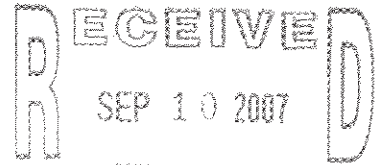


APPENDIX A

BRACKETED COMMENT LETTERS ON THE DRAFT EIR

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



September 5, 2007

TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

Ms. Jen Daugherty

TOWN OF MAMMOTH LAKES COMMUNITY DEVELOPMENT DEPARTMENT

P.O. Box 1609

Mammoth Lakes, CA 93546

Re: SCH#2006112015: CEQA Notice of Completion: draft Environmental Impact Report (DEIR) for Snowcreek VIII, Snowcreek Master Plan Update – 2007: Town of Mammoth Lakes, Mono County, California

Dear Ms. Daugherty:

The Native American Heritage Commission (NAHC) is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). Because of the number of 'known' Native American cultural resources identified at this project site or 'area of potential effect (APE)' and the concerns expressed to the NAHC by local tribes, we strongly recommend the employment of Native American Monitors during any ground-disturbing activity at this site. This would be in addition to a qualified archaeologist.

In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission understands that your archaeologist and environmental firm has already contacted the California Resources Information System (CHRIS) and the Native American Heritage Commission to determine the existence of archaeological and cultural resources at the site.

- The NAHC advises the use of Native American Monitors, as recommended above, to ensure proper identification and care given cultural resources that may be discovered. Also, the NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

✓ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

✓ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

✓ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

A1

A1-1

A1-2

A1-3

A1-4

A1-5

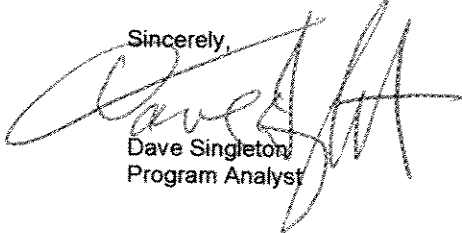
A1-6

A1-7

A1-8

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", written over the printed name and title.

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Native American Contacts

Mono County
September 5, 2007

Benton Paiute Reservation
Joseph C. Saulque, Chairperson
Star Route 4, Box 56-A Paiute
Benton , CA 93512
numic@gnet.com
(760) 933-2321
(760)933-2412

Mono Lake Indian Community
Charlotte Lange, Chairperson
P.O. Box 117 Mono
Big Pine , CA 93513 Northern Paiute
(760) 938-1190

Big Pine Band of Owens Valley
David Moose, Chairperson
P. O. Box 700 Owens Valley Paiute
Big Pine , CA 93513
bigpinetribaladmin@earthlink.
(760) 938-2003
(760) 938-2942-FAX

Big Pine Band of Owens Valley THPO
Bill Helmer, Tribal Historic Preservation Officer
P.O. Box 700 Paiute
Big Pine , CA 93513
amargosa@aol.com
(760) 938-2003
(760) 938-2942 fax

Bridgeport Paiute Indian Colony
Charlotte Baker, Chairperson
P.O. Box 37 Paiute
Bridgeport , CA 93517
bicgovadm@yahoo.com
(760) 932-7083
(760) 932-7846 Fax

Bishop Paiute Tribe THPO
Theresa Stone-Yanez, Tribal Historic Preservation
50 Tu Su Lane Paiute-Shoshone
Bishop , CA 93514
(760) 873-3584, Ext 250
(760) 873-4143 - FAX

Antelope Valley Paiute Tribe
Bill Lovett, Chairperson
874 Camp Antelope Road, #11 Washoe / Paiute
Coleville , CA 96107
(530) 495-2801
(530) 495-2736

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2006112015; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for Snowcreek VIII Master Plan Update - 2007; Town of Mammoth Lakes; Mono County, California.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

Memorandum

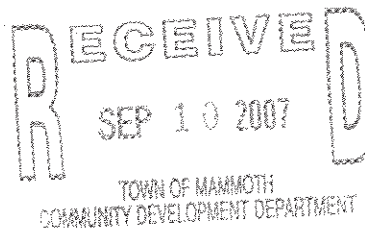
A2

Date: September 5, 2007
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH #2006112015
Snowcreek VIII, Snowcreek Master Plan Update -2007

The Lead Agency has extended the review period for the above referenced project to October 22, 2007 to accommodate the review process. All other project information remains the same.

A2-1

cc: Jen Daugherty
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546





COMMUNITY DEVELOPMENT
P.O. Box 1609, Mammoth Lakes, CA 93546
(760) 934-8989 ext. 260
fax (760) 934-8608

August 31, 2007

State Clearinghouse
1400 Tenth Street, Suite 222
Sacramento, CA 95814

Re: Public comment period date change for the Snowcreek VIII, Snowcreek Master Plan Update – 2007 Project Draft Environmental Impact Report (SCH #: 2006112015)

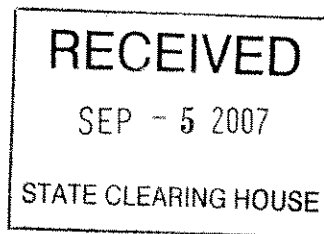
Dear State Clearinghouse,

A Notice of Completion for a Draft Environmental Impact Report (DEIR) was sent to your above listed address for the Snowcreek VIII, Snowcreek Master Plan Update – 2007 Project Draft Environmental Impact Report (SCH #: 2006112015). The Notice of Completion identified the DEIR public review period as August 30, 2007 to October 15, 2007. Unfortunately, the public notice sent to the newspaper was not inserted in the August 30, 2007 edition. Therefore, we are revising the Snowcreek VIII, Snowcreek Master Plan Update – 2007 Project Draft Environmental Impact Report (SCH #: 2006112015) public review period to September 6, 2007 to October 22, 2007. Please revise your dates accordingly.

Please do not hesitate to contact me with any questions or additional information requests.

Respectfully,

Jen Daugherty
Assistant Planner
jdaugherty@ci.mammoth-lakes.ca.us



cc. Rob Carnachan, Christopher A. Joseph and Associates
Bill Taylor, Deputy Community Development Director, Town of Mammoth Lakes

Form A

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2006112015

Project Title: Snowcreek VIII, Snowcreek Master Plan Update - 2007 previously titled the 2006 Revised Snowcreek Master Plan

Lead Agency: Town of Mammoth Lakes

Contact Person: Jen Daugherty

Mailing Address: P. O. Box 1609

Phone: (760) 934-8989 x260

City: Mammoth Lakes

Zip: 93546

County: Mono

Project Location:

County: Mono

City/Nearest Community: Mammoth Lakes

Total Acres: ~260

Cross Streets: Old Mammoth Road, Minaret Road/Fairway Drive

Zip Code: 93546

Assessor's Parcel No. 46-048-26; 46-076-10, 11, 12, 13, 23; 46-146-04, 05

Section: 34

Twp: 3S

Range: 27E

Base: South

Within 2 Miles

State Hwy #: 895

Waterways: Mammoth Creek

Airports: Mammoth Yosemite Airport

Railways:

Schools: Mammoth Unified School District

Document Type:

- CEQA ☐ NOP
☐ Early Cons
☐ Neg Dec
☐ Mit Neg Dec

- ☒ Draft EIR
☐ Supplement to EIR (Note prior SCH # below)
☐ Subsequent EIR (Note prior SCH # below)
☐ Other

NEPA ☐ NOI☐ EAOther: ☐ Joint Document☐ Final Document☐ Other

RECEIVED

AUG 30 2007

Local Action Type:

- ☐ General Plan Update
☒ General Plan Amendment
☐ General Plan Element
☐ Community Plan

- ☐ Specific Plan
☒ Master Plan
☐ Planned Unit Development
☐ Site Plan

- ☐ Rezone
☐ Project
☐ Use Permit
☐ Land Division (Subdivision, etc.)

- ☐ Annexation
☐ Redevelopment
☐ Coastal Permit
☒ Other Zone Code Amendment

Development Type:

- ☒ Residential: Units 1,050* Acres
☐ Office: Sq. ft. Acres Employees
☒ Commercial: Sq. ft. 75,000 Acres Employees
☐ Industrial: Sq. ft. Acres Employees
☐ Educational
☒ Recreational: golf club, golf course & attendant facilities, Outfitter's Cabin

- ☐ Water Facilities: Type MGD
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type MW
☐ Waste Treatment: Type MGD
☐ Hazardous Waste: Type
☐ Other

Project Issues Discussed in Document:

- ☒ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☒ Archeological/Historical
☒ Biological Resources
☐ Coastal Zone
☐ Drainage/Absorption
☐ Economic/Jobs
☐ Fiscal
☒ Flood Plain/Flooding
☒ Forest Land/Fire Hazard
☒ Geologic/Seismic
☐ Minerals
☐ Noise
☒ Population/Housing Balance
☒ Public Services/Facilities
☒ Recreation/Parks
☐ Schools/Universities
☐ Septic Systems
☐ Sewer Capacity
☒ Soil Erosion/Compaction/Grading
☐ Solid Waste
☒ Toxic/Hazardous
☒ Traffic/Circulation
☒ Vegetation
☒ Water Quality
☒ Water Supply/Groundwater
☒ Wetland/Riparian
☒ Growth Inducement
☒ Land Use
☒ Cumulative Effects
☐ Other

Present Land Use/Zoning/General Plan Designation:

Zoning- Resort (Snowcreek Master Plan) and Open Space: GP Designation- Resort, Open Space

Project Description: (please use a separate page if necessary)

The Project consists of adoption by the Town of the 2007 Snowcreek Master Plan to update the existing Snowcreek Master Plan and address proposed buildout of the Snowcreek Master Plan area (development that is also referred to as "Snowcreek VIII"). The Snowcreek VIII or Project is intended to fulfill the vision of the previously approved Snowcreek Master Plans and the Project EIR will update the Town's 1974 and 1981 EIRs for the previous iterations of the Snowcreek Master Plan. The Project has been designed to integrate residential, resort, recreation, retail, and public amenities components.

*The 1,050 units are in addition to those units that are already constructed or have been previously approved.

State Clearinghouse Contact:

(916) 445-0613

State Review Began:

8-30-2007

SCH COMPLIANCE

10-22-2007

Please note State Clearinghouse Number (SCH#) on all Comments

2006112015

SCH#:

Please forward late comments directly to the Lead Agency

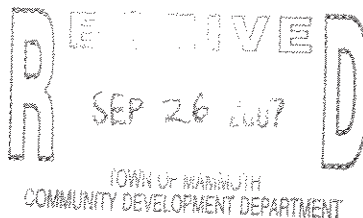
AQMD/APCD 9

(Resources: 9/1)

Project Sent to the following State Agencies

- ☒ Resources
☐ Boating & Waterways
☐ Coastal Comm
☐ Colorado Rvr Bd
☒ Conservation
☒ Fish & Game # 6 IM
☐ Delta Protection Comm
☒ Cal Fire
☒ Historic Preservation
☒ Parks & Rec
☐ Reclamation Board
☐ Bay Cons & Dev Comm
☒ DWR
☐ OES (Emergency Svcs)
☒ Bus Transp Hous
☒ Aeronautics
☒ CHP
☒ Caltrans # 9
☐ Trans Planning
☒ Housing & Com Dev
☐ Food & Agriculture
☐ Health Services
☐ State/Consumer Svcs
☐ General Services
☐ Cal EPA
☐ ARB - Airport Projects
☐ ARB - Transportation Projects
☐ ARB - Major Industrial Projects
☐ Integrated Waste Mgmt Bd
☐ SWRCB: Clean Wtr Prog
☐ SWRCB: Wtr Quality
☐ SWRCB: Wtr Rights
☒ Reg. WQCB # bV
☒ Toxic Sub Ctrl-CTC
☐ Yth/Adlt Corrections
☐ Corrections
☐ Independent Comm
☐ Energy Commission
☒ NAHC
☐ Public Utilities Comm
☐ State Lands Comm
☐ Tahoe Rgl Plan Agency
☐ Conservancy

Mammoth Community Water District
P.O. Box 597
Mammoth Lakes, CA 93546
(760) 934-2596



September 21, 2007

A3

Town of Mammoth Lakes, Community Development Department
Attn: Jen Daugherty
P.O. Box 1609
Mammoth Lakes, CA 93546

RE: Notice of availability of a Draft Environmental Impact Report for Snowcreek VIII, Snowcreek Master Plan Update 2007

Dear Ms. Daugherty,

The District has reviewed the Draft Environmental Impact Report for Snowcreek VIII, the 2007 Snowcreek Master Plan Update. We appreciate the opportunity to comment on the contents of the Draft EIR.

A3-1

1. Within the Project Description chapter on page III-2 and Table III-1 on page III-3, there is a minor mistake describing the District's facilities within the Snowcreek development areas. The District's groundwater treatment plant #1 is located within the development area, not the wastewater treatment plant. This facility is located on the District's property at the corner of Meridian Boulevard and Highway 203 at the eastern extremity of Town.
2. In the Project Description chapter on page III-19, the second to last sentence under Image and Character states that the use of recycled water on Snowcreek Golf Course "could result in the availability of untreated groundwater that could be treated and used to meet other project or future needs of the Town." This statement also occurs in the Land Use and Planning chapter on page IV.H-21 at the end of the LRWQCB section. The only offset of existing demands that would result from the use of recycled water would occur on the existing nine holes since the District supplements supplies from an existing Snowcreek owned well during the summer irrigation season. The use of recycled water on the new nine holes, while beneficial to the

A3-2

A3-3

community and all users of Mammoth Basin water supplies would not result in an offset of potable water since this is a new source of water demand within the Basin.

A3-3
(cont'd)

3. In the Cultural Resources chapter on page IV.E-5, the document states that the District purchased water rights to Bodle Ditch in the 1980s, which should be clarified. In 1977, the District entered into an agreement with the Arcularius Ranch, which had the effect of transferring all riparian and overlying water rights from Arcularius to the District. It is unclear as to whether or not Arcularius had any water rights to Bodle Ditch that were transferred to the District. Currently, the District operates a diversion from Lake Mary, not Coldwater Creek (the original diversion point was located in Mammoth Creek above Lake Mary) and maintains flows in Bodle Ditch as a requirement of the management constraints that are contained in the District's water rights permit with the State Water Resources Control Board.

A3-4

4. Within the Hydrology and Water Quality chapter on pages IV.G-15 and IV.G-16, the impact of using recycled water is discussed. While possible mitigation measures are included in this section, the District would like to reiterate the importance that the Lahontan Regional Water Quality Control Board has placed on prohibiting recycled water from entering Mammoth Creek. The District is of the understanding that storage ponds used for recycled water must be able to contain water in a 100-year storm event. The District will be initiating the formal agreement process with Snowcreek in the near future for the use of recycled water on the golf course. We hope to address these issues and find an amicable method for supplying recycled water to the golf course.

A3-5

5. The Hydrology and Water Quality chapter should discuss the potential impacts to Mammoth Basin groundwater resources in the event that recycled water is not utilized for golf course irrigation. While the Draft EIR mentions the possibility of either potable or recycled water for such irrigation, it does not state the volume of groundwater that would be extracted in the event that potable water is utilized. The new nine-hole golf course is located outside of the District's service area and, thus, was not included in the water source assessment for this project. Potable water from the District's distribution system is not available for irrigation of the new nine-hole golf course, so it would be assumed that a production well would be constructed on site. Impacts to the District's groundwater supplies should be addressed in the Draft EIR in the event that groundwater is utilized for irrigation.

A3-6

6. Wastewater and water generation rates are discussed on pages IV.N-5 and IV.N-26. The District would like to clarify that these generation rates are based on actual billed usage in Mammoth Lakes and include occupancy fluctuations that occur in our resort community. The

A3-7

District does not utilize persons per household data for generation rates and only uses per unit billed usage information derived from customer meters. The generation rates per unit provide an accurate estimate of demands from future development based upon historical usage.

A3-7
(cont'd)

7. Footnotes 2 and 3 on Table IV.N-3 Existing Water Supply Reliability on page IV.N-17 should be revised. The projected volume of surface water available in a normal water year of 2,760 acre-feet has not been fully used by the District. The maximum quantity of surface water diverted by the District in a calendar year was 2,440 acre-feet in 1984. However, the District has the right to utilize 2,760 acre-feet if certain conditions of its water rights permit are met and anticipates utilizing this entitlement fully under normal water year conditions as the Town approaches build-out. The 4,000 acre-feet of projected groundwater available in a normal water year has also not been used by the District. In addition, there are no water rights associated with groundwater. The District has estimated that 4,000 acre-feet could be pumped from the Mammoth Basin in a normal water year without negative environmental impacts. The District is currently preparing a groundwater model of the Mammoth Basin, which could assist in adding confidence to this estimate, or possibly refining this figure. The maximum volume of water historically pumped from the Mammoth Basin by the District in a calendar year was 2,717 acre-feet in 2002.

A3-8

Thank you again for the opportunity to comment on this document. Please feel free to contact me if you have any questions.

A3-9

Sincerely,



Ericka Hegeman

Public Affairs and Environmental Specialist

MAMMOTH COMMUNITY WATER DISTRICT

P.O. BOX 597 MAMMOTH LAKES, CALIFORNIA

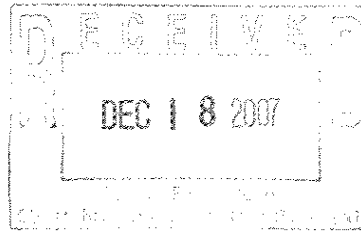
(760) 934-2596 FAX (760) 934-4080

December 17, 2007



A3a

Town of Mammoth Lakes
Planning Division
P.O. Box 1609
Mammoth Lakes, California 93456
Attention: Jen Daugherty



Re: Water Supply Assessment for the Snowcreek Master Plan

Dear Ms. Daugherty:

The following information is provided as a supplement to the Mammoth Community Water District's comment letter dated September 21, 2007, regarding the draft environmental impact report for the proposed Snowcreek VIII development project and the water supply assessment.

In 1977, the District entered into a settlement agreement with the Arcularius family ("Arcularius Agreement") which addressed the annexation of certain property into the District's service area ("Arcularius Property") and certain water right matters. The District agreed, upon completion of the annexation of the Arcularius Property, to provide water and sewer service to future development of such property to the extent of 2,400 residential units or their commercial equivalent, subject to certain terms and conditions. The number of residential units to which the District committed to provide water and sewer service was reduced to 2,332 in a 1983 agreement between the District and the successor to the Arcularius family, Dempsey Construction Corporation. To date, the District is providing service to 1,195 residential units of the 2,332 units to which the District has committed to provide service.

MAMMOTH COMMUNITY WATER DISTRICT

P.O. BOX 597 MAMMOTH LAKES, CALIFORNIA

(760) 934-2596 FAX (760) 934-4080

The proposed Snowcreek VIII project is within the Arcularius Property which was annexed to the District with the exception of the property associated with the recent land exchange with the U.S. Forest Service. By virtue of the Arcularius Agreement, the District is committed to provide water and sewer service to that portion of the Snowcreek VIII project which is within the Arcularius Property to the extent of the remaining unused residential units of 1,137 to which the District has committed to provide water and sewer service. The land exchange property is located outside of the District's service area; and there is no outstanding District obligation to provide water and sewer service to it.

Finally, the Arcularius Agreement allowed the Arcularius family, its successors and assigns to drill one water well on the Arcularius property utilizing water obtained therefrom, at a rate not to exceed 450 gallons per minute, for the purpose of maintaining the aesthetic and open space appearances of such property. A well was drilled and is currently being used to irrigate the existing 9-hole Snowcreek Golf Course.

The following water supply and demand tables are provided to reflect the District's commitment to provide water service to meet the demands reflected in the Snowcreek Master Plan.

MAMMOTH COMMUNITY WATER DISTRICT

P.O. BOX 597 MAMMOTH LAKES, CALIFORNIA

(760) 934-2596 FAX (760) 934-4080

Comparison of existing water supply with future demands

				Multiple Dry Water Years		
	Average/Normal Water Year	Single Dry Water Year	Year 1	Year 2	Year 3	Year 4
Current Supply Total	6760	3410	5190	4908	4508	4492
Existing Demand (1)	3652	3652	3652	3652	3652	3652
Future Demand Estimate (2)	1246	1246	1246	1246	1246	1246
Difference	1862	-1488	292	10	-390	-406
(1) Existing demand includes Snowcreek Master Plan supply commitment						
(2) Future demand estimate without Snowcreek Master Plan demand						
Units of Measure: Acre-feet per year						

Existing demand comparison with Snowcreek demand commitment and estimated future demands

Demand Type	2005	2010	2015	2020	2025
Existing Demand	3423	3423	3423	3423	3423
Snowcreek Master Plan Supply Commitment	229	229	229	229	229
Future Demand Estimate (1)	0	22	430	838	1246
Total	3652	3674	4082	4490	4898
(1) Future demand estimate does not include Snowcreek Master Plan demand					
Units of Measure: Acre-feet per year					

Should you have any questions regarding this matter, please feel free to contact me at the District office at 934-2596, extension 238.

Sincerely,



GARY SISSON,
General Manager

cc: Snowcreek Development Company

MAMMOTH COMMUNITY WATER DISTRICT
P.O. BOX 597 MAMMOTH LAKES, CALIFORNIA 93546
(760) 934-2596 FAX (760) 934-4080

January 10, 2008

Town of Mammoth Lakes
Planning Division
P.O. Box 1609
Mammoth Lakes, California 93456
Attention: Jen Daugherty

Re: Water Supply Assessment for the Snowcreek Master Plan

Dear Ms. Daugherty:

It has come to my attention that the Water Source Assessment (WSA) prepared for the Snowcreek VIII project and the tables provided in my letter dated December 17, 2007 require additional detail regarding the District's water loss reduction program and its impact on reducing water demand.

The District's water system loss reduction program is described on pages 21 and 22 of the WSA. The District has budgeted in its capital replacement program \$2.3 million dollars per year over the next eight (8) years to complete the program of replacing old and leaking main water pipelines. The replacement of these pipelines will result in an estimated savings of approximately 300 acre-feet of water, which will reduce the total projected future water demand at build-out of the community from 4,898 acre-feet per year to 4,598 acre-feet per year. About 112 acre-feet of water has been saved as a result of the water system loss reduction program through 2005.

In order to further show the impact of savings from the District's water system loss reduction program, the tables included in my letter dated December 17, 2007 have been revised and are included below.

Comparison of existing water supply with future demands

				Multiple Dry Water Years		
	Average/Normal Water Year	Single Dry Water Year	Year 1	Year 2	Year 3	Year 4
Current Supply Total	6760	3410	5190	4908	4508	4492
Existing Demand (1)	3652	3652	3652	3652	3652	3652
Future Demand Estimate (2)	1246	1246	1246	1246	1246	1246
Demand Reduction (3)	300	300	300	300	300	300
Difference	2162	-1188	592	310	-90	-106
(1) Existing demand includes Snowcreek Master Plan supply commitment (2) Future demand estimate without Snowcreek Master Plan demand (3) Water loss reduction program commenced in 2001, estimated to save 21.4 ac-ft/yr until completion in 2014. Units of Measure: Acre-feet per year						

Existing demand comparison with Snowcreek demand commitment and estimated future demands

Demand Type	2005	2010	2015	2020	2025
Existing Demand	3423	3423	3423	3423	3423
Snowcreek Master Plan Supply Commitment	229	229	229	229	229
Future Demand Estimate (1)	0	22	430	838	1246
Demand Reduction (2)		-214	-300	-300	-300
Total	3652	3460	3782	4190	4598
(1) Future demand estimate does not include Snowcreek Master Plan demand (2) Water loss reduction program commenced 2001, estimated to save 21.4 ac-ft/yr until completion in 2014. Units of Measure: Acre-feet per year					

Should you have any questions regarding this information, please feel free to contact me at the District office at 934-2596, extension 238.

Sincerely,
MAMMOTH COMMUNITY WATER DISTRICT

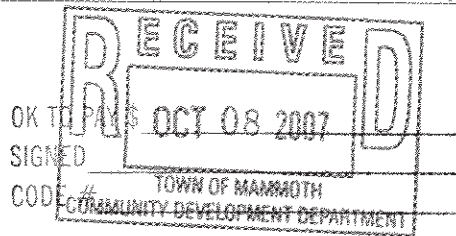


Gary Sisson,
General Manager

cc: Snowcreek Development Company

DEPARTMENT OF TRANSPORTATION

District 9
500 South Main Street
Bishop, CA 93514
PHONE (760) 872-0785
FAX (760) 872-0754
TTY 711 (760) 872-0785



*Flex your power!
Be energy efficient!*

A4

October 4, 2007

Jen Daugherty
Mammoth Lakes Community Development Department
P.O. Box 1609
Mammoth Lakes, California 93546

File: 09-MNO
DEIR
SCH #: 2006112015

Dear Ms. Daugherty:

**Snowcreek VIII, Snowcreek Master Plan Update Draft Environmental Report (DEIR)
(September 2007)**

Thank you for giving the California Department of Transportation (Caltrans) the opportunity to review the Snowcreek Master Plan Update. We appreciate that a Traffic Impact Analysis (TIA) was prepared including State Route (SR) 203. We have the following comments:

- The Highway Capacity Manual (HCM) Operations Method sheets do not show the mitigation analysis for adding an overlap to the eastbound (EB) right turn signal phase at SR 203 (Main Street) and SR 203 portion of Minaret Road (intersection #2). The analysis detail for this suggested mitigation is needed to verify its merit. Also, no consideration is given to other mitigation measures that may be more effective. Note that the HCM analysis doesn't account for the effective storage length of any movements. The ability of EB right turners to make use of an overlap depends on their not being trapped by the queue of EB through vehicles or unplowed snow. Further analysis is needed to determine if EB Lake Mary Road would need to be widened to make this mitigation work. The Town should verify if this measure should be solely provided by the project, exclusive of the Developer Impact Fee program. For further information on a signal overlap-right phase, you may contact Phil Graham at (760) 872-5248.
- Although not likely affecting TIA outcome: the turn movement numbers in the Appendix don't quite match those used in the body of the report; and the HCM analysis details do not reflect the correct right turn configuration for the any of the scenarios at EB SR 203 (Main Street) and Old Mammoth Road (intersection #6).

Please forward project information relevant to Caltrans. We value a cooperative relationship with the Town of Mammoth Lakes in transportation and development matters. Feel free to contact me at (760) 872-0785 with any questions.

Sincerely,

GAYLE J. ROSANDER
IGR/CEQA Coordinator

c: State Clearinghouse
Steve Wisniewski, Phil Graham, Caltrans



MONO COUNTY DEPARTMENT OF PUBLIC WORKS

A5

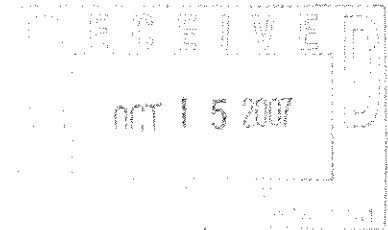
Post Office Box 457 • 74 North School Street • Bridgeport, California 93517
(760) 932-5440 • Fax (760) 932-5441 • monopw@mono.ca.gov

Evan Nikirk, PE
Director

Kelly Garcia, PE
Assistant Director

October 12, 2007

Jen Daugherty
Town of Mammoth Lakes, Community Development Department
Post Office Box 1609
Mammoth Lakes, California 93546



Via email & 1st Class Mail

Re: Draft Environmental Impact Report Comment
Snowcreek VIII, Snowcreek Master Plan Update (2007)

Dear Ms. Daugherty,

Mono County Department of Public Works (Public Works) staff have had an opportunity to review the Draft Environmental Impact Report (DEIR) prepared for the above-referenced project. It is our understanding the 45-day public comment period concludes on October 15.

A5-1

When reviewing development projects of this scale, Public Works is primarily concerned about potential waste generation impacts. In the past, development projects in Mammoth Lakes have often involved the clearing of undeveloped, forested lots. Although the trees are typically harvested by local firewood companies, the activity generates large quantities of tree stumps (or, root balls) that end up at Mono County's regional landfill, Benton Crossing Landfill, for disposal. Tree stumps are problematic in that they consume valuable airspace and are difficult to manage and bury due to their size and bulkiness.

A5-2

To the extent that tree waste will be generated by this project, Public Works requests that the Town of Mammoth Lakes mitigate impacts by imposing a condition on development permits issued for the project to require the developer and its contractor to chip all root balls or otherwise divert root balls and tree stumps from the Benton Crossing Landfill. Public Works asks that the Town apply this condition to all phases of the Snowcreek development.

A5-3

Thank you for your consideration. If you have any questions regarding this matter, please contact either Matt Carter, Project Coordinator, or me at 760.932.5440.

A5-4

Sincerely,

[original signed]

Evan Nikirk
Public Works Director

cc: Michael Grossblatt, Asst. to Town Mgr., Town of Mammoth Lakes

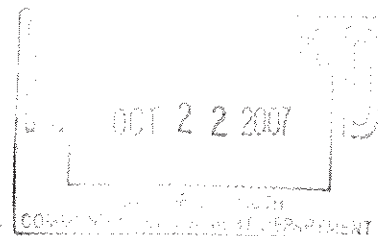
files: Correspondence; SW Correspondence.



BIG PINE PAIUTE TRIBE OF THE OWENS VALLEY
Big Pine Indian Reservation

October 22, 2007

Town of Mammoth Lakes, Community Development Department
 ATTN: Jen Daugherty
 PO Box 1609
 Mammoth Lakes, CA 93546



RE: Draft Environmental Impact Report for the Snowcreek VIII, Snowcreek Master Plan Update
 – 2007 Project (Zone Code Amendment 2006-04)

Dear Ms. Daugherty:

Please accept these comments on the Draft Environmental Impact Report (DEIR) for the Snowcreek VIII Project referenced above. Comments will address cultural resources, cumulative impacts, alternatives to the Proposed Project, and mitigation of adverse effects on cultural resources.

A6-1

1. A Native American Values section needs to be included within Cultural Resources analysis in the EIR.

There are members of the Big Pine Paiute Tribe of the Owens Valley that have cultural ties to the Long Valley/Mammoth Lakes area. The DEIR for Snowcreek VIII also states: "The Mammoth Lakes area was an intersection of several ethnic groups including the Mono Lake Paiute to the north, the Owens Valley Paiute to the south, Benton and Round Valley Paiute to the east, Monache to the west, and the Southern Sierra Miwok to the northwest" (p. IV.E-1). Snowcreek VII and the proposed Snowcreek VIII occupy one of the most significant sites in the area, CA-MNO-3. As Burton and Farrell state in **Cultural Resources Study for the Snowcreek VIII Master Plan Mammoth Lakes, California (Dec. 2006)**:

A6-2

The testing and data recovery results indicate that the central portion of CA-MNO-3 is unique in the Mammoth Lakes region. In the central portion of the site, the cultural deposit is up to 180 cm deep. Artifact densities reach over 30,000 per cubic meter, by far the densest site in the Mammoth Lakes area. The variety of artifacts encountered, including abundant ground stone artifacts, suggests relatively long-term use. Substantial subsistence activities are indicated by midden, that is, soils that have been significantly altered by human activity (p. 17).

Many tribal governments, including the Big Pine Paiute Tribe, became aware of Snowcreek VIII after the almost complete obliteration of CA-MNO-3 as a result of Snowcreek VII development activities. CA-MNO-3 was determined to be eligible for the California Register of Historic Places, and was categorized as a Significant Resource. However, "data recovery" was

A6-3

considered the mitigation which reduced the impact of the development to a Less Than Significant level. CA-MNO-3 is certainly eligible for listing on the California Register of Historical Resources under category (A) "Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage" (CEQA Guidelines, 15064.5). Under this category, CA-MNO-3 is eligible as a Traditional Cultural Property, as defined by *Guidelines for Evaluating and Documenting Traditional Cultural Properties* National Register Bulletin, 1998: "A traditional cultural property, then, can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community"(p. 1). As a Traditional Cultural Property, data recovery is not a form of mitigation because it destroys the land, artifacts, bedrock mortar features, and spirit which gives the cultural landscape its value. This is why there was such shock and outrage over the "data recovery" mitigation of Snowcreek VII in Native American communities of the Eastern Sierra. An eligibility determination of CA-MNO-3 as a Traditional Cultural Property should be included in the Final EIR for Snowcreek VIII. In relation to this, a current Ethnographic Study for the CA-MNO-3 site and Mammoth Lakes/Long Valley region should be conducted.

A6-3
(cont'd)

2. Impact CULT-1 Impacts to Known Cultural Resources

Since the Project "has the potential to impact CA-MNO-3 south of Old Mammoth Road (DEIR, p. IV.E-9), Archaeological and Native American Monitors should be present during all groundbreaking activities in the Project Area south of Old Mammoth Road. Even though the golf course area has been extremely modified, there may still be deep cultural material or other types of artifacts that could be uncovered during Project-related changes to the golf course. Also, because of the proximity to CA-MNO-3 and the destruction of cultural resources at Snowcreek VII, archaeological and Native American monitors should be in areas D and E as well (Figure 15, Burton and Farrell, 2006, p. 19).

A6-4

Before Snowcreek VII, there apparently was inadequate mitigation regarding CA-MNO-3 and cultural resources: "No archaeological work was apparently done for other changes, such as the excavation of two ornamental ponds and the construction of the Snowcreek Rental Office, both located in an area Leonard (1974) recommended as a preserve. Utilities and landscape irrigation systems have been buried (Burton and Farrell, Dec. 2006, p. 20). What phases of the previous Snowcreek developments were these projects a part of? The dates of these construction projects need to be stated, and an explanation of why these projects were not subject to CEQA also needs to be explained.

A6-5

Mitigation Measure CULT-2a.

A Monitoring and Reporting Plan (MMRP) should be implemented for the Project Area south of Old Mammoth Creek Road. A MMRP is not needed north of Old Mammoth Road because no construction activities north of Old Mammoth Road should occur in order to reduce potential impacts on CA-MNO-3 to a Less Than Significant Level. The MMRP should be prepared in consultation with consulting Native American tribes and communities.

A6-6

Mitigation Measure CULT-2b.

This mitigation should include a Native American Monitor and should pertain to the portion of the project site *south* of Old Mammoth Road.

A6-7

Mitigation Measure CULT-2c.

"or preservation" should be added after the last sentence of the section.

A6-8

Mitigation Measure CULT-2c.

After the passage of Assembly Bill No. 2641, last September, the MLD has 48 hours to make recommendations. please revise.

A6-9

3. Mitigation Measure CULT-1 (DEIR, p. IV.E-10).

The first two mitigation measures proposed, *plan construction to avoid the site* (if no construction is allowed north of Old Mammoth Road), and *deed conservation easements* will reduce the significant impact to a less than significant level. The other two suggested mitigation measures, "Capping the site prior to construction and "perform archaeological data recovery" will still cause significant adverse impacts to CA-MNO-3 both as a Traditional Cultural Property as well as significant archaeological resource, and thus are not acceptable mitigation measures. . CEQA Guidelines 15126.4(b)(3)(A) state:

A6-10

(b) Mitigation Measures Related to Impacts on Historical Resources.

(3) Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

(A) *Preservation in place is the preferred manner of mitigating impacts to archaeological sites.* Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site (emphasis added).

Adverse impacts to CA-MNO-3 as a Traditional Cultural Property as well as a Significant Archaeological Resource can be mitigated by avoiding any development north of Old Mammoth Road. No development north of Old Mammoth Road is proposed in all the Alternatives to the Proposed Project except Alternative D, Increase Density (DEIR, p. VI-6). If the Proposed Project is chosen by the Town of Mammoth Lakes, then Adverse impacts to CA-MNO-3 can be avoided by either not building the proposed Market/General Store and Natural Resources and Historic Interpretive Center, or relocating these developments and associated parking areas in the Project area south of Old Mammoth Road and west of the Urban Growth Boundary.

A6-11

Since the Project Area north of Mammoth Creek Road is on the extreme northern periphery of the Project Area and is bordered on the north by land designated as Open Space Stream Corridor (OSSC), a logical mitigation of the Project's impacts on CA-MNO-3 would be to avoid all

A6-12

construction north of Old Mammoth Road into a permanent conservation easement. This will also increase the aesthetic and biological values of the Mammoth Creek OSSC.

A6-12
(cont'd)

All of the Project Area north of Old Mammoth Road lies within CA-MNO-3. Even though "prehistoric" artifacts were found between the old 1974 site boundary as delineated by Leonard (1974) and Minaret Road, Burton and Farrell's 2006 Cultural Resources Study of Snowcreek VIII does not expand the site boundary to include this area. An update of a previously recorded archaeological site should always include updated site boundaries. Also, the Archaeological Significance of those portions of the site which are less dense in archaeological artifacts should not be considered "not significant." This destroys the archaeological integrity of the site as a whole. All archaeological sites have areas where there are a concentration of artifacts, and areas which are less dense. Considering only the densest parts of a site as "Significant" according to CEQA is destructive to archaeological site preservation and should not be accepted.

A6-13

A6-14

Any proposed bike path through the Project Area north of Old Mammoth Road should not be constructed in order to prevent harm to archaeological resources and the Native American cultural values of the site.

A6-15

Cumulative Impacts. In the Cumulative Impact section regarding Cultural Resources (DEIR, p. IV.E-12), there is no mention of Snowcreek VII, Number 23 on the "Related Projects" list, and currently under construction. As CEQA Guidelines state at 15355:

"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
(a) The individual effects may be changes resulting from a single project or a number of separate projects.
(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

A6-16

Snowcreek VII completely obliterated the western portion of CA-MNO-3, and this obviously produces a cumulative impact related to any construction activities north of Old Mammoth Road which will obliterate the eastern portion of CA-MNO-3. Again, "data recovery" will not preserve the Native American values of CA-MNO-3 which are related to its significance as a Traditional Cultural Property. It also is not an appropriate mitigation measure for its archaeological value in light of the site destruction after Snowcreek VII.

There also needs to be a more in depth cumulative impact analysis regarding cultural resources for the other Related Projects. What cultural resource studies have been conducted for these projects? How many archaeological sites are already known to exist in the areas of the Related Projects, as recorded at the California Historical Resources inventory System (CHRIS) Eastern Information Center, Riverside, CA? What ethnographic studies related to the project are being conducted?

A6-17

The western portion of CA-MNO-3 was destroyed by Snowcreek VII, the construction of the Snowcreek Rental Office north of Old Mammoth Road, and the golf course south of Old Mammoth Road. The Sherwin Project (a proposed 120 unit condominium hotel, No. 33 on the Related Projects List, DEIR, p. II-26) is proposed for the northeast corner of Old Mammoth Road and Minaret Road, directly to the east of CA-MNO-3. And of course, the bulk of Snowcreek VIII is slated to be developed south of CA-MNO-3, no matter what Alternative is chosen. Except for the Open Space area immediately to the north of CA-MNO-3 in the Project area, the last remnant of one of the most significant cultural sites in Mammoth Lakes will be surrounded on all sides by development. Present and future generations deserve to have this precious land preserved and valued as a place for cultural and spiritual renewal.

A6-18

Sincerely,

Bill Helmer

Bill Helmer
Tribal Historic Preservation Officer

A7**Jen Daugherty**

From: Theresa Yanez [Theresa.Yanez@bishoppaiute.org]
Sent: Monday, October 22, 2007 5:04 PM
To: Jen Daugherty
Subject: Bishop Tribe Comment

October 22, 2007

Dear Mr. Clark:

In your letter of August 1, 2007, it is unclear whether you are claiming that the Bishop Paiute Tribe was contacted about the most recent Snowcreek project or whether you are stating that the Tribe did not need to be contacted by the Town of Mammoth Lakes. Recently, the Town of Mammoth Lakes went forward with its general plan without consulting the tribe. The Tribe is concerned that the newest project will impact Tribal sites present on or near the project area. In the past, Tribal sites in this area were destroyed during other phases of the Snowcreek Master Plan.

A7-1

A7-2

A7-3

According to SB 18, local (city and county) governments are required "to consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning" (Supplement to General Plan Guidelines: Tribal Consultation Guidelines [Interim] State of California Governor's Office of Planning and Research [March 1, 2005]). This must be done through government to government contact, not through general announcements of meetings and hearings.

A7-4

We request to be notified of any archaeological surveys or excavations that will be conducted in preparation for this project. We request to be present for consultation during any archaeological survey or any earth-moving activities at every stage of preparation for the project and at every stage of the project.

A7-5

The bishop tribe No construction on the old side of mammoth road, also that you should do an ethnographic study, and have certified Native American Monitor should be on staff per every five heavy equipment operator.

A7-6

Theresa Stone-Yanez, THPO

Bishop Paiute Tribe
Tribal Historic Preservation Office
Paiute Professional Building
50 Tu Su Lane
Bishop, CA 93514
760.873.3584 ext 250
Fax 760.873.4143

Email: theresa.yanez@bishoppaiute.org

10/22/2007

A8

Mono Lake Kutzadika^a Indian Community
Cultural Preservation Association
 296 Mattly Avenue
 P.O. Box 237
 Lee Vining, CA 93541-0237

President: Raymond Andrews

Vice-President: William J. Andrews

Secretary/Treasurer: Vineca Lou Hess

ATTN: Je Daugherty
 Town of Mammoth Lakes
 Community Development Department
 P.O. Box 609
 Mammoth Lakes, CA 93546-1609

October 22, 2007
 Monday

Subject: Snowcreek VIII, Snowcreek Master Plan Update-2007
 Draft Environmental Impact Report (DEIR)

Dear Ms. Daugherty,

The Mono Lake Kutzadika^a Tribe and Mono Lake Kutzadika^a Indian Community Cultural Preservation Association respectfully submit the following comments regarding the Snowcreek Master Plan Update-2007.

A8-1

We are all quite concerned with the events that transpired this past summer during the grading of the Hilltop Development project and the entire Snowcreek VII "project". The total disrespect and disregard of another's culture and the total desecration of a "uniquely significant cultural site". The prehistory of the Mono County tribe (s), the town of Mammoth Lakes, the county, the state and the nation. How shameful.

A8-2

We couldn't understand why during the preliminary reporting by the "archaeologist", MNO-3 was unique and eligible for nomination to the Federal Register of Historical Places that construction was even considered.

A8-3

We believe that peer review should have been on-going, particularly when such a large amount of artifacts were previously recorded and sub-surface "artifacts" were unknown. We strongly believe that further archaeological "study" should have been conducted when the significant amount of artifacts were unearthed during grading. The hired archaeologist should have halted all ground-disturbing activities, however that was not the case.

A8-4

Therefore we offer that following recommendations to ensure what happened at Snowcreek VII does not happen in the future.

A8-5

- That an extensive study be carried out before to any ground-disturbing activity is initiated.
- During any ground-disturbing activity we strongly recommend the employment of local Native American monitor(s).
- Peer review be done for the archaeologist hired during and following findings to ensure unbiased evaluation and documentation.
- We recommend hiring (contracting) with a University that has worked in this area and with the Native American people (i.e.: Sacramento State/UCLA) for the peer review process.
- We further recommend that the project hire an anthropologist.

A8-6

A8-7

A8-8

A8-9

A8-10

Thanking you in advance for your favorable consideration of these recommendations.

Sincerely yours,

for Charlotte Lange
 Charlotte Lange, Tribal Chairwoman

Raymond Andrews
 Raymond Andrews, President Cultural Preservation Association

Jen Daugherty

From: Mike Schlafmann [mschlafmann@fs.fed.us]
Sent: Monday, October 22, 2007 3:27 PM
To: Jen Daugherty
Subject: Snowcreek 8 Comments

Attachments: Snowcreek8_10.22.07.doc



Snowcreek8_10.22.
07.doc (47 KB..

Enclosed please find comments from the Forest Service on the Snowcreek 8 Draft EIR.

Hardcopy will follow via fax.

(See attached file: Snowcreek8_10.22.07.doc)

Michael Schlafmann
Deputy District Ranger
Mammoth and Mono Lake Districts
Inyo National Forest
(760)-647-3033 Work
(760)-709-1264 Cell
(760)-924-3027 Fax
mschlafmann@fs.fed.us

No virus found in this incoming message.
Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.5/1085 - Release Date: 10/22/2007 10:35 AM



United States
Department of
Agriculture

Forest
Service

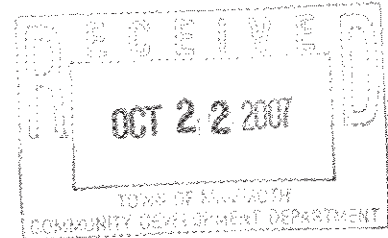
Inyo National Forest

Mammoth Ranger Station
P.O. Box 148
Mammoth Lakes, CA 93546
(760) 924-5500
(760) 924-5531 TDD

File Code: 1950

Date: October 22, 2007

Town of Mammoth Lakes
Community Development Department
POB 1609
ATTN: Jen Daugherty
Mammoth Lakes, CA 93546



Dear Ms. Jen Daugherty,

The Inyo National Forest (INF) appreciates the opportunity to provide input regarding the Town of Mammoth Lake's (TML) Draft Environmental Impact Report and accompanying Draft General Plan.

A9-1

Recreation, as identified in the Inyo National Forest LRMP, is the most important public resource available on the Inyo National Forest. The Forest Service would like to take this opportunity to state again, the Inyo National Forest recognizes the role of public lands as a "backyard" critical to the well-being of Mammoth Lakes residents, and the role of the Town of Mammoth Lakes as a gateway community providing access and amenities that augment recreation on the INF. The Forest Service also recognizes the central role of tourism and related public lands recreation in the economy of Mammoth Lakes.

A9-2

The majority of land within the town limits of Mammoth Lakes, and surrounding those limits, is National Forest System administered by the Inyo National Forest. Consistency and coordination between the Inyo National Forest Land and Resource Management Plan (LRMP) and Town of Mammoth Lakes private land development is of critical importance to both agencies.

Comments below relate to the need for coordination across jurisdictional boundaries, and the need to consider effects of private land development on adjacent National Forest System Lands in meeting requirements under the California Environmental Quality Act.

A9-3

In general, the Proposal as depicted includes facilities, such as the outfitters cabin, clearly intended to take advantage of amenities and opportunities on adjacent public lands. However, potential impacts associated with these activities are not addressed in the analysis. Analysis of direct, indirect and cumulative effects of the proposal and alternatives on adjacent FS System Lands should be addressed in order to provide for a meaningful display of benefits, impacts and tradeoffs and to provide for a meaningful choice between alternatives.

A9-4

Vehicular Circulation and Parking Systems

Although it is clear the proponent intends to utilize Sherwin Creek Road to access proposed facilities for maintenance and operations, and to utilize Sherwin Creek Rd. as a portal to amenities such as the Outfitter's Cabin, and as a means of enhancing public access to the proposed development and adjacent public lands, it is not clear why Sherwin Creek road is not

A9-5



considered in the Vehicular Circulation analysis or why the effects of the proposal on Sherwin Creek Road are not analyzed.

As an example, it is apparent the proponent intends to utilize Sherwin Creek Road to access the Outfitter's Cabin year round. In it's current configuration, Sherwin Creek Road may not be suitable for winter use (i.e. plowing and winter maintenance). Although paving would partially remedy FS concerns, no such improvements are proposed or discussed. Further, the FS has not been approached by the proponent with any proposals for winter use and maintenance of Sherwin Creek Road. The road is currently not maintained past Sierra Meadows Resort in the winter.

A9-5
(cont'd)

Any winter use would require authorization by the FS.

In addition, it not clear why the Sherwin/ Old Mammoth Road intersection is not considered a project study intersection. Increased traffic under all alternatives will have an effect on Sherwin Creek Road and the Sherwin Creek Road intersection with Old Mammoth Road. Alternative B contemplates substantial changes to the Sherwin/ Old Mammoth Road intersection, including actions that would occur on National Forest System Lands. Again, any action proposed on the National Forest will require review under the National Environmental Policy Act and subsequent authorization.

A9-6

Wildlife Management

Wildlife management practices do not appear to address off-site impacts on adjacent FS System Lands. Adjacent FS System Lands contiguous with the proposal but outside the UGB should be included in the scope of either the analysis or mitigations.

A9-7

Inyo National Forest Land and Resource Management Plan

The Sierra Nevada Forest Plan Amendment of 2001 was superseded by the Sierra Nevada Forest Plan Amendment Record of Decision of 2004. All references and materials utilized in this EIR should draw from the 1988 Inyo National Forest Land and Resource Management Plan as amended by the 2004 SNFP ROD.

A9-8

Although the FS appreciates TML efforts to coordinate to ensure projects are consistent with FS direction, it is not clear how the analysis accounts for either consistency with FS direction or effects on adjacent FS lands. A description of relevant Forest direction should be provided, including disclosure of environmental effects of the proposal on adjacent Forest Service lands.

A9-9

Alternative B

Although Alternative B may have beneficial effects on adjacent National Forest System Lands when compared with the other alternatives (i.e. visual quality, public access to public lands) none of these effects are considered or disclosed in the analysis.

A9-10

More importantly, as depicted Alternative B contemplates several improvements on National Forest System Lands which have not been considered under the National Environmental Policy Act, nor authorized by the Forest Service, including: "USFS Trails Staging Areas," use of

Sherwin Creek Road as a means of access for course maintenance, and apparent improvements to existing road on National Forest System Lands.

A9-10
(cont'd)

In closing, we look forward to continuing to work with the Town of Mammoth Lakes to refine the analysis for Snowcreek 8 to ensure consideration of direct, indirect and cumulative effects on adjacent National Forest System Lands.

Please contact me at your earliest convenience to discuss how we may better coordinate and to consider an appropriate Forest Service role in this process.

A9-11

I can be contacted via phone at 760.647.3033 or via email at mschlafmann@fs.fed.us.

Sincerely,

/S/ MICHAEL SCHLAFMANN

Michael Schlafmann
Deputy District Ranger
MAMMMOTH/ MONO LAKE DISTRICTS



Mammoth Lakes Fire Protection District
 Post Office Box 5, 3150 Main Street
 Mammoth Lakes, CA 93546
 760-934-2300 Fax- 760-934-9210

October 25, 2007

Ms. Jen Daugherty
 Town of Mammoth Lakes
 PO Box 1609
 Mammoth Lakes, CA 93546

Re: Snowcreek VIII Master Plan EIR Comments

Thank you for the opportunity to comment on the above document. The Fire District has the following comments concerning the project and its construction.

A10-1

General Comments:

A10-2

Building Codes: This project will be required to comply with the new California Amended International Codes that will be adopted on January 1, 2008.

A10-3

Traffic: The Fire District has a concern about the existing amount of traffic on Old Mammoth Road during peak holiday periods. This is compounded during times of inclement weather. Possible alternatives or additional routes were not analyzed/identified.

A10-4

Roadways: The Fire District would like to see the Snowcreek VIII project provide a direct alternate means of access for the Snowcreek V residential project. These routes should be separated by a minimum of 1500 feet.
 As described in the new Code, the Fire District would require that the proposed project provide "two separate and approved fire apparatus access roads when a project

exceeds 200 units”.

Though not identified anywhere in the document, the Fire District would prefer that Snowcreek VIII not be a gated community.

A10-4
(cont'd)

Individual Comments:

Page I-53 Impact PS-3 Fire Services: Include a statement under Mitigation Measures that states “Proponent to provide fair share of Developer Impact Fees to assist in the additional impacts that the project brings to the Fire District.

A10-5

Page I-62 Impact TRANS-4 Parking: Include an item about on-site areas for emergency vehicle parking being designed into each phase of the project.

A10-6

Page I-66 Impact TRANS-10 Construction: Include the requirement that utilities and road pavement will be in place prior to the delivery of combustible construction products.

A10-7

Page I-71 Utilities: Include a section that addresses the requirement for the installation of propane isolation valves in approved locations.

A10-8

Page III-34 Public Plazas, Walkways, Ponds, and Streams: The plazas and walkways may be required to double as emergency vehicle access routes.

A10-9

Pages IV.K-6 to VI.K-9 Fire Protection Services: The impact of adding this project (19% of the remaining buildout development) will cause the Fire District to hire additional employees, which will cause the need for additional station space, housing, administration, and vehicles. This increase will be necessary in order to maintain acceptable service ratios, response times, inspection needs, and general fire protection objectives. Because of this, the cumulative impact should be indicated as **significant**.

A10-10

Page IV.M-23 Impact TRANS-11 Cumulative Impacts: As the project is going to significantly increase the number of peak time visitors (19% of the remaining buildout development), additional traffic mitigation should include the extension of Chateau Road to Sierra Park Road or the extension of Chateau Road to Meridian Blvd.

A10-11

Ms. Jen Daugherty
2006 Revised Snowcreek Master Plan EIR Comments
Page 3

Thank you again for the opportunity to comment. If you need any additional information, please feel free to contact me at your convenience.

A10-12

Sincerely,

/s/ Thom Heller

THOM HELLER
Fire Marshal

B1

Jen Daugherty

From: Kay Stern [kayandted@cox.net]
Sent: Tuesday, September 18, 2007 2:06 PM
To: Jen Daugherty
Subject: draft EIR

I have read the entire document and am impressed with the amount of data it contains. I wish to express deep disappointment at the incompleteness of the document for failing to cover the environmental impact of the project (Snowcreek VIII) in its finished state as well as over its years of construction, on the most impacted body: the next door neighbor, Snowcreek V, abutting the planned development.

I have confidence that Environmental Impact report writers have experience at considering all the impacts, on the total town and the most adjacent impacts. Please explain why this most imperative part of an environmental impact study was missing. Is there a part of the study which did not get on the website? Is this an oversight?

Thank you, Kay Stern, Homewowner, Snowcreek V #813

B1-1

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.487 / Virus Database: 269.13.22/1015 - Release Date: 9/18/2007 11:53 AM

B2**Jen Daugherty**

From: Mark Deem [mark@thefoundry.com]
Sent: Thursday, September 20, 2007 9:13 AM
To: Jen Daugherty
Subject: Snowcreek VIII

Good Day,

This email is to comment on the draft EIR regarding Snowcreek VIII development. I have reviewed the plans and the EIR, and as a current Snocreek V owner, I am generally in favor of the development. If I had complete freedom of choice, I would rather that the current high desert be preserved, but being a realist and recognizing that these plans have been in the works for years, I think that the plan in general is a reasonably sound one.

B2-1

There is one aspect of the plan that concerns me greatly, however. The hotel as proposed will be the single largest building to ever be built in this entire section of town. All other Snocreek properties to date have done a good job of integrating designs and colors which minimize their visual impact to the surroundings and to other Snocreek phases. If this hotel goes in as proposed, however, it will have a serious impact not only on the surrounding, existin Snocreek properties, but on the town as well. I am concerned about the overall height of the hotel as well as its impact on the "dark hours". If the existing town limits are enforced and the hotel is limited to a couple of stories, I believe the impact will be relatively reasonable. If, however, the town amends the existing rules and allows multi-story building in an area where all existing building is limited to 2 stories, it will stand out literally above and beyond all other development, impacting views of the Sherwins and the White Mountains for residents of both Snowcreek and the rest of the town.

B2-2

I strongly urge the town to limit the height of the proposed Snowcreek VIII hotel to a more reasonable 2-3 stories, consistent with existing and most other planned development.

Thanks You,

Mark Deem
Snowcreek Phase V

Mark Deem
Chief Technology Officer
The Foundry, Inc.

199 Jefferson Drive
Menlo Park, CA 94025

650.326.2656 t.
650.302.3018 m
650.326.3108 f.

www.thefoundry.com

This email and any attached files are confidential and intended solely for the intended recipient(s). If you are not the named recipient you should not read, distribute, copy or alter this email. Any views or opinions expressed in this email are those of the author and do not represent those of the company. Warning: Although precautions have been taken to make sure no viruses are present in this email, the company cannot accept responsibility for any loss or damage that arise from the use of this email or

9/20/2007

attachments.

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.487 / Virus Database: 269.13.27/1020 - Release Date: 9/20/2007 12:07 PM

B3**Jen Daugherty**

From: Donald Davis [dwd@donalddavis.com]
Sent: Monday, September 24, 2007 10:22 AM
To: Jen Daugherty
Subject: Snowcreek concerns

Hello Jen,

My wife and I are owners at Snowcreek and have concerns regarding the proposed project to build out Snowcreek.

I have reviewed the EIR and as much as I would prefer to see the minimum in terms of new development, I recognize that eventually there will be a project underway.

B3-1

At this point, my primary concern is for scrutiny of the construction process, with implementation of the best possible actions to minimize dust, noise, and disruption. I would like to see an environmentally conscientious approach to waste management with an emphasis on materials recycling.

B3-2

B3-3

My other comment is that nowhere in the report do I see any accommodation of contemporary artistic venues. Too often this specific oversight is realized too late, after infrastructure is planned and built. It is accepted that these venues are an attractive, vital and culturally nourishing part of a community. Please consider the importance of amenities like stages for performances, bandshells, studio facilities for art workshops and locations and programs for the placement of public art.

B3-4

I would be happy to explore these ideas with you or anyone else.

B3-5

Sincerely,

Donald Davis

Donald Davis
home: 805-969-2760
cell: 805-452-9180
email: dwd@donalddavis.com
web: <http://www.donalddavis.com>

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.30/1027 - Release Date: 9/24/2007 11:27 AM

9/24/2007

B4**Jen Daugherty**

From: Jackie Erickson [jerickson@comcast.net]
Sent: Monday, September 24, 2007 5:08 PM
To: Jen Daugherty
Subject: Snowcreek VIII Draft EIR

Hello Jen,

My name is Jackie Erickson and my family and I are frequent visitors to Mammoth Lakes, particularly renting units in the Snowcreek V development.

B4-1

I understand that Snowcreek is moving forward with plans for the next phase of their development - Snowcreek VIII.

I have read the Snowcreek VIII Draft Environmental Impact Report, and I am concerned that the plans for a large hotel could negatively impact the views and tranquil setting in the existing units.

B4-2

I would like request that the Town of Mammoth Lakes, Community Development Department enforce current town regulations and limit the hotel size to a maximum of 2-3 stories.

Thank you for your consideration.

Best Regards,
Jackie & Brad Erickson
408-356-4452
jerickson@comcast.net

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.30/1027 - Release Date: 9/24/2007 11:27 AM

9/24/2007

B5**Jen Daugherty**

From: Kearney, Krista [krista.kearney@tycoelectronics.com]
Sent: Monday, September 24, 2007 8:47 PM
To: Jen Daugherty
Subject: Snowcreek
Importance: High

Hi Jen-

I am very disturbed by some news I have heard recently about Mammoth. We try to come for vacation at Mammoth as often as we can, we live in Seattle, WA. I am a frequent renter at the Snowcreek area and I am worried about the Snowcreek VII Draft EIR and I ask that you enforce the current Town reqs and limit the hotel size to 2-3 stories only. I do not want the beautiful view taken away. I ask for your help and to strongly encourage you to keep Snowcreek as a place that my family wants to come to year after year

B5-1

Thanks,
Krista

Krista Kearney
Tyco Electronics
GIC&E-Medical & Instrumentation
Sales Engineer
(425) 957-0116 office
(425) 765-9925 cell
krista.kearney@tycoelectronics.com

****MEDICAL SOLUTIONS for Relays, Circuit Breakers, Transformers, Timers, Interconnects, Terminal Blocks, Switches, Wire & Cable, Harnessing, Protection, Identification, Labeling and Value-Added Assemblies****

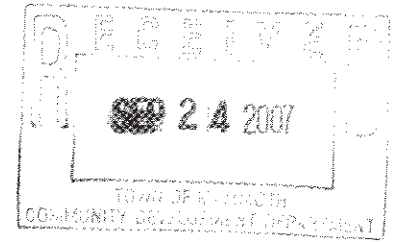
No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.30/1027 - Release Date: 9/24/2007 11:27 AM

9/26/2007

Jen Daughert
Assistant Planner
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, Ca. 93546



RE: Snow creek VIII Draft EIR

9/24/07

B6

Dear Jen,

Thank you for taking the time to answer my recent question on the above topic. In the review of your answers however I still am concerned regarding the projected traffic that will be backing up at the intersection of Old Mammoth road and Minaret Road.

B6-1

If fairway drive is intended to be the only access to this entire complex, when built out, I would like to know on a busy winter holiday weekend or summer weekend:

- 1) How many people are expected to be A) staying at these condos B) at the Hotel C) visiting the golf course D) looking at property E) shopping at the commercial space F) working at these facilities.

