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<https://cara.ecosystem-management.org/Public//CommentInput?Project=59294>

Colleen Garcia

Inyo National Forest

351 Pacu Ln, Suite 200

Bishop, CA 93514

Re: Long Valley Exploration Drilling Project #59294

Dear Ms. Colleen Garcia,

I am writing to express my comments and concerns regarding the Long Valley Exploration Drilling Project #59294.

I have reviewed the Public Scoping Letter and Draft Exploration Plan of Operations (hereafter, "Draft") for the KORE Long Valley Project and respectfully disagree that this project fits the requirements for a categorical exclusion. I think there are extraordinary circumstances that call for an Environmental Assessment so both the Inyo National Forest (INF) and the public can have an opportunity to consider potential long-lasting impacts to these important shared resources.

The sagebrush ecosystem near the Long Valley Exploration Drilling Project #59294 supports many plants and animals. I am concerned about potential impacts to rare plant species that have been observed in the immediate vicinity including *Astragalus johannis-howellii*, *Astragalus lemmonii*, *Astragalus monoensis*, *Atriplex pusilla*, *Boechera cobrensis*, and *Crepis runcinata*. I understand biological surveys will be completed prior to implementation. However, given the extraordinarily dry conditions, how can you be sure these species will even show up this year? I would like to insist that measures be taken to protect these species if individuals are found within the project site.

Long Valley supports the subpopulation of the Bi-State Distinct Population of the greater sage-grouse, which represents nearly 25% of the total population. Numbers of the Long Valley subpopulation, along with the sagebrush habitat which they depend on, are both declining. I understand that under the Forest Management Plan, the INF is required to conduct biennial monitoring of this important sagebrush ecosystem. I believe the information provided in this monitoring report will help both the INF and the public better understand the impacts the Project will have on this sagebrush ecosystem that is already experiencing impacts from drought, grazing, cheatgrass invasion, and wildfire. Therefore, it seems prudent for the INF to wait until this report is completed so it can be incorporated into an Environmental Assessment.

Additional concerns that I would like to see addressed in an Environmental Assessment include the following:

*Cheatgrass: Several locations near the Project area, especially near Hot Creek, that been converted to nearly 100% cheatgrass cover. Disturbance from the Project could potentially lead to additional conversion from sagebrush to cheatgrass.

*Wildfire: The increased chances of accidental wildfire ignition due to exceptionally dry conditions, along with the

high fuel loads resulting from long absence of fire, make wildfire a looming threat to this area. The possibility for accidental ignition from activities outlined in the Draft, such as mowing or drilling, need to be analyzed and appropriate mitigation measures enforced.

*Disturbances to sage-grouse: Noise induced impacts to sage-grouse range from reduced breeding success to death of individual birds (Patricelli et al. 2012). Potential impacts of drilling noise to the Long Valley subpopulation need to be assessed and mitigation measures should be put in place.

*Grazing: The Draft states KORE has contacted the holder of the active grazing lease and they are aware of their proposed activities. However, I am concerned that the degradation of vegetation in the Project area means fewer resources will be needed to be shared among both the cattle and the other wildlife in the area. Already, the cattle have heavily grazed the bitterbrush in the area due to lack of other food sources.

Thank you for consideration of these comments. Please keep me informed of any developments regarding the Long Valley Exploration Drilling Project #59294.

Sincerely,

Katie Quinlan