November 5, 2013
Regular Meeting
Item #9a

Community Develop.

GPA #13-002
Central Business Parking Districts

Mono County Board of Supervisors

GPA 13-02 – Central Business Parking Districts & Minor Countywide Parking Regulations Update

#9a

1/10	Planning Commission Workshop
2/19	Board of Supervisors Workshop
5/16	Bridgeport RPAC
6/4	June Lake CAC
6/12	Mono Basin RPAC
6/13	Planning Commission Update
7/11	Planning Commission GPA Hearing
7/18	Bridgeport RPAC
8/6	June Lake CAC
8/14	Mono Basin RPAC
10/10	Planning Commission GPA Hearing
11/5	Board of Supervisors GPA Hearing

District Boundaries

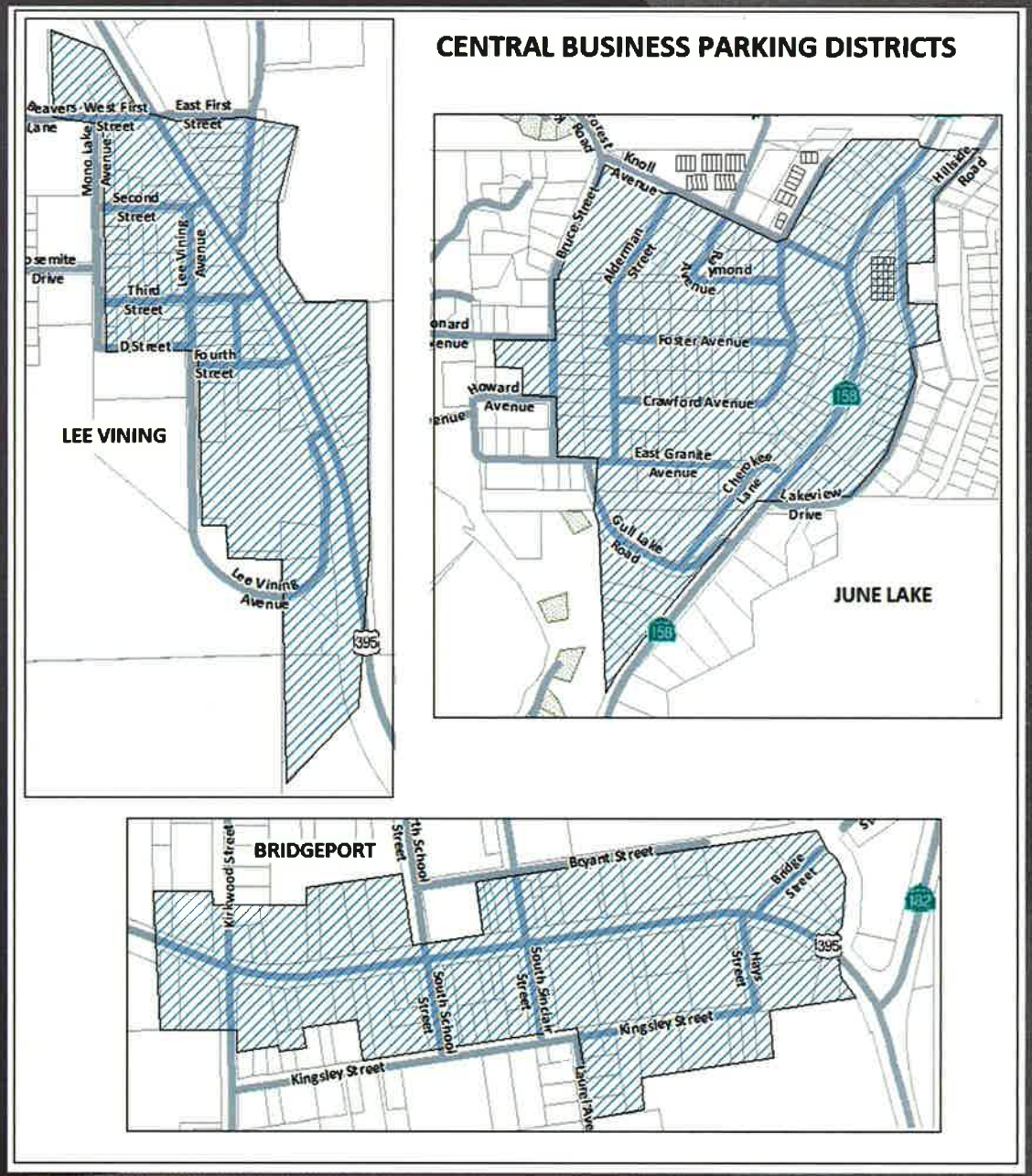
Bridgeport &
Lee Vining

C LUD

June Lake

C, MU & CL LUDs

40-50% Reduction



Change of Use:

If a new use of a building requires greater off-street parking than the previous use, additional off-street parking is required in an amount equal to the difference between the parking required of the new use and the parking required of the old use, **regardless of the existing parking supply.**

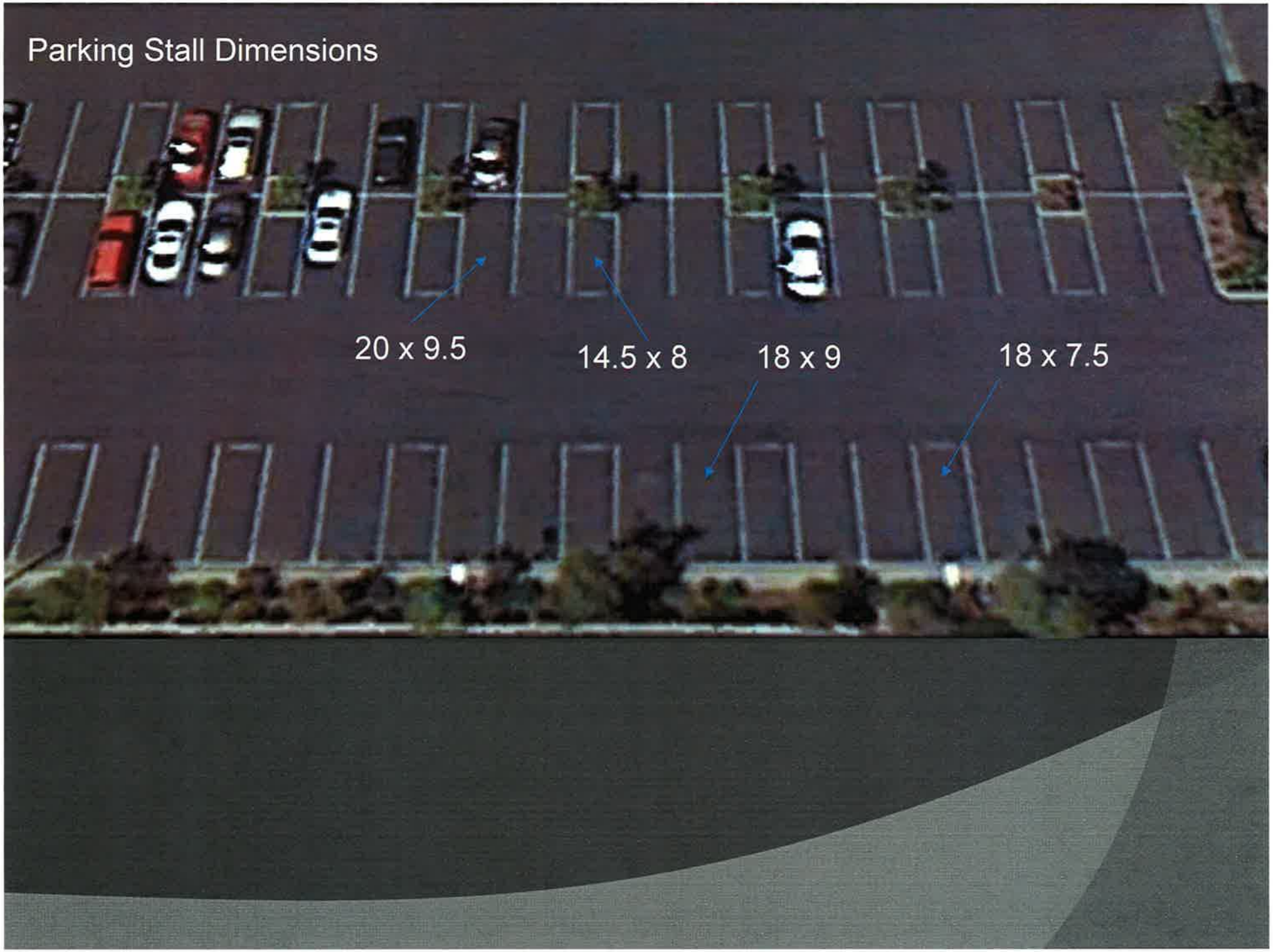
Parking Management Plan:

- Part of Director Review or Use Permit
- Expanded Off-Site
- Alternate Parking Stall Size
- Tandem Parking
- Off-Site Joint Use (Shared)
- Space Substitution

Off-Site

Off-Site

Off-Site


Parking Stall Dimensions
20 x 9.5
14.5 x 8
18 x 9
18 x 7.5

Tandem

Tandem


Big Rock Rd
Knoll Ave
Crawford Ave
Skyline Rd
Raymond Ln
Foster Ave
158
Lakeview Dr
Howard Ave
S Crawford Ave
Granite Ave
Cherokee Ln
Gull Lake Rd


Shared
31
Sunday in July
10
21
Hayes St
32
Tuesday in June
18
14
Hayes St

Substitution

Reorganization & 13 Additional Changes to Chapter

General Plan Consistency

CEQA: Addendum to General Plan EIR

Planning Commission Recommendation:

1. Accept Addendum 13-01 to the Mono County General Plan EIR

2. Adopt General Plan Amendment 13-02: Central Business Parking Districts & Minor Countywide Parking Regulations Update.

November 5, 2013
Regular Meeting
Item #9b

Community Develop.

Comment Ltr. To Fish & Wildlife Service on Proposals to List the Sierra Nevada Yellow-Legged Frog and Yosemite Toad, and Designate Critical Habitat

Suggested Changes

BOARD OF SUPERVISORS
COUNTY OF MONO
P.O. BOX 715, BRIDGEPORT, CALIFORNIA 93517
(760) 932-5538 • FAX (760) 932-5531
Lynda Roberts, Clerk of the Board

November 5, 2013

Ms. Jan Knight
Acting Field Supervisor
U.S. Fish and Wildlife Service
Sacrament Fish and Wildlife Office
2800 Cottage Way Room W – 2605
Sacramento, CA 95825

RE: Comments on proposed rules and critical habitat for the Sierra Nevada yellow-legged frog and Yosemite toad

Dear Ms. Knight:

The Mono County Board of Supervisors appreciates your consideration of our comments in response to your request for additional scientific information to ensure the best possible application of the Endangered Species Act (ESA) and recovery of Sierra Nevada yellow-legged frog and Yosemite toad, while also minimizing impacts to the rural economy and communities of Mono County. We seek to make the Service aware of recent data regarding Sierra Nevada yellow-legged frog that leads to logical changes in the proposed critical habitat designation, recent peer-reviewed primary research that specifically responds to areas of doubt expressed in the assessment of threats (and the consequent management implications) for the Yosemite toad, and demonstrate that the benefits of excluding certain critical habitat areas and downgrading certain threats are significant due to the avoidance of economic impacts, while inclusion provides no biological benefit to the amphibians. From an ecological basis, we are concerned that the few remaining populations of both species in Mono County and elsewhere east of the Sierra Nevada crest will be inadvertently lost despite listing unless threats and opportunities are correctly identified now to focus recovery work on the real issues that will make a difference.

In Mono County, we have an additional concern that the cumulative economic impacts of this proposed action, taken together with the proposed listing of and critical habitat designation for the Bi-State sage grouse, would have a catastrophic effect on the economic health of our communities and the Mono County region. Between the two amphibians and the sage grouse, 82% of private properties in Mono County and our major tourism and recreation locations could be impacted.

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We are requesting that the Service incorporate habitat suitability data by identifying and deleting proposed locations where trout and fungus cause Sierra Nevada yellow-legged frog recolonization to be currently intractable. Once the trend toward rapid species extinction has been arrested by identifying biological and management solutions for *Bd* and self-sustaining trout populations in larger, highly-connected water bodies, no statutory restriction exists to reconsidering critical habitat boundaries for possible expansion.

Our review of the CDFW's monitoring data (2013a) and the current pattern of recreational fishing use within watersheds consisting of large, highly-connected water bodies indicates that the following areas are inherently incompatible with goals for the recovery of Sierra Nevada yellow-legged frog. For all exclusion requests, we have given deference to the CDFW's identification of recovery sites based on sound ecological criteria for re-introduction success. We believe the Service must reasonably explain how the inclusion of the following sites could possibly aid in or ensure conservation of the species, or must exclude them from the critical habitat designation:

- **Saddlebag Lake, Ellery Lake, Tioga Lake, and Lee Vining Creek** between these lakes (Subunit 2M),
- **Gem Lake, Waugh Lake, and Rush Creek** between these lakes (Subunit 3B).
- In Inyo County, **Rock Creek Lake and Rock Creek** downstream from the lake (Subunit 3D).

All of these areas are frogless, front-country (or nearly so), large lakes with self-sustaining and heavily-used fisheries. All are accessible by paved roads or occur along major trails within easy travel distance for anglers. Long-standing dams are operated (at Saddlebag, Ellery, Tioga, Gem, and Waugh Lakes) further impacting habitat functionality. All attract high annual site visits according to the United States Department of Agriculture (USDA) Forest Service Natural Resource Manager website for National Visitor Use Monitoring Results, Version 2.1.2.37, as follows:

- **16,556 estimated annual site visits** to Subunit 2M based on use at Ellery Lake campground, Saddlebag Lake campground, Tioga Lake campground, and Tioga Pass Resort (USDA Forest Service, Proxy Results by Site).
- **3,372 estimated annual site visits** to Subunit 3B derived by combining visitation data for Oh! Ridge campground, June Lake campground, Gull Lake campground, Reversed Creek campground, Silver Lake campground, Silver Lake Resort RV Park, Boulder Lodge, and Silver Lake Resort Cabins for a total of 112,416 (USDA Forest Service, Proxy Results by Site), and then multiplying by the 3% of visitors estimated to use wilderness areas such as those of concern in this subunit (USDA Forest Service, Annual Visitation Estimate). Therefore, 112,416 site visits x 3% = 3,372 estimated site visits.
- **152,593 estimated annual site visits** to Subunit 3D based on use at Mosquito Flat campground, Rock Creek Lake campground, Pine Grove campground, Tuff Campground, East Fork campground, Palisade campground, Iris Meadow campground, French Camp campground, Big Meadow campground, Rock Creek Lake

Yosemite Toad

We concur that Yosemite toad decline is a long-term result of an historic legacy of unregulated, destructive use of montane meadows. The critical tadpole requirement for warm pools, which prior to these uses was sustained by functional meadow water storage and perching of groundwater, is maladaptive to the rapid flow-through hydrologic regime that now operates within large portions of the Yosemite toad historic range. The climate change model cited in the proposal is apparently not peer-reviewed; however, it would appear reasonable to assume that global warming will exacerbate the toad's dilemma (Viers et al. 2013). As we cannot turn back the clock or avoid climate change, we conclude the damage is done. The point is made explicitly in order to contrast with the proposal's unfounded extrapolation of these legacy effects to modern livestock rotation and stocking practices under the management of the U.S. Forest Service (USFS). It is not proven, as described below, that current regulated grazing is a significant threat deserving of additional regulation under the ESA. We offer this point and supporting best available scientific documentation because it is important that the actual threat – the historic damage already done – be identified correctly so the appropriate remediation can be called for in the Service's final analysis. Meadow hydrology restoration methods with proven efficacy to mitigate the legacy of meadow damage should replace additional, speculative regulation of modern grazing practices.