B6-2

- 2) Add this number to the Cardinal development numbers for this intersection on a busy weekend.

B6-3

The draft EIR talks in terms of 29 second wait, or slightly more. I live at that intersection in Mammoth Creek condos and wait that long now on a busy weekend. They haven't even broken ground yet!

B6-4

Respectfully,

George Sandvig
Unit 31, Mammoth Creek Condo

E:mail gsandvig@kanzakiusa.com
Phone: 949-510-2083

B7**Jen Daugherty**

From: Swan, Jeff [jeffswan@netsuite.com]
Sent: Tuesday, September 25, 2007 11:10 AM
To: Jen Daugherty
Subject: Snowcreek VIII Draft EIR

Jenny Dougherty,

My name is Jeff Swan, and I'm excited to say that I have had a number of opportunities to visit your town. I love the beauty of the natural surroundings, being so close to the ski slopes, and having a wonderful town where I enjoy meals. I am writing today because I recently learned that Snowcreek is planning to build a mammoth (pun intended) hotel that will take away from the natural beauty I have come to enjoy over the years. I have always understood there to be a limit on building that keeps buildings to a 2 or 3 story limit, and I believe your previous enforcement of this has allowed us to mix well with nature. I am writing to urge you NOT to allow Snowcreek to build an 8-story building. This building would hurt the natural view we enjoy today. I am excited to stay in places that Snowcreek has developed (Snowcreek V), but I believe there has to be a limit and I am respectfully requesting that you continue to impose that limit.

B7-1

B7-2

Sincerely,
Jeff Swan

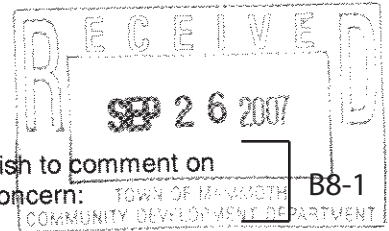
No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.30/1030 - Release Date: 9/25/2007 8:02 AM

9/25/2007

B8



I am a Snowcreek V homeowner (as well as other properties in the area) and wish to comment on the plans for Snowcreek VIII. Generally I am supportive but do have areas of concern:

- Access to Snowcreek V
 - The current road is eliminated and now access to V is through VIII. It appears it not only lengthens the distance, but traffic on this road will now need to support both V and VIII. I have concerns that this will cause access problems for those that live in V. Additionally, who is responsible for snow removal on a road that serves both V and VIII? It would seem to me that a more direct road to V with access to VIII would be better rather than directing all traffic though VIII.
- General Store
 - The town of Mammoth is in desperate need of another grocery store. The current VONS is woefully inadequate to serve the needs of the community. I am not sure what purpose a "general store" is to the community and would like to see another grocery store in the town.
- Retail
 - The Town is in need of more retail along main access roads such as Old Mammoth. This very large parcel is basically more residential without offsetting retail to serve the community. I would like to see more retail storefronts along Old Mammoth to service the community as there is nothing one can walk to in the surrounding area. It seems to me that Mammoth needs to develop a small town community feel and not a weekend warrior ski area servicing So Cal. By having more retail along Old Mammoth that connects to the existing retail, a town could be developed that would encourage walking. If you go to other successful ski communities like Breckenridge, you really feel the desire to walk and become part of the community. Today even though Mammoth is only 4 sq miles, everyone feels the need to get in the car and go. Please don't let Mammoth become another "Los Angeles". Lets promote community.
- Hotel
 - Does the area really need another large hotel? We now have the Village, the Westin, all of the new development from Intrawest and I believe some new hotels planned near the village. As such, the amount of rental space is enormous. As an owner of three properties in Mammoth (Snowcreek, Village, Juniper Crest), I can tell you that rentals are in a surplus. I don't think we need another 8 story hotel.
 - What would be better is something that draws people TO Mammoth. The town currently has very little convention space aside from that which exists at Grand Sierra Lodge. When the airport is in operation, pulling company events into Mammoth could be a reality. Today its not as one has to drive 5-6 hours to get there. But assuming the airport becomes a reality, then convention space, retail, and the feel of community will be a draw to bring people to Mammoth year-round.
 - I recommend the town reduce the size of hotel space but expand commercial/retail instead.
- Alternative B
 - I took a look at the alternatives to the proposed project and believe Alternative B (or modification thereof) is a better approach:
 - Places the commercial/retail along the Old Mammoth corridor thus making it "available" to the "community"
 - The road to Snowcreek V is more direct and not running though VIII. It should lessen the traffic burden. The current project places too much traffic through areas where children could be playing.
 - I would reduce the size of the hotel and make it more of a Lodge. Probably half the size and height would be better thus reducing the impact it would have on hindering views.
 - Pedestrian connections should be made to the existing Town promoting the community.

B8-2

B8-3

B8-4

B8-5

B8-6

B8-7

B8-8

- Would add a grocery store to reduce the overcrowded situation existing at Vons today

B8-8
cont'd

Snowcreek 8 should not be looked at as just another residential expansion but an opportunity for the Town to achieve some of its goals. If not developed properly it would just add to the current isolation that is felt by the residents. Meaning come and ski but there is nothing else to do and the chance to meet and connect with people seldom happens.

B8-9

If you have any questions please feel free to contact me. Also if there is a meeting that is being held as an open forum to comment, let me know the day and I will try to attend.

B8-10

Thank you,
Randy Ringold
(949) 275-0054

B9

Jen Daugherty

From: DeeO1210@aol.com
Sent: Thursday, September 27, 2007 10:53 AM
To: Jen Daugherty
Cc: jomeste@hhshoppers.com; News@snowcreekv.com; DeMarco185@aol.com
Subject: Snowcreek development

Dear Ms. Daugherty,

I was given your contact information regarding the upcoming proposed development for Snowcreek. It is my understanding that you can answer questions and concerns. While I understand the advantages that a true resort will offer, I have concerns regarding noise and traffic. I hope the problems of the main Village area are prevented at the new Snowcreek Village. We stopped staying at the Village because the noise from the bars and late night restaurants made sleeping impossible. We are now owners of a townhome at Snowcreek V and we would be very disappointed if our future retirement home turns into party central. We welcome the addition of a daytime activity center and quiet early closing eating establishments, but noisy bars do not belong in our residential area. The word "lounge" that is used in the development description raised my fears. If you have any information regarding this matter please advise.

B9-1

Thank you,
Donna Omeste,
Snowcreek 1002

See what's new at AOL.com and [Make AOL Your Homepage](#).

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.32/1033 - Release Date: 9/27/2007 11:06 AM

10/22/2007

B10**Jen Daugherty**

From: Becker, Cynthia [Cynthia.Becker@aa.com]
Sent: Friday, September 28, 2007 3:38 PM
To: Jen Daugherty
Subject: Hotel in Mammoth

Hi Cindy,

Could you do me a favor and send the message below to this address? jdaugherty@ci.mammoth-lakes.ca.us

To Whom It May Concern,

This is in response to the Draft Snowcreek VIII EIR. I am very concerned about several aspects of this development. My greatest concern is the plan for a large hotel. According to the report, this is inconsistent with the Town Development Code. The report also states that the **“cumulative impacts with respect to scenic resources and existing visual character would be significant and unavoidable”**. A hotel of that size would greatly impact views in and around the area -- views of the Sherwin Mountains, the White Mountains, views from Old Mammoth Road, and views from all the hiking and biking trails in the area.

However, if the hotel were kept to a height of 2-3 stories, consistent with existing developments and town zoning, I think the beauty and character of Mammoth could be preserved. The protection of scenic areas and scenic resources should remain a priority in Mammoth and the zoning codes should not be amended to allow for taller buildings.

I urge the town to either eliminate the hotel from the plans for this development or to limit the height of the hotel to 2-3 stories.

Thank you for your consideration.

Sincerely,

Cynthia Becker

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.33/1034 - Release Date: 9/27/2007 5:00 PM

B10-1

10/1/2007

B11**Jen Daugherty**

From: Megan Becker [becker.megan@gmail.com]
Sent: Friday, September 28, 2007 10:20 AM
To: Jen Daugherty
Subject: Comments on DEIR for SnowcreekVII

Dear Jen,

I am writing to express my concerns regarding the Draft Snowcreek VIII EIR. We have owned a home at Snowcreek V for 5 years and are a bit concerned about several aspects of this development. My greatest concern is the hotel. The plans for a large hotel (up to 8 stories) are currently inconsistent with the Town Development Code. A hotel of that size would greatly impact public views, as well as views of residents in and around the area. Although I am not in favor of building the hotel at all, I would have fewer objections if it was kept to a reasonable height and remained consistent with the current Town Development Code. I am wholeheartedly against the Zone Code Amendment. The protection of scenic areas and scenic resources is something precious to all of us who own homes in Mammoth and to everyone who visits as well.

We were aware of the golf course and some other development plans at Snowcreek, but a large hotel was not part of those plans and will certainly affect the views in our area. The report states that the **“cumulative impacts with respect to scenic resources and existing visual character would be significant and unavoidable”**. Views of the Sherwins and White Mountains are of particular concern, as well as views from all the hiking and biking trails in the area.

I believe that the goals for this development could still be met while remaining consistent with current codes. **The height of the hotel should be limited to 2 or 3 stories, without exception. And the Town’s Zoning Code should not be amended to allow for taller buildings.**

My other main concern is regarding the “significant and unavoidable” impact of light and glare. I would strongly urge the developers to limit the lighting as much as possible while maintaining safety standards. The “dark skies” are valued by all of us and should be maintained to whatever extent possible.

Thank you for your consideration.

Sincerely,

Megan Becker
 Homeowner, Snowcreek V

*Megan Becker, Ph.D.
 Becker & Associates
 951-440-3657
becker.megan@gmail.com*

Educating Physician and Patient Communities

No virus found in this incoming message.
 Checked by AVG Free Edition.
 Version: 7.5.488 / Virus Database: 269.13.33/1034 - Release Date: 9/27/2007 5:00 PM

9/28/2007

B11-1

B11-2

Terri McCracken

From: Jen Daugherty [jdaugherty@ci.mammoth-lakes.ca.us]
Sent: Monday, October 01, 2007 11:21 AM
To: GSandvig@kanzakiusa.com
Cc: Jeffrey Mitchell; Bill Taylor; Terri McCracken
Subject: RE: FW:

B12

George Sandvig,

thank you for clarifying. I did receive your letter dated September 24, 2007. This letter includes a question regarding how many people will be visiting different areas of Snowcreek VIII. This letter will be addressed as a formal comment letter on the Draft EIR and will be responded to in the Final EIR. However, please look at Table F of Appendix J of the Draft EIR. This table identifies the generation rates for the various components of the Snowcreek VIII Project. Although it does not give number of people, it does separate the different uses.

Hopefully this helps. If you have more detailed questions on traffic, I will direct you to the project engineer, Jeff Mitchell 760-934-8989 x258.

Sincerely,

Jen Daugherty
Assistant Planner
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546
Ph: (760) 934-8989 x260
Fax: (760) 934-8608
jdaugherty@ci.mammoth-lakes.ca.us

From: GSandvig@kanzakiusa.com [mailto:GSandvig@kanzakiusa.com]
Sent: Monday, October 01, 2007 8:17 AM
To: Jen Daugherty
Subject: Re: FW:

Jen,

Sorry, i did not include my name. I thought it was in the header of the e:mail. Yes I sent you another follow up to your list of mitigation efforts by Snowcreek VIII. Given these efforts I still feel the number of people at these facilities on many busy weekend will back up Old Mammoth Road for more than 33 seconds. I asked for the number of people that will be at the various sites when this study listed the number of cars and wait time at the intersection of Old Mammoth road and Fairway Dr..

Respectfully

George Sandvig

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.36/1041 - Release Date: 10/1/2007 10:20 AM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.36/1041 - Release Date: 10/1/2007 10:20 AM

10/2/2007

October 1, 2007

Jen Daugherty
Assistant Planner
Town of Mammoth Lakes
jdaugherty@ci.mammoth-lakes.ca.us
(760) 934 8989; FAX (760) 934 8608.

RE: 2006 Revised Snowcreek Master Plan

Dear Ms. Daughtery,

Thank you for allowing us to voice our concerns and opinions. As others will undoubtedly share our views, we hope that some modifications to the Master Plan can be carried out.

B13-1

Our major concern about Mammoth is density.

It would appear that the master plan for future Snowcreek VIII development represents dramatic over development. We know that many would like to see Mammoth grow, for air service to begin and for property values to increase in the long term, but if development is to occur, it needs to be well conceived and well balanced.

When we drive around Mammoth and see all the land that is destined for development, it concerns us that if each new developer is allowed to construct high-density, multi-floor properties, Mammoth is going to cease to be the sort of ski area that will prosper in the future. This is true for the Minaret/203 corner, for the Ocean Harvest area, for Snowcreek VIII, and more. If Chadmar is allowed to go through with all of their plans, they will set a precedent for high-density development that will ultimately be a *disaster* for Mammoth Lakes in every sense of that word. As residential owners who are unfamiliar with the procedures for considering master developments and city planning of this type, we can only hope that the Chadmar Master Plan is an example of asking for a mile in order to be given an inch.

B13-2

We elected to buy into Mammoth because it was not over built. (We've experienced Park City/Deer Valley when it feels like vacationing in a suburb of Los Angeles with ski runs.) We also bought into Mammoth because we looked forward to air service, new restaurants, a village and the like.

B13-3

While progress can't be stopped, development is always a concern, because it represents the unknown. From a positive point of view, it appears as though the Chadmar plans will

B13-4

create a Snowcreek VIII development that is at least tasteful in building design. But, we would hope that the Snowcreek VIII plans could be scaled down to a reasonable density, not only for the good of us owners in the Phase V area, but for the good of the whole town. As already said, a proper precedent needs to be set.

B13-4
(cont'd)

Sincerely,

Debra and Steven Werner
Snowcreek V, units #810 and #945

Some extra concerns and requests.

1. If there is to be a hotel in the new Snowcreek phase, it would be better to position it near old Mammoth Road, rather in the proposed location where it encroaches on the scenery of the Sherwins. Why put such a commercial development at the farthest point from the main road. In short, position the commercial building on the commercial road.
2. As Phase V owners, we are unclear as to how Fairway Drive access to Phase V will be handled during the years of construction and we are opposed to the proposed repositioning of the access road overall. We would prefer that the existing Fairway Drive be left in place, so that access to Phase V didn't involved driving a more circuitous route through all the new development of "apartment" condos. We purchased in properties in Phase V because of the openness of the approach to the development. On the part of Chadmar, it would be the courteous thing to do to maintain the ambiance of Fairway Drive for the existing Phase V owners, as it will be enough to weather the construction inconvenience, and suffer the loss of privacy due to the adjacency of a major build-out next door.
3. We are concerned about the plans for public or shuttle transportation related to future Snowcreek development. Will there be any mandated provisions for transportation to the ski slopes for all the thousands of owners/guests that could occupy such a major high-density development?
4. In terms of density, we would like to know what the maximum head-count would be for this community. The proposed hotel is mentioned to have 400 guest suites. What constitutes a suite? How many are one bedroom, two bedrooms or more? Assuming four guests per suite, such a hotel could accommodate 1600 guests at one time. Further, if there will be 850 residences (650 to 3500 square feet) that could represent thousands of owners/guests and hundreds of cars at any one time. The "8-35 units per acre" is an ambiguous measurement.

B13-5

B13-6

B13-7

B13-8

Jen Daugherty

From: Marc Siddens [msiddens@yahoo.com]
Sent: Tuesday, October 02, 2007 1:25 PM
To: Jen Daugherty
Subject: Snowcreek VIII Draft EIR

Hello Jennifer,

I'm writing you in response to the Snowcreek VIII Draft EIR. I've got to say that I'm really disappointed with some of the changes proposed in this project. As a frequent visitor to both the town and area, I think you are running the risk of dramatically changing the landscape, making it less appealing to professionals such as myself. I drive and/or fly the extra distance from the San Francisco Bay Area MANY times, passing Sierra locations much closer in the process. The changes outlined would flat out make me reconsider that decision.

I come to Mammoth for the both the surrounding facilities and scenic beauty, along with the proximity to activities I appreciate and enjoy. I do consider some of these amenities as a plus but there is a fair and reasonable way to accomplish them. Putting a high story hotel on the edge of town is not reasonable. I urge you to reconsider the choice and push for a compromise keeping in mind the spirit of the area.

Thanks,
marc siddens

To understand the heart and mind of a person, look not what he has already achieved, but what he aspires to.
-Kahlil Gibran

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.39/1044 - Release Date: 10/2/2007 11:10 AM

Jen Daugherty

From: David Snow [davidsnow@yahoo.com]
Sent: Tuesday, October 02, 2007 9:18 PM
To: Jen Daugherty
Subject: Snowcreek VIII Draft EIR

Dear Ms. Daugherty,

I just heard about the proposed 8 story hotel proposed to be built in Mammoth and heard that you were the person to whom comments should be sent.

Over the past few years, my family and I have stayed at Snowcreek in all seasons. We live in the SF bay area and love Mammoth as an alternative to the overbuilt Tahoe area. I understand the desire to further develop the area, but I urge the city to grow while maintaining the charm of Mammoth. I hope that the city enforces the current regulations and limits the hotel to a reasonable size.

Regards,

David Snow

Fussy? Opinionated? Impossible to please? Perfect. Join Yahoo!'s user panel and lay it on us. http://surveylink.yahoo.com/gmrs/yahoo_panel_invite.asp?a=7

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.13.39/1044 - Release Date: 10/2/2007 11:10 AM

B15-1

Jen Daugherty

From: Tricia McKinney [Tricia@otldesign.com]
Sent: Saturday, October 06, 2007 9:27 AM
To: Jen Daugherty
Subject: Please don't build a huge hotel at Snowcreek!

Hello Jen,

I'm writing you about the Snowcreek VIII Draft EIR. I visit Mammoth frequently and always rent at Snowcreek V. I recently found out that there is a 8-story hotel that is being proposed to be built. I was quite unhappy to hear this news. I'm requesting that the town enforce the current regulations of limiting the hotel size to a two or three story structure.

This will help preserve the beauty of the natural landscape that I have grown to love on my visits to Snowcreek.

Respectfully,
Tricia McKinney

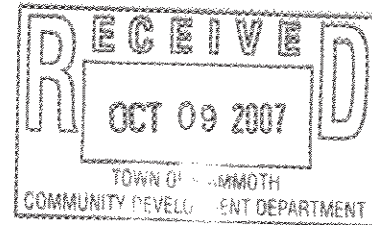
No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.14.4/1057 - Release Date: 10/8/2007 9:04 AM

B16-1

B17



Dear Jen Daugherty,
Enclosed are my comments and concerns for the
Snowcreek 8 development.
Thankyou,
Jane Kenyon

Snowcreek 8 DEIS comments:

VIEWSHED

No variances please, to preserve the viewshed for all.
Please no commercial development in the Mammoth Meadow
viewshed.

No commercial sprawl into the meadow viewshed that
would disrupt the views that visitors and residents
look at daily.

Set the buildings far enough back like Snowcreek 5 so
the public doesn't lose this very important viewshed.
Tourists and residents come to Mammoth for the views
of mountains, nature, open skies and stars. Many
tourists are not hikers and skiers, and enjoy the
views from town.

Keep the buildings 2 story/35 feet so the town of
Mammoth Lakes can retain its viewshed of the Sherwin
Mountains, the John Muir Wildernerss Peaks, Mammoth
Rock, and Mammoth Crest.

Keep the light pollution down so the public doesn't
lose the exceptional resource Mammoth has to offer
which is stargazing over the Sherwin Mountains, and
the unique Milky Way Galaxy views. To allow the
sprawl of commercial development and highrise
development out into viewshed of the Mammoth Meadow
will compromise the unique, magnificent viewshed that
Mammoth has to offer its visitors, that visitors come
to see from all over the world.

Snowcreek 5 was built so it would not destroy the
viewshed. Snowcreek 8 should be built like that.
With 1250 more buildings added all the way up to Old
Mammoth Road, Mammoth will lose its charming vistas.
The sight of sprawling buildings is undesirable.

BIRDS

The best time for development disturbance in the
meadow would be in the Fall, or before May 15, to
minimize the impact to the Spring breeding Birds of
this meadow habitat.

The Migratory Songbirds specific to Mammoth Meadow,
migrate into the Mammoth Meadow by May to set up their
breeding territories as the shrubs become snowfree.

By midMay they have active nests, with hatchlings by
June. During June and July almost all Migratory
Songbirds throughout the Mammoth region are feeding
insects to their young hatchlings, nestlings, and
fledglings. To minimize the impacts to the Mammoth
Meadow breeding Songbirds, Mitigation Measure BIO-1c
should say that construction activities should be
scheduled outside of Migratory Songbird breeding
season May 15 to August 15.

Snowcreek 7 was successful in removing the habitat
before nesting season due to the pre-construction
nesting bird survey. I expect Snowcreek 8 will have
that done too, to protect our wildlife.

Working around nesting season and maintaining as much

B17-1

B17-2

B17-3

B17-4

native habitat as possible will help Mammoth to retain the biodiversity of birds specific to our region that residents and tourists enjoy seeing. Many tourists are excited to learn what birds we have here. Birding is a popular form of recreation. We'd be smart to try to retain some native habitat and clear land outside of nesting season, so that Mammoth will still have beautiful Birds for the joy of our residents and tourists to see and to help offset the sharp declines of many California bird species.

B17-4
(cont'd)

BELDING GROUND SQUIRRELS

The Mammoth Meadow should be surveyed for Belding Ground Squirrels before land clearing, as they have their young in dens underground in May. By June they appear above ground.

B17-5

DUSTCLOUDS

In June 1989 while working at Sierra Meadows Equestrian Center, we worked with huge dust clouds blowing towards us, as Dempsey cleared the meadow in June.

B17-6

Is there enough water to contain the dust clouds that will be created from all the land disturbance for Snowcreek 8?

Is there enough water for 1250 more buildings while in a drought cycle?

B17-7

Mammoth Meadow is already 1/3 filled in with continuous buildings. Hopefully we can keep at least 50% of the exceptional Mammoth Meadow views for the public. This development should not be allowed to take away the viewshed that is so important to Mammoth Lakes.

B17-8

Thankyou,

Jane Kenyon

934-0372

harmonyshaboo@gmail.com

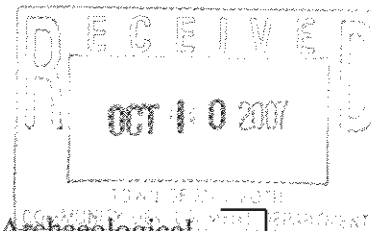
shaboosheba@yahoo.com

PO Box 814 ML 93546

Eastern Sierra Wildlife Care

CULTURE RESOURCES STUDY FOR THE SNOWCREEK VIII MASTER PLAN
MAMMOTH LAKES, CALIFORNIA
BURTON & FARRELL

Comments by Nancy Peterson Walter, PhD Mammoth Lakes, CA



In reviewing the material written by Burton and Farrell of Trans-Sierran Archaeological Research, December of 2006, I found a document that is well organized but is lacking in current or recent ethnographic material. Granted, most of the work done in this area is by anthropologists with a background in archaeology, there is work that has been done by ethnographers who have written material on the area as well as other scientists who have worked with local Paiute including but not limited to: Aldrich, J.M. 1912, 1921; Eldredge, I.F. 1923; Englehardt, George P. 1924; Miller, John and Wallace Hutchinson 1928; Patterson J.E. 1929; Simms Steven R. 1984; Warren, Dick 1963; Way, Guy S. 1920. When Catherine S. Fowler, PhD, an ethnographer at UNR and I wrote about Harvesting Pandor Moth Larvae with the Owens Valley Paiute in 1985 based on our work in 1981 we had no problems finding the above scientific references. All work done in the Mammoth Lakes area!

B18-1

There is material referenced in the HANDBOOK OF AMERICAN INDIANS, GREAT BASIN INDIANS Volume 1 about the Shoshone and Paiute of the Eastern Sierra and ethnographers who do continuing research are referenced. Dissertations have been written about the hunting of the pronghorn antelope; the relocation of the local Paiute and Shoshone to the current reservations; there has been linguistic work done in the Eastern Sierra; research has been done on the location of plant resources used; and there has been at least one master's thesis written dealing with historic photographs. None of this ethnographic material was referenced. Also not referenced is any mention of talking with the Paiute community who are still living in the Eastern Sierra – those in Bridgeport, Lee Vining, Benton, Bishop, Big Pine, Independence, or Lone Pine. Or to those who grew up or whose ancestors lived in June Lake or Mammoth Lakes. Many of these people still find food resources and materials for baskets just as their ancestors did in this area.

B18-2

B18-3

The most important site of cultural significance in the report is CA-MNO-3 a village site recorded over 50 years ago. This site is referenced as large and significant with a great potential for subsurface material as well as for buried historic material. Despite what has happened across the road to the north, the specific area relevant to this report, this is still true and before construction there are several factors to consider so that the loss of material that has happened in one area does not occur in this remaining area. The report also mentions that the area "... with dense prehistoric cultural deposits and midden soils, should be preserved, capped, or subject to data recovery if construction proceeds in this area as proposed." (p iii) I cannot stress this point more strongly! I feel that data recovery is the least important since no excavation preserves for the future the cultural material that is present. There should be enough data available from the preliminary survey that more excavation is not necessary.

B18-4

The discussions of the vegetation, the fauna, and the paleoclimate are well done but as mentioned above, the cultural context is incomplete. The prehistory is well covered but the ethnography is not up to date other than what "used to be." There is current or recent work being done that should have been part of the research. The comment that "...most important cultural deposits {are} located north of Old Mammoth Road." on page 14 is of interest since most if not all of that location is no longer available for research or preservation.

B18-5

When reviewing cultural resource reports for Los Angeles and Ventura Counties I often found that 20 to 30 meter intervals was not sufficient for areas when there was a dense area of cultural material visible on the surface as is mentioned on page 18.

B18-6

I was shocked that the report found there was no data recovery done for the area mentioned on page 20 when the two ornamental ponds and the construction of the rental office was done. This area was an area of known cultural significance yet no mention of monitoring and no mention of test pits in an area that Leonard (1974) had recommended as a preserve as well as an area that Burton and Farrell (2006) indicate "...that there are still substantial prehistoric and possibly historic cultural materials..." if work did not follow recommended procedure in the past how can we be assured it will in the future?

B18-7

I do not feel the Summary of Environmental Impacts & Mitigation Measures is adequate, since we now have our new General Plan, enforcement of it could still be questionable. There is still some room for value judgments and while scientific data is open to interpretation, it is important that mitigation measures be followed and enforced. The past record here in Mammoth Lakes has not always had the necessary follow through that is important. It is rather upsetting to find out artifacts were taken home by workers via an overheard conversation at a Lee Vining football game even if it may or may not be true. There is a definite need for contractors as well as staff, planning commission, and location workers to be made aware of the laws that apply to cultural resources. I would strongly stress the need for a workshop on this issue to avoid problems before they happen.

B18-8

It should be clear that mitigation measures must apply to ALL the project area including the golf course and other auxiliary facilities such as a store, interpretative center and outfitter buildings. Monitors must be hired to oversee all intrusions into the earth and have the power to stop work if necessary. What anthropologists see as a feature may not look like a feature to construction workers or a work boss. There are times when a project of this importance may require consultation with other anthropologists who work in the area and are familiar with the various types of habitation, variety of sites, differences of work areas as well as material that may be from Queen, Bodie, or Casa Diablo sources.

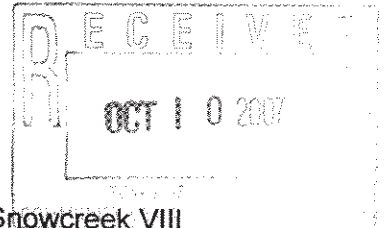
B18-9

Bill! the site is still eligible for NRHP!

B18-10

October 10, 2007

**Comments on Snowcreek VIII Master Plan DEIR
by Snowcreek V, Fairway Homes II HOA**



Ladies and Gentlemen:

Homeowners of Snowcreek V are certain to be impacted by the proposed Snowcreek VIII project, and the Fairway Homes II HOA, which represents 145 residences, would like to express some of our questions and concerns on the DEIR. (For background, Snowcreek V consists of 295 residential units, 150 of which are in Fairway Homes I HOA, and 145 of which make up Fairway Homes II HOA.) Fairway Homes I will be submitting a letter with their questions and concerns, which are similar to ours. Fairway Homes II has hired 2 experts on Land Planning and on Hydrology, to review and comment on the impact of this plan on Snowcreek V. Their comments are incorporated below and will be provided in more detail by Oct 22nd.

Our most important concerns are:

- Preserving the quality of life that we currently experience as Snowcreek V residents during the construction period and afterward, especially in light of the nine (9) Class I significant and unavoidable impacts, and
- The handling of the water movement and runoff from the Snowcreek Meadow, assuring that this construction not only does not add to the problems already being experienced by the Snowcreek V residents but also finally rectifies the drainage problems of the entire meadow.
 - To understand this issue, the commission should know that each homeowner of Snowcreek V has been assessed between \$10,000 and \$30,000 during the past two years as an initial effort to correct problems resulting from inadequate planning or execution of the hydrology plan for Snowcreek V.

The Snowcreek VIII Master Plan Update Draft EIR indicates that the project results in nine (9) Class I, significant and unavoidable impacts; six (6) Class I impacts in the area of aesthetics; two (2) Class I air quality impacts; and one (1) Class I impact to the Town's cumulative water supply.

Further, the project is inconsistent with several of the Town of Mammoth plans and policies related to aesthetics/visual impacts. A negative precedent is set if the Town of Mammoth approves of a project which is inconsistent with several of its own General Plan and land use policies.

Specific concerns with the Snowcreek VIII, Master Plan Update DEIR are as follows:

1. **Aesthetic/Visual Impacts:** Approval of the project will result in six (6) Class I impacts to aesthetic resources. Most significant of these impacts is that the proposed height of structures will obstruct important public views and scenic vistas. For Snowcreek V, the view shed of the southern residences, which include both the Sherwin and the White Mountains will be negatively impacted. The 400-unit hotel and private residences are proposed to be 120-feet in height, greatly exceeding the Town's 35-foot height restriction. Amendment of the Town's zoning code would be required to approve of the project height. The proposed height of structures results in significant and unavoidable impacts, which violate several of the Town policies. A 120-foot

structure in the proposed location would not be compatible with the surrounding development and would severely impact the view corridors and important scenic view sheds. We believe that an alternative could be found which reduces the height of the hotel and private residence structures to more reasonable building heights.

2. Project Specific and Cumulative Air Quality Impacts: The project results in Class I impacts to Air Quality. As the DEIR indicates, the generation of PM10 emissions (particulate matter) as the project is built will have significant project specific and cumulative impact to the community. Since the project will not be completed until the year 2017, these should not be considered "short-term" impacts to the community. If the project was reduced in density, air quality impacts could be reduced.

Additionally, we do not feel the proposed mitigation measures for this environmental impact are extensive enough. In regards, to mitigation (h) our recent experience with the temporary grading permit to move dirt on the discussed site has been that the construction traffic drives at high rate of speed that is extremely unsafe for a very narrow and curving road. We ask that a mitigation measure of a separate construction road from the road into the Snowcreek V be required.

In regards to point (l), the proposed project is in a natural "wind corridor" and it should be expected that the wind will frequently exceed 25 mph; hence, we feel this area requires stronger measures to reduce blowing dirt as it will be a usual rather than unusual event.

3. Hydrology and Water Quality (Drainage Pattern Alteration): It is essential that this impact be reclassified as Class I. Until the existing surface and subsurface drainage impacts are addressed, as they were supposed to have been according to the 1984 Kleinfelder EIR, it is technically impossible to address the proposed retention basins impact on the environment. This includes but is not limited to flooding, excessive runoff and erosion, impact on surface water and groundwater, potential impact to subsurface structures and potential surcharge to the existing under designed and inadequate drainage and retention systems currently impacting and damaging the structures in the Snowcreek V property. We certainly have the right to ensure that this Project does not exacerbate the already very serious problem of excessive moisture and inadequate drainage throughout Snowcreek V.
4. Cumulative Water Supply Impacts: The DEIR indicates that the project results in a Class I, cumulative impact to the Mammoth Community Water District. Please require that the applicant adhere to mitigation measure that phases development commensurate with available water supplies. Even with this mitigation, a significant and unavoidable impact to the water supply is anticipated with full build-out of the Master Plan and other planned projects. How does the Town propose to supply this and other projects with water, as well as ensure that existing development has adequate water supply in the future?
5. Noise: We disagree that the mitigation measures are adequate for noise abatement during the construction process simply by complying with the town ordinance regarding hours of operation. For example, a property that is only 100 feet from the construction site (as described in the DEIR) who experiences constant noise from 7AM to 8 PM, Monday through Saturday, will be an unhappy citizen, indeed. Especially those waking up to tractors and dirt movers at 7AM while on vacation. It

has the potential to harm our quality of life as well as our property values. We suggest that a monitoring and dispute resolution system be agreed to between the town and the builder.

6. **Public Services (Snow Removal):** While the statement is true that this project would not impact the Town's snow removal, we are requesting that the EIR address how it will impact Snowcreek V's snow removal and snow storage. Currently, Snowcreek V's snow storage is extremely inadequate as the original developer stored snow on the undeveloped land of the proposed Project.
7. **Recreation:** It is our understanding that the Mammoth Lakes Trails and Public Access is preparing a report on the recreational impact of this Project. We will withhold our comments until the report is completed and reviewed.
8. **Transportation/Traffic:** The DEIR proposes to reroute road access to Snowcreek V through what will be a construction zone for many years, and then through this dense development. If you drive down the current access road at any time and you will see residents with their families and pets walking, running, and on their bikes going into town. This is consistent with the Town Vision of promoting non-motorized transportation, and would be made much more difficult and less appealing if rerouted through the Snowcreek VIII development. We ask that a separate, efficient access road to Snowcreek V should be maintained and Snowcreek V should be connected to the walking and biking trails planned in Snowcreek VIII. As mitigation for the disruption and congestion forced upon Snowcreek V residents, and to further minimize the town traffic impact, the Red Line bus route and Snowcreek VIII shuttles should include stops at Snowcreek V.
9. **Utilities and Service Systems (Waste Generation):** Snowcreek V has already had wastewater problems and we ask that this plan ensure that Snowcreek V is connected to the city facilities separately from Snowcreek VIII.
10. **Construction Related Impacts:** The DEIR does not adequately quantify the construction related impacts of the project. Full build out of the project will not be realized until the year 2017. Ten years of construction should not be considered "short-term" impacts to the community. This is a long time for the community to be subject to construction noise, dust and traffic from the proposed project. A reduced density project would result in a shorter construction duration and less of these impacts.
11. **Alternatives:** We believe that the Alternatives Section does not provide a "reasonable range" of alternatives intended to reduce the impacts of the project. The DEIR indicates that Alternative C is the Environmentally Superior Alternative. Alternative C reduces the residential component significantly and eliminates the hotel/retail and expansion of the golf course project components altogether. Since Alternative C does not provide some of the beneficial project impacts (i.e., golf course, hotel bed tax, etc.) and does not meet the objectives of the project, the Town is not likely to approve of this alternative. The EIR consultant should analyze an additional reduced density alternative, which reduces the density, but still realizes the majority of the project objectives. This alternative would include all the components of the proposed project, but at a reduced density and scale. The intent of this reduced density alternative would be to lessen the visual impacts, eliminate the need for an amendment to the Town's zoning code (height restriction) and reduce overall construction related

impacts that result from the proposed project. This reduced density alternative would reduce all of the impacts and still meet the objectives of the project, which is the intent of the Alternatives section according to the CEQA guidelines.

12. We ask that the town require mitigation monitoring to ensure that the proposed mitigations are effective. The Town should be responsible for mitigation compliance, or hire an outside consultant to ensure that the mitigations proposed for this project are in place and effective. A monitoring component should be in place for the duration of project construction and beyond in some instances (i.e., biological resource monitoring).
13. We support the project's inclusion of the 80 units of work-force housing.
14. We support the mitigation measure, which requires that the residential component of the project be constructed only as the market demands it.
15. We support the requirement that project components can only be developed if there is adequate water supply to support the proposed use.
16. We appreciate Chadmar's time and efforts to design a project with the intention of blending into our rural setting, and promoting the active outdoors lifestyle of our community. Certainly, our positive experience with the completion of The Lodges promises the continuation of a desirable Alpine community that will enhance the value of Mammoth town and its environs. We hope to cooperate with the builder to the completion of this ambitious project.

We ask that the DEIR be revised to address the above issues.

Sincerely,

Lauren Hipp on behalf of the Snowcreek V, Fairway Homes II HOA Board

Jack Oswald, President

Ron Caird, Vice President

Ted Stern, Secretary

York Sutch, Treasurer

Lauren Hipp, Member at Large

B20**Jen Daugherty**

From: Jeff Warwick [surfmammoth@yahoo.com]
Sent: Thursday, October 11, 2007 5:52 PM
To: Jen Daugherty
Subject: Snowcreek VIII - DEIR comments

TO: Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty, Associate Planner

Please include the following comments regarding the Snowcreek VIII Draft EIR

- The Snowcreek VIII development is the only proposed project which literally REMOVES EXISTING PUBLIC AMENITIES AND BENEFITS from our town and community. I am strongly opposed to the fact that as a result of this development, our community will no longer have a DRIVING RANGE to use and enjoy. The driving range is a major public amenity, which is heavily frequented by both locals and visitors alike. This loss of a popular and already existing town amenity is NOT acceptable - nor is it acceptable to replace the existing driving range with a "practice area" in which you hit golf balls into a net 10 feet away.
- This development BLOCKS ACCESS TO OUR PUBLIC LANDS. Access to and from the Sherwin Range is another major PUBLIC AMENITY that is being REMOVED or SEVERELY LIMITED by this project. The proposed location of the "Outfitter's Cabin" is completely unrealistic - it's location is hundreds, if not thousands of yards away from the existing trailheads, Lost Lake, Sherwin Meadows, and the Public Lands at the base of the Sherwin's.

B20-1

B20-2

All developers are required to provide "community benefits" when building in Mammoth. I am not opposed to the development, however once built it will have literally REMOVED and/or DIMINISHED TWO MAJOR AMENITIES that currently exist within our Town. This loss takes value away from the entire community and should not be allowed to continue as it is currently planned.

B20-3

Thank you.

Sincerely,

Jeff Warwick
50 Monterey Pine Rd.
Mammoth Lakes, CA 93546
760.914.3000

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.14.8/1063 - Release Date: 10/11/2007 9:11 AM

10/15/2007

B21**Jen Daugherty**

From: BILL CROSBY [bcrosby@qnet.com]
Sent: Friday, October 12, 2007 8:35 AM
To: Jen Daugherty
Subject: SNOWCREEK VIII DRAFT EIR

TO: Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty, Associate Planner

Please include the following comments regarding the Snowcreek VIII Draft EIR

- The Snowcreek VIII development is the only proposed project which literally REMOVES EXISTING PUBLIC AMENITIES AND BENEFITS from our town and community. I am strongly opposed to the fact that as a result of this development, our community will no longer have a DRIVING RANGE to use and enjoy. The driving range is a major public amenity, which is heavily frequented by both locals and visitors alike. This loss of a popular and already existing town amenity is NOT acceptable - nor is it acceptable to replace the existing driving range with a "practice area" in which you hit golf balls into a net 10 feet away.
- This development BLOCKS ACCESS TO OUR PUBLIC LANDS. Access to and from the Sherwin Range is another major PUBLIC AMENITY that is being REMOVED or SEVERELY LIMITED by this project. The proposed location of the "Outfitter's Cabin" is completely unrealistic - it's location is hundreds, if not thousands of yards away from the existing trailheads, Lost Lake, Sherwin Meadows, and the Public Lands at the base of the Sherwin's.

B21-1

B21-2

All developers are required to provide "community benefits" when building in Mammoth. I am not opposed to the development, however once built it will have literally REMOVED and/or DIMINISHED TWO MAJOR AMENITIES that currently exist within our Town. This loss takes value away from the entire community and should not be allowed to continue as it is currently planned.

B21-3

Thank you.

BILL CROSBY
800-238-1255
760-914-1870 cell
760-924-0250 fax

<mailto:bcrosby@qnet.com>
www.mammothrealestate.com

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.14.8/1066 - Release Date: 10/12/2007 11:10 AM

10/15/2007

B22**Jen Daugherty**

From: Bob Laskey [r_laskey28@roadrunner.com]
Sent: Friday, October 12, 2007 9:51 AM
To: Jen Daugherty
Subject: Snowcreek VIII Draft EIR

TO: Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty, Associate Planner

Please include the following comments regarding the Snowcreek VIII Draft EIR

- The Snowcreek VIII development is the only proposed project which literally REMOVES EXISTING PUBLIC AMENITIES AND BENEFITS from our town and community. I am strongly opposed to the fact that as a result of this development, our community will no longer have a DRIVING RANGE to use and enjoy. The driving range is a major public amenity, which is heavily frequented by both locals and visitors alike. This loss of a popular and already existing town amenity is NOT acceptable - nor is it acceptable to replace the existing driving range with a "practice area" in which you hit golf balls into a net 10 feet away.
- This development BLOCKS ACCESS TO OUR PUBLIC LANDS. Access to and from the Sherwin Range is another major PUBLIC AMENITY that is being REMOVED or SEVERELY LIMITED by this project. The proposed location of the "Outfitter's Cabin" is completely unrealistic - it's location is hundreds, if not thousands of yards away from the existing trailheads, Lost Lake, Sherwin Meadows, and the Public Lands at the base of the Sherwin's.

B22-1

B22-2

All developers are required to provide "community benefits" when building in Mammoth. I am not opposed to the development, however once built it will have literally REMOVED and/or DIMINISHED TWO MAJOR AMENITIES that currently exist within our Town. This loss takes value away from the entire community and should not be allowed to continue as it is currently planned.

B22-3

Thank you.

Bob Laskey
 949.395.6900
 r_laskey28@roadrunner.com

No virus found in this incoming message.
 Checked by AVG Free Edition.
 Version: 7.5.488 / Virus Database: 269.14.8/1066 - Release Date: 10/12/2007 11:10 AM

10/15/2007

B23**Jen Daugherty**

From: Malone-III, Edward E [edward.e.malone-iii@boeing.com]
Sent: Friday, October 12, 2007 9:08 AM
To: Jen Daugherty
Cc: paulbush@msn.com
Subject: SNOWCREEK VIII DRAFT EIR

TO: Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty, Associate Planner

Please accept comments regarding the Snowcreek VIII Draft EIR

- The Snowcreek VIII development is the only proposed project which literally REMOVES EXISTING PUBLIC AMENITIES AND BENEFITS from our town and community. I am strongly opposed to the fact that as a result of this development, our community will no longer have a DRIVING RANGE to use and enjoy. The driving range is a major public amenity, which is heavily frequented by both locals and visitors alike. This loss of a popular and already existing town amenity is NOT acceptable - nor is it acceptable to replace the existing driving range with a "practice area" in which you hit golf balls into a net 10 feet away.
- This development BLOCKS ACCESS TO OUR PUBLIC LANDS. Access to and from the Sherwin Range is another major PUBLIC AMENITY that is being REMOVED or SEVERELY LIMITED by this project. The proposed location of the "Outfitter's Cabin" is completely unrealistic - it's location is hundreds, if not thousands of yards away from the existing trailheads, Lost Lake, Sherwin Meadows, and the Public Lands at the base of the Sherwin's.

B23-1**B23-2**

All developers are required to provide "community benefits" when building in Mammoth. I am not opposed to the development, however once built it will have literally REMOVED and/or DIMINISHED TWO MAJOR AMENITIES that currently exist within our Town. This loss takes value away from the entire community and should not be allowed to continue as it is currently planned.

B23-3

Thanks,

Ed Malone

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.14.8/1066 - Release Date: 10/12/2007 11:10 AM

B24**Jen Daugherty**

From: Devin Ryerson [dryerson@pureprescriptions.com]
Sent: Friday, October 12, 2007 12:56 PM
To: Jen Daugherty
Subject: SNOWCREEK VIII

TO: Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty, Associate Planner

Please include the following comments regarding the Snowcreek VIII Draft EIR

- The Snowcreek VIII development is the only proposed project which literally REMOVES EXISTING PUBLIC AMENITIES AND BENEFITS from our town and community. I am strongly opposed to the fact that as a result of this development, our community will no longer have a DRIVING RANGE to use and enjoy. The driving range is a major public amenity, which is heavily frequented by both locals and visitors alike. This loss of a popular and already existing town amenity is NOT acceptable - nor is it acceptable to replace the existing driving range with a "practice area" in which you hit golf balls into a net 10 feet away.
- This development BLOCKS ACCESS TO OUR PUBLIC LANDS. Access to and from the Sherwin Range is another major PUBLIC AMENITY that is being REMOVED or SEVERELY LIMITED by this project. The proposed location of the "Outfitter's Cabin" is completely unrealistic - it's location is hundreds, if not thousands of yards away from the existing trailheads, Lost Lake, Sherwin Meadows, and the Public Lands at the base of the Sherwin's.

B24-1

B24-2

All developers are required to provide "community benefits" when building in Mammoth. I am not opposed to the development, however once built it will have literally REMOVED and/or DIMINISHED TWO MAJOR AMENITIES that currently exist within our Town. This loss takes value away from the entire community and should not be allowed to continue as it is currently planned.

B24-3

Thank you.

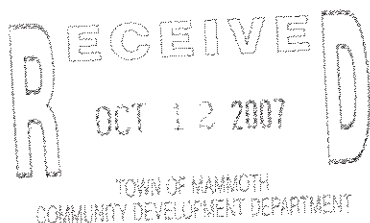
Devin Ryerson

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.14.8/1066 - Release Date: 10/12/2007 11:10 AM

10/15/2007



Snowcreek Fairway Owners Association
P.O. Box 5838 Mammoth Lakes, CA 93546

October 10, 2007

Town of Mammoth Lakes, Community Development Department
ATTN: Jen Daugherty
P.O. Box 1609
Mammoth Lakes, CA 93546

Re: Snowcreek VIII Draft Environmental Impact Report

Dear Ms. Daugherty:

The Draft Environmental Impact Report for Snowcreek VIII inadequately addresses a number of issues that the Snowcreek Fairway Owners Association find to be significant.

B25-1

The drainage plan for the proposed project needs to be critically evaluated in light of the existing drainage issues in Snowcreek V and the Snowcreek Golf Course. Damage to Mammoth Meadow caused by Dempsey Construction Corp. before and during the construction of Snowcreek V and the Snowcreek Golf Course has not been corrected as per agreement by Dempsey Construction. This fact has led to the flooding of Snowcreek V and Snowcreek Golf Course property during periods of high snow melt runoff. The additional surface water in the lower portion of Mammoth Meadow has led to increased ground water levels within the Snowcreek V property boundaries which further exacerbated the problems of fungal growth and dry rot under the Snowcreek V structures. The issues of drainage throughout the Mammoth Meadow area, including Snowcreek V, Snowcreek VIII and the Snowcreek Golf Course must be addressed before this plan is approved.

B25-2

The hotel structure is proposed to be 120 feet in height. This is significantly greater than the existing Town guidelines and will negatively impact the view to the east from Snowcreek V residences. This view was not addressed in the DEIR. We strongly recommend that the Town not allow this significant variance from existing Town policy.

B25-3

The density of the proposed development, while apparently within the limits set by Town policy, is very high for this area and will create significant traffic within the development. The proposed access to Snowcreek V property is through this highly trafficked area and will represent a significant reduction in access, both during construction and in the future. The maintenance and lighting of these roadways is crucial to the access to Snowcreek V property. This access can be mitigated by the provision of Town and Ski Area bus service to Snowcreek V property from the proposed Snowcreek VIII property.

B25-4

The access from Snowcreek VIII, and from Old Mammoth Road, to the Forest Service areas to the south and west, including Mammoth Meadow, are not adequately addressed. It is not sufficient to state that no pets will be allowed into the Forest Service areas. The Mammoth Meadow area is a prime area for residents to walk dogs. The

B25-5

proposed development plans must reflect the reality that owners and guests will walk their pets in the Mammoth Meadow area, and that they must have access directly from the proposed Snowcreek VIII site that does not force them to access the Meadow through Snowcreek V property. Thus, the plan should include a pathway from the Snowcreek VIII site across the proposed Golf Course extension between the green of # 18 and the tee of # 1, around Snowcreek V property to Mammoth Meadow, possibly following the existing roadway and avoiding the Snowcreek V units in this area. This path will also provide access to the back country for skiers and hikers. Asking people to go around the Golf Course is not practical and will force the traffic to go through Snowcreek V property.

B25-5
(cont'd)

Because of the proposed high density, the removal of snow from the property will be difficult and expensive. Snow storage is not adequate for a development of this magnitude and should be considered thoroughly before this plan is approved. Under the current plan, trucking of snow from the property may be the only option and will further reduce access to Snowcreek V property during high snowfall periods.

B25-6

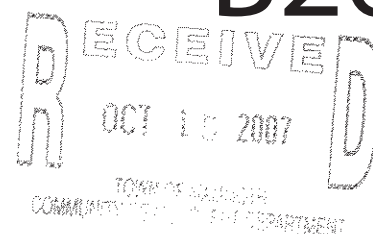
Regards,



Donald Collins, President
Snowcreek Fairway Owners Association
Board of Directors



B26



October 8, 2007

- ✧ Near Disneyland® Resort
- ✧ 150 RV Spaces
- ✧ Overnight / Long-term
- ✧ Pool/Jacuzzi
- ✧ Tiled Restrooms
- ✧ Concrete Patios
- ✧ Laundry
- ✧ Dump Station

Town of Mammoth Lakes
Planning Commission
P.O.Box 1609
Mammoth Lakes, CA. 93546

Re: Snowcreek VIII DEIR

By email and postal service.

Dear Planning Commissioners:

The Draft EIR for Snowcreek VIII has inadequately addressed a number of issues. As an owner in Snowcreek V, a 30 plus year homeowner in Mammoth and a former Planning Commissioner in the City of Anaheim, I would like to bring to your attention some of these issues.

B26-1

The density of the proposed development, while within the Towns policy, is extremely high for the meadow area. I quote from your 2007 General Plan update, the Community Vision of *"protecting the surrounding natural environment and supporting our small town atmosphere by limiting the urbanized area. and Exceptional standards for design and development that complement and are appropriate to the Eastern Sierra Nevada mountain setting and our sense of a "village in the trees" with small town charm"*. This plan does not address fully those visions nor the Land Use goals stated therein.

B26-2

The proposed density through this highly trafficked area will represent a significant reduction in access, not only during construction but also impacting the area in the future. The intersection of Old Mammoth Rd. and Minaret will be highly impacted. The proposed hotel even with Town transportation serving it will add to that areas congestion. Chadmar's proposal utilizing the term "stacked flats"- a term most often used in urban areas to alleviate the images of old, ugly tenement housing- does not address the high density issue, merely making it sound better.

B26-3

B26-4

The high density does not fully allow for adequate snow removal and stacking from the hotel and condos in the proposal. Do you stack it on the golf course or push it onto Forest Service land? Where is the *"plan for mobility, feet first, with a small town community character"*?

B26-5



- ✧ Near Disneyland® Resort
- ✧ 150 RV Spaces
- ✧ Overnight / Long-term
- ✧ Pool/Jacuzzi
- ✧ Tiled Restrooms
- ✧ Concrete Patios
- ✧ Laundry
- ✧ Dump Station

The General Plan community design states, “*Design the man-made environment to complement, not dominate, the natural environment*”? The hotel is proposed to be 120 feet in height, how does that fit the Towns design? Nowhere in the DEIR is the view from Snowcreek V taken into account. It would be very appropriate for the developer to put a static balloon at that height. Allowing the commissioners to obtain a ground level view of the scenery, which will be obscured at this height from all angles.

B26-6

Improper drainage from the Mammoth Meadow has resulted in serious mold damage to Snowcreek V. During construction of Snowcreek V and Snowcreek golf course property the meadow suffered significant damage, which continues to raise the ground water table during high run off years. The hotel and condos are proposed to have underground parking. The issue of drainage throughout the Mammoth Meadow area, including Snowcreek V, Snowcreek VIII and the golf course must be addressed before this plan is approved.

B26-7

There has been an ongoing struggle for access to the Sherwin’s and the Meadow during the ski season. A gate at the Ranch homes is a direct response to the situation. Nowhere in this document is access addressed. Since another of the General Plan goals is to “*link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes*”. I would suggest the developer create a trail around Snowcreek V to the Meadow area so a permanent access way would be opened for both skiers and hikers.

B26-8

Lastly, I would address the roadways in and through the complex. Chadmar is not willing to maintain the road and lighting coming into Snowcreek V. We would ask the plan include road access and maintenance. It should also contain a street lighting plan that enhances and complements the Meadow environment, while preserving the integrity of the night sky.

B26-9

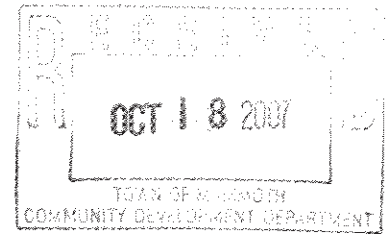
B26-10

Chadmar has listed their 5 options/choices for development of this property. You, as Commissioners, have the power to request a plan, which truly would beautify and enhance the Meadow, yet preserve the integrity and restrict overdevelopment.

B26-11

Sincerely,

Paul Bostwick
Snowcreek V #839 and Board Treasurer



October 17, 2007

Jen Daugherty
Community Development Department
Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, CA 93546-1609

Dear Jen:

Please find attached comments from the MLTPA Foundation regarding the Snowcreek VIII Draft EIR.

The comments have been prepared by Laurie Oberholtzer of Nevada City, CA, a consultant retained by MLTPA. The comments and attached exhibits, prepared by MLTPA, have been endorsed and have the full support of the Board of Directors.

Please let me know if you have any questions or if any of our materials require further clarification.

Best, and thanks for your time,

John Wentworth
President, MLTPA Foundation

cc: MLTPA Foundation Board of Directors
James Reed
Kim Stravers

B27-1

Laurie Oberholtzer
Environmental Planner
310 Nevada St.
Nevada City, CA 95959
(530) 265-5433 / (530) 265-8068 fax

October 13, 2007

Jen Daugherty
Community Development Department
Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, CA 93546-1609

Re: Snowcreek VIII DEIR Comments

Dear Ms. Daugherty:

I have been retained by the Mammoth Lakes Trails and Public Access Foundation (MLTPA) in commenting on the Snowcreek VIII Draft EIR (DEIR). Thank you for the opportunity to provide input.

MLTPA is concerned with the potential impacts of new development in the Mammoth Lakes area on existing and future trails and public access systems. MLTPA sees a distinct opportunity for all new development to maintain and enhance the Town's trails and public access system. MLTPA's comments on this DEIR will speak to these concerns.

B27a-1

The organization is pleased that the DEIR includes a section on recreation impacts (Section IV), in particular a discussion of potential impacts to trails (Impact REC-3, page IV.L-10, last paragraph). However, the trails discussion is extremely brief (one paragraph in a 600-plus-page document) and concludes that impacts will be less than significant. MLTPA believes that when the trails subject is researched and discussed more fully, it will be obvious that the project could result in significant impacts. They provide additional information below that clearly was not available to the consultant during preparation of the DEIR. MLTPA requests that this information be forwarded to the consultant and included in the FEIR. They also propose mitigation measures.

B27a-2

MLTPA offers these comments from their area of expertise. MLTPA is the recognized authority on trails and public access issues in the Mammoth Lakes area. From its inception, the organization has been a leader in the research and discussion of these issues. MLTPA participated in the Sensitive Lands and Open Space Resources Committee, the 2007 General Plan Update via public comment and as a member of the Community Stakeholders' Group, serving with the Snowcreek VIII applicant, and in the last year initiated MLTPA CAMP

B27a-3

(Mammoth Lakes Trails and Public Access Concept and Master Planning), a multi-partnered, multi-jurisdictional effort (Town of Mammoth Lakes, Mammoth Mountain Ski Area, United States Forest Service) that has brought nationally recognized trail and outdoor recreation consultants to Mammoth Lakes to update existing trails planning. The MLTPA CAMP process has included significant partner financial contributions. The organization prepared the 2006 GIS Inventory Report on trails and public access points in the Mammoth Lakes area, and presented a Public Meeting and Strategic Conference in the fall of 2006 that attracted a standing-room-only crowd of close to 5% of the town's permanent population. The Town of Mammoth Lakes has recently adopted a Memorandum of Understanding with MLTPA and other partners, intended to further the efforts of trails and public access planning in the Mammoth Lakes area.

B27a-3
(cont'd)

CEQA Notes

(1) *The Discussion under CEQA Guidelines Section 15125 underscores the importance of the Environmental Setting section of an EIR. It reads: "Because the concept of a significant effect on the environment focuses on changes in the environment, this section requires an EIR to describe the environmental setting of the project so that the changes can be seen in context. The description of the pre-existing environment also helps the reviewer to check the Lead Agency's identification of significant effects."* MLTPA has pointed out that since the environmental setting discussion in the DEIR is minimal, the "check" must result in a determination that inaccurate impact conclusions have been made relative to trails and public access issues in the DEIR.

B27a-4

IMPACT EVALUATION CRITERIA

The impact evaluation criteria presented in the Recreation chapter of the DEIR are inadequate.

1. Include General Plan policies as trails impact evaluation criteria. A number of these policies are included in the Land Use and Planning chapter of the DEIR (pages IV.H-57 to 59). However, they are discussed in the context of land use impacts rather than recreation impacts. All 2007 General Plan policies related to trails and public access, and the wording in the Resort-R land designation text, should be included as trails and public access impact evaluation criteria. Use of these policies as criteria is consistent with CEQA's environmental checklist for significant impacts, which states that a proposed project would have a significant impact if it would: "*Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.*" Please note that Section 15064(i)(3) (A-E) of the CEQA Guidelines permits use of impact evaluation criteria standards such as the trails general plan policies. Clearly the trails policies meet each of the requirements (A-E) in this section of the CEQA Guidelines, including the fact that they were adopted for the purposes of environmental protection.

B27a-5

2. Include information on other Town adopted trails and public access policies and programs to provide interpretation of General Plan policies used as impact evaluation criteria. (1) The Town is actively implementing these General Plan policies with further actions that demonstrate the importance of trails and public access issues in the community. These additional policies and programs allow for accurate interpretation of the General Plan policies. It is clear that there is a relatively low threshold for adverse impacts to trails and public access in the community.

Examples of specific Town policy and regulating actions relative to trails and public issues include:

- Adoption of the Mammoth Lakes Trails and Public Access Memorandum of Understanding (October 7, 2007) between MLTPA and ten other groups and public agencies. The purpose of the MOU is to provide a *"collaborative planning process, directed toward the establishment and maintenance of a system of public trails providing reasonable access to and enjoyment of public lands that are both within and surround the Town."* A \$100,000 Town budget allocation also was contributed to the process. Clearly the development of the Snowcreek VIII project as proposed, eliminating substantial existing public access to federal lands, will preclude planning options that this publicly adopted process is intended to explore.
- Town Council rescission of a previous vote to evacuate a public easement on Ranch Road, and revocation of the road with deeded public pedestrian access. This overall action was the result of a community petition drive. Clearly, loss of public access as proposed by this project would be counter to Town Council precedent.

B27a-6

3. Use additional impact evaluation criteria from the CEQA significant impact checklist:

- Physical division of an established community.
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

B27a-7

MLTPA should note here that most of the trails and public access policy General Plan consistency conclusions listed in the DEIR are determined to be consistent with the project by the DEIR consultants. The organization feels that these conclusions are counter to the evidence above and that it presents in the Environmental Setting and Impact discussions later in this letter.

CEQA Notes

(1) and (2). Per CEQA Guidelines: "In determining whether an effect will be adverse or beneficial, the Lead Agency shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency." (CEQA Guidelines Section 15064c) The public view on the issue of trails and public access is clearly outlined in paragraphs 1 and 2 as evidenced by both adopted General Plan policies and further by adopted measures described in paragraph 2.

