

Re:- Burnt Rock Draft Environmental Assessment

June 5, 2026

Dear Mr./Ms. Levesque:

I would like to register objection to the proposed Bodie Hills Burnt Rock exploratory drilling project. I make frequent recreational trips to the Bodie Hills. Thus far in 2026 I have camped and bird watched on the Masonic Road (awesome cushion plants!) and driven part way into Bodie. I hope to return 2-5 more times to the Eastern Sierra and Mono County this year.

I visited the general area of the project site in 2022. Although my time in the area was brief, I was awed by the good condition of the pinyon pine forest. There were several neotropical migrants observed by me including Western Tanager. See: <https://ebird.org/checklist/S118255105>.

Below, you will find photos taken near the Aurora townsite and the Aurora Cemetery. Although not exactly at the project site, the photos depict the high quality pinyon pine forest present in this area.

An EA is insufficient to address the multiple significant impacts involved in this project. I request that a full Environmental Impact Statement (EIS) be prepared. Bi-state sage grouse, mule deer, and pronghorn will be affected by habitat loss, vibration and noise generated by tree removal, earthmoving equipment, and drilling and from human disturbance during pad preparation and drilling. The project site contains a healthy population of Bodie Hills cusickiella as well as Long Valley milkvetch — both of which represent US Forest Service sensitive species.

Hundreds of healthy pinyon pines will be removed. A 20 foot wide arterial road will be constructed through sage grouse habitat. I have viewed photos documenting substantial invasion of weedy plant species invading nearby Bodie Hills drill pads and new roads despite so-called mitigations involving herbicide and reseeded. The mitigations proposed to prevent invasive plant species are not adequate. They should also include having a biological monitor examine all incoming equipment for mud and vegetation in the wheels and undercarriage. This is a common best management practice for work in endangered species habitats in coastal California. All vehicles must be freshly washed. Additionally, there should be six years of post-project vegetation management crews surveying the area and weed whacking or removing by hand all invasive species along new roadsides and new drill pads.

Groundwater pumping (proposed for seven years or more) from private land near the project site will impact a freshwater spring. There were no surveys of this spring and wetlands as far as I can tell. Many isolated aquatic resources in the Great Basin harbor endemic mollusks such as spring snails or “Pyrgs”. Today I downloaded the Nevada Division of Natural Heritage sensitive species list (available at: https://heritage.nv.gov/assets/documents/2024-02-Track_List.pdf). I did not do a thorough search, and thus utilized a list dated 2024. Likely there are more up-to-date lists

available. The 2024 list had 60-70 species of Pyrgs. Most of these are found in very few locales. There may well be a unique species in the Burnt Rock area that, if found and described, would likely be eligible for listing as endangered or threatened. The EA is incomplete as it does not address seven years of dewatering of a small isolated wetland that could result in a significant impact to a sensitive species.

If approved, permits for this project should be conditioned with requirements of full-time on-site monitors to ensure minimization of damage to resources, including a biological monitor to avoid and minimize impacts to sage grouse, pronghorn, nesting birds, and other sensitive sources including rare plants or wetlands, which would include vehicle inspection to limit introduction of invasive plant species.

The draft EA should NOT result in a Finding of No Significant Impact. If the USDA Forest Service continues to pursue permitting this project, an EIS must be prepared. To repeat: An EA is insufficient to address the multiple significant impacts involved in this project. I request that a full Environmental Impact Statement (EIS) be prepared. In summary, I and many other humans and wildlife species rely on rugged pinyon-juniper woodlands--on public lands-- for recreation and solitude.

Thank you in advance for consideration of my comments.

Sincerely,

Emilie Strauss

San Francisco Bay area, California