Current research demonstrates that restoration of critical wetland hydrology can be accomplished regardless of the presence or absence of grazing as currently practiced. Published research has specifically disproven the negative relationship that is hypothesized within the Yosemite toad proposed rules. Culpable ongoing degradation of toad habitat, for example breeding and larval pool eutrophication or food web disruption, would have been observed where grazing is now being allowed, or direct impacts of trampling and removal of the vegetation upon which toads rely for cover would have been documented. However, these relationships and effects have not been found. No differences in breeding pool water amount or quality were found during multi-year comparisons between currently grazed and ungrazed meadow systems (Roche et al. 2013a). Monitoring of meadows within the Inyo National Forest (37 sites) found no comparative differences in plant species diversity/richness, soil stability, or meadow habitat suitability for Yosemite toad after 10 years of either livestock grazing or exclusion (Roche et al. 2013b). If practices of modern livestock grazing on federal lands were contributing to the current Yosemite toad decline, then this focused research of the last decade would have detected some correlation between livestock presence and local toad population loss. Finally, the Service should consider the full wealth of data collected by the U.S. Forest Service's Sierra Nevada Amphibian Monitoring Program, rather than merely citing census numbers in the proposed rules. For example, their survey of 134 Yosemite Toad meadow habitats has documented a significant *positive* relationship between managed grazing of meadows and persistence of toad populations (Brown et al. 2012, 2013). In Mono County, positive trends indicating the compatibility of livestock grazing using modern practices have been documented by CDFW (2013b), including the long-term persistence of toad populations within permitted grazing allotments in the Sonora Pass area (proposed Critical Habitat Unit 2).

project. Rocks placed carefully would effectively and permanently solve the overly rapid drainage that has been created by historic use. In every case, large habitat *areas* will be restored by treating hydrologic nick *points*. Critical habitat - denser and more diverse meadow swards, and embedded warm water pools during the Yosemite toad breeding period - is provided because conditions of normally sustained shallow groundwater is restored meadow-wide. This reasoning also applies to Sierra Nevada yellow-legged frog, as returning a lacustrine meadow system to its normally more mediated rate of meltwater transmission results annually in a condition of deeper water at the critical late-season time when freezing becomes a limit upon tadpole survival. Re-focusing priority to repairing historic hydrologic nicks will rapidly bring about area-wide habitat benefits. Identifying this precise mechanism as a target for ongoing maintenance work, rather than imprecise, generalized notions about further restrictions on recreation and current permitted uses, would provide a more appropriate basis for the pending Recovery Plan. For any meadow habitat, use of rocks to raise the water table meadow-wide would be compatible with the uses that currently support recreation and tourism, the primary sector of the local economy. As in the past, we expect access and use patterns to simply adapt to the new (in this case restored) condition, as neither humans nor livestock prefer to occupy meadow areas that are muddy, marshy and boggy.

Economic Impacts

While the Service has stated recreation use is not considered a significant threat to the Sierra Nevada yellow-legged frog and Yosemite toad, the proposals also cite recreation as being "incompatible" with recovery. Therefore, we are compelled to address the certain economic impacts to recreation that will arise from this designation, as it is the top economic sector in Mono County. The analysis is conducted at a coarse scale and predicated upon a "worst-case scenario" to demonstrate the potential scale of impacts. Disclosure of anticipated management mechanisms and/or more detailed data would assist with a more constrained analysis.

According to the USDA Forest Service National Visitor Use Monitoring Program, Version 2.1.2.37, the total annual spending associated with non-local visitors to the Inyo National Forest, which covers both Inyo and Mono counties, exceeds $265.8 million annually (USDA Forest Service, Annual Total Spending by Market Segment), excluding visits for downhill skiing. Of those non-local visitors, approximately 47.2% responded that hiking, walking or backpacking was their main reason for visiting and 17.5% cited fishing (USDA Forest Service, Activity Participation), while 90% cited recreation as their main purpose for visiting (USDA Purpose of Visit by Visitors Who Agreed to be Interviewed). Mono County's visitation numbers indicate 1,289,000 visitors in the spring/summer/fall spending $223 million (Lauren Schalu Consulting, 2009). Of these visitors, 38.7% participated in fishing, and 47% participated in hiking.

If all the visitors participating in fishing were to vacation elsewhere due to new restrictions, the economic analysis demonstrates visitor spending could be reduced by $87 million in Mono County ($223 million x 38.7%). If restrictions on hiking activities are also imposed and those visitors choose to go elsewhere, the economic impact in Mono County could be $104.8 million ($223 million x 47%) for a total up to $189.6 million for fishing and hiking combined. The

coupled with major impacts to the two biggest economic sectors – tourism and agriculture – is an unthinkable "double whammy" for a small, rural county like ours to absorb.

Conclusion

Our concern at this point is to ensure critical habitat and the threats to the Sierra Nevada yellow-legged frog and Yosemite toad are correctly identified now to stop the precipitous decline of these species and support their eventual recovery while also minimizing impacts to the rural economy and communities of Mono County. For the Sierra Nevada yellow-legged frog, the historic range of the species is not the correct basis for designation of critical habitat. We are requesting that the Service exclude those locations we identified in Subunits 2M, 3B and 3D where re-colonization is currently intractable due to trout and fungus. Additionally, we request recreation be downgraded to "not a listing factor" due to lack of data. For the Yosemite toad, we request the Service correctly identify the actual threat of historic meadow damage; downgrade livestock grazing and pack stock use under current USFS management, as well as recreation, to "not a listing factor;" and focus on meadow hydrology restoration methods with proven efficacy to repair historic meadow damage. Excluding critical habitat areas and downgrading threats as requested would not result in extinction based on the included scientific data demonstrating no biological benefit to the species, and avoids economic losses of up to $191.9 million annually in Mono County alone.

Thank you for taking the time to consider the additional scientific information we have presented and the position the data have led us to take. We appreciate the challenging political, environmental and social position of the Service, and hope that our analysis will assist the Service with identifying the true threats to the amphibians and modifying the critical habitat designation to reflect local habitats in Mono County best suited for successful preservation and recovery of these species.

Respectfully,

Byng Hunt
Chair

CC: Congressman Paul Cook
Senator Dianne Feinstein
Senator Barbara Boxer
Rural County Representatives of California (RCRC)
California State Association of Counties (CSAC)

Roche, LM, Latimer, AM, Eastburn, DJ, and KW Tate, 2012. Cattle grazing and conservation of a meadow-dependent amphibian species in the Sierra Nevada. PLos One 7(4):e35734.

Roche, LM, Kromschroeder, L, Atwill, ER, Dahlgren, RA, and KW Tate, 2013a. Water quality conditions associated with cattle grazing and conservation and recreation on national forest lands. PLos One 8:e68127.

Roche, LM, Frietas, M, Weixelman, D, Lile, D, Oles, K, Jackson, A, and A Yost, 2013b. Meadow Conditions on National Forest Grazing Allotments: First findings – The influences of changing precipitation and grazing management on Sierra Nevada mountain meadow plant community attributes and function. www.plantsciences.ucdavis.edu/plantsciences_faculty/tate/main/projects/sierra_nevada_meadows_inyo.html, U.C. Davis Rangeland Watershed Laboratory.

United States Department of Agriculture (USDA) Forest Service, n.d. Activity Participation. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/VD04?filename=Activities.

United States Department of Agriculture (USDA) Forest Service, n.d. Annual Total Spending by Market Segment. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/E05?filename=Total_Spending_by_Segment.

United States Department of Agriculture (USDA) Forest Service, n.d. Annual Visitation Estimate. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/VE01?filename=Visitation.

United States Department of Agriculture (USDA) Forest Service, n.d. Natural Resource Manager, National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2.

United States Department of Agriculture (USDA) Forest Service, n.d. Proxy Results by Site. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/IDF02?filename=Proxy_Summary.

United States Department of Agriculture (USDA) Forest Service, n.d. Purpose of Visit by Visitors Who Agreed to be Interviewed. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/SP04?filename=Purpose_of_Visit.

