



November 27, 2007

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Re: Mammoth Mountain Proposed Ski Back Trail

Mammoth Lakes Trails and Public Access Foundation (MLTPA) appreciates the opportunity to provide input on the draft Environmental Assessment (EA) concerning Mammoth Mountain Ski Area's (MMSA) proposed Ski Back Trail in Mammoth Lakes, CA.

Overall, MLTPA supports the Ski Back Trail. We feel that the project will help to alleviate congestion in a heavily-used portal of the ski area and improve ski area guest mobility, particularly at the conclusion of a ski day. Once guests have incorporated the use of the Ski Back Trail into their end-of-day routine, benefits in circulation both at the ski area and in the Town of Mammoth Lakes should be apparent. There are several details that MLTPA urges the Forest Service to pay close attention to in order to ensure that trail construction is performed in a manner that gives priority to safety, connectivity, and environmentally sound practices, though.

We offer these comments from our area of expertise. MLTPA is the recognized authority on trails and public access issues in the Mammoth Lakes area. From our inception, we have been a leader on the research and discussion of these issues. We prepared the 2006 GIS/GIC inventory report of trails and public access points in the Mammoth Lakes area and presented a public meeting and strategic conference in the fall of 2006 that attracted a standing-room-only crowd of close to 5% of the town's permanent population. We participated in the Sensitive Lands and Open Space Resources Committee; the 2007 Town General Plan update via public comment and as member of the Community Stakeholders' Group, serving with the Snowcreek VIII applicant; and in the last year, initiated MLTPA CAMP (Mammoth Lakes Trails and Public Access Concept and Master Planning), a multi-partnered, multi-jurisdictional effort (Town of Mammoth Lakes, Mammoth Mountain Ski Area, United States Forest Service) that has brought nationally-recognized trail and outdoor recreation consultants to Mammoth Lakes to update existing trails planning. The MLTPA CAMP process has included significant partner financial contributions. The Town of Mammoth Lakes has recently adopted a Memorandum of Understanding with MLTPA and other partners intended to further the efforts of trails and public access planning in the Mammoth Lakes area.

The draft EA for the Ski Back Trail thoroughly covers those elements pertinent to the project as required by the National Environmental Policy Act (NEPA). Areas of concern for MLTPA are the re-establishment of the Uptown and Downtown mountain bike trails, the retaining wall construction, and the timing of the construction of the bridge over Forest Trail.

Re-establishment of the Uptown and Downtown Mountain Bike Trails

Both the 1987 General Plan (Policy 2C-1) and the 2007 General Plan Update (M.4 Goal) emphasize the importance of an effective trails network, stating that:

Policy 2C-1: The Town shall establish an effective trails network which connects frequently-used destinations and follows heavily-traveled routes. Trails shall be established whenever possible: 1) along scenic routes, 2) between recreation and visitor nodes, 3) to public facilities, areas of cultural, educational, recreational and historic interest, and 4) to campgrounds, camping areas, forest and wilderness areas.

M.4. GOAL: Encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive.

Because Uptown and Downtown were designed and constructed prior to the more-mature trail design standards available now, many parts of the trail are not as sustainable as they could be. Construction of the Ski Back Trail will offer the chance to improve these popular trails. A re-design of the bottom of both trails that would prevent the current situation of riders having to enter Uptown / exit Downtown just after a sweeping blind right-hand turn on busy Highway 203 would be especially welcome.

MLTPA also urges the consideration of allowing bikers to use the Ski Back Trail during mountain biking season. Although most bikers will prefer the singletrack experience on Uptown and Downtown, the wider width of the Ski Back Trail would allow hand-cycles and other human-powered vehicles used by disabled bikers to utilize this trail corridor.

Retaining Wall Construction

MLTPA recognizes that MMSA has decades of experience in sound trail and retaining wall construction; however, the Ski Back Trail draft EA doesn't clearly address the retaining wall construction. Specifically, mention is made of six steep areas of the trail, but only four rip-rap walls and one soil-nail wall are referred to. We also encourage consideration of the effect that these walls and the change they induce on snowmelt flow may have on Uptown and Downtown.

Bridge over Forest Trail

MLTPA is aware that the design and construction of the bridge that will connect the Ski Back Trail, on Forest Service land adjacent to a privately-held land parcel, to the Village, also on private land, will be analyzed under the California Environmental Quality Act (CEQA) with the Town of Mammoth Lakes as the Lead Agency. However, little is stated of the connected action of the bridge to the Ski Back Trail. Although the analysis under CEQA will be performed separately from the Ski Back Trail federal process, the bridge remains a connected action critical to the Ski Back Trail project. No mention is made in the EA regarding the timing of the bridge environmental analysis and the opening of the Ski Back Trail. If the trail is approved and constructed, but the bridge project is delayed, then there will be no safe crossing for guests to return to the Village from the trail. We feel that for safety and accessibility, the EA

should disclose the dependency of the two projects and the decision document should require approval of the bridge project prior to construction of the Ski Back Trail.

Thank you again for the opportunity to comment.

Sincerely,

MLTPA Board of Directors