



MONO LAKE COMMITTEE

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October 6, 2020

Via email to mdraper@mono.ca.gov

Michael Draper

Mono County Community Development Department
PO Box 347
Mammoth Lakes, CA 93546

Re: Comments on the Description of Alternative 7 and Concept Site Plan and
Landscape Concept Plan

Dear Mr. Draper,

The Mono Lake Committee (MLC) is writing to comment on the Tioga Inn revised “Alt #7 Housing Concept Site Plan” and “Landscape Concept Plan” released to the public on September 29, 2020.

Since the Notice of Preparation phase of the Tioga Inn project in 2016 and continuing through the Draft Subsequent Environmental Impact Report and the Final, MLC has commented on the potential impacts and urged for mitigations that consider the Mono Basin community, Mono County residents, and future visitors to Mono Lake. The scenic grandeur of the Mono Basin is one of the wonders of California and the world, and this project continues to elude the implementation of measurable visual criteria for reducing or eliminating significant, adverse impacts to aesthetics, light, and glare.

While multiple project changes have occurred leading to the latest revised Alt #7 Housing Concept Site Plan and Landscape Concept Plan, the project proposal fails to provide specific, measurable screening criteria for mitigating aesthetic and visual impacts to visitors that frequent high-value recreation sites within the Mono Basin National Forest Scenic Area and the Mono Lake Tufa State Natural Reserve.

The new Landscape Concept Plan, which has been modified from the earlier Screening Tree Plan and is incorrectly identified as Attachment 4 (it appears to be Attachment 2 in Narrative Description), falls short of providing meaningful screening measures. The near absence of native Eastern Sierra tree species appropriate to the elevation and locale, introduces questions regarding the ability of a non-native forest to successfully thrive. Only one identified species, Quaking Aspen, is known to successfully inhabit the Mono Basin at the project elevation

and aspect. While Limber Pine and Ponderosa are native to the Sierra Nevada, only Limber Pine occurs in the Mono Basin, and its occurrence is sparse at elevations above 9,000 feet. Colorado Spruce, Austrian Pine, and White Birch are not native to the Sierra Nevada nor the Mono Basin and these trees will, in a concentrated, urban forest arrangement, offer a significant contrast to the surrounding Mono Basin landscape flora. This concentrated planting of a non-native forest has no historical precedence and will have an unknown impacts on wildlife—from insects to birds to mammals. We urge the plan to specify only tree species native to the Eastern Sierra, as originally identified in the Screening Tree Plan.

Mitigating visual impacts

As MLC has stated in previous comments, visual impact mitigations should provide clearly stated performance criteria to ensure that the mitigation purpose is accomplished. Mitigation Measure 5.12(a,b-2) (Visual Screening & Landscaping) does not define “screening efficacy,” nor are there measurable, objective standards for the “visual analysis expectation.” There is no reference to the “visual analysis expectation” in the Narrative Description or in prior project documents. While the mitigation measure suggests that some goal may be in place to screen project walls, windows, and roofs, that goal is not clearly articulated and the offsite locations from which “screening efficacy” may be judged are not identified.

MLC recommends the following mitigation language to solve these shortcomings in Mitigation Measure 5.12(a,b-2):

None of the housing structures or parking areas shall be visible from public vantage points including (1) the shore of Mono Lake at South Tufa, (2) Navy Beach, (3) from the top of Panum Crater, and (4) US 395 between the junction of Hwy 120 W and Test Station Rd, and (5) the Mono Lake Tufa State Natural Reserve boardwalk at Mono Lake County Park. A housing structure or parking area is “visible” if an individual can see any part of the buildings or parked vehicles or any reflection, glare, or other light from the housing or moving and parked vehicles at any time. County staff shall monitor compliance with this mitigation measure by conducting visual inspections from each of the public vantage points listed above at least four times per year, at least once per quarter. At least one visual inspection per year per public vantage point shall be conducted after dark, at least one shall be conducted in the two hours after dawn, and at least one shall be conducted in the two hours before dusk.

This performance standard provides flexibility for the applicant in terms of how the standard is met (i.e., additional grading/berms, vegetation, etc.) However, meeting the measure’s standards by conducting additional grading may result in fewer environmental impacts, specifically related to fire danger and water usage, than meeting the standards by, for example, planting trees and other vegetative screening.

The vantage points identified are consistent with prior comments and include scenic corridors with visual quality objectives identified in the Mono Basin National Forest Scenic Area Comprehensive Management Plan.

Thank you for the opportunity to comment. We would be happy to answer any questions you might have regarding our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bartshé Miller". The signature is stylized and written in a cursive-like font.

Bartshé Miller
Eastern Sierra Policy Director