United States Department of Agriculture (USDA) Forest Service, Inyo National Forest, 2013. Appendix BB, 2013 Annual Operating Plan. Received from: Carmen John, White Mountain and Mt. Whitney Ranger Districts, Recreation Special Uses, Bishop.

United States Department of Agriculture (USDA) Forest Service, Toiyabe National Forest, 1999. Sample Grazing Permit – Part 3 (Reference FSM 2230). Received from: Rixey Jenkins, Bridgeport Ranger District, Range Management Specialist, Bridgeport.

November 5, 2013
Regular Meeting
Item #9e

Community Develop.

Sage Grouse Listing by US Fish & Wildlife Service

Larry Johnston ~ District One Fred Stump ~ District Two Tim Alpers ~ District Three
Tim Fesko ~ District Four Byng Hunt ~ District Five

BOARD OF SUPERVISORS
COUNTY OF MONO

P.O. BOX 715, BRIDGEPORT, CALIFORNIA 93517
(760) 932-5538 • FAX (760) 932-5531
Lynda Roberts, Clerk of the Board

November 5, 2013

Ms. Jan Knight
Acting Field Supervisor
U.S. Fish and Wildlife Service
Sacramento Fish and Wildlife Office
2800 Cottage Way Room W – 2605
Sacramento, CA 95825

RE: Comments on proposed rules and critical habitat for the Sierra Nevada yellow-legged frog and Yosemite toad

Dear Ms. Knight:

The Mono County Board of Supervisors appreciates your consideration of our comments in response to your request for additional scientific information to ensure the best possible application of the Endangered Species Act (ESA) and recovery of Sierra Nevada yellow-legged frog and Yosemite toad, while also minimizing impacts to the rural economy and communities of Mono County. We seek to make the Service aware of recent data regarding Sierra Nevada yellow-legged frog that leads to logical changes in the proposed critical habitat designation, recent peer-reviewed primary research that specifically responds to areas of doubt expressed in the assessment of threats (and the consequent management implications) for the Yosemite toad, and demonstrate that the benefits of excluding certain critical habitat areas and downgrading certain threats are significant due to the avoidance of economic impacts, while inclusion provides no biological benefit to the amphibians. From an ecological basis, we are concerned that the few remaining populations of both species in Mono County and elsewhere east of the Sierra Nevada crest will be inadvertently lost despite listing unless threats and opportunities are correctly identified now to focus recovery work on the real issues that will make a difference.

In Mono County, we have an additional concern that the cumulative economic impacts of this proposed action, taken together with the proposed listing of and critical habitat designation for the Bi-State sage grouse, would have a catastrophic effect on the economic health of our communities and the Mono County region. Between the two amphibians and the sage grouse, 82% of private properties in Mono County and our major tourism and recreation locations could be impacted (see map of proposed critical habitat in Mono County in Exhibit A).

Sierra Nevada Yellow-Legged Frog

The listing proposal for Sierra Nevada yellow-legged frog clearly demonstrates that the species is in decline, and that the pace of this decline is alarming. We understand that this species was present and abundant in many more alpine settings than is indicated by current CDFW census data (CDFW, 2013a), as recollected by elder citizens. The greatest priorities to avoid extinction now must be 1) arresting the trend, and 2) stabilizing remaining populations as sources for recolonization in the nearest term. We request that these priorities be addressed explicitly in the final listing documents with the identification of actions to bring about the immediate leveling, if not reversal, of this precipitous decline. Because loss of this species' distribution is ongoing and has accelerated locally within the last decade (James Erdman, personal communication 8/27/13), effort must be correctly prioritized to support survival and recovery.

As a priority, critical habitat should focus on the preservation of extant populations and areas with the potential to contribute to the recovery of the species due to sufficiently intact Primary Constituent Elements (PCEs). We have carefully studied the full set of water bodies in Mono County that 1) have at least some potential for Sierra Nevada yellow-legged frog occupancy (specifically, tadpole survivorship to metamorph) based upon liquid water presence in winter, and 2) are included within critical habitat as currently proposed. Overlaying these with known presence of the two identified primary drivers of species extinction, long-term predatory trout population presence and the more recent *Batrachochytrium dendrobatidis* (*Bd* or chytrid fungus) infection, we have identified water basins in or adjacent to Mono County that are arguably not, and likely never will be, suitable for habitat. These areas should be excluded from the critical habitat designation as the PCEs have been altered in ways that are practically unrecoverable.

Habitat alteration from naturally-evolved, amphibian-dominated waters to the current situation of salmonid top predator dominance is irreversible in some settings. Self-sustaining populations of trout, especially those within highly connected water bodies, would require many years to eradicate, if it is even possible, and would carry a substantial financial burden to do so. We realistically would expect removal efforts in those celebrated lakes and streams where recreational fishing has become entrenched to be sabotaged by the disgruntled public. *Bd* presence similarly signals a long-term if not permanent habitat alteration, and is capable of single-handedly exterminating extant populations regardless of fish presence. All 18 remaining populations in Mono County are monitored using the level of *Bd* presence on the skin (CDFW, 2013a), as outbreaks of heavy skin *Bd* load predictably and rapidly lead to transmission and extinction in connected alpine basin lakes (Vredenburg, et al. 2010). Where this situation exists in the absence of physical and enforceable barriers to trout dispersal, it is inconceivable that translocated Sierra Nevada yellow-legged frogs will survive to participate in the recovery of the species. Bringing this species back from near-extinction will be realized more surely by conceding now that the historic range of the species is not the correct basis for current and future expenditures of funds, effort, and re-introduction. Rather, the biologically-available range, defined by those water bodies where trout and chytrid fungus will not synergistically enforce rapid (re-) extirpation, should delineate critical habitat designation boundaries.

We are requesting that the Service incorporate habitat suitability data by identifying and deleting proposed locations where trout and fungus cause Sierra Nevada yellow-legged frog recolonization to be currently intractable. Once the trend toward rapid species extinction has been arrested by identifying biological and management solutions for *Bd* and self-sustaining trout populations in larger, highly-connected water bodies, no statutory restriction exists to reconsidering critical habitat boundaries for possible expansion.

Our review of the CDFW's monitoring data (2013a) and the current pattern of recreational fishing use within watersheds consisting of large, highly-connected water bodies indicates that the following areas are inherently incompatible with goals for the recovery of Sierra Nevada yellow-legged frog. For all exclusion requests, we have given deference to the CDFW's identification of recovery sites based on sound ecological criteria for re-introduction success. We believe the Service must reasonably explain how the inclusion of the following sites could possibly aid in or ensure conservation of the species, or must exclude them from the critical habitat designation:

- **Saddlebag Lake, Ellery Lake, Tioga Lake, and Lee Vining Creek** between these lakes (Subunit 2M),
- **Gem Lake, Waugh Lake, and Rush Creek** between these lakes (Subunit 3B).
- In Inyo County, **Rock Creek Lake and Rock Creek** downstream from the lake (Subunit 3D).

All of these areas are frogless, front-country (or nearly so), large lakes with self-sustaining and heavily-used fisheries. All are accessible by paved roads or occur along major trails within easy travel distance for anglers. Long-standing dams are operated (at Saddlebag, Ellery, Tioga, Gem, and Waugh Lakes) further impacting habitat functionality. All attract high annual site visits according to the United States Department of Agriculture (USDA) Forest Service National Visitor Use Monitoring Results (Round 2, 2005-2009), Version 2.1.2.37, as follows:

- **16,556 estimated annual site visits** to Subunit 2M based on use at Ellery Lake campground, Saddlebag Lake campground, Tioga Lake campground, and Tioga Pass Resort (USDA Forest Service, Proxy Results by Site).
- **3,372 estimated annual site visits** to Subunit 3B derived by combining visitation data for Oh! Ridge campground, June Lake campground, Gull Lake campground, Reversed Creek campground, Silver Lake campground, Silver Lake Resort RV Park, Boulder Lodge, and Silver Lake Resort Cabins for a total of 112,416 (USDA Forest Service, Proxy Results by Site), and then multiplying by the 3% of visitors estimated to use wilderness areas such as those of concern in this subunit (USDA Forest Service, Annual Visitation Estimate). Therefore, 112,416 site visits x 3% = 3,372 estimated site visits.
- **152,593 estimated annual site visits** to Subunit 3D based on use at Mosquito Flat campground, Rock Creek Lake campground, Pine Grove campground, Tuff Campground, East Fork campground, Palisade campground, Iris Meadow campground, French Camp campground, Big Meadow campground, Rock Creek Lake

Group campground, Palisade/Clyde Group campground, Rock Creek Lakes Resort, and Tom's Place (USDA Forest Service, Proxy Results by Site).

