



MAMMOTH LAKES FIRE PROTECTION DISTRICT

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December 18th, 2023

RE: Mammoth Lakes Fire Protection District Public Comment on the Eastern Sierra Climate and Communities Resilience Project

Dear Inyo National Forest Supervisor Yen,

On behalf of the Mammoth Lakes Fire Protection Board of Commissioners, the Fire District submits the following comments for consideration. The Fire District is in full support of the ESCCRP project as prepared in the November 2023 Environmental Assessment. The project is vital for both public safety as well as economic resilience of the region. The Fire District is in consensus on the purpose and need, with strong support for improving community wildfire resilience and preparing the landscape for the reintroduction of beneficial fire.

The project represents an assessment and understanding of the size and scope of the challenge before us. The current landscape is the direct result of decades of direct and indirect human impacts. In the coming years, the impact will amplify as long-term climate changes impact short term weather events. This current year, the region was impacted by an “outlier” winter storm emergency that resulted in a FEMA declared disaster. Unfortunately, these “outliers” are becoming more frequent and the need for adapting to climate change is evident. The forest cannot recover to a healthy long-term balance without deliberate actions to reduce current stand density and remove dead fuel loading. The proposed action of approximately 58,000 acres represents an effort that has utilized current scientific understanding and has conducted significant outreach to stakeholders and constituents. With the foreseeable challenges ahead of us, the project represents the forest and community’s best path forward towards resiliency and health.

The Fire District believes that the project has been thoroughly vetted and has considered all alternatives to arrive at the best course of action. Reducing the scale of the project would mean to surrender the health of a significant portion of the forest. Similarly, lack of treatment in inventoried roadless areas would be a failure to understand current threats and scientific best practices. Explanatory material accompanying the 2001 Rule described the areas having *roadless area characteristics*. These include sources of public drinking water, diversity of plant and animal communities, natural appearing landscapes with high scenic quality, and traditional cultural properties and sacred sites. These characteristics make a compelling argument for why the IRAs must be included in the project. The current tree mortality, especially in parts of the Sherwin Range and the Lakes Basin is even higher than captured by the assessment because the mortality is occurring at such a fast rate. The Inyo Craters area serves as a looking glass into how the forest will change without timely and decisive action. Most importantly, due to the nature of wildfire and the local weather and topography, no project attempting

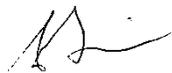
to create community wildfire resistance can have success without a treatment plan that moves beyond artificial boundaries and meets the forest where it stands.

The Mammoth Lakes Fire Protection District understands the challenges that the United States Forest Service (USFS) faces in moving projects such as the ESCCRP forward. In recognition of the needs of the region, the Fire District is not just asking for USFS action but has attempted to serve as a good partner in collaboration. This includes local operational projects that mitigate risks within the community and provision of support for USFS projects that immediately impact the area. The Fire District intends to continue and strengthen these shared responsibilities as the project moves forward.

The Mammoth Lakes Fire Protection District is in full support and appreciation of the Eastern Sierra Climate & Communities Resilience Project as proposed and presented.

Thank you and please reach out if the Fire District can provide any further information or clarify support, at atomaier@mlfd.ca.gov .

Respectfully,

A handwritten signature in black ink, appearing to read 'Ales Tomaier', with a stylized flourish at the end.

Ales Tomaier
Fire Chief
On Behalf of the Board of Fire Commissioners
Mammoth Lakes Fire Protection District

CC: MLFPD District Board