



United
States
Department
of
Agriculture

Forest
Service



Environmental Assessment

Shady Rest

Over Snow Vehicle/Off Highway Vehicle Staging Area Project

*USDA Forest Service, Inyo National Forest
Mammoth Ranger District*

*Mono County, California
December 2013*

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Chapter 1.0 Purpose and Need for Action

1.1 Introduction

The USDA Forest Service, Inyo National Forest has prepared this Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA). This EA discloses the direct, indirect, and cumulative environmental impacts that would result from the modified proposed action and alternatives. Additional documentation, including more detailed analyses of the project-area resources referenced in this document can be found in the Project Planning Recorded located at the Forest Service Supervisors Office in Bishop, CA.

The project is located in the Shady Rest Area approximately one mile north of Mammoth Lakes along Sawmill Cut-Off Road within the Mammoth Creek and Hot Creek Watersheds. The nearest community is the Town of Mammoth Lakes (TOML), which is approximately one mile south of the project area in Mono County, CA. This area is allocated as a Concentrated Recreation Area in the Inyo National Forest Land and Resource Management Plan (1988) and receives high use year round by both motorized and non-motorized recreationists. The Forest Service has been working with the public for many years on how to resolve issues between motorized and non-motorized recreation in this area, as well as more generally manage the high use that this area receives, being easily accessible and immediately adjacent to the TOML. Currently there are no developed staging facilities dedicated for over snow vehicle (OSV) or off-highway vehicle (OHV) use near the TOML. Within the larger Shady Rest area is a developed municipal park that is under special use permit with the TOML. This park was first permitted to Mono County in 1966, and the park improvements were acquired by TOML in the early 1980s when TOML was first incorporated. Winter recreation opportunities are offered in and around TOML and can be found in the Mammoth Lakes Winter Recreation Map (see Appendix C).

Prior to 2009, Over snow vehicle (OSV) users were permitted to stage at the entrance to the New Shady Rest Campground, which does not operate as a campground during the winter months. The Sawmill Cutoff Road was not plowed past the entrance to the campground, and this road was groomed for both motorized and non-motorized use, and provided access to a larger system of groomed OSV trails. In the winter of 2009-2010, a change was made in plowing for winter access to geothermal wells that exist in the Shady Rest Area. Previously, these wells were accessed by plowing the Sawmill Road from near US 395 to the wells, just east of the Shady Rest Park. This involved plowing approximately 2 miles of native surface road, and was causing road damage and erosion problems. Additionally, more geothermal wells are proposed further west of Shady Rest Park, and access to these wells would disrupt the use of Sawmill Cutoff Road as a groomed OSV trail. Therefore, to alleviate problems associated with extensive plowing of native surface roads, and to experiment with how to manage OSV and non-motorized winter recreation in relation to likely changes winter access to geothermal wells, the geothermal company was directed to access their wells via Sawmill Cutoff Road, and through the Shady Rest Park. When winter plowing of Sawmill Cut-Off Rd disrupted the groomed OSV access to the trail system and open area, the OSV staging was moved to Shady Rest Park. For summer OHV use, no formalized staging area exists near the Shady Rest Park, so OHV riders use either the park, or informal turnouts along the Sawmill Cutoff Road to the north of Shady Rest Park. Some concerns the Forest Service has received about the motorized recreationists staging at Shady Rest Park include increased motorized traffic and noise within Shady Rest Park, and insufficient staging area development for current OSV/OHV use, as well as concerns from

TOML about damage to park infrastructure.

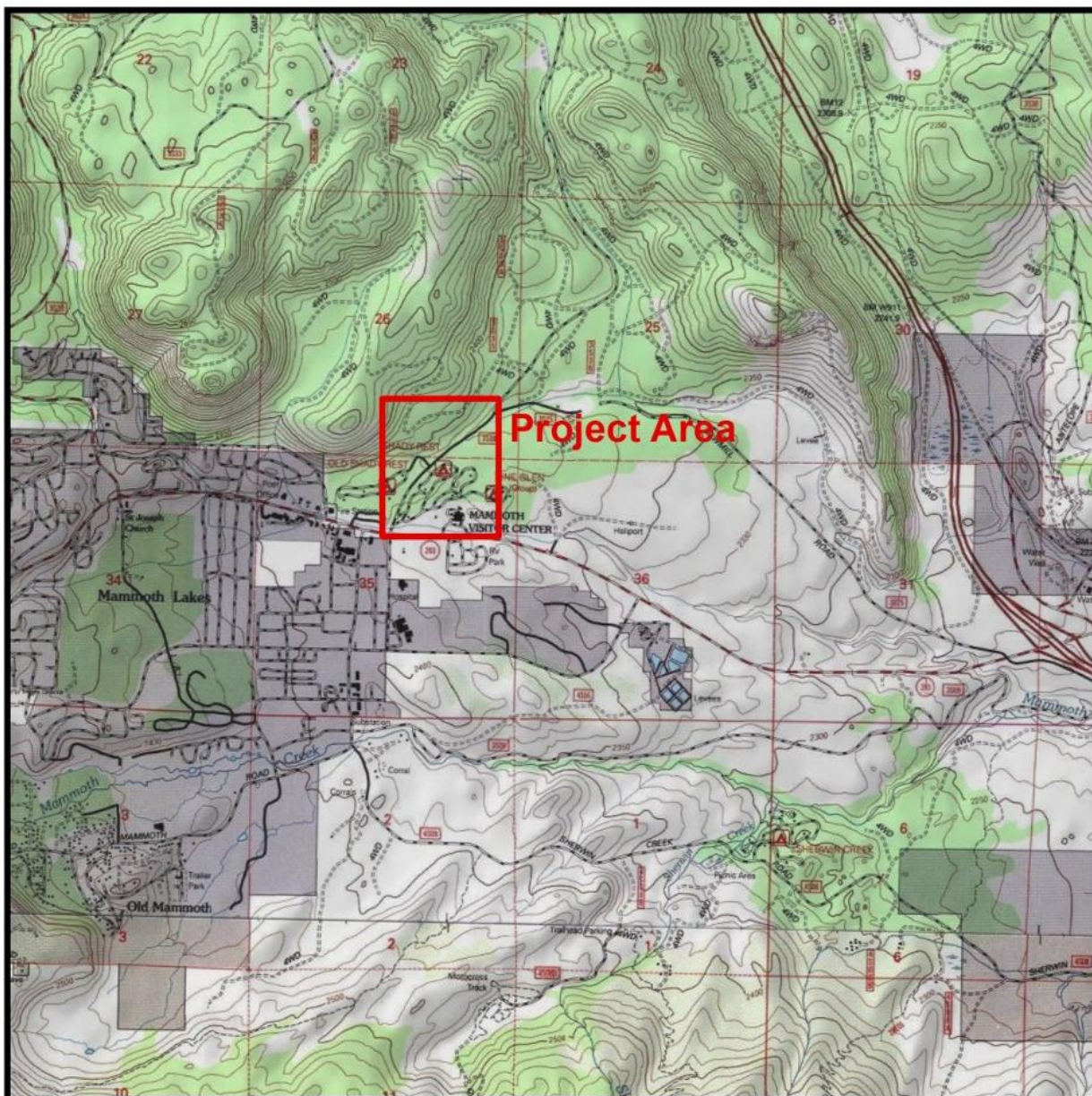
The Forest Service recognizes there are diverse recreation needs and desires for the Shady Rest area. Therefore the Mammoth Ranger District is proposing to develop the OSV/OHV Staging Area to provide reasonable opportunities for motorized recreation in a manner that reduces conflicts with other uses in the area and has prepared the following Environmental Assessment.

United States Department of Agriculture
Forest Service

Inyo National Forest

Shady Rest OSV/OHV Staging Area Project

July 2013



1.2 Purpose and Need

The purpose of the Shady Rest Over-Snow Vehicle (OSV)/ Off-Highway Vehicle (OHV) Staging Area Project is to provide safe, adequate, and well developed and diverse recreation opportunities within the Concentrated Recreation Area.

Currently, there are no developed staging facilities for OSV/OHV use in the vicinity of Shady Rest Area. Prior to 2009, the OSV community staged at the entrance to the Shady Rest Campground until administrative access and use required winter plowing of Sawmill Cut-Off Road, disrupting the groomed OSV access to the trail system and open riding area. At that time, the permitted OSV staging was relocated to Shady Rest Park, concentrating motorized vehicle staging within a limited footprint, increasing traffic and noise levels reducing the quality of outdoor recreational experience for other visitors. Similarly, the lack of a designated staging area for summer OHV use contributes to conflicts with other uses during summer as well.

The underlying *need* for taking action at this time is:

- Provide for adequate OSV/OHV staging near the Town of Mammoth Lakes
Indicator: Distance of the proposed staging area from Highway 203.
- Separate motorized and non-motorized uses to ensure public safety and minimize noise disturbances.
Indicators: Distance of motorized recreation from the OSV restricted area and between the staging area and the non-motorized designated area.
- Protect cultural resources from being damaged by motorized vehicle use at user-created staging areas.
Indicator: Potential effects to cultural resources.
- Reduce use conflicts with infrastructure development to sustain quality recreational amenities and visitor experience.
Indicator: Distance of the staging area from the open riding area.
- Minimize effects to air, soil, and water quality from motorized vehicle and non-motorized visitor use.
Indicators: Soil and Water Quality – amount of ground disturbance measured in length (feet) of road reconstruction for winter motorized use; Air Quality – amount of PM10 emissions.
- Minimize effects to threatened and endangered species and Forest Service Sensitive Species.
Indicator: Potential effect to TE&S species.

1.2 Decision to be Made

This Environmental Assessment (EA) is not a decision document under the National Environmental Policy Act. Its main purpose is to disclose and allow public comment on the consequences that could result from no action, the proposed action or alternatives to the proposed action.

The District Ranger for the Mammoth and Mono Lake Ranger Districts is the Responsible Official who will decide whether or not to authorize implementation of the proposed action or one of the alternatives considered in detail.

Should the Proposed Action be selected, certain decisions will be documented in a forthcoming Decision Notice (DN). Accordingly, the Shady Rest OSV/OHV Staging Area Project EA focuses on providing analysis sufficient to ultimately make the following Federal decisions:

- What staging areas, trail and road improvements will the Forest Service authorize, and under what conditions?
- What mitigation and monitoring measures will be required if the proposed action is selected?

1.3 Public Involvement

Public scoping was initiated on January 30, 2013. A project description and scoping documents were also made available at the project website (<http://www.fs.fed.us/nepa/fs-usda-pop.php/?project=38834>). A letter inviting comment was also sent to the local tribes on January 30, 2013. A list of tribes consulted is located in Chapter 4. The Forest Service hosted public meetings on February 10, 2011, February 17, 2011 and September 27, 2011. A total of 11 individuals or organizations commented on the proposed action during the scoping period.

In summary, there was some support for this project and some concerns about mixing motorized and non-motorized use within the Shady Rest area. Some concerns received by the non-motorized user group included the need to maintain clean and quiet recreation, the safety concerns of non-motorized users recreating near motorized users, increased traffic within Shady Rest Park, and safety concerns with sharing a groomed trail with OSV users. Some concerns received by the motorized user group included the need for developed facilities for ease and safety of OSV/OHV on-loading and off-loading, difficulty navigating through Shady Rest Park congestion, and insufficient parking and turnarounds for large vehicles and trailers.

1.4.1 Issues

An issue, as it relates to the NEPA process, is a point of disagreement, debate, or dispute with the proposed action based on some anticipated effect. The following issues were identified during scoping.

- 1) Moving the staging area far from town could hinder access to amenities.
- 2) Common use of motorized and non-motorized on the paved trail may increase safety risk to visitors.
- 3) This project could cause effects to air, soil and water quality.
- 4) This project could cause effects to clean and quiet recreation.
- 5) This project could affect wildlife.
- 6) Safety concerns related to widening of Sawmill Cut-Off Road.

The Forest Service received several comments that were ultimately identified as non-issues, or outside the scope of the project. A list of these comments is documented in the project file at the

Supervisors Office in Bishop, CA.

1.5 Tiering and Incorporation by Reference

In order to eliminate repetitive discussion and documentation, this environmental assessment tiers to the analysis of the Inyo National Forest Land and Resource Management Plan (USDA Forest Service 1988) as amended by the Sierra Nevada Forest Plan Amendment (USDA Forest Service 2004). The following documents prepared for this analysis are incorporated by reference:

- 1 Biological Evaluation for Shady rest OSV/OHV Staging Area Project (wildlife) (R. Perloff, 2013)
- 2 Wildlife Management Indicator Species Report (R. Perloff, 2013)
- 3 Biological Evaluation for Sensitive Plants for Shady rest OSV/OHV Staging Area Project (S. Weis, 2013)
- 4 Noxious Weed Risk Assessment (S.Weis, 2013)
- 5 Cultural Report (R. Foxworth, 2013)
- 6 Recreation Specialist Report (J. Kazmierski, 2013)
- 7 Visual Analysis Report (K. Rich, 2013)
- 8 Hydrology, Soils and Air Quality Report (E. Noesser, 2013)
- 9 Decision Memo. Inyo National Forest Over Snow Vehicle Trail Grooming. (INF, 2012)

Chapter 2.0 Alternatives

2.1 Alternative 1: No Action

Under this alternative, the staging area would remain at its current location at Shady Rest Park.

2.2 Design Features common to Alternatives 2 &3

The site proposed for developing a staging area under alternatives 2 and 3 is located within the Goshawk PAC. In order to reduce the potential for impacts to goshawks, the staging area is proposed to be located within an existing fuel break that lies adjacent and parallel to the Sawmill Cutoff Road, as the fuel break is not preferred nesting habitat for goshawks. Therefore, construction would not entail new reductions in forest canopy cover within goshawk nesting habitat.