Additionally, two areas with self-sustaining and heavily-used fisheries, easy access and high-volume use, and no extant populations appear to be incompatible with critical habitat in designated wilderness of Mono County. Again, deference has been given to CDFW's work and locations identified as viable recovery sites are not included in our exclusion request. We believe the Service must reasonably explain how the inclusion of the following sites could possibly aid in or ensure conservation of the species, or must exclude these areas from Sierra Nevada yellow-legged frog critical habitat designation:

- **Twenty Lakes Basin**, including the basin lakes of Greenstone, Cascade, Steelhead, Helen, Shamrock, Odell, Hummingbird, Z, and associated unnamed ponds **(**Subunit 2M), and
- **Little Lakes Basin** (Inyo County) which has large, highly connected water bodies including Chickenfoot Lake, Ruby Lake, Mills Lake, Heart Lake, Box Lake, Long Lake, Eastern Brook Lakes (which are *Bd* positive and recent reintroduction efforts have been unsuccessful), and the creeks between these lakes. **(**Subunit 3D).

Site visitation calculations, using the total estimated potential annual site visits calculated above for the subunits multiplied by the 3% visitation rate to wilderness areas (USDA Forest Service, Annual Visitation Estimate), results in just under 500 site visits to the relatively small area of Subunit 2M. Data collected by the Inyo National Forest indicates that 16,489 day users visited the Little Lakes Basin during 2009 (Mono County, 2011). These visitors are continuing an historic pattern of use that annually contributes significantly to the economic engine of tourism in Mono County.

Statements have been made that critical habitat is intended to identify areas at a relatively coarse scale, that not every area within a critical habitat is essential for species survival but the general area is, and that included developed areas would not be managed as critical habitat despite being designated so. Mono County's contention is that when evidence is available, critical habitat can and should be identified at a finer spatial scale than the law requires. Such utilization of the most specific and detailed data available is also consistent with the mandate to determine the final rule based upon the "best available science." For developed areas, no harm would result from excluding them if they are not intended to be managed as critical habitat. Lastly, all of these areas are located on the periphery of the critical habitat designation and therefore not necessary to connectivity, and exclusion would not affect the larger area that may be critical to species survival and recovery.

In addition, the Service's proposals lack scientific evidence as a basis for any conclusion that recreation should be considered a threat to the Sierra Nevada yellow-legged frog. We therefore request recreation be removed from the list of current threats.

Yosemite Toad

We concur that Yosemite toad decline is a long-term result of an historic legacy of unregulated, destructive use of montane meadows. The critical tadpole requirement for warm pools, which prior to these uses was sustained by functional meadow water storage and perching of groundwater, is maladaptive to the rapid flow-through hydrologic regime that now operates within large portions of the Yosemite toad historic range. The climate change model cited in the proposal is apparently not peer-reviewed; however, it would appear reasonable to assume that global warming will exacerbate the toad's dilemma (Viers et al. 2013). As we cannot turn back the clock or avoid climate change, we conclude the damage is done. The point is made explicitly in order to contrast with the proposal's unfounded extrapolation of these legacy effects to modern livestock rotation and stocking practices under the management of the U.S. Forest Service (USFS). It is not proven, as described below, that current regulated grazing is a significant threat deserving of additional regulation under the ESA. We offer this point and supporting best available scientific documentation because it is important that the actual threat – the historic damage already done – be identified correctly so the appropriate remediation can be called for in the Service's final analysis. Meadow hydrology restoration methods with proven efficacy to mitigate the legacy of meadow damage should replace additional, speculative regulation of modern grazing practices.

Current research demonstrates that restoration of critical wetland hydrology can be accomplished regardless of the presence or absence of grazing as currently practiced. Published research has specifically disproven the negative relationship that is hypothesized within the Yosemite toad proposed rules. Culpable ongoing degradation of toad habitat, for example breeding and larval pool eutrophication or food web disruption, would have been observed where grazing is now being allowed, or direct impacts of trampling and removal of the vegetation upon which toads rely for cover would have been documented. However, these relationships and effects have not been found. No differences in breeding pool water amount or quality were found during multi-year comparisons between currently grazed and ungrazed meadow systems (Roche et al. 2013a). Monitoring of meadows within the Inyo National Forest (37 sites) found no comparative differences in plant species diversity/richness, soil stability, or meadow habitat suitability for Yosemite toad after 10 years of either livestock grazing or exclusion (Roche et al. 2013b). If practices of modern livestock grazing on federal lands were contributing to the current Yosemite toad decline, then this focused research of the last decade would have detected some correlation between livestock presence and local toad population loss. Finally, the Service should consider the full wealth of data collected by the U.S. Forest Service's Sierra Nevada Amphibian Monitoring Program, rather than merely citing census numbers in the proposed rules. For example, their survey of 134 Yosemite Toad meadow habitats has documented a significant *positive* relationship between managed grazing of meadows and persistence of toad populations (Brown et al. 2012, 2013). In Mono County, positive trends indicating the compatibility of livestock grazing using modern practices have been documented by CDFW (2013b), including the long-term persistence of toad populations within permitted grazing allotments in the Sonora Pass area (proposed Critical Habitat Unit 2).

Threats referenced in the draft listing and critical habitat proposals for Yosemite toad appear to have been hypothesized when the collapse was being documented in the 1990's (e.g., Drost and Fellers 1996). More recent research supports the current hypothesis that there is a temporal and spatial separation of grazing from habitat that meets critical toad life history requirements (Roche et al. 2012). The Humboldt-Toiyabe National Forest administers the timing and intensity of permitted grazing with specific regard to separating allotment use from the toad breeding season (see active dates on allotments identified in emails from Aaron Coogan and Rixey Jenkins, pers. comm. 9/20/13). Specific and adequate regulatory standards to protect Yosemite toad habitat are included in their annual grazing permits (see the 1999 sample permit). Management that is sensitive to ensuring compatibility explains why recent data have not substantiated the Service's contention that current grazing practices are a threat. We trust the Service will more carefully distinguish legacy effects and current practices in their final rules, and thereby recognize that hope for the toad lies in restoration of meadow hydrology, the true threat which should be elevated in priority.

We noted that the analyses in the draft proposal were hampered by the relative dearth of available primary research to date regarding the identified (potential) threats of pack stock and other recreational uses of meadows. These uses are similar to grazing in that the effects from historical uses have apparently been confused with the effects of current uses. There also exists the similarity that management today specifically works to avoid the types of impacts to Yosemite toad meadow habitat that occurred historically. Under the modern Annual Operating Plan management administered by the Inyo National Forest (2013), pack stock are allowed to use relatively drier meadows, and only after the Yosemite toad breeding season has ended. The Forest has moved damaging trail routes to uplands outside the available habitat at known toad locations such as McGee Creek, Saddlebag Lake and Gem Lake, and is implementing a number of additional trail relocation projects to protect meadow hydrology in Mono County (Jon Regelbrugge, pers. comm. 8/28/13). Trail re-location will prevent further undercutting of the meadow water table. Trail location, therefore, should be identified as a specific legacy effect that can be addressed, as opposed to the draft proposal's repetitive, vague, and scientifically unsupported conclusion that "recreational activities" are somehow a threat. While much-used within the proposed rules, "recreational activities" is not adequately defined in terms of specific impacts and the implied inclusion of hiking, backpacking, and other similar activities is not helpful in ensuring species recovery. We constructively suggest that legacy effects must be more carefully separated from current pack stock and recreation uses in the revised threat analysis for the Yosemite toad as well as the yellow-legged frog. A more thorough analysis that includes historical unawareness of how trail location impacts local water table function will highlight repairing meadow habitat hydrology once again as a mechanism for bringing about species recovery. Widespread, permanent restoration of the water table, shallow seasonal ponding, and dense phreatophytic plant cover over entire meadow extents will surely benefit this species far more than will any attempt to further restrict the relatively concentrated effects of pack stock and recreational use where it occurs today.