B27a-8

ENVIRONMENTAL SETTING

The DEIR is currently inadequate because it does not include adequate Environmental Setting discussion relative to trails and public access. The Recreation chapter's overall Environmental Setting section does not discuss existing trail locations (pages IV.L-1 to 2) and includes only a two-sentence discussion of the 1990 Parks and Recreation Element of the General Plan (page IV.L-5) as regulatory background.

B27a-9

The following background should be included in the FEIR to ensure that the Environmental Setting section adequately discusses trails and public access:

1. Include discussion of the public interest and wide public policy context of trails and public access issues as discussed under Item 2, under Impact Evaluation Criteria, above.

The community and Town Council interest in trails and public access issues, and resulting actions and programs that have resulted, are an important part of the Setting within which the Snowcreek VIII site is located.

2. Include list of the presence on and around the site of a number of specific trails and access points. The site has been used traditionally by the public to access federal lands in the winter and summer, both through the site and along the entire perimeter of the property. Because of its location on the edge of town, the site's status as an access point is particularly critical. The overall use of the site for pedestrian, bicycle, motorized, and cross-country ski access has been well documented in the MLTPA GIS Inventory Report dated September 7, 2007. It is clear that the site does not offer just a few specific access points but is a general access area, including:

B27a-10

Snowcreek VIII Site Existing
Pedestrian, Motorized Vehicle, Bicycle, and Cross-Country Ski Use

- Access to federal lands for a wide range of activities both winter and summer: hiking, mountain biking, cross-country skiing, 4-wheel drive and ATV use, backcountry camping.
- General access to Sherwin Creek Road for cross-country skiers along the southern perimeter, particularly the existing golf course southern edge.
- General access to Inyo National Forest along southern and eastern perimeter of site.
- General access across the site and existing golf course from existing subdivisions in Snowcreek V and VI to USFS lands, particularly in winter.
- Adjacent to Mammoth Lakes Trail System bike path along Old Mammoth Road.
- Crossed by 4WD road that leads to popular USFS areas including Kerry Meadow. Used in summer and winter.

- Winter terminus of Sherwin Creek Road and snowmobile staging location.

B27a-10
(cont'd)

ENVIRONMENTAL IMPACTS

The DEIR is inadequate because it reaches inaccurate conclusions as a result of lack of analysis of adequate information. (1)

B27a-11

MLTPA believes that the DEIR conclusion that the project will result in "less than significant" impacts on trails and public access must be revised to "significant" for the following reasons:

1. The original conclusion of "less than significant" was based on virtually no setting discussion relative to trails and public access. As described previously in this letter, the site acts as an important access area to surrounding federal lands along its entire border, not just one portal as proposed. This porous access to surrounding open spaces is an important part of the culture of the community that would be seriously altered by focusing access to one portal. In fact, the 2007 General Plan Goal P3 calls for an integrated trail system that will *"maintain and enhance convenient public access to public lands from town."* (Italics added.) To "maintain" the existing "convenient" access across this site necessitates maintaining access widely throughout and all along its border. To lose this porous access could provide a physical division (a potentially significant impact per CEQA) in this community, which is so connected to its surrounding federal lands; activity areas on these federal lands are considered a part of the Mammoth Lakes community.

B27a-12

2. The original conclusion of "less than significant" was based on no analysis as to the importance to the existing community and future residents of access across the site to federal lands and activity areas. This importance has been demonstrated by the documented historic use of the site to access federal lands. In addition, as discussed previously in this letter, the trails and public planning process that has been proceeding over a number of years in the community has demonstrated that the community is not interested in developing merely a set of defined trails, but also in maintaining its historic porous border to access federal lands. This resulted in the "Town Within a Park" concept cited in the General Plan, which illustrates the community's desire to avoid separation from surrounding forestlands. Finally, it is clear in the adopted General Plan policies related to trails and public access that future pedestrian and bicycle accessibility both internally and to federal lands in new developments is critical. The participants in the trails planning and General Plan update process understood that new residents expect to "buy in" to the historic accessibility that is a part of their new community.

B27a-13

3. The original conclusion of “less than significant” relative to trails and public access was based on no mention of the background context of the major interest via public participation that the community has shown in trails and public access issues over the years. This is described in MLTPA’s comments under Impact Evaluation Criteria, Item 2, earlier in this letter.

B27a-14

4. The original conclusions of “less than significant” relative to General Plan consistency on trails and public access policies throughout the various chapters of the DEIR were based on inadequate analysis as described in items 1-3 above and more specifically in the table below. These conclusions should be changed to “significant.”

B27a-15

Ultimately, it will be up to the Planning Commission and Town Council to make determinations on General Plan consistency prior to certification of the EIR. MLTPA requests that these policies be reviewed carefully by the decision makers. The organization is certain that when the consistency determinations are made with the full context of the background behind the adoption of the General Plan’s comprehensive package of trails and public access policies, it will be clear that the project is inconsistent with these policies in its present form.

In the table below MLTPA lists each of the General Plan policies relative to trails and public access, which were included in the DEIR. In all cases but one, the DEIR found the project to be consistent with the General Plan policies, which then resulted in a conclusion of “less than significant impacts.” In general, the DEIR cited the fact that the project proposes trails, sidewalks, bike paths, and an Outfitters’ Cabin as supportive of a General Plan consistency finding. However, these conclusions were made without benefit of the background setting information and regulatory context that MLTPA has included in this letter. It is MLTPA’s contention that the project is generally not consistent with these policies for the following reasons:

B27a-16

- The project application discusses these trails and access features only in general and in text form; no maps or details have been provided to ensure the extent of facilities or that they will be developed where access is needed. As a result, mitigation cannot be assured at this time. (1)

- Only one access point to federal lands is specifically proposed—at the Outfitter’s Cabin, which will not provide easy access to the Sherwin Range. Funneling public access would decrease the historic accessibility to the site’s publicly owned surroundings, resulting in a significant adverse impact by violating the many General Plan policies calling for an effective trails network and access to federal lands.

B27a-17

- The interpretation of these policies must be based on the intent behind them, which is documented in this letter and in more detail in the proceedings of many years of community meetings and hearings on trails and public access issues.

B27a-17
(cont'd)

**Recommended Changes to General Plan Consistency Conclusions
in DEIR (Various Chapters)**

General Plan Policy	DEIR Conclusion	MLTPA Recommended Conclusion
<u>1987 General Plan Policy 2C-1</u> <i>The Town shall establish an effective trails network which connects frequently used destinations and follows heavily traveled routes. Trails shall be established whenever possible: 1) along scenic routes, 2) between recreation and visitor nodes, 3) to public facilities, areas of cultural, educational, recreational and historic interest, and 4) to campgrounds, camping areas, forest and wilderness areas.</i>	Consistent. Because bike and pedestrian trails are proposed.	Inconsistent. Even though the project developer notes that the project will eventually include trails and access points to federal lands, they are not mapped. As a result, <u>there is no mitigation assurance at this time (1)</u> . In addition, the value of the site's historic accessibility is because the site provides access to federal lands and the multitude of destinations on those lands all across the site and along its entire perimeter in both winter and summer. Only one access point to federal lands is specifically proposed—at the Outfitter's Cabin, which will not provide easy access to the Sherwin Range. Clearly, the intent of this policy and other trails and public access policies was not to limit access points, but to recognize existing accesses used by the public and to protect and expand them. In this case, funneling public access to a few points would decrease the historic accessibility of the site surroundings, resulting in a significant adverse impact. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
<u>Policy 2C-5</u> <i>The Town may require new development and, to the extent feasible, existing uses which are redeveloping, to 1) provide non-motorized path easements to develop paths in conformance with an adopted non-motorized transit plan, 2) provide crosswalk striping, and 3) provide lighting for safe pedestrian use of paths.</i>	Consistent Because bike and pedestrian trails are proposed.	Inconsistent. See discussion under 1987 General Plan Policy 2C-1.
<u>2007 General Plan Policy P2B</u>	Consistent Because recreation	Inconsistent The most important recreational

B27a-18

Require useable public recreation open space in all master-planned developments.	facilities are proposed.	needs of the public on this site are trails and access. See discussion under 1987 General Plan Policy 2C-1. In addition, it has not been made clear in the project description how public the trails on the site will be and whether they will be public year-round. As a result, <u>mitigation cannot be assured at this time (1).</u>
Policy P3A Ensure public routes for access to public lands are provided in all developments adjacent to National Forest lands.	Consistent (Due to provision of Outfitters' Cabin access point)	Inconsistent. See discussion under 1987 General Plan Policy 2C-1. Again, the Outfitters' Cabin provides only one access point, greatly diminishing current access and inconvenient to the Sherwin Range.
Policy P3B Coordinate with multiple organizations, agencies, and jurisdictions to plan, steward, interpret, and sustain trails, public access, and outdoor recreation amenities in the Mammoth Lakes region.	Not discussed	Inconsistent It cannot be assured that the project will be consistent with the trails and public access planning project that is currently underway in the Town because it has not been adopted. The project as currently proposed would violate this policy since the coordination on the multi-agency trails project is well underway without Snowcreek VIII involvement.
Policy P3C Identify and acquire points of public access to public lands (from within the Urban Growth Boundary to surrounding public lands) through cooperative arrangements including easements, purchase, or other means of title acquisition.	Inconsistent DEIR: "The project applicant has proposed to provide a location for public access....which is outside the UGB. That access, while not as convenient as the current access point and routes, will be permitted and lawful and will be enhanced with the Outfitters' Cabin that will provide opportunities for persons entering those public lands to rent ski equipment and other sports equipment."	Inconsistent MLTPA agrees with the DEIR conclusion. However, the DEIR goes on to conclude that General Plan consistency impacts are <u>less than significant</u> since the project is consistent with "virtually all" of the General Plan policies (DEIR page IV.H-66.). <u>This impact conclusion must be revised to "significant"</u> since the project is clearly inconsistent with this policy and, as a result, the other closely related trails and public access policies as discussed throughout this table. In addition, the fact that only one policy is concluded to be inconsistent by the consultants is not relevant. This is a very specific, directive policy with little room for interpretation. Finally, it will ultimately be up to the Planning Commission and Town Council to make determinations on

B27a-18
(cont'd)

		General Plan consistency.
Policy P5B <i>Design and construct trails as components of a regional and local network for recreation and commuting.</i>	Consistent Because bike and trail systems are proposed.	Inconsistent See discussion under 1987 General Plan Policy 2C-1. In addition, since the trails and paths are not mapped, it is unclear if this policy will be well implemented. <u>Mitigation cannot be assured at this time (1).</u> The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
Policy P5C <i>Require development to incorporate linked trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.</i>	Consistent Because bike and pedestrian trails are proposed.	Inconsistent See discussion under 1987 General Plan Policy 2C-1. In addition, since the trails and paths are not mapped, it is unclear if this policy will be well implemented. <u>Mitigation cannot be assured at this time (1).</u> The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
Policy P5D <i>Design public and private streets not only as connections to different neighborhood districts, but also as an essential element of the open-space system and continuous recreation paths in design.</i>	Consistent Project subject to design review.	Inconsistent The ability of Snowcreek VIII to continue to allow historic public access widely across the site will require public access through the proposed housing areas linking to the open space and golf course areas. Since the trails and paths are not mapped, it is unclear if this policy will be well implemented. <u>Mitigation cannot be assured at this time (1).</u> The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
Snowcreek District Design Character (General Plan page 5): 4. Provide access and staging area to Sherwin Range and "community uses" accessible from Old Mammoth Road.	Consistent Largely due to unmapped trail proposals and the Outfitters' Cabin.	Inconsistent Since the trails and paths are not mapped, it is unclear if this policy will be well implemented. Substantially more parking than shown on the Concept Plan map would be needed to provide for the snowmobile staging that currently takes place. <u>Mitigation</u>

B27a-18
(cont'd)

		<u>cannot be assured at this time (1).</u> In addition, much emphasis is placed throughout the DEIR on the Outfitters' Cabin ability to substitute for the free access to federal lands currently afforded by the undeveloped site. Funneling access to this one location does not provide equal or adequate mitigation. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
C.2.G. Policy: <i>Ensure that development in commercial areas provides for convenient pedestrian movement between adjoining and adjacent properties.</i>	Not discussed	Inconsistent It has not been demonstrated that this will be provided as part of the Master Plan because it has not been mapped. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
C.2.R. Policy: <i>Plan parks for safety and compatibility with adjacent uses through thoughtful design, including location of buildings, lighting, parking, emergency access, public transit and pedestrian/bicycle access.</i>	Not discussed	Inconsistent It has not been demonstrated that this will be provided as part of the Master Plan because it has not been mapped. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
M.2.A. Policy: <i>Maintain and expand access to recreation areas via coordinated system of shuttle and bus services, scenic routes, trails and highways.</i>	Consistent Noted that bus shelters are proposed and Outfitters' Cabin will provide access to federal lands.	Inconsistent It has not been demonstrated that bus shelters will be provided as part of the Master Plan because they have not been mapped. In addition, much emphasis is placed throughout the DEIR on the Outfitters' Cabin ability to substitute for the free access to federal lands currently afforded by the undeveloped site. Funneling access to this one location does not provide equal or adequate mitigation. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.

B27a-18
(cont'd)

M.3.D. Policy: <i>Encourage visitors to leave vehicles at their lodging by developing pedestrian, bicycle, transit and parking management strategies.</i>	Consistent DEIR notes trails and bus shelters proposed and Outfitters' Cabin access.	Inconsistent In addition, much emphasis is placed throughout the DEIR on the Outfitters' Cabin ability to substitute for the free access to federal lands currently afforded by the undeveloped site. Funneling access to this one location does not provide equal or adequate mitigation. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
M.4. Goal: <i>Encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive.</i>	Not discussed	Inconsistent It has not been demonstrated that a trail system capable of fully meeting this goal will be provided since it has not been mapped. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
M.4.B. Policy: <i>Provide a high-quality pedestrian system linked throughout the community with year-round access.</i>	Consistent	Inconsistent It has not been demonstrated that a trail system capable of fully meeting this goal will be provided since it has not been mapped. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.
M.4.D. Policy: <i>Provide safe travel for pedestrians to schools and parks.</i>	Consistent	Inconsistent It has not been demonstrated that a trail system capable of fully meeting this goal will be provided since it has not been mapped. The system that has been proposed in the Concept Plan text is skeletal in nature compared to the current site accessibility and needs of future residents.

B27a-18
(cont'd)

5. Outfitters' Cabin does not provide adequate trails and public access impact mitigation and may be inconsistent with Town Open Space zoning. The DEIR (Chapter L) assumes that the Outfitters' Cabin will provide significant recreational opportunities and public access to federal lands, thus avoiding related significant impacts. This is incorrect. The Snowcreek VIII site currently

B27a-19

offers full access across the entire site and its full perimeter to existing Town residents and future project area residents. Funneling access to essentially this one point will greatly reduce access to federal lands. The Outfitters' Cabin "portal" will be located at the most distant access point possible from the site to the Sherwin Range. It will be a private facility, offering a different kind of experience than the porous access the community has historically enjoyed. Staging area parking will be reduced, and access across the site will be partially blocked by new homes and development areas.

B27a-19
(cont'd)

CEQA Notes

- (1) **Per CEQA Guidelines, evidence must be given within the EIR to demonstrate that the recommended mitigation measures are capable of:** (a) "avoiding the impact altogether by not taking a certain action or parts of an action"; (b) "minimizing impacts by limiting the degree or magnitude of the action and its implementation"; (c) "rectifying the impact by repairing, rehabilitating, or restoring the impacted environment"; or (d) "reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action." (CEQA Guidelines, Section 15370.)
- (2) **Per CEQA Guidelines: "An EIR must be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences."** (CEQA Guidelines Section 15151) In addition, there must be "substantial evidence" demonstrated to support a conclusion: "Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative...does not constitute substantial evidence....Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinions supported by facts." [CEQA Section 15384(a) and (b)] Also, in *Browning-Ferris Industries of California, Inc. v. San Jose* (1986) Cal. App. 3d 852, the court reasserted that an EIR is a disclosure document and as such an agency may choose among differing expert opinions when those arguments are correctly identified in a responsive manner. Throughout this letter, the organization believes that it has identified MLTPA expertise and presented substantial evidence to back up its conclusions. MLTPA also has pointed out accurately the fact that the DEIR does not provide adequate background information and analysis to constitute substantial evidence to back up its conclusions.

B27a-20

CUMULATIVE IMPACTS

The DEIR Cumulative Impacts Section Rec-4 (page IV.L-11) is inadequate for the following reasons:

- The DEIR Cumulative Impacts Section does not discuss trails and public access specifically,
- The DEIR Cumulative Impacts Section does not determine whether or not the projects on the cumulative projects list will implement Town trails and public access policies fully, and
- The Cumulative Impacts Section in the DEIR does not determine whether or not the Town's Development Impact Fee will specifically fund adequate trails and access projects.

B27a-21

RECOMMENDED MITIGATION MEASURES

The DEIR is inadequate because it proposes no trails and public access mitigation measures even though MLTPA has shown that project-related impacts will be significant. (1) The following mitigation measures would at least partially mitigate the impacts discussed above. Access to federal lands will still be substantially altered, and as a result residual impacts are still expected to be significant. However, these measures will reduce impacts to a great degree and should be added in the FEIR:

MLTPA Recommended Snowcreek VIII Trails and Public Access Mitigation Measures

The Snowcreek VIII Illustrated Conceptual Master Plan shall be redrawn prior to adoption of the 2007 Master Plan Update to include the features listed below (partially illustrated on the attached map) and incorporated into the conditions of approval and the development agreement of the current approval phase.

Perimeter Access to Federal Lands: All-Season Access

-Perimeter open space buffer of at least 30 feet in width (as indicated on attached map) with developed and maintained (Class 1 or better) signed public access multi-use trail on project land encircling the entire site area south and north of Old Mammoth Road, including portions of site that are adjacent to federal lands as well as behind existing and proposed homes. Fencing shall be removed along the federal lands perimeter or fencing breaks shall be provided every 200 feet.

-Final golf course layout shall be designed to minimize potential conflict with trail users.

Access Through Proposed Neighborhoods

-Public pedestrian access through the proposed development areas A, B, C, D, E, F, G, H, and J in at least 12 locations linking internal roads to surrounding golf course and open spaces shall be provided and signed year-round.

Connections to Existing Mammoth Lakes Trail System

- At points as indicated on attached map, the perimeter open space buffer and its trail(s) shall be connected to the existing and/or proposed Mammoth Lakes Trail System that is currently (and is proposed to exist) on the north side of Old Mammoth Road, either through subterranean, overpass, or traffic calming and signaled intersections along Old Mammoth Road.

Class I Bike Trails or Mammoth Lakes Trail System Extension

B27a-22

-A bike lane or Mammoth Lakes Trail System extension shall be provided through or parallel with the proposed traffic circle accessing the Mammoth Lakes Trail System path along the north side of Old Mammoth Road and completing it from the traffic circle west to Snowcreek VII.

Summer and Winter Access and Programming

-Programming and infrastructure shall be developed for both winter and summer use that will provide a full complement of recreation activities that are easily and conveniently accessible by means of human-powered mobility.
-All routes and points of public access shall be signed for both winter and summer public use.

Access Across Golf Course and Programming: Winter

-Public access and passage across the golf course shall be permitted and so signed throughout the winter months when a mutually agreed-upon (TOML and applicant) determined minimum snow depth or deeper is present.
-Routes shall be designed to assure direct and efficient passage between federal lands and Town lands and to minimize potential negative impacts to the golf course and to adjacent property owners.
-The infrastructure for the golf course shall be designed so as to accommodate a Nordic system that can exist on the golf course when sufficient snow is present as well as access potential Nordic systems on adjacent federal lands.
- The infrastructure of the golf course shall be designed so as to provide passage and access to federal lands by a full variety of human-powered winter recreation users.

4WD/ Motorized Vehicle Access

-A public staging point for snowmobiles and off-road vehicles shall be provided on the site adjacent to Sherwin Creek Road.

Signage

-All public access points and corridors shall be signed as such.

B27a-22
(cont'd)

CEQA Notes

(1) "Mitigation Measures Proposed to Minimize the Significant Effects... This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR." (CEQA Section 15126c)

B27a-23

ALTERNATIVES

The Alternatives section of the DEIR is inadequate because it does not rely on accurate setting, impact evaluation criteria, and impact analysis related to trails and public access issues as discussed throughout this letter. (1) For this reason, the DEIR underestimates potential trails and public

B27a-24

access impacts of both the project and the alternatives and does not include revised trails and public access design features in each alternative. Even with the additional mitigation recommended, MLTPA expects that access to federal lands will still be substantially altered, and as a result residual impacts are still expected to be significant. The FEIR should be revised to reflect this conclusion. As a result, MLTPA recommends that the trails and public access mitigation measures be incorporated into Alternatives B (Revised Site Plan) and D (Increased Density), expanded with even greater access opportunities such as a 100-foot public open space/trail buffer along and internal to the project eastern and southeastern perimeter, as well as two defined path corridors linking the perimeter, one south of neighborhood F between the golf course and Old Mammoth Road, and one between Old Mammoth Road and the southern perimeter of the old golf course. This expanded trails plan would have a greater potential to lower trails and public access impacts below the significant level.

B27a-24
(cont'd)

Alternative C (Reduced Density Alternative) would result in fewer trails and public access impacts than the proposed project due to the increased open space area in place of the expanded golf course, though impacts would still be significant. As a result, the MLTPA Trails and Public Access Mitigation Plan, with additions as described in the paragraph above, should be revised for this Alternative to eliminate recommended trails and public access features associated with the new golf course, assuming existing access would remain.

Notes

(1) "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or locations which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly." [CEQA Guidelines, Section 15126 (d)(1)]

B27a-25

Please keep us advised of all hearings and comment periods relative to this project.

Thank you again for the opportunity to comment.

Sincerely,

B27a-26

Laurie Oberholtzer
for
MLTPA

Attachments:

MLTPA Trails and Public Access Proposed Mitigation Map

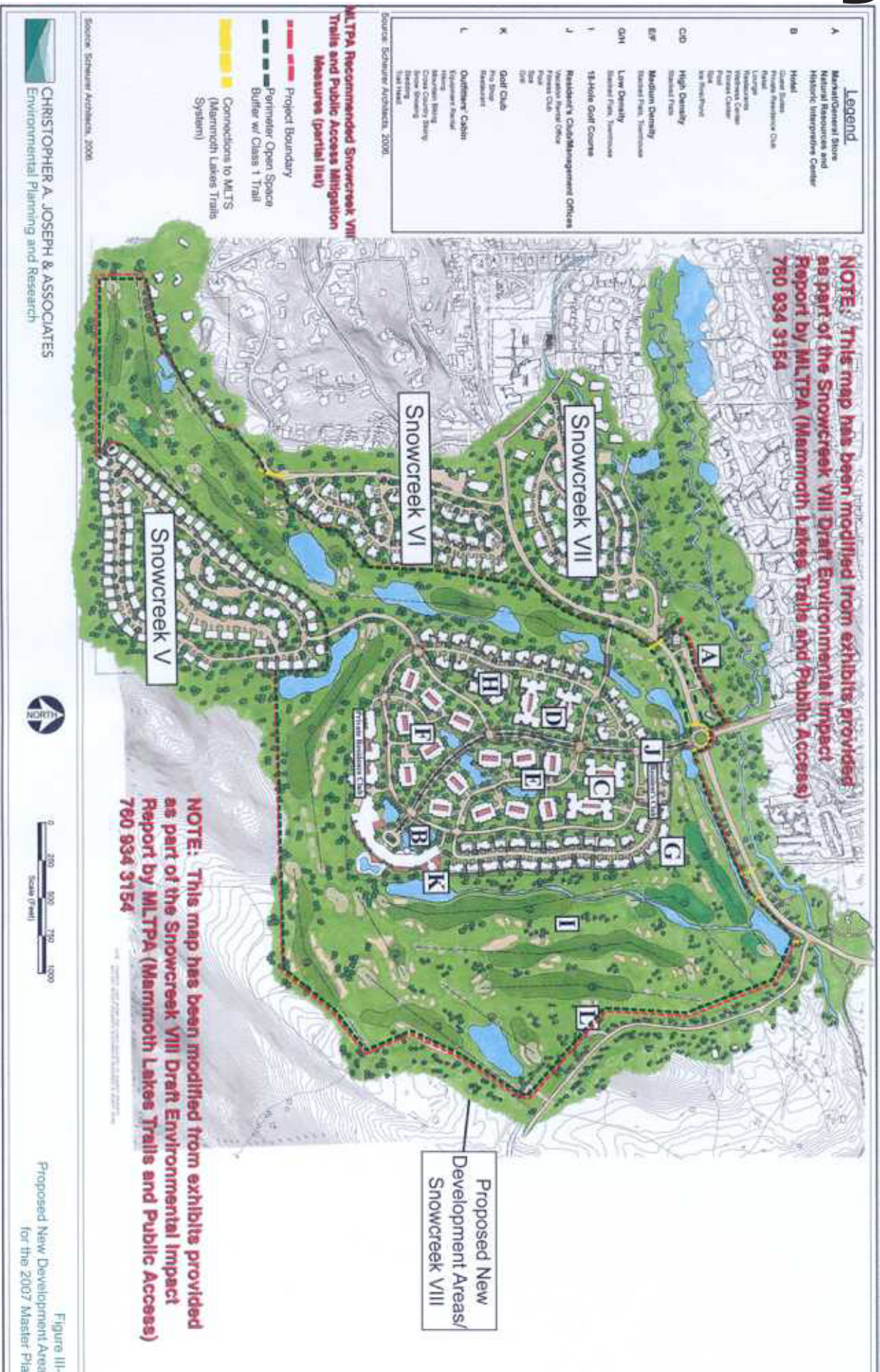
MLTPA Planning Proposal Executive Summary

MLTPA Action Plan, 2006

MLTPA GIS Inventory Report Map, September 7, 2007

Contractual Service Agreement Between the Town of Mammoth Lakes and
MLTPA, October 1, 2007, and Approval of Agreement, October 7, 2007

Memorandum of Understanding between MLTPA , the Town of Mammoth
Lakes, and various public agencies and organizations to form a collaborative
trails and public access working framework



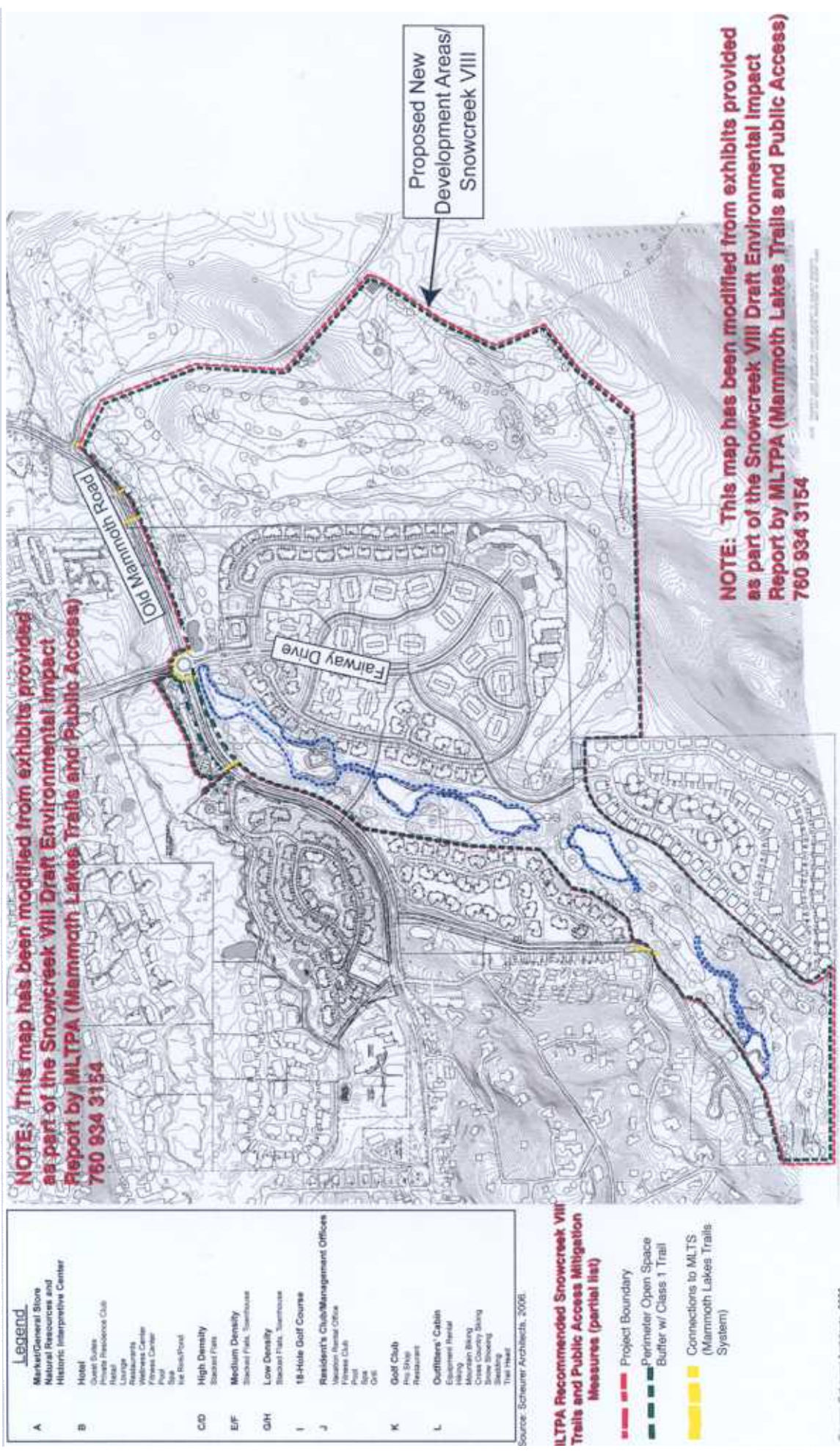


Figure 10-1: Proposed New Development for the 2007 Master Plan

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



PLANNING PROPOSAL EXECUTIVE SUMMARY

Mammoth Lakes Trails and Public Access (MLTPA) presents to the community of Mammoth Lakes a proposal for planning that will ensure the integration and stewardship of surrounding public lands with the Town of Mammoth Lakes. Recent characterizations by the Town Manager as to the critical nature of the current development environment and its potential implications for the future of the community must be taken as a call to action. Trails and public access planning will benefit current residents and visitors, our environment, our economy, and the many future generations who will be discovering the magic of Mammoth Lakes.

Program Summary

- The planning process will be a multi-jurisdictional effort administered by MLTPA and will include comprehensive outreach to the Mammoth Lakes community.
- MLTPA will contract with nationally recognized expert planning consultants: one for an update of the *Mammoth Lakes Trail System Plan (1991)* for territory within the Urban Growth Boundary (UGB), and a second for the balance of territory between the UGB and the Town of Mammoth Lakes Planning Area boundary.
- Final planning documents will be submitted to appropriate jurisdictional agencies for consideration, approval, adoption and implementation.
- Extensive volunteer and in-kind donation opportunities will foster community involvement and ownership.
- Multiple funding partners will ensure program success.
- Program time frame: 12 months

Program Goals

- Generate a Trails and Public Access Master Plan for territory within the UGB; generate a Trails and Public Access Concept Plan for the balance of territory between the UGB and the Town of Mammoth Lakes Planning Area boundary.
- Develop comprehensive and efficient data protocols, management and communication, including the MLTPA Data Library as a source for multi-jurisdictional data coordination.
- Develop a consistent signage and wayfinding program for appropriate inclusion as part of a larger and comprehensive signage and wayfinding system.
- Identify and catalog historic, cultural and environmental assets for connectivity assessment.
- Establish a two-way communication forum with the development community through "The Developers' Forum," a joint effort with the Mammoth Lakes Chamber of Commerce.
- Establish a stakeholder and public information forum for trail users through "Mammoth Trails" as developed with the Tourism and Recreation Commission Ad Hoc Committee (2006)



PLANNING PROPOSAL DELIVERABLES SUMMARY

FIRST STEPS

Start-up and initial expenses; generation of Initial High-Level Assessment identifying potential trail corridors and critical points of public access, for use by stakeholders.

Consultant: Within UGB
Initial Organization
Initial High-Level Assessment
4 Work Days

Consultant: Outside UGB
Initial Organization
Initial High-Level Assessment
2 Work Days

MLTPA Tasks + Admin
Initial Organization
Initiate Project Administration

TEAM ORGANIZATION

Team members' participation in quarterly, monthly, and biweekly team meetings over 12-month planning period; consultants' travel expenses to and from Mammoth Lakes, and on-site expenses; reimbursable office and project expenses.

Consultant: Within UGB
25 Team Meetings
4 (1) Week Long Trips – Outreach
2 (1) Week Long Trips – Field Work
Office Expenses
Production Expenses
17.5 Work Days

Consultant: Outside UGB
25 Team Meetings
Multiple Trips
103 Work Days on Site
Office Expenses
Production Expenses
15 Work Days

MLTPA Tasks + Admin
Project Administration
Team Meetings Logistics
Team Meetings Documentation

PUBLIC PARTICIPATION

Team members' participation in joint public meetings, joint and discrete meetings with stakeholders and user groups, and joint and discrete charettes, open houses, field trips, and jurisdictional/agency meetings; meeting logistics, promotion and documentation; project website; comprehensive public outreach; analog and online surveys; Mammoth Trails user forum; outreach and media relations.

Consultant: Within UGB
(4) Public Meetings
(4) Community by District Meetings
(6) Community Stakeholder Meeting
(10) Open Houses
(10) Field Trips
(5) Jurisdictional/Agency Meetings
30 Work Days

Consultant: Outside UGB
(4) Public Meetings
(4) User Group Meetings
(2) Charettes
(10) Open House
(10) Field Trips
(5) Jurisdictional/Agency Meetings
37 Work Days

MLTPA Tasks + Admin
Project Administration
Meetings Logistics + Promotion
Meetings Documentation
Comprehensive Public Outreach
Project Website
Online/Analog Surveys
Mammoth Trails User Forum
Media Relations

DATA COLLECTION

Compilation, verification, and distribution of available and existing planning data to team members; data integrity management by local GIS consultant; survey development; field data collection; volunteer coordination; MLTPA GIC assimilation; field condition analysis and verification.

Consultant: Within UGB
Existing Local Data Assimilation
MLTPA GIC Assimilation
Survey Development
15 Work Days

Consultant: Outside UGB
Existing Local Data Assimilation
MLTPA GIC Assimilation
Info From Stakeholders
Needs, Habits, Equipment
Survey Development
Identify User Patterns and Issues
Census Data - Safety
Land Use and Development
Destinations and Access
Ownership/Special Populations
Map Areas
Existing Trail Compatibility
Field Verify Map Routes/Corridors
Assess Route Conditions
Pedestrian Corridors in Town
14 Work Days

MLTPA Tasks + Admin
Project Administration
MLTPA Data Library
GPS/GIS Data Gathering
Volunteer Coordination
Local Data Coordination by
Data Management Technology
Project Data Coordination by
Data Management Technology

DATA ANALYSIS

Opportunities and constraints models; demand and benefit models; refinement of Initial High-Level Assessment; field data and conditions analysis.

Consultant: Within UGB
Opportunities and Constraints
Demand and Benefits Model
Refined High-Level Assessment
Analyze Survey Response Data
15 Work Days

Consultant: Outside UGB
Viewshed + Land Form Analysis
Benefits Management Model
Refined High-Level Assessment
Determine In Town Open Space
Analyze User Experience Levels
Sustainable Trail Standard
Sustainability of Popular Routes
Matrix of Compatible Uses
Opportunities and Constraints
30 Work Days

MLTPA Tasks + Admin
Project Administration

REPORTING

Consistent and timely reporting on planning process to partners and community.

Consultant: Within UGB
-
-
-

Consultant: Outside UGB
-
-
-

MLTPA Tasks + Admin
Project Administration
Project Reporting
Reports Distribution

NETWORK IDENTIFICATION

Production and presentation of concept plans; identification and mapping of projects; potential-facilities identification; connections identification.

Consultant: Within UGB
Concept Plan
Access and Trail Connection
100 Potential Projects
GIS Map Proposed Projects
22.5 Work Days

Consultant: Outside UGB
Conceptual Planning Zones
User Specific Facility Concepts
Future Connections
Materials – Network ID
16.5 Work Days

MLTPA Tasks + Admin
Project Administration

INFRASTRUCTURE

Comprehensive (within and outside UGB) signage and wayfinding recommendations; comprehensive (within and outside UGB) design guidelines.

Consultant: Within UGB
Signage and Wayfinding
Design Guides
20 Work Days

Consultant: Outside UGB
Signage and Wayfinding
Design Guides
8 Work Days

MLTPA Tasks + Admin
Project Administration

IMPLEMENTATION

For within the UGB only: identification of funding opportunities; agency responsibility identification; recommendations for implementation phasing.

Consultant: Within UGB
Funding Opportunities
Agency Responsibility Matrix
Project Phasing
7.5 Work Days

Consultant: Outside UGB
-
-
-

MLTPA Tasks + Admin
Project Administration

MASTER PLAN

Joint presentation of draft and final master plan (within UGB) and draft and final concept plan (outside of UGB); joint presentation of accompanying materials; distribution to community; presentation of plans to agencies and jurisdictional partners; presentation to community for adoption.

Consultant: Within UGB
Stakeholder Presentations
Operations and Maintenance
Design Guidelines
Signage and Wayfinding
Costs and Funding
Benchmarking
Agency Presentations
Final Product Delivery

Consultant: Outside UGB
Stakeholder Presentations
Operations and Maintenance
Design Guidelines
Signage and Wayfinding
Costs and Funding
Benchmarking
Agency Presentations
Final Product Delivery

MLTPA Tasks + Admin
Project Administration
Public Presentation
Plan Distribution



Mammoth Lakes Trails and Public Access

Action Plan

December 20, 2006



PO Box 100 PMB# 432
Mammoth Lakes, CA 93546
760 934 3154
mltpa.org

Acknowledgements:

This document provides a vision and Action Plan for trails and public access in Mammoth Lakes, California. The Action Plan was developed during a Strategic Conference organized by Mammoth Lakes Trails and Public Access (MLTPA), held on November 4–5, 2006. The Strategic Conference and planning process were made possible with the generous support of Mammoth Mountain Ski Area, the U.S. Forest Service, and the Town of Mammoth Lakes. This document was produced by Jeff Olson of Alta Planning + Design. Elizabeth Martin of The Sierra Fund facilitated the conference sessions on non-profit organization. The cover photo was provided by Christian Pondella, and map graphics were developed in cooperation with John Wentworth of MLTPA and Nate Greenberg of the Town of Mammoth Lakes. Special thanks are due to all the volunteers who helped make this project happen, and to the following individuals who participated in the Strategic Conference planning sessions:

Jo Bacon
Scott Burns
Tony Colasardo
Alex Fabbro
Karen Ferrell-Ingram
Eric Fishburn
Mary Beth Hennessy
Jeff Irons
John Knott
Andrea Lawrence
Elizabeth Martin (facilitator)
Brad Mettam
Kit Muhs

Greg Newbry
Jeff Olson (consultant)
Mary Kay Prentice
Shields Richardson
Roy Saari
Mike Schlafmann
Kim Stravers
Danna Stroud
Wendy Sugimura
Dawn Vereuck
John Vereuck
Mark Wardlaw
John Wentworth



Participants in the MLTPA
Strategic Conference,
November 2006.



1. Overview

Mammoth Lakes, California, is a unique destination-resort community located in the Eastern Sierra region of Central California. As the community grows, residents, visitors, and businesses are concerned with maintaining the region's high quality of life. A central issue is ensuring access to the public lands that are among the region's most significant assets. In many ways, the future of Mammoth Lakes depends on developing a system of trails and public access that will properly integrate the community and its surrounding natural environment. To date, there is no government agency, non-profit entity, business or citizens' group specifically charged with the realities of this integration process, and, as a result, critical points of public access are at risk and public lands surrounding the town do not benefit from the generous stewardship this community could provide.

In November 2006, a Strategic Conference was held to develop an Action Plan for Trails and Public Access in Mammoth Lakes. For two days, citizens, planners, local officials, businesses, and other participants from the public, private, and non-profit sectors worked together to share their vision for Mammoth Lakes and the surrounding region. This Action Plan is a result of the Strategic Conference, and it will serve as a guide for the development of a trails and public-access system in Mammoth Lakes. The plan is presented in two key sections: Organization and Projects. The Organization section presents the steps needed to establish a public-private partnership to support the community's vision. The Projects section identifies potential efforts that will help create a connected system of trails and public access.

The purpose of this Action Plan is to establish a vision for a comprehensive system of trails and public access for Mammoth Lakes and the surrounding region. The vision is based on the goals identified in the Mammoth Lakes General Plan, as shown in the text on the upper right side of this page. Trails and public access directly relate to each of these goals, and are an important part of the future for Mammoth Lakes. The recent University of California Santa Barbara Economic Forecast Report for the community supports this vision, as shown in the quote below from the report's recommendations.

General Plan Goals

Town of Mammoth Lakes
1992 Vision Statement Update

- ❖ A desirable place to live and visit
- ❖ A healthy natural environment
- ❖ A high quality, full service recreation resort and community available to all economic sectors
- ❖ A vital year-round community
- ❖ Housing, employment, public facilities and services for all segments of the community
- ❖ A comprehensive circulation system de-emphasizing the automobile and promoting pedestrian, bicycling and transit options.
- ❖ A consistent, attractive appearance and image which reflects the town's Alpine setting

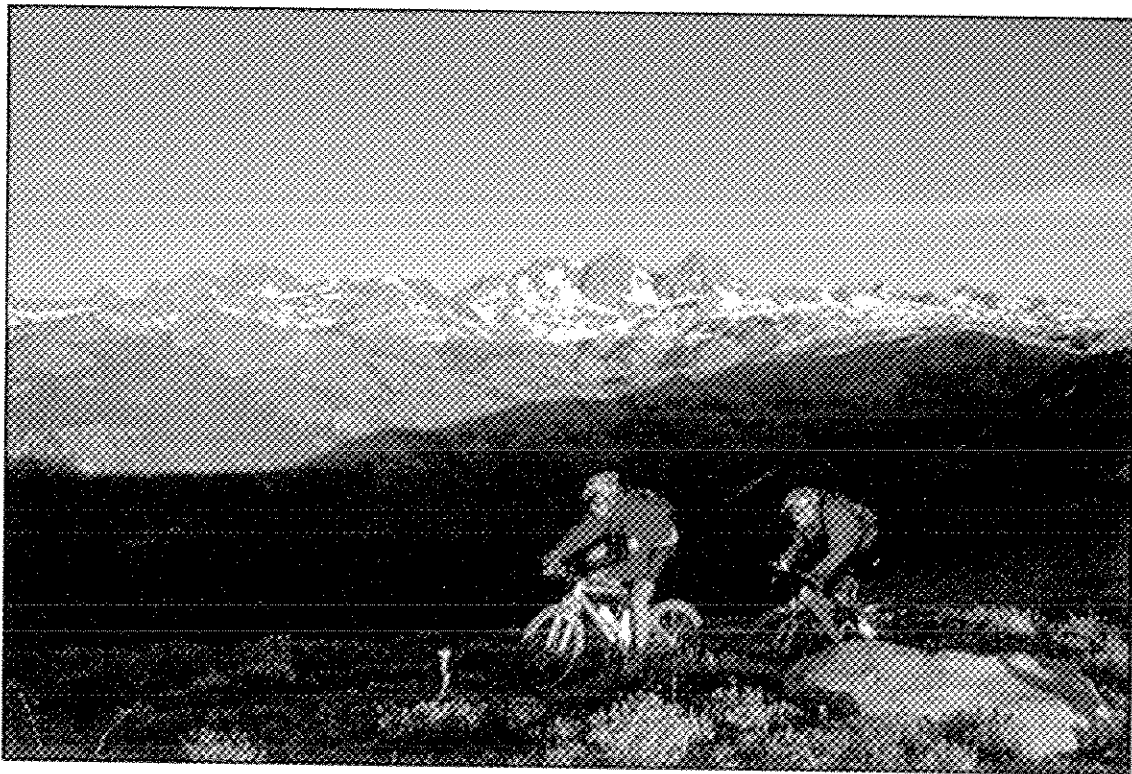
"The ideal positioning strategy for Mammoth Lakes will be one that encompasses all it has to offer, now and in the near future. It should build off of Mammoth's currently perceived strengths, as well as appeal to the key demographic groups that can provide the town with economic sustainability. For example, Mammoth could be presented as "California's Playground". This positioning approach allows Mammoth to build off its existing strengths of skiing and camping/ biking. Under the "California's Playground" umbrella, Mammoth Lakes could easily market other active outdoor pursuits, as well as offer leisure options and activities. To illustrate, Mammoth Lakes could consider doing all of the following: Develop a strong presence in mountain biking, possibly working to be identified as the mountain biking capital of California. . ."

Report to the Town of Mammoth Lakes by the UCSB Economic Forecast Project, 2006

The Town of Mammoth Lakes includes three defining land-use boundaries: the Urban Growth Boundary, the Town Boundary, and the Planning Area as represented in the 1987 General Plan. What is unique about the proposed trails and public-access system is that it creates a vision for integrating the human and natural environments across these three jurisdictions. The idea of “trails and public access” as it applies to Mammoth Lakes must be clearly defined throughout the entire effort of MLTPA. This core concept is described in the following principles:

- 1) The town of Mammoth Lakes includes a system of trails within its Urban Growth Boundary (a land area of 4.5 square miles).
- 2) The Town of Mammoth Lakes includes trails and outdoor recreation amenities within the Town Planning Area on U.S. Forest Service public lands, including Mammoth Mountain Ski Area (a land area of 150+ square miles).
- 3) MLTPA’s objective will be the seamless and jurisdiction-free integration of trails, trail systems, and outdoor recreation amenities through a regional planning effort and a porous Urban Growth Boundary guaranteed by secure public access.

This vision is summarized by the simple phrase “1 + 2 = 3.” All three of the principles described above must be seen as working together to create a region whose whole is greater than the sum of its parts. The synergies created by this concept will develop a new relationship between the human and natural landscape in the Mammoth Lakes region. These principles form the foundation of the organization and project concepts presented in the following sections of this Action Plan.

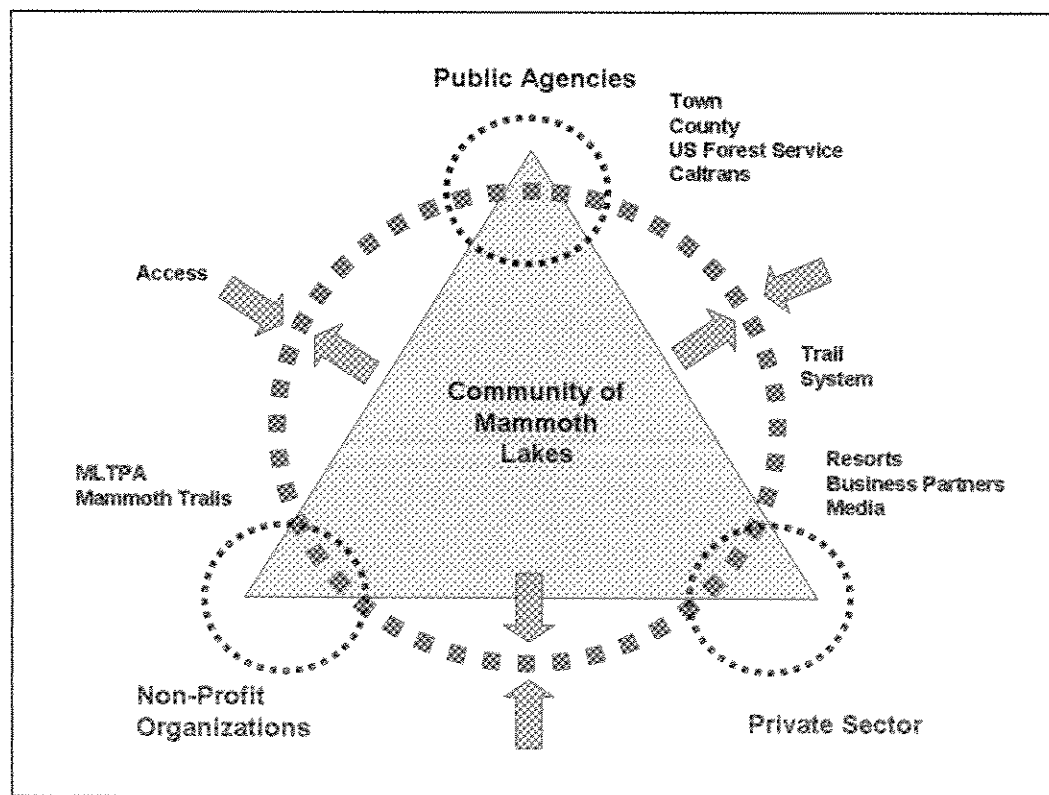


Mountain biking in Mammoth Lakes. Photo by Christian Pondella

2. Organization

The first step in developing a trails and public-access system for Mammoth Lakes is organization. The multi-jurisdictional challenge for MLTPA is unique. No other existing group or organization has stepped forward to successfully address the community's trails and public-access issues. This is why MLTPA is an essential part of the future of Mammoth Lakes. The roots of MLTPA extend back to the winter of 2005--'06 and a dispute over a private gate on a public road and egress from a key outdoor recreation amenity. In July 2006, MLTPA presented a "Mobility Plan Resources Report" to a joint meeting of the town Planning, Public Arts, and Tourism and Recreation commissions. That presentation led to MLTPA working under contract with the Town to develop a GIS inventory of public access locations. MLTPA subsequently organized the Strategic Conference and related public events in November 2006.

In communities with successful trail programs, a non-profit organization (such as MLTPA) is part of a "partnership triangle" representing the relationships between the public, private, and non-profit sectors. For Mammoth Lakes, this potential partnership is illustrated in the organization chart below:



This "partnership triangle" shows the relationships between public, private, and non-profit organizations, and the concept of a trails and public-access system for the community of Mammoth Lakes and the surrounding region.

The strategic conference participants identified the need for getting MLTPA established as a sustainable non-profit organization. An Interim Working Group (IWG) was identified, and these volunteers will help to identify candidates for a Board of Directors and act as an interim sounding board as MLTPA is structured and incorporated. Individuals, businesses, and organizations will participate as “friends” of MLTPA, but there will not be a voting membership structure. MLTPA will have formally adopted bylaws and legal status as a non-profit organization registered in the State of California. Partnership agreements will be established between MLTPA and the region’s land managers, including the U.S. Forest Service, the Town of Mammoth Lakes, Mono County, resort properties, and others. As a key part of its mission, MLTPA will serve as a coordinating entity for Mammoth Trails, an alliance of trail user groups representing all of the region’s trail interests. This alliance will serve as a forum for cooperation among motorized and non-motorized trail organizations, and will facilitate a web-based portal for public information on trails, public access, and outdoor recreation amenities. Mammoth Trails will eventually have a representative on the MLTPA Board of Directors.

The following draft mission statement was developed for MLTPA at the Strategic Conference to summarize the relationship between the public, private, and non-profit sectors in working together to achieve a common vision:

“MLTPA will plan, steward, interpret, promote, and sustain a system of four-season trails and public access to natural areas in Mammoth Lakes and the Eastern Sierra region, while protecting its natural resources. We do this by collaboratively engaging government agencies, nonprofit organizations, businesses, and concerned citizens, and creating a forum for all trail users to be involved, connecting people and nature.”

The formal organization process for MLTPA is envisioned in three phases, as follows:

PHASE 1 - INTERIM PHASE: “Forming”

The next phase of MLTPA involves capitalizing on the successful efforts of the past year and the Strategic Conference. The Interim Working Group (IWG) will guide MLTPA through these steps. The Sierra Fund will serve as an “incubator” organization to support MLTPA during this transition period.

SHORT-TERM ACTIONS: November 2006 to February 2007

The following actions describe the next steps for moving MLTPA forward as an organization:

- 1.1 Update the MLTPA website with materials from the Public Meeting and Strategic Conference.
- 1.2 Incorporate as a 501(c)3 non-profit organization registered in the State of California, and develop interim bylaws.

- 1.3 File for non-profit status with the IRS.
- 1.4 Circulate the draft Action Plan to the IWG with “*Master Planning of Trails and Public Access within the Town of Mammoth Lakes Planning Area, Town Boundary, and Urban Growth Limit*” as the primary strategic objective. Convene an IWG meeting in December.
- 1.5 Identify and recruit potential members of the MLTPA Board.
- 1.6 Prepare a first-year operations budget for MLTPA (including overhead and staff costs) and a draft business plan, with a detailed financial strategy, priorities, and benchmarks.
- 1.7 Convene the first meeting of the MLTPA Board of Directors in the first weeks of January 2007.
- 1.8 Develop MLTPA’s “Proposal to the Community.” This will be a proposal to integrate the community of Mammoth Lakes with its surrounding public lands through a trails and public access master-planning process, subsequent adoption and approval of the proposed Master Plan, and implementation of the Master Plan. The proposal will include the following sections:
 - The objective of the effort
 - The partners who will be involved in the process
 - The specific steps necessary to proceed
 - The benefits to the community
 - The cost to the community
 - The agency agreements, planning process, and timelines
- 1.9 Develop a Memorandum of Understanding (MOU) for MLTPA’s partnership with the USFS:
 - During the planning process
 - For approval of the plan
 - During implementation
- 1.10 Develop a Memorandum of Understanding (MOU) for MLTPA’s partnership with the Town:
 - During the planning process
 - For approval of the plan
 - During implementation
- 1.11 Develop a methodology for MLTPA’s funding and operations:
 - As an organization
 - During the planning process
 - During implementation
 - For the long term, including consideration of creating an MLTPA Endowment that will generate sustainable funding
 - Define MLTPA’s relationships with the private sector and the community, including potential creation of an MLTPA Advisory Board
 - Define the MLTPA partnership with Mammoth Trails
- 1.12. Continue ongoing communications with the Strategic Conference participants to develop support for the Proposal to the Community.

1.13 Work with the local media to communicate the Action Plan.

1.14 Secure a contracted, financed commitment from the town by March 1, 2007, to undertake the trails and public access master-planning effort.

PHASE 2 - ESTABLISHING MLTPA: "Storming"

The second phase will build on the base created during the forming phase. These activities will involve MLTPA as a leadership organization for making positive changes for trails and public access in the Mammoth Lakes community. These steps are essential to support the work of other public- and private-sector partners within the partnership triangle developed at the Strategic Conference. The term "storming" refers to taking actions that turn the organization's goals into reality.

MID-TERM ACTIONS: March 2007 to December 2007

These actions will be distinguished by two separate areas of endeavor: 1) the actions and process of the MLTPA organization; and 2) the Trails and Public Access Master Plan process.

2.1. Develop the Mammoth Lakes Trails and Public Access Master Plan. This task is the cornerstone of all of MLTPA's future efforts, and is the organization's top priority.

2.2 Continue developing the means for community outreach and education as part of the planning process, and identify outdoor recreation groups and existing organizations as partners in development of the Trails and Public Access Master Plan. Make good use of the GIS data gathered by MLTPA under contract with the Town.

2.3 Integrate trails and public access as priorities into the Mammoth Lakes General Plan Update. The Trails and Public Access Master Plan can be referenced by the updated Mammoth Lakes General Plan.

PHASE 3 - MAMMOTH TRAILS: "Norming"

Once MLTPA is formally established and the Master Plan has been generated and adopted, the organization can move forward with "living the mission statement" and implementing projects in the community and region. Actions at this level will need to remain strategic in nature, so that the organization's resources are used efficiently. The term "norming" refers to integrating MLTPA throughout the Mammoth Lakes community so that trails and public access become cornerstones of the region's identity.

LONG-TERM ACTIONS: January 2008 and beyond

- 3.1 Integrate the Trails and Public Access Master Plan recommendations into Mammoth Lakes mobility planning and U.S. Forest Service planning projects.
- 3.2 Convene the Mammoth Trails user group alliance, and initiate a format for ongoing cooperation.
- 3.3 Coordinate the Mammoth Trails website with trail information, maps, and other resources.
- 3.4 Develop an MLTPA Endowment fund for long-term financial sustainability.
- 3.5 Assist partner organizations in advocacy for the support of trails and public access at the regional, state, and national levels.

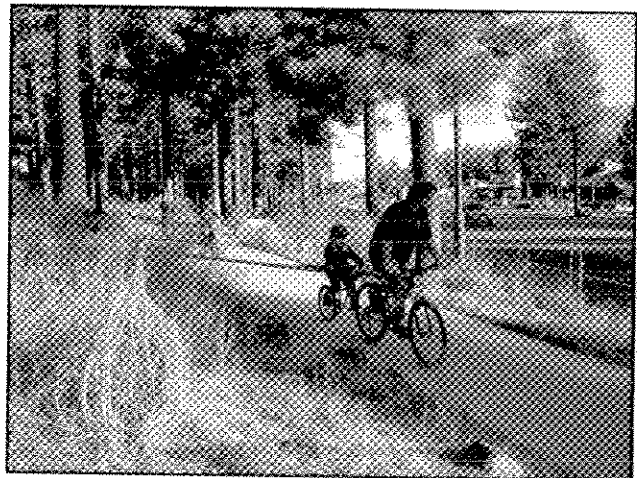
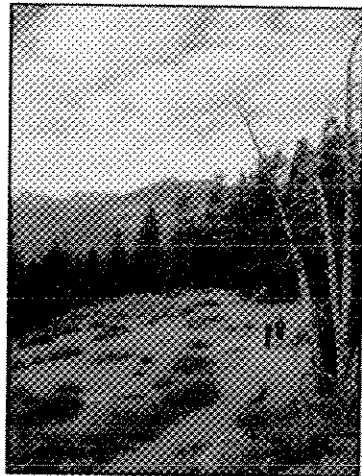
3. Projects

With MLTPA's leadership and a plan for trails and public access, the community and local partners can create new projects and initiatives. Pieces of the future trails and public-access system are in place within the town and the surrounding landscape, but these pieces are not well connected, signed, or managed. The Strategic Conference participants confirmed that there is consensus for creating a connected system of trails and public access in Mammoth Lakes.

In 1991, the Town of Mammoth Lakes developed a trails plan that included a paved loop bike path around the center of town and connecting trails to the surrounding public lands. Sections of the loop trail have been built, and new sections are in progress. For example, the Mammoth Creek Trail includes three grade-separated tunnel sections. They are a significant investment in the community's trail infrastructure. The Lake Mary Road bike path has been designed and is scheduled to commence construction in 2007, and other "missing links" of the in-town trail loop are being planned. These are essential next steps for residents and visitors who can enjoy a trail experience within the town center.

A fundamental concept for the Mammoth Lakes trails and public-access system is the vision of a regional trails system connected with a "porous" perimeter. The in-town trails within the Mammoth Lakes Urban Growth Boundary can be connected to access points around the edges of town, and this perimeter can, in turn, be connected to frontcountry and backcountry trails in the surrounding region. The combination of a world-class system of trails, a porous town perimeter, and access into a regional network will make Mammoth Lakes a world-class trail community.

