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Comments: Please find attached the comment letter from the Mono County Community Development Department.

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Submitted via website at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61827>

RE: Eastern Sierra Climate and Communities Resilience Project Draft Environmental Assessment Comments

The Mono County Community Development Department appreciates the opportunity to review and comment on the Environmental Assessment for the proposed Eastern Sierra Climate and Communities Resilience Project. We understand the project entails fuel treatments on approximately 58,000 acres of Inyo National Forests generally surrounding Mammoth Lakes, including significant acreage in unincorporated Mono County. Fuel treatments include ecological thinning, fuels reduction, and restoration using hand, mechanical, and aerial methods, for the purpose of improving forest health, resistance, and resilience.

Since the project's unincorporated territory is federal land within the Inyo National Forest (INF), no timber harvest plan or other County planning permits are anticipated. The Community Development Department's primary concerns are related to air quality and noise. The separate study on air quality and compliance with particulate matter standards are appreciated. The temporary nature of noise impacts is understood, and the buffers from private property and structures are appreciated.

The proposed project is consistent with the Mono County General Plan, particularly the Safety Element, which

incorporates the Multi Jurisdiction Hazard Mitigation Plan and Community Wildfire Protection Plan. Specific policies and actions supporting the project include the following:

SAFETY ELEMENT

GOAL 3. Avoid exposure of people and improvements to unreasonable risks of damage or injury from fire hazards.

Objective 3.A.

Plan for and regulate development in a manner that protects people and property by minimizing risks from wildland and structural fire hazards.

Policy 3.A.1. Continue to plan for wildfire protection in Mono County.

Policy 3.A.7. Reduce fuel around developed areas throughout the county to minimize wildland fire hazard risks to people and property.

Action 3.A.7.a. Review the County's land use designation maps to ensure that land uses near high or very-high-hazard fire severity zones are compatible with wildland fire protection and suppression activities.

Planning / Building / Code Compliance / Environmental / Collaborative Planning Team (CPT)
Local Agency Formation Commission (LAFCO) / Local Transportation Commission (LTC) / Regional Planning Advisory Committees (RPACs)

Action 3.A.7.b. Consider amending the CWPP to establish wildfire defense zones around community areas (e.g., fuel breaks, shelter zones, backfire areas, and staging areas to support fire-suppression activities).

Action 3.A.7.c. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

Action 3.A.7.d. Coordinate with Public Works, Cal Fire, U.S. Forest Service, local Fire Protection Districts, local Fire Safe Councils, and private property owners to maintain fuel breaks and appropriate flammable vegetation clearance along public and private roads.

Action 3.A.7.e. Support fuel management programs and plans, consistent with state law, that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation, wildlife, and sensitive habitats.

Action 3.A.7.f. Support appropriate fuel management projects to remove hazardous fuel loads and improve ecosystem health.

Additional supporting policies are contained in the Mono County General Plan Conservation Open Space Element, including the following:

CONSERVATION/OPEN SPACE ELEMENT

Objective 1.B.

Improve the health, resilience, and carbon sequestration capacity of the natural and agricultural landscape.

Policy 1.B.1. Maintain and manage open space to protect from fire and erosion.

Policy 1.B.2. Encourage other programs that protect natural areas.

Action 1.B.2.a. Promote biomass heat/energy utilization projects meeting environmental standards as a means to incentivize fuel reduction projects for healthy forests by creating an economic market for woody biomass.

Objective 6.B.

Ensure a healthy forest resource.

Policy 6.B.1. Work with Cal Fire and federal land management agencies to minimize the impacts of new development on forest resources.

Policy 6.B.2. Encourage fuel reduction and other management treatments to improve forest health, such as reduced catastrophic fire potential, invasive species management, and reduced disease and insect outbreaks.

Action 6.B.2.a. Support the development of a market to utilize biomass from these types of forest health projects.

Again, thank you for the opportunity to comment. Please let us know if you have questions regarding Mono County General Plan policy or permitting requirements.

Sincerely,

Wendy Sugimura
Director

CC: County Administrative Officer
Mono County Emergency Management