



DEPARTMENT OF PARKS AND RECREATION

Ruth Coleman, *Director*

Sierra District
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Caltrans
Mike Donahue
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RE: Mono Lake Shoulder Widening Project Draft Environmental Impact Report

Thank you for the opportunity to comment on the proposed Mono Lake Shoulder Widening Project Draft Environmental Impact Report (DEIR). The proposed project will widen and realign about three miles of Highway 395, and increase the speed limit adjacent to Mono Lake and the Mono Lake State Tufa Reserve. In addition, several pullouts will be built drainage problems addressed and rock outfall safety facilities installed.

In summary, California State Parks maintains the same general position we expressed in our October 10, 2001 letter to Caltrans. As the project is currently proposed we support the No Action Alternative.

The Department supports the No Action Alternative because the need for the project has not been clearly articulated in the DEIR and the substantial environmental impacts that will occur to the Mono Lake Tufa State Reserve have not been properly disclosed.

Although safety was described as the main reason for the project, Caltrans own statistics indicate the stretch of highway proposed for work is as safe or safer than the statewide average. So why spend \$14,000,000 on a safe stretch of highway?

In addition, if safety is the main reason for the project, other options less environmentally damaging should be implemented, such as lowering the speed limit, developing one, well-planned overlook pullout, and improving the ingress/egress to the Old Marina day use area. These actions would make more sense than increasing the speed limit and be substantially less expensive. These actions would also result in travelers along Highway 395 enjoying this state treasure more, rather than speeding through area faster than they currently do.

Environmentally, the tenuous thin strip of land between the lake and highway will be narrowed even more if the project proceeds. In many ways this will effectively eliminate the terrestrial wildlife habitat and increase threats to the aquatic habitat along this strip.

We are not opposed to the rock outfall and drainage work described in the DEIR from taking place as long as the impacts are separately described and mitigated for.

Specific comments regarding the DEIR include:

- It is not clear what the project is – The DEIR describes the project in the Summary then describes several alternatives. Is the summary description the actual project being proposed by Caltrans?
- Impact analysis should be benchmarked on both the existing lake level and the future mandated Lake Level. This is a fundamental flaw in the document. Analysis of impacts should include the future lake level, as this will increase the chance of direct runoff into the lake from the highway and the possibility of hazardous materials entering the lake from accidents on the highway or vehicles careening into the lake.
- The project should request and obtain a full U.S. Army Corps of Engineers Permit, not a Nationwide Permit for Road Crossings. The project and associated impacts are way beyond a road crossing Nationwide Permit project (3 miles of straightening and widening). In addition, does the project take into account temporary impacts to wetlands associated with temporary access roads for construction and equipment? Will temporary roads be constructed on State Park Reserve lands?
- One of the biggest impacts of the project is the scenic impact the project will have for users of the lake and the reserve. The mitigation for scenic and vegetation impacts seems overly optimistic. Exact mitigation performance goals need to be described in a Mitigation and Monitoring Plan. Please reference other revegetation projects Caltrans has accomplished on the east side that have been successful in such a short time period. The revegetation plan and performance goals must be part of the DEIR with associated penalties for non-compliance to insure success of the mitigation.
- Impacts and associated mitigation for the various project elements need to be separately described e.g. rock outfall safety construction and mitigation, drainage construction and mitigation, pullout construction and mitigation, realignment construction and mitigation etc. Lumping all of the impacts together does not provide a basis for impact analysis.
- There should be better descriptions of how the project interfaces with federal 4(f) regulations, the Mono Basin National Scenic Area designation, Mono Lake as an Outstanding National Resource Water designation, and the Mono Lake Tufa State Reserve. These are all important land use designations in proximity to the project that require more attention than the DEIR has given to them.

Thank you again for the opportunity to comment on the Mono Lake Shoulder Widening Project DEIR. If the project proceeds in some fashion the Department plans to submit an Environmental Enhancement Grant Application for Roadside Recreation to improve facilities at the Old Marina Day Use Area. We look forward to working with Caltrans on that project should it receive a grant. If you have any questions please call at (530) 525-9535 or email at kande@parks.ca.gov.

Sincerely,

Ken Anderson
Senior Ecologist

Cc
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