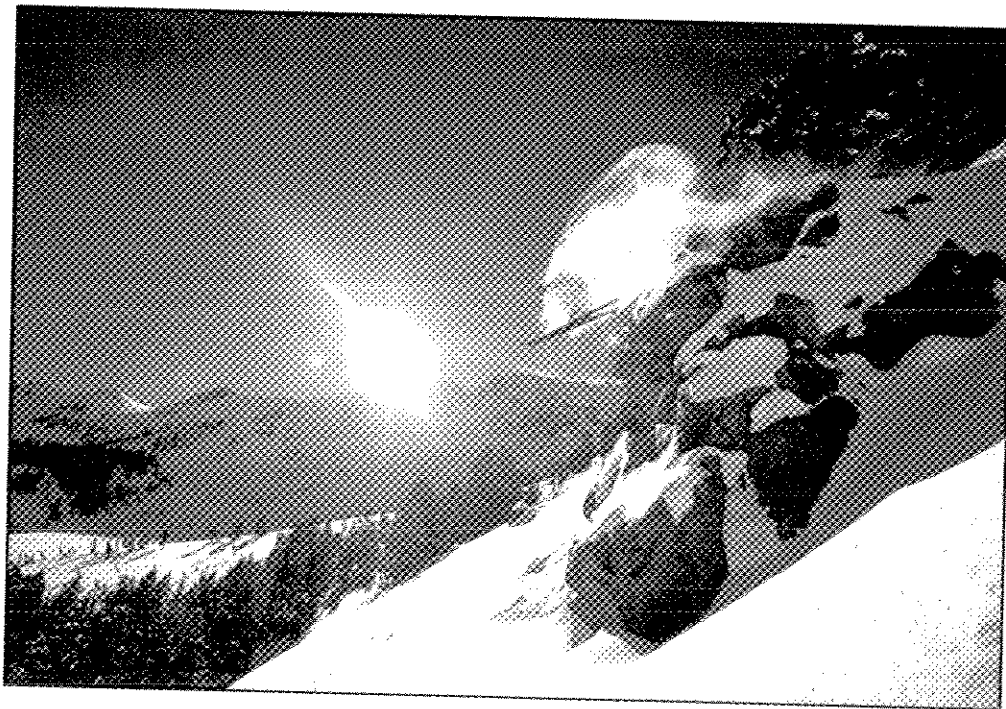
A connected system of trails and public access will provide a rare combination of in-town and backcountry experiences within the Mammoth Lakes region.



While it is possible to imagine specific projects for the future Mammoth Lakes trail system, it is important at this time for MLTPA to maintain its focus on the goal of developing a Trails and Public Access Master Plan, and not propose specific trail ideas or solutions outside of the planning process. MLTPA is committed to not compounding the challenges for trails and public access. Attempting to find incremental solutions to difficult access issues outside of the context of a Master Plan is not in the organization's best interest at this time. Unless it is a critical issue of public access that requires immediate action, MLTPA should not engage its resources for projects that are not part of a Trails and Public Access Master Plan.

With this strategic approach in mind, it is still important to frame a vision of the future and to capture the ideas expressed at the Strategic Conference. The maps on the following pages show the public land areas and potential trail uses within the Mammoth Lakes region, and a conceptual graphic of the potential trails and public-access system. The land areas surrounding the community each have a distinct character and landscape. These areas are described as the Northern Lands, Western Lands, Lakes Basin, Hidden Lake/Sherwins, Eastern Lands, High Country, Within the Urban Limit, and Mammoth Mountain Ski Area. Through careful planning and public involvement, these sub-regions can be connected into a system that makes it possible for residents and visitors to have access to a diverse range of outdoor experiences—all within walking distance from the center of town. It is possible to imagine getting on a trail in Mammoth Lakes and having easy access to desert, forest, alpine, and riparian zones within the same day—a rare experience anywhere on Earth.

Achieving this vision will require the creation of a connected trails infrastructure, including shared-use paths, singletrack trails, trailheads, on-street improvements, safe crossings, transit connections, signage, wayfinding, operations and maintenance programs, and policies that support the system. The trail system will serve a wide spectrum of trail users, from children going to school to adventure travelers accessing the backcountry of the Sierra. The creation of this system is an excellent opportunity to involve a broad cross-section of community partners, including education, public health, businesses, tourism, public works, parks, land managers, developers, resorts, transportation agencies, and others.



Skiing in Mammoth Lakes. Photo by Christian Pondella



Public Land Areas: Amenities

Northern Lands

Winter

- Backcountry Skiing/Snowboard
- Dog Sledding
- Kicker Zone
- Nordic Skiing
- OSV
- Pet Play
- Snowplay
- Snowshoeing
- Vistas

Summer

- Birding
- Bow Hunting
- Camping
- Climbing
- Disc Golf
- Equestrian
- Hiking/Walking
- Mountain Biking
- OHV
- Pet Play
- Road Biking
- Trail Running
- Vistas

Eastern Lands

Winter

- Backcountry Skiing/Snowboarding
- Ice Climbing
- Nordic Skiing
- OSV
- Vistas

Summer

- Boulderling
- Caving
- Climbing
- Equestrian
- Fishing
- Fall Color Viewing
- Hiking/Walking
- Mountain Biking
- OHV
- Pet Play
- Trail Running
- Wildflowers

Lakes Basin

Winter

- Backcountry Skiing/Snowboarding
- Ice Fishing
- Ice Skating
- Nordic Skiing
- OSV
- Snowshoeing
- Winter Camping
- Winter Hiking/Walking
- Vistas

Summer

- Boating
- Boulderling
- Camping
- Climbing
- Equestrian
- Fall Color Viewing
- Fishing
- Hiking/Walking
- Mountain Biking
- Pet Play
- Road Biking
- Swimming
- Trail Running
- Vistas
- Wildflower Viewing

MMSA

Winter

- Backcountry Skiing/Snowboarding
- Dog Sledding
- Vistas

Summer

- Climbing
- Hiking/Walking
- Mountain Biking
- Trail Running
- Vistas

Western Lands

Winter

- * Backcountry Skiing/Snowboarding (with OSV)
- * OSV (on road)

Summer

- * Birding
- * Bouldering
- * Camping
- * Climbing
- * Equestrian
- * Fall Color Viewing
- * Fishing
- * Hiking/Walking
- * Pet Play
- * Road Biking
- * Swimming
- * Trail Running
- * Vistas
- * Wildflowers

High Country

Winter

- * Backcountry Skiing/Snowboarding
- * OSV
- * Pet Play
- * Snowshoeing
- * Vistas
- * Winter Camping

Summer

- * Bouldering
- * Camping
- * Climbing
- * Equestrian
- * Fall Color Viewing
- * Hiking/Walking
- * Mountain Biking
- * OHV
- * Trail Running
- * Vistas
- * Wildflower Viewing

Sherwins/Hidden Lake

Winter

- * Backcountry Skiing/Snowboarding
- * Kicker Zone
- * Nordic Skiing
- * OSV
- * Pet Play
- * Snowshoeing
- * Vistas

Summer

- * Birding
- * Equestrian
- * Fall Color Viewing
- * Hiking/Walking
- * Mountain Biking
- * Pet Play
- * Trail Running
- * Vistas
- * Wildflower Viewing

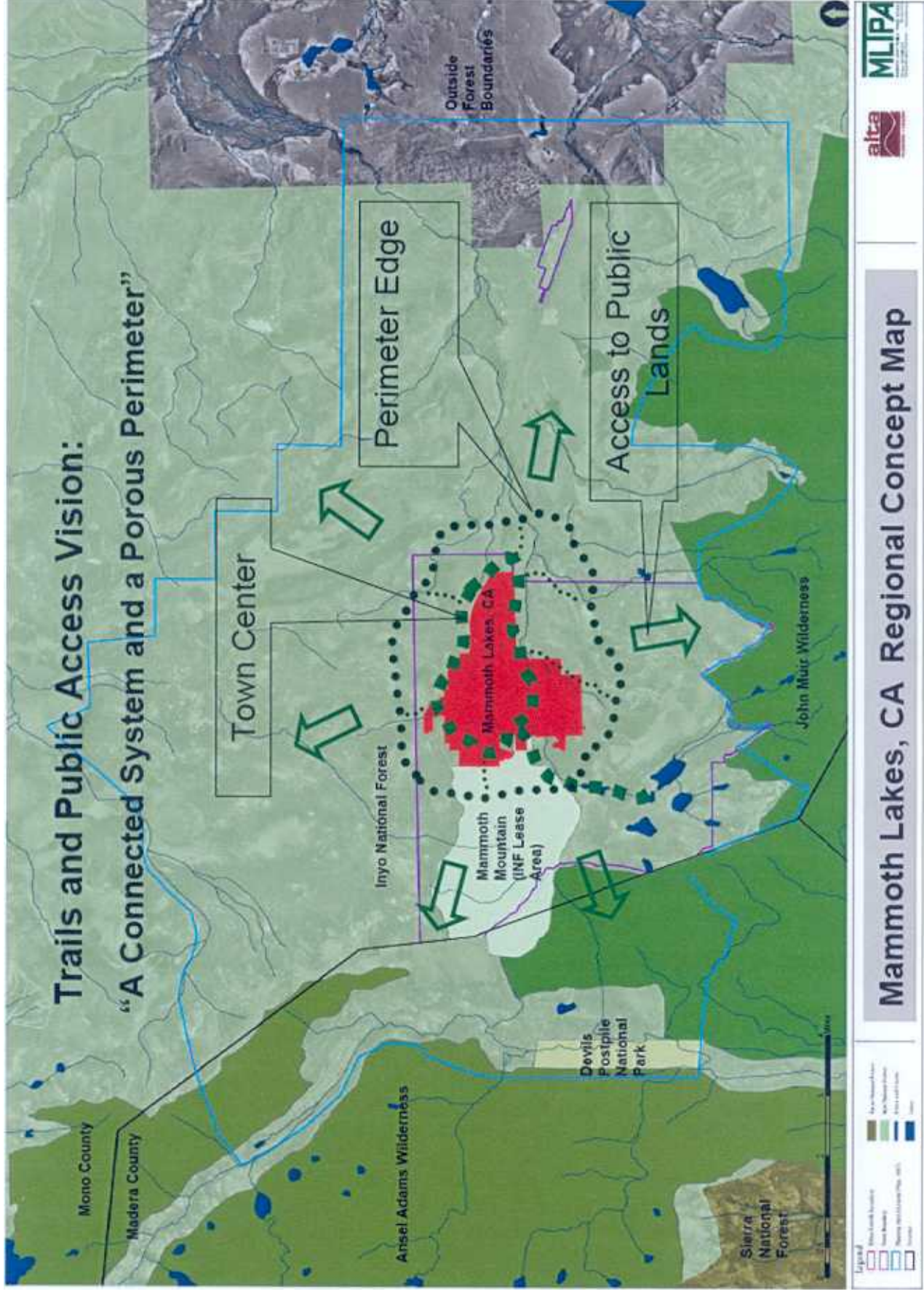
Within the Urban Limit

Winter

- * Nordic Skiing
- * Pet Play
- * Snowplay
- * Snowshoeing
- * Vistas
- * Winter Camping
- * Winter Hiking/Walking
- * Workforce

Summer

- * Camping
- * Cross-Country Running
- * Equestrian



While it is too soon to recommend specific solutions, the Strategic Conference participants identified more than 100 ideas for potential trails and public-access projects. The following list is not intended to be final or comprehensive, but represents a range of ideas and the potential for trails and public access in the Mammoth Lakes region. The following is a selected list of projects identified as potential concepts for MLTPA to consider during the Trails and Public Access Master Plan process:

Lake Mary Road Bike Path Project: This project is already designed and funded, and is scheduled to start construction in 2007. It will provide trail access between the town loop trail and the Lakes Basin area. Support for this project is important as a connection between ongoing efforts initiated in the last decade and new initiatives for completing the missing links in the town loop trail.

Signage and Wayfinding Program: Consistent graphics, information, and communications are an important part of creating a high-quality trails system. Developing a signage and wayfinding program is an integral element of the Mammoth Lakes community's identity and public image.

Interpretation and Heritage Trails Information System: A Geographic Information System (GIS) can be used to create a database, user maps, and public information for interpretive and heritage elements of the trails system. The region's landscape has a significant natural and human history that can be told through the region's trails. Examples include the story of John Muir, the forces of geology, and the management of the Los Angeles water supply system.

Complete the In-Town Loop: The existing Mammoth Creek Trail and other sections of the paved paths within the town center represent important pieces that need to be connected into a complete loop trail. This loop will form the core of the trail system within the Urban Growth Boundary.

Develop a Perimeter Edge Trail: Mammoth Lakes has the unique potential to connect the Mammoth Rock Trail and other existing singletrack trails into a perimeter trail around the community's edge. This trail can help define the community's boundary with the adjacent Sierra frontcountry, and can serve as a gateway for access points to the backcountry.

Plan for All Trail Users: The Mammoth Lakes region has opportunities for all types of trail users, ranging from snowmobiles and ATVs to wilderness hiking, mountain biking, and Nordic and backcountry skiing. It is important for MLTPA to clearly state that all of these trail types are part of the planning process, and that, with the permission of land managers, these multiple uses can coexist in the region.

Ensure ADA Access: "Public Access" must include providing access for people with disabilities. While not all trails can be made accessible for everyone, the trail system must be planned to include the greatest range of accessibility possible, and trail information systems should be designed to communicate trail surfaces, grades, and other important information to people of all ages and abilities.

No Net Loss of Trails and Public Access: The GIS inventory conducted by MLTPA indicates more than 150 existing points of access to the region's public lands. This inventory can form a baseline to ensure that as the community grows, access is maintained to and from these lands. A flexible approach can be based on a concept of "no net loss," so that access is considered a part of the region's infrastructure planning. This approach is similar to the way that wetlands impacts are managed.

Funding Applications: The California Transportation Department currently has funding available from the State Bicycle Transportation Account (BTA) and Safe Routes to Schools (SR2S) programs. The Town of Mammoth Lakes currently has two sections of the in-town loop trail that qualify for these funding sources,

and is preparing the funding applications. In addition, the national Bikes Belong coalition provides grants to advocacy organizations like MLTPA.

Proposition 84 Funding Application: On Election Day, California voters approved Proposition 84, which will provide significant funding for Water Quality, Safety, and Supply, Flood Control, Natural Resource Protection, and Park Improvements. This will provide another opportunity for trails and public-access funding in the Mammoth Lakes region.

Trails and Transit: As the public transit system grows in Mammoth Lakes, there are opportunities to connect trailheads and transit stops to provide increased access and mobility for the community. Bike and ski racks can be provided on buses and trolleys, and the planning of trails and transit routes can be coordinated.

Art on the Trails: A great way to involve the community in trails is to develop art on the trails. This can include sculptures designed as "mile points," custom-designed "hitching posts" for equestrians and bicyclists, and storytelling and music performed along the trails. These creative initiatives will reach segments of the community that might not otherwise get involved in trails, and can create a unique identity for the Mammoth Lakes trail system.

Four-Season Trails/Nordic System: The Mammoth Lakes trail system can help diversify the region's economy by providing a wide range of four-season experiences. Examples include the new Nordic Trails initiative, which will create new cross-country skiing opportunities, the Mammoth Century road bicycling route, and the recent growth in the sport of trail running.

PROJECT ACTIONS:

- 1. Trails and Public Access Master Plan:** Develop the Mammoth Lakes Trails and Public Access Master Plan and have the plan adopted by the Town, County, and U.S. Forest Service.
- 2. Funding Applications:** Submit Caltrans BTA and SR2S funding applications. Develop an MLTPA grant application proposal for funding from the Bikes Belong coalition.
- 3. Signage and Wayfinding Program:** Develop a consistent, high-quality trails and public-access signage and wayfinding system, in cooperation with land management partners.
- 4. ADA Accessibility:** Conduct a public forum on accessibility in spring 2007, as a next step toward an ongoing public dialogue about trails and public-access issues.
- 5. Trail Map:** Produce a Mammoth Trails map that identifies the existing trails and public-access system, in cooperation with the Mammoth Trails alliance and other partners.

ACTION PLAN TIMELINE:

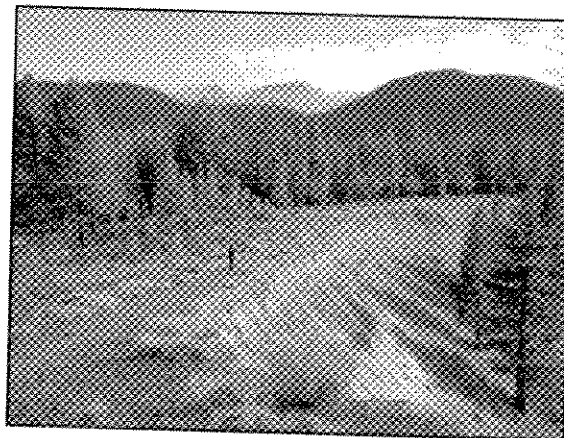
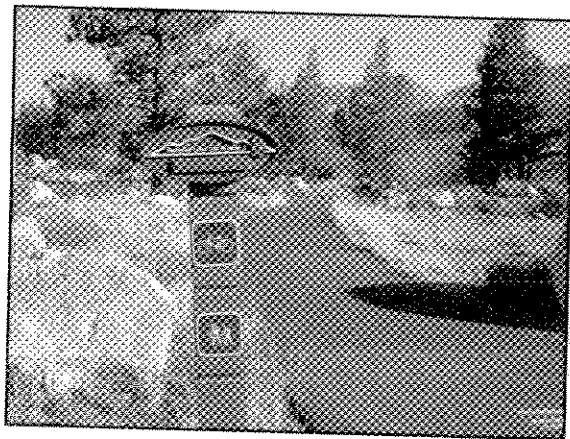
The Strategic Conference participants agreed that the momentum created by MLTPA represents a rare opportunity for action. With the tasks identified in this document as a guideline, the following timeline was developed for implementing the MLTPA Action Plan:

December 2006:	MLTPA Interim Working Group (IWG) meeting
January 2007:	Reconvene MLTPA Strategic Conference group; first MLTPA Board meeting
February 2007:	MLTPA Proposal to the Mammoth Lakes Community presentation
March 2007:	Approval of Trails and Access Master Plan funding
April to Dec. 2007:	Develop the Mammoth Lakes Trails and Public Access Master Plan

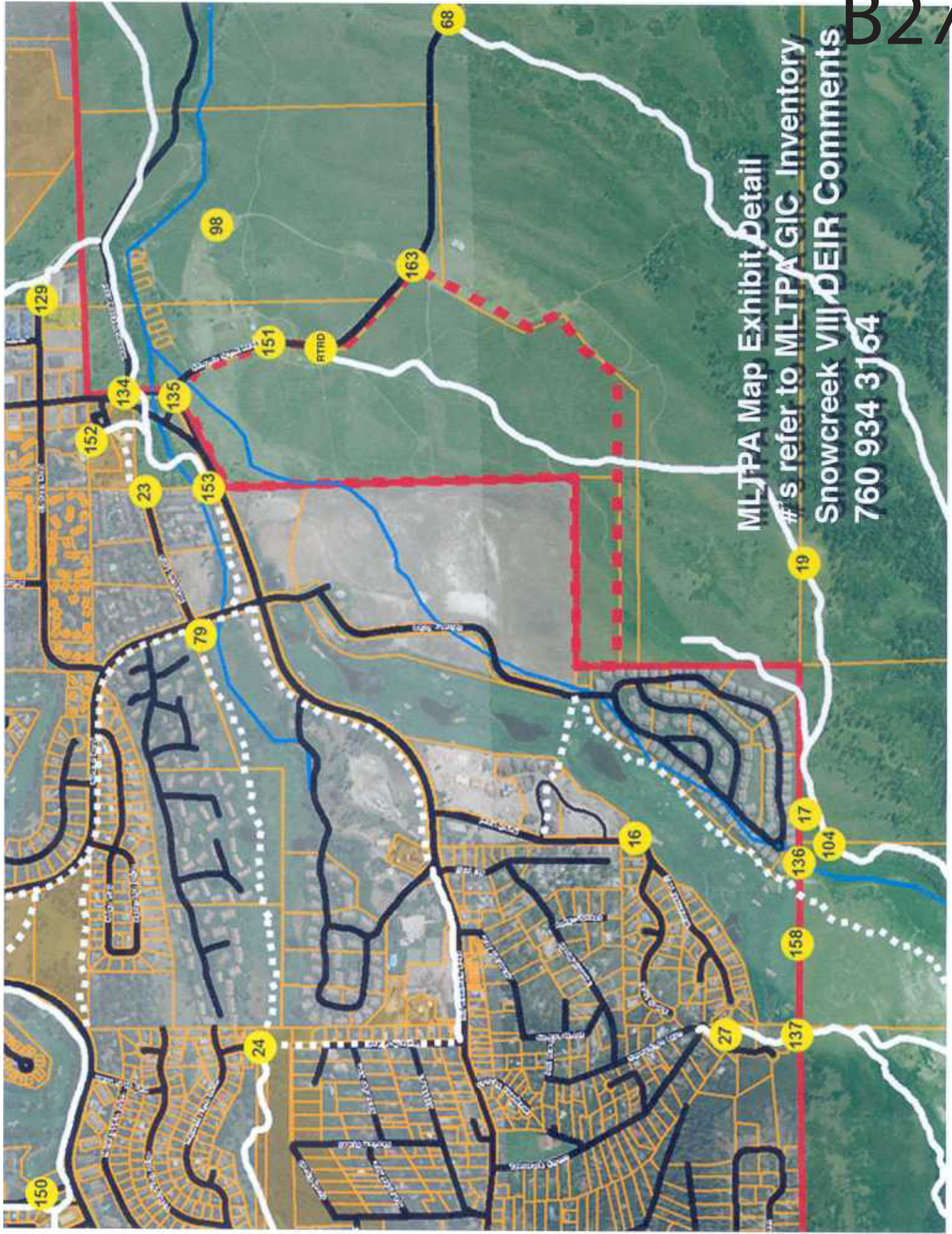
4. Next Steps

Mammoth Lakes has developed key pieces of its trails and public-access system, with a combination of singletrack trails, in-town shared-use paths, and access to the surrounding public lands. The existing trails form the foundation for an interconnected system that will allow residents and visitors to use trails for transportation, recreation, physical fitness, education, sport, and other purposes. Based on the ideas developed at the 2006 Strategic Conference, Mammoth Lakes will move forward with a new vision of trails and public access.

This document is the “trail map” for a world-class trails and public-access system. Organizing MLTPA as a sustainable non-profit organization, developing the community’s partnership triangle, creating a Trails and Public Access Master Plan, and integrating trails and public access into the General Plan Update, future mobility planning, and the plans being developed by both public- and private-sector partners are important next steps. By focusing on achievable actions in the short term, it will be possible to create success as the longer-term vision develops. With the enthusiasm, creativity, and leadership that developed this Action Plan, there is a great future for trails and public access in Mammoth Lakes.



These images of Mammoth Lakes from the week of the 2006 Strategic Conference highlight the diversity and potential of the region’s trails and public-access system.



MLTPA Map Exhibit Detail
#s refer to MLTPA GLC Inventory
Snowcreek VIII DEIR Comments
760 934 3164

POINT NAME Southern terminus of public right-of-way on Ranch Road, south of gate **New MLTPA #** 0016
Old MLTPA # 16

Point Location Southern terminus of public right-of-way on Ranch Road, south of gate

USFS Route Designation # —

Documented By: Pete Beck
Phone: (760) 934-9332
Alt Phone: —

Date: 9/3/06
Email: ffpbeck@yahoo.com

GENERAL

Summer Use ☐ N
 Winter Use ☐ N
 Urban Limit ☐ N
 Parking ☐ N
 Public Transport ☐ N
 Signage ☐ N
 Bathroom ☐ N

WINTER

Backcountry

General Access Point ☐ N
 Kicker Zone ☐ N
 Ski/Snowboard ☐ N
 Ski/Snowboard Access ☐ N
 Ski/Snowboard Egress ☐ N

Biathlon

☐ N

Dog Sledding

☐ N

Ice Climbing

☐ N

Ice Fishing

☐ N

Ice Skating

☐ N

MMSA

Access Point ☐ N

Egress Point ☐ N

Nordic

Groomed, Fee Area ☐ N

Groomed, Public ☐ N

Ungroomed, Public ☐ N

Pets

Area ☐ N

Walking ☐ N

Snowmachine

Trail ☐ N

Open Area ☐ N

Snowplay

Fee Area ☐ N

Public ☐ N

Snowshoe

Trail ☐ N

Open Area ☐ N

Vistas

☐ N

Winter Camping

☐ N

Winter Hiking/Walking

Groomed ☐ N

4-Season ☐ N

Workforce

☐ N

SUMMER

Automobiles

☐ N

Backcountry

General Access Point ☐ N

Biking

Unpaved ☐ N

Paved ☐ N

Road ☐ N

Birding

Boating Access

Motor ☐ N

Non-Motor ☐ N

Bouldering

Bow Hunting

☐ N

Camping

Tent ☐ N

RV ☐ N

Caving

Climbing

☐ N

Equestrian

Commercial Packing ☐ N

Packing ☐ N

Trail Riding ☐ N

Commercial Trail Riding ☐ N

Fall Color Viewing

Fishing

Lakes from Shore ☐ N

Streams/Creeks ☐ N

Frisbee Golf

Hiking/Walking

Paved ☐ N

Unpaved ☐ N

OHV

ATV ☐ N

Motorcycle ☐ N

Pets

Area ☐ N

Walking ☐ N

Running

Cross-Country ☐ N

Trail ☐ N

Swimming Access

Vistas

☐ N

Wildflowers

☐ N

Workforce

☐ N

NOTES:

Potential substantial winter egress point from Hidden Lake/Sherwins



Photo #1 Notes
Condition photo



Photo #2 Notes
Site photo



Photo #3 Notes
Site photo



Photo #4 Notes
Site photo

New MLTPA #
Old MLTPA #

0016
16

POINT NAME **Snowcreek V between units 757 and 758**

New MLTPA #
Old MLTPA #

0017
17

Point Location Snowcreek V between units 757 and 758

USFS Route Designation # —

Documented By: John Wentworth
Phone: (760) 934-1279
Alt Phone: (760) 934-3154

Date: 11/1/06
Email: johnwentworth@mltpa.org

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☒
Egress Point ☒

Nordic

Groomed, Fee Area ☒
Groomed, Public ☒
Ungroomed, Public ☒

Pets

Area ☒
Walking ☒

Snowmachine

Trail ☒
Open Area ☒

Snowplay

Fee Area ☒
Public ☒

Snowshoe

Trail ☒
Open Area ☒

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☒
4-Season ☒

Workforce

SUMMER

Automobiles

Backcountry

General Access Point ☒

Biking

Unpaved ☒
Paved ☒
Road ☒

Birding

Boating Access

Motor ☒
Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒
RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒

Packing ☒

Trail Riding ☒

Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒
Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒
Unpaved ☒

OHV

ATV ☒
Motorcycle ☒

Pets

Area ☒
Walking ☒

Running

Cross-Country ☒
Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce

NOTES:

Not sure if this point crosses private property; is this an HOA access point through the fence, or personal access?

Street Address
450 Fairway Dr. Unit # 757, 758



Photo #1 Notes
Site photo

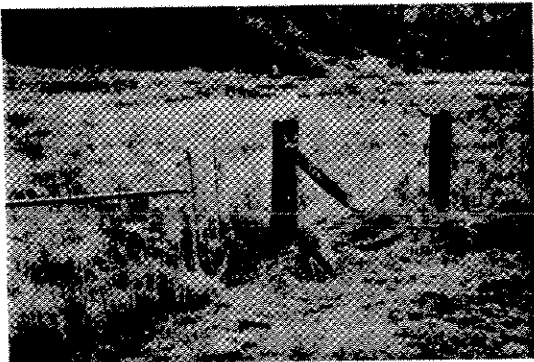


Photo #2 Notes
Site photo

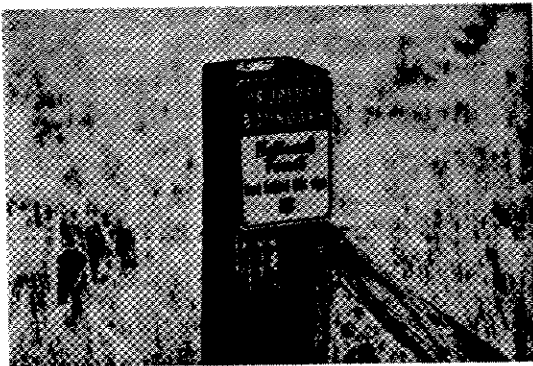


Photo #3 Notes
Site photo



Photo #4 Notes
Condition photo

New MLTPA #
Old MLTPA #

0017
17

POINT NAME Kerry Meadow

New MLTPA #

0019

Old MLTPA #

19

Point Location East of Snowcreek V

USFS Route Designation # —

Documented By: John Wentworth

Date: 11/1/06

Phone: (760) 934-3154

Email: johnwentworth@mltpa.org

Alt Phone: (760) 934-1279

GENERAL

Summer Use ☐ Y
Winter Use ☐ N
Urban Limit ☐ N
Parking ☐ Y
Public Transport ☐ N
Signage ☐ N
Bathroom ☐ N

WINTER

Backcountry

General Access Point ☐ N
Kicker Zone ☐ N
Ski/Snowboard ☐ N
Ski/Snowboard Access ☐ N
Ski/Snowboard Egress ☐ N

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☐ N
Egress Point ☐ N

Nordic

Groomed, Fee Area ☐ N
Groomed, Public ☐ N
Ungroomed, Public ☐ N

Pets

Area ☐ N
Walking ☐ N

Snowmachine

Trail ☐ N
Open Area ☐ N

Snowplay

Fee Area ☐ N
Public ☐ N

Snowshoe

Trail ☐ N
Open Area ☐ N

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☐ N
4-Season ☐ N

Workforce

☐ N

SUMMER

Automobiles

☐ Y

Backcountry

General Access Point ☐ Y

Biking

Unpaved ☐ Y
Paved ☐ N
Road ☐ N

Birding

Boating Access

Motor ☐ N
Non-Motor ☐ N

Bouldering

Bow Hunting

Camping

Tent ☐ N
RV ☐ N

Caving

Climbing

Equestrian

Commercial Packing ☐ N

Packing ☐ Y

Trail Riding ☐ Y

Commercial Trail Riding ☐ Y

Fall Color Viewing

Fishing

Lakes from Shore ☐ N
Streams/Creeks ☐ N

Frisbee Golf

Hiking/Walking

Paved ☐ N
Unpaved ☐ Y

OHV

ATV ☐ Y
Motorcycle ☐ Y

Pets

Area ☐ Y
Walking ☐ Y

Running

Cross-Country ☐ Y
Trail ☐ Y

Swimming Access

Vistas

Wildflowers

Workforce

☐ N

NOTES:

Public function area (weddings, etc.)

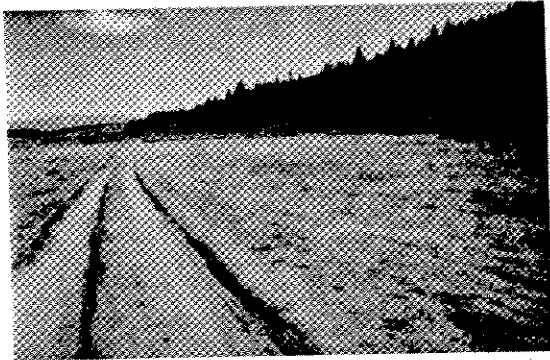


Photo #1 Notes

Condition photo

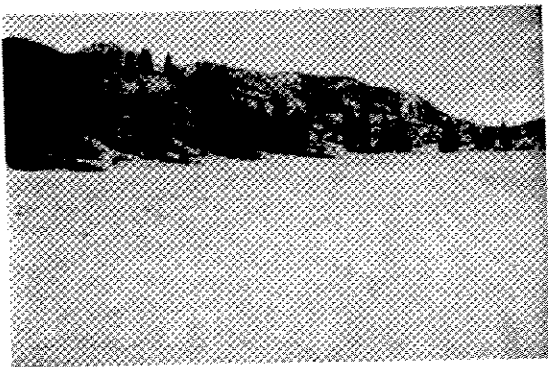


Photo #2 Notes

Site photo

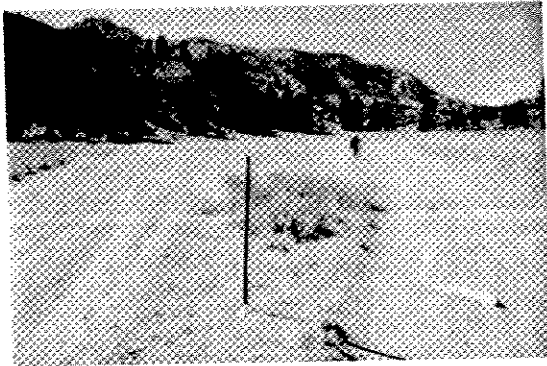


Photo #3 Notes

Site photo

Photo #4 Notes

New MLTPA #
Old MLTPA #

0019
19

POINT NAME Tamarack St.

New MLTPA #

0027

Old MLTPA #

27

Point Location Southern terminus of Tamarack St.

USFS Route Designation # —

Documented By: Pete Beck
Phone: (760) 934-9332
Alt Phone: —

Date: 9/3/06
Email: ffpbeck@yahoo.com

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

☒
Dog Sledding ☒
Ice Climbing ☒
Ice Fishing ☒
Ice Skating ☒

MMSA

Access Point ☒
Egress Point ☒

Nordic

Groomed, Fee Area ☒
Groomed, Public ☒
Ungroomed, Public ☒

Pets

Area ☒
Walking ☒

Snowmachine

Trail ☒
Open Area ☒

Snowplay

Fee Area ☒
Public ☒

Snowshoe

Trail ☒
Open Area ☒

Vistas

☒
Winter Camping ☒

Winter Hiking/Walking

Groomed ☒
4-Season ☒

Workforce ☒

SUMMER

Automobiles

☒

Backcountry

General Access Point ☒

Biking

Unpaved ☒
Paved ☒
Road ☒

Birding

Boating Access

Motor ☒
Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒
RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒

Packing ☒

Trail Riding ☒

Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒
Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒
Unpaved ☒

OHV

ATV ☒
Motorcycle ☒

Pets

Area ☒
Walking ☒

Running

Cross-Country ☒
Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce ☒

NOTES:

Open area about 100 yards from trailhead, which is about 100 feet down a private road

Photo #1 Notes

Signage photo



Photo #2 Notes

Condition photo



Photo #3 Notes

Site photo



Photo #4 Notes

Site photo



New MLTPA #
Old MLTPA #

0027
27

POINT NAME Mammoth Rock Trail at Sherwin
Creek Rd.

New MLTPA #
Old MLTPA #

0068
68

Point Location Mammoth Rock Trail, eastern terminus at
Sherwin Creek Rd.

USFS Route Designation # --

Documented By: John Wentworth
Phone: (760) 934-3154
Alt Phone: (760) 934-1279

Date: 10/3/06
Email: johnwentworth@mltpa.org

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☒
Egress Point ☒

Nordic

Groomed, Fee Area ☒
Groomed, Public ☒
Ungroomed, Public ☒

Pets

Area ☒
Walking ☒

Snowmachine

Trail ☒
Open Area ☒

Snowplay

Fee Area ☒
Public ☒

Snowshoe

Trail ☒
Open Area ☒

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☒
4-Season ☒

Workforce

SUMMER

Automobiles

Backcountry

General Access Point ☒

Biking

Unpaved ☒
Paved ☒
Road ☒

Birding

Boating Access

Motor ☒
Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒
RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒
Packing ☒

Trail Riding ☒
Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒
Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒
Unpaved ☒

OHV

ATV ☒
Motorcycle ☒

Pets

Area ☒
Walking ☒

Running

Cross-Country ☒
Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce

NOTES:

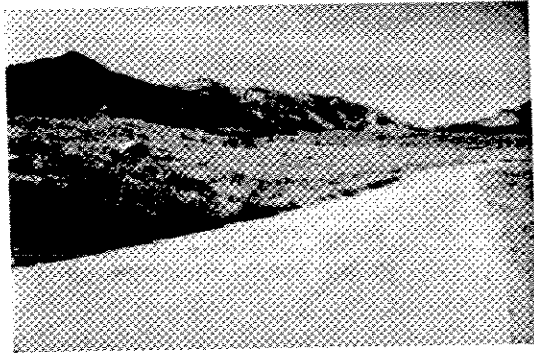


Photo #1 Notes

Site photo

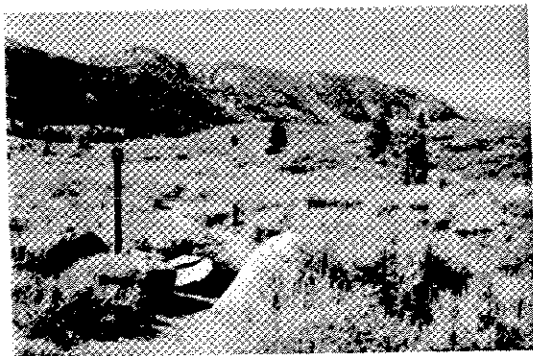


Photo #2 Notes

Site photo

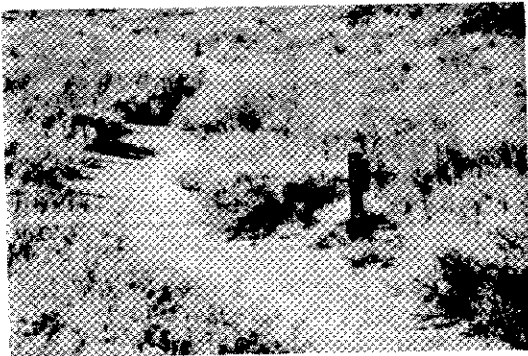


Photo #3 Notes

Condition photo

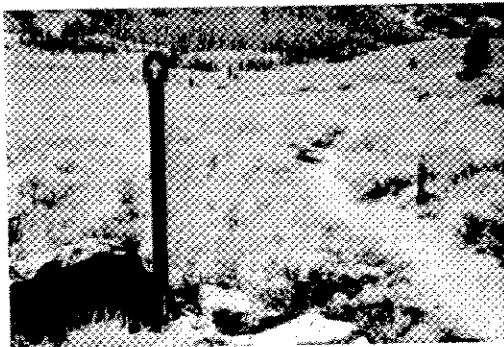


Photo #4 Notes

Signage photo

New MLTPA #
Old MLTPA #

0068
68

POINT NAME Hidden Lake meadow

New MLTPA #

0104

Old MLTPA #

Point Location Northeast corner of Hidden Lake meadow,
just south of Snowcreek V

USFS Route Designation # —

Documented By: John Wentworth/Kim Stravers/Hans Ludwig

Date: 8/18/06

Phone: (760) 934-3154

Email: kimstravers@mltpa.org

Alt Phone: (949) 632-7882

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

☒

Dog Sledding

☒

Ice Climbing

☒

Ice Fishing

☒

Ice Skating

☒

MMSA

Access Point ☒

Egress Point ☒

Nordic

Groomed, Fee Area ☒

Groomed, Public ☒

Ungroomed, Public ☒

Pets

Area ☒

Walking ☒

Snowmachine

Trail ☒

Open Area ☒

Snowplay

Fee Area ☒

Public ☒

Snowshoe

Trail ☒

Open Area ☒

Vistas

☒

Winter Camping

☒

Winter Hiking/Walking

Groomed ☒

4-Season ☒

Workforce

☒

SUMMER

Automobiles ☒

Backcountry

General Access Point ☒

Biking

Unpaved ☒

Paved ☒

Road ☒

Birding

Boating Access

Motor ☒

Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒

RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒

Packing ☒

Trail Riding ☒

Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒

Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒

Unpaved ☒

OHV

ATV ☒

Motorcycle ☒

Pets

Area ☒

Walking ☒

Running

Cross-Country ☒

Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce

☒

NOTES:

Photo #1 Notes

Signage photo



Photo #2 Notes

Condition photo

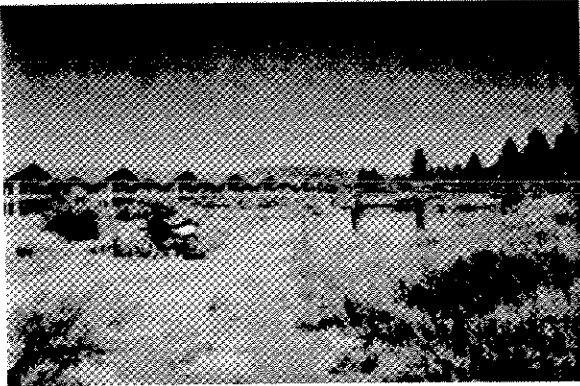


Photo #3 Notes

Condition photo

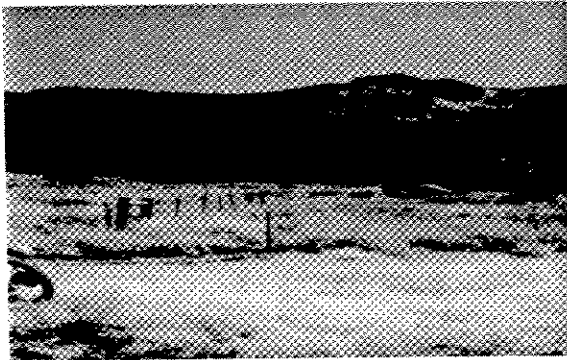
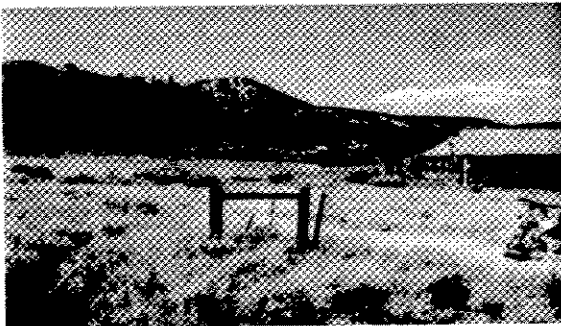


Photo #4 Notes

Site photo



New MLTPA #
Old MLTPA #

0104

—

POINT NAME Sherwin Creek Rd. near Old
Mammoth Rd., UGB

New MLTPA #
Old MLTPA #

0135

Point Location Sherwin Creek Rd. near Old Mammoth Rd.,
UGB

USFS Route Designation # —

Documented By: Greg Hadfield
Phone: (760) 709-1255
Alt Phone: —

Date: 9/22/06
Email: greghad@gmail.com

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☒
Egress Point ☒

Nordic

Groomed, Fee Area ☒
Groomed, Public ☒
Ungroomed, Public ☒

Pets

Area ☒
Walking ☒

Snowmachine

Trail ☒
Open Area ☒

Snowplay

Fee Area ☒
Public ☒

Snowshoe

Trail ☒
Open Area ☒

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☒
4-Season ☒

Workforce

SUMMER

Automobiles

Backcountry

General Access Point ☒

Biking

Unpaved ☒
Paved ☒
Road ☒

Birding

Boating Access

Motor ☒
Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒
RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒

Packing ☒

Trail Riding ☒

Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒
Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒
Unpaved ☒

OHV

ATV ☒
Motorcycle ☒

Pets

Area ☒
Walking ☒

Running

Cross-Country ☒
Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce

NOTES:

Urban limit point only

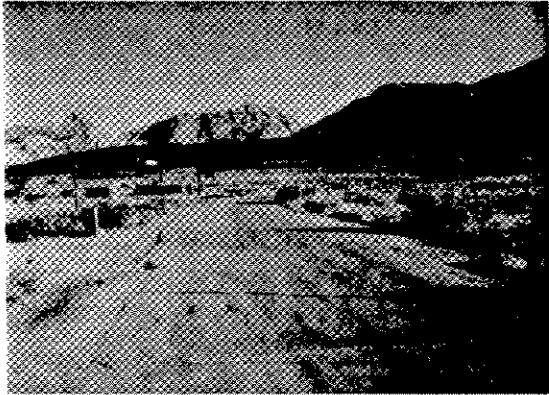


Photo #1 Notes
Site photo



Photo #2 Notes
Site photo

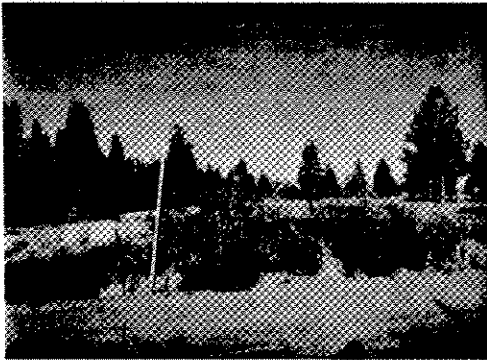


Photo #3 Notes
Site photo



Photo #4 Notes
Site photo

New MLTPA #
Old MLTPA #

0135
—

POINT NAME **Snowcreek V between units 747 and 748**

New MLTPA #
Old MLTPA #

0136

Point Location Snowcreek V between units 747 and 748

USFS Route Designation # —

Documented By: Greg Hadfield
Phone: (760) 709-1255
Alt Phone: —

Date: 9/24/06
Email: greghad@gmail.com

GENERAL

Summer Use ☐ Y
Winter Use ☐ Y
Urban Limit ☐ Y
Parking ☐ Y
Public Transport ☐ N
Signage ☐ N
Bathroom ☐ N

WINTER

Backcountry

General Access Point ☐ Y
Kicker Zone ☐ N
Ski/Snowboard ☐ Y
Ski/Snowboard Access ☐ Y
Ski/Snowboard Egress ☐ Y

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☐ N
Egress Point ☐ N

Nordic

Groomed, Fee Area ☐ N
Groomed, Public ☐ N
Ungroomed, Public ☐ Y

Pets

Area ☐ Y
Walking ☐ Y

Snowmachine

Trail ☐ N
Open Area ☐ N

Snowplay

Fee Area ☐ N
Public ☐ N

Snowshoe

Trail ☐ N
Open Area ☐ Y

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☐ N
4-Season ☐ Y

Workforce

☐ N

SUMMER

Automobiles

☐ N

Backcountry

General Access Point ☐ Y

Biking

Unpaved ☐ Y
Paved ☐ N
Road ☐ N

Birding

Boating Access

Motor ☐ N
Non-Motor ☐ N

Bouldering

Bow Hunting

Camping

Tent ☐ N
RV ☐ N

Caving

Climbing

Equestrian

Commercial Packing ☐ N

Packing ☐ N

Trail Riding ☐ N

Commercial Trail Riding ☐ N

Fall Color Viewing

Fishing

Lakes from Shore ☐ N
Streams/Creeks ☐ N

Frisbee Golf

Hiking/Walking

Paved ☐ N
Unpaved ☐ Y

OHV

ATV ☐ N
Motorcycle ☐ N

Pets

Area ☐ Y
Walking ☐ Y

Running

Cross-Country ☐ Y
Trail ☐ Y

Swimming Access

Vistas

Wildflowers

Workforce

☐ N

NOTES:

Corner house west of row that faces due south (runs east)

Parking limited, and only in summer
Private property

Street Address:
450 Fairway Drive Unit # 747, 748



Photo #1 Notes

Site photo



Photo #2 Notes

Site photo



Photo #3 Notes

Site photo



Photo #4 Notes

Site photo

New MLTPA #
Old MLTPA #

0136
—

POINT NAME **Tamarack St. at UGB**

New MLTPA #

0137

Old MLTPA #

Point Location Tamarack St. at UGB (access to Hidden Lake)

USFS Route Designation # —

Documented By: Greg Hadfield
Phone: (760) 709-1255
Alt Phone: —

Date: 9/24/06

Email: greghad@gmail.com

GENERAL

Summer Use ☒ Y
Winter Use ☒ Y
Urban Limit ☒ Y
Parking ☒ N
Public Transport ☒ N
Signage ☒ Y
Bathroom ☒ N

WINTER

Backcountry

General Access Point ☒ Y
Kicker Zone ☒ N
Ski/Snowboard ☒ Y
Ski/Snowboard Access ☒ Y
Ski/Snowboard Egress ☒ Y

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☒ N
Egress Point ☒ N

Nordic

Groomed, Fee Area ☒ N
Groomed, Public ☒ N
Ungroomed, Public ☒ Y

Pets

Area ☒ Y
Walking ☒ Y

Snowmachine

Trail ☒ N
Open Area ☒ Y

Snowplay

Fee Area ☒ N
Public ☒ N

Snowshoe

Trail ☒ N
Open Area ☒ Y

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☒ N
4-Season ☒ Y

Workforce

☒ N

SUMMER

Automobiles

☒ N

Backcountry

General Access Point ☒ Y

Biking

Unpaved ☒ Y

Paved ☒ N

Road ☒ N

Birding

Boating Access

Motor ☒ N

Non-Motor ☒ N

Bouldering

Bow Hunting

Camping

Tent ☒ N

RV ☒ N

Caving

Climbing

Equestrian

Commercial Packing ☒ N

Packing ☒ N

Trail Riding ☒ Y

Commercial Trail Riding ☒ N

Fall Color Viewing

Fishing

Lakes from Shore ☒ N

Streams/Creeks ☒ N

Frisbee Golf

Hiking/Walking

Paved ☒ N

Unpaved ☒ Y

OHV

ATV ☒ N

Motorcycle ☒ N

Pets

Area ☒ Y

Walking ☒ Y

Running

Cross-Country ☒ Y

Trail ☒ Y

Swimming Access

Vistas

Wildflowers

Workforce

☒ N

NOTES:

Private property

Due east of The Bluffs, on the fence line



Photo #1 Notes
Site photo



Photo #2 Notes
Site photo



Photo #3 Notes
Site photo



Photo #4 Notes
Site photo

New MLTPA #
Old MLTPA #

0137
—

POINT NAME Winter terminus of Sherwin Creek Rd. **New MLTPA #** 0151
Point Location Winter terminus of Sherwin Creek Rd. **Old MLTPA #** —

USFS Route Designation # —

Documented By: John Wentworth
Phone: (760) 934-3154
Alt Phone: (760) 934-1279

Date: 12/8/06
Email: johnwentworth@mltpa.org

GENERAL	SUMMER
Summer Use ☐	Automobiles ☐
Winter Use ☐	Backcountry
Urban Limit ☐	General Access Point ☐
Parking ☐	Biking
Public Transport ☐	Unpaved ☐
Signage ☐	Paved ☐
Bathroom ☐	Road ☐
WINTER	Birding ☐
Backcountry	Boating Access
General Access Point ☐	Motor ☐
Kicker Zone ☐	Non-Motor ☐
Ski/Snowboard ☐	Bouldering ☐
Ski/Snowboard Access ☐	Bow Hunting ☐
Ski/Snowboard Egress ☐	Camping
Biathlon ☐	Tent ☐
Dog Sledding ☐	RV ☐
Ice Climbing ☐	Caving ☐
Ice Fishing ☐	Climbing ☐
Ice Skating ☐	Equestrian
MMSA	Commercial Packing ☐
Access Point ☐	Packing ☐
Egress Point ☐	Trail Riding ☐
Nordic	Commercial Trail Riding ☐
Groomed, Fee Area ☐	Fall Color Viewing ☐
Groomed, Public ☐	Fishing
Ungroomed, Public ☐	Lakes from Shore ☐
Pets	Streams/Creeks ☐
Area ☐	Frisbee Golf ☐
Walking ☐	Hiking/Walking
Snowmachine	Paved ☐
Trail ☐	Unpaved ☐
Open Area ☐	OHV
Snowplay	ATV ☐
Fee Area ☐	Motorcycle ☐
Public ☐	Pets
Snowshoe	Area ☐
Trail ☐	Walking ☐
Open Area ☐	Running
Vistas ☐	Cross-Country ☐
Winter Camping ☐	Trail ☐
Winter Hiking/Walking	Swimming Access ☐
Groomed ☐	Vistas ☐
4-Season ☐	Wildflowers ☐
Workforce ☐	Workforce ☐

NOTES:

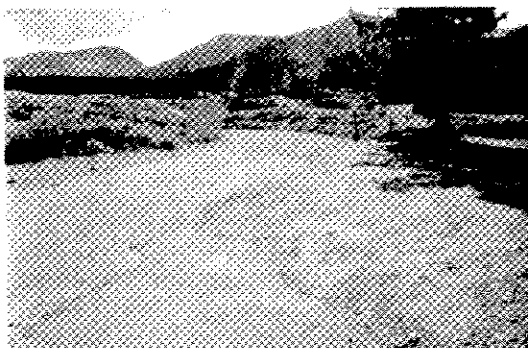


Photo #1 Notes

Site photo



Photo #2 Notes

Signage photo



Photo #3 Notes

Condition photo

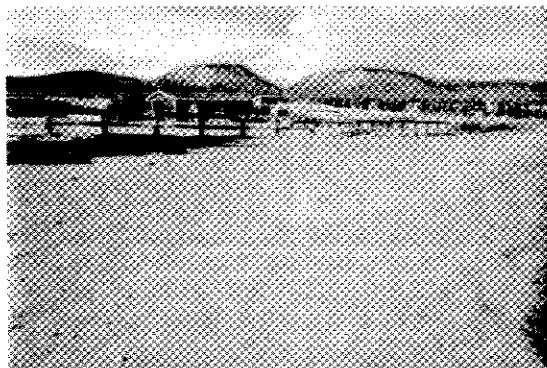


Photo #4 Notes

Site photo

New MLTPA #
Old MLTPA #

0151
—

POINT NAME **MLTS Main Path western terminus parallel to Old Mammoth Rd.** **New MLTPA #** **0153**
Point Location MLTS Main Path western terminus parallel to Old Mammoth Rd. **Old MLTPA #** **—**

USFS Route Designation # **—**

Documented By: Sharon and Malcolm Clark
Phone: (760) 924-5639
Alt Phone: —

Date: 9/22/06
Email: srclark@npgcable.com

GENERAL		SUMMER	
Summer Use	☒	Automobiles	☐
Winter Use	☐	Backcountry	
Urban Limit	☐	General Access Point	☐
Parking	☐	Biking	
Public Transport	☐	Unpaved	☐
Signage	☐	Paved	☒
Bathroom	☐	Road	☐
WINTER		Birding	
Backcountry		Boating Access	
General Access Point	☐	Motor	☐
Kicker Zone	☐	Non-Motor	☐
Ski/Snowboard	☐	Bouldering	☐
Ski/Snowboard Access	☐	Bow Hunting	☐
Ski/Snowboard Egress	☐	Camping	
Biathlon	☐	Tent	☐
Dog Sledding	☐	RV	☐
Ice Climbing	☐	Caving	☐
Ice Fishing	☐	Climbing	☐
Ice Skating	☐	Equestrian	
MMSA		Commercial Packing	☐
Access Point	☐	Packing	☐
Egress Point	☐	Trail Riding	☐
Nordic		Commercial Trail Riding	☐
Groomed, Fee Area	☐	Fall Color Viewing	☐
Groomed, Public	☐	Fishing	
Ungroomed, Public	☐	Lakes from Shore	☐
Pets		Streams/Creeks	☐
Area	☐	Frisbee Golf	☐
Walking	☐	Hiking/Walking	
Snowmachine		Paved	☒
Trail	☐	Unpaved	☐
Open Area	☐	OHV	
Snowplay		ATV	☐
Fee Area	☐	Motorcycle	☐
Public	☐	Pets	
Snowshoe		Area	☐
Trail	☐	Walking	☒
Open Area	☐	Running	
Vistas	☐	Cross-Country	☒
Winter Camping	☐	Trail	☐
Winter Hiking/Walking		Swimming Access	☐
Groomed	☐	Vistas	☐
4-Season	☐	Wildflowers	☐
Workforce	☐	Workforce	☐

NOTES:

Informal trail continues west to Minaret and Old Mammoth Rd.; private (foot-only sign) trail across Minaret on north side of Mammoth Creek park (Snowcreek property)
Pull-off on south side of Old Mammoth Rd.



Photo #1 Notes

Signage photo

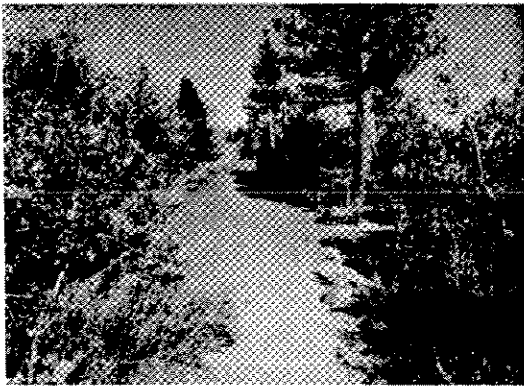


Photo #2 Notes

Site photo



Photo #3 Notes

Site photo



Photo #4 Notes

Site photo

New MLTPA #
Old MLTPA #

0153

—

POINT NAME **Path along Snowcreek V fence line** **New MLTPA #** **0158**
Old MLTPA # **—**

Point Location Pathway following fence line from Tamarack
St. to SW corner of Snowcreek V

USFS Route Designation # **—**

Documented By: Greg Hadfield
Phone: (760) 709-1255
Alt Phone: —

Date: 9/24/06
Email: greghad@gmail.com

GENERAL

Summer Use **N**
Winter Use **Y**
Urban Limit **Y**
Parking **N**
Public Transport **N**
Signage **N**
Bathroom **N**

WINTER

Backcountry

General Access Point **N**
Kicker Zone **N**
Ski/Snowboard **N**
Ski/Snowboard Access **N**
Ski/Snowboard Egress **Y**

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point **N**
Egress Point **N**

Nordic

Groomed, Fee Area **N**
Groomed, Public **N**
Ungroomed, Public **N**

Pets

Area **N**
Walking **N**

Snowmachine

Trail **N**
Open Area **N**

Snowplay

Fee Area **N**
Public **N**

Snowshoe

Trail **N**
Open Area **N**

Vistas

Winter Camping

Winter Hiking/Walking

Groomed **N**
4-Season **N**

Workforce

N

SUMMER

Automobiles

N

Backcountry

General Access Point **N**

Biking

Unpaved **N**
Paved **N**
Road **N**

Birding

Boating Access

Motor **N**
Non-Motor **N**

Bouldering

Bow Hunting

Camping

Tent **N**
RV **N**

Caving

Climbing

Equestrian

Commercial Packing **N**
Packing **N**
Trail Riding **N**
Commercial Trail Riding **N**

Fall Color Viewing

Fishing

Lakes from Shore **N**
Streams/Creeks **N**

Frisbee Golf

Hiking/Walking

Paved **N**
Unpaved **N**

OHV

ATV **N**
Motorcycle **N**

Pets

Area **N**
Walking **N**

Running

Cross-Country **N**
Trail **N**

Swimming Access

Vistas

Wildflowers

Workforce

N

NOTES:

Private property



Photo #1 Notes
Site photo



Photo #2 Notes
Site photo



Photo #3 Notes
Site photo



Photo #4 Notes
Site photo

New MLTPA #
Old MLTPA #

0158
—

POINT NAME Burrow Pit/Kerry Meadow access
at Sherwin Creek Rd.

New MLTPA #
Old MLTPA #

0163

Point Location Burrow Pit/Kerry Meadow access at Sherwin
Creek Rd.

USFS Route Designation # —

Documented By: John Wentworth
Phone: (760) 934-3154
Alt Phone: (760) 934-1279

Date: 11/2/06
Email: johnwentworth@mltpa.org

GENERAL

Summer Use ☒
Winter Use ☒
Urban Limit ☒
Parking ☒
Public Transport ☒
Signage ☒
Bathroom ☒

WINTER

Backcountry

General Access Point ☒
Kicker Zone ☒
Ski/Snowboard ☒
Ski/Snowboard Access ☒
Ski/Snowboard Egress ☒

Biathlon

Dog Sledding

Ice Climbing

Ice Fishing

Ice Skating

MMSA

Access Point ☒
Egress Point ☒

Nordic

Groomed, Fee Area ☒
Groomed, Public ☒
Ungroomed, Public ☒

Pets

Area ☒
Walking ☒

Snowmachine

Trail ☒
Open Area ☒

Snowplay

Fee Area ☒
Public ☒

Snowshoe

Trail ☒
Open Area ☒

Vistas

Winter Camping

Winter Hiking/Walking

Groomed ☒
4-Season ☒

Workforce

SUMMER

Automobiles

Backcountry

General Access Point ☒

Biking

Unpaved ☒
Paved ☒
Road ☒

Birding

Boating Access

Motor ☒
Non-Motor ☒

Bouldering

Bow Hunting

Camping

Tent ☒
RV ☒

Caving

Climbing

Equestrian

Commercial Packing ☒

Packing ☒

Trail Riding ☒

Commercial Trail Riding ☒

Fall Color Viewing

Fishing

Lakes from Shore ☒
Streams/Creeks ☒

Frisbee Golf

Hiking/Walking

Paved ☒
Unpaved ☒

OHV

ATV ☒
Motorcycle ☒

Pets

Area ☒
Walking ☒

Running

Cross-Country ☒
Trail ☒

Swimming Access

Vistas

Wildflowers

Workforce

NOTES:

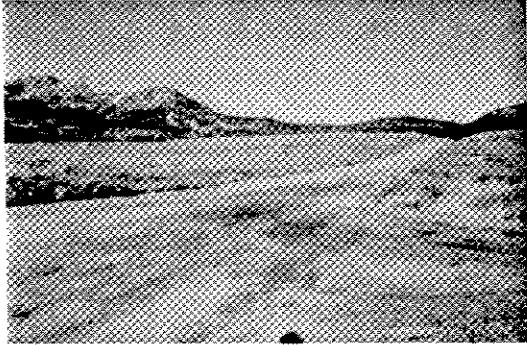


Photo #1 Notes

Site photo



Photo #2 Notes

Signage photo

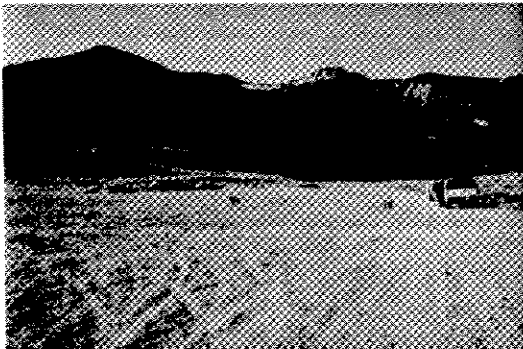


Photo #3 Notes

Site photo



Photo #4 Notes

Condition photo

New MLTPA #
Old MLTPA #

0163
—



Contractual Services
Agreement
Between
The Town of Mammoth Lakes
And
Mammoth Lakes Trails and Public Access

The agreement is entered into this ___3rd___ day of _October_, 2007 between the Town of Mammoth Lakes (referred to as TOML), a municipal corporation, and Mammoth Lakes Trails and Public Access (referred to as MLTPA), a 501(c)(3) public benefit corporation.