As a simple illustration of the prioritization that meadow restoration warrants for any realistic plan to recover Yosemite toad, consider the benefits of a meadow hydrology restoration

project. Rocks placed carefully would effectively and permanently solve the overly rapid drainage that has been created by historic use. In every case, large habitat *areas* will be restored by treating hydrologic nick *points*. Critical habitat - denser and more diverse meadow swards, and embedded warm water pools during the Yosemite toad breeding period - is provided because conditions of normally sustained shallow groundwater is restored meadow-wide. This reasoning also applies to Sierra Nevada yellow-legged frog, as returning a lacustrine meadow system to its normally more mediated rate of meltwater transmission results annually in a condition of deeper water at the critical late-season time when freezing becomes a limit upon tadpole survival. Re-focusing priority to repairing historic hydrologic nicks will rapidly bring about area-wide habitat benefits. Identifying this precise mechanism as a target for ongoing maintenance work, rather than imprecise, generalized notions about further restrictions on recreation and current permitted uses, would provide a more appropriate basis for the pending Recovery Plan. For any meadow habitat, use of rocks to raise the water table meadow-wide would be compatible with the uses that currently support recreation and tourism, the primary sector of the local economy. As in the past, we expect access and use patterns to simply adapt to the new (in this case restored) condition, as neither humans nor livestock prefer to occupy meadow areas that are muddy, marshy and boggy.

Economic Impacts

While the Service has stated recreation use is not considered a significant threat to the Sierra Nevada yellow-legged frog and Yosemite toad, the proposals also cite recreation as being "incompatible" with recovery. Therefore, we are compelled to address the certain economic impacts to recreation that will arise from this designation, as it is the top economic sector in Mono County. The analysis is conducted at a coarse scale and predicated upon a "worst-case scenario" to demonstrate the potential scale of impacts. Disclosure of anticipated management mechanisms and/or more detailed data would assist with a more constrained analysis.

According to the USDA Forest Service National Visitor Use Monitoring Program, Version 2.1.2.37, the total annual spending associated with non-local visitors to the Inyo National Forest, which covers both Inyo and Mono counties, exceeds $265.8 million annually (USDA Forest Service, Annual Total Spending by Market Segment), excluding visits for downhill skiing. Of those non-local visitors, approximately 47.2% responded that hiking, walking or backpacking was their main reason for visiting and 17.5% cited fishing (USDA Forest Service, Activity Participation), while 90% cited recreation as their main purpose for visiting (USDA Purpose of Visit by Visitors Who Agreed to be Interviewed). Mono County's visitation numbers indicate 1,289,000 visitors in the spring/summer/fall spending $223 million (Lauren Schalu Consulting, 2009). Of these visitors, 38.7% participated in fishing, and 47% participated in hiking.

If all the visitors participating in fishing were to vacation elsewhere due to new restrictions, the economic analysis demonstrates visitor spending could be reduced by $87 million in Mono County ($223 million x 38.7%). If restrictions on hiking activities are also imposed and those visitors choose to go elsewhere, the economic impact in Mono County could be $104.8 million ($223 million x 47%) for a total up to $189.6 million for fishing and hiking combined. The

economic impact to recreation purposes in general on the Inyo National Forest, if all 90% of non-local visitors were to choose another destination, could be as high as $239.2 million annually.

Elimination of grazing and pack stock use within the critical habitat as proposed would result in economic impacts in Mono County exceeding $450,000 annually up to $13.7 million over 20 years for grazing (Nathan Reade, pers. comm. 9/26/13) based on allotment data received from the Humboldt-Toiyabe National Forest (Aaron Coogan and Rixey Jenkins, pers. comm. 9/20/13). Pack stock impacts are calculated at just over $1.8 million annually up to $36.5 million over 20 years (Ethan James, pers. comm. 10/15/13) based on data received from the Humboldt-Toiyabe National Forest (Marnie Bonesteel, per. comm. 9/25/13) and the Inyo National Forest (Carmen John, pers. comm. 10/1/13).

Finally, according to the Mammoth Community Water District (Irene Yamashita, pers. comm. 10/7/13), the potential elimination of the dam at Lake Mary is a significant threat to the future of the Town of Mammoth Lakes, valued at $4 billion based on assessed property values. If the dam were removed for habitat restoration, the sole source of surface water for the Town would be lost and could not be sufficiently replaced with groundwater supplies. The District would not be able to supply adequate water for the existing population, let alone the build-out identified in the Town's General Plan.

These impacts are significant and clearly cannot be absorbed by our relatively inelastic local, rural economy. We calculate that excluding those water basins identified above from critical habitat designation for the Sierra Nevada yellow-legged frog in Subunits 2M, 3B and 3D could restore to Mono County an economic benefit of $87 million to $190 million annually, depending on the level of restrictions that are imposed. Downgrading livestock grazing and pack stock use to "not a listing factor" (as adequate regulatory mechanisms now exist) for both the Sierra Nevada yellow-legged frog and Yosemite toad could provide a minimum benefit of $2.25 million annually or $41.5 million over 20 years. More carefully defining general recreation impacts to separate historical or legacy effects from current uses for both the Sierra Nevada yellow-legged frog and Yosemite toad could provide a benefit up to $239.2 million annually across the Inyo National Forest. Finally, the exclusion of Lake Mary from the Yosemite toad critical habitat designation could protect the domestic water supply necessary to the Town of Mammoth Lakes, and protect assessed private property values. Balanced use of the best available science, including the research publications described above and attached herein, in light of the reasonably expected economic effects of designation, allows only one conclusion: The devastating, certain economic impacts proposed for Mono County clearly outweigh any conceivable biological benefits from including those areas of Mono County listed in this comment, or from including inadequately defined and unsupported "threats" such as permitted grazing, pack stock use, and recreation.

Lastly, when these impacts are cumulatively considered with the potential impacts of the recently released listing of and critical habitat designation for the Distinct Population Segment of the Bi-State sage grouse, 82% of private properties in the County may be severely affected. Limitations on the development of such a large percentage of private properties in the County

coupled with major impacts to the two biggest economic sectors – tourism and agriculture – is an unthinkable "double whammy" for a small, rural county like ours to absorb (see map of proposed critical habitat in Mono County in Exhibit A).

Conclusion

Our concern at this point is to ensure critical habitat and the threats to the Sierra Nevada yellow-legged frog and Yosemite toad are correctly identified now to stop the precipitous decline of these species and support their eventual recovery while also minimizing impacts to the rural economy and communities of Mono County. For the Sierra Nevada yellow-legged frog, the historic range of the species is not the correct basis for designation of critical habitat. We are requesting that the Service exclude those locations we identified in Subunits 2M, 3B and 3D where re-colonization is currently intractable due to trout and fungus. Additionally, we request recreation be downgraded to "not a listing factor" due to lack of data. For the Yosemite toad, we request the Service correctly identify the actual threat of historic meadow damage; downgrade livestock grazing and pack stock use under current USFS management, as well as recreation, to "not a listing factor;" and focus on meadow hydrology restoration methods with proven efficacy to repair historic meadow damage. Excluding critical habitat areas and downgrading threats as requested would not result in extinction based on the included scientific data demonstrating no biological benefit to the species, and avoids economic losses of up to $191.9 million annually in Mono County alone.

Thank you for taking the time to consider the additional scientific information we have presented and the position the data have led us to take. We appreciate the challenging political, environmental and social position of the Service, and hope that our analysis will assist the Service with identifying the true threats to the amphibians and modifying the critical habitat designation to reflect local habitats in Mono County best suited for successful preservation and recovery of these species.

