



## Memorandum

**TO:** Ellen Clark  
**CC:** Jay Ziff  
**FROM:** Mike Harden  
**RE:** **MAMMOTH TSMP EIR – SHARP PRIORITY PROJECTS: BIOLOGICAL AND CULTURAL RESOURCES ANALYSIS**

**DATE:** November 12, 2010

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As stated in the Initial Study prepared for the project, it is the intent of the EIR to analyze nine (9) Priority Projects at a “Project-level” to reduce or avoid the need for subsequent environmental review, understanding the goal of implementing at least some of the Priority Projects as early as 2011. While PCR’s scope of work for the EIR assumed that technical studies addressing biological and cultural resources would be available to support the evaluation of the Priority Projects in the SHARP area, recent coordination with USFS indicates that full survey coverage for these projects is not available. And, while completion of supplemental surveys for the SHARP area was recently considered, it was recognized that conducting the surveys prior to release of the Draft EIR would cause a major delay in the project schedule. Accordingly, PCR is proposing an approach to the analysis of biological and cultural resources that will maintain the anticipated schedule of releasing the Draft EIR for public review in Spring 2011, without sacrificing the adequacy of the document and its basic utility in reducing the need for subsequent environmental review.

At the highest level of detail, a “project-level” analysis of biological and cultural resources impacts would involve a complete field review and reconnaissance of existing conditions, including focused surveys for potential sensitive species (plant and animal) regarding biological resources. Because not all of the Priority Projects have been surveyed, providing such an analysis for the Priority Projects would likely require focused surveys during Spring 2011 and possibly Summer 2011, which would push back release of the Draft EIR to Summer 2011 or possibly Fall 2011. This schedule would likely preclude any potential for the Priority Projects to be implemented during 2011.

To date, PCR has received various biological-related studies and anticipates additional biological and cultural studies that will allow the EIR to analyze the majority of the Priority Projects at a high level of detail. Based on review of the existing information provided to PCR and a recent general field reconnaissance, it appears that those Priority Projects in the SHARP area that have not been surveyed occur in areas that are similar in setting and habitat to those Priority Projects with detailed information. Accordingly, we are confident we will have enough relevant information to adequately assess and identify potential impacts on biological and cultural resources for all of the SHARP Priority Projects. Although the specific resources and extent of impacts may not be known for some Priority Projects, the types of impacts that could occur can and will be identified. In addition, mitigation measures will be developed to cover “if-then” scenarios, with specific performance standards incorporated to ensure that the utility of the measures can be predicted and that charges of improper deferral of mitigation can be defended. In the event focused plant or animal surveys and cultural resources surveys are conducted in Spring 2011, the results of the surveys may still be feasible to incorporate into the Final EIR.

If this approach is acceptable to the Town, PCR will proceed with the EIR assessment of biological and cultural resources based on available information and information anticipated to be provided within the upcoming weeks.