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Colleen Garcia

Inyo National Forest

351 Pacu Ln, Suite 200

Bishop, CA 93514

Re: Long Valley Exploration Drilling Project #59294

Dear Ms. Colleen Garcia,

We, the California Native Plant Society (CNPS) Bristlecone Chapter, are writing to express our comments and concerns regarding the Long Valley Exploration Drilling Project #59294.

The California Native Plant Society is a non-profit organization working to protect California's native plant heritage and preserve it for future generations. Our nearly 10,000 members are professionals and volunteers who work to promote native plant conservation through 33 chapters statewide. Our local CNPS Bristlecone Chapter has members from Inyo and Mono counties, as well as throughout California and from countries across the globe. The attraction to these thousands of members is the vast and beautiful landscapes - montane and desert - where uniquely intriguing, diverse, and sensitive vegetation occur.

We 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. We believe 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 (hereafter, "Project") supports many plants and animals, especially the Long Valley subpopulation of the Bi-State Distinct Population Segment of the greater sage-grouse (Bi-State DPS) which represents nearly 25% of the total population (Coates et al. 2020). Our membership is aware that numbers of the Long Valley subpopulation, along with the sagebrush habitat which they depend on, are both declining. We understand that under the Forest Management Plan, the INF is required to conduct biennial monitoring of this important sagebrush ecosystem. We 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, and cheatgrass invasion. Therefore, we deem it prudent for the INF to wait until this report is completed so all stakeholders will have the best available data to assess potential impacts from the Project.

Our chapter is 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*. We acknowledge that the public scoping letter states the biological surveys will be completed prior to implementation. However, given the extraordinarily dry conditions, we suggest that the surveyor(s) visit reference locations to ensure these species have emerged and will be identifiable.

Additionally, we would like to see what measures will be taken to protect these species if individuals are found within the project site.

Additional concerns that we 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. We suggest that the possibility for accidental ignition from activities outlined in the Draft, such as mowing or drilling, 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 should 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, we are concerned that the degradation of vegetation in the Project area will mean fewer resources will be available to be shared amongst the cattle and the other wildlife in the area. Our members have observed that 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 us informed of any developments regarding the Long Valley Exploration Drilling Project #59294.

Sincerely,

Maria Jesus
CNPS Bristlecone Chapter, Conservation Chair

References

Coates, P.S., Ricca, M.A., Prochazka, B.G., O'Neil, S.T., Severson, J.P., Mathews, S.R., Espinosa, S., Gardner, S., Lisius, S., and Delehanty, D.J., 2020, Population and habitat analyses for greater sage-grouse (*Centrocercus urophasianus*) in the bi-state distinct population segment-2018 update: U.S. Geological Survey Open-File Report 2019-1149, 122 p., <https://doi.org/10.3133/ofr20191149>.

Patricelli, G.L., Blickley, J.L., and Hooper, S.L. 2012. The impacts of noise on greater sage-grouse: A discussion of current management strategies in Wyoming with recommendations for further research and interim protections.

https://eplanning.blm.gov/public_projects/lup/36511/45862/49563/WildEarth%20Guardians/Attachment%2013%20Patricelli,%20et%20al.,__%20Revised%20noise%20recommendations,%202012.pdf