Respectfully,

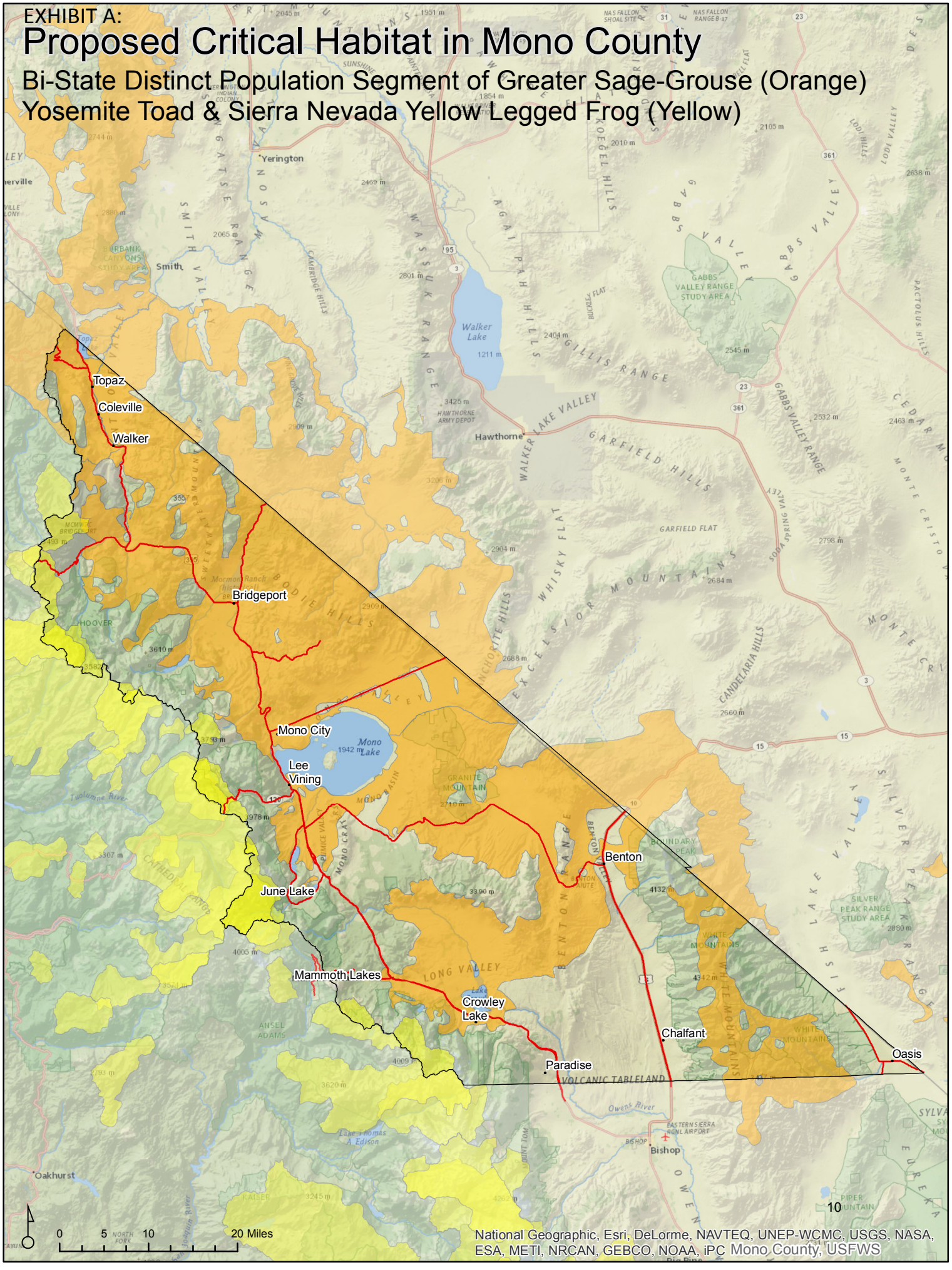
Byng Hunt
Chair

CC: Congressman Paul Cook
Senator Dianne Feinstein
Senator Barbara Boxer
Rural County Representatives of California (RCRC)
California State Association of Counties (CSAC)
Town of Mammoth Lakes
County of Inyo
County of Alpine

EXHIBIT A:

Proposed Critical Habitat in Mono County

Bi-State Distinct Population Segment of Greater Sage-Grouse (Orange)
Yosemite Toad & Sierra Nevada Yellow Legged Frog (Yellow)



Personal Communications

Aaron. C. Coogan and Rixey Jenkins, U.S.D.A. Forest Service, Humboldt-Toiyabe National Forest Bridgeport Ranger District, Rangeland Management Specialists, Bridgeport. Emails last dated September 20, 2013.

Carmen John, U.S.D.A. Forest Service, Inyo National Forest, White Mountain and Mt. Whitney Ranger Districts, Recreation Special Uses, Bishop. Emails last dated October 1, 2013.

Ethan James, Mono County Community Development Department, Mammoth Lakes. Emails last dated October 15, 2013.

Irene Yamashita, Mammoth Community Water District, Public Affairs/Environmental Specialist, Mammoth Lakes. Email dated October 7, 2013.

James Erdman, Jr., California Department of Fish and Game biologist, High Mountain Lakes Project, Bishop. Interview in person and data review on August 27, 2013.

Jon Regelbrugge, U.S.D.A. Forest Service, Inyo National Forest, District Ranger for the Mammoth Lakes and Mono Ranger Districts, Mammoth Lakes. Interview in person on August 28, 2013.

Marnie Bonesteel, U.S.D.A. Forest Service, Humboldt-Toiyabe National Forest, Natural Resource Specialist (special uses), Sparks, NV. Email dated September 20, 2013.

Nathan Reade, Inyo Mono Agricultural Commissioner, Bishop. Email dated September 26, 2013.

References

Brown, C, Kiehl, K, and L Wilkinson, 2012. Advantages of long-term, multi-scale monitoring: Assessing the current status of the Yosemite toad (*Anaxyrus* [*Bufo*] *canorus*) in the Sierra Nevada, California, USA. Herpetological Conservation and Biology 7:115-131.

Brown, C, Kiehl, K, Wilkinson, L, and AJ Lind, 2013. Sierra Nevada Amphibian Monitoring Program (2002-2009): Results for the mountain yellow-legged from, Yosemite toad, and Sierran treefrog. Draft technical report, USDA Forest Service Pacific Southwest Research Station, Albany, California.

California Department of Fish and Wildlife, 2013a. High Mountain Lakes Project, RASI unpublished data (2003-2013). CDFW Bishop. As the CDFW has not released this data to the general public, the USFWS can obtain the information by contacting the Bishop office at 760.872.1171.

California Department of Fish and Wildlife, 2013b. High Mountain Lakes Project, BUCA unpublished data (2003-2013). CDFW Bishop. As the CDFW has not released this data to the general public, the USFWS can obtain the information by contacting the Bishop office at 760.872.1171.

Fellers, GM, Kleeman, PM, Miller, DAW, Halstead, B, and WA Link, 2013. Population size, growth, and movements of *Rana sierrae*. Herpetologica 69:147-162.

Lauren Schalu Consulting, 2009. The Economic & Fiscal Impacts and Visitor Profile of Mono County Tourism in 2008. Mono County Department of Economic Development & Special Projects, Mammoth Lakes.

Mono County, 2011. California Forest Highway Application for Rock Creek Road. Mono County Public Works Department, Bridgeport. P. 10.

Roche, LM, Latimer, AM, Eastburn, DJ, and KW Tate, 2012. Cattle grazing and conservation of a meadow-dependent amphibian species in the Sierra Nevada. PLos One 7(4):e35734.

Roche, LM, Kromschroeder, L, Atwill, ER, Dahlgren, RA, and KW Tate, 2013a. Water quality conditions associated with cattle grazing and conservation and recreation on national forest lands. PLos One 8:e68127.