Geothermal pipelines exist within the Shady Rest area, and new pipelines are likely in the future with additional expansion of geothermal energy development. The Forest Service coordinated with the Casa Diablo IV Geothermal Development Project proposal to move planned pipelines and provide underground crossings at locations necessary for continued access to the open riding area where pipelines must cross roads and OSV routes. OSV users traveling outside the groomed access trail to the open snow area may be exposed to pipelines that will act as barriers with no access beyond. In order to mitigate this, the Forest Service is proposing a staging area near the edge of geothermal development with pipeline crossings and groomed access beyond the pipelines to open riding areas. Also, sections of the pipeline route not located next to existing roads will be monitored for evidence of use by OHV's. If such evidence is found, ORMAT (the geothermal operator) will notify the USFS and comply with its requirements for funding or

implementation of actions to prevent use by OHV's, such as the posting of signs and the physical blocking of access (FEIS, 2013)

Mitigation and protection measures for these alternatives include; monitoring ground disturbing activities, accumulation of sufficient snow over archaeological deposits or historic features to prevent surface and subsurface impacts (RPA, Appendix E 2.1 (b)), and the snow cover must have 12 inches depth of compacted snow or ice (RPA, Appendix E 2.1 (b) (1)), placement of foreign, nonarchaeological material (e.g. padding or filter cloth) over archaeological deposits to prevent surface and subsurface impacts (RPA, Appendix E 2.1 (c)), installation of physical barriers and protection devices within boundaries of historic properties (RPA, Appendix E 2.1 (d) (1)) and adoption or implementation of use controls (e.g. signage; RPA, Appendix E 2.2 (c) (1) (B)).

The widening of Sawmill Cut-Off Road would be designed to meet the safety standards of its intended use. Also, Proper speed limit signs and safety warnings will be posted at the staging area, along Sawmill Cut-Off Road, and along the trail to ensure the safety of the users. This area will also be patrolled by Forest Service law enforcement to ensure compliance.

2.3 Alternative 2: Modified Proposed Action – Staging Area Development

The modified proposed action would authorize the design and construction of an OSV/OHV staging area along Sawmill Cut-Off Road in the Shady Rest Area. The development can be described in four components, 1) Staging area development, 2) widening of Sawmill Cut-Off Road, 3) a ride-back trail and 4) a snowmobile parking area.

1) Staging Area Development

The staging area would be a two acre paved parking area adjacent to Sawmill Cut-Off Rd (Forest Road 3S08) in T3S, R27E, Section 25 (MDB&M). The parking area would accommodate approximately twenty-five vehicles with nose in, pull through, and parallel parking with curbs and sidewalks. The staging area would be able to accommodate both large and small vehicles such as RV's with trailers to pickup trucks. The site would be plowed during the winter and authorize winter only RV overnight use. Onsite amenities would include a restroom, several educational kiosks, picnic area, and a loading ramp for summer OHV use.

2) Widening of Sawmill Cut-Off Road

Less than one half mile of Sawmill Cut-Off Road would be widened and paved from where the pavement ends at the Shady Rest Park turn-off to the proposed staging area. This section of roadway is currently dirt/aggregate. The road would be an overall paved width of 24 feet consisting of two 12 foot lanes, with 2 foot shoulders and a 10 foot buffer on either side of the road. The total potential ground disturbance would be approximately 50 wide which include the paved roadway, shoulders, drainage structures, cut and fill slopes, and any localized clearing needed to accommodate roadside safety.

3) Ride-back Trail

The ride-back trail is a winter OSV authorized route only. The trail would be approximately 1.1 miles offering access from the staging area south to Highway 203, and back north to the trail system. For descriptive purposes the trail is separated into three parts, southern, middle and northern. The southern portion of trail would start at the 4) snowmobile parking area (described below) and coincide with the existing paved non-

motorized route until approximately 100 – 200 yards past 03S122 (administrative road closed to public motorized use). Under this modified proposed action winter only OSV use would be authorized on the southern section of trail. The middle portion of trail would fork off the paved trail, past the 03S122, and parallel east of Sawmill Cut-Off Road to the staging area. This was modified from the original proposed action and the amount of trail the OSV would share with non-motorized was reduced to mitigate safety concerns of the public associated with motorized and non-motorized users sharing the same trail. The 0.8 miles of trail preparation would consist of removing enough trees and brush to accommodate the groomer width and laying down mulch to protect the groomer from large rocks. There would be no ground disturbance for this level of trail preparation. The northern section of trail would be the same type of trail preparation described above. It would be 0.3 miles of trail that connects the staging area to the existing trail system on the west side of Sawmill Cut-Off Road.

One ORMAT geothermal pipeline crosses Sawmill Cut-Off road just before the staging area. This would intersect with the ride-back trail. ORMAT's proposing to underground the section of geothermal pipeline at this location (this action is under the Casa Diablo 4 EIS). This "pipeline crossing" would be wide enough to accommodate both the roadway and the ride-back trail. This would allow safe OSV access past the geothermal pipeline.

There would also be "snowmobile crossings" where the ride-back trail crosses paved roadway. These "snowmobile crossings" are a rubbery substance painted on the surface of the road to protect both the snowmobile and the paved road.

4) Snowmobile Parking Area

The snowmobile parking area would be a turnout along Sawmill Cut-Off Road at the entrance to New Shady Rest Campground and be approximately 1,000 square feet in size. The parking area would accommodate multiple snowmobiles and provide a location to lock OSV's so visitors can access town amenities. This parking area would be developed on existing paved areas so there would be no ground disturbance involved.

2.4 Alternative 3: Staging Area Development minus Ride-Back Trail & OSV Parking

Alternative 3 would be the same as the modified proposed action described above minus the 3) ride-back trail and the 4) snowmobile parking area.

Mitigation and protection measures for this alternative include; monitoring ground disturbing activities, placement of foreign, non-archaeological material (e.g. padding or filter cloth) over archaeological deposits to prevent surface and subsurface impacts (RPA, Appendix E 2.1 (c)), installation of physical barriers and protection devices within boundaries of historic properties (RPA, Appendix E 2.1 (d) (1)) and adoption or implementation of use controls (e.g. signage; RPA, Appendix E 2.2 (c) (1) (B)).

2.5 Alternative 4: New Shady Rest Campground Entrance

Alternative 4 would provide a winter OSV staging area at the New Shady Rest Campground entrance. It would be located on an existing paved parking area and accommodate approximately thirty or more vehicles with nose in and pull-through parking. A restroom currently exists at this location and would be open for year round use. The 2) widening of sawmill cut-off road and the 4) snowmobile parking area would not be included in this alternative. Although, the 3) ride-back

trail described under the modified proposed action would be included in this alternative to allow OSV access to the trail system. There would be no ground disturbance under this alternative.

The mitigation and protection measures would be the same as described under alternative 2.

Figure 1. Modified Proposed Action Map

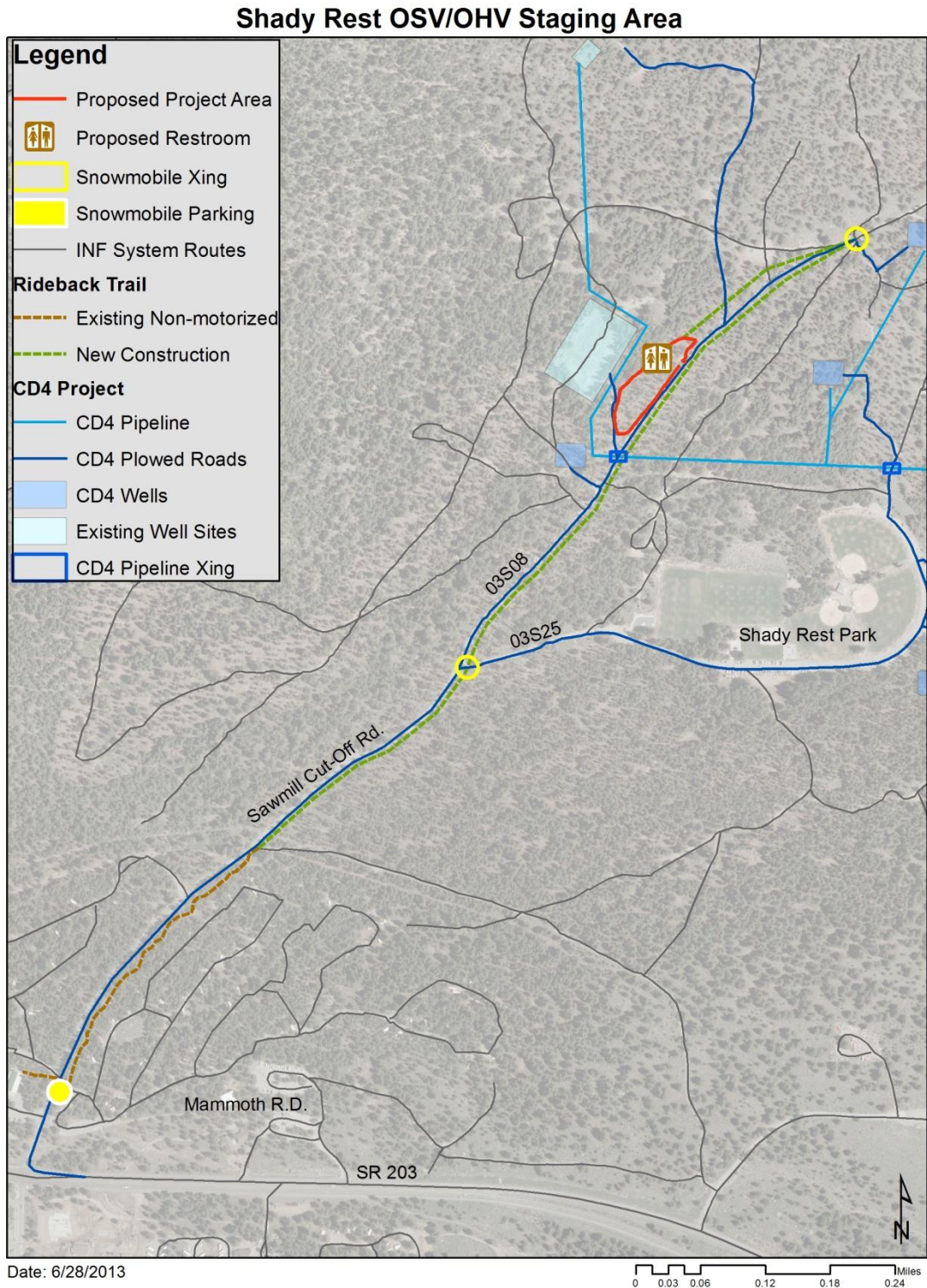


Table 1. Comparison Table of Potential Effects by; Alternative, Purpose and Need, Issue and Indicator.

The following table provides a comparison of the alternatives: the action that each alternative takes, whether or not the alternative meets the purpose and need, and the effect on issues identified during scoping.

	Alternative 1: No Action	Alternative 2: Modified Proposed Action (MPA)	Alternative 3: MPA minus Ride-back trail and OSV parking area.	Alternative 4: New Shady Rest Parking Area
Purpose and Need				
Does the alternative meet the purpose and need describe in section 1.2?	No. Alt 1 would not separate motorized and non-motorized users and conflicts between the users would continue. The Shady Rest Park does not provide sufficient space for the current OHV use in the area. Users would continue to cause resource damage by staging at several pull-outs along main forest roads and within multiple recreation sites. Current development of geothermal energy adjacent to the Shady Rest area would conflict with OHV and OSV users groups as construction of new roads and pipelines continues and the interruption of existing routes and winter access to well sites creates barriers to	Yes, Alt. 2 would consolidate user groups and reduce conflicts between motorized and non-motorized user groups and mitigate conflicts between recreationist and geothermal development. There are safety concerns with mixed user groups utilizing the ride-back trail. Constructed facilities would reduce resource damage.	Yes, Alt. 2 would consolidate user groups and reduce conflicts between motorized and non-motorized user groups and mitigate conflicts between recreationists and geothermal development. This alternative does not include the ride-back trail therefore there are no associated safety concerns. Constructed facilities would reduce resource damage.	No. Alt 3 would separate winter recreation users and provide for winter access to the trail system. This alternative would not address summer OHV recreation needs in the Shady Rest Area. Pull-outs along main forest roads and within multiple recreation sites would continue to cause resource damage during summer use. Conflicts between motorized and non-motorized would continue on and around the ride-back trail. Under this alternative the ride-back trail would get the most use as all winter motorists would have to travel the ride-back trail to access the open riding areas.