PURPOSE:

The purpose of the document is to establish an agreement between the TOML and MLTPA to conduct data control and collection, public advocacy and public outreach services for the Concept and Master Planning (CAMP)/Trails Master Planning process.

MLTPA CONTRACTUAL SERVICES:

MLTPA's duties and obligations under this agreement shall include, but are not limited to:

1. Ongoing data-coordination and collection services through the MLTPA Data Library throughout the duration of the first phase of the Trails Master Planning process.

This process is scheduled to be completed by June 2008. These data services include access to a central repository of GIS data and development of data collection protocols, jurisdictional and planning documents relevant to the Trails Master Planning process in both digital and analog formats and the ability to acquire, duplicate and distribute documents, materials and data as the planning process moves forward. Additionally, MLTPA will maintain server and FTP capacity for collection and distribution of large digital files.

2. Maintain capacity for production of graphic materials and exhibits that may be used as part of the public outreach effort during the Trails Master Planning Process. This capacity is meant to be maintained for specific projects requested by the Trails Master Planning partners.

3. Coordination of logistical needs as part of the Trails Master Planning process. This will include scheduling and facilitation of partner meetings including conference calls and/or video conferencing, minutes and documentation of partner meetings, coordination of consultant travel arrangements and on-site guiding services during consultant visits and coordination of volunteer efforts relative to the Trails Master Planning process.
4. Develop and organize public meetings specific to the needs of the Trails Master Planning process. This includes a Summer CAMP workshop and a Winter CAMP workshop, both designed to solicit input from the community with respect to seasonal trail use and provide the community with pertinent information with regards to the Trails Master Planning process. The need for additional public meetings will be identified with input from the planning partners.
5. Develop a media campaign, in collaboration with TOML staff as needed, to encourage public participation during the Trails Master Planning process. This includes using all available media channels ~ print, radio, television and internet.

MLTPA will use their website (www.mltpa.org) for posting of message boards, photo galleries, calendar of events, interactive maps and access to documents as part of the Trails Master Planning process.

COMPENSATION:

In consideration of the services performed by MLTPA, the Town will make payments as follows:

- a. Commencing with the execution of this contract, the Town shall disburse to MLTPA an amount as indicated below:
\$25,000.00
The Town shall process a request for payment once the contract is signed by both parties.
- b. This agreement shall not prevent the Town from appropriating additional sums for specific projects which the Town may desire to have performed by MLTPA.

FINANCIAL RECORDKEEPING AND REPORTING:

The Town shall have the right to audit the books, records and accounts of MLTPA at any reasonable time, as coordinated with the president/ executive director of MLTPA.

POLITICAL ACTIVITY:

MLTPA shall not use any monies received under this agreement for the endorsement, opposition or participation in any public office campaign or other political or lobbyist activity.

HOLD HARMLESS:

MLTPA shall indemnify and hold harmless the Town, its officers, employees and agents or claim of liability, including attorneys' fees, arising by reason of personal injury, death or property damage and resulting from MLTPA's negligence, recklessness or willful misconduct, or that of its officers or employees in the performance of its duties and obligations under this agreement.

LIABILITY INSURANCE:

MLTPA agrees to maintain limits no less than:

General Liability: \$1,000,000 per occurrence for bodily injury, personal injury and property damage. If Commercial General Liability Insurance or other form with a general aggregate limit is used, either the general aggregate limit shall apply separately to this agreement or the general aggregate limit shall be twice the required occurrence limit.

Workers Compensation: MLTPA shall provide the TOML with proof of coverage for worker's compensation insurance for MLTPA's employee (s)

Verification of Coverage: MLTPA shall furnish the Town with original endorsements effecting coverage required by this clause. The endorsements are to be signed by a person authorized by that insurer to bind coverage on its behalf. All endorsements are to be received and approved by the Town before work commences. Town reserves the right to require complete, certified copies of all required insurance policies, including endorsements affecting the coverage required by these specifications.

GENERAL PROVISIONS:

This Agreement is the entire understanding of the parties and there are not other terms or conditions, written or oral, controlling this matter.

This Agreement shall be governed by the laws of the State of California.

If any portion of this Agreement or application thereof to any person or circumstances shall be declared invalid by a court of competent jurisdiction, or if it is found in contravention of any federal, state, or district statute, ordinance or regulation, the remaining provisions of this Agreement, or the application thereof, shall not be invalidated thereby and shall remain in full force and effect to the extent that the provisions of the Agreement are severable.

This Agreement may be modified or amended, by the mutual written consent of the parties hereto.

The term of this Agreement shall be from the date of execution as noted above to June 30, 2008, or through the completion of the Trails Master Planning project, whichever

comes first. At that time, the contractual services agreement will be evaluated by both parties to determine a desire to renew the agreement for the following year.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the day and year first above written.

Dated: _____

Dated: 10-9-07

Town of Mammoth Lakes

By: Robert F. Clark, Town Manager

Mammoth Lakes Trails and Public Access

MEMORANDUM OF UNDERSTANDING BETWEEN

United States Forest Service
 Town of Mammoth Lakes
 County of Mono
 Mammoth Community Water District
 Mammoth Lakes Fire Protection District
 Mammoth Mountain Ski Area
 National Park Service
 California Department of Transportation,
 City of Los Angeles
 California Lahontan Regional Water Quality Control Board,
 Mammoth Lakes Trails and Public Access

I. PARTIES.

The Parties to this MEMORANDUM OF UNDERSTANDING (MOU) are as set forth above. This MOU is a non-binding document which reflects the interest of each of the Parties in cooperatively pursuing the Purpose of this MOU as set forth in Section II. Each of the Parties has jurisdiction over or influence affecting the lands and waters in and surrounding the Town which may be accessible by members of the public for recreation and enjoyment.

When meeting or acting in their collective capacities, the Parties are referred to below and may be referred to publicly as the "Mammoth Lakes Trails and Public Access Commission." ["Trails Commission" for purposes of this MOU].

This MOU is formally known as the "Mammoth Lakes Trails and Public Access Memorandum of Understanding". ["Trails Commission MOU" for purposes of this MOU]. It may be referred to publicly as the "MLTPA MOU."

II. PURPOSE; AREA OF INFLUENCE.

The Town contains and is surrounded by forests, meadows, lakes and waterways that constitute some of the most accessible, pristine public lands in the Sierra, and indeed in the country. All Parties to this MOU have an interest in preserving these lands on behalf of the public, and the public has a right to enjoy the experiences these lands can provide.

Therefore, the Purpose of this MOU is to establish and provide a working public/private cooperative framework, or *collaborative planning process*, directed toward the *establishment and maintenance of a system of public trails providing reasonable access to and enjoyment of public lands that are both within and surround the Town.*

The Town's Area of Influence consists of approximately 125 square miles of land surrounding the Town. Subject to more precise planning or mapping, that shall become the Area of Influence for the application of this MOU and any agreements among the parties, or any of them, which may come about as a result of this MOU.

II. CONSISTENCY WITH APPLICABLE LAWS.

Public lands are owned by the people and held in trust for them by various governmental agencies created by them. The people have a right to enjoy those lands consistent with applicable laws governing their use by and preservation for all the people. Unless otherwise agreed by an affected Party, this MOU is meant to be applied and interpreted in a manner consistent with all applicable laws, charters and ordinances, and by rules and regulations promulgated by any agency which is a Party to this MOU, and by the budget policies of any such agency. It is understood that no action by the Trails Commission shall be binding on any such agency without the consent of its governing body or relevant authorizing agent.

III. THE COLLABORATIVE PLANNING CONCEPT.

The individual Parties to this MOU have various responsibilities with respect to the issue of access to public lands. Each Party recognizes, however, that in carrying out those responsibilities, its efforts may be enhanced by joint planning and general cooperation with the other entities which have jurisdiction over or influence on activities within the Area of Influence.

All Parties agree that collaborative planning in selected areas of emphasis may have a synergistic effect that enhances the efforts of any one Party. For example, in order to avoid confusion on the part of members of the public seeking access to public lands, it would be desirable to have a consistent, integrated system of trails, trail-marking and signage. This would in turn engender confidence in members of the public that their governmental agencies are working harmoniously in the public interest.

A collaborative planning process presupposes significant involvement of members of the public at every reasonable opportunity. Therefore, to the extent necessary to carry out the objectives of this MOU, the Parties agree to schedule and publicly notice meetings to discuss planning concepts as well as specific plans which may be recommended for implementation by agencies or entities which are party to this MOU. Members of the public will be urged to actively participate in the meetings.

The Parties to this MOU agree that their representatives participating in meetings and actions of the Trails Commission shall refer all matters requiring action by a Party to that Party's decision-making body or agent. For example, matters requiring action by the Town shall be referred to the Town Council; matters requiring action by the USFS shall be referred to the Forest Supervisor (or such other person whose approval is required). The Parties further agree that they will take reasonably expeditious action on any such matters.

IV. PROCEDURES.

The Parties to this MOU may adopt Rules and Procedures for the conduct of the business and meetings of the Trails Commission. Otherwise actions shall be taken by a majority of those Parties present and voting at a meeting called for the purpose of taking action under or implementing any of the provisions of this MOU or any recommendations to the governing bodies or authorized agents of the parties to this MOU.

Since the purpose is so well defined and so obviously for the greater good of the public, the procedural goal of the Parties is to create a system which operates by consensus on the basis of open, intelligent discussion without the rancor and recrimination which often occurs in public debate. Meetings will be conducted and actions taken in that spirit.

V. AREAS OF EMPHASIS.

A. Evolving Process.

As the Trails Commission pursues its objectives under this MOU, it will develop various plans and implementation strategies for recommendation to the governing bodies or authorized agents of the Parties to this MOU. Its efforts will evolve in response to its deliberations and to information and ideas offered by members of the public and other interested entities and agencies.

B. Initial Areas of Emphasis.

A first task of the Trail Commission will be to develop, hold public hearings on as deemed by the Parties to be necessary, and adopt a list of initial areas of emphasis relevant to the Purpose of this MOU.

VI. GENERAL MATTERS.

A. Freedom of Information Act (FOIA).

Any information furnished to the United States Forest Service under this MOU is subject to the Freedom of Information Act (FOIA).

B. Participation in Similar Activities.

This MOU in no way restricts any Party hereto from participating in similar activities with other public or private agencies, organizations, and/or individuals.

C. Commencement; Expiration; Termination.

This MOU takes effect upon the date the last of the signatories hereto has executed this MOU and shall remain in effect for a period of five (5) years from such date unless extended. This MOU may be extended or amended upon request of any party hereto and the further written agreement of each Party. Any Party to this MOU may terminate its participation in this MOU, and remove itself as a Party hereto, by written notice the other Parties.

D. Responsibilities of Parties.

The Parties to this MOU and their respective agencies, officers, employees and/or agents will handle their own activities and utilize their own resources, including the expenditure of their own funds, in pursuing the purposes herein set forth. Each party will carry out its separate activities in a coordinated and mutually beneficial manner.

E. Principal Contacts of Parties.

The principal contacts of each Party to this MOU are set forth on Exhibit A attached hereto.

F. Non-Fund Obligating Document.

Nothing in this MOU shall obligate any Party hereto to obligate or transfer funds. Specific work projects or activities that involve the transfer of funds, services, or property between or among the Parties, or any of them, will require execution of separate agreements and be contingent upon the availability of appropriate funds, any must be independently authorized by the appropriate statutory authority, where applicable under the practices, rules or regulations of any Party.

G. Establishment of Responsibility.

This MOU is not intended to and does not create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity, by any Party against any other Party, or its agencies, officers, employees, or agents, or any individual.

H. Authorized Representatives.

By signature below, the each Party certifies that the individuals signing this document on behalf of such Party, or listed in this documents as a contact for such Party, are authorized to act in their respective areas for matters related to this MOU.

WHEREFORE, the Parties to this MOU execute the same as set forth hereinafter. This MOU may be executed in counter-parts, each of which shall be deemed an original and which shall be retained by the Trails Commission.

Exhibit A: Trails Commission Signatories

Inyo National Forest

Name: _____

Position: _____

Town of Mammoth Lakes

Name: _____

Position: _____

Name: _____

Position: _____

County of Mono

Name: _____

Position: _____

Mammoth Community Water District

Name: _____

Position: _____

Mammoth Lakes Fire Protection District

Name: _____

Position: _____

Mammoth Mountain Ski Area

(P)

[Handwritten Signature]

Name: _____

Position: _____

National Park Service

Name: _____

Position: _____

California Department of Transportation

Name: _____

Position: _____

City of Los Angeles

Name: _____

Position: _____

California Lahontan Regional Water Quality Control Board

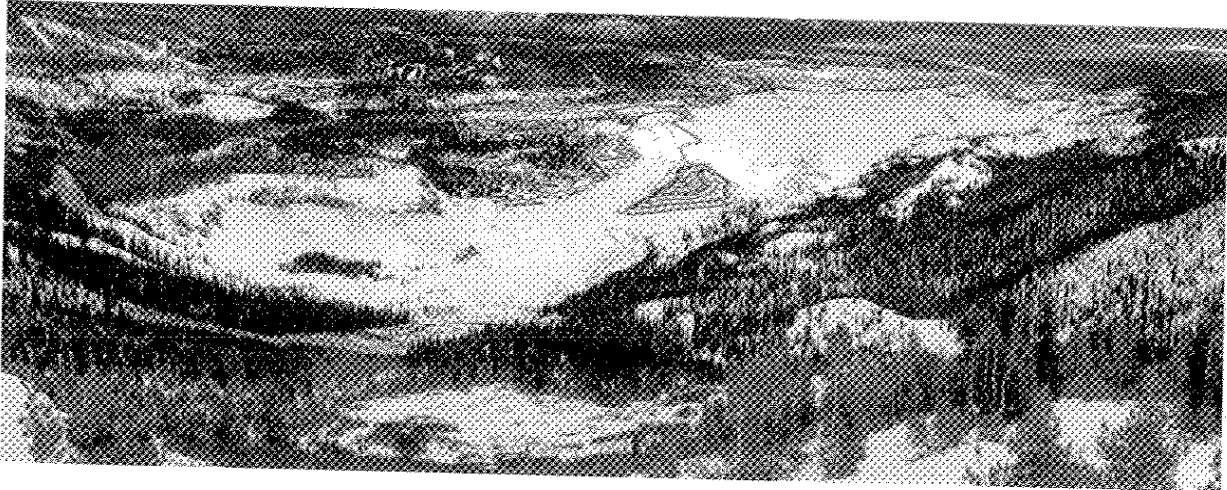
Name: _____

Position: _____

Mammoth Lakes Trails and Public Access

Name: _____

Position: _____



Mammoth Lakes Trails and Public Access

Sherwins Working Group - Golf Course Winter Passage Resources

Introduction

Nicholas North Golf Course - Whistler

Vail Golf Club - Vail

Park City Golf Club - Park City

Chateau Whistler Golf Course - Whistler

Yellowstone Track Systems - Ginzugroomer

Alpina Sherpa Dual Track Snowmobiles

August 10, 2006



PO Box 100 PMB# 432
Mammoth Lakes, CA 93546
760 934 3154
mlipa.org



Mammoth Lakes Trails and Public Access

Sherwins Working Group - Golf Course Winter Passage Resources

Introduction

Nicholas North Golf Course - Whistler

Vail Golf Club - Vail

Park City Golf Club - Park City

Chateau Whistler Golf Course - Whistler

Yellowstone Track Systems - Ginzugroover

Alpina Sherpa Dual Track Snowmobiles

August 10, 2006



PO Box 100 PMB# 432
Mammoth Lakes, CA 93546
760 934 3154
mlpa.org

August 10, 2006

TO: The Sherwins Working Group
FROM: John Wentworth
RE: Resources for Golf Course Winter Passage

Dear Members of the Sherwins Working Group,

There has been much discussion about the Gate on Ranch Road and the characterization that any Public Pedestrian Access Easement doesn't make a lot of sense because "it doesn't go anywhere". This is true – the public right of way at its southern terminus is surrounded by private property. This does not negate the fact that Ranch Road is a key access point to the Sherwins and the best point of access between the Sherwins and public transportation.

With this in mind, attached are several documents that pertain to passage over golf courses during the winter months when snow is on the ground. I have had lengthy conversations with the managers of four golf courses whose facilities see extensive activity during the winter – I have synopsized these conversations for your reference and edification. Their phone numbers are included. I have also attached documentation from manufacturers of equipment that could be helpful in creating a functioning and sustainable system of access to the Sherwins during the wintertime, across a golf course or any other open stretch of snow covered land.

We are at a critical juncture in the culture of our community. I don't need to emphasize how important and exciting it will be to create a well thought out and functioning system of access to the Sherwins, an aesthetic as well as key economic amenity to our town.

Best –

John Wentworth

Golf Course – Nicholas North Golf Course – Whistler, BC

Contact – Jeff McLean

Title – Golf Course Superintendent

Telephone # - 1 604 905 8720 (c) 1 604 932 6056 (o)

Winter Use

NORDIC SKI/WINTER HIKING TRACK – During the Winter Months, a Nordic and Winter hiking system is established over the Nicholas North Golf Course. The Municipality of Whistler had previously established a legal interest in the cart paths of the golf course and this is where the Nordic and Winter Hiking activities take place. The winter track is staked out in the fall season and strictly follows the cart paths. The winter track is groomed with a Piston Bully snow cat and due to the weight and possible impact of the machine, the groomed track strictly follows the cart paths. Jeff McLean emphasized that his crew goes to extra lengths to make sure that the cart path/winter track is well marked in advances, even adding extra bamboo poles around curves so as to prevent “wandering” of the winter track during the winter months. He estimated that his crews puts up hundreds, possibly thousands of bamboo stakes for the winter track.

WINTER TRACK GROOMING DEPTH – Jeff McLean and his crew do no grooming of the winter track until 1 foot of snow is present on the cart paths. They also use a snowmobile towing a metal sled in situations where snow depth may be marginal.

WINTER TRACK GROOMING DAMAGE – Mr McLean says that there is no lasting damage to his golf course from winter activities and the winter track. Where there is damage, due to the winter track straying from the cart path route or other activity, he resods those sections of the course where necessary. He represented that his golf season is so short that he must do what it takes to get things operational for the golf season as quickly as possible, and he doesn't have time for grass to reseed. In instances where they have used the snowmobile and sled in lieu of the Piston Bully, there has been no damage to the grass or the golf course.

NOTES – Mr McLean is happy with winter operations on his golf course and their lack of impact on his summer golf course usability. He believes this is due to several years of experience and fine tuning – “getting the kinks out” - methods and tools to mitigate damage which could be done to the golf course during the winter months. He believes that is important to establish known and defined routes over a golf course if it is to be used for any winter activities rather than allowing traffic to proceed arbitrarily. When asked about devising a system for backcountry skiers and snowboarders to cross a golf course, he represented that that should not be a difficult task, especially if marking the course in advance and using a light weight and minimal impact device such as a snowmobile towing a metal sled to establish the track. Marking out the track in advance, establishing the track once a minimum snow depth has been established, and maintaining the track would be key elements in a functioning system, he believed.

John Wentworth spoke with Dan Nash on Thursday, August 10, 2006

Golf Course – Vail Golf Club

Contact – Steve Sarrow

Title – Golf Superintendent

Telephone # - 970 331 2664

Winter Use

On or about Thanksgiving, the Vail Golf Club stakes out the trails that will be used for winter use – this includes a Nordic system as well as a snowshoe/winter walking trail. The staking out of the trail system well in advance of any snowfall ensures that the grooming of the winter trail system will have as little impact on the golf course as possible. Course staff make sure that the winter traffic will go where they want it to go.

NORDIC TRAILS - The Nordic trails as staked out typically go all over the golf course with the exception of greens. Priority is given to routing the trails over cart paths and roughs – fairways are crossed if necessary and even tee boxes. In the winter months, the Nordic trails are groomed with a Snowcat to create a “classic” track for Nordic Skiing. This is not a full size machine as may be seen in the ski resort, but still a sizeable and heavy piece of equipment.

NORDIC TRAILS GROOMING DEPTH – No grooming with the Snowcat takes place until an average snow depth of 24” is on the course. Steve estimates that the Vail Golf club gets 300 – 400 inches of snow per winter.

NORDIC GROOMING DAMAGE – Mr Sarrow represented that there was little or no damage to the grass of the course but explained that was due to the fact that staking out the course in the fall was critical. He did mention damage to old sprinkler heads and even old water pipes that could not stand up to the weight of the Snow cat. He mentioned that his course has an older irrigation system

SNOWSHOE/WINTER WALKING TRAIL – The snowshoe trail is staked in a similar manner as the Nordic trails, but the trail is not nearly as ambitious and the traffic is not as heavy.

SNOWSHOE/WINTER WALKING TRAIL GROOMING DEPTH – Mr Sarrow did not mention a separate depth for grooming the snowshoe trail vs the Nordic Trail.

SNOWSHOE/WINTER WALKING TRAIL GROOMING – The snowshoe trail is groomed with a snowmobile towing a sled. He couldn't describe the make or model of the sled.

SNOWSHOE/WINTER WALKING TRAIL GROOMING DAMAGE – Mr Sarrow represented that the golf course incurs no damage from the grooming of the Snowshoe/Winter Walking trail from the snowmobile and its sled. He mentioned that it's important to make sure that the snowmobile/sled packs the snow down adequately so as to insure no postholing from people walking on the trail.

John Wentworth spoke with Mr Sarrow on Wednesday August 2, 2006

Golf Course – Chateau Whistler Golf Course – Whistler, BC

Contact – Dan Nash

Title – Golf Course Superintendent

Telephone # - 1 604 938 4912

Winter Use

HORSE DRAWN SLEIGHS/MINI SNOWMOBILES/NORDIC SKIING/SNOWSHOEING + WINTER HIKING – The Chateau North Golf Course is used for a number of high impact activities in the winter, all of them extensively. The winter track – which is used for all users – travels over cart paths and is groomed and maintained nightly with heavy equipment. Course Superintendent Dan Nash uses a variety of tools to insure that his course doesn't get damaged. The first is to make sure that the track that will be used is well marked out in the fall. This is done with bamboo poles and other course marking devices, especially where the cart paths make turns or where the winter track will cross a fairway. The track travels over cart paths and through the surrounding woods, in some places not on the golf course directly. The winter track is groomed and compacted with a Piston Bully snowcat, he thinks it's a model 360. He likes the machine because although it is similar to what is used in a ski resort, it does have a lighter footprint. He emphasized that the Winter track is groomed and maintained nightly. Towards the end of the winter season when the snow depth gets shallower than 3 feet, Mr Nash switches over to a snowmobile pulling a metal sledge for grooming purposes. This system is effective and causes no damage to the course.

WINTER TRACK GROOMING DEPTH – Because of the weight and amount of traffic – from the horse drawn sleigh rides to the mini snowmobiles to the approx 8 – 10,000 nordic skiers that will be on his course over the 4 – 5 month winter season - Dan does no grooming of the winter track with the Piston Bully without a minimum snow depth of one meter or 3 feet.

WINTER TRACK GROOMING DAMAGE – Mr Nash says there is no operational damage to his golf course from winter activities. He emphasized that this is due in large measure to his department's experience over several years in learning how to stake out the course properly in the fall and not grooming the winter track until there is adequate snow depth. Damage that does occur to the course happens when either snow gets compacted down onto the grass and forms an ice layer or postholing gets in contact with the grass and causes damage. In either case, the damage is not permanent – the affected grass will typically take longer to recover in the spring, but eventually does recover fully.

GENERAL OBSERVATIONS – Mr Nash states that his course is exceptional for the weight capacity and amount of activity that takes place over his golf course during the winter months, and is happy with how well everything is working. He feels this is a product of several years of accrued experience and getting a system worked out that satisfies the needs of winter users as well as the health and integrity of the golf course. When asked about a possible strategy for backcountry skiers or snowboarders crossing a golf course during the winter months, he suggested that rather than staking out a course and sending the traffic over a specific path, it may make sense to spread the traffic out, to encourage a less concentrated traffic flow. He did mention that snowboarders or people simply hiking across the snow pose a particular threat from postholing, and in that case it would make sense to create a specific path which could be staked out in advance so as not to damage the course. He further suggested using a snowmobile with a towed sled to regularly compact the snow so as to keep an aerated snow layer next to the grass and not allow ice to form. Regular compaction would also prevent postholing by creating a solid snow surface separated from and above the grass. In either case, whether scattered or on a specific path, he represented that there was little or no risk to the golf course from backcountry

skier/snowboarder traffic, provided some forethought and planning in advance, and given the inherent negligible impact from this type of activity.

John Wentworth spoke with Dan Nash on Thursday, August 10, 2006

Golf Course – Park City Golf Club

Contact – Craig Sanchez

Title – Course Manager

Telephone # - 435 615 5833

Winter Use

NORDIC SKI TRAILS - The Nordic Trails are staked out in the fall and are designed to follow a very specific route over the golf course so as to minimize damage from grooming equipment. The Park City Golf Course uses a Piston Bully Bombardier – a full sized ski-area type snow cat towing a Pack a Track which grooms and lays out Nordic Ski Trails. Routing priorities were changed in recent years to ensure that the Nordic trails travel over cart paths and roughs and especially over roughs on the left side of fairways. Mr Sanchez identified three fairway crossings.

NORDIC TRAILS GROOMING DEPTH – No grooming with the Piston Bully Bombardier takes place unless a minimum snow depth of 12" is on the course in the areas to be groomed

NORDIC GROOMING DAMAGE – Mr Sanchez said that there was damage to the grass of the course due to the weight of the Piston Bully Bombardier and the packing down of the snow. Damaged areas of the course are reseeded in spring with typically no sustained damage to the course – evidence of damaged grass may be visible during the summer golfing season.

WINTER HIKING TRAILS – A winter hiking trail system is also used during the winter months. The winter hiking trails are staked out in the fall in a manner similar to the Nordic trails.

WINTER HIKING TRAILS GROOMING EQUIPMENT – The winter hiking trail system is groomed with a snowmobile pulling a roller or a Ginzu trail grooming device. Snow is packed down to adequately ensure ease of travel and more importantly to ensure that no post-holing occurs while people are using the trails. Mr Sanchez said that postholing can damage the underlying grass on the golf course.

WINTER HIKING TRAILS MINIMUM SNOW DEPTH – Mr Sanchez did not mention a separate depth for grooming the winter hiking trails. No Nordic grooming occurs until a minimum of 12" of snow is on the golf course.

WINTER HIKING TRAILS GROOMING DAMAGE – Mr Sanchez said that the golf course incurs no damage from the grooming of the Winter Walking trail from the snowmobile and its sled. He mentioned that it's important to make sure that the snowmobile/sled packs the snow down adequately so as to insure no postholing from people using the trail.

John Wentworth spoke with Mr Sanchez on Tuesday, August 1, 2006



**Yellowstone Track
Systems, Inc.**

Yellowstone Track Systems, Inc.

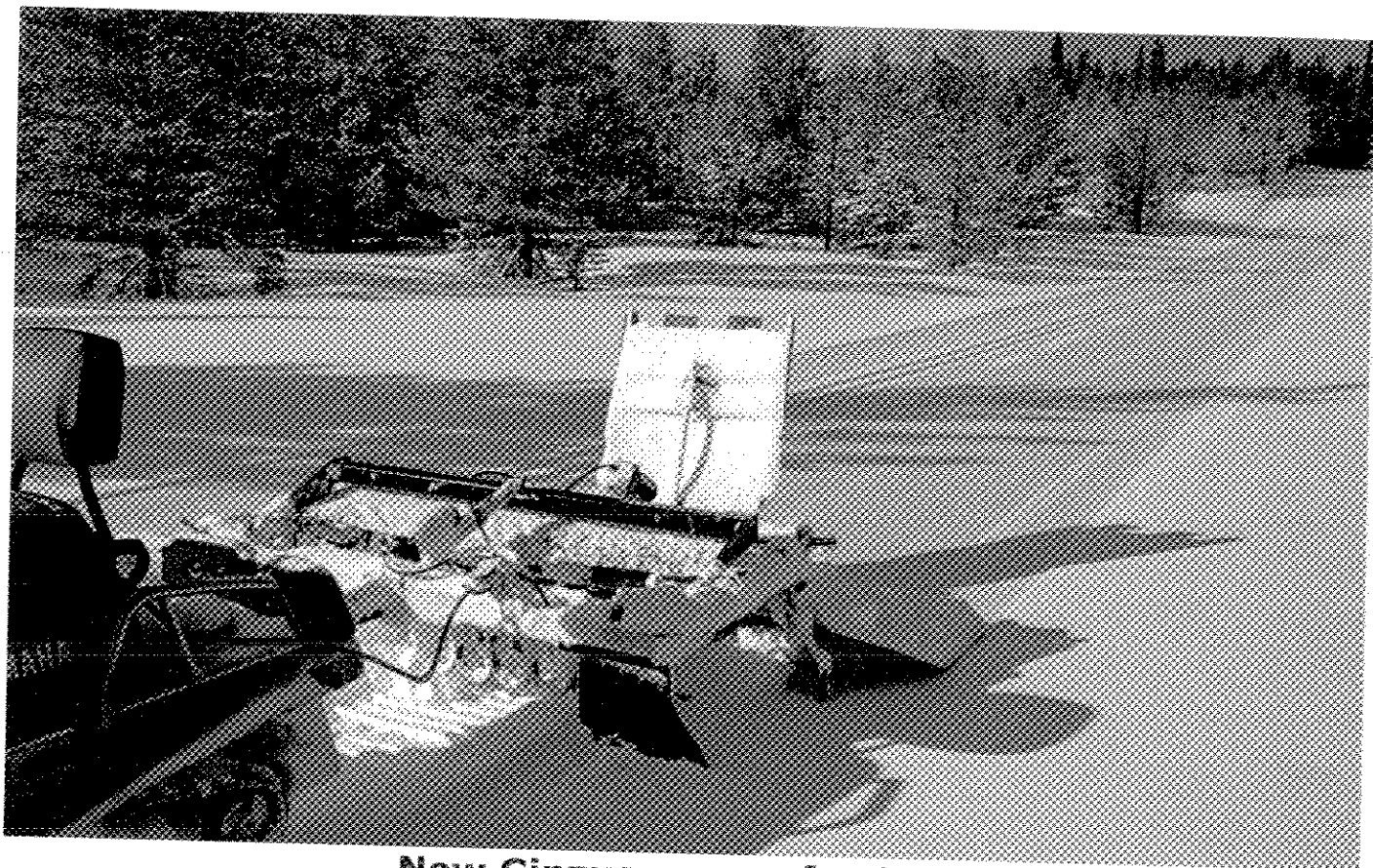
Cross Country Ski Grooming Equipment

Welcome to the Yellowstone Track Systems web site. Everything you need for grooming cross country ski trails can be found here on our site. Order now to ensure that you will have your grooming equipment when you need it this fall. We have now added the prices of wings and sweeps in the Ginzugroomer price. The 60", 84", and 108" aluminum frame Ginzugroomers are found on our Snowmobile Grooming Equipment page. Larger Ginzugroomer models are on the Snow Cat Grooming Equipment page, along with our Front Renovators and our Universal Tracksetters for Snow Cats. Please call us to specific questions for your area or to get a freight estimate.

There are copies of Ginzugroomers out there, yet none work like a Ginzugroomer. These other models are heavier, come as kits, and will not function like a Ginzugroomer. There is only one Ginzugroomer, and it is manufactured here in West Yellowstone, MT at Yellowstone Track Systems, your place for snowmobile groomers.

NEED SNOW COMB?

YTS sells snow comb direct made especially for the cross country ski market. Check out what is available on our Snow Comb page.



New Ginzugroomer for 2007

- Knife travel increased, both higher and deeper.
- Grooming equipment speed increased for greater efficiency.
- Excellent grooming equipment performance up to 23 km/hour.
- Lower pulling resistance.
- New rear comb profile.
- Much easier to pull in fresh snow.

Yellowstone Track Systems, Inc. has been in business since 1984. We feel we manufacture the best products for grooming cross country ski trails available today. We produce a full line of snowmobile and snowcat grooming equipment. Feel free to call us at 406-646-7603 or e-mail (skiyts@aol.com) us with any questions.

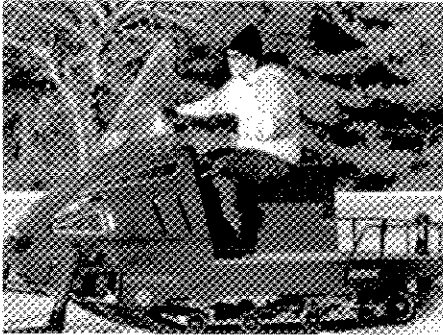
USE THE BEST...YTS!

Content ©2006 By Yellowstone Track Systems Inc.. All Rights Reserved.
Web Site created by Webanole .

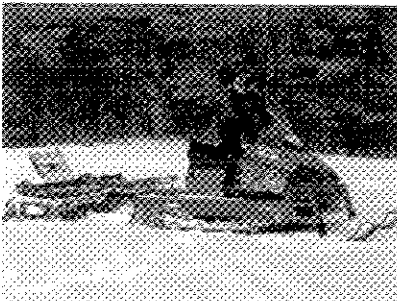
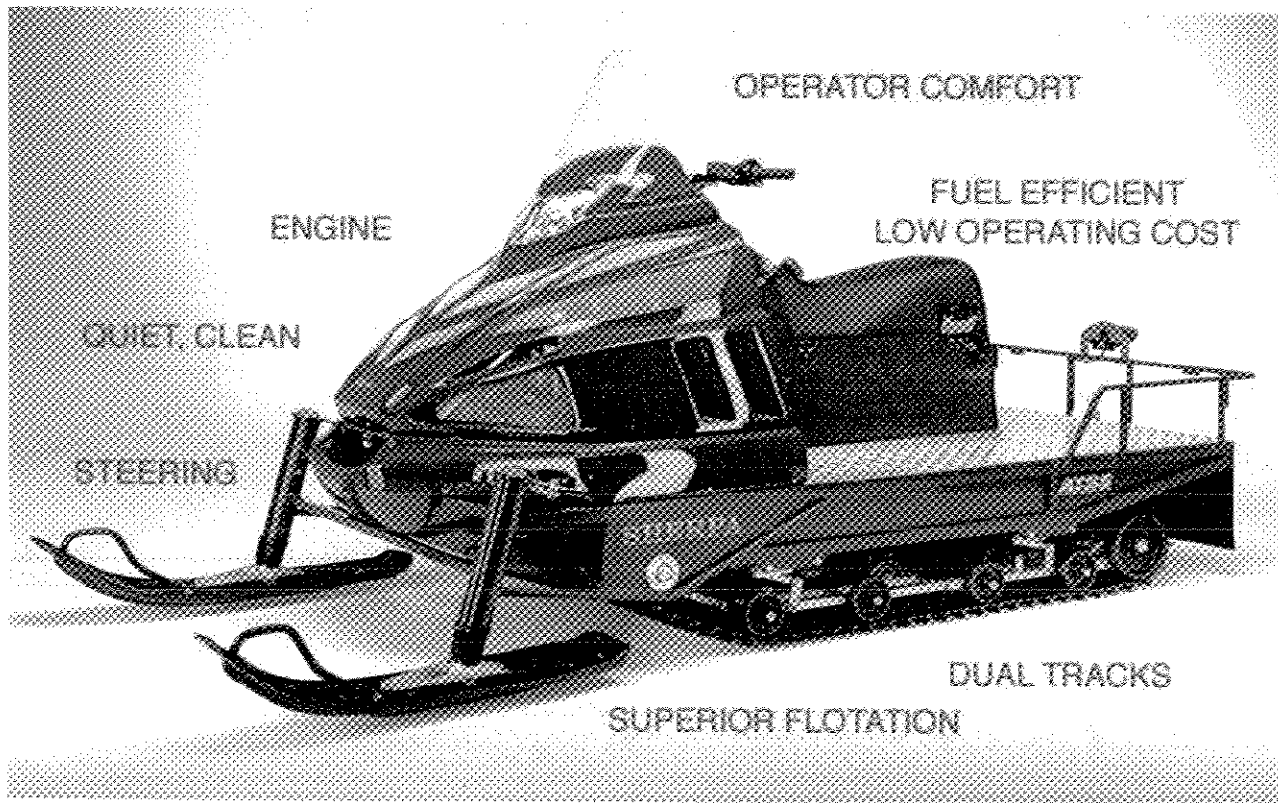
This web site is database driven and all content is inserted by Yellowstone Track Systems Inc..

TRAILGROOM.COM

YOUR SOURCE FOR :



- Alpina Sherpa Dual Track Snowmobiles
- Yellowstone Track Systems Ginzu Groomers
- **Alpina is the Italian-built dual-track Snowmobile for all your on snow jobs**
- **Yellowstone Track Systems Ginzu Groomers are simply the best grooming implements available to groom your Nordic trails**

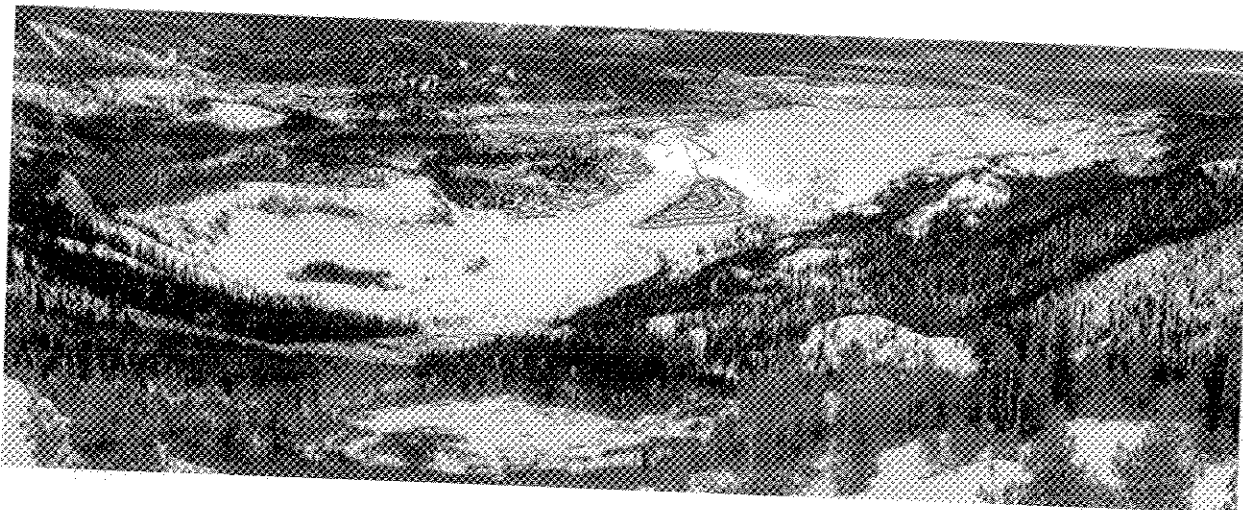


Available from:

HJRoberts Associates
1321 Bragg Hill Road
Norwich, Vermont 05055
802.649.1573

Exclusive Northeast dealer for:

Yellowstone Track Systems 108" Ginzugroomer
behind the Sherpa



Mammoth Lakes Trails and Public Access

Sherwins Working Group - Golf Course Winter Passage Resources

Introduction

Nicholas North Golf Course - Whistler

Vail Golf Club - Vail

Park City Golf Club - Park City

Chateau Whistler Golf Course - Whistler

Yellowstone Track Systems - Ginzugroomer

Alpina Sherpa Dual Track Snowmobiles

August 10, 2006



PO Box 100 PNB# 432
Mammoth Lakes, CA 93546
760 934 3154
mlipa.org

B27i

Summary Report

TRAILS AND GOLF COURSES: Best Practices on Design and Management



July 2005

alt

SUMMARY

Golf courses, with their large expanses of 'undeveloped' land, can appear to be a tempting place to locate a trail or bikeway in a community seeking to overcome gaps in their trail system. The golf course industry has been resistant to allowing increased public access for several reasons, including privacy, security, safety, liability, and impacts on golf operations. At the same time, trails and golf courses do co-exist around the country with few reported problems. The conclusion of this report is:

- In some locations, a trail or bikeway may be able to co-exist with a golf course as long as some basic design, operations, and management techniques are employed.
- Most of the existing courses that have allowed trails are publicly owned and publicly accessible courses.
- Additional research is needed to verify conditions in the case study sites, and to identify the conditions and practices that may be applicable to other locations.

TABLE OF CONTENTS

1. Introduction
2. Case Studies
 - a. Northern California Golf Courses
 - b. Portland, Oregon Area Golf Courses
3. Recommended Best Practices
 - a. Design
 - i. Choosing Trail Alignments
 - ii. Sharing Trails with Golf Carts
 - iii. Trail Intersection configurations
 - iv. Fencing Types
 1. High Curved Fences
 2. Vegetation
 3. Cage
 4. Netting
 - v. Signage
 - b. Security
 - i. Adjacent housing
 - ii. Hours of operation
 - iii. Course Rangers
 - iv. Liability
4. Areas of Needed Research

INTRODUCTION

The purpose of this document is to highlight innovative techniques used to successfully integrate trails with golf courses throughout North America using a combination of case studies and a checklist of best practices for design and security concerns in implementation. Much of this information and analysis is based on available resources, case study research, and limited interviews.

Golf courses are developed and designed for a specific user group and activity (golfers and golf) rather than as publicly accessible parks or open space areas in a community. Managers of private and public golf courses operate these facilities to make a profit, and are concerned not only with golfer's appreciation and enjoyment of the course, but also with the safety and security of golfers and adjacent land uses.

Golf course developers and operators plan, design, and operate their facilities assuming there will be no general public access. There typically are not corridors preserved for trails or bikeways, nor is their consideration given for allowing the general public to traverse the greens or tee areas. Any trail that is being considered for an area with an existing or proposed golf course should commit to working very closely with the course managers and designers before basic feasibility can be determined.

CASE STUDIES

NORTHERN CALIFORNIA GOLF COURSES WITH PUBLIC TRAILS

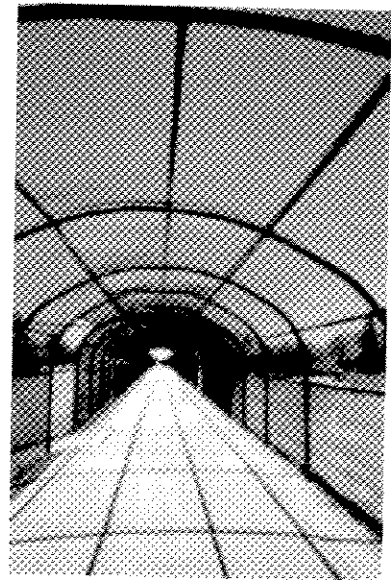
There are several golf courses in the San Francisco Bay Area with adjacent or internal public trails. Two golf courses, one in San Ramon and one in Half Moon Bay, have public multi-use trails running through them. In San Ramon, the regional multi-use Iron Horse Trail passes through the privately owned San Ramon Royal Vista Golf Course. In Half Moon Bay, the Ocean Colony resort and golf course has provided for public access on a multi-use trail that winds through the private course. The design and use of these trails differ significantly but both provide examples of potential best practices for multi-use trail design in a golf course context.

SAN RAMON ROYAL VISTA GOLF COURSE

Location:	9430 Fircrest Lane, San Ramon
Type of Trail:	Paved multi-use
Length of Trail	0.5 mile
Setbacks	20 yards
Age of Trail	4 years
Owner:	Waterhouse Properties, Inc.
Contact:	Russ Davies, 925-828-6100

Description:

- Internal alignment
- Privately owned and operated
- Existing right-of-way (Right-of-way predates golf course)



Public Access:

The San Ramon Royal Vista Golf Course is an 18-hole golf course that has a portion (about 0.5 miles) of the regional Iron Horse Trail passing through. The course was established in 1961 and the trail, originally railroad right-of-way was upgraded in 1999. The trail was upgraded to a 10' wide paved multi-use trail with 12' high chain link fencing to protect trail users from errant golf balls. The fence also forms a tunnel in two segments

where, along with the club pro, designers determined there would be the most significant danger of errant golf balls hitting trail users.

Design and Implementation:

While there is a trailhead for trail users with 40 parking spaces, this lot often fills up and trail users use the golf course clubhouse parking lot. Setbacks are generally about 20 yards throughout the course. Chain-link fencing is used on both sides of the trail for most of its length through the course to protect trail users from errant golf balls. At a few points, there is no fence between the golf course and the trail where it is assumed safe from errant golf balls.

Management Issues

No trail users have reported being hit by golf balls. There are signs warning trail users and golfers at the two crossings.

Evaluation

The trail is well protected and provides clear warning signage.

OCEAN COLONY GOLF COURSE

Location:	Two Miramontes Point Road, Half Moon Bay
Type of Trail:	Paved, multi-use
Length of Trail	0.5 miles
Setbacks	Variable
Age of Trail	6 years
Owner:	Ocean Colony, City of Half Moon Bay
Contact:	Rollie Wright, 650-726-8297

Description:

- Internal alignment
- Privately owned
- Privately operated
- Public easement

Public Access:

The Ocean Colony Golf Course features two 18-hole golf courses, known as the Old and New courses, along the pacific shoreline in the City of half Moon Bay. The resort and New course opened in 1997, and the public multi-use trail was part of mitigation measures required for the development. The two courses are connected by an on-street bike lane that runs from the resort to the Old course. The segment of trail that passes through the courses is part of the larger Coastal Bluff Top multi-use trail that runs along the shoreline and is maintained by the City of Half Moon Bay. As of this study, the trail segment passing through the golf course is not yet connected to the existing northern segment of the trail.

Design and Implementation:

There is a parking lot with about 45 spaces for beach access and trail users located where the existing northern end of the trail becomes equestrian-use-only (to be completed as paved multi-use trail segment and connected to Golf Course segment in near future) and fills up during peak beach hours. Setbacks are variable, but generally no more than 20 yards throughout the course. There is no fencing or signage in the New Course segment as the trail has yet to be fully implemented, though only the installation of signage is expected. In the Old Course segment chain-link fencing was installed at two locations in the course to protect trail users from errant golf balls. Along the majority of the trail, there is no fence between the golf course and the trail, as it is assumed safe from errant golf balls.

One significant design issue centers on the decision of where the trail enters the course. While the City of Half Moon Bay preferred running the trail from the existing northern section and continue it down along the shoreline, the resort and golf course management preferred the routing it away from the shoreline. The resulting entry point requires traversing a grade that is too steep to meet ADA requirements.

Management Issues

No trail users have reported being hit by golf balls. However, public trail-user volumes have been low due to the fact that the trail through the courses is not yet connected at the northern entry to the course and the existing Coastal Bluff Top Trail.

Evaluation

As of this writing, the trail is still not completed. One observation made that highlights some of the difficulties of allowing for public multi-use trails to run through private golf facilities was the decision of the trail alignment as discussed above, that ultimately would not meet ADA requirements.

PORTLAND (OR) AREA GOLF COURSES WITH PUBLIC TRAILS

In the Portland, Oregon metropolitan area, five golf courses have adjacent or internal public trails. Three of these courses are publicly owned, and two are privately owned. These trails vary from neighborhood-serving, soft-surface jogging trails, to regional, paved shared-use paths. Also, the setback between the trails and the golf courses vary greatly (from no setback to horizontal setback with fencing and vegetation). In general, the trails have not created significant problems for the golf course operators or the golfers who use the courses. Likewise, errant golf balls have not caused injury to any trail users in recent history¹.

According to local course operators, the primary concerns related to the interaction of trail users and golfers have been: occasional lack of courtesy on the part of trail users (not waiting for golfers to tee-off), un-leashed dogs on golf courses, and use of the golf course as a park (i.e. picnicking on the fairway).

The following pages contain profiles of two of the five Portland-area golf courses and their respective public trails: Glendoveer GC (with the most extensive trail) and Heron Lakes GC.

¹ As a note, any damage or injury caused by errant golf balls are the responsibility of the golfer. Therefore, golf course operators are not typically held liable for any damage caused by the golf balls.

GLENDOVEER GOLF COURSE

Location:	NE 140th and Glisan St., Portland
Type of Trail:	Fitness trail, wood chips
Length of Trail	2 miles
Setbacks	Variable
Age of Trail	25 years
Owner:	Metro
Contact:	Dale Vasnik, 503-665-6918

Description:

- Internal alignments
- Publicly owned
- Privately operated
- No easement
- No bikes allowed

Public Access:

Glendoveer is an 18-hole golf course that has a 2 mile jogging trail. The course was established in 1927 and the trail was officially built in 1979. The trail originally was an informal, neighborhood walking path and was graded and constructed as part of a CETA (Comprehensive Employment and Training Act) workforce training program. No easement was created. The trail is popular with local residents. This may speak to the fact that the surrounding neighborhood is park deficient. About 50,000 rounds of golf are played each year. Trail use is consistent, year round with more than 100,000 users per year.

Design and Implementation:

While there is a trailhead for trail users with 40 parking spaces, this lot often fills up and trail users use the golf course clubhouse parking lot. Setbacks vary throughout the course. At some locations, a vegetative barrier is used, at other locations, fencing with 1" spacing is used to protect trail users from errant golf balls. At a few locations, there is no barrier between the golf course and the trail.

Management Issues

No trail users have reported being hit by golf balls. There are signs warning trail users about the golf balls.

Evaluation

The trail is highly successful. The only recommendation for improvement was to expand the trailhead.

HERON LAKES GOLF COURSE

Location:	3500 N. Victory, Delta Park, Portland
Type of Trail:	Short trail section, part of 40-mile loop, wood chips
Length of Trail	200 yards
Setbacks	Berm (elevation) and 20 yds from fairway

Age of Trail	3 years
Owner:	City of Portland
Contact:	John Zoller, 503-823-5104

Description:

- Adjacent alignment
- Publicly owned
- Privately operated

Public Access:

Part of the larger 40-mile loop
 Used by non-golfers only
 No safety or warning signs (supposed to be)
 No signage or wayfinding
 Public access after hours

Design and Implementation:

No setback or fencing
 No intersections between trails and roadways

Management Issues

Liability: golfers are responsible for errant golf balls (industry standard). Homeowners' insurance covers this
 No accidents injuries in past few years. (2 in last 10 years all 4 Portland courses)
 No trail users have been hurt

Evaluation

Tenuous situation...Trail users enjoy. Golfers have no problems with trail. Biggest problem is that trail users sometimes turn their dogs loose, creating "new hazards."

Other

Two more trails are planned for the Golf Course. John Zoller assessed compatibility - buffer between golfers, their balls, and trail users. John was also asked to consult on the Fanno Trail adjacent to the Portland Golf Club.

OTHER CASE STUDIES

Numerous other trail and golf course locations existing around the country, including places like Palm Springs, CA, and Scottsdale, AZ. As information is collected on these locations, this report will be updated. Summaries of some of these other case studies are presented below, as collected by the Sacramento Area Bicycle Advocates (SABA).

Mountain Shadows Golf Course

Rohnert Park, CA

There are entrances and exits and many people use it to ride their bikes through the golf course.

Oakhurst Country Club

Clayton, CA

There are entrances and exits and many people use it to ride their bikes through the golf course.

Scottsdale, AZ

A number of trails along golf courses. One trail goes right across a course.



West Orange Trail

Orlando, FL

I have ridden by the golf course on the many times. While there is a chain link fence, its purpose is to keep the cyclists and other trail users from getting hit by errant golf balls. This appears to be a situation where there is absolutely no conflict at all. It does run right next to a golf course for quite a distance and at close enough proximity to the greens that trail users could presumably "disturb" the golfers. The West Orange gets about 40,000 users per month; probably 2,500 per day on a weekend. Most of those users would pass between 8:00 a.m. and 5:00 p.m., so that means 2 to 4 trail users would pass every minute. I've heard of no complaints from the golfers.

Bidwell Park

Chico, CA

We have one through the golf course in Bidwell Park. It's a road for most of its length and crosses a fairway, leading to a bike/ped/golf cart bridge over Big Chico Creek to a network of off road options. It gets a lot of use with minimal user conflicts.

Silverstrand

San Diego, CA

Coronado, the island/peninsula city west of downtown San Diego, has a bike path along part of the perimeter of a golf course. Much of the path had to have a very high chain link fence - to protect the bicyclists from golf balls. Interestingly enough the sidewalk along another section of the course does not have a fence.... poor pedestrians.

Pompano Beach, FL

I don't know if the photos attached will help. They are aerials that show the proximity of a multi-purpose path to the fairways on a public golf course. You'll notice that there is also an airport next to the golf course. You may want to have your city staff call the Pompano Beach Recreation Dept. at 954 786-7191. I have never heard of any problems between golfers and path users and I have been out to the path a couple times to help them correct some design problems.

Chicago, IL

We have lots of trails that go around golf courses, I don't know of any that go through.
No pictures

Tampa Bay Golf and Country Club

San Antonio, FL

Paved trail that winds around the golf course

The Ritz Carlton Hotel

Half Moon Bay on Hwy 1 CA

Popular multiuse path through their golf course. At one point a short stretch of fence was erected to protect bikes/peds from golf balls. The fence, on one side of the path only, consists of typical 8-foot chain link with a curved chain-link attachment projecting perhaps a foot or two over the path. The upper portion of the fence is covered with a nylon mesh to keep errant golf balls from penetrating the chain links.

Westerville, OH

Haggin Oaks Golf Course,

Sacramento, CA

Trail between golf course and Capital City Freeway (formerly called Business I-80). Trail receives little use. Fences on both sides.

American River Bike Trail

Campus Commons Golf Course

Sacramento, CA

Immensely popular trail runs immediately adjacent to 9-hole course. Very high fence (20 feet+) with chicken wire to protect cyclists. Trail runs very near a couple of tees and greens. No reported problems between cyclists and golfers in over 25 years of use.

Ancil Hoffman Golf Course

Sacramento, CA

Bike trail adjacent to driving range and golf course. Little trail use.

Community Pedestrian Trail

The Indian Peaks community provides a pedestrian trail that winds throughout the property and intersects with the golf course cart path system in several locations. Although pedestrians are not allowed access to the golf course, the pedestrian trail intersects the golf course to allow safe passage into other subdivisions of the community. Clearly marked pedestrian trail signs will guide you through these intersections. Please stay on the marked pedestrian trail at all times and enjoy this uniquely diversified trail system.

RECOMMENDED BEST PRACTICES

Based on past experience the following is a survey of most frequently used design practices and security measures utilized in combining golf courses with trail systems. Each practice is provided with a brief description of the practice and accompanying photo and figure drawing where available.

LAND OWNERSHIP

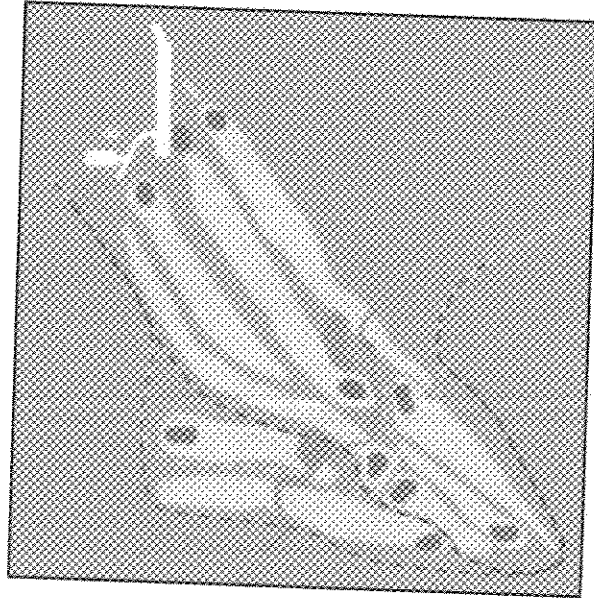
One of the basic golf course management obstacles to trail development is the land ownership itself. Golf courses are either privately owned, owned by a private community, or if publicly owned, managed by a private golf course operator. Any new public access in the form of a trail or bikeway would need to be secured by an easement or right-of-way on privately owned or controlled land. While a publicly owned course may consider the interests of the larger community and consider a new trail, private owners and operators will typically not consider new access to an existing course. They may consider a trail or bikeway if it is part of the development approval process, but typically not after the course is developed. The exception to this would be if the trail entity could meet the concerns of the property owner and offer adequate compensation and assurances.

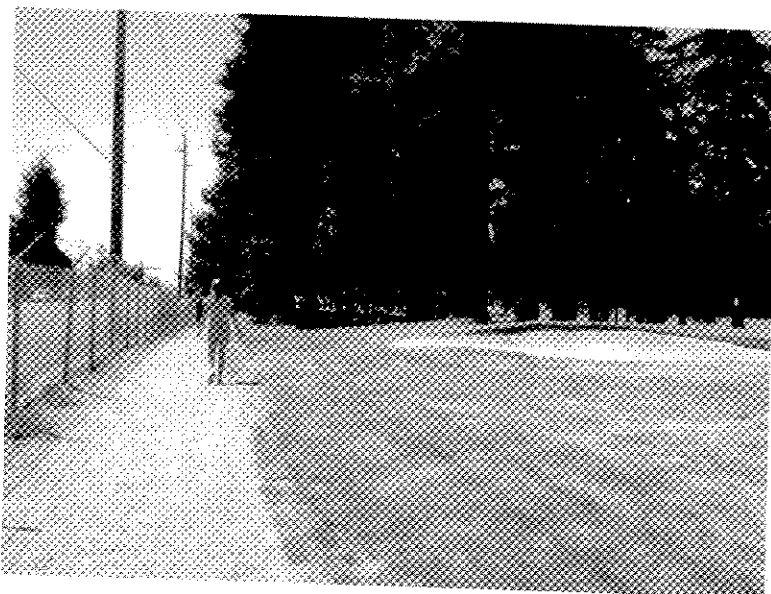
Trails through golf courses will almost always be located on a new easement, either leased or purchased by the trail entity. This easement agreement defines the responsibilities for liability, security, and maintenance. The easement will need to be surveyed and formally included in the title to the property.

DESIGN CONSIDERATIONS

Choosing Trail Alignments – In selecting trail alignments on golf course property, an understanding of both the property layout and golf course operations is needed. In most cases, it will be preferable to remain on the perimeter of a golf course, as far removed from fairways, tees, and clubhouse as possible. The best alignment would be one that crosses no cart path or fairway, and can be set back against the property line for its entire length.

This rule would remain even in cases where homes are located on the golf course. Trails have been developed in front of private golf course homes in Palm Springs with no apparent impact on property values. However, it is reasonable to expect that unless high fences protect golf course homes, adjacent trails may be strongly resisted.



