

December 14, 2007

Mr. Larry Johnston
Mono County Planning Department
P.O. Box 347
437 Old Mammoth Road, Suite P
Mammoth Lakes, CA 93546

Dear Mr. Johnston:

Subject: June Lake Rodeo Grounds Environmental Scoping Comments

The Mono Lake Committee (MLC) is writing to provide scoping comments on the proposed June Lake Rodeo Grounds development project.

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 15,000 members, MLC has been active in the Mono Basin since 1978.

Thank you for the opportunity to submit comments during the scoping period for the Environmental Impact Report / Environmental Assessment (EIR/EA) for the June Lakes Rodeo Grounds project. As an organization, MLC's primary focus in regard to this project is issues related to water in the Mono Basin watershed. Therefore, our scoping comments will be focused on water – both water quantity and water quality.

Groundwater

The EIR must analyze and consider the effects of nearly doubling the population of June Lake and its water supply system. Groundwater extraction in the extended June Lake area could have adverse effects on the fisheries, riparian vegetation, wetland ecosystems, and stream and lake levels. In particular, MLC is very concerned about the effects on Rush Creek and ultimately Mono Lake.

Any groundwater extraction proposal should be studied for its *total* cumulative effects, and that includes planned improvements at the June

Mountain Ski Resort and associated water uses including proposed snow-making facilities.

Groundwater extraction can lead to surface water flow depletion and any extraction proposal should analyze the potential effects on surface water in the June Lake area. This is especially important given the recreational (and therefore economic) value that the streams and lakes provide in the June Lake area.

Water Quality Impacts

A development proposal that essentially more than doubles the current population of June Lake must analyze and address water quality issues including planned actions to maintain and monitor the existing water quality of the area. Analysis of the existing sewage treatment facility and assumed expansion of that facility must be included and specifically detailed. In addition, any construction for the expansion of the sewage treatment facility should be constructed and operating *before* the occupancy of any phases of the proposed development.

Storm water Runoff Issues

Given the proposed size and magnitude of this project in relation to the existing community, a thorough storm water runoff analysis must be completed. A significant increase in impermeable and paved surfaces replacing natural conditions will exacerbate the current runoff issues, especially given the slope and limited run-out area. Impacts to wetlands, riparian areas, fragile meadow habitat, and other natural landscapes must be analyzed for any potential adverse effects.

Wetland Protection

All existing wetland areas should be identified and avoided to preserve the natural landscape and preserve habitat values.

Recreational Impacts

An almost doubling of the current June Lake population most likely results in a significant increase in recreation in the June Lake area and therefore needs to be evaluated. Focusing primarily on water, an increase in

recreational motorized boating and fishing should be analyzed for any impacts to the water quality of the lake and stream system. In addition to forecasting the effects of increased use on the lakes, baseline water quality data should be collected and analyzed to be used as comparative tools in the future. Recreational use quotas may need to be considered in order to protect the existing water quality.

Water Supply

A Water Supply Assessment (WSA) is required for this project under SB 610 and must include 1) a 20 year-projection of the “public water system’s total projected water supplies available during normal, single dry, and multiple dry water years,” 2) an accounting of existing and future demand, and 3) an analysis of whether the system’s supplies will be sufficient to meet the additional demand of the project. If groundwater is part of the projected water supply, the WSA must state whether the groundwater basin has been adjudicated, whether the proposed project-related withdrawals will result in overdraft of the basin, and it must describe any efforts to eliminate any long-term overdraft in the basin.

Cumulative Impacts

Any improvements to the June Mountain Ski Resort and/or changes that are consumptive uses of water need to be analyzed concurrently with the June Lake Rodeo Grounds proposal because they are cumulative impacts to water supply and water is a finite resource.

Coordination with Los Angeles Department of Water and Power

The Los Angeles Department of Water and Power (LADWP) is the major water rights holder in the Mono Basin watershed. LADWP has obligations for the management of Grant Lake Reservoir and delivery of water to Rush Creek and Mono Lake. LADWP also has obligations for delivery of water to the City of Los Angeles. In MLC’s experience, it is extremely likely that there are water matters related to this project that are entangled with LADWP’s water rights. A process should be established with LADWP to identify those issues and address their impact on the project proposal.

Snow Making

The proposed additional snow making operation is a consumptive use of water and therefore needs to be analyzed for its additional effects on water quantity and water quality. Snow making may have adverse effects on the natural environment and may include things such as the depletion of surface water flow or impacts to groundwater supply. In addition to water source impacts, impacts to air quality should be analyzed depending on the method used for producing additional snow. Also snow making is high energy consumptive operation and therefore renewable energy sources should be evaluated for this project.

Conclusion

Thank you for the opportunity to provide scoping comments on the proposed June Lake Rodeo Grounds project. We hope that these comments help to guide the very arduous environmental review process that lies ahead. The June Lake area is an environmentally unique and sensitive area and great care and concern should be employed when assessing the impacts of such a significant change to the landscape.

MLC formally requests that we be included on any future public communication related to this project and any materials and /or documents that are distributed as the project moves forward.

Sincerely,

Lisa Cutting
Eastern Sierra Policy Director