

November 12, 2008,

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

Subject: Draft Snowcreek Neighborhood District Plan

Dear Chairwoman Tenney and Members of the Commission,

Thank you for the opportunity to comment on the October 10, 2008 draft of the Snowcreek Neighborhood District Plan. We have reviewed the draft district plan for accuracy and for inclusion of our prior recommendations. The "Preferred Plan and Recommendations" chapter of the draft district plan includes connectivity policies and direction that should make for a district that reflects the values of the community relating to trails and public access concerns as documented in the Town of Mammoth Lakes General Plan.

Our detailed comments are:

- 1. *ERRATA:* Figure 1-1 This graphic should be included at an appropriate place in the "Introduction", after it has been referred to in the narrative, and not before the "Introduction" has started. It is confusing to the reader to have a proposed master plan introduced in a draft neighborhood district plan before the narrative has even started, and without narrative context.
- 2. *ERRATA:* Figure 1-2. This map should include jurisdictional boundaries.
- 3. ERRATA: Table 1-1. There are numerous errors throughout the table. For example, GIC Point 16 is currently being used for winter egress from the Sherwins, even though it requires crossing private property; GIC points 27 and 137 Tamarack Street do not constitute a formal trailhead and involve crossing private property; GIC point 98 needs to clarify that Sierra Meadows Ranch is a privately owned and operated facility located on public lands administered by the United States Forest Service; GIC point 136 has no public parking authorized by property owners; and GIC point 163, "Burrow" pit should be spelled "borrow" pit. MLTPA would be happy to further review table 1-1 with the consultant to assure accuracy and consistency with the MLTPA GIC.
- 4. *ERRATA:* Page 13. The General Plan Characteristics list is abbreviated from the list in the General Plan and omits substance and detail. Please note that the list in the General Plan is still the controlling policy document. MLTPA will be happy to provide the consultant with relevant citations from the General Plan.
- 5. *ERRATA:* Page 13. Please note that the "Town of Mammoth Lakes Trail System Master Plan - Draft" (TSMP) indicates that it is the responsibility of the individual districts to do their own internal trails planning. The TSMP does

not provide for any trails planning within any district. The TSMP will provide design guidelines for trail types as well as for signage and wayfinding.

- 6. *ERRATA:* Figure 1-9. This image is not of the NDP or its SOI.
- 7. *ERRATA:* Page 19. The photograph does not appear to be from the Snowcreek District Plan Site or its SOI. The local pines are Jeffreys, not ponderosas. Also, the trees in the photograph include Red Firs.
- 8. *ERRATA:* Figure 2-5. MLTPA could not find reference or discussion of "Figure 2-5" in the text. MLTPA supports the conceptual locations of the second vehicle access point and the proposed M.U.P. on the south and the Sherwin access/egress point to the southwest. Discussion of the conceptual locations and the principles underlying these locations need to be included in the NDP.
- 9. *ERRATA:* Page 24. Second constraint. The need for an engineered design does not constitute a constraint. Note that the formatting is inconsistent.
- 10. POLICY: Page 24. Third opportunity. There are no current developed connections to the Sherwins and the only connection to Mammoth Creek is via the Main Path of the Mammoth Lakes Trail System. Completing and expanding these connections is a critical component of the NDP.
- 11. POLICY: Page 24. Final constraint. The lack of access through the district and the requirements of the Inyo National Forest for improving recreation may be greater constraints than the lack of developed infrastructure. Not all amenities and portals will require active management by the hotel and that is not a constraint on their development - the operational and physical requirements of the golf course may be, and should therefore be factored into the design of the golf course form inception.
- 12. POLICY: Page 27. First constraint. Many sustainable technologies and project components are no more expensive than traditional ones and costs can usually be recovered through higher sales prices. Trails are often the highest return per dollar invested of any project amenity. MLTPA will be happy to provide to the consultant literature and analysis supporting the economic value of trails and trail systems.
- 13. ERRATA: Page 27. First constraint. MLTPA strongly supports the last sentence, "...preparing now..."
- 14. POLICY: Page 33. "Observations: Golf" The golf course should be designed from it's inception to accommodate a variety of winter recreation activities so that the best use(s) of the golf course in all seasons can be accommodated.
- 15. *ERRATA:* Page 33. The final paragraph refers to GIC Points in figure 4-3, but there are no GIC points represented in figure 4-3.
- 16. *ERRATA:* Figure 4-3. This should be re-labeled as Vehicular Circulation and Public Access. Note that there is no public access available through Snowcreek V.
- 17. *ERRATA:* Figure 4-4. This figure needs to be developed into two figures indicating "potential connectivity" in both Winter and Summer articulations, with appropriate maps and graphics for each.
- 18. ERRATA: Figure 4-5. "Potential Public Access" (as indicated in legend) is confusing. Snowcreek V does not provide opportunities for public access.
- 19. ERRATA: Page 37. "Observations: Circulation and Mobility" (# 6) "... during winter months" should include provisions for winter maintenance.

