



May 20, 2009

Town of Mammoth Lakes Planning Commission
Mark Wardlaw, Community Development Director
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546-1609

Subject: Snowcreek VIII Master Plan

Dear Commissioners and Mr. Wardlaw,

Thank you for the opportunity to provide comments on and suggestions for the proposed Snowcreek VIII Master Plan (SMP). Our notes are based on the Final Snowcreek Neighborhood District Plan (NDP) and the Town of Mammoth Lakes General Plan (GP). It is our hope and intention to provide suggestions that will help the Town and the applicant achieve a positive and profitable outcome that will result in a successful project.

We understand that review of a proposed Development Agreement will follow as a separate process, and we will hold our comments on the Development Agreement until that time. Please advise MLTPA if our understanding of the consideration of a Development Agreement as a separate process is incorrect.

MLTPA has three primary goals for the Snowcreek Master Plan:

- 1) **ACKNOWLEDGEMENT OF AND LEGAL STANDING FOR CURRENT AND EXISTING RECREATION USES:** Current and existing recreation uses that transect project property must be addressed by the SMP and legal passage must be provided for current and existing uses upon approval of the SMP. These include, but are not limited to, access/egress from the winter terminus of Sherwin Creek Road to USFS land and access/egress from the existing Ranch Road easement to USFS land.
- 2) **SNOWCREEK VIII TRAILS PLAN:** Prior to approval of any tract map, use permit, or grading permit, a trails plan for Snowcreek VIII must be submitted to and approved by the Town. This will assure that non-motorized circulation is integrated into the project design and is not undertaken as an afterthought. Facilities proposed by the Snowcreek VIII Trails Plan should be consistent with the design guidelines of the final draft of the Trail System Master Plan 2009 (TSMP). The TSMP does not provide for trail-system design within neighborhood districts, which was intentional; trail-system design is left to individual district-planning efforts. To comply with the General Plan goal of "...an integrated trail system that will maintain and enhance convenient public

access to public lands from town,” the Snowcreek project must provide its own internal trails plan with identified connections to the Town system and to national forestland.

It should be noted that while the TSMP has not been formally adopted, it was developed with substantial public involvement and professional analysis. In adopting the SMP, it is appropriate for the Town to rely on the information, analysis, and design guidelines presented in the TSMP.

- 3) **SNOWCREEK VIII TRAILS PLAN IMPLEMENTATION:** Coordinated phasing of the implementation of trails and pedestrian infrastructure in the approved Snowcreek VIII Trails Plan must be linked to project construction to ensure adequate and appropriate project and public circulation during implementation of the approved SMP.

Our specific comments on the SMP are as follows. Please be advised that where MLTPA comments suggest changes to text that occurs in multiple places in the document, the comments apply to all occurrences of the referenced text whether individually cited or not.

	Recommended Change	Reference
1.	Page 1-1, Footnote. Delete the word “only.” The implication of this word is that the NDP does not play a significant role in the review of the Snowcreek VIII project. As an advisory document prepared with substantial public involvement and cost to the applicant, the Neighborhood District Plan (NDP) is second only to the General Plan in advising the decisions of the Town regarding its discretionary legislative actions. The adoption of a Master Plan sets the development standards for the subject property, and the information that the Town may and should consider informs adoption of zoning. As a distillation of public involvement and professional analysis, the NDP is an important foundational document for developing the zoning of the Snowcreek area and its role should not be minimized.	
2.	Page 1-2. The document refers to the “outfitters cabin” as meeting a community need. The community use of the outfitters cabin is never described, and it appears that it is a rental shop. Please delete from the sections where it is included in community benefits or needs.	
3.	Page 1-4. The first paragraph under “Principle Characteristics” says that the “[p]arcels south of Old	

	<p>Mammoth Road most recently have been used for cattle grazing.” While it is not clear which parcels are being referred to, no cattle grazing has taken place in the immediate vicinity of the project site for decades. This section should list all recent and current uses—including, but not limited to, winter backcountry egress, cross-country skiing, and the driving range—whether formally authorized or not.</p>	
4.	<p>Page 2-3 (e). This paragraph refers to “paths”. The SMP should clarify its terminology when referring to paths, trails, etc., and use the nomenclature and definitions of the Trail System Master Plan 2009. This will eliminate confusion over the location and design of different levels of non-motorized circulation infrastructure. This section should include maintenance of public access to and egress from national forestland. See also Comment 2.</p>	
5.	<p>Page 2-6, Figure 2.1. This figure should show a conceptual location for project and public connections to the federal land to the south. All maps and figures should demonstrate consistency with the maps and figures from the NDP.</p>	<p>NDP Figures 6-2 and 6-3</p>
6.	<p>Page 2-7. This page describes density calculations and states that the Snowcreek VIII project proposes a total density of 990 units instead of the 1,185 allowed under the existing Master Plan. This information is incomplete and should clarify that the project site density is increasing from 863 units to 990 units while the overall Master Plan density is decreasing by 195 units. This increased density within the Snowcreek VIII project area increases the need for a non-motorized circulation system that is well designed and of adequate capacity.</p>	<p>Snowcreek White Paper, Town of Mammoth Lakes</p>
7.	<p>Page 2-11, first column, last paragraph. We disagree that the two processes are distinct. While approvals are not dependent on each other, the two projects interface with and inform each other. Connecting its residents and guests to the recreation resources of Inyo National Forest should be a major goal of the Snowcreek VIII Master Plan.</p>	<p>GPU policies P.3.A, P.3.B, P.3.C, P.5.B</p>
8.	<p>Page 2-11, second column. While we understand that a formal staging area or portal may require further analysis, we disagree that public and project access to Inyo National Forest should be “closed.” Currently there are no closures along any of the Town boundaries, and the lands around Town are</p>	<p>Inyo NF LRMP, GPU policy P.3.A, Snowcreek district description GP page 27</p>

