

File Code: 1950-

EPA Date:

Febru
ary 9, 2015

Dear National Forest User,

The USDA Forest Service, Inyo National Forest (INF) has initiated National Environmental Policy Act (NEPA) analysis for the *Lake George Multiple Use Path Trail Construction project* and for the issuance of special use permits to the Town of Mammoth Lakes for 1. The construction, operation, and maintenance of the proposed path and 2. The maintenance of public roads within the Mammoth Lakes Basin. **(COMMENTS #1)** The project is located within the Mammoth Ranger District on the Inyo National Forest. See the enclosed vicinity maps and project area detail maps for more information.

COMMENTS #1

1. For the purposes of establishing responsibility for long term maintenance responsibilities, who is the proponent for this project? Is it the Town of Mammoth Lakes (TOML) or the USFS?
2. What planning documents – either USFS or TOML, adopted or referential – are the source documents for the proposed projects?

Project Location

The proposed *Lake George Multiple Use Path Trail Construction* project would be located in the Mammoth Lakes Basin with beginning and ending termini at the "Main Lake Mary Road/Pokenobe Resort" intersection (adjacent to the bus stop across from Pokenobe Resort) and at the Lake George/Crystal Crag trailhead and parking area. The proposed trail would run parallel to the road departing from the Pokenobe intersection, cross the outlet of Lake Mary adjacent to the existing bridge, cross the road and climb up the north facing slope below Lake George and end just below the stop sign at the Lake George parking lot. There would also be a spur that drops from the main trail and connects to the Lake Mary Road, designed for users wanting to travel around the "Lake Mary Loop." **(COMMENTS #2)**

COMMENTS #2

1. The "Lake Mary Loop" should be identified by its facility type and primary purpose – is it a trail? A road? Primarily for motor vehicles or primarily for pedestrian/bicycle use?

Purpose and Need for action

INF and TOML work cooperatively to deliver the *Mammoth Lakes Trail System* (MLTS), a network of trails on the Inyo National Forest and on municipal lands in and near the Town of Mammoth Lakes. The INF and TOML share an interest in enhancing the MLTS to provide diverse recreation experiences that promote the use and enjoyment of public lands in the Eastern Sierra. **(COMMENTS #3)** The INF and TOML also share a goal of promoting public land access and transportation networks that reduce vehicle congestion and carbon emissions. **(COMMENTS #4)**

COMMENTS #3

1. The relationship of the Town and the USFS regarding the Mammoth Lakes Trail System is memorialized in the "Mammoth Lakes Trail System MOU" as executed in June of 2013. The MOU should be acknowledged as the document of shared understandings with regards to the Mammoth Lakes Trail System.

COMMENTS #4

1. Is there documentation to substantiate that the Town and the USFS share these mutual goals?

The Mammoth Lakes Basin (Lakes Basin) is a heavily used recreation area, both in summer and winter seasons. In the summer, the Lakes Basin is used for camping, lodging, fishing, equestrian riding, biking, cycling, running, paddling, and several other recreation activities. In many places, these uses overlap, causing congestion and potential safety issues. From July 4th through Labor Day, all campsites and lodging are often full and it can be very difficult to locate an available parking spot. Providing walkers, runners, and bicycle users additional mileage of developed surface to travel on will reduce pedestrian/vehicle conflicts within the project area and encourage users to travel on foot or bicycle to visit one of the premiere destinations within the Lakes Basin. (COMMENTS #5)

COMMENTS #5

1. Rationale should be provided that specifically documents how the proposed project and its attendant design components will "... reduce pedestrian/vehicle conflicts within the project area and encourage users to travel on foot or bicycle to visit one of the premiere destinations within the Lakes Basin."
2. What is the data/source in support of the statement: "From July 4th through Labor Day, all campsites and lodging are often full and it can be very difficult to locate an available parking spot." ?
3. Will the project reduce conflicts between other users as well (equestrian/bicycle, campgrounds/day use, etc) ?
4. Does the USFS anticipate that the design recommendation of this project may potentially become design standards for the entire Lakes Basin, especially in terms of the pedestrian/vehicle conflicts that occur between traffic on MUPs and vehicular traffic on roadways?
5. Alternatives should be developed which identify surfaces in addition to "developed surface (s)"

