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First name: John

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Organization: MLTPA

Title: CEO / Board President

Comments: Fred Wong

Mammoth District Ranger

P.O. Box 148

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RE: Proposed Action for the Eastern Sierra Climate and Communities Resilience Project (ESCCRP)

Dear Fred -

The Mammoth Lakes Trails and Public Access Foundation (MLTPA) wholeheartedly and enthusiastically supports the proposed actions for the "Eastern Sierra Climate and Communities Resilience Project (ESCCRP)." The project appears to be consistent with the goals, objectives, and desired conditions of the Inyo NF's recently adopted Land Management Plan (LMP) which identified wildfire and sustainable recreation as two of three primary areas of focus. MLTPA convened, facilitated, and funded the "Eastern Sierra Recreation Collaborative (ESRC)" - <https://mltpa.org/essrp/esrc-public-meeting-information-2016> - which generated over 20 pages of "citizen suggested desired conditions" for the Inyo NF's LMP process. On behalf of the citizen stakeholders, we were thrilled to see many of their suggestions included in the final LMP and we are further encouraged to see a project like the ESCCRP come forward which appears to fully embrace the spirit along with the regulations and policies that have been formalized in the LMP.

We specifically support the following three areas of focus that have been quoted from the Proposed Action as they support the ESCCRP's efforts to "... to reduce the potential of uncharacteristic wildfire and improve forest health, resistance, and resilience around the Town of Mammoth Lakes (TOML), the economic and recreation hub of Mono County." We would further argue that Mammoth Mountain Ski Area + Resorts constitute the economic hub of the entire Eastern Sierra Region.

1)"This Proposed Action builds off the public collaboration driven by local non-governmental organizations to understand concerns of tribes, local stakeholders, and community members. The ESCCRP will continue to be evaluated and implemented in a collaborative manner to ensure local priorities and concerns are incorporated into the Project."

2)"...forested ecosystems that are central to recreation, which is critical to the economy of the Eastern Sierra, are irreplaceable and at imminent risk. Without actions to reduce fuel loading around the TOML and improve the ability of firefighters to safely and effectively respond to a fire, catastrophic wildfire could occur and result in widespread community damage, loss of life, extensive economic impacts, and the loss of highly valued ecosystem services."

3) "5. Design Criteria - Recreation (REC)

"REC-01 Previously undocumented use trails encountered during Project surveys, monitoring, or implementation will be recorded and classified using USFS Trail Class Matrix prior to or during implementation. Spatial data will be collected using a device with a position accuracy of 5 meters or less, using NAD 1983, UTM Zone 11. Additional information collected may be incorporated into the prioritization framework for the ESCCRP for the life of the Project.

"REC-02 Previously undocumented dispersed camping areas encountered during Project surveys, monitoring, or

implementation will be recorded prior to or during implementation. Spatial data will be collected using a device with a position accuracy of 5 meters or less, using NAD 1983, UTM Zone 11. Additional information collected may be incorporated to the prioritization framework for the ESCCRP for the life of the Project.

"REC-03 Specifications for treatments adjacent to recreation infrastructure will be evaluated to account for the function of trees within the extent of the infrastructure (e.g., healthy trees that are providing shade or privacy at picnic areas/campsites, may be left standing to sustain the function and enjoyability of the use area).

"REC-04 Within reason, scheduling of fuels reduction treatments and pile burning will be coordinated with USFS permittees (e.g., recreation residences, resorts, marinas, campgrounds, and other businesses or facilities), with the Project timeline and scale being prioritized while considering potential impacts to recreation and tourism.; t Treatments within and/or directly adjacent to campgrounds will be scheduled to avoid the campgrounds operating seasons to the greatest extent possible. In some instances, campgrounds will be closed temporarily to provide for efficient and cost-effective removal of trees while ensuring safety of the visiting public.

"REC-05 USFS permittees and recreation Project partners and affiliates will be notified when fuels reduction work will be implemented around developments (e.g., recreation residences, resorts, marinas, campgrounds, and other businesses or facilities) located on National Forest System Lands.

"REC-06 Impacts to recreation sites/infrastructure and previously classified trails (trails classified prior to pre-implementation trail surveys) will be minimized during implementation; any infrastructure or system trails and trails under special-use permits that are negatively impacted by treatment efforts will be repaired to previous conditions following implementation. Logs encountered laying across established/classified trail systems during treatment implementation will be bucked and relocated away from the trail.

"REC-07 Photo Documentation: Pre-treatment photos will be taken to document the conditions of established trails and recreation infrastructure prior to implementation. Post-treatment and post-restoration photos will be taken following treatment and reparation efforts.

"REC-08 Short-term closure of recreation sites, roads, trails, or detours may be necessary during Project implementation; closure duration will be minimized to the greatest extent possible.

"REC-09 When winter operations are necessary, consideration of high visitation to the Mammoth Area will play into implementation operations planning to minimize negative impacts to the visiting public.

"REC-10 For roadside sagebrush mowing, an eyebrow of brush must be left along the roadside to deter off-road vehicle use."

About MLTPA, the Mammoth Lakes Trails and Public Access Foundation

MLTPA was established in 2006 in response to public access and trail-based recreation opportunities in Mammoth Lakes, California and now operates with a mission to create sustainable recreation systems that support prosperous economies and healthy communities in Mammoth Lakes, the Eastern Sierra, and beyond. In developing the Mammoth Lakes Trail System, MLTPA initiated and delivered a new Trail System Master Plan for the Town and secured financing for its implementation by managing the successful passage of Measure R, a dedicated revenue stream for the benefit of trails, recreation, and parks. MLTPA has been awarded grants from the National Forest Foundation in support of the Eastern Sierra Recreation Collaborative, the Sierra Nevada Conservancy and Proposition 68 for the Sustainable Recreation and Tourism Initiative, and the Innovative Finance for National Forests Program, the U.S. Endowment for Forestry and Communities, and the National Forest Foundation to address recreation needs on the Inyo National Forest. MLTPA is currently delivering "California's Joint Strategy for Sustainable Outdoor Recreation and Wildfire Resilience" to California Wildfire

& Forest Resilience Task Force in fulfillment of deliverables from their Action Plan.

Many thanks for consideration of our comments, we look forward to actively tracking the ESCCRP and to playing a constructive role in its implementation once the requisite NEPA decisions have been made.

Best -

john

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