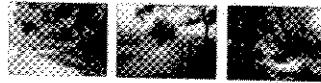


In many cases it may not be possible to remain on the perimeter of a golf course. Often, a perimeter trail will be too circuitous or steep to be functional. When considering any route that is close to a fairway or tee, or a route that bisects a golf course, it is important to consider direction of the tees, fairway, greens, and golf cart circulation. On tees, any trail located within a 180-degree arc of the tee orientation and within 200 yards or less in distance, will need to be buffered by berms, fencing and/or trees and shrubs. It is recommended that tees be oriented as far away from the trail as feasible. On fairways, any trail located within 50 feet of the fairway would also need to be buffered by berms, trees and/or shrubs, similar to a public roadway. Any trail located closer than 50 feet from the backside of a green would need similar protection.

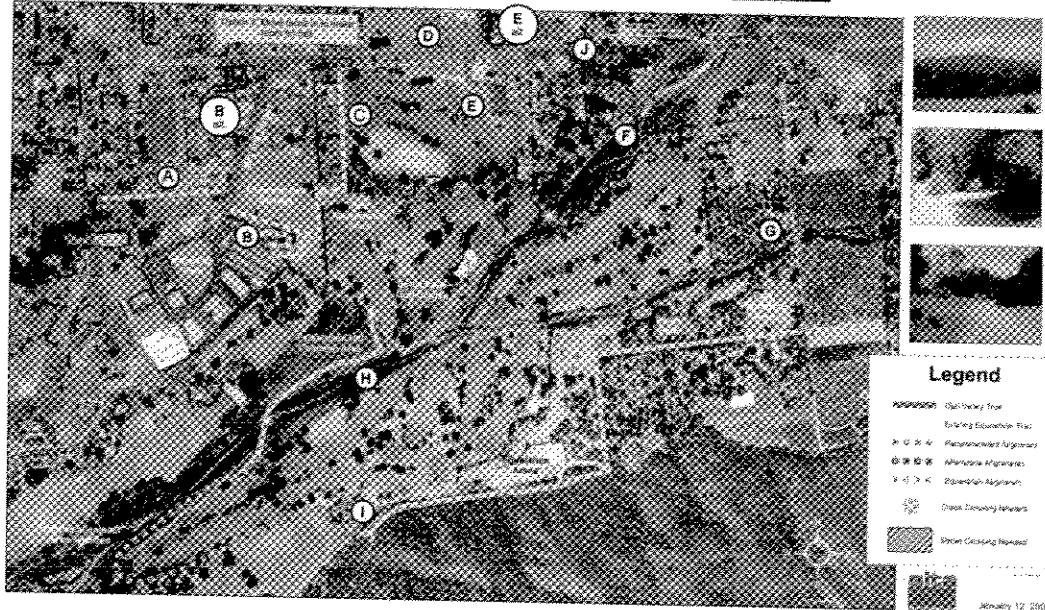
The Ojai Valley Trail Feasibility Study, conducted by Alta Planning + design in 2003, is a good example of a trail and golf course alignment and feasibility study. The objective of the project was to connect the Ojai Valley Trail, a paved multi-use trail between Ojai and Ventura, California (over 20 miles), to Soule County Park in Ojai. This connection would provide a natural termination point for the trail, along with ample trailhead facilities such as parking, restrooms, drinking fountains, and other amenities. The alignments had many of the typical issues facing other trails: right-of-way, concerns neighbors, stream crossings, mixed-use with equestrians, and of course, an active public golf course. As can be seen in the feasibility study map on the following page, numerous alternatives were considered including some alignments that did not come close to the golf course at all. The preferred alternative was the most direct and functional routes for users, and was located on the perimeter of the golf course so as not to impact operations. Objections from neighbors have slowed this project and it has not been completed as of 2005.

OJAI VALLEY TRAIL EXTENSION ALIGNMENT ALTERNATIVES

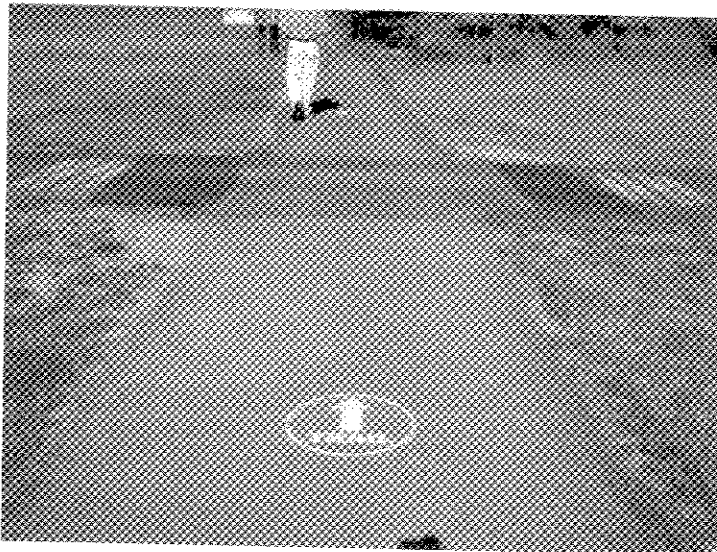
City of Ojai, California



Existing trails around the
Soule Park Golf Course and Park

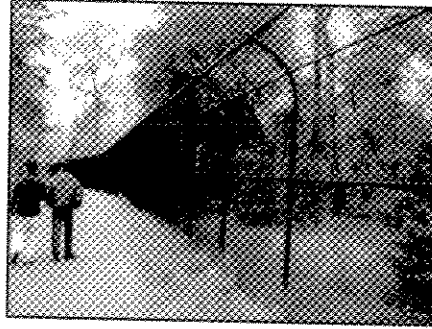
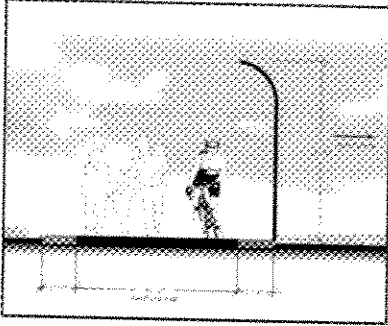


Golf Cart Paths - Trails that bisect a golf course but manage to meet the criteria described above will still need to address golf cart circulation. Golf carts and trails typically cannot be one and the same facility. Golf cart paths are not built wide enough to allow for carts to pass pedestrians and bicyclists, and neither user will be expecting the other on the narrow surface. In some cases, a wider pathway (at least 12 feet wide) with delineation can be shared between golf carts and trail users, separated by a striped line. In most cases, it is preferable to keep the facilities separate, even if they are parallel with each other. Where a trail crosses a golf cart, typical Yield and Stop sign controls will be needed, along with signs posted stating 'Golf Carts Only' where needed.



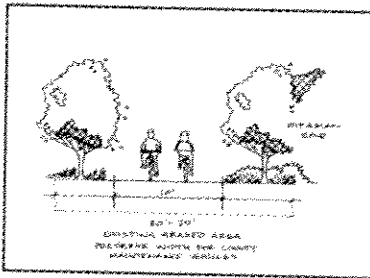
Fencing Types – At some point given proximity to active course areas, fencing will be necessary to protect trail users from errant golf balls. Below is a compilation of fencing types used in the case studies from the previous section.

High Curved Fences

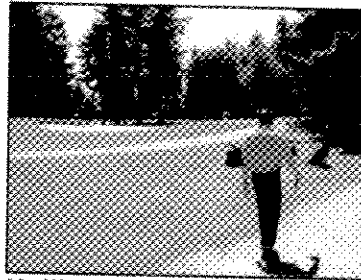


The high curved fences are typically a minimum of 12 feet in height and curved at the tops. The photograph above shows an example where the fence is painted black to blend with the landscape. Below, is an example of utilizing trees as a form of visual as well as protective screening for trail users. In many cases no fencing is needed due to golf course configuration and thorough understanding of possible golf ball trajectories.

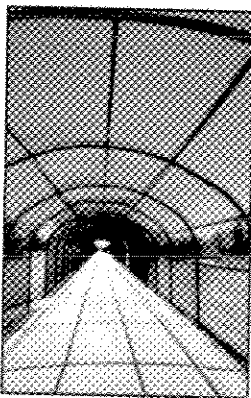
Vegetation



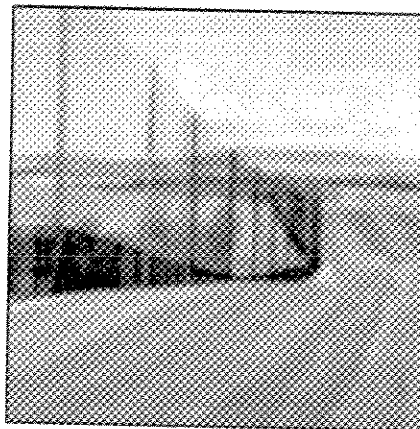
No Fence



Cage



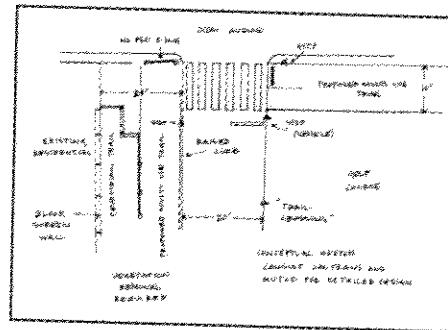
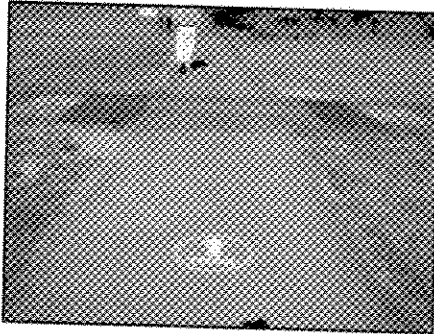
Netting



Above are examples of more extensive as well as costlier methods of protecting trail users. The cage fencing fully encloses trail users which would be appropriate for trail alignments that pass under driving ranges. Netting allows for intercepting higher flying golf balls and while the initial cost of materials is low compared to metal fencing, longterm maintenance and replacement should always be considered when choosing

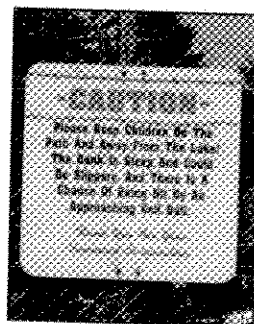
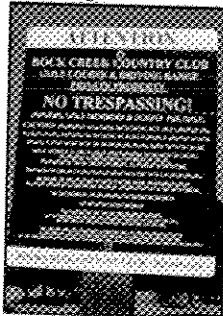
this material.

Trail Intersections



Trails with alignments that run through courses will potentially intersect with golf cart paths and interior roadways. Above are examples of treatments which have been successfully implemented in the case studies cited earlier.

Signage



In every case of integrating trails with golf courses, signage is necessary for delineating the point of entry to private golf course property. This is where recommendations to trail users of course hours of operation, to reminders on ways to ensure respectful conduct can be shared with trail users. Simple and legible signage with text printed against a contrasting background color is ideal.

Signage – Signs can help manage trail users in golf course areas. Some trails post a sign at the trail entry reading: "Active Golf Course. Stay on the trail surface, no stopping, and please be quiet. Flying golf balls may cross the trail: use at your own risk." Other trails are closed between dusk and dawn. Where a trail approaches a tee or green area, a sign may be posted that reads: "Please stop if the tee/green area is occupied".

SAFETY, SECURITY, AND LIABILITY

Limited information from existing case studies indicates that safety, security, and liability have not been major problems on existing trails. If properly designed and managed, a trail would have roughly the same safety conditions as a home or public road located next to a golf course—both common conditions. The following sections outline how a trail can maximize safety and security while minimizing liability.

TRAIL DESIGN

In order to maximum safety and function for users, and to minimize liability exposure for the project developer/operators, the trail design should meet all mandatory and advisory standards as identified by the local agency, State DOT, and other relevant agencies and documents. A Design Exception process should be completed with appropriate documentation on (a) the need any non-standard design, (b) any remedial

actions needed to address potential problems, and (c) an analysis on the potential for safety problems.

Maintenance Costs

1. Provide an adequate pavement structural section (3") to support maintenance vehicles
2. Minimize the extent of retaining walls and slope disruption
3. Provide adequate access to the path to prevent trespassing
4. Provide adequate fencing where needed

TRAIL MANAGER RESPONSIBILITIES

The designated Trail Manager for this project will be responsible for each of the activities involved in operating the golf course trail. The following sections address specific operating procedures and responsibilities.

Developing Trail Use Regulations

The purpose of trail regulations is to promote user safety and enhance the enjoyment of all users. It is imperative that before the trail is opened it must include posted use regulations at entry points and key access points. Establishing that the facility is a regulated traffic environment like other public rights-of-way is critical for compliance and often results in a facility requiring minimal enforcement. Appropriate civil statutes and penalties should be referenced on regulatory signs other than basic traffic control signage such as speed limit signs. The trail management agency will review proposed regulations with the local Attorney for consistency with existing ordinances and enforceability.

Below are samples of trail regulations to be adopted and enforced by the trail manager:

- Hours of use; 6am – 9pm.
- Motor vehicles, other than power assisted wheelchairs, are prohibited
- No loitering; no vandalism; no dumping (civil statutes)
- Keep to the right except when passing
- Yield to on-coming traffic when passing
- Bicycles always yield to pedestrians
- Give a vocal warning when passing
- Pets must always be on short leashes
- Travel no more than two abreast
- Alcoholic beverages are not permitted on the Bikeway (civil statute)
- 20 mph speed limit
- Bicycles to yield to maintenance vehicles

Trail Closures

The golf course trail may be closed from time to time during periodic maintenance of the facility or golf course. Trail users will need to be managed during these closures. The procedural policies that will be followed prior to the trail closing, including a variety of means to inform the public, are listed below:

- a. The Trail Manager will provide at least 48 hours advance notice to the appropriate department to post signs at all trail entrances on the impacted segments to be closed indicating the duration of the closure. Do everything possible to keep the public informed and make every effort to keep the closure period as short as possible. The 48-hour notice will be waived in the case of emergencies.
- b. The Manager will physically block the trail that is being closed with barriers and post "Trail Closed" signs.
- c. The Manager will provide "Detour" signs describing alternate routes.
- d. The Manager will not re-open the trail until it has been inspected by the Manager or other appropriate local agency staff to ensure that the trail is in usable condition. Where obstructions remain, provide warning signs for bicyclists to slow down or dismount where needed.

Trail Monitoring

In order to manage multiple user types with potential conflicts, the Manager will be prepared to address user conflicts as they arise, based on patterns of usage and recorded incidents. The Manager will also review complaints and accident reports on an on-going basis to determine if there is a pattern of user conflicts that needs to be enforced. Remedial actions may be in the form of signage and enforcement and may include:

- Lowered speed limits in some areas
- New or increased patrols
- Citizen volunteer education efforts
- Enforcement of overtaking and other requirements
- Changes in the hours of operation for specific user groups

Trail Maintenance Plan

Proper maintenance of the trail is of utmost importance for the productive use of the facility and the protection of the financial investment each community has made in the facility. The following list represents a minimum standard for trail maintenance to supplement existing local practices.

Table 2: Bikeway Maintenance Activities and Frequencies

Item	Estimated Frequency
Shoulder and grass mowing	As needed
Remove fallen trees	As needed
Trash disposal	As needed
Pothole filling	As needed
Bollard replacement	As needed
Irrigate/water plants	Weekly - monthly as needed
Graffiti removal	Immediately or within 24 hours of discovery
Pavement sweeping	Monthly - annually as needed
Weed control	Monthly - as needed
Tree, shrub, & grass trimming/fertilization	5 months- 1 year
Sign replacement/repair	As needed
Repaint Pavement markings	1-3 years
Fence/barrier repair and replacement	Immediate
Clean drainage system	As needed
Maintain irrigation lines/replace sprinklers	1 year
Lighting replacement/repair	As Needed
Maintain furniture	As needed
Maintain emergency telephones	As needed
Pavement sealing/repaving	Seal every 4 years / overlay every 20 years / pavement repairs as needed

Many of these maintenance items are dependent on the type and amount of landscaping and supporting infrastructure that is developed along the trail.

Adherence to the general maintenance schedule identified above is important. In addition, it is recommended that the trail be inspected once a year by the Manager to determine if the pathway surface has vertical or horizontal separation that might impact ADA access or user safety. Appropriate remedial actions need to be taken to address any condition deemed a safety hazard.

Security and Public Safety

If properly designed and managed, the golf course trail will offer provide a reasonable level of safety and security. Studies by the Rails-to-Trails Conservancy indicate that crime and other problems on bike paths generally is the same as the adjoining communities. These studies have also shown that the best and most effective method of enhancing safety and security is to design a functional facility that is well used by the general public. Bike paths in isolated locations exist around the country and have generally not experienced significant safety problems. The approach to safety and security outlined in this plan is to provide reasonable security features and be prepared to enhance those efforts in the future if safety and security prove to be problems.

Patrols and Enforcement: Like other trails, the golf course trail is expected to be generally self-enforcing by the general public. For the first three (3) months after opening, and on an intermittent basis afterwards, the Manager should patrol the trail with ranger trucks on a daily basis. The level of patrols should be based on reported incidents and problems. The cost of these patrols should be included in the operating costs for the project.

Emergency Response and Access

Emergency access for safety, security, or maintenance purposes will be based on an established protocol between local fire and police departments. Response protocol will be developed along with an Emergency Plan that will be developed by each department. The initial responding party will notify the other departments as soon as possible. Normally, the trail manager will take primary responsibility for all incidents on the trail itself, and will immediately contact SMART and local agencies as needed and appropriate. The trail itself is designed to allow emergency vehicles full access to the facility, although vehicles should proceed cautiously where there is restricted space.

TRESPASSING REDUCTION

In areas where there is a history of usage and trespassing across the golf course, a higher security type of fencing shall be installed. This may include hardened steel or wrought iron.

A summary of key security and safety measures is presented below.

1. The golf course will be posted "No Trespassing" to keep trail users out of restricted areas. Appropriate fencing that discourages scaling by potential trespassers will be provided as needed. No Trespassing signs will be posted with maximum fines supported by local ordinance.
2. The Trail Manager will provide local fire and police departments with a map of the system, along with access points and keys/combinations to gates/bollards.
3. The local agencies will enforce rules of the road and other standard recreational guidelines.

NEXT STEPS

Additional research is needed on this subject to enhance the quality of the case study research, and compile best practices for golf course and trail planners, designers, and managers. It is preferable that additional research be in conjunction with a golf course industry association, such as those listed below.

GOLF COURSE ORGANIZATIONS - WEBLINKS

<http://www.golfsuper.com/> Golf Course Superintendents of America

<http://www.golfclubmanagersassociation.com/>

<http://www.wsgagolf.org/> western states golf association

<http://www.ncga.org/> northern California golf association

<http://www.ncpga.com/> PGA of Northern California

<http://www.asgca.org/> American Society of Golf Course Architects -

<http://www.ngf.org/cgi/home.asp> National Golf Foundation -

http://www.mngolf.org/allied_mpgma.cfm Midwest Public Golf Course Managers Association

B28**Jen Daugherty**

From: Peter Maw [peter@century21mammoth.com]
Sent: Thursday, October 18, 2007 1:44 PM
To: Jen Daugherty
Subject: Snowcreek VIII

Hello Jen,

My name is Peter Maw and I work with Century 21 here in town. I was reviewing information on the plans for Snowcreek VIII...great plans but I see one major problem – the plans call for the removal / loss of the driving range. In my opinion, this is a major amenity in town. I can't see how anyone can rationalize removing the driving range. It just does not make sense. The town of Mammoth Lakes already has a vulnerable economy that is reliant on tourism so, again, I just don't see it making any sense. I grew up in Whistler and the driving range there is a large component of the local economy. No driving range equals less golfers, plain and simple. If I'm going to drive or fly to Mammoth for a summer golf trip, I would only do so if I have a chance to warm up and therefore play a "decent" round of golf. Many golfers will have a sour taste in their mouth regarding their golf experience if they are forced to go in "cold" or warm up by hitting golf balls into a net...

Anyway, I believe it would be a major mistake. I know the parcel of land is quite large that the development will take place on so it would be nice / necessary to see some adjustments made to keep this vital amenity.

Regards,

Pete

Peter Maw
Realtor-Associate
Century 21 Mammoth Realty
Tel: (760) 934-2121 Ext. 222
Cell: (760) 914-2052
E-Mail: peter@century21mammoth.com
Web Site: www.century21mammoth.com

VIEW MY VIRTUAL TOUR INVENTORY

IMPORTANT NOTICE: This e-mail, including any attachments, may contain privileged, confidential, and/or proprietary information, and is intended only to be seen and used by the named addressee(s). If you are not the intended recipient of this e-mail, you are notified that any discussion, distribution or copying of this e-mail, and any attachments, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately, and permanently delete the original and any copies of the e-mail, any attachments, and any printout without reading, distributing, or copying them. Thank you.

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.0/1077 - Release Date: 10/18/2007 9:54 AM

No virus found in this incoming message.

Checked by AVG Free Edition.

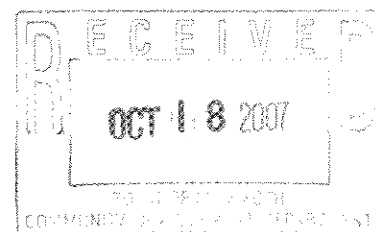
Version: 7.5.488 / Virus Database: 269.15.0/1077 - Release Date: 10/18/2007 9:54 AM

10/19/2007

B28-1

October 17, 2007

Jen Daugherty, Community Development Department
Town of Mammoth Lakes
Post Office Box 1609
Mammoth Lakes, CA 93546



Dear Ms. Daugherty,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Snowcreek VIII. It is essential that decision makers be well-informed on all aspects of a proposed project, particularly a large and long-term project like this one, which will have significant impacts on the community. As I reviewed the draft report, numerous questions arose about many of the assumptions made in the report. I also noted omissions and either a lack of or inadequate analysis of feasible mitigation measures that I am asking to be addressed in the Final EIR.

B29-1

GENERAL CONCERNS

1) Six of the eight impacts declared to be "significant and unavoidable" after mitigation list no mitigation measures or alternative options. "Significant and unavoidable" is a severe impact. Under CEQA each significant impact requires feasible mitigation measures. To flatly state: "No mitigation measures are available" is not adequate analysis.

B29-2

2) I find it both surprising and discouraging that well into the 21st century there is no analysis of the environmental impacts of conventional construction vs. sustainable and energy-efficient building practices and materials for Snowcreek VIII. Using conventional construction would alone make the proposed project inconsistent with the 2007 Town of Mammoth Lakes General Plan Resource Management and Conservation Element (Energy Resources (R.6), Green Technology (R.7), Energy Conservation (R.8), Solid Waste (R.9). Why no analysis of sustainable vs. traditional building practices?

B29-3

3) Another surprise: Impact AQ-4 Greenhouse Gas Emissions (p. 1-13 in the DEIR) concludes "No mitigation measures apply." Yet many of the policies adopted in the 2007 Town of Mammoth Lakes General Plan are the same as strategies suggested in the DEIR Technical Appendices (pp. 14-16, AEP "Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA Documents ... Approach 8.") Why weren't these strategies analyzed as possible mitigation measures with respect to the 2007 General Plan intents and policies on energy efficiency, site planning and sustainable building practices? Table IV C-14 notes Project will meet Title 24 (required) and recycle cardboard. Those are very modest goals for the next decade. Where is it shown as stated in the DEIR "...the Project complies[y] with all feasible and applicable measures to bring California to the emission reduction targets" (p. 1-13)?

B29-4

B29-5

4) It strains credibility that a project of the size and scope of Snowcreek VIII could have so many environmental impacts declared "Less than significant after mitigation" without proposing any mitigation measures.

B29-6

SPECIFIC CONCERNS

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

B29-7

AESTHETICS

p. 1-7 Impacts AES-1a and AES-1b

Text refers only to the proposed “Hotel element” as impacting scenic vistas. Why?

The entire project impacts scenic vistas and visual character.

Why is it also assumed “No mitigation measures are available”?

Certainly, the Snowcreek VIII project can be mitigated to frame scenic vistas and complement the site’s visual character through measures such as thoughtful site planning, carefully considered building footprints and heights, well-designed mass and form and non-intrusive finish materials and colors.

B29-7
(cont’d)

Case in point: the large Mueller home at the edge of the Bluffs above Snowcreek VIII is completely in the open yet, after skillful mitigation, it blends with its surroundings and does not intrude on the viewshed. There will be a visual impact with Snowcreek VIII’s future buildings vs. the current empty meadow but it does not naturally follow that “No mitigation measures are available.” An analysis of possible mitigation measures and alternative options for the project’s visual impact is needed.

p. 1-8 Impacts AES-2 and AES-4

Why is it assumed “No mitigation measures are available”?

For example, there are many pleasing details in the proposed buildings but the large number of separate buildings with accompanying paving uses up open space and interferes with vistas, both of the Project and from the Project. Having few types and thus many identical buildings can make for a uniform monotonous appearance, so evident in Snowcreek V. Lining up single family residences along the golf course is another negative visual impact. An analysis of clustering units into larger varied structures on different site plans is needed. Other than the fact the Project is not a single family subdivision scattered across the meadow, I don’t think the “Consistency Discussion” (C.2.M and C.2.N) accurately reflects the proposed site plan. Further analysis is needed.

B29-8

Snowcreek VIII can be mitigated to frame scenic vistas and complement the site’s visual character through measures such as thoughtful site planning, carefully considered building footprints and heights, well-designed mass and form and non-intrusive finish materials and colors.

p. 1-9 Impact AES-6 Light and Glare

This impact states new sources of “glare” are significant and unavoidable. The Town Outdoor Lighting Ordinance prohibits glare. At Snowcreek VI the attractive exterior lighting is shielded and down-directed; it does not cause glare. Rather than a blanket statement, an analysis of potential sources of glare and their mitigation, particularly from the proposed taller buildings, is needed.

B29-9

p. 1-10 Impacts AES-8 Cumulative Impacts

Why is it assumed “No mitigation measures are available”?

The entire Project can be mitigated to frame scenic vistas and complement the site’s visual character through measures such as thoughtful site planning, carefully considered building footprints and heights, well-designed mass and form and non-intrusive finish

B29-10

materials and colors. An analysis of possible mitigation measures and alternative options for the project's visual impact is needed.

B29-10
(cont'd)

AIR QUALITY

p. 1-10 Impact AQ-1 Construction Impacts

Why is it assumed that the impacts to air quality during construction are "significant and unavoidable"? This project is not short term--it will take ten years at minimum--and, yes, its impacts will be significant, but why "unavoidable"? Have all Best Management Practices (BMPs) available, including engine emissions, been considered for mitigation?

B29-11

p. 1-11 Impact AQ-1 Construction Impacts

The Snowcreek Meadow is one of the windiest locations in Mammoth Lakes. Current construction at Snowcreek VII has resulted, even with BMPs, in significant blowing dust from the stockpiled dirt. Therefore, I question if Snowcreek VIII's Mitigation Measure "g." as written with an "or" is adequate mitigation. The current stockpile is not covered and the dirt blows with every stiff breeze. Stockpiling aside, air quality over the ten-year construction period will be worst during grading, yet I could not find any analysis of air quality mitigation measures for grading impacts specifically other than suspending excavation during wind gusts of 50 MPH and sustained winds exceeding 25MPH. Only the impact on traffic circulation of increased vehicle miles traveled (VMT), by haulers is discussed. (p.1-66 Impact TRANS-10 Construction) Blowing dust during grading needs to be addressed with the grading "on dry soil" planned through year 2017 (p.IV.C-21)

B29-12

Another impact will be vehicle miles traveled (VMT), particularly at lunchtime, by construction workers, Why isn't a shuttle bus or other transit in lieu of personal trucks recommended to mitigate worker-generated VMT during ten-year construction period?

What will be the environmental impacts of demolition and construction debris? What percentage will be recycled? What standards will be used to evaluate this mitigation?

What will be the monitoring program for the Project's construction impacts mitigation?

p. 1-12 Impact AQ-1 Operational Emissions Mitigation Measure AQ-2a.

Where is the analysis of the transportation demand management program to determine if it will (and by how much) reduce impacts to air quality by reducing overall VMTs?

What standards will be used to evaluate this mitigation?

B29-13

p. 1-12 Impact AQ-2 Operational Emissions Mitigation Measure AQ-2b.

Regarding operational emissions, by providing connectors to **existing** transit and trails, the impact is declared "Less than significant," but where is the analysis of the additional connectors needed to open space, transit and bike trails **within** the project? Bicycle and pedestrian paths are referenced but not shown on any map. How will pathways within the Project connect with the Town Trail System, transit and open space? How will connecting to a network of mobility options outside the Project affect operational emissions? What standards will be used to evaluate this mitigation?

B29-14

p. 1-12 Impact AQ-2 Operational Emissions Mitigation Measure AQ-2e.

Where is the analysis of air quality impacts from solid fuel burning appliances in the project's single-family residences?

B29-15

p. 1-14	Impact AQ-5 Odors		
Why is it assumed that odors are “Less than significant” and cannot be mitigated? High quality Low-VOC (Volatile Organic Compounds) finishing products (paints, stains, glues, caulk etc.) are widely available and have far less impact on air quality and health. Where is the analysis of alternate material choices?			B29-16
p. 1-14	Impact AQ-5 Cumulative Impacts		
Paragraph 3 needs clarification. It does not make sense as written.			B29-17
BIOLOGICAL RESOURCES			
p. 1-19	Mitigation Measure BIO-1d		
A buffer of 25 feet around nesting sites is inadequate, according to the Audubon Society. An analysis is needed of how much the impact to nesting birds could be reduced if alternative nesting sites and materials were provided outside construction zones. What standards will be used to evaluate this mitigation?			B29-18
p. 1-20	Mitigation Measure BIO-1f (4 th bullet point)		
For accuracy, language should be added to this measure: “Consistent with the Town of Mammoth Lakes outdoor lighting ordinance, night lighting.....” or “In compliance with the Town of Mammoth Lakes outdoor lighting ordinance, night lighting.....”			B29-19
p. 1-23	Mitigation Measure BIO-2a		
Where is the analysis of the best time to plant and the irrigation required in order that revegetated areas will establish and thrive? What standards will be used to evaluate this mitigation?			B29-20
p. 1-23	Mitigation Measure BIO-2a (12 th bullet point)		
For accuracy, language should be added to this measure: “.....prepared by Mono County and adopted by the Town of Mammoth Lakes. ”			B29-21
HYDROLOGY & WATER QUALITY			
p. 1-41	Impact HYD-3	Drainage Pattern Alteration	
Drainage channels in spring, whether existing, re-directed, year-round or ephemeral have a significant impact on the community of Mammoth Lakes. Rather than just saying “No mitigation measures are required,” why aren’t the BMPs used during the ten-year construction project listed under Mitigation Measures?			B29-22
LAND USE AND PLANNING			
p. 1-43	Impact LU-1	Consistency with Applicable Land Use Plans, Policies or Regulations	
On what assumptions is this statement based? “Due to consistency with virtually all of the 1987 and 2007 General Plan policies, impacts of the Project would be less than significant and would not require mitigation.”			B29-23
p. 1-44	Impact LU-2	Cumulative Impacts	
Clarification is needed for the statement: “Project.....would not be great enough in size or extent to divide an established community.” As currently proposed, the Project is			B29-24

surrounded by a golf course moat. How is that consistent with the above statement?

B29-24
(cont'd)

NOISE

p. 1-46 Impact NOISE-3 Temporary Increase in Noise (Construction Noise)
Why are no mitigation measures listed for construction noise? How does only being noisy during the period from 7 AM to 8 PM mitigate irritating noise? What does this statement mean: "...construction activities...would not occur...on days that residents are most sensitive to exterior noise...?"

B29-25

POPULATION AND HOUSING

p. 1-50 Impact POP-1 Population Growth Associated with Employment
What are the assumptions underlying "Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project."?
This is a minimum ten-year project. What will be environmental impacts from influx of construction workers and their families? How would impacts mitigation be measured?

B29-26

PUBLIC SERVICES

p. 1-52 Impact PS-2 Police Services (Cumulative)
The assumption that "...the Project would not result in a meaningful increase in crime..." is inconsistent with my personal experience as a 15-year resident of Mammoth and with M.L. Police Chief Schienle's comments included in the DEIR. This issue needs further analysis with hard data that demonstrates the proposed mitigation measures are adequate.

B29-27

p. 1-53 Impact PS-3 Fire Services
The impact of this project on emergency evacuation (forest fire, eruption, etc.) could be substantial. Presently there is only one exit route from all of Old Mammoth: Old Mammoth Road. An analysis of the Project's impact on emergency evacuation should be done. An alternate escape route should be analyzed and mitigation measures proposed.

B29-28

p. 1-56 Impact PS-8 Parks and Recreation Services (Cumulative)
How was it determined, and who made the determination, that "the Project's impacts to park services would be less than significant"? How is this measured?

B29-29

RECREATION

p. 1-58 Impact REC-1
What assumptions underlie the statement: "The development of the Outfitter's Cabin as a focal point for entry into the Inyo National Forest would...serve to reduce impacts observed at other access routes in current use..." What "impacts...at other access routes"? What is the bicycle, pedestrian, Nordic skiing trail plan for this project? How does the Town Trail System network connect with the Snowcreek Trail system? How do residents within Snowcreek VIII connect with the Town Trail System?

B29-30

p. 1-59 Impact REC-3
It is stated that access to the Sherwin Range and Inyo National Forest will be "permitted and lawful" from a trail on the eastern edge of the Project site. Do we assume that access on bike and pedestrian paths within and through the site is "unlawful"? What are the environmental impacts of funneling access to one point next to an "Outfitter's Cabin"?

B29-31

TRANSPORTATION/TRAFFIC

p. 1-63 Impact TRANS-5 Bicycle and Pedestrian Facilities

What do “bicycle and pedestrian facilities” include? Rest rooms, bike racks, maps, interpretive signage, other? How pedestrian and bicycle paths connect to the rest of the community is referenced on p. III-34 but no map is included. It is not clear from DEIR discussion that internal walking and bicycle paths are open to the public. Are they? (C.3.C p. IV.H-48 states “no roads will be closed.”) Nordic skiing access is an alternative form of transportation and recreation promoted by the Town on its Trail system. The DEIR acknowledges this on p.1-63 but discusses only bicycle and pedestrian paths within Snowcreek VIII. Why is Nordic skiing not included?

Where are the transit stops/shelters for Snowcreek VIII located? (referenced on p. III-40)

Because of its size, Snowcreek VIII is more than a development; it is a neighborhood. It is part of the Mammoth Lakes community. Public access to and connectivity with all neighborhoods is important for a healthy community.

B29-32

UTILITIES & SERVICE SYSTEMS

p.1-67 Impact UTIL-1 Wastewater Generation

Where is an analysis of using gray water (from showers, clothes washers, sinks, etc.) to water the golf course in summer and to melt snow under the driveways in winter?

B29-33

p. 1-69 Impact UTIL-5 Water Supply

Why is there no analysis comparing water use for drip irrigation vs. traditional sprinklers for maintaining landscaping trees, shrubs and flowers? Lawn area is described as “minimal” (p. III-42.) How much turf will be included? How much water will it use?

Why no analysis contrasting a xeriscape golf course vs. a traditional irrigated turf course?

B29-34

p. 1-69 Impact UTIL-6 Water Infrastructure

Where is the analysis of geothermal heating alternative (logically to be installed when the water and wastewater systems are) for the Project? Will the Project be geothermal-ready?

B29-35

PROJECT CHARACTERISTICS

p. III-20 Natural Resources and Historic Interpretive Center

Mammoth’s signature viewshed is seen from the northwest corner of Minaret and Old Mammoth Roads: Mammoth Mountain with Snowcreek Meadow in the foreground.

Installing a parking lot and building on that corner would have a very significant visual impact and one that is unnecessary. Even though it is called a “disturbed site” (p.IV.H-9) the replanted spruce trees have now established and the ground has revegetated well.

An analysis is needed of an alternative option: a trail with interpretive signage starting at the intersection, connecting with the Sherwins’ planned trail along Mammoth Creek to the east and an additional connector with the Snowcreek Meadow trail to the west. The trail should branch to the proposed General Store. A parking lot desecrates this viewshed and actually interferes with interpreting the natural surroundings. A parking lot also is not consistent with the community’s vision of feet first, transit second and cars last.

B29-36

p.III-20 Market/General Store – Retail Component

Recycling (with remodeling) the current rental office makes sense for the General Store, a multi-use facility. There is no mention of public rest rooms provided in the General Store. They will be needed and should be accessed from the outside. In lieu of building a separate structure for an “Interpretive Center,” interpretive historical photographs could be mounted on the building’s exterior walls and maps and information provided in racks. This alternative should be discussed.

B29-37

An analysis of potential uses for and restoration of the historic log cabin across the drive from the rental office should be included. An analysis of other parking configurations for the disturbed area around the log cabin and current rental office should be done rather than only a single option: paving over the foreground of Mammoth’s signature viewshed.

p. III-33 Outfitters’ Cabin

The practicality and usefulness of this structure is not clear. Retail needs and information can be provided at the General Store. There is no analysis of the building’s environmental impacts vs. those of a rental equipment van driven to the site on sunny days. Portable self-contained toilets, as used on the golf course, would have less environmental impact.

B29-38

Figure III-4 Pedestrian and Bicycle Circulation System

Not indicated in Figure III-4 are the pedestrian and bicycle pathways as well as how they connect to transit stops and the Town Trail System. The legend doesn’t mention paths.

B29-39

p. IV.H-62 Energy Resources

The “Consistency Discussion” for R.6.A, R.6.C, and R.7.A is woefully inadequate. It barely begins to address the intents and policies of the 2007 General Plan. Site orientation, passive solar heating, other alternative heating sources, daylighting, increased insulation, double door entries to buildings and single family residences, reduced lighting that is energy-efficient, planning kitchen/laundry/bath utility cores within units to reduce distance hot water has to travel or else using on-demand water heating, using waste heat for driveway snowmelt, using sustainable building practices and materials, etc., etc. A much more thorough analysis is required here.

B29-40

p. VI-1 Alternatives to the Proposed Project

There is no analysis of alternate site plans for each of the Alternatives A, B and D. That would be useful information. An analysis with a different site plan that clusters units into larger varied structures at the proposed Project’s density is also needed.

B29-41

Appendices Scoping Comments

Why is a driving range being eliminated? It is popular recreation and a natural amenity for a golf course. Many of the people commenting during scoping expressed surprise and anger that a driving range would be eliminated. An analysis of driving range location options with their environmental impacts is needed

B29-42

Yours truly,
Elizabeth Tenney
Post Office Box 2428
Mammoth Lakes, CA 93546-2428

Jen Daugherty

From: harmony webster [shaboosheba@yahoo.com]
Sent: Friday, October 19, 2007 8:24 AM
To: Jen Daugherty
Subject: from John Wilson/Snowcreek DEIR comment

Dear Council Members and Planning Commissioners, I have read Snowcreek VIII Comments put forth by the Advocates For Mammoth and I concur fully with them. Please give them careful consideration.
Thank You,
John Wilson

B30-1

Do You Yahoo!?

Tired of spam? Yahoo! Mail has the best spam protection around <http://mail.yahoo.com>

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.1/1079 - Release Date: 10/19/2007 5:10 AM

B31**Jen Daugherty**

From: John Smyth [JSmyth@lgc.com]
Sent: Sunday, October 21, 2007 8:38 PM
To: Jen Daugherty
Cc: Base Camp Cafe; Wendy Sugimura; CRAIG SCHRAGER; Michele Hansen; pauloster@earthlink.net; Mary Ann Dunigan
Subject: Snowcreek Phase VIII plan comments
Importance: High
Attachments: Observations, Conclusions and Recommendations - SC Phase VIII Development Planning - John Smyth v1.0.ppt

Jen,

My apologies for the delay in sending my comments regarding the CEQA Draft EIR document (Q3 and Q4 are our busiest quarters of the year). Respectfully, I have also presented my observations/conclusions/recommendations regarding the overall planning/CEQA process.

Please find enclosed at 10 slide ppt presentation representing my observations, conclusions and recommendations.

Thanks.

John Smyth

Landmark Project Management

"From Planning through Execution"

Consulting

Well Construction

Production Optimization

Asset Management

Paseo de la Reforma 389, Piso 11

Colonia Cuauhtemoc

México D.F. 06500

Oficina: 52-555-208-3533

Cellular: 52-1-555-406-2970

Houston IP Phone: 713-839-4284

e-mail: jsmyth@lgc.com

This e-mail, including any attached files, may contain confidential and privileged information for the sole use of the intended recipient. Any review, use, distribution, or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive information for the intended recipient), please contact the sender by reply e-mail and delete all copies of this message.

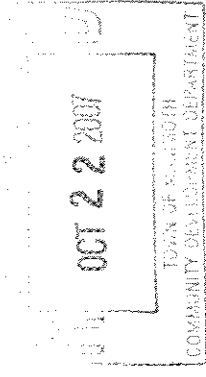
No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.5/1085 - Release Date: 10/22/2007 10:35 AM

10/22/2007

B31-1



Observations, Conclusions and Recommendations

John Smyth
October 19, 2007

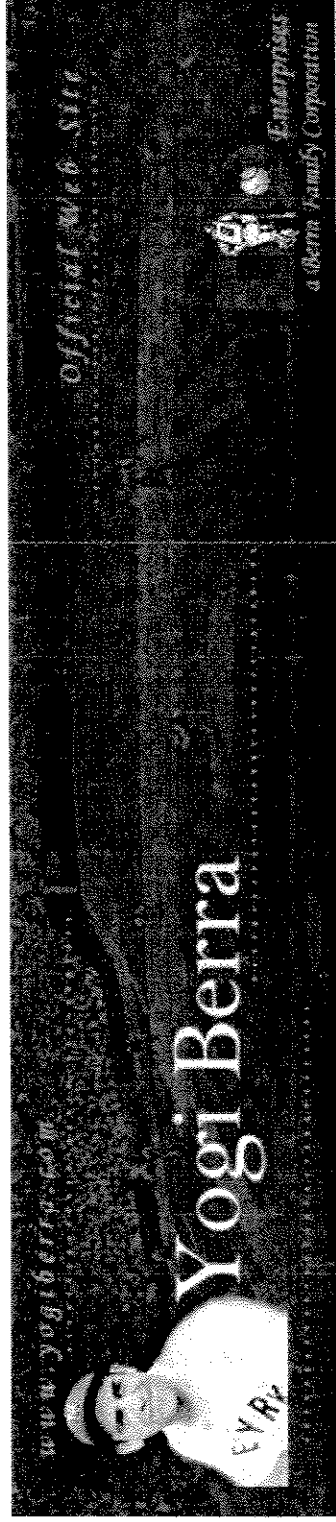
SC Phase VIII Development Planning

Mammoth!

Who are we? Where are we going?

“If you don’t know where you’re going, you’ll never get there”

Yogi Berra, et. al.



So — where are we going?

GP 2007

COMMUNITY VISION

Surrounded by uniquely spectacular scenery and diverse **four-season recreation opportunities**, the community of Mammoth Lakes is committed to providing the very **highest quality of life for its residents** and the highest quality of experience for its visitors. To achieve this vision, Mammoth Lakes places a high value on:

- X** 1. ***Sustainability and continuity of our unique relationship with the natural environment.*** As stewards, we support visitation and tourism as appropriate means to educate and share our abundant resources and are committed to the efficient use of energy and continuing development of renewable resources.
- X** 2. ***Being a great place to live and work. Our strong, diverse yet cohesive, small-town community supports families and individuals by providing a stable economy, high quality educational facilities and programs, a broad range of community services and a participatory Town government.***
3. Adequate and appropriate housing that residents and workers can afford.
- X** 4. Being a world-renowned year-round resort community based on ***diverse outdoor recreation***, multi-day events and an ***ambiance that attracts visitors***.
- X** 5. ***Protecting the surrounding natural environment and supporting our small-town atmosphere*** by limiting the urbanized area.
- X** 6. ***Exceptional standards for design and development that complement and are appropriate to the Eastern Sierra Nevada mountain setting; our sense of a “village in the trees;” and small-town charm and unity.***
7. Offering a variety of transportation options that emphasize connectivity, convenience, and alternatives to personal vehicle use with a strong pedestrian emphasis

Town Staff Alignment to General Plan

TOWN GOVERNMENT

An **open, participatory and inclusive** Town government is critical for accomplishing the goals, policies and actions outlined in this General Plan. The goals and policies for the Town Government Element will make Town government decisions predictable, fair and cost-effective.

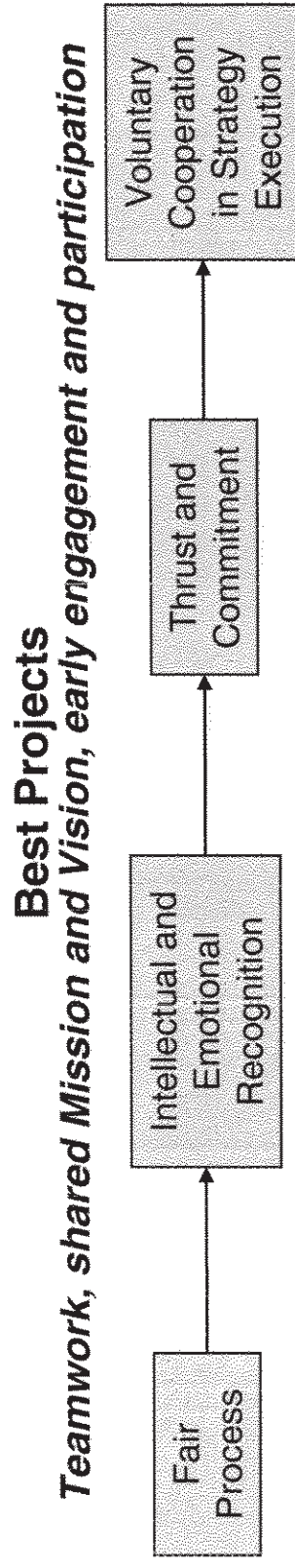
1. Goal: **Encourage community participation** by ensuring Town government and staff are responsive and accessible.

A. Policy: **Involve all members of the community in the public decision-making process** through concerted outreach efforts targeting the diversity of the community.

B. Policy: Maintain and **provide opportunities for a high level of public involvement in community decision-making.**

Fair Process

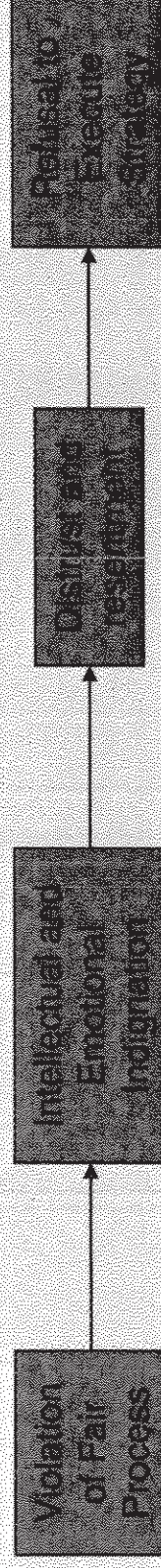
The Execution Consequences of the Presence and Absence of Fair Process in Strategy Making



Snowcreek Phase VIII?

Poor Projects

Lack of Teamwork, Mission and Vision not communicated or disregarded, late or no engagement and participation of stakeholders



How is SC VIII Aligned to the Vision?

Table VI-1
Alternatives Project Components Comparison

Land Use	PROPOSED PROJECT	ALTERNATIVE A (No Project)	ALTERNATIVE B (Revised Site Plan)	ALTERNATIVE C (Reduced Density)	ALTERNATIVE D (Increased Density)
NON-RESIDENTIAL					
Non-residential Space	75,000 SF	120,000 SF	120,000	0	75,000 SF
RECREATIONAL/AMENITIES					
Resident's Club/pool area	•	•	•		•
Interpretative Center	•	•	•		•
Store	•	•	•		•
Outfitters' Cabin	•	•	•		•
Golf Course	18-Holes	18-Holes	18-Holes	9-Holes	18-Holes
Driving Range				Relocated	
RESIDENTIAL					
Avg. Residential Unit Size	1,775 SF	1,928 SF ⁽¹⁾	1,775 SF	2,169 SF	1,775 SF
HEIGHT					
Residential Height Limit	45'	45'	45'	35'	60'
Hotel Height Limit	120'	45'	120'	NA	120'
DWELLING UNIT/DENSITY					
Total Buildings	73	39	80	153	49
Residential Condo	850	636	850	530	986
Hotel/Condo ⁽²⁾	400	300	400	0	400
Motor Inn ⁽³⁾	0	150	0	0	0
Total Units	1,050	863	1,050	530	1,186
DENSITY					
Calculated over 66.27 acres	1,050/66.27	863/66.27	1,050/66.27	530/66.27	1,186/66.27
Total New Development Site Density	16 units/acre	13 units/acre	16 units/acre	8 units/acre	18 units/acre
Calculated over 144.15 acres	1,050/144.15	863/144.15	1,050/144.15	530/144.15	1,186/144.15
Total Project Site Density	7 units/acre	6 units/acre	7 units/acre	4 units/acre	8 units/acre
Calculated over 345 acres (all Master Plan units)	2,195/345	2,008/345	2,195/345	1,675/345	2,331/345
Total Master Plan Density	6.36 units/acre	5.8 units/acre	6.4 units/acre	4.9 units/acre	6.8 units/acre
Development North of Old Mammoth Road	Yes	No	No	No	Yes

SF = square feet

Notes:

(1) These are estimated square footages based on Snowcreek III and Snowcreek V square footages for 2-4 bedroom units.

(2) Hotel/Condo Units include the Private Residence Club (PRC)/suite units.

(3) Unit Counts were determined by using 1/2 density counts for hotel and motor inn units.

OK - CEQA guidelines rating

But which Alternative Achieves the goals specified by the residents, second home owners, Advocates and Stakeholders in the General Plan and established zoning?

Table VI-2

IMPACT AREA	PROPOSED PROJECT	Alternatives Impacts Comparison			
		ALTERNATIVE A (No Project)	ALTERNATIVE B (Revised Site Plan)	ALTERNATIVE C (Reduced Density)	ALTERNATIVE D (Increased Density)
Aesthetics	S	—	—	—	+
Air Quality	S	+	+	—	+
Biological Resources	LTS/M	—	—	—	=
Cultural Resources	LTS/M	—	—	—	=
Geology & Soils	LTS/M	—	—	—	=
Hydrology & Water Quality	LTS/M	—	—	—	=
Land Use and Planning	LTS	—	=	—	+
Noise	LTS/M	+	+	—	+
Population & Housing	LTS	=	=	=	=
Public Services	LTS/M	—	+	—	+
Recreation	LTS	—	=	—	+
Transportation & Circulation	LTS/M	+	+	—	+
Utilities & Service Systems	S	—	+	—	+

Key:
 S = Significant Impact
 LTS = Less-than-Significant Impact
 LTS/M = Less-than-Significant Impact with Mitigation
 + = Impact greater than the Project
 = = Impact similar to the Project
 — = Impact less than the Project

Additionally, why would you run scenarios which clearly can't even meet the standards of the CEQA not met by the base case?

None

And we have lost over 1 year in this process with no alignment of participants

Project Objectives

As defined by whom?

B31-7

Bullet points 6 & 18 (18 objectives??)

- Create a landmark hotel property providing an **icon** for Mammoth similar to the Banff Springs Hotel in Alberta, Canada or the Ritz Carlton, Bachelor Gulch Hotel in Beaver Creek, Colorado for the Town by providing a luxury destination rustic resort hotel and neighborhood offering the characteristics of the best North American and European ski resorts.
- Create architectural expressions complementing the Sherwin rustic mountain setting and the **icon** resort hotel buildings by emphasizing roof lines, building massing, and fitting the varying topographic conditions for the residential units.

Mammoth is about building “**icons**”? Better re-write the General Plan or

“stick to the plan”

- Continuity of our unique relationship with the natural environment
- Village-in-the-trees (120’ hotel with no trees around it? Hmmm)
- Ambiance that attracts visitors (believe it or not, most folks actually do come to see the mountains)
 - By-the-way, I go to Calgary on a regular basis on business and I don’t know of a single calgarian who goes to Banff for the hotel.

B31-8

Conclusions

- The EIR appears to have been prepared by a select group with no participation of town residents nor their primary representative groups (namely, the Advocates of Mammoth, Stakeholders)

B31-9

- The town staff appear to be disregarding the stated Vision and Mission as defined in the General Plan with the presentation of these plan alternatives

B31-10

- Due diligence is not being performed in the development of plans for major projects (including SC Phase VIII)

B31-11

Recommendations

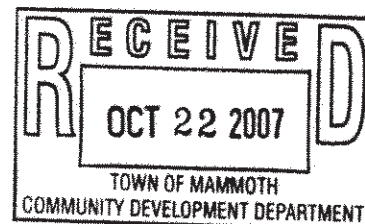
K.I.S.S.

- **Step 1:** Engage the residents/second home owners of the town early and often in ALL MAJOR PROJECT planning efforts
 - Believe it or not, there are some really smart folks that live here in Mammoth who can, and are willing to, help
- **Step 2:** Stick-to-the-plan: this is why the town has a General Plan and Zoning – USE THEM!!!
- **Step 3:** With respect to the SC Phase VIII plan – SCRAP WHAT YOU HAVE and follow steps 1 and 2 and THEN go to the CEQA
- **OTHER:** Start looking at sustainability of the town – “destination resort” as a strategy is not viable – we need to stop the departure of long-time residents and begin to build an economy which is not based 100% on the mountain
 - P.S. PLEASE develop a back-up plan for the airport. Why are we so focused only on the Mammoth-Yosemite scenario?

Advocates for Mammoth P.O. Box 2005 Mammoth Lakes, CA 93546

October 22, 2007

Town of Mammoth Lakes
Community Development Department
Attn: Jen Daugherty
PO Box 1609
Mammoth Lakes, CA 93546



RE: Snowcreek VIII, Snowcreek Master Plan Update – 2007 Project Draft
Environmental Impact Report

To Whom It May Concern:

The Advocates for Mammoth have completed an extensive review of the document, and are submitting this letter to identify portions of the document that are incomplete and require further data and analysis. As the document is currently written, we do not believe that it gives the decision makers the data they need to make their decision on the Project and as such should not be certified. We recommend that the document be redone and re-circulated.

B32-1

III. Project Description

Several assumptions are included in the Project description, which result in an incomplete analysis of alternatives. Explain and analyze the following:

1. *Discretionary Height Increase for Parking* - Ten foot height increases (to 45 feet) are presumed for understructure parking. However, certain code sections have changed to allow this discretionary increase for underground parking only. Show data for which buildings are requesting height variances, and which sections of the ordinance are specifically cited for each building. Include diagrams showing all structures requesting the height variance, with heights clearly marked and parking clearly identified as either understructure or underground. If the Project does not comply with the appropriate sections of the ordinance, submit an alternate design that allows for full understanding of this discretionary item and analyzes the environmental impacts.

B32-2

2. *Dwelling Unit Calculations* - Define a "Private Residence Club Unit" in terms of the existing zoning code and in terms of proposed occupancy factors. Show how the conclusion has been made that such units are eligible for 1/2 unit of density in the footnote to Table III-2. Re-analyze the environmental impacts at 1 unit of density.

B32-3

3. *2007 General Plan Economic Goal of Year-Round Occupancy and Recreational Capacity* – This Project presumes the same density concessions as the previous Development Agreement that was based on completion of the Sherwins as an alpine ski center with 8,000 skiers per day. No analysis has been made of what the additional residents in this Project will do while they are here, how long they will stay, and the

B32-4

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

impact on recreational activities that are already near capacity. Provide an alternative which is properly sized for the available retail/commercial activity and analyze all environmental impacts.

B32-4
(cont'd)

Also explain why the same density bonuses should be granted while the plan reduces the "Non-residential Commercial Space" from 150,000 square feet to 75,000 square feet. Provide an analysis of how many customers the remaining 75,000 square feet of retail and/or commercial space would serve for dining, how long visitors would shop in the retail space, and so on, and compare to services provided for 150,000 square feet plan.

B32-5

4. *Conceptual Diagrams and Figures* - Inadequate detail is shown in the conceptual plans. No building heights are noted, no trails and access points identified, etc. For every area where a conclusion is based on reference to the Project, such as "sledding will be provided," detail must be provided to identify the information. Provide the data used to arrive at the conclusions so that this can be fully analyzed.

B32-6

5. *General Store and Interpretive Center* - These facilities are not justified in the document and do not appear to be included to any significant degree in the analyses. The siting of these facilities violates the Town's vision of protecting viewsheds and the Mammoth Creek corridor (see fig II-6 view 5). We know of no current desire to have an interpretive center and parking at the proposed location, particularly if it compromises the view of the meadow.

B32-7

In addition to violating the view of the meadow and the stream corridor, the proposed market is poorly located from a traffic circulation standpoint and is probably too small to serve the Old Mammoth and Snowcreek areas.

B32-8

Provide data and analyze the environmental impacts of an alternative which moves the proposed Interpretive Center and General Store buildings, plus parking, away from Mammoth Creek and to a location within the Project on the south side of Old Mammoth Road.

B32-9

Note: Based on the current significant impacts to Mammoth Creek, which cannot be fully mitigated, we recommend the Interpretive Center be dropped. The site on the north side of Old Mammoth Road is also too small for the proposed facilities without encroaching into what we had understood would be protected by Snowcreek as part of the meadow.

B32-10

6. *Traffic and Congestion* - The economic prosperity of Mammoth Lakes is critically dependent on maintaining a community that remains attractive to visitors as a place they will want to continue coming back to visit. Anything that reduces our visitors' pleasure and enjoyment is a threat to our prosperity. High on the list of concerns is the need to avoid any increase in the traffic congestion we now already experience during winter and summer holiday periods. Those of us who study the traffic reports prepared by contractors to satisfy DEIR requirements are naturally skeptical about the ability of these "standard" computer models to accurately reflect the actual conditions we experience in this very special mountain resort community. These models do not even notice the congestion we already experience. How can they possibly accurately predict

B32-11

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

the future? Revise the models, and conduct experiments to allow fine tuning, until they demonstrate accuracy.	B32-11 (cont'd)
7. <i>Internal Circulation</i> – Data on circulation within and in/out of Project is not fully analyzed. Show data for the internal intersections that will accomplish the presumed smooth flow referenced in the narrative.	B32-12
Also, provide diagrams that support the conclusions regarding trails. There is inadequate detail provided within the text, figures, and diagrams to determine where pathways, trails, internal access roads, etc. are placed. Therefore, the conclusions cannot be supported without additional information and analysis.	B32-13
8. <i>Emergency Evacuation</i> – We can find no mention of emergency evacuation plans for the number of potential visitor and workforce persons and vehicles that would be attempting to exit from the one intersection at Old Mammoth Road and Minaret, including the existing traffic from the Old Mammoth residential neighborhood. Provide such a plan and the related environmental impacts.	B32-14
9. <i>Parking Analysis</i> - Show the parking mentioned for the Outfitters cabin, how the number of spaces needed was determined, and fully analyze the environmental impacts. Explain the factors used in determining the number of visitors and residents from the Town as a whole that could make use of this recreational feature and analyze the environmental impacts.	B32-15
Define the parking structure width and height that leads to the conclusion that the structures will "accommodate most private vehicles." Describe parking options for oversize and overflow vehicles, recreational trailers, etc.	B32-16
10. <i>Water Supply</i> - MCWD has withdrawn the funding of Dry Creek development from their rate structure. Until adequate water for the Project is established, either through conservation or by using proven resources, the Project should be put on hold, as was the mitigation measure approved in the 2007 General Plan Policy and DEIR.	B32-17
The DEIR states that, "Until these analyses are complete and specific projects have been approved to supplement MCWD's existing water supply, cumulative impacts associated with the Project and related projects would remain Significant and Unavoidable." Provide documentation demonstrating adequate sources of water, as we believe is required by State law.	B32-18
11. <i>Golf Course Environmental Impacts</i> - There is no detailed analysis of the golf course from an environmental standpoint. This area contains wetlands and drains into a sensitive water supply for both the Town and the City of Los Angeles. The area designated for the second nine holes may contain the last undisturbed prehistoric cultural material. During the land exchange discussions, questions regarding the environmental effects of the golf course were deferred as not needed at that time because a detailed CEQA evaluation would be required before the course could be built. This DEIR makes some casual references to how environmentally friendly the golf course will be, but little data is provided. A detailed Project description and environmental analysis must be done before this Project document is approved, since the golf course is such a key feature of the Project. Complete these actions and analyze the environmental impacts.	B32-19

Even if the plan is to contain the runoff in the ponds on the golf course, the information in the document is very incomplete, and it is impossible to analyze the environmental effects of the golf course. There is insufficient detail in the layouts to support the claim that all of the water will be retained. Also, there is no calculation or other substantiation to back up the claim that the runoff will only leave the course in a 100 year flood. Nor is there an evaluation of what environmental effects will be caused by these 100 year events.