In 2011, with support from the INF, the TOML applied to and received a Federal Highways Administration grant to plan, design, and construct a paved multiple use trail in the Lakes Basin that would improve pedestrian and bicycle access, reduce the demand for vehicle use, and improve road safety for vehicles and pedestrians alike. (COMMENTS #6) The INF and TOML have been working cooperatively to study trail options, vehicle use patterns, parking, recreation access, natural and cultural resources, and other uses and issues within the project area. Cooperatively, the INF and TOML have developed this proposal for a multiple-use path trail project. (COMMENTS #7)

COMMENTS #6

1. Is this statement in reference to the Sarbanes grant?
2. Is a single "paved multiple use trail in the Lakes Basin" the extent of the scope of work for the Sarbanes Grant?
3. How does this proposal for a MUP fit into other project recommendations from the Sarbanes Grant and should this NEPA process be extended to include other project recommendations?

COMMENTS #7

1. Is this comment in reference to the LABSS effort?
2. How does the LABSS inform USFS decision making with regards to the Mammoth Lakes Basin if at all?
3. Are there other documents being used by the USFS to inform their decision making process for the Mammoth Lakes Basin, such as the Forest Plan for the Inyo National Forest?

Proposed Action

The INF proposes to authorize, under special use permit to the TOML, the construction and maintenance 0.75 miles/3850 feet of multiple use path/trail to Trail Development Class 5 standards (high level of development). The new trail would begin at the "Pokenobe" intersection of Lake Mary Road and travel on the west side of the road towards the "Lake George/Lake Mary" intersection, crossing the Lake Mary outlet adjacent to the existing bridge, just below the spillway. The trail would continue by crossing the Lake George Road at the intersection and climbing the north facing slope below the Lake George Campground, ending at the road just below/north of the stop sign in the Lake George parking lot and Crystal Lake trailhead. A short spur would connect back to the Lake Mary Road for those traveling around the "Lake Mary Loop." The entire trail would be paved and approximately ten feet in width with pullouts for users to rest and to provide opportunities for interpretive and educational signs. Benches would be placed in pullouts. At both termini, trailhead kiosks and 20'x20' kiosk plazas would be constructed to orient visitors and allow users to gather. The kiosk plaza at Lake George would include bike racks for those wanting to bike to the trailhead, secure their bicycles, and continue on foot along one of the several area trails. Adjacent to the kiosk plazas, picnic tables and other day use infrastructure will be placed to accommodate the anticipated recreation use. The shoulder of the road near the Lake George stop sign would be widened at the crossing to accommodate bicycle and pedestrian traffic. (COMMENTS #8)

COMMENTS #8 – “LAKE MARY ROAD TO LAKE GEORGE ROAD MULTI USE PATH”

1. What agency(s) will be responsible for budgeting, construction and maintenance of the proposed facilities? How will the roles and responsibilities be defined?
 - i. What is the anticipated funding source for the construction of the project?
 - ii. What is the anticipated funding source for the maintenance of the project?
 - iii. What is the anticipated funding source for the development, implementation and maintenance of the information systems for the project? (Wayfinding, Interpretive MLTS website, etc) ?
2. Will the Special Use Permit (SUP) be amended onto an existing SUP, or will it be a new SUP?
3. What are the opportunities to include conduit for the distribution of fiber optical cable as part of the project construction? Will this need to be analyzed through NEPA?
4. Conformity with the “Trail System Master Plan”, TOML Public Works Standards, and the “Mammoth Lakes Trail System” MOU: Will the project conform to recommendations from the Town’s “Trail system Master Plan (TSMP)”?
 - i. For example, on the subject of MUP Width, Design Guideline 6.1 recommends the following with regards to width:
 1. 10 feet is required by the Town of Mammoth Lakes as the minimum width of new multi-use paths. This requirement exceeds existing standards and will be adequate for moderate to heavy use. This provides an unobstructed right-of-way wide enough to accommodate typical trail grooming equipment. However, shoulders wider than two feet should be considered in areas that will receive regular winter grooming.
 2. 12 feet is recommended for heavy use areas with high concentrations of multiple users such as joggers, bicyclists, rollerbladers and dog walkers. May also be appropriate for safety reasons in areas with limited sight lines or where speeds may be high (steep grades).
 3. The 10’ minimum clearance should be exceeded as necessary to account for winter snow pack.
 - ii. Will all aspects of the information program for the project, including “Kiosk Plazas” + signage and wayfinding, conform to MLTS standards as adopted by TOML in their Public Works Standards Manual and as indicated in the “Mammoth Lakes Trail system” MOU?
5. Several existing winter trails of the “Tamarack Cross Country Ski Center” should be analyzed for their integration into the proposed projects as it appears that there may be significant consequences should these winter trails not be properly considered. These trails include:
 - i. “Mamie Cutoff”
 - ii. “Watertank”
 - iii. “Voodoo”
6. Have new opportunities for the winter trails of the “Tamarack Cross Country Ski Center” been considered for integration into these project proposals?