	Alternative 1: No Action	Alternative 2: Modified Proposed Action (MPA)	Alternative 3: MPA minus Ride-back trail and OSV parking area.	Alternative 4: New Shady Rest Parking Area
	the trail system.			
Issues:				
1. Provide an OSV/OHV staging area near the Town of Mammoth Lakes. <u>Indicator:</u> Distance the proposed staging area is from Highway 203.	This location is approximately 1 mile from HWY 203.	This alternative would be approximately 1 mile from HWY 203 but provides for a ride-back trail for winter OSV to access amenities.	This alternative would be approximately 1 mile from HWY 203. People will have to get supplies prior to parking at the staging area. Restrooms and information kiosks will be available at the staging area.	This alternative is located adjacent to HWY 203 and has direct access to town amenities and public transportation.
2. Common use of motorized and non-motorized on the paved trail may increase safety risk to visitors. <u>Indicator:</u> Number of feet the paved path will be authorized for winter motorized use.	This alternative does not authorize motorized use on the non-motorized trail.	Approximately 1800 feet of paved trail will be authorized for OSV motorized use.	This alternative does not authorize motorized use on the non-motorized trail.	Approximately 1800 feet of paved trail will be authorized for OSV motorized use.
3. This project could cause effects to air, soil and water	No ground disturbance and approximately 6.4 pounds PM10 emissions.	Approximately 3.8 acres of ground disturbance and 6.4 pounds/per day of PM10 emissions from staging area	Approximately 3.8 acres of ground disturbance and 6.4 pounds/per day of PM10 emissions from	No ground disturbance and approximately 6.4 pounds/per day PM10 emissions and 1.5 pounds

	Alternative 1: No Action	Alternative 2: Modified Proposed Action (MPA)	Alternative 3: MPA minus Ride-back trail and OSV parking area.	Alternative 4: New Shady Rest Parking Area
quality. <u>Indicator:</u> Ground disturbance & PM10 Emissions		use and 70 pounds total PM10 emissions from construction.	staging area use and 70 pounds total PM10 emissions from construction.	PM10 emissions from re- painting existing parking area.
4. This project could cause effects to clean and quiet recreation. <u>Indicator:</u> Distance of staging area from non- motorized designated area.	The staging area would remain within Shady Rest Park. Approximately 0-300 feet from OSV restricted area.	Proposed location for staging area is located approximately 1,200 feet from OSV restricted area. Ride-back trail would be located within a small corridor adjacent to OSV restricted area for approximately 3,000 feet.	Proposed location for staging area is located approximately 1200 feet from OSV restricted area.	The staging area would be adjacent to the OSV restricted area. Ride-back trail would be located within a small corridor adjacent to OSV restricted area for approximately 3,000 feet.
5. This project could affect wildlife. <u>Indicator:</u> Potential effect to TE&S species.	No changes would be made under this alternative therefore there would be no impacts associated with wildlife.	This alternative would not affect any threatened or endangered species or their habitats and may impact northern goshawk individuals, but would not result in a trend towards federal listing or loss of viability in the planning area (see section 3.1.3.)	This alternative would not affect any threatened or endangered species or their habitats and may impact northern goshawk individuals, but would not result in a trend towards federal listing or loss of viability in the planning area (see section 3.1.3.)	This alternative would not affect any threatened or endangered species or their habitats and may impact northern goshawk individuals, but would not result in a trend towards federal listing or loss of viability in the planning area (see section 3.1.3.)
6. Safety concerns related to widening of Sawmill Cut-Off Road.	No changes would be made under this alternative therefore there would be no impacts to safety associated with widening the road.	Approximately 5,200 feet of (<1 mile) of paving will be constructed.	Approximately 5,200 feet of (<1 mile) of paving will be constructed.	The road would not be widened under this alternative therefore there would be no impacts to safety associated with

	Alternative 1: No Action	Alternative 2: Modified Proposed Action (MPA)	Alternative 3: MPA minus Ride-back trail and OSV parking area.	Alternative 4: New Shady Rest Parking Area
<u>Indicator:</u> Distance of paving being constructed.				widening the road.

Chapter 3.0 Environmental Consequences

3.1 Effects to Hydrology, Soils, and Air Quality

A Hydrology, Soil and Air Quality Report (Noesser, 2013) is summarized here and included in the project file. The project area is within two watersheds: the Mammoth creek Watershed and the Hot Creek Watershed. Because there are no water bodies within 300 feet of any portion of the project, there are no potential effects to water quality.

No Action

The No Action alternative would retain the existing staging area and grooming patterns. The OSV staging area would remain in the Shady Rest Park, and grooming would continue to connect Shady Rest Park to the OSV system in the winter. OHVs would likely continue to stage in dispersed user created areas.

Direct and Indirect Effects

Soil Quality

Analysis Area: Effects to soils generally occur immediately below or adjacent to the area of disturbance.

Soil Standards

Soil Compaction (loss of porosity): The No Action alternative should continue current levels and area of soil compaction, though there could be some slight increase in the long-term. The current staging area at Shady Rest Park is partially on pavement and partially on native surface adjacent to the pavement. This native surface area would be used for parking during the summer whether or not it was also used as an OSV staging area in the winter. Therefore, the staging area itself does not contribute to soil compaction.

Currently, OHV users do not have a designated staging area in the Shady Rest area. Therefore, they have created their own staging areas or used dispersed areas. Over time, these dispersed areas may grow, or more may be created, because there is no convenient designated staging area. Therefore, the area and severity of compaction may gradually increase over time.

Soil Cover, Erosion and Displacement: The staging area at Shady Rest Park is partially on pavement and partially on native surface road. As stated above, the native surface area, as well as the paved area, would be used for parking in summer whether or not there was an OSV staging area at the site. Therefore, the OSV staging area does not contribute to soil cover reduction, erosion, or soil displacement.

However, the dispersed and user-created OHV staging areas that have been created have reduced soil cover and caused some displacement of the surface layer of soil. Little erosion of OHV roads or parking areas has been noted in the area, except those native surface roads that are plowed in the winter to access the geothermal plant facilities. That erosion is not associated with OHV use. Over time, these dispersed areas could grow and reduce soil cover over a larger area. The effect will be minor, local, and should not lead to any changes in soil quality on a watershed-wide scale.

Under the No Action alternative, there is potential for small amounts of oils, fuels, or other contaminants to spill onto the staging area due to leaks in vehicles or spills during fueling. The contaminants could enter the soil in the current staging area at Shady Rest Park, either directly or indirectly after running off the paved parking. This area is also used for a parking lot during the summer by passenger vehicles. It is likely that small leaks occur year-round, and the use as a staging area likely contributes a very small amount to the overall soil contamination. No tests have been completed to record levels of hydrocarbons or other contaminants in the soil at this site, and there is no data showing whether the use as a parking lot and OSV staging area has affected soil chemistry. There is no evidence of large-scale contamination, such as stained-looking soils or a smell of fuel at the site, so we assume that there has been no major soil contamination.

Air Quality

Analysis area: The analysis address effects to air quality within the Town of Mammoth air quality Planning Area (approximately 4.6 square miles or 2,500 acres)

Air quality will be analyzed mainly in terms of effects to PM-10 and ozone, because those are the two pollutants for which the area is either in Federal or State non-attainment. The No action alternative would have very minor effects to air quality. The existing staging area can hold up to 8 vehicles, each carrying an average of two snowmobiles. Therefore, the maximum number of snowmobiles leaving the staging area at any one time would be 16. We assume the average ride is four hours, so we estimate that the maximum number of snowmobiles in one day would be 32 on a peak day. This level of use is likely unusual, and may only occur a few days of year on a holiday weekend with recent snow. If the Shady Rest staging area did not exist, the OSV users would likely stage in another area of the Forest. Therefore, the staging area does not necessarily increase OSV use, but it allows it to occur in the Shady Rest area.

Snowmobiles emit various compounds considered to be pollutants. Most snowmobiles have two stroke engines, which have higher emissions of most pollutants than cars or four stroke engines. According to the US Department of the Interior (USDI 2000), the average 16 hp snowmobile emits about 20 pounds of hydrocarbons per four hours of usage. The same 'average' snowmobile emits 0.2 pounds of PM10 per trip and 0.06 pounds of nitrates, an ozone precursor. Therefore, if 32 snowmobiles left the area in one day, and rode for 4 hours each, the total PM10 emissions would be 6.4 pounds, and the total nitrate emissions would be 1.92 pounds. For comparison, the total PM10 emissions from woodburning in the Mammoth Lakes area on a peak day were estimated to be 1,874 pounds/day (GBUAPCD 2013). This alternative's estimate of 6.4 pounds/day is too small to affect PM10 non-attainment.

For ozone, OSVs do not emit ozone, but emit ozone precursors, and their conversion to ozone depends on many factors, most prominently solar radiation. Therefore, it is difficult to predict ozone additions from OSVs. Because ozone is produced mainly in summer when solar radiation is higher, it is not considered to be affected by snowmobile use in the winter.

There is less than one mile of grooming to connect the staging area to the OSV trail system. Snow grooming equipment itself has very low emissions, similar to a passenger car. Under California State Standards, the INF's snowcat (280 horsepower Piston Bully 200) is required to have a maximum of 2.3 grams NOx per horsepower per hour of use, and 0.03 grams PM per

horsepower per hour of use. Given that the snowcat would drive about 1 hours per day to groom the Shady Rest area (one to a few days per week), and is 280 horsepower, the emissions per day could be up to 0.03 grams PM-10 and 2.3 grams NOx. Considering that total PM emissions per day from all sources in Mammoth are about 7,539 pounds, estimated emissions from the Shady Rest grooming is inconsequential. Total NOx emissions for the Mammoth Lakes area are unknown, but for comparison, a passenger vehicle meeting the current California Ultra Low Emissions Vehicle Standard would emit about the same amount as a day of use for the snowcat when driven 45 miles (California EPA Air Resources Board, accessed at <http://www.arb.ca.gov/msprog/levprog/leviii/attach2.pdf>).

Cumulative Effects

The cumulative effects analysis area (CEAA) is different for Hydrology, Soils and Air Quality therefore a discussion of the analysis area is included for each resource area. Within the CEAA, cumulative effects are analyzed on the accumulation of past, present and reasonably foreseeable future actions, including the existence and use of groomed snowmobile trails and staging areas, and any future predictable disturbances or activities that would occur within the next 10 years.

In order to understand the contribution of past actions to the cumulative effects of the proposed action and alternatives, this analysis relies on current environmental conditions as a proxy for the impacts of past actions. This is because existing conditions reflect the aggregate impact of all prior human actions and natural events that have affected the environment and might contribute to cumulative effects.

The Forest Service has identified three additional potential staging areas; one adjacent to Highway 395, a second along the Mammoth Scenic Loop Road and a third immediately south of the developed portion of Mammoth Lakes adjacent to Sherwin Creek Road. The staging area adjacent to Hwy 395 has been used for many years, although the Forest Service has considered upgrading the facilities. These upgrades are currently only conceptual, as are any plans for the other two staging areas. Also any changes to the existing staging area, or development of the other two may or may not be considered reasonably foreseeable within the next 10 years. If constructed, the staging areas would be similar in size to the one analyzed in this document.

Hydrology

Cumulative watershed effects (CWE) were analyzed for the Hot Creek and Mammoth Creek Watersheds because these are the watersheds in which the vast majority of OSV use occurs. The Equivalent Roaded Area (ERA) method was used (methods in Appendix B), which considered the disturbance due to roads, past timber sales, fires, and recreational development such as parking lots, trails and campgrounds.

The No Action ERA in the Mammoth Creek Watershed was calculated to be 5.03%. With a threshold of concern of 16-18%, the watershed is at less than 30% of its Threshold of Concern. We estimated that the Hot Creek Watershed has an ERA of 8.50% currently. With a Threshold of Concern of 16-18%, this is about half of the Threshold of Concern.

In summary, the proposed action causes almost no increase in cumulative watershed effects and therefore will not affect watershed hydrology.

Soils

Cumulative effects for soils include effects that generally occur immediately below or adjacent to the areas of disturbance. The indicators of soil health (Soil compaction, soil cover, displacement and erosion) have only minor, local negative impacts under the No Action Alternative. There is some reduction of soil productivity where people have created dispersed staging areas. The Shady Rest area contains a park, roads, past and proposed new fuel reduction projects, campgrounds, and trails. While all of these impact soil productivity over a relatively small footprint, the majority of the area remains in near natural soil condition, with little compaction, very little erosion, and natural vegetative cover. Therefore, the cumulative effects will not lead to major changes in indicators of soil health on a watershed scale.

Air Quality

Cumulative effects are analyzed at the Town of Mammoth Lakes air quality planning area scale (approximately 4.6 square miles or 2,500 acres). Because the project would have only local, temporary, minor effects to air quality, there would be no cumulative effect that would lead to any measurable overall increase in air quality. This project would not contribute to the non-attainment status for ozone or PM-10 for the Mammoth Lakes area.

Alternative 2: Direct and Indirect Effects

Soil Standards

Soil Compaction (loss of porosity): This project would permanently compact about 3.8 acres of soil, much which will be paved. This area of soil compaction would be small enough to have no effects on hydrology or soil productivity on a watershed scale, though there will be local effects. Local effects will include permanent loss of the ability of the soil to support vegetation over most of this 3.8 acres. Because much of the area will be paved, there will be a permanent loss of productivity. Further, the area immediately adjacent to the new staging area could become more highly compacted due to the shift in use from the existing Shady Rest Park to the new staging area. That adjacent area would likely remain able to support vegetation, but compaction could reduce soil productivity.

Soil Cover, Erosion and Displacement: The project would remove soil cover over about 3.8 acres. Most of that area would be paved, and therefore would no longer be subject to any erosion. However, the pavement would make the area impervious, and therefore more runoff would leave the site, and at higher velocities than under existing conditions. While this has the potential to cause more erosion in areas surrounding the pavement, proper implementation of the design features shown above should reduce this erosion to minor, local soil loss.

This alternative would include adding about 0.14 miles of new OSV trail as part of the ride-back trail. This new trail would require no grading or ground disturbance, other than removing a few trees to allow for grooming. Therefore, it would not affect soil standards. About 1 mile of trail/road would be groomed for the ride-back trail, in areas not currently groomed. Because grooming only occurs over at least 12 inches of snow or when there is enough snow to prevent soil disturbance (Inyo National Forest 2012), the new grooming will have no effects to soil erosion.

Under Alternative 1, there is potential for small amounts of oils, fuels, or other contaminants to spill onto the staging area due to leaks in vehicles or spills during fueling. The contaminants could enter the soil in the current staging area at Shady Rest Park, either directly or indirectly after running off the paved parking. The amount of contamination would be the same as in the current staging area in Shady Rest Park, but just moved to a different site. Due to the relatively small amounts of fuels that will be on the site (ie. No large fuel storage tanks), it is unlikely that this alternative will lead to measurably contaminated soil.