B32-20

B32-21

Even if the runoff is captured in the ponds, the pesticides, herbicides, fertilizers, etc. must go somewhere. If they soak into the ground, they could soon end up in Mammoth Creek. If they stay in the ponds, the concentrations will build up and soon the birds and other wildlife will be affected. The obvious eutrophication that occurs in the current ponds by the end of the summer is evidence of a drainage (or more likely a lack of drainage) problem. Provide a complete environmental analysis of the golf course including elevations showing drainage patterns. The analysis must include detailed calculations of contaminate runoffs, absorptions, and/or concentration. Include enforceable mitigations.

B32-22

12. *A portion of the site zoned as OS (Open Space) would be developed with the Golf Course expansion, including a Golf Pro Shop, and an Outfitters' Cabin that rents and sells outdoor equipment.* These uses are not consistent with the Open Space definition, as they are not recreational uses or facilities but commercial enterprises. Change the Project description to be consistent with the Open Space Land Use Designation.

B32-23

13. *Effects of Project* – The Project claims it is being “proposed to allow the construction of previously proposed and planned for land uses, to provide these land uses in the smallest environmental footprint and with the greatest amount of open space area, to provide needed housing and employment opportunities to Town residents, and to provide recreational amenities to the Town residents and visitors.” These claims are not supported by data showing that any of these so-called objectives are met by the Project as proposed.

B32-24

14. *Assumption That Impacts Are Based On Less Than Full-Time Occupancy* - Several portions of Section IV. Environmental Impacts Analysis mitigate potential impacts by stating that the units will not be occupied full time. Describe each type of unit, the projected use and occupancy, and then reanalyze each of the following sections where a less than full-time use of the Project has been identified as a mitigating factor or as lessening the environmental impacts.

B32-25

IV-B - Aesthetics

1. Visual Character:

a) Page IV.B-11 states ski runs on the Sherwin range are visible under both summer and winter conditions. Define “runs” and provide an annotated image showing these runs, the historical access to and from this area, and analyze the usage over an average winter.

B32-26

b) Provide an additional reference point in the Existing Viewsheds section that is located at the proposed location for the Outfitters Cabin. Analyze all visual impacts

B32-27

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

west to the Project from this public access point on the eastern perimeter. The selected viewpoint on Sherwin Creek Road is too far away to be usable.	B32-27 (cont'd)
c) Change the location of the Panorama Dome View Point to the farthest southeastern section of the hiking trail. The point selected has the advantage of using the topographical feature of the Bluffs to hide most of the Snowcreek VIII Project. Rather, the point seen by hikers using the trail and looking east should be used to fully disclose the visual impacts.	B32-28
d) Recalculate the Project Building Heights in Figure IV.B-11, which currently appears to show that proposed 120 foot section is much closer to road than 1950 feet from Old Mammoth Road.	B32-29
e) Re-do Figure IV.B-13, View 5 with Project to the point mentioned in c) above to show the building footprints, as from this viewpoint, that perspective is what visitors on top of Panorama Dome will see, not only the heights of the Project.	B32-30
2. <i>Consistency with 2007 General Plan</i> – Explain the conclusions reached in the following sections of Table IV.B-2, starting on page IV.B-31:	
a) Celebrate Public Spaces – The analysis concludes that the Project design is consistent with design for the area without discussion. Show data used to reach this conclusion that this is consistent with the 2007 General Plan.	B32-31
b) Celebrate the Spectacular Natural Surroundings –	
i) The analysis interprets the new Policy C.2.1 as including the words “to the greatest extent feasible” which is not consistent with the policy as approved. Provide analysis consistent with the General Plan policy as approved.	B32-32
ii) Also, the analysis for Policy C.2.J. is inconsistent with the General Plan without a Zoning Code Amendment. It is facetious to state consistency, when an amendment to the General Plan would be required. The analysis therefore is not complete. Provide complete analysis.	B32-33
c) Sensitive Transitions – Several of the analyses conclude that sensitive transitions will be used. There is no definition for “sensitive transitions” between residential and other land uses in this document. Define the term and reanalyze the environmental impacts.	B32-34
d) Comfortable Building Height, Mass, and Scale –	
i) Again, building height and public views cannot be considered consistent, if Zoning Code Amendments are required.	B32-35
ii) In this same section, the analysis for Policy C.2.X. only references tree heights at the General Store/Interpretive Center location. Complete a tree height survey for the entire Project and reanalyze against the Town standards. Show how a 120-foot tall hotel and the tall high-density condominiums do not violate the intent of this key feature of the town’s vision to have buildings no higher than the tree canopy.	B32-36

3. *Building Heights –*

a) Page IV.B-51 references the 55-foot height limit in zoning code. Clarify which section(s) of the Zoning Code allowing the 55-foot height are applicable to this Project.

B32-37

b) No analysis has been provided regarding the windy conditions in the area of this Project. In fact, there is no recognition of the prior nickname of "Windy Flat", nor any wind speed/direction data provided. Provide analysis in relation to the design, and specifically the proposed heights of this Project, and both impacts on the structures from winds and whether this Project would aggravate those conditions.

B32-38

4. *Light and Glare - Page IV.B-55.* The analysis does not include any mention of light and glare as it relates to the Project's proposed exterior lighting for a 120-foot building. Any building taller than the zoning code must be analyzed, especially for any light trespass on surrounding areas. Provide this data for each building exceeding the 35 foot height limit.

B32-39

IV-C – Air Quality

The discussion of air quality is flawed and incomplete, and there is no quantitative demonstration of how the Project will meet the constraints of state and federal law.

B32-40

- The DEIR relies on the Town's obsolete Air Quality Management Plan, which has been overridden by ordinances adopted by the Great Basin Air Pollution Control District (GBAPCD).
- Potentially significant impacts are dismissed as insignificant without proof, in particular for ozone and particulates.
- There is no calculation of the concentrations of some pollutants to which residents of Snowcreek and the Town will be exposed.
- Mitigations are not specific, and the results attained by mitigations are not calculated.
- There is no quantitative discussion of how, exactly, the design of the Project will meet the state's greenhouse gas emission goals.
- CEQA mandates quantitative analysis and the DEIR is non-responsive in some respects.

B32-41

B32-42

B32-43

B32-44

B32-45

The following discussion amplifies these comments.

B32-46

Air quality is regulated by law and the GBAPCD has the power to halt activities that result in excessive emissions. There are no "overriding considerations."

As an example of improper reliance on the Town's Air Quality Management Plan, the GBAPCD's Rule 431, which took effect at the beginning of 2007, says that Phase II solid fuel burning appliances are required if installed in any unit, not just multi-family

B32-47

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

units. Discuss the impact of ordinances adopted since the AQMP was adopted, as well as others planned.	B32-47 (cont'd)
Because Snowcreek is remote from the main parts of Mammoth Lakes and the pollution monitoring station is at the Gateway Center, a separate monitoring station is needed at the most sensitive location within the Project area. This station must be tied into the GBAPCD system, and be under their control. Provide a plan and analysis for such a monitoring station.	B32-48
Ozone – Any increase in ozone produced by the Project over state-mandated levels is a significant impact, even if most of the ozone comes from the Central Valley. CEQA requires disclosure of the impacts, including cumulative impacts. Provide a quantitative analysis of ozone production and concentration as a result of Project activities.	B32-49
Note - The DEIR states that ozone concentrations are short-lived, but this is not true of the high-altitude ozone layer. This layer is maintained by solar radiation and is scavenged by nitrogen oxides and HFCs. The typical thickness of this layer at sea-level pressure is equivalent to 3.5 mm of pure ozone. As long as the Project prevents HFC and nitrogen oxide emissions, it will be doing its part.	B32-50
Carbon Monoxide – Even at present, traffic congestion worse than LOS D occurs on Minaret Road above and within the Village as skiers leave the ski area. Analyze the critical area on Minaret Road in front of the Village, where the tall buildings prevent free flow of air. Emissions should be analyzed in this area for worst-case holiday traffic in low visibility. Analyze the cumulative impact of the Project under these conditions.	B32-51
Particulates – California state law requires that the PM10 24-hour concentration be less than 50 ug/m ³ . The federal standard may not be exceeded, but the state standard is, and so particulate emissions from the Project are significant. Mitigation measures must include local control of road dust, vehicle emissions, and heating unit emissions. Provide an analysis of these emissions within the Project and the effect on Snowcreek residents. Also discuss and analyze seasonal variations.	B32-52
Construction and Operational Emissions – The DEIR gives the total mass of pollutants emitted, but does not calculate the actual concentrations in g/m ³ . These values must be calculated to determine the exposure to which locals will be subjected. Excessive levels during construction will require restrictions on construction operations, and operational excesses will require reducing the density of the Project. The GBAPCD can be expected to enforce the law. Provide data and analysis of these concentrations.	B32-53
Global Warming – The discussion in the DEIR begins by saying that the idea of global warming is a “belief” rather than a conclusion based on known facts and empirical evidence. This introduction is inappropriate, going against 99% of the scientific community, the Nobel committee, and California State policy, and must be removed.	B32-54

The energy output of the sun, the details of the radiation from a heated body, and the absorption spectra of greenhouse gases were established a century or more ago. The theory of heat radiation was one of the foundations of quantum mechanics. It is a straightforward calculation to show that these gases trap heat. Ice core data show an impressive correlation between greenhouse gas concentrations and global temperature for thousands of years. The amount of greenhouse gases introduced into the atmosphere by human activity is well known. The expected warming was calculated more than 20 years ago, and the number has not changed since. The temperature rise measured so far is about 0.7C, with another 0.5C expected even if there are no further emissions. The fact that temperature-rise is occurring as a result of human activities is incontrovertible. While predictions of some of the climatic effects of this temperature rise require complex climatic models, major effects can be predicted using everyday knowledge.

B32-54
(cont'd)

A town like Mammoth Lakes, dependent on snow for drinking water and economic survival, cannot afford to take global warming lightly. If voluntary measures do not work, we can expect stringent measures such as gasoline rationing that will severely impact Mammoth's economy.

After the introduction that appears to be an attempt to soft pedal the situation, the discussion of the greenhouse effect is competent, but lacks concrete discussion of the mitigations to be adopted.

Greenhouse Gas Impacts and Mitigations - The Project will have a significant impact if it increases greenhouse emissions, because the state's objective is to reduce them. To avoid significant impact, the Project must reduce net emissions to meet the state's reduction goals. One way to do that is to plant enough trees, not only to reduce those removed, but also enough to absorb the extra CO2 equivalent. These trees need not be planted on Project land, but Town ordinances or other measures must ensure their survival. Provide a quantitative analysis showing how the Project can achieve a net reduction in greenhouse emissions.

B32-55

The discussion of emissions sources is incomplete. We believe the document must discuss and be based on propane, as no natural gas available and the transportation and other effects of using this fuel have not been analyzed. The buildings are heated by burning hydrocarbons. Instead of natural gas, a fossil fuel, the buildings must be heated by burning alternative fuel that is carbon-neutral. Carbon costs of producing the fuel need to be included in the budget. Indicate what modifications in Project design are required to achieve this goal, and provide a quantitative analysis of the improvement in carbon emissions relative to the goal of net carbon reduction.

B32-56

B32-57

Electricity consumption is omitted as a source of greenhouse gas. This source must be added to emission calculations – not just from local consumption, but the fossil fuel consumption by the generating plants supplying the Town, including both generation and transmission losses. Add this contribution to the emission burden of the Project.

B32-58

The Project must adopt various mitigations to reduce electricity consumption. Decorative exterior lighting on buildings must be eliminated. Low-power lighting must be used (fluorescent or LED). Note that as long as rooms are heated, the savings from low-power lamps is reduced, because the heat will simply be turned up to compensate.

B32-58
(cont'd)

An important means of reducing the carbon costs of electric generation is to use combined heat and power (CHP), using the waste heat from furnaces to generate electricity. Provide an analysis of the gains to be achieved by this promising technology.

B32-59

Buildings must be designed to minimize heating needs, which implies that high-rise buildings must be eliminated in favor of cubical form factors. High-rise buildings also require increased pumping of water and any heating fluids, as well as elevators and other power-consuming amenities. Provide an analysis of the savings that can be achieved by more suitable form factors.

B32-60

All vehicles used by the Project, including construction and snow clearance vehicles and those used by the commercial/retail square footage, must use alternative fuels. Indicate what savings can be achieved by insisting on the use of alternative-fuel vehicles.

B32-61

This discussion indicates that substantial modifications are needed in both this DEIR and in the Project design to meet the state's greenhouse emissions targets, as well as control of the criteria pollutants.

B32-62

IV-D – Biological Resources

Impact of Increased Permanent Population – We question the DEIR's conclusion that the impact of the increased permanent population (given as approximately 11,460 persons) is "less than significant." Further, this section states that, according to the 2007 General Plan, the Town and Inyo National Forest Service will ensure that the regional ecosystem is maintained.

Rather, we advocate that the impact of population increase is very significant. Residents account for 25% of the visitor frequencies in the surrounding Wilderness or Forest Service Lands. An increase in people in these environmentally sensitive areas will result in degradation of recreational experience for all visitors: Increased traffic, pollution, trail degradation, destroying of wildlife habitat, permits for day hikes and restricted access will be the result of a major population increase in the area. Provide the data used, including current recreational use, and re-analyze the impacts on biological resources.

B32-63

IV-E – Cultural Resources

1. *The analysis lacks current or recent ethnographic material.* Written ethnographic materials are available for publications as far back as the 1920's. To analyze this important area without inclusion of materials that reflect the local area is not adequate. Provide analysis that includes appropriate ethnographic data.

B32-64

2. *Also not referenced is any mention of consultation with the Paiute community who are still living in the Eastern Sierra or whose ancestors lived in June Lake or Mammoth*

B32-65

Lakes. Many of these people still find food resources and materials for baskets in this area, just as their ancestors did. Provide data that includes input from the Paiute community.	B32-65 (cont'd)
3. <i>The most important site of cultural significance in the report is CA-MNO-3 a village site recorded over 50 years ago.</i> This site is referenced as large and significant, with a great potential for subsurface material as well as for buried historic material. Despite what has happened across the road to the north, the specific area relevant to this report, this is still true. Before construction can begin, mitigation measures must be in place to ensure protection. Provide adequate mitigation measures.	B32-66
4. <i>The report mentions that the area "... with dense prehistoric cultural deposits and midden soils, should be preserved, capped, or subject to data recovery if construction proceeds in this area as proposed."</i> We cannot stress this point more strongly! Provide mitigation measures that ensure that no excavation occurs that would prevent preservation of the cultural material that is present. The area proposed for the store and interpretive center and its parking appears to meet this definition. We recommend that this area be completely preserved as the last remaining portion of what may be one of the most important prehistoric cultural sites in the Eastern Sierra.	B32-67
5. <i>The discussions of the vegetation, the fauna, and the paleoclimate are well done but as mentioned above, the cultural context is incomplete.</i> There is current or recent work being done that should have been part of the research. The comment that "...most important cultural deposits {are} located north of Old Mammoth Road" is a moot point, since most, if not all, of that location is no longer available for research or preservation due to the excavation work for Snowcreek VII. Include the appropriate works and reanalyze.	B32-68
6. <i>Intervals</i> - Justify the stated interval of 20 to 30 meters where there is a dense area of cultural material visible on the surface as is mentioned on page VI-E-18.	B32-69
7. <i>The Summary of Environmental Impacts & Mitigation Measures is not adequate, and enforcement could still be questionable.</i> There is still room for value judgments and, while scientific data is open to interpretation, it is important that mitigation measures be followed and enforced. The mitigations need to be strengthened to ensure that they are followed. Provide realistic mitigation measures.	B32-70
8. <i>It must be clear that mitigation measures must apply to ALL the Project area including the golf course and other auxiliary facilities.</i> Local Native American monitors must be hired to oversee all intrusions into the earth and have the power to stop work if necessary. Change the mitigation measures to include this requirement.	B32-71
IV-F – Geology and Soils	
1. <i>Emergency Evacuation</i> - page IV.F-13 - Project impact related to volcanic activity is listed as "significant." The mitigation measure simply states that an emergency evacuation plan shall be prepared. This plan must be established and in place before start of construction. Provide mitigation measures that require a complete emergency evacuation plan be in place prior to the start of construction. Also, provide data and analysis on the efficacy of paving and using Sherwin Creek Road to Hwy 395 as part of this plan.	B32-72

2. *Soil Erosion/Loss of Topsoil - page IV.F-14* - Soil erosion and the loss of topsoil are considered to have a "significant impact." The mitigation that "a Storm Water Pollution Prevention Plan (SWPP) shall be prepared ..." needs to be strengthened to ensure that this plan is in place before construction begins. The plan must include twice-yearly stream surveys (chemical and biological) in Mammoth Creek both above and below all of the Snowcreek properties. Change the mitigation measures to include the surveys.

B32-73

Analyze this information and require these stream surveys, prepared by an independent consultant, as mitigation measures.

IV-G – Hydrology and Water Quality

1. *Preliminary Drainage Study* - The existing lakes and those to be built will contain all golf course and development runoff, which cannot be allowed to exit to Mammoth Creek via the culvert under Sherwin Creek Road. Provide alternative measures that protect the culvert area.

B32-74

a) *The existing lakes, as can be observed, are highly productive with significant late summer algal blooms indicating warm water, low dissolved oxygen, and lots of nutrients from golf course runoff.* The water in the lakes is considered to be of poor quality and must not be allowed to enter Mammoth Creek under any circumstances. Mitigations are required for both the re-worked original nine holes, and the new course. Provide the details of such mitigations.

b) *Surveys must also be done to monitor the effectiveness of the golf course settling ponds.* The ponds on the current 9 hole course and the new proposed ponds for the new golf course must also be monitored and dredged to prevent pollution such as temperature, dissolved oxygen, pH, conductivity, turbidity, fecal bacteria, hydrocarbons, metals, and nutrients and a visual assessment along the lakes and creek. Fish and macro invertebrates must be counted and identified.

B32-75

The analysis of water quality must be expanded to include potential impacts of the above pollutants, plus must answer the questions of (1) The length of time before these settling ponds/lakes fill with sediment, (2) how dredging of the lakes would be accomplished, and (3) analysis of the potential for the lakes to overflow into Mammoth Creek during periods of snow melt and/or high runoff from thunderstorms. Provide mitigation measures that will accomplish these surveys and analyses.

B32-76

IV-H – Land Use and Planning

1. *Outfitters Cabin Location – the proposed location for the Outfitters Cabin, as would any retail activity on the eastern perimeter of the Project, violates the land covenant established during the golf course land exchange.* The DEIR states, in the first paragraph on page VI.H-12, that the only allowed retail is associated with the golf course. Yet, the cabin is located in this area. In other sections, it is inferred that this is an approved retail use. The DEIR must be consistent and cannot have portions which make opposite conclusions. Rectify the inaccuracies, and correctly reflect the land covenant.

B32-77

2. *Transfer Of Un-Used Units Of Density* – Densities established as part of the original Development Agreement and Master Plan cannot not be considered as valid since 1)

B32-78

this is not consistent with the 2007 General Plan which does not allow a transfer of density from built units, 2) the original Development Agreement has expired, 3) the original DA and MP were based on 8,000 skiers per day at a ski area, and no comparable resort amenities are proposed to justify the proposed high unit densities, and 4) the new General Plan is less conducive to intensive development unless associated with a base ski facility.

B32-78
(cont'd)

The Project description does not specify the specific sites from which density will be transferred nor does it specify the sites that will receive the density. Without this information the DEIR analysis cannot address the impacts of this component of the Project. In addition, the DEIR provides no evidence for its assertion that density transfers, while prohibited by the General Plan, are permissible in this instance. Provide these details and reanalyze.

B32-79

3. *It appears that the density and land use calculations incorporate the 94 acres acquired in the Land Exchange to make the Project appear less dense.* It was clear during the land exchange negotiations, and in the writing of the covenant and in the Town's original definition of open space, that the land is not to be used for any type of residential or resort units. Therefore, this acreage cannot not be included in any density calculations. Recalculate the density without including the reserved open space acreage and analyze the resulting units per acre. Our calculations show this as closer to 20 units per acre than the "less than 8 units per acre" used in this DEIR. Recalculate the density without the inclusion of the land exchange area.

B32-80

4. *Reduction in Commercial Space* - The Town has set as an objective to increase the amount of commercial space. This Project reduces the amount of non-residential space by 50%. Most of the commercial space proposed will be of benefit only to the guests and residents of Snowcreek VIII, not to the Town in general. Redesign the Project with the original amount of commercial space, and reanalyze the environmental impacts.

B32-81

5) *Physically Divide a Community* - One of the mandatory requirements of CEQA is to determine if the proposed Project will physically divide a community. We believe that separating a community from what has been a significant source of recreation for a significant segment of the population meets this definition and that this impact must be disclosed and mitigated. As proposed this Project makes a large portion of the Sherwins inaccessible during deep winter snows.

B32-82

IV-I - Noise

1. *Construction Noise* - The analysis is lacking in the following areas:

B32-83

a) Identify the level of construction noise increase above current noise for the expected six years of Project construction.

b) Identify how many minutes per hour and how many hours per day during the six years of construction that the Town's Noise Standards would be exceeded.

B32-84

c) Identify options for modified projects and corresponding noise levels for these options.

B32-85

2. *On Site Noise – Expand the analysis to include the following:*

- a) The proposed Project will result in an increase in ambient noise level due to the generation of on site noise. Quantify what the noise level will be after mitigation measures are taken. B32-86
- b) Clarify what noise-creating businesses will be operating on the Project site, such as – bars, restaurants, etc. and provide data to show the locations within the Project and hours of operation as analyzed. B32-87
- c) List and analyze any noise-making outdoor activities that may occur on the site, such as concerts, festivals, events, etc. B32-88
- d) Provide data on the noise levels analyzed for the on-site affordable housing, which will be occupied on a full-time basis. B32-89

3. *Traffic Noise – Additional data is needed on the following:*

- a) The studies on current traffic noise were done in 2005. Provide additional data on the current noise levels on PEAK traffic days and times, and the predicted PEAK noise levels upon completion of all future development projects in the area. Reanalyze the impacts based upon PEAK traffic days and times. B32-90
- b) In projecting future noise levels, the analysis includes “Approved” Projects. Calculate noise levels that include future development of all available land in the surrounding areas. B32-91
- c) The proposed roundabout will eventually serve Snowcreek VII (under construction), Snowcreek VIII, the future Sherwin Project, the proposed General Store and Interpretive Center, the existing Snowcreek I, II, III, IV, V, and VI Projects, every existing and future project in Old Mammoth and also accommodate a pedestrian crosswalk. Show the effects of this traffic on (1) waiting time at PEAK hours to enter and leave roundabout and (2) traffic noise at PEAK hours of slowly moving/ idling traffic. B32-92
- d) Provide data on how many heavy trucks will be needed to service the residences, hotel, and businesses, including snow removal and snow hauling trucks. B32-93
- e) Calculate future projected roadway noise levels for Old Mammoth Road east of Minaret and for Minaret Road from Old Mammoth Road to Meridian Blvd. B32-94
- f) Calculate future projected roadway noise levels for existing residences on Minaret Road from Old Mammoth to Meridian, based on accurate measurements from roadway center to interior of the residences. B32-95

After expanding the data to include the above alternatives, reanalyze the impacts and mitigations needed. B32-96

IV-J Population and Housing

1. *Page IV J-2, Household Tenure* – The DEIR states: “There are more housing units in Mammoth Lakes than there are households, housing units are not affordable or available for the average resident,” and, “57.5 % are owned by second homeowners and are utilized on a seasonal, recreational, or occasional basis.” The type of housing needed in Mammoth Lakes is not more second homeowner units, but residential housing affordable for middle income families. In several places, this Project is described as consisting of housing-types that will add to the second homeowner housing segment.

B32-97

Page IV J-8, Impact POP-4: Further the DEIR states: The Project and the related projects, “would help address a portion of unmet housing demand and serve anticipated population growth in the Project area...,” and “Some of the employment associated with the Project could be filled by persons from the existing employment base in the Project area and/or by future residents at the Project site.”

B32-98

Provide detailed analysis and data to support the claim that the Project will provide needed housing.

2. *Page IV J-6, Impact POP-1: Since the Project will take five or more years to complete, the housing of construction workers will have a significant impact on rental housing availability.* Provide data to demonstrate where construction workers will be housed, how this will affect the housing availability in Mammoth Lakes, and what the affects will be on housing after the Project is completed and the temporary workers return to their places of residence.

B32-99

3. *Page V-2, Growth inducing impacts of the proposed Projects* – The DEIR states: “Because it is not expected that the nature of the jobs that would be provided by the Project would cause employees from surrounding areas to relocate their places of residence to the Project area, the Project would not result in long term employment growth in the area.” Yet the workforce housing needs are based on the assumption that “all 925 employees would relocate to the area, introducing 925 employee-related residents to the Town through indirect population growth due to the permanent jobs.”

B32-100

Also, “The police and fire departments would need to hire new staff to accommodate the demands created by the Project, and new school facilities would be needed for the school district serving the Project area.”

These statements suggest that the Project will result in the construction of unneeded workforce housing units while at the same time creating a greater need for residential housing. Provide data to clarify this conflict.

IV-K Public Services

1. *Police Services* – the analysis does not speak to this Project’s contribution towards employment of police officers. Rather, impact PS-2c speaks to the need for private security. Justify the need for a separate, non-coordinated security force and explain why this is a better mitigation measure than requiring funding of trained police officers.

B32-101

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

2. *Fire Services* – this analysis also does not speak to employment of permanent fire fighters, nor does it fully analyze the impacts of a 120-foot tall hotel on a mostly volunteer firefighting force. Provide this data and reanalyze. B32-102
3. *Schools* – the analysis must include a reasonable analysis of the number of students, not a reduced level excused by a statement that the units will not be full-time residences. Show how the numbers of students were calculated, and explain which units were included in the formula. B32-103
- IV-L Recreation**
1. *Page IV L-1, Project site:* The DEIR states: “No developed or undeveloped parkland exists on the Project site.” Rather, this land is used by the public for skiing, dog sledding, dog walking, hiking, and as access to the Sherwin Range, Kerry Meadow, and the Inyo National Forest. It may not be a formally designated “parkland” but it has been used as such as long as people have lived in the area. This statement is supported by the wording in the section “Local Setting” page IV L-2, “The surrounding Inyo National Forest land is heavily used for both summer and winter recreational activities.” B32-104
- Table IV L-1 and Table IV L-2 list active parkland and 23 types of recreational facilities existing in Mammoth Lakes. Many of these are not in Mammoth Lakes but in the surrounding area, and only a handful are actually fee-free and truly open to the public without cost, membership, permit, invitation, or traveling considerable distances. It does not list the currently existing driving range that this proposal will eliminate. B32-105
- Provide information demonstrating how blocking the area included in the Project from public access will not detrimentally affect the recreational opportunities for the community. B32-106
2. *Page IV L-5, Town Trail System:* Provide the guidelines for trail designation and development and projections for potential trails in the planning area included in the Parks, Open Space, and Recreation Element, and the Land Use Element of the 2007 General Plan. Demonstrate how the Project plan complies with these guidelines. B32-107
3. *Recreational Area Calculations* - Provide data to demonstrate compliance with the requirement to provide 150 square feet of on-site common/recreation area per unit. B32-108
4. *Page IV L-7, Impact REC-1:* The statement “the Project is intended to fulfill the vision of the previously approved 1981 Master Plan” is misleading. Not only is the 1981 Plan expired and no longer viable, but the original Plan included a ski area in the Sherwins which is no longer a consideration. The size, scope, design, and intent of the current proposal is very different from the original Plan. Provide information that is relevant to the current situation. B32-109
5. *Page IV L-8, Impact REC-1:* The Project will “expand the existing privately owned, but publicly accessible golf course” suggesting that a privately owned golf course is equivalent to parkland required by TOML. Provide data to support this conclusion. B32-110
6. *Page IV L-8, Impact REC-1:* Provide data to show that the public will not be denied access to, or required to pay for parking for, the recreational facilities included in the Project description. B32-111

- | | | |
|--|---|---------|
| <p>7. <i>Page IV L-9, Impact REC-1:</i> The statement "The Project would not physically alter or produce any direct impact on land within the Inyo National Forest" is contradicted by several other statements including "The National Forest land surrounding the Project site will likely experience increased use as a result of Project implementation." Provide data to reach a consistent conclusion regarding the impact of surrounding National Forest land.</p> | } | B32-112 |
| <p>8. <i>Page IV L-9, Impact REC-2:</i> It is stated that the "recreation elements available to paying Snowcreek guests and residents" include facilities previously listed as publicly accessible (i.e. ice skating pond and others). And, Page V-2: "The 75,000 square feet of non-residential space would serve the convenience needs of residents and would be accessible from within the site only." Provide documentation that these facilities will remain "publicly accessible" and access will not be denied. Further, show how the guests and residents will access the surrounding areas.</p> | } | B32-113 |
| <p>9. <i>Page IV L-10, Impact REC-2:</i> Provide documentation to support the conclusion "the Project would increase the overall amount of public and private recreation opportunities in the Mammoth Lakes area. Therefore, Project impacts affecting Town recreation facilities would be less than significant."</p> | } | B32-114 |
| <p>10. <i>Page IV L-10, Impact REC-3:</i> Requiring "persons who may have previously crossed the Project site to now hike around the perimeter of the Project site" is a major impact on recreation in the Project area and cannot be called "less than significant." The suggestion that supplying rental equipment to recreational users is an "opportunity" that mitigates the impact is unacceptable. Provide data to support this conclusion.</p> | } | B32-115 |
| <p>11. <i>Page IV L11, Impact REC-4:</i> Provide details as to how the Project's contribution to DIF will fully mitigate any impact that the Project will have on park and recreational services. Include analysis of how the impact of an additional 2,562 new residents, with 475 school-aged children can be considered less than significant. Include mitigations necessary if this impact is considered significant.</p> | } | B32-116 |
| <p>12. <i>Impact TRANS-4:</i> Provide analysis of the series of paths and walkways to accommodate pedestrians and bicycle use through links at various points to Old Mammoth Road paths, and the interior trails and sidewalks fronting internal streets as well as connecting from amenities, outdoor spaces, and residential areas that are included as part of the Project. Demonstrate how this results in connection and decreases traffic.</p> | } | B32-117 |
| <p><i>IV-M – Transportation and Traffic</i></p> <p>The analysis is incomplete in the following areas:</p> | | |
| <p>1. <i>The LSA report refers to a computer model prepared by the Institute for Transportation Engineers (ITE) to estimate peak traffic flows from total Average Daily Trips (ADT).</i> Provide details of this model and comparisons between the model predictions and actual test data for Mammoth to establish the validity of the model.</p> | } | B32-118 |

The results presented in the report are not credible. In effect, the peak traffic is obtained by dividing the ADT by 12 hours, implying the traffic flows evenly all day. We know this is not true. Vehicles stream out of housing units over 2-3 hours on weekend mornings heading to the ski slopes and return over 3-4 hours in the afternoon. Thus, the peak traffic must be about 3-4 times bigger than the results presented and will result in widespread congestion all over town.

B32-118
(cont'd)

2. *PEAK traffic conditions on a peak holiday must be shown, as required by CEQA.* The typical design day traffic will be exceeded half the winter weekends. No data is presented showing how bad the congestion will be on peak days.

In addition, the effects of snowstorms causing reduced visibility, snow piles and/or berms narrowing the streets, snow plows, and busses discharging passengers who then walk across the roads must be included. The models used are clearly wrong, as they do not show the congestion that currently exists. Now, the trip from the Main Lodge to Town on stormy winter weekends requires 1-1 ½ hours. Old Mammoth Road is totally congested under the same conditions. The congestion at Von's is not reflected in the results presented. Fix the models and demonstrate that the results confirm with current conditions.

B32-119

3. *Emergency Escape Routes.* The adequacy of current and planned routes has not been analyzed. Provide analysis of proposed mitigations.

B32-120

4. *Sensitivity of results to changes in traffic from that assumed must be shown. The data (i.e. appendix E) shows roads and intersections operating at 85% to 95% of maximum capacity.* Under these conditions the delay time will rapidly increase with small increases in traffic, or slowing, due factors not included in the analysis i.e. snow, pedestrians, accidents, etc. Provide the data that reflects realistic delay times.

B32-121

5. *Delays due to the difficulty of vehicles making left hand turns or entering from a side street to a road running nearly full, have not been fully analyzed.* The data in the appendices show a number of intersections operating at LOS F for left hand turns. This is barely mentioned and not discussed in the report. Reanalyze left turns and the impacts.

B32-122

6. *Bus transportation impacts need to be analyzed.* The report simply assumes that 15% of the visitors will ride the busses, hence reducing traffic. In fact, on Old Mammoth road the busses stopping and discharging passengers contribute to congestion instead of relieving it. Perform appropriate analysis utilizing actual data for Mammoth rider-ship, routes, schedules, and waiting time to get accurate estimates of the benefits and drawbacks of the bus system.

B32-123

7. *Impact TRANS-4* relies on the description of a series of paths and walkways to accommodate pedestrians and bicycle use through links at various points to Old Mammoth Road paths. It also states that interior trails and sidewalks, fronting internal streets as well as connecting from amenities, outdoor spaces and residential areas are part of the Project. The conclusion is that this results in connection and decreases traffic. Again, no detail is provided to support this conclusion. Provide the detail and reanalyze.

B32-124

IV-N – Utilities and Service Systems

1. This document clearly states that water supplies are unknown for the following reasons:

- a) The final EIR for Mammoth Creek will specify how much water the MCWD can divert from Mammoth Creek. This EIR has not been certified.
- b) New ground water wells in the Mammoth Basin will require environmental review and hydro-geologic analysis to ensure that additional volumes of water can be safely extracted. The completion of these studies are several years in the future.
- c) Dry Creek well development requires the same reviews and studies as the Mammoth Basin development and is 10 years in the future.
- d) The MCWD has two surface water licenses and one permit to divert a total of 2,760 AF/y from Lake Mary. This arrangement is temporary and there is a potential for these permits to be modified for less water diversion.

B32-125

2. *The DEIR discussion and analysis is inadequate in the following areas:*

- a) The water analysis clearly demonstrates that there is inadequate water for the Project "... in one dry year." What are we to expect when the typical 7-year drought cycle occurs?
- b) The analysis also includes the use of the Dry Creek area, which is not currently under consideration.
- c) There is no analysis of the impact of private wells identified for use on the golf course and the effects on the wells on the MCWD in the immediate vicinity. Analyze draw down data and project how both the Project and MCWD well will perform.
- d) Rewrite the UTIL – 5 et. al. mitigations to "will" and not "should" to reduce the impacts on water supply.

B32-126

3. Mitigation UTIL 5e – states that mitigations for the use of recycled water or untreated well water has not been determined. However, as MCWD has stated their intention to be ready by 2009. Identify the mitigations now.

B32-127

After incorporating the changes noted in 1 through 3 above, reanalyze the impacts. Unless it is shown to be insignificant, the size of the Project must be reduced to mitigate the impacts. Demonstrate how the completion of the Project at this time, under current circumstances, does not violate the 2007 General Plan Policy R.4.A. and that construction will be phased so that the development of necessary water supply sources is established prior to construction approvals.

B32-128

Project Alternatives:

This DEIR fails to provide an alternative that is within the zoning for the Project, meets the intent of the 2007 General Plan, and is scaled to reduce environmental impacts.

B32-129

Advocates for Mammoth Comments on Snowcreek VIII Draft EIR

There are nine impacts that are considered as Significant and Unavoidable within this DEIR. In addition, there are numerous conclusions, as noted in this letter, where a finding of "no impact" does not have data to support the finding.

These facts alone must call for a re-examination of the Project, determination of a more appropriate density and scale for this important piece of the community's future, and then follow with an analysis of that Project to determine environmental impacts. Without such an alternative, this DEIR does not provide the information necessary for decision makers to fully understand the impacts of the Project and make informed decisions, as is required by CEQA.

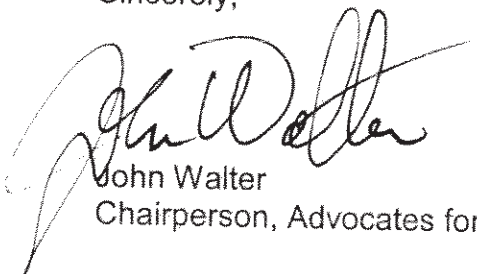
We agree with the DEIR's statement that the current plan is bad. It is outdated and no longer relevant to the vision outlined in the 2007 General Plan. But this Project, as proposed, is no better. We need a plan that carries through the past four years of effort by the community to define "what we want to be" and "what it will take to accomplish our vision."

The Town should move forward with the Plan Review Process and District Planning for this area and revise the Project to meet the community's goals, while not ignoring the fact that the environmental analysis is incomplete and must be finished and recalculated. This district planning must include the overall Town's vision, the completed sections of Snowcreek, the portions under construction, and, most importantly, must include the current Snowcreek residents.

One last feature of the report is particularly disturbing. Where certain environmental effects such as air quality, noise, aesthetics and light and glare are considered significant and unavoidable, there is no follow-up with potential mitigations to at least minimize these negative environmental effects. Propose mitigations to bring these effects in line with the Town's Vision Statement.

We look forward to continued involvement with the process to determine our community's future.

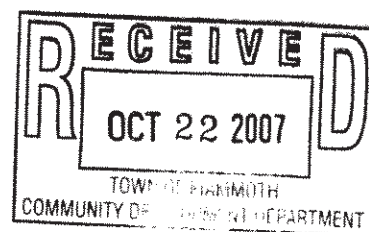
Sincerely,



John Walter
Chairperson, Advocates for Mammoth

B32-129
(cont'd)

B32-130



October 22, 2007

Town of Mammoth Lakes
Community Development Department
Attn: Jen Daugherty
PO Box 1609
Mammoth Lakes, CA 93546

RE: Snowcreek VIII, Snowcreek Master Plan Update – 2007 Project Draft
Environmental Impact Report

To Whom It May Concern:

Below are a few areas of concern I have identified within the DEIR, where the information provided is not adequate.

B33-1

1. Deer Migration - Mitigation Measure BIO – 4a is too broad, as written. Rather than an undetermined size and location for the Conservation Easement, the mitigation must recognize that the migration paths have been in place for decades. The location should be spelled out, in order for a complete analysis of the options to be available for consideration.

B33-2

Just as the Conservation Easement needs to be more fully analyzed and relevant to our unique setting, so must the proposal of a fence or deer under crossing along Hwy 395 be studied in detail to determine if it would be feasible in our community. Attempts to re-route wildlife in other areas have not been successful. Show proof that such measures would work here.

B33-3

Further, Mitigation Measure BIO – 4c speaks to limited use of herbicides and pesticides on landscaping, but makes no mention of the often-observed fact that deer will cross the golf course and wander through the Project, at their will. While the requirement for no fencing is an absolute, it is not enough. There is no discussion of whether or not landscaping would be deer-resistant. There are also no plans proposed for keeping deer out of the way of traffic on the internal roads. Please provide such information and reanalyze the impacts.

B33-4

Finally, there is no discussion of the multi-year phasing of construction will have the deer herd. Please provide data and discuss the long-term impacts.

B33-5

2. To presume that the Project has less impact because the units will be occupied less than full time is a specious argument. The DEIR cannot excuse a purported lesser environmental impact, without also discussing the economic impact of less than year-round occupancy. It is well known that second homeowner residences actually cost the Town for snow removal and other infrastructure that is not made up through funding

B33-6

derived from the Transient Occupancy Tax. Provide data to show how the proposed Project will meet the Town's goal of economic sustainability.

B33-6
(cont'd)

3. The Noise Analysis does not provide any data on the "daily living" operational noise to be expected from an increased number of residents and visitors. Especially for anyone traversing either the Mammoth Rock Trail or going into the Hidden Lake area, there will be increased noise accompanied with both the construction and operation of the Project. Provide data and analyze the noise impacts on the Inyo National Forest lands and existing neighborhoods abutting this Project.

B33-7

4. The discussions of access to, from, and around the Project ignore how residents and visitors would traverse to INF lands. Rather, the golf course seems to operate as a moat, separating this Project from the remainder of the community. Provide a design alternative and details to incorporate access to, from and around the Project.

B33-8

5. Design of Non-vehicular Circulation. While the document does not include any detail to determine the intended circulation patterns, the text refers to "...interior trails and sidewalks fronting internal streets...". Trails that are planned in juxtaposition to the vehicle access may not be the best or most desirable way to incorporate trails in the Project. Please include options that would weave non-vehicular access throughout the site, across the golf course, to the surrounding INF lands, and so on.

B33-9

Also identify the problems inherent with all project traffic funneling through the one access point, on the current Fairway Drive, and discuss alternatives to reduce the negative impacts. Finally, discuss how the proposed roundabout would promote and accommodate pedestrian crossings and non-vehicular circulation.

B33-10

Sincerely,



Jo Bacon
2112 Meridian #22
PO Box 100 PMB 134
Mammoth Lakes, CA 93546

B34**Jen Daugherty**

From: Stephanie Bradfield Cooper [phaniecoop@sbcglobal.net]
Sent: Monday, October 22, 2007 7:37 AM
To: Jen Daugherty
Subject: Snowcreek 8 comments

Please include my comments below in the public record regarding this EIR review. Thank you.

☐ B34-1

Stephanie Bradfield Cooper

----- Original Message -----

From: Stephanie Bradfield Cooper

To: akstapp@msn.com ; basecampcafe@yahoo.com ; eastmanhs@unedspeed.net ;
 wendy_sugimura@yahoo.com ; neilmccarroll@verizon.net ; saaris@qnet.com ; e10ney@npgcable.com ;
 barjur6@gmail.com ; duggan@mammoth-mtn.com ; j.bacon22@verizon.net

Cc: jcoop160@sbcglobal.net ; maryannnd@jps.net ; 'Mark and Tillie Newgard' ; 'Mark and Tillie Newgard' ;
 dmooddy7178@aol.com ; HLHADler@aol.com ; rclark@ci.mammoth-lakes.ca.us ; joyce_lu@hotmail.net

Sent: Friday, October 19, 2007 8:48 AM

Subject: Snowcreek VIII

Dear Council and Planning Commission Members:

I have several comments regarding the Snowcreek VIII development proposal and would like them included in the public record for this project:

☐ B34-2

Although I do not share Advocates for Mammoth concerns about density, they do raise several key points of objection to the project.

Height is of a major concern. All you have to do is stand on Panorama or Ridge Way to see the huge impact of height – the mound of dirt at Snowcreek VII gives you an understanding of how out of character excessive height can be. Successful major resorts, including ski resorts, especially in Europe, maintain their character and success in part because they have assured a “quaintness” that comes with the look of communities nestled in mountains. Santa Barbara also maintains a height limit, and is a fabulously successful tourist destination. Take a look at South Lake Tahoe, and you will see the impact of inappropriately placed high rises on scenic beauty and traffic.

☐ B34-3

No structure at the corner of Old Mammoth and Minaret Roads should **encroach on the Snowcreek Meadow**, nor should it excessively impact traffic. An interpretive center there is one thing, a “General Store” is an entirely different matter. You know well the shortage of grocery retail in Mammoth. But short stopping trips to Vons at that corner, already one of the most dangerous in town, is a very bad idea. Put it in the complex with the people, so they can walk to it (isn't increased walking one of your goals??).

☐ B34-4

☐ B34-5

In that same vein, a new development adjacent to existing condominiums must include **another ingress/egress point to Old Mammoth Road** to handle increased traffic. And now that Old Mammoth Road has been narrowed through town, you need to address how traffic from that project will funnel to the mountain – is it going to Minaret? What will the noise impacts be along that corridor?

☐ B34-6

☐ B34-7

Finally, **public access to the Sherwins** must remain. *Coastal property owners must provide access to beaches because beaches are public property; our mountains are an equivalent public resource and private property owners should not be allowed to develop huge new projects that cut off access to the mountains from residents or visitors.* We are not talking about a few private homes here – this is a giant visitor project with people coming and going all the time. I would think the forest service would have a similar concern, and ask that you assure they review this proposal. Sending many more people down Sherwin Creek Road or to the end of Old Mammoth Road to get to the mountains will increase negative impacts on those areas. Spreading access out along the range is

☐ B34-8

10/22/2007

the better environmental route.

— B34-8
(cont'd)

Thank you for reviewing and considering my comments.

Stephanie Bradfield Cooper

105 Panoramia Drive

PO Box 3749

Mammoth Lakes, CA 93546

760 934 1813

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269,15.5/1085 - Release Date: 10/22/2007 10:35 AM

**CALIFORNIA INDIAN LEGAL SERVICES**

Oakland • Escondido • Eureka • Bishop • Santa Rosa
Eureka Office: 324 F Street, Eureka, CA 95501 • www.calindian.org
Telephone: 707-443-8397 • Fax: 707-443-8913

B35**FAX TRANSMITTAL SHEET**

The information contained in this facsimile message is legally privileged and confidential information intended solely for the persons or entities named below. If you are not such persons or entities, you are hereby notified that any distribution, dissemination or reproduction of this facsimile message is strictly prohibited. If you have received this message in error, please call us at (800) 347-2401.

Please Deliver To: **Jen Daugherty**

Fax No.: **(760) 934-8608**

Send From: **Delia M. Sharpe**

Email: **dsharpe@calindian.org**

Phone: **707-443-8397**

Fax: **707-443-8913**

Date: **October 22, 2007**

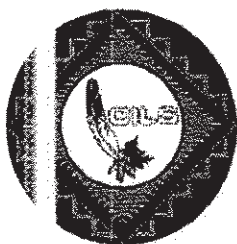
Subject: **Comments to DEIR for Snowcreek VIII**

Number of Pages: **5 (including cover)**

- ☐ Original will NOT follow
- ☒ Copy to follow: U.S. Mail
- ☐ Please Reply
- ☐ For Your Information Only
- ☐ Please Call Regarding This Matter – **URGENT**

Notes:





CALIFORNIA INDIAN LEGAL SERVICES

Oakland • Escondido • Eureka • Bishop • Santa Rosa
Eureka Office: 324 F Street, Eureka, CA 95501 • dsharpe@calindian.org
Telephone: 707-443-8397, Ext. 111 • Fax: 707-443-8913
Delia M. Sharpe, Directing Attorney

October 22, 2007

Town of Mammoth Lakes
Community Development Department
Attn: Jen Daugherty
401 Old Mammoth Road, Ste. R
Mammoth Lakes, CA 93546

Sent via facsimile at (760) 934-8608 and U.S. Mail

Re: Snowcreek VIII Draft Environmental Impact Report

Dear Ms. Daugherty:

On behalf of the Utu Utu Gwaitu Paiute Tribe and the Mono Lake Indian Community (hereinafter, the "Tribes"), I have had an opportunity to review the above-titled document regarding Snowcreek VIII (hereinafter, the "Project") and would like to offer the following comments.

B35-1

General Comments

1. The Town of Mammoth Lakes (hereinafter, the "Town") has within its borders a archaeological site that is extremely unique, in both the density of artifacts and in relation to such a large number of Indian Tribes. The Tribes respectfully request that the Town, together with all local Indian Tribes in the region, works to protect the integrity and historical value of this unique cultural resource. As such, the Tribes would like to emphasize respect for potential artifacts at the Project site(s) and request that the Town require preservation, wherever feasible, rather than data recovery. It is the Tribes' view that any data recovery being performed at the Project site(s) would likely be in a manner similar to that of past Snowcreek phases, which were more oriented toward minimizing construction delays than toward a true archaeological evaluation of the potential historical data.
2. The Tribes believe that the Town should reconsider the cumulative impacts that past Snowcreek phases have had on CA-MNO-3 (as required under CEQA). A true cumulative assessment would take into account each portion of each former phase that impacted the site, as well as the impacts of each readily-foreseeable result thereof. Given the array of former Project phases, the Tribes do not believe that a negligible cumulative assessment is appropriate.

B35-2

B35-3



Page 2 of 4

10/22/2007

3. The Tribes are concerned that "Areas of Known Controversies" include only "undiscovered archaeological and cultural resources", and not "cumulative impacts to a site of cultural significance" or "impacts to known cultural resources". The Tribes have previously expressed concern over both cumulative impacts and impacts to known cultural resources, neither of which have been adequately addressed or resolved.

B35-4

4. It is the position of the Tribes that the publishing of certain information as a part of this DEIR [in particular, the Archaeological Site Record for CA-MNO-3 (Update) in the Technical Appendices for Cultural Resources] on the Town's website is insensitive and may likely lead to the destruction of artifacts and other cultural items in and around the Snowcreek sites. The Tribes feel that if the Town had SB18 confidentiality procedures in place, publication of sensitive information such as this would not have taken place. Consultation with local Tribes before dissemination of such material would be in keeping with a government-to-government relationship. The Tribes suggest adding language to the DEIR regarding confidentiality of site records.

B35-5

Specific Comments

1. Table I-1, Impact CULT-1 Impacts to Known Cultural Resources, page I-30:

Comment 1. Golf Course: It is unclear whether or not ground-moving activities will occur as a part of the "Project-related changes to the golf course." If ground-moving activities will occur, the site should be subject to mitigation measures and monitoring, as it is within CA-MNO-3 and is extremely close to where high densities of artifacts were found. If the DEIR is going to state that impacts will be considered less than significant, additional information regarding the construction and capping should be provided.

B35-6

Comment 2. CA-MNO-3 North of Old Mammoth Road: Based on the cumulative impacts of the Snowcreek projects, the Tribes feel that the Town should limit mitigation options for any impacts north of Old Mammoth Road to preservation (i.e., plan construction to avoid site or deed conservation easements).

B35-7

Comment 3. Bodle Ditch: The table refers to Bodle Ditch, CA-MNO-893H, and says table will discuss project impacts with respect to site, but table only covers "Old Mammoth", CA-MNO-3. Final table should cover Bodle Ditch site, likely impacts to site, and what mitigation measures will apply to site.

B35-8

Table I-1, Mitigation Measure CULT-2a, page I-31: Table refers to a Mitigation Monitoring and Reporting Plan (MMRP). The MMRP will cover notification, protection, documentation, valuation, and curation measures for previously unrecorded cultural resources. Table states that the MMRP will be completed prior to any ground-disturbing activity.

B35-9

Comment 4. The MMRP should be completed with the input from the Tribes.



Page 3 of 4

10/22/2007

3. Table I-1, Mitigation Measure CULT-2b and CULT-2c, page I-32: Table refers to "qualified archaeologist" and "construction monitor" for portion of Project north of Old Mammoth Road.

Comment 5. Are "qualified archaeologist" and "construction monitor" the same person, as implied? If so, that should be clearly stated. If not, powers/duties of each need to be clearly stated separately. In particular, the duty to record work monitored and materials discovered and the power to temporarily halt work for evaluation or recovery need to be delineated.

B35-10

4. Table I-1, Mitigation Measure CULT-2c

Comment 6. The words "such as data recovery" should be eliminated from the last sentence, as under CEQA data recovery is the **least effective** means of mitigating impacts. The current wording implies that data recovery is actually the preferred option.

B35-11

5. Table I-1, Mitigation Measure CULT-2d

Comment 7. Under current law, the MLD has **48 hours** to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery.

B35-12

6. Table I-1, Impact CULT-3 Cumulative Impacts, page I-33: Table discusses the Project's potential cumulative impact on cultural resources, both to known and unknown cultural resources. It also refers to "related project sites", "related projects" and "applicants to the related projects". Table generally states that, with the mitigation measures described in CULT-2a through CULT-2f, no significant cumulative impacts will occur, although it also implies that there may be unknown cultural resources discovered at subsequent "related project sites", which will then be the responsibility of the "applicants to the related projects" to mitigate.

Section IV. Environmental Impact Analysis, subsection E. Cultural Resources, page IV.E-3: First paragraph under Archaeological Surveys states that "the survey intensity is not known for over 100 acres in the western portion of the Project site".

B35-13

Comment 8. Given the enormous amount of cultural material already discovered through the earlier phases of this Project, as well as uncertainty as to survey intensity in portions of the Project site, it seems quite possible (if not probable) that unknown cultural resources will be discovered at the Project site or at subsequent "related project sites". Given the size and likely durability of such a Project and related projects, there is a good chance that future access to or evaluation of unknown resources would be significantly impacted. Under CEQA, a cumulative impact assessment is intended to evaluate the incremental impact of a Project together with impacts of reasonably foreseeable associated or related projects.



Page 4 of 4

10/22/2007

On behalf of my clients, the Utu Utu Gwaitu Paiute Tribe and the Mono Lake Indian Community, I look forward to the Town's responses to these comments, and I appreciate the Town providing these comments the appropriate government-to-government weight required by law.

B35-14

Sincerely,
CALIFORNIA INDIAN LEGAL SERVICES



Delia M. Sharpe
Directing Attorney

cc: Utu Utu Gwaitu Paiute Tribe
Mono Lake Indian Community



Jen Daugherty

From: harmony webster [shaboosheba@yahoo.com]
Sent: Monday, October 22, 2007 8:11 AM
To: Jen Daugherty
Subject: from Jane Kenyon/Snowcreek 8 DEIR 2nd letter

Concerning Mitigation Measure BIO-1d in the Snowcreek
 8 DEIS.

Conducting ground vegetation removal outside of breeding season as it says would be the right choice.

But then it says OR....

The second mitigation about Buffer Zones basically offers Chadmar the opportunity to clear land when Songbirds are nesting throughout the meadow. The 25 foot buffer zone would not work for the meadow birds.

They would abandon their nests. The meadow Songbirds species will not let you within 25 feet of them.

The BIO-1d minimum buffer of 25 feet for songbird nests is not enough and is not an appropriate mitigation.

Lee Vining ornithologist Chris McCreedy, who specializes in the Willow Flycatcher, should be consulted and used for the pre-construction nesting bird survey for Snowcreek 8, to ensure vegetation removal is done before nesting season.

Most of the development in Mammoth has been permitted for June-peak Songbird nesting season, therefore causing declines to the Songbirds species in this region. The birds of this region are a resource to Mammoth. People and families come here from all over the world to see birds and wildlife that they don't have in the city. Birding is a popular recreation.

Our resource should not be constantly compromised for development and causing birds to fail in their attempts to maintain their populations. The land needs to be cleared before May 15 to protect the native Songbirds of the meadow. If any buffer zone would work, it needs to be 200-500 feet for all species. Blackbirds are probably the only bird that could handle loud trucks and machinery 25 feet away.

But clearly not for the meadow Songbirds.

The Snowcreek project is totally out of scale with what Mammoth is and would greatly impact Mammoth's Resources.

This Snowcreek project would further reduce Mammoth's wildbirds, our day and night viewshed, and the peaceful, safe mountain town atmosphere. It would take away what Mammoth sells. People come to Mammoth to get away from the city, to see nature, views, and the open space, that is eliminated from the city. The Snowcreek project would give the feel of the city with high density/traffic, and highrise buildings to block the viewshed. Chadmar also wants to take away our wildlife's essential riparian area (the Mammoth Creek wetland south of Snowcreek 1,2,3 (NW corner Minaret and Old Mammoth Rd) by building into an important riparian area that birds from Owls and Hawks to Ducks and Songbirds use for their survival. This development will make Mammoth more like the city than the mountain town it is, and will take away what is unique about Mammoth and why people come here.

Chadmar will gain, and Mammoth will lose its resources. The Snowcreek project needs to fit in with our mountain town.

The variance code does not apply to Snowcreek. There is no reason for variances to be granted to Chadmar.

Variances granted to Chadmar will impact Mammoth.

Residential condominiums at the 35 foot height limit is all that should be permitted. Commercial and highrise building out into the Mammoth Meadow viewshed will diminish the exceptional views. Mammoth will lose its great resource. Snowcreek 8 is out of scale with Mammoth.

The Snowcreek 8 project does not fit with the area in regards to size, height, traffic impact and community design. The project should only be approved at a scale and density fitting the current General Plan and neighborhood scale.

Please follow the guidelines in the Advocates for Mammoth evaluation of the Snowcreek 8 DEIS.

Thankyou,

Jane Kenyon
 PO Box 814 ML
 934-0372

B36-1

B36-2

B36-3

B36-4

B36-5

B36-6

B36-7

B36-8

B36-9

B36-10

Jen Daugherty

From: Hans Ludwig [sensitiveoutdoorsman@gmail.com]
Sent: Monday, October 22, 2007 11:59 PM
To: Jen Daugherty
Subject: Snowcreek viii draft EIR comments

Attachments: SnowcreekEIRCommentHL.doc



SnowcreekEIRCom
mentHL.doc (23 ...

comments are in the attached word doc-

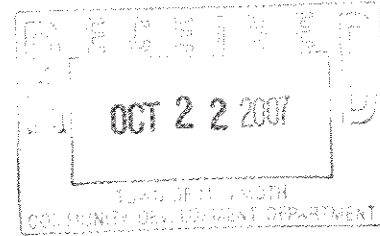
thanks you,
hans ludwig

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.5/1085 - Release Date: 10/22/2007 10:35 AM

Hans Ludwig
PO Box 9101
Mammoth Lakes CA
93546



Jen Daugherty
Community Development Department
Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, CA 93546

Re: Snowcreek VIII DEIR Comments

Dear Ms. Daugherty:

The Recreation aspect of the EIR is inadequate in its scoping and proposed mitigation. Specifically, Impact Rec-3 on page IV L-10, which addresses possible impact on local recreation. The draft EIR notes that some people have been crossing project site to access the Sherwin Range, and that they will (according to Chadmar's plan) have to walk around the perimeter proposed project site. The report finds this will not have a significant impact.

The builder is offering to build a "portal" for users as mitigation for the "non-significant" impact.

In fact, arguably the most popular winter use of the Sherwins area, by a huge margin, is backcountry skiing and snowboarding (not surprising in a ski town). The opportunity to ski high-quality powder and great terrain on public land right next to town is a big draw for skiers and snowboarders, and it is one of the busiest winter recreation destinations in town. The proposed development will make egress and access for skiers and snowboarders far more difficult, completely blocking off public access to the entire southern boundary of town. The Sherwins is unique because its proximity to roads allows skiing/boarding without specialized and expensive backcountry gear- that will end with the proposed project.

The proposed portal does not mitigate the impact- it could not be placed further away from the Sherwins and still be on Chadmar property, and it is already a public road.

Many golf courses operate as cross-country ski resorts, and there is plenty of room for a pedestrian right of way on the new or existing Snowcreek golf courses. There is a significant impact to local recreation from the proposed project, it has been inadequately scoped, and the proposed mitigation is insufficient.

Hans Ludwig

B37-1

B37-2

B37-3

B38

Jen Daugherty

From: Nancyapw@cs.com
Sent: Sunday, October 21, 2007 7:11 PM
To: Jen Daugherty
Cc: Bill Taylor
Subject: SnowcreekVIII
Attachments: CULTURE RESOURCES STUDY FOR THE SNOWCREEK VIII MASTER PLAN.doc

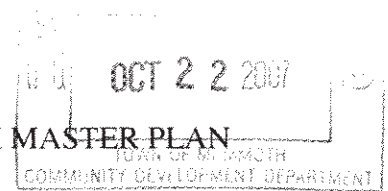
attached are my comments. If you have any questions please feel free to ask me.
telephone is 934-1767, e-mail is nancyapw@cs.com, fax is 934-4406.
Hope this transfers ok. Nancy Peterson Walter
PS thank you for your time the other day.

