



September 10, 2008

Ellen Clark, Senior Planner
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Subject: Mammoth Crossing Draft Environmental Impact Report (SCH
#2007112002)

Dear Ms Clark,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Mammoth Crossing Project. Consistent with our mission, the Mammoth Lakes Trails and Public Access Foundation (MLTPA) has reviewed the DEIR for its discussion of impacts to trails and recreation resources. Our comments below reflect that review.

1. Figures III-14 and 15, Pedestrian and Bicycle Circulation Maps. These maps are very conceptual in nature and do not clearly depict the existing and proposed circulation. The Lake Mary Multi-Use Path (currently under construction) is not depicted on either figure. The bicycle and pedestrian connections along Canyon Blvd. to the Village, a major destination for both user groups are not shown. Also, the reference to bicycle paths should be clarified as paths are different from lanes or routes. It would be helpful to understand which type of facility is proposed in which location and whether these are part of the Town's bicycle plan or are changes proposed by the applicant. Without the specific representations of these facilities and plans, it is difficult, and technically impossible, to provide commentary on the Draft EIR. Please provide the location of the Lake Mary path, the connections to the Village and the project's changes to existing Town facilities and plans so that these facilities and uses, along with MLTPA's comments, can be included in the Final EIR.
2. Mitigation Measure AES-5. Conditions other than black ice may necessitate heat tracing of the roadway and pedestrian ways. Please replace "i.e." with "e.g." This lets the Town address a variety of icing conditions.
3. Section IV-M. The proposed bicycle and pedestrian circulation design has the potential to substantially increase hazards to cyclists.

While the location of the Lake Mary Multi-use Path is not included on Figures III-14 and 15, it appears that the interruption of the bicycle circulation between town, the Village, and the Lake Mary path has the potential to put riders into a conflict with either cars or pedestrians. Because the graphic representations

of the proposed routes are so imprecise, and no routes are shown on Canyon Blvd, it is difficult to evaluate potential conflicts.

The Lake Mary Multi-Use Path will begin at Minaret Road and traverse the project frontage as it proceeds west along Lake Mary Road. It is designed as a Class 1 path with a separation from vehicle traffic and is expected to be a major recreational attraction when completed. The project graphics appear to propose giving cyclists the choice of passing between the travelled way of Lake Mary Road and parked cars or following a sidewalk between the roadside parking and the buildings. Many users of the Mammoth Lakes Trail System are casual recreational bicyclists, including families, not used to negotiating traffic and parked cars or dismounting and walking for a block or more.

The proposed project appears to increase hazards for cyclists and possibly for pedestrians by creating a transition from a class 1 path to a class 3 route at a location that is one of the busiest intersections in the town and a hub for bicycle access to the Lakes Basin and MMSA. The text neither describes this transition nor evaluates alternative designs through the project.

MLTPA does not agree that requiring cyclists to dismount and walk their bicycles across the project is an appropriate mitigation measure in an area that is heavily used by cyclists heading to and from the Lakes Basin, Mountain Bike Park, and other destinations. We suggest that users attracted to the Lake Mary path and the bike park shuttle will be confused by the need to shift to walking or riding between parked cars and traffic. Therefore, it appears that the threshold of significance established in the CEQA Guidelines has been crossed and a more thoughtful design, perhaps continuing the class 1 route all the way to Minaret Road, should be provided. Please provide more information in the Final EIR on the bicycle paths, lanes, and routes (existing, planned, and revised) entering and exiting the project area and the integration of that traffic with the other modes and facilities.

Thank you for considering our comments. Mammoth Lakes Trails and Public Access continues to offer our services to the applicant and the Town to assure that the town's multi-modal transportation system is successful and provides maximum utility to the project, its residents and guests, and the community. We look forward to a productive public review process as the project proceeds.

Sincerely,

John Wentworth
Mammoth Lakes Trails and Public Access Foundation

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