7. Please provide further detail and analysis for potential the construction alternatives at the intersection of Lake Mary Road and Lake George Road with specific regard to “widening of the shoulder”

COMMENTS #8 – “LAKE GEORGE PATH PROJECT”

1. Alignment alternatives should be developed for the proposed MUP including an alignment running to the west of Lake George Road as well as just to the east of Lake George Road.
2. Analysis of project alignment alternatives need to include the “Voodoo” winter trail of the “Tamarack Cross Country Ski Center” which is currently in the project area and may be impacted by the proposed project.
3. The southerly termination of the “Lake George Path Project” as proposed should coincide with the existing bathroom on the north side of the Lake George Parking area and not at Lake George Road as indicated in the project map.
4. Should the proposed project succeed at its goals to “... reduce pedestrian/vehicle conflicts within the project area and encourage users to travel on foot or bicycle to visit one of the premiere destinations within the Lakes Basin...” it is reasonable to assume that the Lake George area and all of its emanating trails will be affected. Mitigation measures should be identified and implemented along with the proposed project to bring existing heavily used use trails including those around Lake George and up to TJ Lake into conformance with USFS soft surface trail standards. This includes use trails that currently exist in riparian areas. Trail counter data for the Lakes Basin Path over its first several years of operation should used as part of the analysis of anticipated usage for a new MUP to Lake George.
5. To help mitigate anticipated additional usage and visitation at Lake George, enhanced public transit options should be deployed.
6. Funding sources for the various mitigation measures as identified above need to be identified as part of the NEPA analysis.

The proposed trail would take over the alignment of existing day ride trails used under special use permit by the *Mammoth Lakes Pack Outfit*. As a result, the day ride trails will be relocated, necessitating the reconstruction of 0.35 miles of class 2 (low level of development) trail and amendment of the special use permit to include the newly added trails. In addition, boulders, logs, and other obstacles will be placed along the paved multiple use path, adjacent to existing roadways, and in other locations required to keep bicycles from riding on trails used by commercial pack stock. (COMMENTS #9)

COMMENTS #9

1. Where will the equestrian trails of the “Mammoth Lakes Pack Outfit” be re-located? Have their alignments been identified?
2. It is not clear why the trails of the permittee identified as the “Mammoth Lakes Pack Outfit” have been identified for specific consideration, while the trails and facilities of other permittee in the project area have not, including the winter trails of the “Tamarack Cross Country Ski Center”. Rationale should be provided for this distinction.
3. More information should be provided re: “... boulders, logs, and other obstacles (to) be placed along the paved multiple use path, adjacent to existing roadways, and in other locations required to keep bicycles from riding on trails used by commercial pack stock...”. Is this consistent with the design features used in the Lakes Basin Path and with the Town’s adopted public works standards?