- 20. *ERRATA:* Page 37. The final three sentences on the page are not supported by the graphic (Figure 4-5). The "public" access opportunities that will connect from "downtown Mammoth" need to be indicated and shown on Figure 4-5.
- 21. POLICY: Page 38. The Outfitter's Cabin Location is not proximate to USFS trail connections the closest system trail is Mammoth Rock Trail, and it is not accessible from the site. Reference should be made to SATSS.
- 22. ERRATA: Page 39. The first bullet should be reworded to say "Where applicable, the goals of the Parks, Open Space, and Recreation Element of the General Plan shall be supported." Following goals and policies of the general plan is not optional under California law. MLTPA supports the observations in the two paragraphs at the bottom of the left and right columns. To be added to the "Observations: Open Space, Public Access and Amenities" the golf course should be designed from inception to accommodate winter recreation activities.
- 23. *ERRATA:* Page 40. Figure 4-6 is mislabeled as "Summer Recreation Opportunities" – it should be labeled as "Winter Recreation Opportunities". Connections and access/egress to GIC 163 should be included for potential "Sherwin Range" Access.
- 24. *ERRATA:* Page 40. GIC #79 in Figure 4-6 is a trailhead for a trail that is within the NDP but has no legal standing, has no formal easement. This trail should be formalized with a binding public access easement.
- 25. *ERRATA:* Page 42. First column, fourth bullet; the sentence should be reworded to say "The golf course should be designed to accommodate a variety of winter recreation activities including cross-country skiing."
- 26. *ERRATA:* Page 42. First column, fifth bullet. What is meant by "Alternative public winter egress should be provided for the Sherwin Range back-country trail users"? Provided by whom/what? Within the district? Reword to delete the word "alternative" as it is confusing.
- 27. POLICY: Page 44. Table 4-1. It is premature and not the role of the NDP to decide what facilities and activities will be fee based versus free. This will depend on who provides the activity, its location, and other decisions outside the scope of the NDP. "Winter Walking" and "Snowshoeing" should be included as proposed recreation activities along with cross country skiing in the winter on the golf course. The GIC points are listed as "xx" what does this mean/indicate?
- 28. *ERRATA:* Page 67. "Internal Circulation" bullet # 5. This requires clarification as there is already a proposed MUP on the North Side of Old Mammoth Road, what is this bullet referring to?
- 29. POLICY: Page 67. "Internal Circulation" # 8 Opportunities of the EVA for pedestrians, bikes and other "feet first" activities should be analyzed and developed.
- 30. ERRATA: Page 70. Figure 6-3. What does callout "Potential USFS Land/Sherwins Access mean? There is no access from these identified points.
- 31. *ERRATA:* Page 72. Figure 6-6 is lacking descriptive language as is found in Figure 6-7. It should be provided.

- 32. *ERRATA:* Page 74. Bullet #9. The reference to "along the cart paths" should be deleted. Roughs and some fairway areas may be used for Nordic skiing and winter recreation activities as well.
- 33. POLICY: Page 74. "Trails and Paths" Language should be included recognizing the need for winter maintenance and that a winter trails and paths system needs to be developed/maintained concurrent with the summer trails and paths infrastructure.
- 34. ERRATA: Page 75. GIC Point # 137 should be included on the bulleted list in the left hand column.
- 35. *ERRATA:* Page 75. MLTPA supports the "Interpretive Center" discussion as it promotes trail opportunities.

Thank you again for the opportunity to comment on the Draft Snowcreek Neighborhood District Plan. Mammoth Lakes Trails and Public Access appreciates the ability to be a part of the process and looks forward to a successful completion of the NDP process for the Snowcreek District.

Sincerely,

John Wentworth Mammoth Lakes Trails and Public Access Foundation