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First name: Bartshe

Last name: Miller

Organization: Mono Lake Committee

Title: Eastern Sierra Policy Director

Comments: May 12, 2021

Ms. Colleen Garcia

Inyo National Forest

Minerals Program Manager

351 Pacu Lane, Suite 200

Bishop, CA 93514

Submitted via project website comment form

Dear Ms. Garcia,

The Mono Lake Committee is writing on behalf of our 16,000 members to comment on Kore USA Ltd.'s proposed Long Valley Exploration Drilling Project. This project proposal is south of the Mono Basin, which is our area of focus, but Long Valley is well-connected via water resources along the Los Angeles Aqueduct, Bi-State Sage Grouse, and migratory birds. The Mono Lake Committee opposes a Categorical Exclusion and requests that the Inyo National Forest consider a higher level of NEPA review due to the lack of information and extraordinary circumstances that warrant further analysis.

The Mono Lake Committee is a non-profit citizens' group dedicated to protecting and restoring the Mono Basin ecosystem, educating the public about Mono Lake and the impacts on the environment of excessive water use, and promoting cooperative solutions that protect Mono Lake and meet real water needs without transferring environmental problems to other areas.

The Bi-State Sage Grouse is a proposed threatened species under the Endangered Species Act and a USFS-designated sensitive species. The species is documented in the project proposal area. Negative impacts to the species and habitat are possible and must be further analyzed. The proposed project area is located within three miles of several known leks. Mineral exploration outside the lekking season is not sufficient to reduce impacts to this species since hens often nest well within three miles of lek areas, and birds are possible in the area year-round. With approximately 3,300 of these birds remaining in the Bi-State population, including a portion of them in the Mono Basin, the species is already under extreme pressure due to human impacts and habitat fragmentation. The status of this species, and its range within the project area, represents extraordinary circumstances. The preparation of an Environmental Assessment or Environmental Impact Statement is supported.

Tribal consultation has not occurred, and before a proposed action can be determined to meet the Inyo National Forest land management plan and other regulations, thorough Tribal consultation must take place to determine if significant impacts will occur. Tribal consultation will help the Inyo make an informed decision and help determine if extraordinary circumstances exist. Currently the absence of Tribal consultation indicates a lack of information in the project.

The Long Valley Exploration Drilling Project lies at the epicenter of the Inyo National Forest's Eastern Sierra scenic, recreational, ecological, cultural, and watershed resources. The potential impacts of the proposed mineral exploration, in addition to future projects attached to it, are extraordinary in scope and eclipse a simple Categorical Exclusion. The Mono Lake Committee requests that the Inyo prepare an Environmental Assessment or Environmental Impact Statement to provide more complete analysis.

Thank you for the opportunity to comment and your consideration of the Mono Lake Committee's comments. If you have questions regarding the Committee's comments or require further information, please contact Bartshe Miller at 760.647.6595 ext 121 or bartshe@monolake.org.

Sincerely,
Bartshe Miller
Eastern Sierra Policy Director, Mono Lake Committee