



**Town of Mammoth Lakes**

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March 5, 2015

Jon Kazmierski  
Inyo National Forest  
351 Pacu Lane Suite 200, Bishop, CA, 93514  
[jkazmierski@fs.fed.us](mailto:jkazmierski@fs.fed.us)

Re: Inyo National Forest Request for Comments  
Lakes Basin Paved Path - Lake George Connector #45541

Dear Jon,

Thank you for this opportunity to comment on the Inyo National Forest's proposed NEPA Process. The Town of Mammoth Lakes appreciates the continued working relationship between the Town, the Forest Service and other area partners. This relationship is long standing and includes a long list of guiding and informing documents.

We recognize the proposed projects appear to be in keeping with the 1988 Inyo National Forest Management Plan, specifically for Management Areas #8 and #9. Among other items, specific to Management Area #8, Mammoth Escarpment, the Management Area Direction notes:

*Recreation*

- *Develop recreation composite plans to inventory, coordinate, and program the full summer and winter recreation potential in the area in Prescription #12 (Lakes Basin). Construct programmed facilities as funds become available.*

We reference that Recreation section for several other statements, not restated here, that also serve to provide a solid basis for the proposed projects as well as the overall approach to management of resources in the Lakes Basin. We also reference the Mammoth Lakes Trail System MOU as a guiding document for these discussions.

Please accept the following as our comments in direct response to the items listed in your request for comments and the scoping letter:

USFS Press Release/Request for Comments:

1. USFS: The new, paved path would travel from the Pokonobe intersection of Lake Mary Road, across the Lake Mary outlet, up to the Lake George parking area, and would include a short spur to connect users back to the Lake Mary Road.

Town Comment: We have reviewed and have no comment on the first portion of the alignment from Pokonobe to Lake George Road, except to note that we will work with you to ensure other existing uses and trails are accommodated to every reasonable extent. For the second portion, we look forward to the opportunity to continue working with USFS on refinements related to final trail alignments and possible other amenities including, but not limited to parking areas, turnouts, bridges, walls, drainage facilities, signage and picnic areas. We would like additional information as to what other alignments may have been considered for the second portion of the path (Lake George Road to Lake George, including return to Around Lake Mary Road – aka Lake Mary Loop). We are also extremely interested in the final design considerations of the nodes/intersections where the greatest potential for conflict and impacts to other facilities exists.

USFS: To facilitate path construction and improve visitor safety, the forest proposes to authorize these additional actions:

2. USFS: Realignment of approximately 1/16th of a mile of Lake Mary Road, north of the Lake Mary outlet.

Town Comment: No comment.

3. USFS: Relocation of 0.35 miles of soft-surfaced trails used under permit by *Mammoth Lakes Pack Outfit*.

Town Comment: This appears appropriate. We look forward to reviewing the final alignment when it becomes available, especially where the proposed MUP near Lake George outlets onto Lake George Road near the noted trail. Review of any conflicts with other trails under use permit(s) should also be undertaken.

4. USFS: Restoration of approximately one acre of user created trails.

Town Comment: This appears appropriate. We look forward to reviewing the final details regarding which trails are to be restored.

5. USFS: Placement of boulders, logs, and other obstacles along and adjacent to the newly constructed path and adjacent to the Lake George Road.

Town Comment: No specific comment, except to state potential conflicts with other existing uses should be considered.

6. USFS: Issuance of a ten-year special use permit to the Town of Mammoth Lakes to maintain public roads within the Mammoth Lakes Basin.

Town Comment: Town has executed the Special Use Permit for a one year period, plus a ten year extension should the Town continue to be involved with road maintenance in the area with the understanding that participation is dependent on mutually acquired funding.

7. USFS: The proposed trail project has been designed and engineered to minimize tree removal, to avoid removal or impacts to any of the western white pine trees that grow within the project area, and to avoid and mitigate other potential resource impacts.

Town Comment: No specific comment on resource protection. If construction allows, Town is interested in the potential to add “empty conduit” under or adjacent to the trail to allow for future connectivity.

Scoping Letter:

8. Project Location: Town Comment: The Town understands the location of the proposed project. We look forward to continuing to work with USFS Staff on refinements to the final trail alignments and possible other amenities including, but not limited to parking areas, turnouts, bridges, walls, drainage facilities, signage and picnic areas. We would also like additional information as to what other alignments may have been considered for the second portion of the path, Lake George Road to Lake George, including the proposed return to Around Lake Mary Road (also known as Lake Mary Loop Road). In addition, we ask that USFS Staff provide additional clarity as to the reasoning for including the second portion of the path at this time. To the extent the completed path places more visitors in the Lake George area, mitigation measures should be considered for the dispersion of users in the area.
9. Purpose and Need: Town Comment: The Town agrees with the purpose and need stated, especially considering the volume of equestrian, pedestrian, bicycle and vehicle traffic in the area. We ask that consideration be given to ensuring the design and implementation of the plans for the area include a complete visitor experience and that impacts to other existing and future paths and features be considered.
10. Proposed Action: Town Comment: No specific comments. We do, however, need to continue to emphasize that design of proposed trails and other improvements should take into account potential impacts to other existing and planned features, including existing trails. Please refer to comments above related to alignments and amenities. Consideration should be given to identification of available funding sources for additional enhancements that may serve to mitigate potential impacts such as additional traffic of all types and unavoidable conflicts between various users.

Thank you for this opportunity to provide our comments. We look forward to working with you on this exciting project.

Sincerely,

Jo Bacon  
Mayor