



October 16, 2018

Los Angeles Department of Water & Power
Attn: Jane Hauptman
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Subject: Comments on the Los Angeles Department of Water and Power Notice of Preparation for the Proposed Mono County Ranch Lease Renewal Project

Dear Ms. Hauptman:

Thank you for allowing Mammoth Lakes Recreation to provide comments for this proposed action and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Mammoth Lakes Recreation (MLR) has reviewed the Los Angeles Department of Water and Power's (LADWP) Notice Of Preparation (NOP) for the Proposed Mono County Ranch Lease Renewal Project (Project). Based on our review of the NOP, along with information provided at the scoping meeting on September 26, 2018, MLR would like to share the following concerns in advance of the forthcoming Draft Environmental Impact Report (DEIR).

- **Direct Impacts Upon Recreation:** Fishing and hunting are popular recreational activities in the project area. Several streams flow through the project area, collectively creating a vibrant fishery for various species of trout. These fisheries are a valuable recreational resource that is an important component of Mono County's economy. According to a 2009 Visitor Profile study conducted for the Mono County Economic Development Department, fishing is second only to hiking as the most popular outdoor activity for tourists. MLR is concerned that changes to the wetland meadow landscape anticipated as a result of the Project will adversely affect biodiversity, which may have significant impacts to the fishing resources in the project area. A full evaluation must be included in the DEIR to determine how the Project will impact recreational fisheries in Mammoth Creek, Hot Creek, Convict Creek, McGee Creek, Whiskey Creek, Hilton Creek, Upper Owens River, Crooked Creek and Crowley Lake, and how and where these changes might impact tourism in Mono County during peak fishing season.

Hunting of waterfowl is also a popular recreational activity in the project area. MLR is concerned that changes to the landscape may result impacts upon the hunting resources in the project area. MLR is also concerned that any changes to the protected status of the Bi-State Sage Grouse arising from the Project, may affect public access to the landscape. Impacts to the seasonal hunting resources, including access, must be analyzed in the DEIR

- **Indirect Impacts Upon Recreation:** Mono County is a popular destination for winter-sport enthusiasts. Mammoth Mountain Ski Area, June Mountain Ski Area, Tamarack Nordic Center all operate within the county, along with a host of public trail resources within the Inyo and Humboldt-Toiyabe National Forest. According to the National Ski Area Association, Mammoth Mountain alone received over 1.1 million skier visits during the 2012/13 season.

Global climate change is a significant threat to winter recreation in Mono County. According to the Indicators of Climate Change in California report, published the California EPA in May 2018, glaciers in the

Sierra Nevada have lost over 70 percent of their area on average due to global climate change. Wetland meadows are among the most efficient landscapes for carbon sequestration. The Project may result in significant loss of the wetland meadow habitat. Moreover, the desiccation of the landscape within the project area may increase dust and airborne particulates that settle on nearby glaciers and snowfields, precipitating accelerated ice and snowmelt. The DIER should clearly outline and carefully analyze the project impacts on global climate change and the State's adaptation strategies, including possible long-term impacts to winter sport recreation in Mono County.

- **Risk to Public Health and Safety:** Reduced irrigation supply may result in the conversion from a wetland meadow landscape to one filled with erosion and fire-prone, non-native vegetation. MLR is concerned that this transition will result in an increase of fugitive dust and airborne particulates, which may pose a public health risk. The project location is a popular training area for athletes, who come from around the world specifically to train at altitude. The Mammoth Track Club's base of operations is the Whitmore Track and Field Facility, immediately north of the project area. An increase in airborne dust and particulates may have a significant impact on these athletes ability to train, as well as posing a health risk to others in the area and surrounding communities, especially those who have existing respiratory conditions. A full evaluation must be included in the DEIR to analyze potential health and safety risks to the public from this project.
- **The NOP is Deficient:** MLR believes that the NOP released on August 15, 2018 did not provide sufficient information regarding the Project, the project location, or the project objectives to facilitate meaningful input by responsible agencies, interested stakeholders and the public concerning the scope and content of the forthcoming DEIR.
- **Project Alternatives:** The reasoning for the Project is not clearly defined, which prohibits responsible agencies, interested stakeholders, and the public from identifying potentially significant environmental impacts and commenting meaningfully on project alternatives. Therefore, it is not surprise that LADWP has provided no information on alternatives. Understanding that the estimated amount of water currently used for irrigation potentially finding its way back into the system may be as high as 85%, alternatives, including no-project alternatives, need to be provided in the DEIR.

In response to these concerns, MLR recommends that LADWP take the following actions:

- **Reinstate The Historic Water Allocation Baseline:** The physical conditions in the study area at the time of the NOP release (August 2018) do not represent the historic conditions under the past agricultural leases and water distribution practices. LADWP commenced a portion of the proposed project prior to conducting the required environmental review, and therefore it would be improper and misleading for LADWP to now utilize present conditions as a baseline for the current EIR. MLR therefore requests that LADWP immediately reinstate irrigation allotments to their historic levels (using the historic conditions between 2008 and 2013 as a baseline).
- **Prepare a New Notice of Preparation:** In order to sufficiently address deficiencies in the original NOP, MLR urges LADWP to prepare and release a new notice of preparation that complies with the requirements of CEQA Guidelines section 15082, with new scoping outreach to responsible agencies, interested stakeholders and the public and a new full review and comment period.

- **Provide Project Alternatives:** The DEIR should include all viable project alternatives, including no-project alternatives, for no other reason to provide clear and transparent documentation on the reasoning behind the Project.

Should you have any questions concerning the comments or suggested actions I've provided above, please contact me at (760) 660-4948 or via email at matt@mammothlakesrecreation.org.

Sincerely,



Matt McClain
Executive Director
Mammoth Lakes Recreation