Air Quality

Air quality will be analyzed mainly in terms of effects to PM10 and ozone, because those are the two pollutants for which the area is either in Federal or State non-attainment. In the long-term, the project will not affect air quality. The project will not cause an increase in OSV or OHV use. It will only move the existing staging area at Shady Rest Park to another site about 0.3 miles away. Therefore, OSV and OHV emissions will not change. Further, while grooming will occur on a new trail, it will simply replace grooming currently on a parallel road of the same distance. There will be a slight reduction in groomed distance because the area to the south and east of Shady Rest Park, the current staging area location, will no longer be groomed. Due to the low emissions of the groomer used by the Forest, this will make no measurable difference in air quality.

There will be minor, local, temporary increases in PM10 during project construction. Although equipment types and hours of use are not precisely known, we estimated that the project would take ten days, and that 5 pieces of 100 horsepower equipment would be used 8 hours a day for all 10 days. Using an emission factor of 0.8 grams of PM10/horsepower/hour for construction equipment (from the Santa Barbara APCD Form -24 3/31/97), the total project emissions from diesel combustion in this equipment would be 70 pounds, or 7 pounds per day. For comparison, the Mammoth Lakes area is in non-attainment for PM10 which is attributed to wood burning and road cinders. These both peak in the winter, while this project would occur during the summer or fall. On peak days, woodburning was estimated to be 4,054 pounds/day (GBUAPCD 1990). This project's estimate of 7 pounds/day is too small to affect PM-10 non-attainment.

For ozone, vehicles do not emit ozone, but emit ozone precursors, and their conversion to ozone depends on many factors, most prominently solar radiation. Therefore, it is difficult to predict ozone additions from construction equipment. One ozone precursor is NOx. Using an estimate of 11 grams NOx/horsepower/hour, we estimated that equipment used for the project would release roughly 970 pounds of NOx over its life, or 97 pounds/day. The County-wide estimate of NOx is approximately 986 tons per year for 2005 (Town of Mammoth Lakes 2006), or 2.7 tons per day. The estimate of 97 pounds/day is 1.8% of the 2005 estimated daily total. This project is unlikely to affect ozone non-attainment because ozone from the Central Valley is considered overwhelming relative to Central Valley inputs.

The project construction would also emit some PM-10 through adding dust to the air. This effect would be local and would settle near the construction area. If conditions created enough dust to cause visible plumes, or dust was blowing off-site, the construction site and roads would be watered to reduce any hazards.

Cumulative Effects

Hydrology

Cumulative watershed effects (CWE) were analyzed for the Hot Creek and Mammoth Creek Watersheds. The ERA method was used (methods in Appendix B), which considered the disturbance due to roads, past timber sales, fires, and recreational development such as parking lots, trails and campgrounds.

The pre-project ERA in the Mammoth Creek Watershed was calculated to be 5.03%, with the proposed action causing almost no increase, to 5.04%. With a threshold of concern of 16-18%, the watershed is at less than 30% of its Threshold of Concern. We estimated that the Hot Creek Watershed has an ERA of 8.50% currently, and the project would very slightly increase that value to 8.51%. With a Threshold of Concern of 16-18%, this is about half of the Threshold of Concern.

In summary, the proposed action causes almost no increase in cumulative watershed effects and therefore will not affect watershed hydrology.

Soils

The indicators of soil health (Soil compaction, soil cover, displacement and erosion) would be altered over almost four acres. This will reduce or eliminate soil productivity over these four acres. The Shady Rest area contains a park, roads, past and proposed new fuel reduction projects, campgrounds, and trails. While all of these impact soil productivity over a relatively small footprint, the majority of the area remains in near natural soil condition, with little compaction, very little erosion, and natural vegetative cover.

The effects of implementing this alternative, when added to the effects of past, present and reasonably foreseeable actions, are not expected to result in appreciable adverse cumulative effects to the indicators or soil health.

Air Quality

Because the project would have only local, temporary, minor effects to air quality, there would be no cumulative effect that would lead to any measurable overall increase in air quality.

The effects of implementing this alternative, when added to the effects of past, present and reasonably foreseeable actions, are not expected to contribute to the non-attainment status for ozone or PM-10 for the Mammoth Lakes area.

Alternative 3

Alternative 3 is similar to the Proposed Action, but there would be no ride-back trail groomed during the winter, and no winter OSV parking area designated in the New Shady Rest campground. Because this alternative would have no difference in the area of ground disturbance, equipment usage for construction, or number of OSV or OHV users in the long run, the effects to soil and air quality would be the same as under the Proposed Action.

Alternative 4

Alternative 4 would move the OHV/OSV staging area to the existing New Shady Rest Campground. The ride-back trail would be located in the same configuration as under the Proposed Action. No new ground disturbance would occur.

Direct and Indirect Effects

Soil Standards

Soil Compaction (loss of porosity): Alternative 4 would not cause any new ground disturbance. All activities would either occur in existing paved areas or would include only grooming over snow, which does not cause ground disturbance. Therefore, there would be no effect to soil compaction.

Soil Cover, Erosion and Displacement: The project would cause no new ground disturbance, and no change in OSV or OHV use. Therefore, there would be no effect to soil cover, erosion or displacement.

This alternative would include adding about 0.14 miles of new OSV trail as part of the ride-back trail. This new trail would require no grading or ground disturbance, other than removing a few trees to allow for grooming. Therefore, it would not affect soil standards. About 1 mile of trail/road would be groomed for the ride-back trail, in areas not currently groomed. Because grooming only occurs over at least 12 inches of snow or when there is enough snow to prevent soil disturbance (Inyo National Forest 2012), the new grooming will have no effects to soil erosion.

Contamination of the soil through leaks or spills from vehicles would be unlikely to change measurably relative to current levels. While there would be more use at the site in the winter, the small amount expected to leak or spill should not measurably affect soil chemistry.

Air Quality

Air quality will be analyzed mainly in terms of effects to PM-10 and ozone, because those are the two pollutants for which the area is either in Federal or State non-attainment. In the long-term, the project will not affect air quality. The project will not cause an increase in OSV or OHV use. It will only move the existing staging area at Shady Rest Park to the campground, about 0.5 miles away. Therefore, OSV and OHV emissions will not change. Further, while grooming will occur on a new trail, it will simply replace grooming currently on a parallel road of the same distance. There will be a slight reduction in groomed distance because the area to the south and east of Shady Rest Park, the current staging area location, will no longer be groomed. Due to the low emissions of the groomer used by the Forest, this will make no measurable difference in air quality.

There will be very minor, local, temporary increases in PM-10 during project construction. The only construction required would be re-painting the parking area in the new Shady Rest Campground. Although equipment types and hours of use are not precisely known, we estimated that the project would take two days, and that 1 piece of 100 horsepower equipment (road striper) would be used 8 hours a day for those 2 days. Using an emission factor of 0.8 grams of PM-10/horsepower/hour for construction equipment (from the Santa Barbara APCD Form -24 3/31/97), the total project emissions from diesel combustion in this equipment would be 3

pounds, or 1.5 pounds per day. This project's estimate of 1.5 pounds/day is too small to affect PM-10 non-attainment.

For ozone, vehicles do not emit ozone, but emit ozone precursors, and their conversion to ozone depends on many factors, most prominently solar radiation. Therefore, it is difficult to predict ozone additions from construction equipment. One ozone precursor is NO_x. We will use this as a proxy for estimated ozone production from the project. Using an estimate of 11 grams NO_x/horsepower/hour, we estimated that equipment used for the project would release roughly 39 pounds of NO_x over the project's life, or 18 pounds/day. The County-wide estimate of NO_x is approximately 986 tons per year for 2005 (Town of Mammoth Lakes 2006), or 2.7 tons (5,400 pounds) per day. The estimate of 18 pounds/day is 0.3% of the 2005 estimated daily total. This project is unlikely to affect ozone non-attainment because ozone from the Central Valley is considered overwhelming relative to Central Valley inputs.

The project construction would emit very little dust, because the re-painting of the parking lot would occur in a paved area. The contribution to PM-10 from that dust would be negligible.

Cumulative Effects

Hydrology

Cumulative watershed effects (CWE) were analyzed for the Hot Creek and Mammoth Creek Watersheds. The ERA method was used (methods in Appendix B), which considered the disturbance due to roads, past timber sales, fires, and recreational development such as parking lots, trails and campgrounds.

The pre-project ERA in the Mammoth Creek Watershed was calculated to be 5.03%, with the proposed action causing no increase. We estimated that the Hot Creek Watershed has an ERA of 8.50% currently, and the project would cause no change. Because the project would not change the ERA of either watershed, it would have no cumulative effect to watershed hydrology.

Soils

The indicators of soil health (Soil compaction, soil cover, displacement and erosion) would not be altered. The effects of implementing this alternative, when added to the effects of past, present and reasonably foreseeable actions, are not expected to result in appreciable adverse cumulative effects to the indicators or soil health.

Air Quality

Because the project would have almost no effect to air quality, there would be no cumulative effect that would lead to any measurable overall increase in air quality. The direct and indirect effects would be immeasurably small and therefore cannot add to any cumulative effects. The effects of implementing this alternative, when added to the effects of past, present and reasonably foreseeable actions, are not expected to contribute to the non-attainment status for ozone or PM-10 for the Mammoth Lakes area.

3.2 Effects to Wildlife

A Biological Evaluation (BE) (Perloff, 2013) for threatened, endangered, proposed, and sensitive wildlife species was prepared, and is included in the project file. This report states the project would not affect any threatened or endangered species or their habitats and may impact northern goshawk individuals, but would not result in a trend towards federal listing or loss of viability in the planning area. This finding is consistent for all four alternatives. Project implementation would have no impact on any other sensitive species. This determination is based on the following factors: 1) No threatened or endangered species are known to occur within the project area, nor is there suitable habitat present for any of these species. 2) No sensitive species other than northern goshawk are known to occur within the project area. 3) Implementation of Alternatives 2 or 3 would result in the loss of 5 acres of goshawk foraging habitat; however ample additional habitat is available in the surrounding area. 4) Despite limited disturbance associated with project implementation and subsequent use of the facilities, ample alternative habitat is available for goshawks if temporarily displaced from the immediate vicinity. 5) Neither the proposed staging area nor access trails would be located in suitable nesting habitat. (Perloff, 2013) A Management Indicator Species (MIS) Report was also prepared and is included in the project file. The report discusses project level habitat impacts to bioregional scale Mountain Quail trends and concluded that the removal of up to 5 acres of mid seral coniferous forest will not alter the existing trend in habitat, nor will it lead to a change in the distribution of mountain quail across the Sierra Nevada bioregion. Five acres represents approximately 0.00002 percent of the habitat available within the 10 national forests in the Sierra Nevada province (Perloff, 2013).

The cumulative effects analysis area (CEAA) includes lands adjacent to the groomed snowmobile trail system on the Mono Lake and Mammoth Ranger Districts as identified on the 2009 Mammoth Lakes Winter Recreation Map because this is the area for which Shady Rest OSV area provides access. This area extends generally from the Town of Mammoth Lakes north to June Lake Junction and from Mammoth Mountain Ski Area east to Bald Mountain. Within the CEAA, cumulative effects are analyzed on the accumulation of past, present and reasonably foreseeable future actions, including the existence and use of groomed snowmobile trails and staging areas, and any future predictable disturbances or activities that would occur within the next 10 years.

Northern goshawks, if present, will continue to be affected by the various forms of summer and winter recreation that occurs in the vicinity of Shady Rest Park. Recreation pressure may increase gradually as human population increases with a commensurate increase in motorized recreation. Future disturbance of goshawks is anticipated in association with the construction and operation of the CD-4 geothermal project which includes drilling up to 16 additional wells, construction of a power plant, and installation of transmission lines and geothermal pipelines. The Forest Service has identified three additional potential staging areas; one adjacent to Highway 395, a second along the Mammoth Scenic Loop Road and a third immediately south of the developed portion of Mammoth Lakes adjacent to Sherwin Creek Road. Development of all three of these additional staging areas are currently conceptual, although the one adjacent to Hwy 395 has been used for many years at a low level of development. Any further development of these areas may or may not be considered reasonably foreseeable within the next 10 years. If constructed, the staging areas would be similar in size to the one analyzed in this document however no additional impacts to northern goshawks are anticipated as no suitable habitat would be removed at any of the three sites. The Forest Service has also received a proposal for an

alternate staging area for a snowmobile rental business that generally operates at Smokey Bear Sandflat. No ground disturbance would be associated with the alternate staging area; vehicles would park on the existing paved shoulder of the Mammoth Scenic Loop Road and rental equipment and storage would be placed on top of the snow. The CD-4 project will also affect approximately 37 acres of goshawk foraging habitat. There are no other foreseeable projects in the area that area likely to impact northern goshawks or their habitat.

The Inyo National Forest grooms and maintains a network of up to 85 miles of snowmobile trails during the winter season. Grooming generally begins in late December and can last through March. The number of trips made by grooming equipment varies annually depending on the amount and frequency of precipitation. This trail system is popular with winter recreationists and snowmobile use occurs almost daily on some portion of the network. In 2002 Jones and Stokes authored a Biological Evaluation/Biological Assessment that analyzed the impacts of the Inyo National Forest's over-the-snow recreation program. The report, hereby incorporated by reference, concluded that over-the-snow recreation may be impacting individual goshawks, but would not result in a trend towards Federal listing or a loss of viability in the planning area.

Mid seral coniferous forest is well distributed in the vicinity of Shady Rest Park and the eastern Sierra Nevada in general. Removal of 23 acres (5 acres for the proposed project and 18 acres for geothermal development) of mid seral coniferous habitat would have a negligible impact on the distribution of this habitat stage in the eastern Sierra Nevada and is not expected to alter the existing trend within the planning area.

