



Wendy Longley
Project Manager
Federal Highway Administration
Central Federal Lands Highway Division
12300 West Dakota Avenue
Lakewood, CO 80228

Submitted via email: Wendy.Longley@dot.gov

Re: Reds Meadow Road Reconstruction EA

Friends of the Inyo is a locally-based nonprofit conservation organization based in Bishop, CA dedicated to the stewardship, exploration and preservation of the Eastern Sierra's public lands and wildlife. Over our 30-year history, Friends of the Inyo has become an active partner with federal land management agencies and a leading voice for natural resource protection and responsible recreation on public lands.

We are respectfully writing to express our concerns about the Reds Meadow Road Reconstruction proposal and believe the 1.5 lane with pull outs alternative needs careful consideration. In its current version the Environmental Assessment (EA) does not adequately address the cumulative impacts to visitor experience and wildlife. Project proponents and the environmental analysis state no significant increase in visitation, yet the Town of Mammoth Lakes (TOML) has agreed to a 30 year maintenance contract for the road, primarily based on the projected economic gain it will have to the TOML. TOML knows that by expanding, improving access and repaving this road there will be increased numbers of visitors to Devils Postpile National Monument and the Reds Meadow area. The Environmental Assessment does not discuss the possibility of the construction of a two lane road leading to more buses in order to bring more visitors to the Park, coupled with the need for more parking, which is a current issue not being addressed in the valley. Parking capacity and traffic congestion are an ongoing problem that will only worsen with better and safer access to the valley. Regardless of the alternative selected, the EA must present this issue and discuss the impacts.

The Reds Meadow valley and the Monument provide exceptional wildlife breeding and migratory habitat, hosting many listed and sensitive species. A two-lane road will not only require significant habitat modification but also poses a number of threats to wildlife not adequately addressed in the EA. Large retaining walls along the reconstructed route will be a barrier to wildlife (especially smaller species such as the declining Porcupine) using the road as a corridor or using the adjacent forested and spring/seep habitats. A 1.5 lane road will reduce driver speed and wildlife collisions. During the times the road is open to the public, and those using their private vehicles for camping, backpacking and boating, keeping the current speed limit is not enough. There is no enforcement of the speed limit and no agency plan for law enforcement during and after construction.

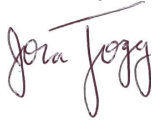
We highly recommend an analysis followed by implementation of moveable speed bumps, speed dips or other mechanisms for slowing vehicle speed. Second, we recommend the agencies with jurisdiction develop a law enforcement plan. Third, we recommend consultation with a wildlife biologist to incorporate wildlife crossing infrastructure with a focus on the spring and seep areas along the road where wildlife frequent. The construction and posting of wildlife signs are also critical. Fourth, during the breeding season construction noise should be minimized from dawn to mid-morning by establishing noise protocols, similar to other road construction projects in sensitive areas.

Although the EA acknowledges the presence of 12 species of bat, it then fails to analyze impacts to them during twilight and night driving hours. Particularly there are three sensitive species (Spotted bat, Western Mastiff, Long-legged Myotis), and seven other species of bat using the valley and adjacent forest habitat (along road corridor) on a regular basis. These species are frequenting the valley's meadows and other meadows of the high Sierra as they are driven out of the Central Valley because of changes to habitat and food sources. Two other species of particular concern are Northern Goshawk and Sierra Marten, which are Inyo National Forest Sensitive Species and candidates for Species of Conservation Concern. Both species use the habitat adjacent to the road for nesting and foraging. The EA's assertion of inadequate habitat due to canopy cover is false- both species are regularly seen in this area and some of the largest specimens of Red Fir (a tree species which both species utilize) exist along the road corridor.

We strongly encourage the TOML and the Inyo National Forest to establish a joint monitoring plan for wildlife impacts. Such a monitoring protocol could begin as early as next year, allowing a three-year period of data collection on wildlife collisions prior to 2021 construction. Data collection would continue during and following construction. This will allow agencies to track numbers and species of wildlife injuries and deaths and apply adaptive management if necessary.

In conclusion, we respectfully recommend revision of the final EA to incorporate the above items regarding wildlife and visitor use/experience. The adoption of a 1.5 lane road with pull outs will have the least cumulative impacts on wildlife and will help to control the number of buses and private traffic coming into the valley, thus providing a more pleasant visitor experience.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jora Fogg", with a stylized, cursive script.

Jora Fogg
Preservation Manager