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Comments: To: Project Manager Erin Levesque
Burnt Rock Exploration #294257
From: Grace Anderson
South Bodie Hills Drive, Mono Basin North Shore (secondary residence)

Thank You for this opportunity to comment on the Burnt Rock Exploratory drilling project. I am entirely impressed by your website and this electronic approach you have offered to commenters. I also know how the USFS staff has been beleaguered in recent years by staffing limitations, transfers, project proposals and general discouragement. There are so many of us that support you silently and with communication to our elected officials/in-person protests. Protection and conservation of our public lands is always a top tier policy priority for me and my acquaintances.

There is much to say about the Bodie Hills, a unique and rare gem in the California/Nevada boundary geography. They are among the many reasons I became a landowner in the Mono Basin, in 1988, west of the proposed drilling project, in the Cottonwood Canyon neighborhood. The Hills have important historical significance and biological diversity. Just because they are "empty" does not mean that it is acceptable to widen roads build roads scrape drill pads and generally cause impact to wild lands and wild creatures.

One of many key points to consider is the assertion in the project description that the drilling will be limited to 250 acre disturbance. That seems implausible given the extent of the project. While the pads and the actual roadways may total only this acreage of disturbance, the area that is disrupted by linear infrastructure and associated activities will be significantly greater.

This is particularly concerning if one were to take an holistic perspective (this EA does not) and look at the full gamut of multiple drilling projects being proposed in The Hills. Thus one key question and objection is: why do we not have a cumulative EIS process for Burnt Rock and the many other drilling projects in proposal stage? While no doubt you are doing the legal (minimal) review, in truth for the conservation of a wild place, a cumulative approach is the ethical and accurate method to gauge impacts. Please call a moratorium on projects such as Burnt Rock until the full complement of drilling proposals are identified so that impacts to The Hills can be assessed in a comprehensive, meaningful inclusive method.

A second concern of major interest to local landowners is traffic on Highway 267. A project of this magnitude will surely cause huge incremental in movement of large construction vehicles from both east and west directions. We choose to inhabit the North Shore of Mono exactly because there isn't large commercial vehicle traffic. Numbers, weight, noise mitigation and frequency of traffic through a detailed study need be quantified. Please require this quantification and mitigate all impacts.

A third quality of life in the Mono Basin is its rare elusive dark night skies. If the project were to use scatter lighting of unprotected fixtures, the escaped light could be visible for long distances even across the entire Basin. Please do not allow this! Any project lighting need be sheltered from view and meet all standards for downward night lighting identified by Dark Skies western advocates.

A fourth concern is the addition of new dirt roads and widening of existing roads. It is inevitable that this occurrence will measurably increase road and off-road vehicle use with attendant impacts. Among these are dust plumes that will mix with alkali plumes that carry harmful pollutants to local residents. Project (actual) and future post-project use of existing and new roads must be quantified. Please require permanent all-season

impact mitigation be mandated.

Another of the many reasons local landowners choose to be on North Shore is the vibrancy of the birding environment in the Mono Basin. Among the most critical of the nesting birds are the presence of the bi-state Greater Sage Grouse. While we avoid any disturbance of these majestic mysterious creatures, it is profoundly reassuring to us that they inhabit hills near us. The decline of the grouse and its pivotal role in the debate over development of the western states is well known and need not be repeated here. Suffice to say, huge effort has been invested in understanding how to move forward.

Humans known for hubris more than humility, can't credibly assess how the impact of any one (or multiples of) project such as Burnt Rock #294257 will impact the local native or overall western population. Simply stated, there is no "safe" degree of disturbance of their ecological niche, breeding grounds, individual leks or food sources. No projects should be permitted in these areas and any industrial activities in the general region must follow basic rule of non-op in the March1-June 1 annual nesting season cycle. Any disturbance of land surface in Sage grouse habitat should be limited to less than 100 acres. Please require this.

Of lesser importance than critically endangered species are weeds. Most parcels in areas of South Bodie hills are minimum 20 acre zoning. My property remains largely of native vegetation including the majestic native grasses, sage, Desert peach and other shrubs. The exception to this is where I have disturbed the landscape with a roadway and small building pad. These zones are fraught with invasive plants shrubs and grasses that are seemingly impossible for an individual landowner to eradicate.

Project #294257 can have destructive impact well beyond its asserted "limited" area. Weeds are not tied to any geography. Project weed species will become North Shore invasives. It is thus essential that all non-native vegetation be managed in the project areas. This would entail both common and uncommon species and must include Russian thistle, cheat grass, Halogeton and others. To accomplish this it will require not only one round of mitigation but seasonal, recurrent effort by project owners. Please require this.

A final , and perhaps most important point, is that any drilling project is simply a "Nose under the Tent". Conducting an EA on drilling is a laudable (and legally required) first step in the procession of development. What really matters? What is in the tent? Isn't the whole goal of exploratory drilling to eventually land the grand ballroom dance of hugely destructive, full-scale mining.

Should drilling prove of economic interest, The Hills could be "home" to multiple full scale mines. Why is this not being assessed? While not legally mandated, a truly useful and relevant document would be a White Paper that takes a "What If?" approach. For example, what if three drilling projects yield compelling results and mines are then pursued. What impacts would result? What county costs would emerge? Is there any "carrying capacity" for mining activity in The Hills? What recurrent mitigation would be required to resolve all pre and post mining activity? Who benefits from this invasive activity? Such a White Paper could allow for most thoughtful consideration of future direction and alternatives that can contribute to sustainability and vitality of this treasured habitat.

Thank you for consideration of these comments and best wishes for a positive work environment.

Grace Anderson