

Data Submitted (UTC 11): 10/20/2023 1:33:49 PM

First name: Bartshe

Last name: Miller

Organization: Mono Lake Committee

Title:

Comments: The Mono Lake Committee (MLC) provides these comments on the Inyo National Forest's Over-Snow Vehicle Use Designation Process Proposed Action (Project).

MLC has reviewed the Project and the interactive map and scoping documents with emphasis on Map 1 Proposed Action focused on the Mono Basin.

MLC is a non-profit citizen's 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. Supported by 16,000 members, the MLC has been active in the Mono Basin since 1978.

Mono Basin National Forest Scenic Area

MLC recognizes that both over-snow vehicle use and non-motorized recreation are important forms of recreation on the Inyo National Forest and that the Mono Basin National Forest Scenic Area Management Plan continues to provide important and helpful guidance in this Project scoping and analysis. The Committee's comments are focused on the Project area surrounding Mono Lake. The consideration of minimum snow depth and compaction requirements are an important metric for balancing the potential impacts to soils, vegetation, wildlife, springs, water quality, and cultural resources around Mono Lake and within the Scenic Area. MLC supports the designation of OSV trails on existing roads around Mono Lake as shown in Map 1.

Monitoring and adaptive management

While OSV use has not been high in the Mono Basin relative to more consistently snow-covered areas to the south, MLC stresses the importance of monitoring and future adaptive management solutions. If climate change brings variable or unpredictable changes in snow cover and shifting recreational use, there could be impacts to soil, vegetation, wildlife, cultural resources, and scenic values.

Parker Meadows, west of Highway 158 may require additional monitoring focus given the effort to repatriate Bi-State Sage Grouse and the vulnerability of these birds in this region. OSV use does not typically occur when Sage Grouse are on the lek; however, increasing warming and precipitation extremes may accelerate or delay lek habitat availability. Sage Grouse begin to congregate in the lekking area in early spring and this congregation does not necessarily synchronize with decreasing snow depth and OSV use. The unusually late, low-elevation snowpack in spring 2023 is a perfect example.

Thank you for the opportunity to comment on the Inyo National Forest's Over-Snow Vehicle Use Proposed Action. Please contact me at (760) 647-6595 ext. 121 or bartshe@monolake.org if you have any questions or would like to discuss further.

Sincerely,

Bartshé Miller

Eastern Sierra Policy Director