3.3 Effects to Sensitive Plants and Noxious Weeds

A Biological Evaluation (BE) (Weis, 2013) for threatened, endangered, proposed, and sensitive plants was prepared, and is included in the project file. This report states the project that there will be no effects to Forest Service sensitive species under any of the alternatives considered because there are no known populations, there were negative surveys for these species, and there is no habitat for these species at the proposed sites or the alternatives sites.

A weeds risk assessment was also prepared which determined that there are known weedy species in the project area. Mitigation measures to prevent the spread of noxious weeds would include cleaning equipment and clothing prior to beginning project along with some monitoring.

3.4 Effects to Cultural Resources

A summary Heritage Resource Report (Foxworth 2013) is described below and included in the project file. Under the No Action Alternative, the absence of developed and controlled staging areas, the use of unregulated and user created staging areas will continue. These unregulated and user created staging areas have the potential to negatively affect cultural resources by, staging within and potentially damaging cultural resources that are unknown to the recreational user. It is anticipated that, over time and space, these negative effects would increase in magnitude without management controls resulting in adverse effect to cultural resources.

Alternative 2 will have a positive effect on protecting Cultural Resources. Offering developed staging areas would deter the creation of additional user created staging areas which could be placed within archaeological sites, thus resulting in the damage of these irreplaceable resources. By establishing boundaries, concentrating and directing the flow of OHV/OSV traffic coupled

with the implementation of SRPMs and monitoring listed in Heritage Report, the proposed action will have No Adverse Effect 36 CFR §800.5(b) to cultural resources.

Alternative 3 is the same as the proposed action minus the ride-back trail. By incorporating the following SRPMs; monitoring ground disturbing activities, placement of foreign, non-archaeological material (e.g. padding or filter cloth) over archaeological deposits to prevent surface and subsurface impacts (RPA, Appendix E 2.1 (c)), installation of physical barriers and protection devices within boundaries of historic properties (RPA, Appendix E 2.1 (d) (1)) and adoption or implementation of use controls (e.g. signage; RPA, Appendix E 2.2 (c) (1) (B)), the direct, indirect and cumulative effects of alternative 1 are similar to the proposed action and therefore, would result in a finding of No Adverse Effect 36 CFR §800.5(b) to cultural resources.

Alternative 4 consists of having winter OSV staging at the New Shady Rest Campground entrance on existing paved areas and the ride-back trail to connect snowmobiles to the OSV trail system. By implementing the SRPMs and monitoring listed in Heritage Report the direct, indirect and cumulative effects of alternative 2 are similar to the proposed action and therefore, would result in a finding of No Adverse Effect 36 CFR §800.5(b) to cultural resources.

3.5 Effects to Recreation

A recreation report (Kazmierski, 2013) was prepared and is included in the project file. The “Shady Rest” area is located immediately adjacent to the Town of Mammoth Lakes and has infrastructure to support a variety of summer and winter recreation uses. Two campgrounds, a municipal park and ball fields, and 1.4 miles of paved pedestrian and bicycle paths are located within the project area. The Mammoth Ranger Station and Mammoth Lakes Visitor Center are immediately adjacent to the project area.

In the summer, the municipal park is used for picnics, sporting events, and general leisure and exercise. During the winter months since 2009, the paved parking area of the park has been plowed and used as a staging area for over snow vehicles (OSV) as well as for non-motorized users and dog walkers. Prior to 2009, OSV staging took place at the entrance to the New Shady Rest Campground and was displaced as a result of the need for winter access to geothermal wells to the east of Shady Rest Park.

Under contract with the State of California, the U.S. Forest Service grooms a network of snowmobile trails, typically operating annually between December and April. The “A” trail departs from the staging area now at Shady Rest Park and continues north where it connects to the larger groomed system. The U.S. Forest Service administrative facility that houses the snow cat used for grooming and other maintenance equipment related to the OSV program is housed at a facility west of New Shady Rest Park. The location of this facility requires the groomer and patrol snowmobiles to travel through the non-motorized portion of the campgrounds and forest to reach the snowmobile trail network. Prior to displacement of the staging area at New Shady Rest Campground, the groomer and motorized public users traveled the Sawmill Cutoff Road corridor that is designated for motorized access.

There are a total of 158 campsites in the project area that provide overnight camping opportunities for a variety of users. Campsites in this area accommodate large RV’s, tents, and there are 19 sites designated for large groups. In winter, the roads in the campgrounds are

groomed for non-motorized nordic ski, snowshoe, and walking activities. The non-motorized groomed trail system connects to the Mammoth Lakes Welcome Center and the Shady Rest Park.

Paved biking and walking trails connect the Mammoth Lakes Welcome Center, the campgrounds, and the Shady Rest Park to Town of Mammoth Lakes. A portion of the paved path is groomed in the winter for nordic activities.

In addition to the developed recreation opportunities, there also are many recreation uses taking place in and around the project area that do not rely upon the developed recreation infrastructure. Cross-country hiking and skiing, mountain biking, running, snowshoeing, and other non-motorized forms of recreation take place on a network of user created trails and throughout the general forest area. Organized biking and running events occur on several of the system and non-system routes in the area. Dispersed camping and campfires are prohibited in the project area.

Off-highway vehicle (OHV) users stage in dispersed sites throughout and around the project area. With no formal or centralized staging location, users have developed several well-used parking areas to off-load OHV's and access the system roads and trails in and around the project area. Street legal vehicles use Sawmill Cutoff Road to access the area and ride the network of roads and trails and can use the paved road system in the campgrounds to connect to Sawmill Cutoff Road and the subsequent forest system road network.

Alternative 2: Proposed Action – “Staging Area Development”

Direct and Indirect Effects

The proposed action would have several direct and indirect effects to the summer and winter recreation resources and activities in the area. None of these effects are determined to be significant.

Motorized OHV users would benefit from the establishment of a designated, hardened staging area with amenities that would enhance the user experience. Motorized users who often stage out of the Shady Rest Park may find the new facility more attractive to use and would forgo use of the Park, thus segregating park users from motorized OHV users. The described ride-back trail would not be open to motorized OHV users and would therefore have no effect on the user group. Widening of the Sawmill Cutoff Road would not change the road class. Motorized OHV users traveling Sawmill Cutoff Road would continue to be required to meet California street legal vehicle requirements.

Non-motorized summer recreation users would also benefit from the proposed action. The staging area could be used by these users, who would benefit from the amenities provided. Indirectly, motorized OHV users would stage out of a centralized area and travel fewer routes to and from the staging destination. Non-motorized users would likely encounter fewer motorized vehicles on shared portions of road between the campgrounds and the proposed staging area, as motorized use would become more concentrated.

Winter OSV users would benefit from the newly developed staging area and the proposed amenities. The design of the staging area would facilitate access for large vehicles with trailers and improve upon the less than ideal turnaround and parking conditions at the current staging

area in Shady Rest Park. Widening Sawmill Cutoff Road would improve safety along the road corridor by allowing for improved snow storage, a wider travel corridor, and improved visibility. A ride-back trail as described would facilitate OSV access to the Mammoth Lakes Welcome Center where users could interact with staff who can provide information on OSV opportunities and conditions. OSV users would also be able to park and either walk or use the public transportation system to access stores and restaurants in the Town of Mammoth Lakes.

Non-motorized winter users would realize both benefits and disadvantages from the proposed action. Moving the motorized OSV staging further north and away from the non-motorized corridor would reduce the noise impacts from OSV's staging and traveling north away from the staging area and non-motorized nordic area. The Shady Rest Park would no longer be plowed for parking (it would continue to be plowed for access to geothermal wells) and would see fewer OSV users and a likely reduction of incursions into the northeastern end of the non-motorized nordic area. The proposed motorized corridor back towards the Mammoth Welcome Center would result in additional noise impacts from OSV users accessing this trail. While not all OSV users staging at the proposed staging area would travel the corridor, many would use the route and the associated disturbances from OSV's would impact the quality of the nordic experience currently available on the western edge of New Shady Rest Campground and along a portion of the paved bike and pedestrian path. The motorized OSV corridor would also require that a short segment, approximately one quarter of a mile, of trail that is currently groomed exclusively for nordic users be shared by motorized and non-motorized users. While these user groups currently share many miles of trails throughout the Inyo National Forest, many non-motorized users have grown accustomed to no motorized use in the area and shared use along this heavily used short segment of trail would create tension among user groups. OSV users traveling faster than the posted speed limits would be a safety risk to slower-moving nordic users. Exposing motorized users to the non-motorized area may also increase the potential for incursions into the non-motorized area.

Construction of the ride-back trail would require the removal of several Lodgepole and Jeffrey pine trees that currently help screen the campground and portions of the bike path from the road corridor. Removal of these trees would reduce that screening effect and make the campsites and the path more visible.

Widening of the road corridor will also require the removal of trees along the Sawmill Cutoff Road corridor and reduce the screening effect of the campsites and bike path, although to a lesser extent than the ride-back corridor would require.

Alternative 3: Staging Area Development minus Ride-back Trail and OSV Parking

Direct and Indirect effects

Alternative 3 would have many of the same direct and indirect effects to the summer and winter recreation resources and activities in the area, minus those described as part of the ride-back trail and OSV parking, as noted below. None of these effects are determined to be significant.

Exclusion of the ride-back trail and OSV parking would eliminate the associated benefits to the OSV users and create new benefits for the non-motorized nordic users. Without a ride-back trail, noise impacts in the non-motorized area from OSV use would be reduced. Noise impacts would

be limited to the staging OSV's less than ¼ mile to the north of the northern boundary of the non-motorized area or, less commonly, to OSV's traveling off of the groomed trail system near the boundary of the non-motorized area. Noise impacts would be less than those experienced today with staging taking place immediately adjacent to the non-motorized boundary, at Shady Rest Park.

This alternative would completely segregate motorized and non-motorized users, other than those non-motorized users who elect to stage out of the motorized staging area and travel the groomed snowmobile trails. Segregation of uses would minimize user conflicts and reduce tensions between user groups. There would be no shared trail segment and no concern over OSV and nordic user safety issues, other than OSV users who travel illegally in the non-motorized area.

Alternative 4: New Shady Rest Campground Entrance

Direct and Indirect effects

Alternative 4 would change the location of the staging area to the same location that staging occurred for over 15 years before it was displaced by plowing activities. It would also require that all OSV users staging in the project area travel the motorized snowmobile corridor adjacent to the non-motorized staging area and therefore amplify many of the effects of the corridor as noted above in alternative 2. The width of the motorized corridor under Alternatives 2 and 4 is much narrower than the width of the corridor provided before 2009 when Sawmill Cutoff Road was not plowed. Pre-2009, Sawmill Cutoff Road was groomed and OSV users and non-motorized users shared a wide corridor. OSV users often traveled off of the groomed trail in attempt to keep their tracks and engines cool and to avoid nordic users, but had room to do so given the large width of the corridor. Given the geographic and infrastructure constraints, the proposed corridor is much narrower than the previously used corridor and would limit the ability of OSV's to travel off the groomed trail.

Compared to the ride-back trail proposed in alternative 2, the effects of noise, potential safety concerns as a result of illegal speeds, and conflicts and tensions between motorized and non-motorized users would increase in alternative 4 directly proportional to the increased number of OSV users traveling the ride back trail for ingress/egress to the trailhead as opposed to access to town amenities. With a greater number of OSV users traveling the corridor, it can also be anticipated that there would be an increase in the number of incursions into the non-motorized area, either as a result of direct negligence, lack of understanding of the regulations, or being lost during adverse or confusing weather conditions.

None of these effects are determined to be significant.

Cumulative Effects

Cumulative effects consider past, present and reasonably foreseeable future actions. The geographic area assessed in this analysis includes all national forest lands on the Mammoth, Mono Lake, and northern portion of the White Mountain Ranger Districts that are open to over snow vehicles, including both groomed trails and open riding areas. The Mammoth, Mono Lake, and northern end of the White Mountain Ranger Districts are the portions of the Inyo National

Forest that receive adequate snow and have terrain that is accessible and legal for over snow vehicles to operate in.

Expansion of geothermal wells and pipeline, designated as the “CD4 Project,” is a project that is currently being planned and analyzed on the Mammoth Ranger District. Recreation resources and activities affected by the CD4 project are largely being mitigated by this proposed staging area project. Underground road crossings of the geothermal pipeline will facilitate recreation use in the area and the selected locations for staging and ride-back have been selected to compliment the CD4 project.

The Forest Service has identified two additional staging areas; one adjacent to Highway 395, and a second along the Mammoth Scenic Loop Road. The area adjacent to Hwy 395 is at a low level of development, but has been used for years. Any new development of these two additional staging areas are currently conceptual and may or may not be considered reasonably foreseeable within the next 10 years. If proposed again in the future, these staging area projects would concentrate motorized recreation use and indirectly reduce impacts on non-motorized users, improve the ability of the U.S. Forest Service to communicate with users and provide information, enhance the user experience for the recreation user, and limit the expansion of existing user-created staging areas.

The U.S. Forest Service has received a proposal from the Town of Mammoth Lakes to make improvements to an area where non-motorized and motorized staging, both summer and winter, currently takes place. The proposal has not yet been accepted by the U.S. Forest Service. Resource conditions at and adjacent to the “borrow pit” along Sherwin Creek Road on the Mammoth Ranger District are currently being assessed to determine the feasibility of this project. Similar to the two additional staging areas mentioned above, this project could have many potential benefits to motorized and non-motorized user groups, as noted above. Snowmobiles currently use the area to access open riding areas along the base of the “Sherwin” Ridge; no developed or groomed snowmobile recreation opportunities currently exist in this area. The proposal submitted by the Town of Mammoth Lakes would not provide any further recreation development for snowmobile users beyond a more formal, designated parking and off-loading infrastructure. The “borrow pit” staging project would have many direct benefits to non-motorized users, as hiking, cross-country and backcountry skiing, mountain biking, and equestrian users would be the predominate uses out of this proposed staging area.

