training, and alternative recreation opportunities that promote the health and well-being of all peoples, with consideration of people's needs before, during, and after wildfires and other natural disasters.
9. Improve air quality advisory communication
10. Train first responders, community planners, and outdoor recreation staff in mental health first aid and utilize medical reserve corps and similar volunteer groups to provide psychological support during disasters
11. Build partnerships between the health and outdoor recreation sectors
12. Increase opportunities for indoor recreation

### Goal #3

**Provide health information, training, and alternative recreation opportunities that promote the health and well-being of all peoples, with consideration of people's needs before, during, and after wildfires and other natural disasters.**

#### **Key Actions**

1. Improve air quality advisory communication
2. Train first responders, community planners, and outdoor recreation staff in mental health first aid and utilize medical reserve corps and similar volunteer groups to provide psychological support during disasters
3. Build partnerships between the health and outdoor recreation sectors
4. Increase opportunities for indoor recreation

### Goal #4

**Foster and support robust and diversified economies that enhance sustainable outdoor recreation while investing in the resilience necessary to withstand the impact of climate change, wildfires, and other disasters.**

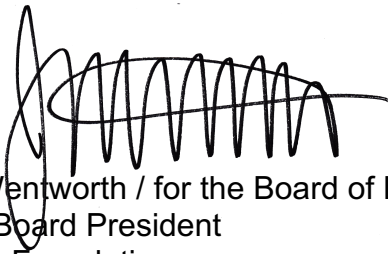
#### **Key Actions**

1. Build sustainable outdoor recreation-based economies
2. Support fundamental community infrastructure
3. Engage communities regarding emergency response and land-management planning
4. Create post-fire educational and marketing materials
5. Provide technical assistance to local businesses
6. Conduct post-fire economic studies
7. Develop post-fire insurance program for the outdoor recreation economy
8. Evaluate existing telecommunications infrastructure and perform upgrades

Treatments of forest fuels as proposed in the "Draft Environmental Assessment for the Eastern Sierra Climate and Communities Resilience Project" are critical for the safety, sustainability, and resilience of the community of Mammoth Lakes and residents and visitors of the Eastern Sierra.

Many thanks for consideration of our comments.

Best –



John Wentworth / for the Board of Directors  
CEO / Board President  
MLTPA Foundation