Along the Lake Mary Road, in front of the Lake Mary Campground, construction of the proposed trail will require realignment of the existing road. The existing road was constructed in manner that created a gentle bend and narrowing of the road corridor to climb a slight hill and use natural terrain features. The realignment of the road will serve both purposes of accommodating the newly constructed multiple use path and improving vehicle safety along the road corridor. (COMMENTS #10) The U.S. Forest Service proposes to issue to the TOML a ten year permit to maintain up to nine miles of publicly traveled roads within the Lakes Basin, including this section of road that will require realignment. Issuance of a multi-year road maintenance permit will, over time, help TOML and the INF collaborate and leverage funding to repave and maintain the public road network within the Lakes Basin and seek funding to support trail development, safety enhancements, and continued delivery of public transportation infrastructure.

(COMMENTS #11)

COMMENTS #10

1. Will there be any effects on the campsites at the campgrounds should the road be realigned?

COMMENTS #11

1. What are the specific roads identified for a "... ten year permit to maintain up to nine miles of publicly traveled roads within the Lakes Basin, including this section of road that will require realignment"? These roads should be identified by name and with GIS data
2. Analysis is needed to further understand the substance of a future relationship between the TOML and the USFS with regards to road maintenance, ie, what are the specific opportunities for additional funding? What might the roles/responsibilities and liabilities look like in the future? What are the opportunities to enhance the value of the Mammoth Lakes Basin for local residents and visitors alike?

Trail construction and road realignment will require the removal of approximately 85 small to moderately sized lodgepole trees, with the majority of the trees required to be removed less than 12 inches diameter at breast height. The trail alignment has been designed and engineered to minimize tree removal and to avoid removal or impacts to any of the Western White Pine trees that grow within the project area.

How you can give input

This letter initiates the public involvement (scoping) part of the NEPA process. The U.S.F.S seeks your comments on the *Pokenobe to Lake George Multiple Use Path Trail Construction project*. Scoping comments will be used in analyzing the effects of, and possibly altering, the proposed action. They may also be used to develop mitigation or conservation measures in supplement to the proposed action.

Comments on this project may be submitted by telephone, electronically, or through the mail. Electronic comments are preferred. They should be sent to jkazmierski@fs.fed.us. They need to be in message, text, .doc, .rtf, or .pdf format. Mailed comments should be sent to the District Ranger Jon Regelbrugge at the address listed in the header of this letter. For comments by telephone, contact Jon Kazmierski at 760-924-5503. Comments received in response to this letter, including names and addresses of those who comment, will be considered part of the Project Record and available for public review. Comments received within 30 days of the date of this letter are the most helpful and most likely to be considered in the analysis of this project.

I will be the Responsible Official for this project. Upon completion of the environmental review, I will decide whether or not to authorize the activities proposed in the *Pokenobe to Lake George Multiple Use Path Trail Construction project*. I expect that this project will be categorically excluded from documentation in an environmental impact statement or an environmental assessment because it will qualify for exclusion under Code of Federal Regulations (CFR), Title 36, Section 220.6 (e) (1): *Construction and reconstruction of trails*, and CFR, Title 36, Section 220.6 (d) (4): *Repair and maintenance of roads*. Therefore, when the U.S.F.S. completes the project analysis it likely will be documented, along with my decision and rationale, in a Decision Memo. Updates and additional documents will be posted on the Inyo National Forest website at: www.fs.usda.gov/projects/inyo/landmanagement/projects. (COMMENTS #12)

For more information about this project, please contact Jon Kazmierski, District Recreation Officer, at jkazmierski@fs.fed.us or at the above-listed phone number.

The USDA Forest Service no longer offers a formal notice, comment, or appeal opportunity for categorically excluded projects under 36 CFR 215. This is the case as of March 5, 2014, per Pub. L. No. 113-76, Section 431 and Pub. L. No. 113-79, Section 8006, and a directive from U.S.F.S. Chief Thomas Tidwell. A final rule, published in the Federal Register July 29, 2014, formally removed 36 CFR 215 and amended 36 CFR 218 to clarify that categorically excluded projects documented with Decision Memos no longer have formal notice and comment or appeal periods. The INF will continue to offer public involvement opportunities for categorically excluded projects or activities as required by the agency's NEPA procedures. (COMMENTS #13)

I appreciate your interest in this project and in the management of the Inyo National Forest.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Gelbrugge". The signature is written in a cursive style with a large initial "C".

C GELBRUGGE

District Ranger

Enclosures: Vicinity maps, Project maps (Five pages)