B38-1

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.15.5/1085 - Release Date: 10/22/2007 10:35 AM

10/22/2007

CULTURE RESOURCES STUDY FOR THE SNOWCREEK VIII MASTER PLAN
MAMMOTH LAKES, CALIFORNIA
BURTON & FARRELL



Comments by Nancy Peterson Walter, PhD
PO Box 2383
Mammoth Lakes, CA 93546

Oct. 20, 2007

760-934-1767

In reviewing the material written by Burton and Farrell of Trans-Sierran Archaeological Research, December of 2006, I found a document that is well organized but is lacking in current or recent ethnographic material as well as not noting anything about Native American Values. Granted, most of the work done in this area is by anthropologists with a background in archaeology, but, there is work that has been done by ethnographers who have written material on the area as well as other scientists who have worked with local Paiute including but not limited to: Aldrich, J.M. 1912, 1921; Eldredge, I.F. 1923; Englehardt, George P. 1924; Miller, John and Wallace Hutchinson 1928; Patterson J.E. 1929; Simms Steven R. 1984; Warren, Dick 1963; Way, Guy S. 1920. When Catherine S. Fowler, PhD, an ethnographer at UNR and I wrote about Harvesting Pandor Moth Larvae with the Owens Valley Paiute in 1985 based on our work in 1981 we had no problems finding the above scientific references. All work done in the Mammoth Lakes area!

B38-2

There is material referenced in the HANDBOOK OF AMERICAN INDIANS, GREAT BASIN INDIANS Volume 11 about the Shoshone and Paiute of the Eastern Sierra and ethnographers who do continuing research are referenced. Dissertations have been written about the hunting of the pronghorn antelope; the relocation of the local Paiute and Shoshone to the current reservations; there has been linguistic work done in the Eastern Sierra; research has been done on the location of plant resources used; and there has been at least one master's thesis written dealing with historic photographs. None of this ethnographic material was referenced. Also not referenced is any mention of talking with the Paiute community who are still living in the Eastern Sierra – those in Bridgeport, Lee Vining, Benton, Bishop, Big Pine, Independence, or Lone Pine. Or to those who grew up or whose ancestors lived in June Lake or Mammoth Lakes. Many of these people still find food resources and materials for baskets just as their ancestors did in this area.

B38-3

B38-4

The most important site of cultural significance in the report is CA-MNO-3 a village site recorded over 50 years ago which is considered to be a Historical Resource. This site is referenced as large and significant with a great potential for subsurface material as well as for buried historic material. Despite what has happened across the road to the north, for the specific area relevant to this report, this is still true and before construction there are several factors to consider so that the loss of material that has happened in one area does not occur in the remaining areas. The lithic scatter on the north side of the road as well as bedrock mortars are still visible. The report also mentions that the area "... with dense prehistoric cultural deposits and midden soils, should be preserved, capped, or subject to data recovery if construction proceeds in this area as proposed." (p iii) I cannot

B38-5

stress this point more strongly! I feel that data recovery is the least important since no excavation, preserves for the future the cultural material that is present. There should be enough data available from the preliminary survey, much less from the Snowcreek VII area that more excavation is not necessary. A good technical report on Snowcreek VII has still not been done.

B38-5
(cont'd)

When a project physically demolishes, destroys, relocates or alters the historical resource or its immediate surroundings such that a significance of the historical resource is materially impaired – this is a substantial adverse change and must be mitigated (CCR 15064.5).

The discussions of the vegetation, the fauna, and the paleoclimate are well done but as mentioned above, the cultural context is incomplete. The prehistory is well covered but the ethnography is not up to date other than what “used to be” or what is called the “ethnographic present.” There is current or recent work being done that should have been part of the research. The comment that “...most important cultural deposits {are} located north of Old Mammoth Road.” on page 14 is of interest since most if not all of that location is no longer available for research or preservation. What is left of CA-MNO-3 north of Old Mammoth Road should be preserved and buildings proposed there should be relocated.

B38-6

When reviewing cultural resource reports for Los Angeles and Ventura Counties I found that 20 to 30 meter intervals (transects) was not sufficient for areas when there was a dense area of cultural material visible on the surface as is mentioned on page 18. The general spacing for intervals is three to five feet. Given the density of the vegetation on the ground, it is unlikely intervals of 20 to 30 meters would show many artifacts for most would be missed.

B38-7

I was shocked that the report found there was no data recovery done for the area mentioned on page 20 when the two ornamental ponds and the construction of the rental office was done. This area was an area of known cultural significance yet no mention of monitoring and no mention of test pits in an area that Leonard (1974) had recommended as a preserve as well as an area that Burton and Farrell (2006) indicate “...that there are still substantial prehistoric and possibly historic cultural materials...” if work did not follow recommended procedure in the past how can we be assured it will in the future?

B38-8

I do not feel the Summary of Environmental Impacts & Mitigation Measures is adequate, since we now have our new General Plan, enforcement of it could still be questionable. There is still some room for value judgments and while scientific data is open to interpretation, it is important that mitigation measures be followed and enforced. The past record here in Mammoth Lakes has not always had the necessary follow through that is important. It is rather upsetting to find out artifacts were taken home by workers via an overheard conversation at a Lee Vining football game even if it may or may not be true. There is a definite need for contractors as well as staff, planning commission, and location workers to be made aware of the laws that apply to cultural resources. I would

B38-9

strongly stress the need for a workshop on this issue to avoid problems before they happen. I do not feel the staff, the Planning Commission, the contractors, their workers, or the developers are aware of laws that pertain to Cultural Resources since they feel it just delays their work.

B38-9
(cont'd)

It should be clear that mitigation measures must apply to ALL the project area including the golf course and other auxiliary facilities such as a store, interpretative center and outfitter buildings. Monitors must be hired to oversee all intrusions into the earth and have the power to stop work if necessary. What anthropologists see as a feature may not look like a feature to construction workers or a work boss. There are times when a project of this importance may require consultation with other anthropologists who work in the area and are familiar with the various types of habitation, variety of sites, differences of work areas as well as material that may be from Queen, Bodie, or Casa Diablo sources. The references in the report do not say how the determination that some of the obsidian was from Queen (the area of Truman Meadows off Highway 6) is not explained nor is there relevant information in this report to explain why this might be important.

B38-10

There are acceptable mitigation measures discussed in the CEQA guidelines for Historical Resources.

1. Rehab, restore, repair, stabilize, preserve, conserve, in accordance with Federal Standards (buildings). Documentation alone does not reduce impacts to less than significant!
2. Avoid all together.
3. Preservation in Place
4. Data recovery for archaeological sites (CCR 15126.4 {b}).

B38-11

The data recovery plan which makes provisions for adequately recovering the scientifically consequential information from and about the Historical Resource SHOULD BE PREPARED AND ADOPTED PRIOR to any construction excavation (15125.3 {b} {3} {C}). This would allow for Preservation in Place to occur with a minimum of impact to the archaeological site.

Monitoring construction is not considered a mitigation measure which reduces impacts to less than significant ---- as demonstrated by the 440 bifaces recovered in one tree root during construction. One way that can be used to “get out” of doing data recovery is to argue that previous studies have adequately recovered the scientifically consequential information from and about the Historical Resource. This fact was cited in my conversations with the Town Planner, i.e. the material found when excavating the ditch area was similar to that found at CA-MNO-3. The problem with this is that the fact has to be documented in the EIR and the studies that report on the scientifically consequential information have to be deposited at the appropriate CHRIS Info Center. To date that information has not been available to me or to other reviewers. So I would like to submit that the current report does not support the lack of data recovery.

B38-12

B38-13

The fact that CA-MNO-3 is significant makes it eligible for the NRHP. This was also mentioned on page two in the “only” peer review in the report which was done by SWCA in South Pasadena. I do not feel that only one peer review is adequate for this type of development or for a village site this large. I am also unhappy about the page two comments in the peer report that says “No further archaeological work is recommended for the portion of CA-MNO-3 south of Old Mammoth Road.” The lithic scatter on both sides of the road and the abnormal transects (intervals) to look for surface data makes this statement not a very good peer review. I would like to know how much work in the Eastern Sierra the people preparing the peer review have done. They also do not reference or mention the lack of ethnographic work or anything about Native American Values.

B38-14

B38-15

B38-16

RECEIPT OF DELIVERY

**Document: Comments on Snowcreek VIII Master Plan DEIR (4-pages) and
Comments by GHH Engineering (18-pages)**

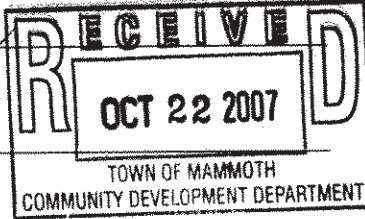
From: Snowcreek V, Fairway Homes II Owners Association

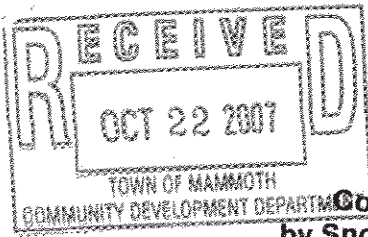
By: Town of Mammoth Lakes

Initials: AL

Date: _____

Time: _____





October 22, 2007

REVISED
Comments on Snowcreek VIII Master Plan DEIR
by Snowcreek V, Fairway Homes II Owners Association

Ladies and Gentlemen:

Homeowners of Snowcreek V are certain to be impacted by the proposed Snowcreek VIII project, and the Fairway Homes II HOA, which represents 146 residences, would like to express some of our questions and concerns on the DEIR. (For background, Snowcreek V consists of 296 residential units, 150 of which are in Fairway Homes I HOA, and 146 of which make up Fairway Homes II HOA.) Fairway Homes I will be submitting a letter with their questions and concerns, which are similar to ours. Fairway Homes II has hired 2 experts on Land Planning and on Hydrology, to review and comment on the impact of this plan on Snowcreek V. **In addition to the comments below, a memo prepared by a civil engineer commenting on project specific and cumulative hydrology issues is attached.**

B39-1

Our most important concerns are:

- Preserving the quality of life that we currently experience as Snowcreek V residents during the construction period and afterward, especially in light of the nine (9) Class I significant and unavoidable impacts, and
- The handling of the water movement and runoff from the **Mammoth Meadow**, assuring that this construction not only does not add to the problems already being experienced by the Snowcreek V residents but also finally rectifies the drainage problems of the entire meadow.
 - To understand this issue, the commission should know that each homeowner of Snowcreek V has been assessed between \$10,000 and \$30,000 during the past two years to try to correct problems that came about from inadequate planning or execution of the hydrology plan for Snowcreek V.

B39-2

The Snowcreek VIII Master Plan Update Draft EIR indicates that the project results in nine (9) Class I, significant and unavoidable impacts; six (6) Class I impacts in the area of aesthetics; two (2) Class I air quality impacts; and one (1) Class I impact to the Town's cumulative water supply.

B39-3

Further, the project is inconsistent with several of the Town of Mammoth plans and policies related to aesthetics/visual impacts. A negative precedent is set if the Town of Mammoth approves of a project which is inconsistent with several of it's own General Plan and land use policies.

B39-4

Specific concerns with the Snowcreek VIII, Master Plan Update DEIR are as follows:

1. Aesthetic/Visual Impacts: Approval of the project will result in six (6) Class I impacts to aesthetic resources. Most significant of these impacts is that the proposed height of structures will obstruct important public views and scenic vistas. For Snowcreek V, the view shed of the southern residences, which include both the Sherwin and the White Mountains will be negatively impacted. The 400-unit hotel and private residences are proposed to be up to 120-feet in height, greatly exceeding the Town's 35-foot height restriction. Amendment of the Town's zoning code would be required to approve of the project height. The proposed height of structures results in significant

B39-5

and unavoidable impacts, which violate several of the Town policies. A 120-foot structure in the proposed location would not be compatible with the surrounding development and would severely impact the view corridors and important scenic view sheds. We believe that an alternative could be found which reduces the height of the hotel and private residence structures to more reasonable building heights.

B39-5
(cont'd)

2. Project Specific and Cumulative Air Quality Impacts: The project results in Class I impacts to Air Quality. As the DEIR indicates, the generation of PM10 emissions (particulate matter) as the project is built will have significant project specific and cumulative impact to the community. Since the project will not be completed until the year 2017, these should not be considered "short-term" impacts to the community. If the project was reduced in density, air quality impacts could be reduced.

B39-6

Additionally, we do not feel the proposed mitigation measures for this environmental impact are extensive enough. In regards, to mitigation (h) our recent experience with the temporary grading permit to move dirt on the discussed site has been that the construction traffic drives at high rate of speed that is extremely unsafe for a very narrow and curving road. We ask that a mitigation measure of a separate construction road from the road into the Snowcreek V be required.

B39-7

In regards to point (l), the proposed project is in a natural "wind corridor" and it should be expected that the wind will frequently exceed 25 mph; hence, we feel this area requires stronger measures to reduce blowing dirt as it will be a usual rather than unusual event.

B39-8

3. Hydrology and Water Quality (Drainage Pattern Alteration): It is essential that this impact be reclassified as Class I. Until the proper agencies and Christopher A Joseph & Associates completely understand the water flow patterns from the Sherwin Mountains, Mammoth Meadow, through Snowcreek V, The Lodges, Snowcreek Golf Course and across the proposed Project then it is not feasible to understand the environmental impact of building this Project. We certainly have the right to ensure that this Project does not exacerbate an already very serious problem that we have of excessive moisture under our structures and inadequate drainage throughout Snowcreek V. This problem has already created significant structural issues and has the potential to create health issues.

B39-9

4. Cumulative Water Supply Impacts: The DEIR indicates that the project results in a Class I, cumulative impact to the Mammoth Community Water District. Please require that the applicant adhere to mitigation measure that phases development commensurate with available water supplies. Even with this mitigation, a significant and unavoidable impact to the water supply is anticipated with full build-out of the Master Plan and other planned projects. How does the Town propose to supply this and other projects with water, as well as ensure that existing development has adequate water supply in the future?

B39-10

5. Noise: We disagree that the mitigation measures are adequate for noise abatement during the construction process simply by complying with the town ordinance regarding hours of operation. For example, a property that is only 100 feet from the construction site (as described in the DEIR) who experiences constant noise from 7AM to 8 PM, Monday through Saturday, will be an unhappy citizen, indeed. Especially those waking up to tractors and dirt movers at 7AM while on vacation. It

B39-11

has the potential to harm our quality of life as well as our property values. We suggest that a monitoring and dispute resolution system be agreed to between the town and the builder.	B39-11 (cont'd)
6. Public Services (Snow Removal): While the statement is true that this project would not impact the Town's snow removal, we are requesting that the EIR address how it will impact Snowcreek V's snow removal and snow storage. Currently, Snowcreek V's snow storage is extremely inadequate as the original developer stored snow on the undeveloped land of the proposed Project.	B39-12
7. Recreation: It is our understanding that the Mammoth Lakes Trails and Public Access is preparing a report on the recreational impact of this Project. We will withhold our comments until the report is completed and reviewed.	B39-13
8. Transportation/Traffic: The DEIR proposes to reroute road access to Snowcreek V through what will be a construction zone for many years, and then through this dense development. If you drive down the current access road at any time and you will see residents with their families and pets walking, running, and on their bikes going into town. This is consistent with the Town Vision of promoting non-motorized transportation, and would be made much more difficult and less appealing if rerouted through the Snowcreek VIII development. We ask that a separate, efficient access road to Snowcreek V should be maintained and Snowcreek V should be connected to the walking and biking trails planned in Snowcreek VIII. As mitigation for the disruption and congestion forced upon Snowcreek V residents, and to further minimize the town traffic impact, the Red Line bus route and Snowcreek VIII shuttles should includes stops at Snowcreek V.	B39-14
9. Utilities and Service Systems (Waste Generation): Snowcreek V has already had wastewater problems and we ask that this plan ensure that Snowcreek V is connected to the city facilities separately from Snowcreek VIII.	B39-15
10. Construction Related Impacts: The DEIR does not adequately quantify the construction related impacts of the project. Full build out of the project will not be realized until the year 2017. Ten years of construction should not be considered "short-term" impacts to the community. This is a long time for the community to be subject to construction noise, dust and traffic from the proposed project. A reduced density project would result in shorter construction duration and less of these impacts.	B39-16
11. Alternatives: We believe that the Alternatives Section does not provide a "reasonable range" of alternatives intended to reduce the impacts of the project. The DEIR indicates that Alternative C is the Environmentally Superior Alternative. Alternative C reduces the residential component significantly and eliminates the hotel/retail and expansion of the golf course project components altogether. Since Alternative C does not provide some of the beneficial project impacts (i.e., golf course, hotel bed tax, etc.) and does not meet the objectives of the project, the Town is not likely to approve of this alternative. The EIR consultant should analyze an additional reduced density alternative, which reduces the density, but still realizes the majority of the project objectives. This alternative would include all the components of the proposed project, but at a reduced density and scale. The intent of this reduced density alternative would be to lessen the visual impacts, eliminate the need for an amendment to the Town's zoning code (height restriction) and reduce overall construction related impacts that result from the proposed project. This reduced density alternative would	B39-17

- reduce all of the impacts and still meet the objectives of the project, which is the intent of the Alternatives section according to the CEQA guidelines. ☐ B39-17 (cont'd)
12. We ask that the town require mitigation monitoring to ensure that the proposed mitigations are effective. The Town should be responsible for mitigation compliance, or hire an outside consultant to ensure that the mitigations proposed for this project are in place and effective. A monitoring component should be in place for the duration of project construction and beyond in some instances (i.e., biological resource monitoring). ☐ B39-18
13. We support the project's inclusion of the 80 units of work-force housing. ☐ B39-19
14. We support the mitigation measure, which requires that the residential component of the project be constructed only as the market demands it. ☐ B39-20
15. We support the requirement that project components can only be developed if there is adequate water supply to support the proposed use. ☐ B39-21
16. We appreciate Chadmar's time and efforts to design a project with the intention of blending into our rural setting, and promoting the active outdoors lifestyle of our community. Certainly, our positive experience with the completion of The Lodges promises the continuation of a desirable Alpine community that will enhance the value of Mammoth town and its environs. We hope to cooperate with the builder to the completion of this ambitious project. ☐ B39-22
17. **An informal meeting was held on October 17, 2007 with representatives from the U.S. Forest Service, Town of Mammoth Lakes, Mammoth Community Water District (MCWD), Chadmar, Snowcreek V HOA and Intrawest; to discuss the Mammoth Meadow Restoration Plan. At this meeting, it became apparent that the Meadow has a very complex geological structure and there are apparently at least two loosely connected aquifers in the Meadow as evidenced by the MCWD test wells. The hydrology issues with the Meadow are so complex that the MCWD staff does not have a model to comprehend the extent of existing or potential impacts from the seasonally fluctuating Meadow water table and its possible effects on existing and future developments. As mentioned in the third comment of this memo above, we are very concerned that the hydrology and drainage of the Meadow is not understood adequately enough to move forward with development which could result in additional drainage impacts both to the proposed and existing developments.** ☐ B39-23

We ask that the DEIR be revised to address the above issues. ☐ B39-24

Sincerely,

The Snowcreek Fairway Homes II Owner's Association Board

Jack Oswald, President
Ron Caird, Vice President
Ted Stern, Secretary
York Sutch, Treasurer
Lauren Hipp, Member at Large

Response to Request for Public Comment to Snowcreek VIII EIR (September 2007)
(y:\staff\jc\6170\Comments September 2007 on Snowcreek VIII EIR
Prepared on behalf of Snowcreek V Fairway Homes II Owners Association by GHH
Engineering, Inc. by Gary H Hall P.E., President and John P. Church PhD, R.G.

Executive Summary:

The EIR for Snowcreek VIII states that groundwater is as shallow as 2 feet below ground surface. Mitigation measures are necessary to protect the buildings from snow runoff high groundwater, off site drainage on to the development site, and that maintenance procedures to maintain the drainage system are necessary.

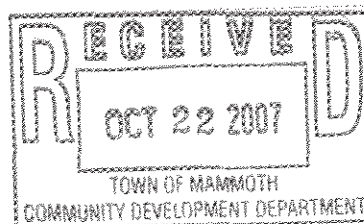
B39-25

Similar comments and recommendations were made during the EIR review and approval process for the Snowcreek V development by consultants, the Regional Board and other regulatory agencies. However, to date none of this has been implemented for Snowcreek V.

Design for a 100-year storm event is far more appropriate for off site drainage management than the 20-year storm criteria used for design of the Snowcreek V storm drain system which has proven to be inadequate, and resulted in surface and subsurface damage to the Snowcreek V development. Hydrologic calculations have shown that the 100-year storm criteria will not provide adequate capacity for the storm water drainage system at Snowcreek V. During extreme conditions the drainage system may have to accommodate more than 10 million cubic feet of groundwater and 50 million cubic feet of surface runoff During a six month wet weather season. Before construction on Snowcreek VIII can proceed Chadmar must correct the drainage system for Snowcreek V, which will only further impact the proposed retention basins in the meadow. A complete drainage basin hydraulic analysis for 2, 5, 10, 50 and 100 year storm events should be submitted for analysis prior to any conditional approvals of the proposed EIR.

B39-26

After reviewing the general concept of infiltration to control and manage runoff it is my professional opinion the system as proposed will be unreliable and prone to seasonal flooding, and actually increasing the groundwater levels further impacting substructures in the area. Obviously the best engineered solution would be to collect the water in a properly designed drainage conveyance system and remove the runoff from the area to a surface water discharge. However this would create a point source discharge and increase the drainage costs significantly.



Draft Environmental Impact Report

Introduction, [page I-1]

Table 1-1 Summary of Environmental Impact & Mitigation Measures (page I-15)

Hydrology & Water Quality (Hyd) [Page I-38]

Environmental Impact Section HYD-1 Groundwater Depletion or Recharge
[page I-40]

- a. Statement: there could be substantial impact if development interferes or depletes groundwater recharge [page I-40].

GHH agrees.

- b. Groundwater seepage was encountered as high as 2' below ground surface (bgs) and as low as 8.5' bgs. [page I-40]

This is consistent with groundwater data collected by GHH.

- i. In the Regional Board letter regarding *Comments on the Storm Water Prevention Plan (SWPPP) for Snowcreek V Townhomes, Phase 11-14* dated May 07, 1999 informed Triad that minimum separation between high groundwater and the bottom of retention basins is 5'.
- ii. **The information above confirms GHH's assertion in the *Snowcreek Summary* completed in April 2007 that high groundwater levels will invade that basin and reduce its retention capacity. This means that the drainage system for Snowcreek V was not adequate. Chadmar must correct that.**
- c. "...structures need to be protected from high groundwater levels." [page I-40, bottom paragraph left column]

This has not been done for Snowcreek V resulting in water damage and structural damage to the crawlspaces. No substructures were water proofed as required.

- d. All underground structures shall be designed with exterior wall drain board to a footing drain system as well as under slab subdrains, Crawl spaces shall be protected with proper ventilation and sub drains.Sub drain design shall be adequately sized so that retention basin capacity is maintained for storm water retention purposes.

B39-27

B39-28

B39-29

B39-30

These steps are equally necessary for Snowcreek V, were not done and need to be corrected by Chadmar before work on Snowcreek VIII commences. [page I-40, Mitigation Measure HYD-2]

B39-30
(cont'd)

- i. A detailed set of maintenance procedures necessary to assure that storm drainage facilities continue to work as designed shall be established and approved by the Town in consultation with the RWQCB.

B39-31

This is also necessary for Snowcreek V and was not done although the SWPPP for Snowcreek V Phases 11-14 dated March 1999 stated it would be done. This must be done for Snowcreek V before construction begins on Snowcreek VIII.

- e. The EIR states that proposed retention basins along Old Mammoth Road have been sized to retain and infiltrate runoff from Snowcreek VIII and previous developments. [page I-40, Environmental Impact HYD-2]

B39-32

f.

- i. There are no data or statements regarding how runoff and groundwater effects from the current design of Snowcreek V will be accounted for in retention basin design.

B39-33

- ii. There are statements or data indicating that the retention basin design will take into account changes made in Snowcreek V drainage systems to deal with the current runoff overflow problems.

B39-34

- iii. Chadmar is responsible for the inadequate design construction and maintenance of the drainage system for Snowcreek V. Chadmar must pay for the investigation design and construction to relieve the present drainage problems at Snowcreek V.

B39-35

- iv. High runoff rates will occur in years of heavy snowfall which are also periods of high groundwater.

B39-36

- v. The design for Snowcreek V did not anticipate groundwater as high as 2' bgs. Groundwater that high would invade the retention basin diminishing its water holding capacity.

B39-37

There are statements or data to indicate that groundwater invasion of the proposed been accounted for in design of the proposed retention basin?

- vi. Storm water infiltration is not feasible under conditions of groundwater this high. Chadmar must account for the storm water and general runoff conditions including those of Snowcreek V to adequately deal with these issues.

B39-38

g. The EIR states that the direction of runoff will compensate for decreased groundwater infiltration due to increase in the size of impervious surfaces.

- i. Runoff will flow downhill away from the areas with impervious surfaces and therefore cannot recharge those areas. This means that recharge will occur in different locations than occurs at present. [page I-40, Environmental Impact HYD-2]

The EIR states that these changes will not be significant but offers no proof. Chadmar needs to provide proof of this statement. There is no statement of how "not significant" is defined. "Not significant must be defined.

B39-39

2. Table 1, Mitigation Measure Section HYD-2 Groundwater Depletion or Recharge page I-40

- a. All underground structure shall be designed with exterior wall drain boards to a footing drain system as well as underslab subdrains.

This is much more extensive than was used in Snowcreek V, which is a tacit admission that the drainage systems in Snowcreek V are inadequate. These types of controls were specified for Snowcreek V, but were never enforced by the inspectors. This must be enforced and retrofitted for Snowcreek V as part of the EIR approval process.

B39-40

- b. Crawl Spaces shall be protected with proper ventilation and subdrains.

This was not done at Snowcreek V and is a tacit admission that the Snowcreek V designs are inadequate. Chadmar must bring Snowcreek V up to these same standards.

B39-41

- c. The system will be designed such that subdrain outlet systems ... have maximum water surface elevations lower than the bottom of the subdrains to insure that subdrains will not be inundated when retention basins reach capacity.

B39-42

- i. Chadmar needs to state what groundwater monitoring or measurements will be used to insure that the building subdrain outlets will be above the high groundwater levels.

- ii. In some locations in Snowcreek V the groundwater surface daylights and groundwater flows out of the ground.

Chadmar's redesigned drainage system must adequately deal with this.

B39-43

iii. The lower portion of Fairway 1 in Snowcreek V has overflowed when the storm drain system has filled. This demonstrates that the Snowcreek V drainage system is not adequate for runoff. Chadmar must correct this before construction and design of Snowcreek VIII drainage system can be adequately designed to meet the demands it will face.

B39-44

iv. High rates of runoff are going to occur during periods of high groundwater. The EIR states that groundwater can be as high as 2' bgs and the excess water will be disposed of by infiltration in drainage basins. This information shows that there may be as little as 2' of soil above the groundwater to accommodate the large mass of runoff water.

B39-45

Chadmar must show how this will be accomplished.

v. Subdrain design shall be based on final project design and shall be adequately sized so that retention basin capacity is maintained for stormwater retention purposes.

B39-46

The drainage system will be confined to an area as thin as two feet above the groundwater surface (vadose zone). The drainage system will carry water lower in the drainage basin where the vadose zone is likely to be smaller further reducing retention basin capacity. Chadmar must prove the retention basins will have adequate capacity.

1. In order to increase the volume of the retention basins in limited vertical space the basins must cover larger surface areas. This will leave less space for housing units decreasing the profitability of the project.
 - a. During the development of the earlier phases of Snowcreek there were three ponds to function as retention basins. These ponds disappeared during the design process and were replaced with housing units. In a letter dated October 16, 1989 Triad Engineering asked Dempsey Construction what was going to be done to replace this lost capacity. The documentation provided to the Snowcreek V Homeowners Association (HOA) provides no proof that question was ever answered. The current EIR process must ensure this doesn't happen again.

3. [Mitigation Measure HYD-4 Drainage System Capacity page I-42] Routine maintenance includes cleaning of grates, drain pipes, maintenance of outlet

B39-47

facilities and retention basins. Related costs should be included in the HOA operating expenses and reserves.

B39-47
(cont'd)

This was not done in Snowcreek V. How does Chadmar propose to correct for this omission? Will Triad provide topographic maps of the meadow?

4. There is an error in Table III-I page III-3, which states that there were 144 units in Snowcreek V-2 completed in 1997 when there were 146 units.

B39-48

5. The General NPDES Permit requires dischargers to:

- a. Eliminate or reduce non-storm water discharges to storm sewer system and other waters of the nation [page VI.G-9];

B39-49

Is this required for Snowcreek V?. If so Chadmar must meet these requirements prior to building Snowcreek VIII.

- b. Perform inspections of storm water pollution prevention measures (control practices, page IV.G-10).

We have no record that this was done for Snowcreek V although the SWPPP for Snowcreek V Phases 11-14 dated March 1999 stated it would be done. Chadmar must provide maintenance procedures and bring the storm drainage facilities into compliance with the general permit.

B39-50

6. The town will develop a snow removal and storage plan (page IV.H-28).

Is this also required for Snowcreek V? This must consider snowmelt runoff and infiltration effects on groundwater elevations.

B39-51

7. Wisely manage natural and historic drainage patterns. (page IV.H-61).
.....However, the project would incorporate measures as described by the Lahontan Regional Board during and after construction to manage runoff from the project site.

- a. **This is what Chadmar (Dempsey Construction) said for Snowcreek V but it wasn't done. For example in a letter dated October 16, 1989 Triad Engineering asked Dempsey Construction what was going to be done to replace this lost storm water retention and infiltration capacity when three ponds were eliminated to increase the number of housing units. The documentation provided to the HOA provided no proof that question was ever answered or dealt with. The current EIR process must ensure that Chadmar corrects that short coming.**

B39-52

8. Snow management (page IV.H-64) All development shall provide and maintain adequate on-site snow storage or maintain a Town-approved snow hauling program.

This was not done for Snowcreek V and is a tacit admission that that what was done at Snowcreek V was not adequate. Chadmar must correct this short coming before Snowcreek VIII construction begins.

- a. The management of snow at the Project site would be the sole responsibility of the Snowcreek property owners or their designated representative association.

This was stated for Snowcreek V, but the homeowners association states that they were never notified of this. If Chadmar disputes this can Chadmar produce any documentation proving that they notified the Home Owners Association of these conditions.

9. Impact PS-9 Snow Removal Services (Page IV.K-18). Management of snow on the project site is the sole responsibility of Snowcreek property owners.

The Snowcreek VIII property owners must be required to maintain access to Snowcreek V at all times.

10. In the past 30-years below average precipitation has occurred in 50% of those years. In 30% of those years, seasons with less than 70% of average occurred. Greatest water use occurs in the summer due to landscape irrigation. Surface water availability is affected by precipitation more than anything else. [page IV.N-14]

This indicates that the greatest need for irrigation will occur during the driest years when water is in the shortest supply. More people will increase the impacts of drought. Chadmar must provide Snowcreek V capacity to meet these conditions in light of increasing future demand for Snowcreek V before construction of Snowcreek VIII is allowed to begin.

[Technical Appendices Volume: Appendix B Response to the NOP and EIR Scoping Meeting Comments Received Section (Page 7 of that section) Comments from Ted Stern on behalf of Snowcreek V Fairway Homes II Owners Association Board

- a. Determine groundwater management requirements of Mammoth Meadows to include both Snowcreek V & VIII and suggests that corrections to surface and subsurface groundwater deficiencies in Snowcreek V and the meadow be a prerequisite for further development.

- b. **Determine requirements for snow storage within the proposed development to accommodate needs of Snowcreek V.**
- c. **Determine requirements for maintenance and storage space within Snowcreek VII to accommodate needs of Snowcreek V.**

B39-57
(cont'd)

11. The foremost method of avoidance and minimized impact to watersheds from urban development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions thereby managing runoff as close to the source as possible. [Appendix B Page 3 of a letter dated December 4, 2006 from the Regional Board to the Town of Mammoth Lakes Community Development Comments on NOP of EIR for proposed 2006 Revised Snowcreek Master Plan]

B39-58

- i. **The infiltration design must contain enough volume to accommodate high runoff volumes during periods of high groundwater.**
- ii. **If the infiltration basins cannot contain enough water to accommodate runoff what acceptable alternatives must be provided.**

12. Preliminary Geotechnical Investigation (Appendix F).

B39-59

- i. Not reviewed.

13. Preliminary Drainage study, Snowcreek VIII Mammoth Lakes, Mono County, California. [Technical Appendices Volume: Appendix G]

i. Section 1 – Project [page 1]

B39-60

- 1. The modified golf course is not anticipated to require major recontouring. Off-site runoff is also included from Snowcreek VI & VII plus many other developed and undeveloped areas.

a. **Why doesn't this include Snowcreek V?**

ii. Section 2 – Observations [page 2]

B39-61

- 1. Run off from large storms reaches Mammoth Creek.

a. **Are there water quality management requirements such as sampling and monitoring required because of the release to Mammoth Creek?**

b. **If so Chadmar must pay the cost.**

c. **Does Chadmar plan on turning responsibility for this program over to home owners, and if so, when?**

iii. The storm water runoff was calculated using the Town of Mammoth Lakes Design Manual 1984 "Procedure A." [page 3]

B39-62

- 1. The manual was written by Triad Engineering and Brown & Caldwell.

iv. Section 4 – Design Methods and Assumptions [page 3]

B39-63

The on-site conveyance systems are designed to convey a storm of 20-year intensity as designed by the 1984 Design manual. This is not adequate as shown by the statement in the second paragraph of section 5 [page 4] that the off-site conveyance systems will be designed for a 100-year storm:

- a. The 1981 EIR did not address off-site drainage issues.
 - i. However in Appendix A of the 1981 EIR the Kleinfelder report "Preliminary Investigation of the South Meadows Area, Snowcreek Development, Mammoth Lakes, California, dated September 30, 1980 contains the following:
 - 1. The Hydrology section recommends dealing with the 3 sources of water, sheet flow on the ground surface, seepage from the irrigation ditches, and groundwater from sands 2 to 7' below the surface. Their ideas are appropriate initial thoughts on the situation in the Snowcreek development area.
 - 2. All of these issues off-site drainage issues affect the Snowcreek V site and none were dealt with by Chadmar. These omissions must be corrected by Chadmar before construction of Snowcreek VIII can begin.
 - ii. The statement that 100-year storm is tacit admission that Snowcreek V protections from off-site drain was not adequate.
 - ii. Chadmar must correct these issues in Snowcreek V before construction of Snowcreek VII can begin.
- v. The initial conclusion is that perforated pipe is not recommended as the primary drainage conveyance because it could increase groundwater and have a negative effect on building foundations. The recommendations could be revised [page 4].
 - 1. Chadmar needs to define what would cause perforated pipe to be used.

B39-63
(cont'd)

B39-64

2. The HOA has no information indicating if perforated pipe was used in Snowcreek V. If it was used in Snowcreek V this is tacit admission that the system used for Snowcreek V was inadequate.

a. Chadmar must correct this inadequate design if it exists before construction begins on Snowcreek VIII.

B39-64
(cont'd)

vi. Section 5 – Off Site Drainage Tributary to Residential / Commercial Site [page 4]

The conveyance system will be designed for a storm of 100-year intensity.

1. This is tacit admission that the 20-year storm supposedly used in Snowcreek V is inadequate design criteria.
2. Off-site drainage issues were not dealt with at all in the 1981 EIR.
3. Chadmar must correct these inadequate designs in Snowcreek V before construction begins on Snowcreek VIII.

B39-65

vii. The retention basins [page 5]

1. The retention basins must be designed with sufficient capacity for the 100-year storms runoff from Snowcreek V at a minimum. This will still likely be inadequate as calculations show runoff from off site sources onto Snowcreek V could exceed 50 million cubic feet of water a year.
 - a. What criteria would be used to justify retention basins that did not have this capacity.
 - b. Selection of a 100-year storm capacity is tacit admission that the 20-year storm used in Snowcreek V is inadequate design criteria.
 - i. This inadequate design for Snowcreek V must be repaired by Chadmar before the construction of Snowcreek VIII begins.?
 - ii. Who will decide the final size of the retention basins And what criteria will be used for selection of final size of the retention basin?

B39-66

2. Section 6-On site Drainage within the Residential / Commercial Site (page 5)

The retention basins must be designed for shallow groundwater up to within 2 feet bgs?

B39-67

- a. If this criteria creates retention basins that are too large to be feasible, what alternatives will be used?

B39-67
(cont'd)

3. Section 7 – Retention / Infiltration System for Residential / Commercial Site (page 5)

- a. Snowcreek V is not included in the list of surrounding sites included in the capacity calculations. How can the calculations be considered valid if runoff from Snowcreek V is not included?
 - i. Will Snowcreek V be included in the capacity of the retention basins?
 - ii. If not why not?
- b. Retention basins must be designed for shallow groundwater up to within 2 feet bgs?
- c. If these criteria creates retention basins that are too large to be feasibly what alternatives will be used.

B39-68

4. Section 8 – Golf Course Expansion (page 6)

- a. Portions of the golf course expansion are at elevations higher than Snowcreek V. What ensures that drainage from the golf course expansion will not drain onto Snowcreek V?

B39-69

5. Section 9 – Sub-drainage (page 7)

- a. All facilities including underground structures, parking garages, basements, under slabs and crawl spaces shall be protected from snow pack melt and seasonal high groundwater.
- b. This was not done for Snowcreek V.
 - i. Chadmar must pay for correcting these problems at Snowcreek V.
- c. Sub drains will be designed with outlet systems that have maximum water surface elevations lower than the bottom elevations of the subdrains to insure that subdrains cannot be inundated by the outlet systems.

B39-70

i. Will this design ensure that constant drainage will occur when groundwater is 2 feet bgs?

1. If not why not?

2. If not what will ensure that drainage continues when runoff rates and groundwater levels are both high simultaneously which will frequently be the case during high snow fall years?

B39-70
(cont'd)

6. Section 10 – Summary & Conclusion (page 8)

a. Collection and conveyance systems shall have capacity for 100-year storms for off-site tributary areas and 20-year storms for on-site tributary areas.

b. There were no mitigation measures taken for off-site runoff on entering the Snowcreek V site. Chadmar must pay for correcting this before construction of Snowcreek VIII proceeds.

B39-71

Jen Daugherty

From: Wilma Wheeler [wilma.bryce@verizon.net]
Sent: Monday, October 22, 2007 4:00 PM
To: Jen Daugherty
Subject: Snowcreek VIII, Snowcreek Master Plan Update - 2007 Project Draft EIR

Dear Jen Daugherty, Please accept my comments on the subject Draft EIR. Thank you. B40-1

October 22, 2007

Town of Mammoth Lakes, Community Development Department
 Attn: Jen Daugherty

Subject: Snowcreek VIII, Snowcreek Master Plan Update - 2007 Project Draft Environmental Impact Report (Draft EIR)

I believe the project draft EIR is not adequate for many reasons.
 This proposed development is huge and will have a significant effort on the Town of Mammoth Lakes if it goes forth. It has many unsubstantiated statements regarding water supply, stating that increased permanent population (approximately 11,460 people) is less than significant, etc. A fairly recent California state law states that any development of projected population over 500 must have evidence of a sufficient water supply. That requirement is not met in this Draft EIR. A population increase of 11,460 permanent resident is significantly more than present population. How could more than doubling the current population not significantly affect the town and the surrounding public lands? B40-2
B40-3
B40-4

The proposed building height of 120 feet for the hotel is grossly out of character for this town and will adversely affect the view shed and observing the night sky. The Draft EIR failed to analyze this. B40-5

There is a land covenant on 94 acres of land proposed for the second nine holes of Snowcreek golf course. Is the proposed Outfitters Cabin an allowed use under the covenant? There was also an agreement that the golf course would limit the use of pesticides and fertilizers. Does the developer plan to abide by the negotiated agreement, which stated that no residences can be built on that land or retail businesses not directly associated with the golf course, is allowed? The land acquired from the Forest Service in a land exchange is to remain open space by the terms of the covenant. B40-6
B40-7
B40-8

It also seems that the Draft EIR counts the 94 acres of the land covered by a covenant in calculating the density in the Land Use and Planning section. Those acres can't be included in the density calculations. B40-9

This is just a small sample of the inadequacies of the Draft Environment Impact Report for Snowcreek VIII. B40

The Draft EIR should be withdrawn; the deficiencies corrected and a new Draft EIR submitted for public review. -10

Sincerely

Wilma Wheeler
 P.O. Box 3208
 Mammoth Lakes, CA 93546
 760 934-3764

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.488 / Virus Database: 269.15.5/1085 - Release Date: 10/22/2007 10:35 AM

Thomas A. Heller
PO Box 1765
Mammoth Lakes, CA 93546

Ms. Jen Daugherty
Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, CA 93546

Re: Snowcreek Master Plan Comment

Page III-11 Project Description: The Sherwin Bowl (Snowcreek) Ski Area was a large component of the original Snowcreek Village concept. Included in the original project description was the expansion of the golf course to an 18 hole feature, so that should not be used in this document as a substitute recreational amenity. The Village was going to provide the bed base for both recreational features in the original plan. Without the 6-8,000 SAOT that the ski area was to provide, the winter recreation numbers are off kilter and the need for the Snowcreek Village to buildout to its full numbers is somewhat in question.

B41-1

Thank you,

/s/ Thomas A. Heller

Thomas A. Heller

**Planning Commission Meeting
October 10, 2007**

Jen Daugherty: Um, thank you, um chair and commissioners. The Snowcreek VIII project as you know is being processed by the Town as its own code amendment is an update to the existing, um Snowcreek Master Plan. It is located on the southeast portion of town, um south of Old Mammoth Road and Minaret intersection. The project consists of 850 residential units, a 400 room hotel, and an 18-hole golf course. Currently the project is being reviewed in accordance with the California Environmental Quality Act, and currently a Draft Environmental Impact Report, has been prepared and is available for public review. The public review period started on September 6th and ends at 5 PM on October 22. Um as [unintelligible] already said the purpose of this meeting is to allow for verbal comment on the Draft Environmental Impact Report to be made in a public forum. Comments today will be treated as formal comments and will be responded to in the Final EIR. Comments on the Draft EIR may also be submitted to the Town via mail, fax or email prior to 5 PM on the 22nd. Um it is important to note that the planning commission will not be taking any action on this item today and at this time I would like to introduce Rob Carnachan from Christopher A. Joseph & Associates, the firm that has been responsible for preparing the Draft EIR.

Rob Carnachan: Thanks Jen. The purpose of the meeting today as Jen indicated is to for the Town to receive oral comments on the Draft EIR. During the course of the meeting today it is not [unintelligible] to respond to the comments but rather to receive them, hear them...we will in the process of preparing the Final EIR be preparing responses to comments, corrections and additions to the Draft EIR. Um, what I'd briefly like to do before we open the comment um, session, is summarize the findings of the Draft EIR. The Draft EIR evaluated the Snowcreek VIII, Snowcreek Master Plan Update – 2007 project with respect to a series of environmental issue categories, um, within the Draft EIR mitigation measures were proposed to reduce the level of impact associated with the proposed project to a less than significant level for all of the environmental issue areas that were evaluated with the exception of three different areas- Aesthetics, Air Quality, and Utilities, we were not able to identify mitigation measures to reduce the project's impacts to a less than significant level. Specifically those areas are associated with PM10 emissions during construction, a temporary unavoidable impact, as well as the project's impacts with regard to public views and scenic vistas, visual character and design, light and glare, and consistency with Town- adopted town policies. The Draft EIR also evaluates four alternatives to the proposed project, and provides a comparison to the impacts associated with each of those alternatives to those associated with the proposed project. Those alternatives are: a no project alternative, which in this case is not a no-build project, it is rather buildout under the existing 1981 Master Plan. In addition to that, there is a revised site plan alternative, a reduced density alternative, and an increased density alternative. With that, and we do have um, around the room here we have um, some boards to illustrate the visual simulations that are included in the Draft EIR, these are the exact same simulations that are in the document, and they illustrate how the project would be visible from different locations around town, around the project site, and in the broader, um, broader area. So with that, I think we are ready to open up the comment period to receive comments. Again, if there are some clarifications requested about the process or about the EIR we're happy to address those, um but otherwise, we prefer not to respond to comments at this point...that will be done as part of the Final EIR process after all the comments, written and oral, are received by the town. We will be working to address the comments and incorporate any additional analysis in the Final EIR, as well as make any necessary corrections to the Final EIR.

Man1: With that I'm just going to go ahead and open the [unintelligible] to the audience first...does anybody have- yes please, David please come up and just state your name and give us your comments.

Man2: And the address.

Man1: And the address.

Lauren Hipp for Homeowners' Association for Snowcreek V, Fairway Homes II:
[Comments submitted in letter form. Verbal comments excluded]

John Walter 240 Mammoth Hills Drive: I'm curious of where the district planning on this. This is a big project, we know it's been in the works a long time before the General Plan, but it would seem to me that this one cries out. Almost all this district is on one person's land, it's still part of the Town and it should be part of the district planning process. There should be lots input [unintelligible] And things like that going on, what the Town really wants in this area, the public of the Town, not just staff and applicant cooking up what they think is best for the Town. [Remainder of verbal comments submitted in letter form and have therefore been excluded]

TS-1

Nancy Peterson Walter: I'm Nancy Peterson Walter, 240 Mammoth Hills Drive. I have just two pages of comments on the cultural resources study that Burton and Farrel did, um I will have a much longer number of pages for the written comment time, but I did a quick look over the material that they wrote, and while I found the document well-organized, it's lacking in current or recent ethnographic material...no mention of talking with any of the Indians in the area, granted most of the work done in the eastern sierra is done by anthropologists with a background in archaeology. There is work that has been done by ethnographers who have written material on the area as well as other scientists who've worked with the local Paiute and Shoshone, including but not limited to people that started writing material in 1912. I have a whole series of articles that were written in the twenties when Katherine Fowler at UNR and I wrote about harvesting Pandora moss? With the Owens Valley Paiute, in '81, we had no problem finding scientific resources that were done in the Mammoth Lakes area, yet there is no mention of any of this in the EIR, and is standard in EIRs I reviewed for Emily in Ventura County years ago. There's material referenced in the handbook of American Indians, Great Basin Indians Volume 11 about the eastern sierra and ethnographers who do continuing research are referenced. Dissertations have been ranked- written about the hunting of the longhorn antelope, which used to be prevalent in the area, the relocation of the local Paiute and Shoshone to their current reservations...there's been linguistic work done, research has been done on the location of plant resources, a large percentage of which are in this area. There's been at least one master's thesis dealing with historic photographs...none of this material was referenced. Also, the fact that no mention of talking with anyone in the communities who are still living in the eastern sierra, those in Bridgeport, [unintelligible], Benton, Bishop, Big Pine, Independence or Lone Pine. Or those who grew up or whose ancestors lived in June Lake or Mammoth Lakes. I know people who work in Mammoth, who grew up in June Pine, who are Paiute. Many of these people still find food resources and material for things like basketry just as their ancestors did in this same area. The most important site of cultural significance in the report is Mono 3, a village site recorded over fifty years ago by Nelson Leonard, this site is referenced as large and significant, with great potential for subsurface material as well as buried historic material, and despite what has happened across the road to the north, the specific area relevant to this report is still true. We have no idea for this large village site where the burials are, and all that needs to happen is to find two burials, and we have a cemetery, and all the plan in the EIR becomes moot, because all work stopping has to happen. And there should have been times when work stoppage should have

TS-2

happened with material to the north, but did not. The report mentions that the area with dense historic cultural deposits and midden soils should be preserved, capped, or subject to data recovery if construction proceeds in the area as proposed. I cannot stress this point more strongly. Data recovery is the least important, since no excavation preserves for the future the cultural material that is present. There should be enough data available from preliminary survey, that more excavation should not be necessary. The discussions of vegetation, fauna and paleoclimate are well done, but as mentioned earlier, cultural context is incomplete. The pre-history is well-covered, ethnography is not up to date, other than what used to be what we referred to as “the ethnographic present” what was seen at first contact. That is what was given. Um, when reviewing cultural resource reports for Los Angeles and Ventura counties, I often found that 20- to 30-meter intervals for transects was not sufficient for areas that were a dense area of cultural materials, visible on the surface. And on page 18, they mention they did the cultural portion. They mentioned they did 20- to 30-meter intervals. That is a large distance, and you cannot physically cover 20 to 30 meters in your eyesight to see what’s on the ground, and I found that was woefully inadequate. I was shocked that the report found there was no data recovery for the area you mentioned on page 20, when the two ornamental ponds and construction of the rental office was done. This was an area of known cultural significance, yet no mention of monitoring, no mention of test pits in the area that Leonard in ’74 had recommended as a reserve- a preserve, as well as an area that Burton and Ferrel indicate that there are still substantial prehistoric and possibly historic culture material. If work did not follow recommended procedure in the past, how can we be assured it will in the future? And this is a topic I really view as extremely important. I do not feel the summary of environmental impact and mitigation measures is adequate. We now have our General Plan, but enforcement of it could still be questionable. In the report there’s still some room for value judgments, and while scientific data is still open to interpretation, it is important that mitigation measures be followed and enforced. Our past record here in Mammoth Lakes has not always had the necessary follow-through that’s important. There was supposed to be monitoring done with the site north of Old Mammoth Road, and I have driven past that several times a week...I find utility connections going in, and monitors are not there. It’s an area with a tremendous amount of resources. There were no monitors there, just construction crew. At one point, when archeology was being done, I stopped and asked the crew where the monitors were, and they said oh, all those lazy people, they don’t really know how to dig. They did not know they were talking to someone who has done work in this field. I did not bother to tell them. It’s rather upsetting to find out artifacts were taken home by workers via an overheard conversation at a Lee Vining football game, even if it may or may not be true. This is unconscionable. To have the town referenced in this manner. There’s a definite need for contractors, staff, planning commission, and location workers to be made aware of the laws that apply to cultural resources. Taking artifacts can be a felony, and yet, talking about it at a football game, whether true or not, is a very serious matter. I would strongly stress the need for workshops on this issue, to avoid problems before they happen, not after. Commissioner Barrett and I proposed in the nineties, to the town council, a- the establishment of a commission to look into historic and cultural resources. The town council turned us down. It would have prevented something like this from occurring. It should be clear that mitigation measures must apply to all the project area, including the golf course, and other auxiliary facilities, such as the store, interpretive center, and outfitter buildings. Monitors must be hired to oversee all intrusions into the earth, and have the power to stop work if necessary. What anthropologists see as a feature may not look like a construction worker’s- what they see, or what a worker boss sees or what a developer sees. There are times when a project this important may require consultation with other anthropologists who work in the area, who are familiar with the various types of habitation, variety of sites, differences in work areas, as well as material that may be obsidian, that may be Queen Bodi or Casa Diablo sources, and in talking with several people throughout the state, throughout the last couple of weeks, this site is still eligible for the National Register of Historic Places, which would make

TS-2
(cont’d)

TS-3

TS-4

TS-5

construction in or near it a moot point. I feel that the EIR needs to address several issues it has not addressed and also that the Town in its planning, needs to consider the fact that there are resources available to it that will help. We don't have to have the Paiute finding out indirectly that material has been found and or hauled off. We don't need as professional people construction workers telling us that we don't know, we don't understand, and I really resent that.

TS-5
(cont'd)

John Wentworth for Mammoth Lakes Trails and Public Access: [Comments submitted in letter form. Verbal comments excluded]

Bruce [unintelligible]: Bruce [unintelligible], um, one, um, I don't feel that this project, this area, falls under the district plan requirements. This district, it's one single plan, and if it's the district, we have one guy building it...I think the district plan is set up for, probably to make the whole area work together...that's the point of, one [unintelligible], one project, is to make it all work together. I think that there's some, some earlier comments that I don't think are, are necessarily correct, in my opinion. Um, one is that the um, the construction workers I don't think are the low-paid people that everyone thinks they are. I think that the service industry people who will work at the hotels... the Hispanic population certainly makes a lot less money than construction workers do in this town. So, bringing more construction workers to town is not putting a hardship on the town, there's income in the town to pay off those people. And I also think that housing the construction workers, I think there are a number of landlords in town at this time who would gladly have 200, 300 additional people because they're, right now, and this is a condition now, and it may change in the future, but right now, that's...our occupancies are extremely low on projects that in the past have housed construction workers. So, but I guess my- the most important thing is the district planning issue. I think that it's important in all the areas where you have owners, different pieces of property, and it's necessary to pull them together to make that area work together, and I don't think that that's the case.

TS-6

TS-7

TS-8

TS-9

Man 1: Thank you Bruce. Anybody else? Gordon.

Gordon Alper for Mammoth Community Water District: Gordon Alper, speaking as director of the Mammoth Community Water District, um I've heard comments today about water supply and as no one comes to our meetings and no one's aware of the fact that the water district is committed to supplying the water necessary for what is approved to be built in the community of buildout...we're comfortable that we're going to be able to provide that. We have taken the Dry Creek project off of our projects because we feel we can't supply the community with the needed water without it. We do have a reclaimed water project which we have approved and will be building next summer which we'll be supplying Sierra Star's water needs and we'll take them off of our roll system, and Chadmar has also committed to it, although we haven't finalized the agreement, to using reclaimed water for the golf course as well. These are supplies of well water which will no longer have to be provided to golf courses and will come from the Laurel Ponds which we have set up some time ago. We're presently modeling the underground aquifer system of the basin here, and we have a strong feeling that that will provide all of the water that we need in this community of buildout, and as a contingency we are presently doing some exploration in Dry Creek and we feel that in cooperation with Mammoth Mountain, we will be able to supply some water from that source, should we need it. We actually...the water district would be responding right to the EIR but seeing that your water supply referred to so often that, I would just uh, make the public a little more aware of what the water district is doing. Thanks.

TS-10

Man1: Gordon thank you for your information and maybe the water district should communicate more often with us, with that type of information. No I appreciate it.

Elizabeth [last name not given]: Thank you everyone again for comments, there were a few things that, in my reading of it, I hadn't focused on as well as you had, so thank you all [unintelligible] reading some [unintelligible] sections, um...my biggest concern is that it doesn't really seem to connect to the rest of the community, it looks like it's cutting Snowcreek V off. Um, I don't see, and unfortunately the EIR didn't have the depth to show me where the trails of the people staying there are going to get into the Forest Service access, or even where the trails of [unintelligible] etcetera are. That's a real concern that um, I had on it. I am also extremely concerned about the purpose of the market and interpretive center and the parking lot that covers three or four times the area of the two small buildings, and whether or not that cannot be somehow incorporated into the project, which then also makes it more forced into the community and Cesar Mammoth Creek corridor that we just said all through our general plan should be safe. I can't really, from my perspective as a person, as a resident, see why they would even put anything on that side.

TS-11

TS-12

TS-13

Man2: You're speaking as a private citizen-

Elizabeth: Yes.

Man2: I just think that's important to get on the record. I just think it needed to be on the record.

Man1: I think so.

Elizabeth: Okay. Oh, and the address is 22, 2112 Meridian [unintelligible] Number 22.

Man3: If I could, your comments should be focused on the environmental impacts, if you have not covered an issue that wasn't addressed...

Elizabeth: No, mine was the environmental impact on Mammoth Creek.

Elizabeth Tenney: Well, the more comments I hear the more I think I don't understand EIRs...Elizabeth Tenney, 217 Alexander Lane, I have not had a chance to study both these documents in detail, but I did study in detail the summary of environmental impacts and mitigation measures, and I'm a little troubled by some of the assumptions and omissions, starting out with Aesthetics, um, when it talks about this project, which is being built in an open meadow, so, obviously you know, we can't hide it in the forest, but it said no mitigation measures are available. Well, I would point to the Newler House, on the bluffs that we worked so hard on to get that mitigated so its minimal impacts were minimized to the point that you really don't see it until you look for it. And I didn't understand why the flat statement "no mitigation measures are available" was made, when, you could, by changing the site plan, or architectural design, build a mass in form, you would be able to mitigate that to an extent, even though it is an open field. For the same- that would be page 17, I'm gonna go through the summary here...for the same reasons on page 19, it talks about light and glare and says there's just going to be a lot of light and glare. Well our outdoor lighting ordinance says there should be no glare, which is defined as light shining in the eyes, and I'm not- even though yes, there will be, it won't be a dark meadow anymore and there will be people living there, um...I still think that to assume that that's just an avoidable impact we have to live with is an incorrect assumption. Same thing at 111. Significant and unavoidable changes in visual character...are we defining visual character not in terms of how we value it being good or bad, or defining visual character as being an open meadow versus a housing development...um I was unclear on that one. The thing on page 112, it doesn't talk about vehicle miles traveled during construction...and I wonder if there's a way to require that that be reduced or mitigated for the construction workers. I have personal experience with this

TS-14

because the construction workers working on the multiple projects at the bluffs come tearing down Old Mammoth Road every lunch time and tearing back up and that's usually about the time of day when I'm going for a walk and so...just construction traffic you know when you have people taking a break and going to lunch and whatever aside from the traffic involved in actual construction...I wonder if that could be mitigated. Um, on page one-I don't know how I jumped...oh it also talks about how 166, under transportation, it talks about the worst impact would be the grading construction, and uh I wonder why that assumption is made because I think that they'll be other impacts as well. On page 114, AQ5, it talks about odors and saying they're unavoidable...we have to have odors because we're going to be spraying all these buildings and these injurious chemicals and there is no discussion in here about using any kind of green products and low volatility paints and other finishes that have been proven to be just as effective as the ones that are so toxic, um, and I wonder why there was no recognition of that. On page 114, AQ5, I've got to refer to it to read it...there's a sentence I don't understand which... and when you read something that is that unclear, it makes you lose faith in the whole...not in the whole document, that's extreme, I don't mean to say that but I was troubled by this sentence where it talks about the cumulative impact. It's the second paragraph from the bottom on page 114...I know Bill Taylor talked when we last talked about air quality and even if nobody lived here we still would have air quality that didn't meet the state standards because of what blows over the pass, but what they're talking about here with cumulative impacts either doesn't understand that or is saying something completely different but it's not understandable. Um, under birds on page 119, it talks about having a buffer from nesting zones, and yet one of the letters of comment suggested that all the areas where birds might nest be cut down, it was afraid that we weren't doing adequate protection for our wildlife...on page 123 the plant list that we're using as a guideline...is not one of the county's pla-it's incidentally one of the county's plant lists adopted formally by the town of Mammoth Lakes. On page 141, why aren't best management practices listed as mitigation measures, um, that's not specified. On page 146 is another sentence I couldn't comprehend. It said they'll be no construction activities on days that residents are most sensitive to exterior noise. I have no idea what that means. 152, they talk about how the project is going to result in a meaningful increase in crime, and for that one I went to the technical appendices and looked at what Police Chief Shienle had written, and he talks about the crime problems and they said that just having some security personnel are going to take care of that but they- I didn't think that it accurately acknowledged Chief Schienle's concerns. Page 156 there's an assumption about no more parks and recreation required that I didn't think was valid...157, I question under "Rec-1" who determines that the project's recreational facilities are adequate? Just that assumption is made- who determines or did determine that? Same thing with Rec-3, assumptions about access to the Sherwins. Who decides that those access points have been enhanced or that they're adequate? Transit on page 160, yeah, there's also a determination that it will operate at a success- satisfactory level of service. I didn't see the material that backed that up. 168, there was nothing- it was just traditional irrigation, the windiest spot in town, here today...exceptional...talking about using conventional sprinkler systems, nothing about drip or sub-surface irrigation, and then on page III-43 it talks about preserving the existing tree cover and except for the ones that have been planted I don't know what trees are out there. So that's all I've had a chance to look at so far but those assumptions and omissions were troubling to me. Thank you.

TS-15

TS-16

TS-17

TS-18

TS-19

TS-20

TS-21

TS-22

Man1: Okay. Anything else?

