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Comments:

Phillip L. Kiddoo

Air Pollution Control Officer

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Fred Wong

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Inyo National Forest

2510 Main St., Mammoth Lakes, CA 93546

Subject: Eastern Sierra Climate and Communities Resilience Project Draft Environmental Assessment

Comments

Inyo National Forest and whom it may concern,

The Great Basin Unified Air Pollution Control District (GBUAPCD or District) has reviewed the Draft Environmental Assessment for the Eastern Sierra Climate and Communities Resilience Project (Project). GBUAPCD's comments are attached below. GBUAPCD supports the project goals of forest health and community wildfire protection. The air quality impacts of the proposed project may be less than the air quality impacts of taking no action in the event there was a large scale uncontrolled wildfire. GBUAPCD staff are available to provide additional information on air quality, the regulatory role of the District, and prescribed burning. To contact us, please reach out to me or Tom Schaniel, Air Quality Specialist, at 760-872-8211 or at permits@gbuapcd.org.

Sincerely,

Ann Logan

Deputy Air Pollution Control Officer

For Phillip L. Kiddoo- Air Pollution Control Officer

GBUAPCD Comments on the ESCCRP Draft EA

Section 3.6.1 Air Quality and Climate Change - Affected Environment

- * It would be beneficial to provide additional information regarding air districts including:
 - o Provide the full names of San Joaquin Valley Air Pollution Control District (SJVAPCD) and Great Basin Unified Air Pollution Control District (GBUAPCD). GBUAPCD covers Inyo, Mono and Alpine counties.
 - o In additional sections there is inconsistency/errors in the GBUAPCD acronym
- * It would be helpful to introduce and define airborne particulate matter (PM) including PM10 (particulate matter of size less than or equal to 10 microns), PM2.5 (particulate matter of size less than or equal to 2.5 microns), as well as greenhouse gases (GHG) when first using the acronyms in the text.
- * This section does not correctly reflect the state and federal air quality designations.
 - o For federal air quality standards, Mono County has two areas with PM10 designations.
 - ? The Mammoth Lakes PM10 Planning Area is attainment for PM10 NAAQS. The Mammoth Lakes P10 Second 10-Year Maintenance Plan is the current SIP plan for the area and includes information on general conformity. The Mammoth Lakes PM10 Planning Areas and the ESCCRP Project area overlap significantly.
 - ? The Mono Basin PM10 Planning Area is nonattainment for PM10 NAAQS. Any overlap with the ESCCRP Project area and the Mono Basin PM10 Planning Areas appears to be minimal or not at all. The District is happy to provide GIS shapefiles of all NAAQS designated areas.
 - ? The remainder of Mono County is currently unclassified for the NAAQS.
 - ? The majority of the ESCCRP project is in either unclassified or attainment for PM10 NAAQS.
 - o For state standards the Great Basin Valleys, including Mono County is nonattainment for PM10 and ozone CAAQS.
 - o Current state and federal air quality designations may be found at <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.
 - o Detailed maps and information on the federal designations, including the State Implementation Plans and Maintenance Plans may be found at <https://gbuapcd.org/District/AirQualityPlans/>.
 - o This air quality designation information should also be updated in other sections and attachments.
- * In addition to the discussion sensitive areas, we recommend there be discussion regarding air quality of communities outside of the project area that may be subject to smoke impacts from burning from within the project including Crowley Lakes, Benton, Bishop, and other outlying communities.

Section 3.6.2 Air Quality and Climate Change - Environmental Consequences- Proposed Action- Direct and Indirect Effects

- * The section could be improved in describing the GBUAPCD Smoke Management Program including the process for submissions of smoke management plans and ignition authorizations. The GBUAPCD's Smoke Management Program including District rules and regulations related in prescribed burning can be found at <https://gbuapcd.org/Docs/PermittingAndRules/Burning/SmokeMgmtProgram&WFU-OPs.pdf>.
- * The District recommends discussion and incorporation of specific actions that can be taken to reduce emissions from unpaved road dust including speed limits, water trucks, and rumble strips at interfaces between dirt roads and paved roads used by heavy equipment. There is also no

discussion of diesel equipment, but it seems probable that diesel emissions will be present from equipment.

- * Please see comments regarding Table 3.6-1 in the Air Quality and Greenhouse Gas Specialist Report.

Other Comments on Section 3.6.2 Air Quality and Climate Change and the EA Appendix

- * GBUAPCD recommends that the no action alternative (wildfire burn) be further qualitatively and quantitatively described with regards to air quality in the narrative. This is important to substantiate the difference in estimated air quality impacts of the proposed action versus no action (wildfire burn).

- * Recommend including additional information on the potential size, scale, and probability of the no action alternative wildfire burn.

- * Recommend the EA explain in more detail how both mechanical, hand thinning, and prescribed burning are conducted with regards to air quality and how they produce emissions during the various steps.

- * There is limited discussion on the air quality design criteria in the EA narrative and sections.

- * The Resource Checklist for Air Quality could incorporate additional steps to time and manage burning to minimize smoke impacts to communities and sensitive receptors.

Comments on Air Quality and Greenhouse Gas Specialist Report

- * Overall, the report is informative and well written, however there are still some corrections including the federal and state air quality designations as well as the current maintenance plan for the Town of Mammoth Lake PM10 Planning Area.

- * The District recommends additional discussion of outlying communities that may be subject to smoke impacts, especially from multi-day burns.

- * The District recommends the BlueSky inputs be provided that were used to generate Table 1 describing estimated emissions for different treatment scenarios. Although the methodology that is used is described in a limited way, it would be useful and necessary to see all the inputs used to generate the estimated emissions. The most critical piece of information missing is what size wildfire was used to generate the No Action Alternative wildfire burn emissions.