The U.S. Forest Service has not accepted any other proposals or is working on or had knowledge about any other organized activity that would be considered as a reasonable foreseeable action. There are no other similar projects or disturbance that can be reviewed in the cumulative effects analysis.

No Action

The no action alternative would maintain a staging area at Shady Rest Park and would not establish any new motorized use in the project area. Continued conflicts between motorized OSV and non-motorized nordic users would occur at Shady Rest Park. Parking and turnaround conflicts and obstacles would continue to persist. The Town of Mammoth Lakes would continue to experience damage to their park infrastructure and OSV users would continue to expose

themselves to safety risks when traveling illegally off the groomed trail and through the Shady Rest ball fields and park facilities.

Chapter 4.0 Lists

4.1 Tribes, Organizations, Agencies, and Persons Consulted

Mono County Supervisor – Fred Stump	Mammoth Community Water District
Bishop Paiute Indian Council	Mono County Supervisor – Tim Alpers
California-Nevada Snowmobile Association	The Wilderness Society
Bishop Paiute Indian Tribe – Raymond Andrews	Mono Lake Committee
Big Pine Paiute Tribe of Owens Valley	June Lake Loop Chamber of Commerce
Benton Utu Utu Gwaiti Paiute	California Native Plant Society
Mammoth Mountain Snowmobile Adventure	Sierra Forest Legacy
DJs Snowmobile Adventure	Mono County Planning Department
Mammoth Nordic	Center for Biological Diversity
Mono Lake Kutzadikaa Tribe	Town of Mammoth Lakes Tourism and Recreation
Bridgeport Paiute Indian Colony	Jim Allen’s Auto-matics
Western Watershed Project	LADWP – Dave Martin
Joe Echenique Livestock	USDI Fish and Wildlife Service
I&M Sheep Co.	Ventura Fish and Wildlife Office
Mono County Supervisor – Byng Hunt	June Lake CAC
Ventura County Motorcycle Club	Eastern Sierra Audubon Society
Forest Service Employees for Environmental Ethics	SnowLands Network
Lahontan Regional Water Quality Control Board	LADWP – Northern District Engineer
California Department of Fish and Game Bishop Field Office	Range of Light Group, Toiyabe Chapter, Sierra Club
Friends of the Inyo	THPO (Tribal Historic Preservation Officer) – Bill Helmer

*A full list of persons consulted is located in the project file located at the Supervisors Office in Bishop, CA.

4.2 List of Preparers

- Erin Noesser, Hydrologist, Inyo National Forest
- Richard Perloff, Wildlife Biologist, Inyo National Forest
- Sue Weis, Botanist, Inyo National Forest
- Bob Foxworth, District Archaeologist, Inyo National Forest
- Katy Rich, Landscape Architect, Inyo National Forest
- Jon Kazmierski, District Recreation Officer, Inyo National Forest

4.3 References

- Noesser, Erin. 2013. Hydrology, Soil and Air Quality Report, Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Bishop, CA: Inyo National Forest, U.S. Department of Agriculture.
- Perloff, Richard. 2013a. Biological Evaluation – Animals, Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
- Perloff, Richard. 2013b. Management Indicator Species Report, Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
- Weis, Sue. 2013a. Biological Evaluation for Threatened, Endangered, Proposed, and Sensitive Plants. Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
- Weis, Sue. 2013b. Noxious Weed Risk Assessment. Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
- Foxworth, Bob. 2013. Cultural Resource Report, Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
- Rich, Katy. 2013. Visual Analysis Report, Shady Rest Off-Highway Vehicle/Over Snow Vehicle Staging Area Project. Mammoth Lakes, CA: Inyo National Forest, U.S. Department of Agriculture.
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- Inyo National Forest, 2013. Final Environmental Impact Statement (FEIS) Casa Diablo IV Geothermal Development Project. Inyo National Forest, U.S. Department of Agriculture.

Inyo National Forest, 2012. Decision Memo. Inyo National Forest Over Snow Vehicle Trail Grooming. Inyo National Forest, U.S. Department of Agriculture.

USDA Forest Service, Inyo National Forest. 1988. Land and Resource Management Plan. Bishop, CA.

USDA Forest Service, Pacific Southwest and Intermountain Regions (2004). Sierra Nevada Forest Plan Amendment - Final Supplemental Environmental Impact Statement (SEIS) Programmatic Agreement among the U.S.D.A. Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region (RPA).and Record of Decision (ROD). Vallejo, CA.

Appendix A: Response to Comments

Shady Rest OSV/OHV Comment Analysis- Issues List

Count	Author	Representing	Date	# of comment from individual	Comment	Comment Response	Change to the EA
1	Bob Rowen	SnowLands	10/22/2013	1a	The Inyo National Forest needs to conduct Subpart C. The Forest Service should not in a piecemeal manner make OSV travel even more permissive than OHV travel without engaging in full winter travel management.	This project is modifying the trailhead location to address existing conflicts, not creating change to the overall use of the trail system. Therefore, do not need to conduct Subpart C. This project is not making OSV travel more permissive.	
				1b	The Inyo National Forest needs to protect a reasonable amount of accessible lands for clean and quiet (non-motorized) winter recreation.	There is currently a reasonable amount of accessible land for clean and quiet recreation within the wilderness areas as well as non-wilderness lands prohibited to motorized use in the Mammoth area. See Mammoth Lakes Winter Recreation Map for more information. http://www.ci.mammoth-lakes.ca.us/documents/133/2010%20ML%20Winter%20Recreation%20Map-small.PDF	Added Mammoth Lakes Winter Recreation Map to Appendix C of the EA and cited in text, section 1.1.
				1c	The Inyo National Forest needs to take appropriate steps to limit the environmental degradation caused by OSVs.	There is no evidence of increased environmental degradation with this project as there is no change to the trail system and its use. Also, see Section 2.2 Design Features common to Alternatives 2 & 3 for discussion of the mitigation and protection measures for OSV use. These features limit environmental impacts of OSV use Impacts of OSV use on air, soil, and water are discussed on pages 15 - 19 of the EA.	
1	Bob Rowen	SnowLands	10/22/2013	2	Incorporates Scoping Comments by reference.	There is no change to air, soil, and water as there will be no change to the trail system or use. This project is only changing where the staging area is located. The rideback trail has been removed from the project.	
1	Bob Rowen	SnowLands	10/22/2013	3	Impacts from all OSV projects (particularly Scenic Loop) need to be considered together with the Shady Rest Project.	Scenic Loop Project is not moving forward at this time.	
1	Bob Rowen	SnowLands	10/22/2013	4	Supports separation of uses.	Alternative 3 provides for the greatest separation of uses because it removes the inclusion of the rideback.	
1	Bob Rowen	SnowLands	10/22/2013	5	Supports alternative 3, but without rideback trail and without additional OSV parking area.	Alternative 3 provides for the greatest separation of uses because it removes the inclusion of the rideback.	
					Rideback trail and new parking area would directly impact non-motirized users by bringing noise and exhaust close to Nordic track system, which may be significant impact. Further, it will cause air quality that fails to meet environmental standards for human	Alternative 3 provides for the greatest separation of uses because it removes the inclusion of the rideback.	

					respiration.		
1	Bob Rowen	SnowLands	10/22/2013	6	Incorporates 6 studies into comments (see comment letter).		
2	Drew Foster	Friends of the Inyo	10/24/2013	1	Disagrees there is "widespread" support for project.	Reworded sentence to read, "In summary, there was some support for this project and some concerns about mixing motorized and non-motorized use within the Shady Rest area".	Replaced the word "widespread" with "some" in the EA.
					This project should not move forward until a comprehensive master plan is completed for the entire shady rest area including; CD4, Scenic Loop, Borrow Pit, and larger areas to Highway 395 and Inyo Craters. Friends of the Inyo supports putting this project on hold.	There is no regulatory requirement for a comprehensive master plan for this project. There have been identified conflicts this project is going to address. The project is also consistent with exiting Forest Plan direction.	
2	Drew Foster	Friends of the Inyo	10/24/2013	2	Questions initial and ongoing cost of facilities and Forests ability to maintain facilities.	There is a potential for partnerships and grants to assist with the initial and ongoing costs of the proposed facilities. Current uses within the area have known impacts to the Shady Rest Park and campgrounds in the area. Existing facilities such as the park and campgrounds will benefit from a properly designed staging facilities by reducing such impacts.	
2	Drew Foster	Friends of the Inyo	10/24/2013	3	Insufficient information to properly comment due to lack of site design and site description. Requests further information and extend comment period.	See Appendix B of the EA for site plan and description.	Added site plan to Appendix B of EA.
2	Drew Foster	Friends of the Inyo	10/24/2013	4	Alt 2 rideback trail recreates current conflicts and Alt 3 inadequately solves current user conflicts, and neither alternative adequately solved the stated problem of user conflicts.	See table 1 on page 10; Purpose and Need for Alternatives 2 & 3	
2	Drew Foster	Friends of the Inyo	10/24/2013	5	Impacts to Goshawk and Mountain Quail are inadequately discussed in conjunction with other acknowledged projects; CD4, scenic loop, and borrow pit. Cumulative impacts analysis for these species is inadequate and need to be included in "Environmental Consequences" section of document.	Wildlife specialist report is included in project file.	Cumulative Effects summary from Wildlife report added to EA. See section 3.2 Effects to Wildlife

2	Drew Foster	Friends of the Inyo	10/24/2013	6	Effects to cultural resources will likely continue with or without proposed staging area, and the benefits from Alts 2 and 3 is just an assumption. Master planning should be completed to incorporate and address cultural impacts.	Area was surveyed for cultural resources. Designation of winter and summer staging area that is designed and located to avoid cultural resources will prevent and reduce effects to known sites. Having a designated staging area can facilitate rehabilitation of areas where impacts to cultural resources have occurred.	
					Statement on pg. 22 says alternative 3, "segregation of user would minimize user conflicts and reduce tensions between user groups". This statement is conjecture. The Forest needs to undergo comprehensive planning process.	Creating separate areas would reduce the potential contact between user groups would reduce encounters therefore reducing instances of conflict.	
2	Drew Foster	Friends of the Inyo	10/24/2013	7	Incursions into non-motorized areas will continue regardless of implementing Alt 2 and 3.	Both ORMAT and Forest Service monitor and manage incursions. If there is a defined separation of use it is easier to identify and regulate incursions.	
2	Drew Foster	Friends of the Inyo	10/24/2013	8	Analysis is incomplete as is does not consider recreation; uses beyond nordic skiing, OSV, and OHVs. Analysis should include mountain bike trails, and other dispersed recreation.	Recreation uses beyond nordic skiing, OSV, and OHV's is outside the scope of this project.	
2	Drew Foster	Friends of the Inyo	10/24/2013	9	Supports Alternative 1: No action until comprehensive planning is completed.	Same as for Comment #1. The Forest Plan is our "master plan". This project is consistent with existing Forest Plan.	
3	John Wentworth	MLTPA	10/26/2013	1	Insufficient information to properly comment due to lack of site design and site description. Therefore cannot analyze whether or not is addresses identified needs. Several of our scoping comments were not addressed.	incorporate site plan and conceptual drawings into EA.	Added site plan to Appendix B of EA.
3	John Wentworth	MLTPA	10/26/2013	2	Current project map fails to identify important recreation infrastructure; Multi Use Paths, Blue Diamond Trail routes, Orange Diamond Trail routes, Grooming routes, Mountain bike trails and routes.	Incorporate data layers into map.	See Appendix D for updated maps of each alternative.
3	John Wentworth	MLTPA	10/26/2013	3	Insufficient narrative providing clarification between ORMAT and FS admin sites and how they relate to widening of Sawmill Cut-off Road.	This information is not necessary to support decision. This project is addressing existing geothermal development, no separation of uses, insufficient facilities at the park and user conflicts.	
3	John Wentworth	MLTPA	10/26/2013	4	Insufficient information on project costs and financial responsibilities between ORMAT and FS.	This information is not necessary to support decision. This project is addressing issues associated with existing geothermal development, no separation of uses, insufficient facilities at the park and user conflicts.	