Roche, LM, Frietas, M, Weixelman, D, Lile, D, Oles, K, Jackson, A, and A Yost, 2013b. Meadow Conditions on National Forest Grazing Allotments: First findings – The influences of changing precipitation and grazing management on Sierra Nevada mountain meadow plant community attributes and function. www.plantsciences.ucdavis.edu/plantsciences_faculty/tate/main/projects/sierra_nevada_meadows_inyo.html, U.C. Davis Rangeland Watershed Laboratory.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. Activity Participation. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/VD04?filename=Activities.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. Annual Total Spending by Market Segment. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/E05?filename=Total_Spending_by_Segment.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. Annual Visitation Estimate. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/VE01?filename=Visitation.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. National Visitor Use Monitoring Results Cover Sheet. Retrieved November 6, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/Content/ResultsCoverSheet.pdf.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. Proxy Results by Site. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/IDF02?filename=Proxy_Summary.

United States Department of Agriculture (USDA) Forest Service, Round 2, 2005-2009. Purpose of Visit by Visitors Who Agreed to be Interviewed. In National Visitor Use Monitoring Results Version 2.1.2.37. Retrieved October 15, 2013, from http://apps.fs.usda.gov/nrm/nvum/results/A05004.aspx/Round2/SP04?filename=Purpose_of_Visit.

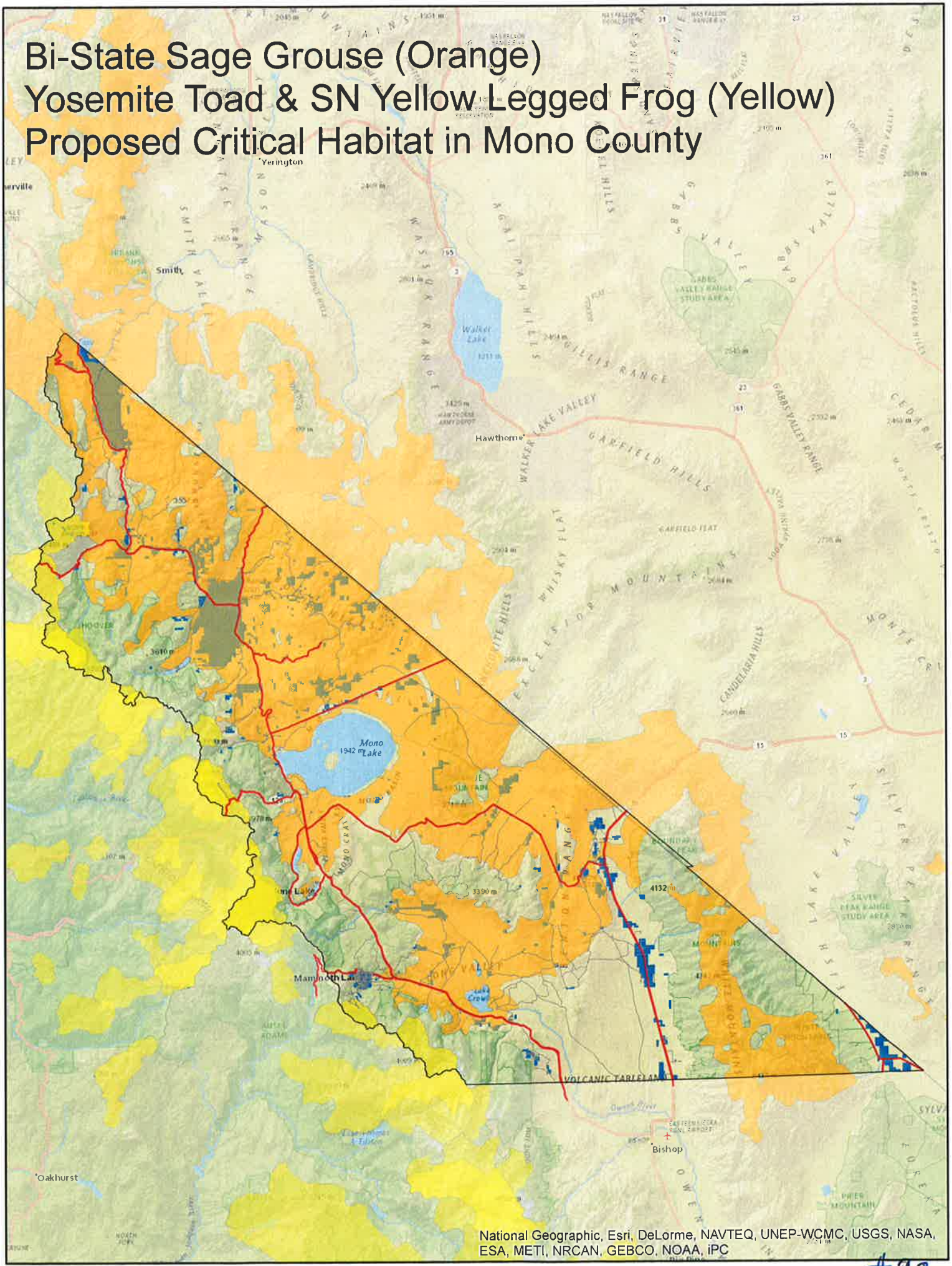
United States Department of Agriculture (USDA) Forest Service, Inyo National Forest, 2013. Appendix BB, 2013 Annual Operating Plan. Received from: Carmen John, White Mountain and Mt. Whitney Ranger Districts, Recreation Special Uses, Bishop.

United States Department of Agriculture (USDA) Forest Service, Toiyabe National Forest, 1999. Sample Grazing Permit – Part 3 (Reference FSM 2230). Received from: Rixey Jenkins, Bridgeport Ranger District, Range Management Specialist, Bridgeport.

Viers, JH, Purdy, SE, Peek, RA, Fryjoff-Hung, A, Santos, NR, Katz, JV, Emmons, JD, Dolan, DV, and SM Yarnell, 2013. Montane meadows in the Sierra Nevada: Changing hydroclimatic conditions and concepts for vulnerability assessment. Center for Watersheds Technical Report, U.C. Davis.

Vredenburg, VT, Knapp, RA, Tunstall, TS, and CJ Briggs, 2010. Dynamics of an emerging disease drive large-scale amphibian population extinctions. Proc. Nat. Acad. Sci. 107:9689-9694.

Bi-State Sage Grouse (Orange)
Yosemite Toad & SN Yellow Legged Frog (Yellow)
Proposed Critical Habitat in Mono County



#9e

November 5, 2013
Regular Meeting
Item #13b

Finance

Community Grant Application Process

CONTRIBUTIONS TO OTHER ORGANIZATIONS

Organization	FY 2009-10 Actual	FY 2010-11 Actual	FY 2011-12 Actual	FY 2012-13 Approved	FY 2013-14 Requested	FY 2013-14 Approved
Mammoth AYSO		2,995	2,700	3,000		
ML Swim Team		3,000	3,000	3,000		
Mono County Little League		3,600	3,600	3,000		
Ombudsman Advocacy Services	2,000	2,000	2,000			
UC 4H Science Camp		1,800	500	500		
June Lake Loop Historical Society		9,450				
Mono Basin Historical Society	5,000	5,000	5,000	5,000		
Southern Mono Historical Society			5,000	5,000		
Chamber Music Unbound	10,000	10,000	8,000	8,000		
Mono Council for the Arts	20,000	20,000	13,000	11,000		
Jazz Jubilee Festival	15,000	20,000	13,350	10,000		
June Lake Loop Music Festival				5,000		
ML Sierra Summer Festival	10,000	10,000	6,350	5,000		
Antelope Valley CERT				0		
Forest Service (E. S. Avalanche Center)				2,500		
Friends of the Inyo (Trails Management)	10,000	10,000	5,000	5,000	8,840	
Interagency Visitors Center	5,000	Tourism Commission	Tourism Commission	Tourism Commission	Tourism Commission	Tourism Commission
ML Trails and Public Access	15,000		5,000	5,000		
Mammoth Nordic				5,000		
Sierra Bounty Produce Collective				2,000		
Yosemite Gateway Partners		5,000	2,000	2,000		
TOTAL	$92,000	$102,845	$74,500	$80,000	$8,840	$0

#136