	open for public recreational use. No federal or local policy document has proposed a closure. To do so would require additional environmental analysis and is inconsistent with the Town of Mammoth Lakes GP. The use of the word <i>portal</i> has implications under the TSMP. As with trails and paths typology, all trail-system feature nomenclature should be consistent with the definitions in the TSMP. See also Comment 4.	
9.	Page 4-1, second paragraph. Replace the words “possible portals” with “connections.” As discussed in Comment 8, the project must maintain connections to the surrounding public lands as well as future portals to connect with the recreation opportunities identified through the Sherwins Working Group (SWG)/Sherwin Area Trails Special Study (SATSS) process. Without those connections the project is inconsistent with the GP and the NDP. As in Comment 8, terms should be used consistently and as defined in the TSMP.	GPU policies P.3.A,P.3.B, P.3.C, P.5.B
10	Page 4-2 (i), last sentence. Delete the words “onto the golf course paths.” These may or may not be the best routes for meeting winter user needs and project needs. This egress should be addressed in a Snowcreek VIII Trails Plan, as should the final number of access/egress points and the degree of development of those points.	
11	Page 5-5. Under “Multi-Use Paths for Walking, Bicycling, and Hiking,” include connections to existing and future recreation on national forestland.	Policy P.3.A
12	Page 5-11, third item under “Features.” Add “and national forestlands” after “existing town trails.”	Policy P.3.A
13	Page 5-12. Add “recreational trails” under “Recreation Land Use Includes.”	
14	Page 5-12, last paragraph in “Egress from Sherwins.” Delete “to the closest publicly accessible point.” While the closest publicly accessible point may turn out to be the best destination, the detailed trails planning for Snowcreek VIII should also consider multiple routes, access to transit, access to Snowcreek commercial services, and other considerations.	
15	Page 5-21, second paragraph. The text refers to a portal being shown on Figure 5.6. That figure does not, but should, show an access point. As noted above, the term <i>portal</i> may not be appropriate and	

	<p>should be referred to as an access/egress point. The final design as a portal, staging area, or other access/egress point type should be based on the results of the SWG/SATSS process and the Snowcreek VIII Trails Plan. The last two sentences of this paragraph should be replaced with "One other access point on the project site, shown on figure 5.6, will be publicly accessible year-round." See Comments 4, 8, and 9.</p>	
16	<p>Page 5-22, Figure 5.5. This figure should include a connection to national forestland to the south and possibly to the east. For clarity, it should also show the public facilities on the perimeter of the project site that the project will connect with, e.g. the Main Path of the Mammoth Lakes Trail System.</p>	<p>NDP Figures 6-2 and 6-3, GP policy P.3.A and Snowcreek district description GP page 27</p>
17	<p>Page 5-23, Figure 5.6. Show connections to the public lands to the south and the east per the NDP winter recreation map.</p>	<p>See Comments 14 and 15.</p>
18	<p>Pages 7-3 and 7-4, Figures 7-2 to 7-4. The 8-foot multi-use path (MUP) is not wide enough for the volume of pedestrian and bicycle traffic on the MUP. MLTPA recommends a minimum width of 10 feet, with 12 feet in areas of high traffic, per AASHTO standards and the TSMP.</p>	<p>Guide for the Development of Bicycle Facilities. AASHTO, 1999</p>
19	<p>Page 7-6, Figure 7.6. Again, a conceptual access/egress route to connect to the public lands to the south needs to be identified here, and public facilities on the project perimeter should be shown (see Comment 16). The widths identified are inadequate, as described in Comment 18.</p>	<p>NDP Figures 6-2 and 6-3, GP policy P.3.A and Snowcreek district description GP page 27</p>
20	<p>Page 7-7, Figure 7-7. This figure should indicate potential for access to/egress from public lands from the snowplay area.</p>	
21	<p>Page 7-11, Figure 7.9. See Comment 18.</p>	
22	<p>Phasing. The internal trail system needs to be constructed in a sequence that permits access from each phase of development to major destinations, including Mammoth Creek Park and points north, the Old Mammoth Road/Minaret Road intersection and the Main Path of the Mammoth Lakes Trail System, and future facilities to the south and east on national forestland.</p>	
23	<p>Snowcreek VIII Trails Plan. We suggest that the SMP include a requirement that, prior to the approval of the first tentative tract map, parcel map, grading permit or use permit within Snowcreek VIII, the</p>	

	applicant prepare and have approved by the Town a trails plan for the project area. This will assure that the trail system is fully integrated into the project planning and is not an afterthought.	
24	Permitted and Conditional Uses. The SMP does not include a list of permitted and conditional uses. Therefore, MLTPA understands that the direction of the Resort Zone regarding permitted and conditional uses will be controlling.	

Thank you again for the opportunity to participate in the review process for the Snowcreek VIII Master Plan. We look forward to the adoption of the SMP and continue to offer our services to assist in implementing a final project that provides the greatest opportunities for success for both the project guests and owners and the community of Mammoth Lakes.

Sincerely,

John Wentworth
Mammoth Lakes Trails and Public Access Foundation