3	John Wentworth	MLTPA	10/26/2013	5	Insufficient info on public engagement conducted in 2011 and the appropriateness of a collaborative planning effort.	EA states on page 5 section 1.3 the Forest Service hosted three public meetings. Both motorized and non-motorized users attended the meeting and gave input. The Forest Service used that input to plan the project accordingly.	
3	John Wentworth	MLTPA	10/26/2013	6	EA does not mention efforts conducted in regards to rec opportunities between TOML and INF, and including this into the Mammoth Lakes Trail System. FS and TOML have MOU.	TOML and FS can cooperate on this project under the MOU after the decision authorizing construction is made. Staging area could become part of MLTS.	
3	John Wentworth	MLTPA	10/26/2013	7	EA does not mention field trips or site visits for upcoming winter season.	There is no requirement to conduct any more public meetings, therefore there are none planned.	
3	John Wentworth	MLTPA	10/26/2013	8	No mention of Mammoth Lakes Trail System and does not mention integrating proposed facility as identified "node" or incorporating signage and wayfinding to current MLTS.	At this time it is unknown if the town will participate or be involved in this staging area. Currently we are conducting the proper level of environmental analysis to authorize construction of this staging area. This does not preclude integrating into MLTS at a future date.	
3	John Wentworth	MLTPA	10/26/2013	9	Need to move original motorized staging area due to ORMAT's activities is not discussed and there for unable to determine if project will satisfy public need.	EA provides discussion of ORMAT's involvement in the need to move the staging area on page 1 section 1.1 Introduction. Moving historical staging area also benefits separating motorized and non-motorized users, and reduces damage to the campground and park.	
3	John Wentworth	MLTPA	10/26/2013	10	Supports Alternative 1: No action until comprehensive planning is completed.		
4	Malcolm Clark	Range of Light Group, Sierra Club	10/28/2013	1	Supports Alternative 1: No action		
4	Malcolm Clark	Range of Light Group, Sierra Club	10/28/2013	2	Supports MLTPA letter. Also supports removing staging from 203 and Shady Rest Park and creating facilities for OSV/OHV with defined boundaries and opposes rideback trail.		
5	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	1	EA does not address economic impacts to outfitter guides (DJs in particular) and does not address current grooming issues and need for increased grooming under the project.	Outside the scope of the project. Project is about dealing with identified problems related to historic staging.	
5	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	2	No study has been conducted to examine the financial impacts to permittees required by the CFR's, outfitter guideline handbook, and outfitter permits and operating plans.	Outside the scope of the project.	
5	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	3	State funded groom is unable to keep up with grooming requirements because the area where the groomer is stored receives less snow and is unable to access trailhead. DJ's does grooming	Outside the scope of the project.	

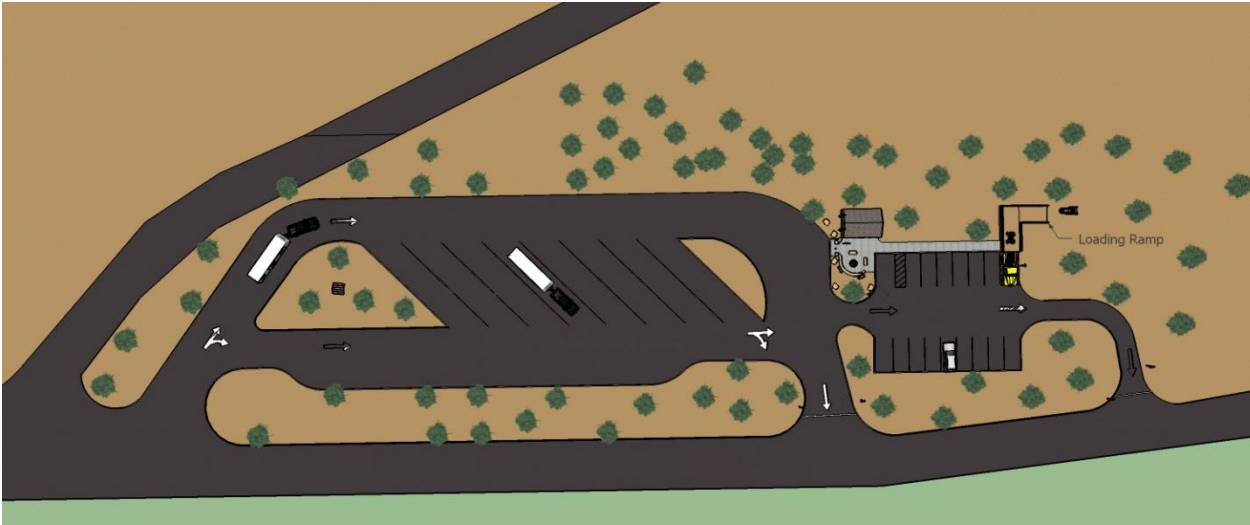
					without compensation.	
					The EA violates the 1988 LMP because it states that the project will concentrate recreation, and the 1988 LMP states that dispersed recreation should be dispersed.	Chapter 1 section 1.1 Introduction paragraph 2 references the Inyo National Forest Land and Resource Management Plan in stating that this area is designated as a "Concentrated Recreation Area".
5	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	4	No alternative resolve "perceived conflicts", because the proposal will concentrate motorized and non-motorized users in the Shady Rest area. Snowmobilers were there first (1971) and Nordic trails (1990) should leave if they don't like the noise.	The "perceived conflicts" were determined through public meetings and scoping letters received. Project planning was conducted according to public information received as well as information received by Forest staff who has worked in this area for many years.
5	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	5	Does not support the deletion of the rideback trail as it eliminates grooming.	Whether or not there is a rideback trail does not eliminate the groomer's access to the trail system.
	Jewel Little	DJ's Snowmobile Adventures	10/26/2013	6	States she requested copies of project record and was not provided with alternatives to meet her needs as she is disabled.	Project record is available to anyone by appointment.
6	Sandy Hogan	Self	10/21/2013	1	Supports Alternative 2 but should include in the EA closure of OHV use within the Shady rest park along with appropriate closure signage, barriers, and restoration.	Rehabilitation of staging areas that are rendered unnecessary can be considered after the new staging area is constructed.
7	Steve Speidel	Speidel/Money Family	10/4/2013	1	States EA is discussing two separate projects; ORMAT's winter access needs and Staging for OSV/OHV recreation. States it seems ORMAT is taking precedence over previous uses in the area (ex. Green sticker grooming of sawmill cut-off rd.).	This project is addressing issues associated with existing geothermal development, no separation of uses, insufficient facilities at the park and user conflicts. ORMAT has a geothermal lease which gives it the right to develop geothermal energy. This can give ORMAT precedence over other uses.
7	Steve Speidel	Speidel/Money Family	10/4/2013	2	Does not agree issues are accurately represented in EA and wants proof of issues raised by public.	Project record is available to anyone by appointment. Three public meetings on the Shady Rest Staging Area Project were held in 2011 and a comment letter from Snowlands also describes motorized verses non-motorized user conflicts.
7	Steve Speidel	Speidel/Money Family	10/4/2013	3	Believes ORMAT's needs are dictating need for new staging area.	This project is addressing issues associated with existing geothermal development, no separation of uses, insufficient facilities at the park and user conflicts.

7	Steve Speidel	Speidel/Money Family	10/4/2013	4	The statement "Currently, there are no developed staging facilities for OSV/OHV use in the vicinity of Shady Rest Area" is not factual.	The Forest Service does not currently have any developed facilities for OSV/OHV in the shady rest area. All the staging in this area is either at Shady Rest Park, where there is no development, along roadsides, or in old landings. These areas were not designated or constructed to serve as OSV/OHV staging areas.
7	Steve Speidel	Speidel/Money Family	10/4/2013	5	Existing road is not constructed to facilitate winter plowing.	Existing road will be widened and improved to facilitate winter plowing and safe access to staging area.
7	Steve Speidel	Speidel/Money Family	10/4/2013	6	EA's need for action does not mention ORMAT's need for access. All other needs stated can be accommodated by Shady Rest Park, Campground Entrance, and Welcome Center Parking area.	It has been determined that staging at Shady Rest Park, Campground Entrance, and Welcome Center Parking area does not provide for the proper separation of uses, therefore does not reduce user conflicts. Stuart Brown of TOML has stated that OSV staging is not desirable at Shady Rest Park due to concerns about damage to park infrastructure. Also, FS has observed that the Park layout is challenging for trailer turnaround and parking. FS has observed damage to campground infrastructure due to plowing and winter use, and also that mixing of motorized and non-motorized is not ideal.
7	Steve Speidel	Speidel/Money Family	10/4/2013	7	Expresses concern for ORMAT's underground crossings, even though buried, could heat soil and cause safety issues. May need to place artificial materials to prevent snow melt.	Page 8 section 2.3 Alternative 2 #3 Rideback Trail discusses the material used to protect both the snowmobile and paved road.
7	Steve Speidel	Speidel/Money Family	10/4/2013	8	Lists impacts caused by proposal; Goshawk habitat, road widening, road lengthening, new area for parking, restrooms, winter use of the MUP paved trail, tree and brush removal.	The nature and extent of all these impacts are addressed in the EA. As stated in draft DN and FONSI we believe these impacts are not significant.
7	Steve Speidel	Speidel/Money Family	10/4/2013	9	Describes 4 additional possible options/solutions in detail.	FS believes one or more alternatives presented in the EA better solve the identified conflicts.
7	Steve Speidel	Speidel/Money Family	10/4/2013	10	States Alt 4 has the least impact and is his preferred alternative.	

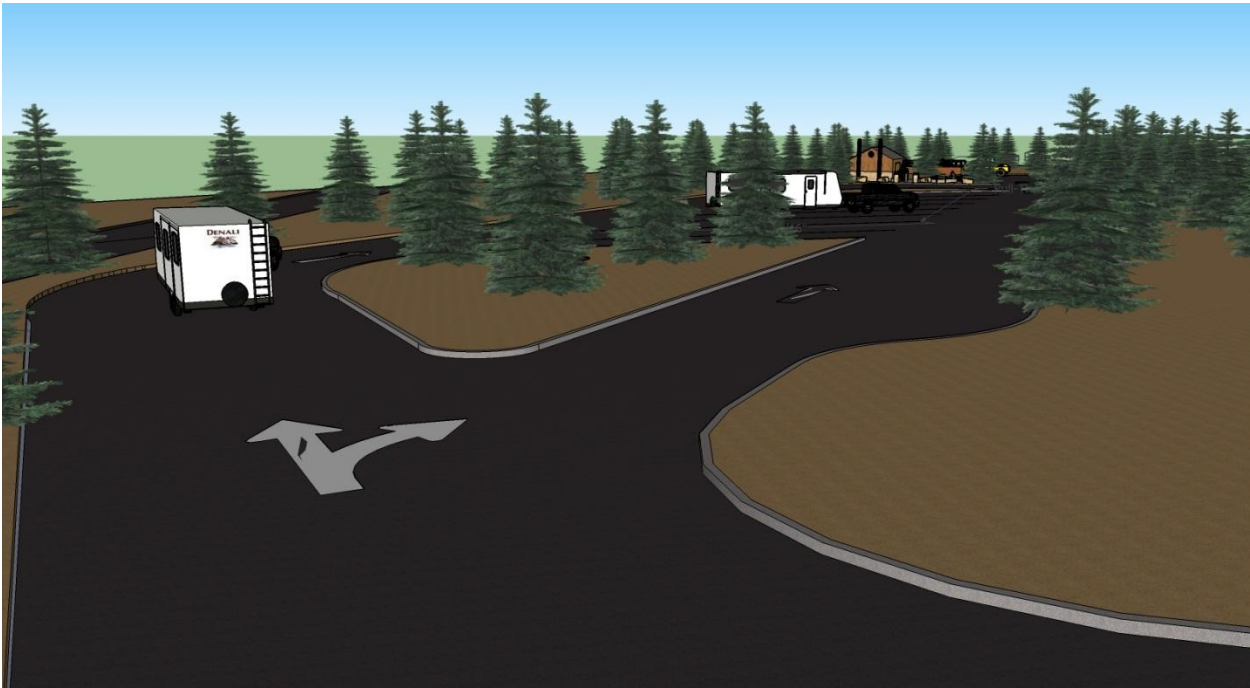
Jon Regelbrugge, District Ranger,
Mammoth and Mono Lake Ranger
Districts

Date

Appendix B: Conceptual Site Design: Shady Rest OSV/OHV Staging Area



Site Plan: Not to scale · North ↗



View of entrance to the staging area.

Appendix B: Continued



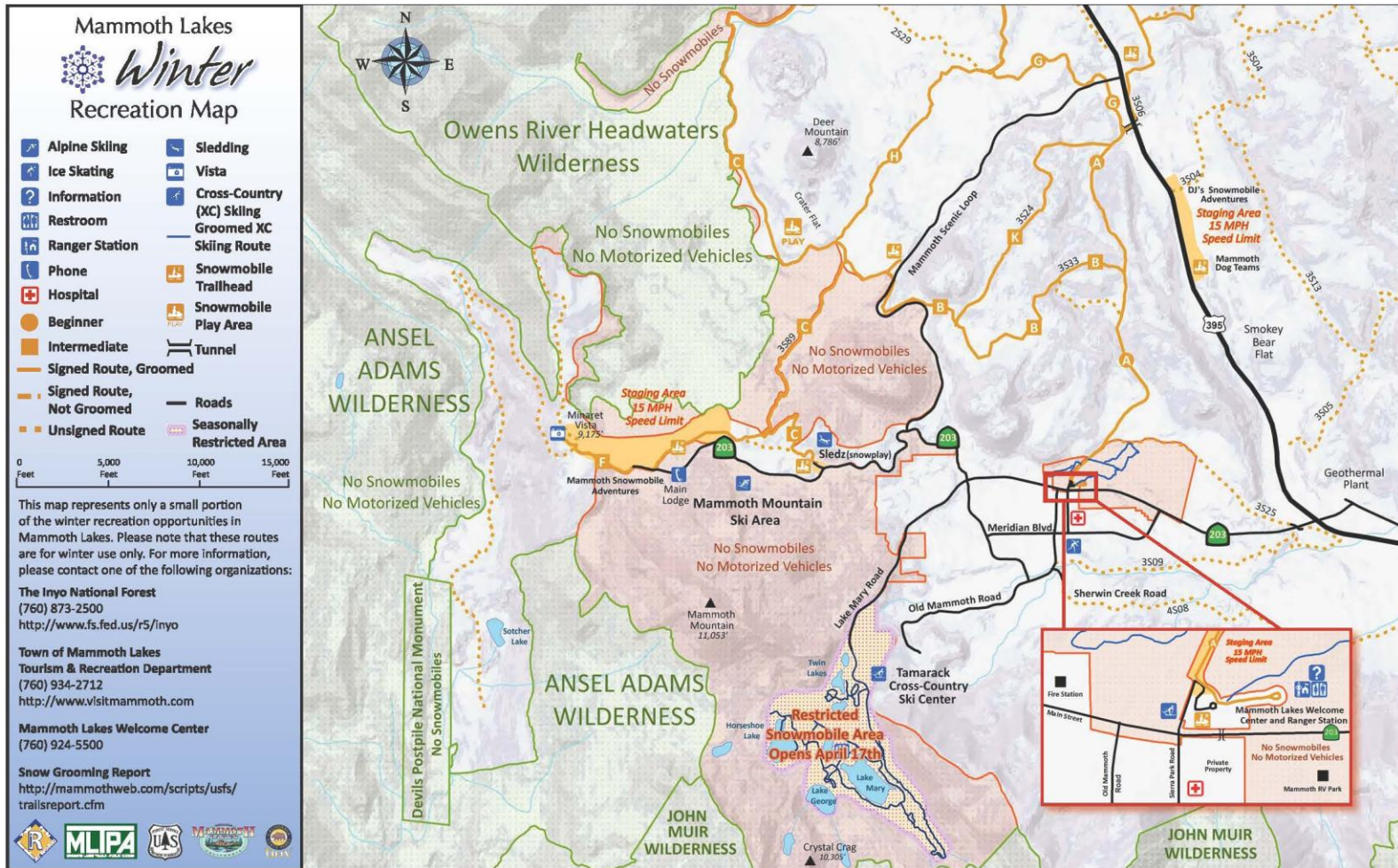
View of passenger car/truck parking area, loading ramp and restroom.



View of restroom and info kiosks.

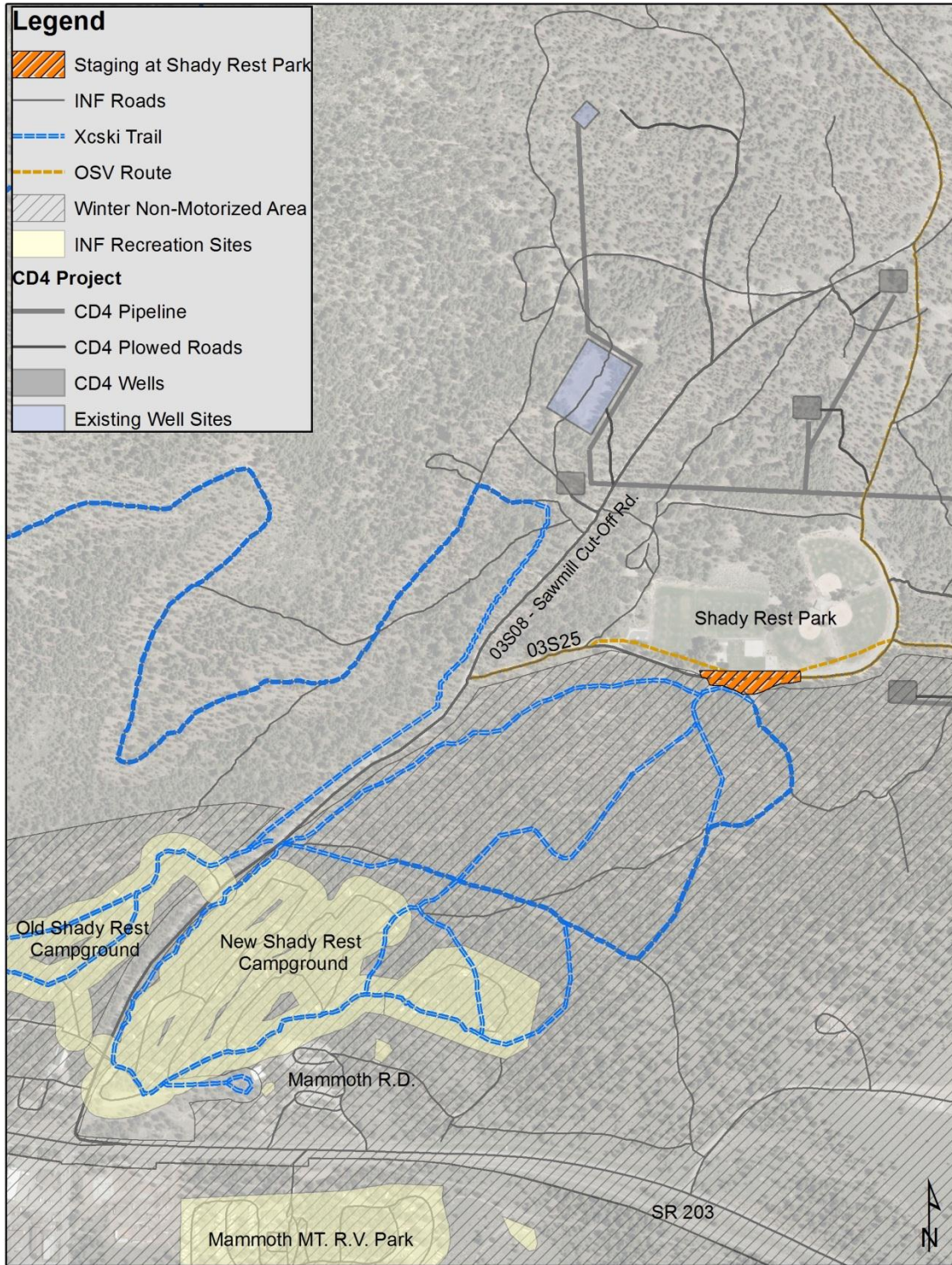
Appendix C: Mammoth Lakes Winter Recreation Map

Also available at: <http://www.ci.mammoth-lakes.ca.us/documents/133/2010%20ML%20Winter%20Recreation%20Map-small.PDF>



Appendix D: Maps

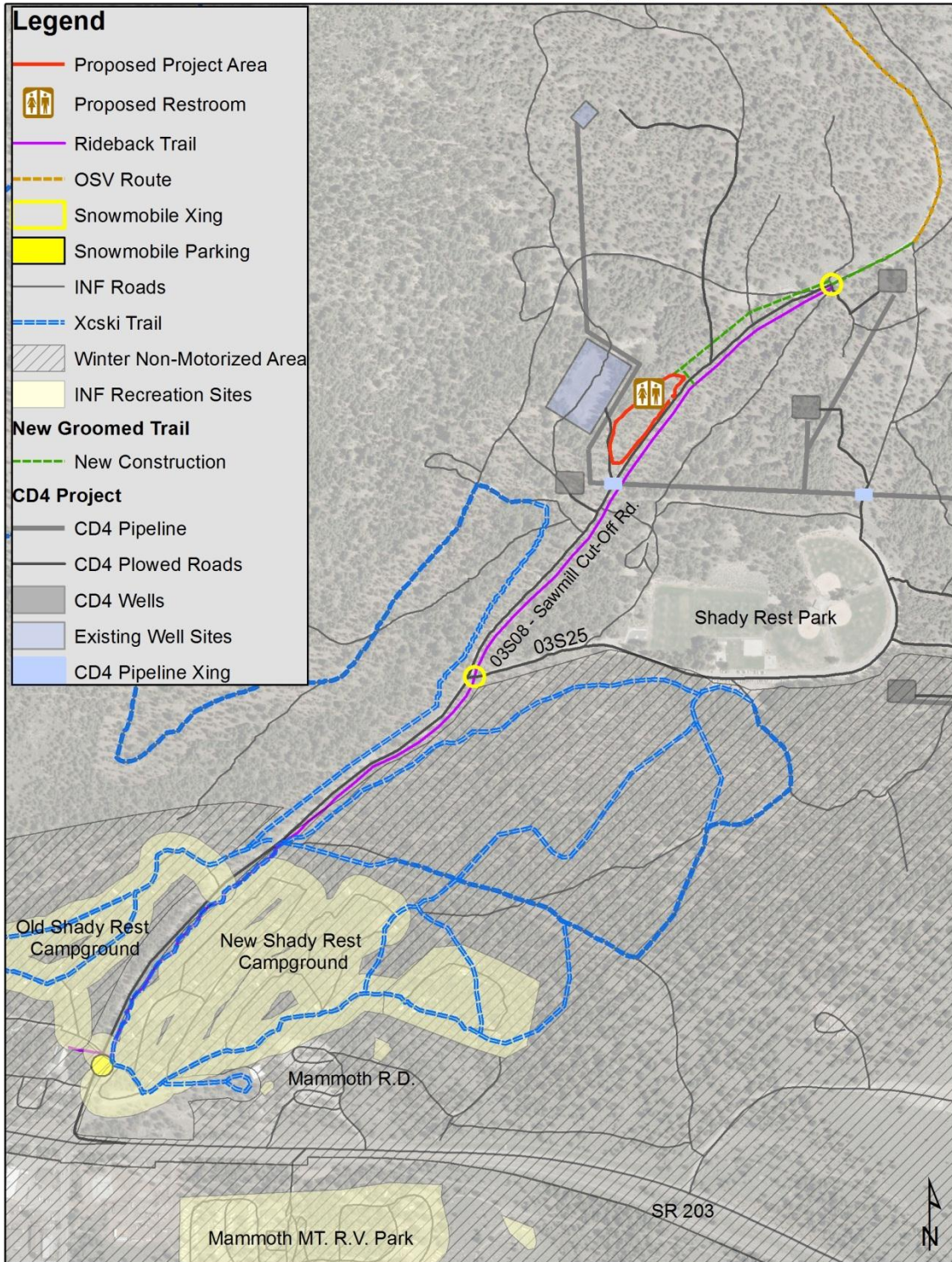
Shady Rest OSV/OHV Staging Area
Alternative 1: No Action



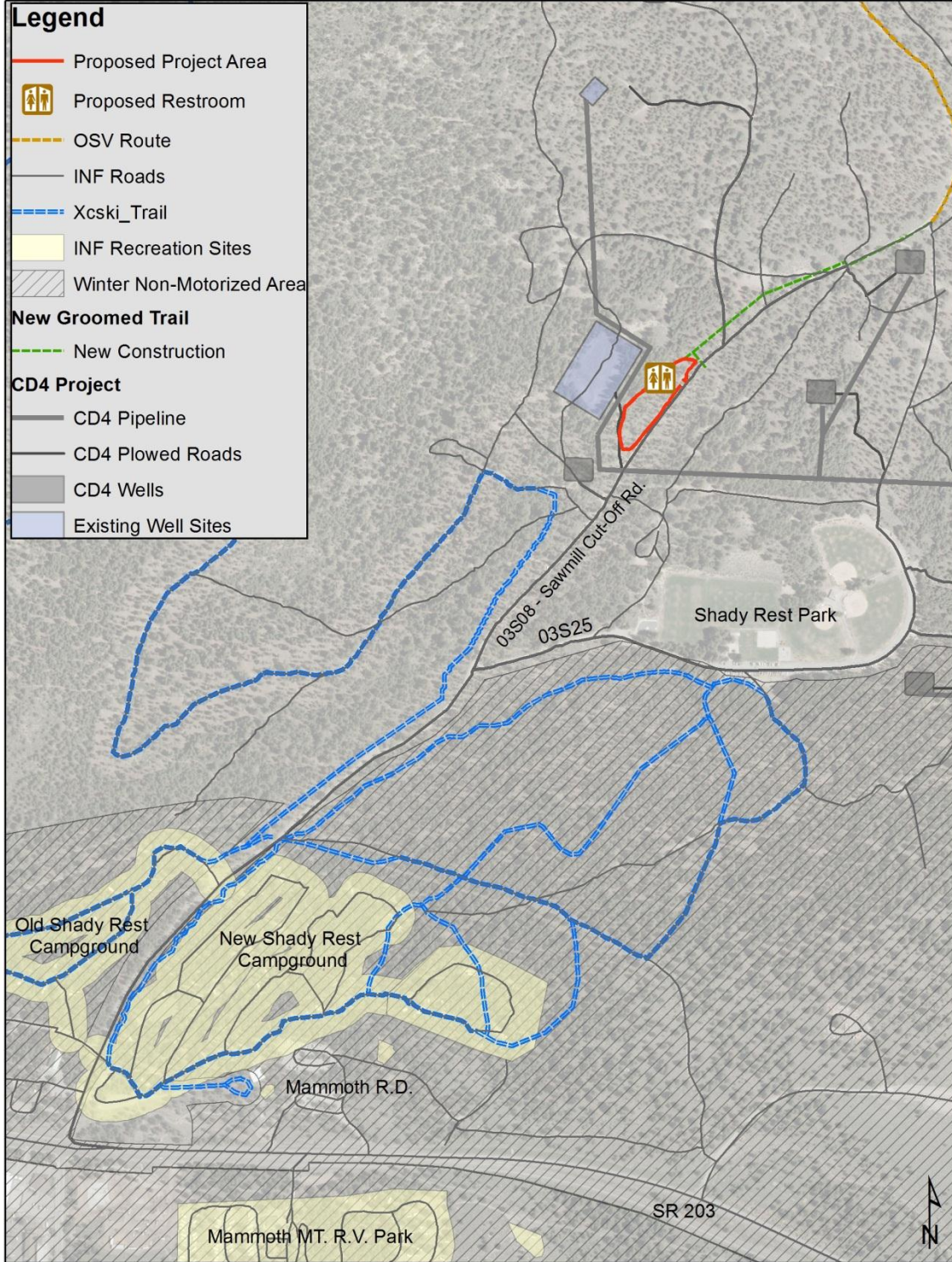
Date: 12/20/2013



Shady Rest OSV/OHV Staging Area Alternative 2: Modified Proposed Action - Staging Area Development



Shady Rest OSV/OHV Staging Area Alternative 3: Staging Area Development minus Ride-Back Trail & OSV Parking



Date: 12/20/2013

0 0.0325 0.065 0.13 0.195 0.26 Miles

Shady Rest OSV/OHV Staging Area Alternative 4: New Shady Rest Campground Entrance

