



Terri Simon-Jackson, Acting Forest Supervisor
c/o Janelle Walker, Winter Sports Specialist
Inyo National Forest
PO Box 148
Mammoth Lakes, CA 93546

August 18, 2017

Submitted via email to: janellewalker@fs.fed.us and on project website

Re: Mammoth Base Land Exchange EIS

Friends of the Inyo (FOI) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) that analyzes the Mammoth Base Land Exchange. Because of the potential management implications to public lands in Mono County, we are pleased the USFS has chosen to conduct an EIS for this project as suggested in our 2016 scoping comments.

We are concerned, however, that the DEIS lacks an analysis of potential impacts to public lands associated with the Mammoth Mountain redevelopment project. The DEIS does not include an analysis of the environmental impacts of all actions connected to the proposal, specifically, the redevelopment of Mammoth Mountain Ski Area (MMSA). As a result, in the EIS's current form, it is difficult to understand the true effects and overall impact of the proposal. We understand the redevelopment will be subject to CEQA and the Town of Mammoth Lakes review. We are concerned that CEQA may not adequately address the impacts to public lands. As a result, it is more appropriate to analyze these impacts through the DEIS.

While Friends of the Inyo generally supports the acquisition of public land within Mono and Inyo Counties as a benefit to the public, water resources and wildlife, and recognizes that such acquisition requires trade-offs in the form of allowing development on what is currently public land, we are concerned the DEIS does not adequately address the recreational impacts of the current proposal.

First, we are concerned that recreational access provided via highway 203 beyond the ski area parking lot may be impacted by conversion of the MMSA parcel to private land. The area currently provides free parking and staging for summer and winter recreation on the INF and Devils Postpile National Monument. There are currently no agreements associated with the land exchange between MMSA and INF that will ensure free, public access across all seasons to public lands west and north of MMSA. Without such an agreement, we are concerned that MMSA may attempt to impose parking fees, move parking to the paid parking area at the Village, or eliminate public parking all together. Alternatively, we believe INF should mandate reasonable public access, free parking and the creation of a convenient, public-access staging area as part of MMSA's Special Use Permit.

Surprisingly, the DEIS found no significant impacts to recreation on public lands adjacent to MMSA. Redevelopment will ultimately drive more visitors to MMSA and thus more visitors to the public lands both within and outside the SUP boundary. The DEIS must acknowledge the likely impact to adjacent public lands and discuss possible mitigation tactics such as the provision by INF of adequate facilities for a growing number of visitors, including reasonably priced or free of charge parking year-round.

Second, the redevelopment of the mammoth base parcel will mean a significant increase in human related impacts to wildlife, forest health, groundwater (discussed below), and the climate refugia of the San Joaquin drainage. Within the Final EIS wildlife impacts section, there should be a discussion of the wildlife corridor along the San Joaquin Ridge being adjacent to the Mammoth Base parcel. The redevelopment should be in line with the California Statewide Action Plan (SWAP), California Essential Habitat and Connectivity Plan (CEHC), and the Safeguarding California Plan.

Third, an important addition to the DEIS is the analysis of the economic impact to the USFS and particularly INF. MMSA currently furnishes a SUP fee to the Forest Service of 3.2 percent of all revenue generated from activities conducted on the Federal parcels and on NFS lands within the SUP boundary. After re-development, the SUP fee is predicted to increase because of projected increases in overall revenue. Unfortunately, the DEIS fails to state that this SUP fee goes directly to the US Treasury instead of the Inyo National Forest, therefore there is little economic benefit to the INF and thus the public. If there is an economic benefit to the agency, including staff capacity and resources, it should be clearly analyzed in the DEIS.

Fourth, the DEIS lacks a complete analysis of impacts to groundwater at Mammoth Mountain, although it does address groundwater *quality* monitoring. The impacts to groundwater are a major concern because redevelopment will create increased demands on water and could lead to over pumping of groundwater from both a higher number of visitors and changes in snowmaking activities due to climate change. A study recently published by USGS found the springs that feed the San Joaquin River from Mammoth Mountain to contribute significant amounts of water to the river in the fall. (<https://pubs.usgs.gov/sir/2017/5048/sir20175048.pdf>) We recommend that the USFS mandate the installation of groundwater monitoring wells at appropriate locations within and outside the SUP boundary (in addition to the sewage pond locations) and complete yearly groundwater monitoring reports. In addition, a cap should be placed on the amount of groundwater pumping allowed for the life of project. This could be in the form of pumping rates not to exceed rate of recharge or by similar method.

This would be in addition to the recommendations for the Sewage Ponds Parcel Phase I ESA to include soil and groundwater testing to identify any specific contamination that would require remediation prior to execution of the Proposed Action (DEIS pg.113). This is also consistent with Mono County Master Plan objective 4.A (DEIS pg. 186), although it is unclear in the DEIS whether redevelopment would be subject to TOML or Mono County jurisdiction. It is our understanding from conversations at the July 31st public meeting that future redevelopment would be under permitting from TOML and not Mono County. Such information should be clarified and corrected in the FEIS.

FOI is also concerned that the proposed action provides more land to MMSA, and less to the public, than the initial scoping. It is FOI's understanding that the additional acreage around the sewage ponds is required to facilitate MMSA's remediation of the ponds at a later date. This makes perfect sense, but the DEIS does not explain the intent. It was our first impression that the additional acreage would increase the overall footprint for future development. The EIS should be transparent about MMSA's intent for the sewage ponds. If it is indeed a buffer to allow for remediation at a later date this should be explained in the document. Further, to ensure the sewage ponds are not developed after remediation, the USFS should mandate a conservation easement for this parcel.

Fifth, section 3.7 contains an analysis of cultural resources but only includes information on five parcels already know to contain historic and prehistoric heritage sites. To be compliant with NEPA, cultural surveys are required on all parcels.

Additionally, we were deeply disappointed to see the removal of the May Lundy mine parcel from the DEIS. Although the USFS might feel the parcel is inconsequential in the overall acquisition, we believe this was a key parcel in the exchange because of its contiguity to the Hoover Wilderness, its opportunity for remediation, and its potential to be managed in the future to preserve its roadless character. Further details are needed as to INF management direction of acquired parcels. Recommendations for several parcels are described below:

West Mono Lake Parcel

Although the West Mono Lake parcel would be managed under the Mono Basin National Forest Scenic Area Management Plan (MBNFSAMP), the DEIS does not specify the particular land use designation. A search of Mono County databases reveals the land use designation as currently “unknown”. We ask the USFS to mandate the parcel be zoned “resource management” consistent with the MBNFSAMP prior to the exchange or immediately after closing.

Further, there is mention of moderate geothermal potential, but no mention of the policy within the Scenic Area Plan regarding development of that potential. Additionally, the DEIS discusses the removal of structures prior to the exchange but fails to provide for coordination with the Mono Basin Historical Society. The historic cabin could be saved for historical and educational purposes while the rest of the parcel remediated. Coordination is also needed with SCE to ensure public access via the main route into the parcel. Other roads not used by SCE such as the routes created by the Cunningham development need to be restored. In addition it would be prudent for USFS to require the removal of power lines associated with structures that are removed, consistent with a full remediation of the parcel.

Table 3.13-2 indicates there are no invasive species in this parcel (DEIS pg. 159). If this data is prior to the Marina Fire, invasive species surveys are needed again as cheatgrass could now be in the parcel. The DEIS should indicate what percentage of the parcel burned and describe how this will influence management objectives. These should be accompanied by potential restoration and mitigation actions with timelines and scopes of work.

Dexter Canyon II Parcel

Riparian and meadow parcels should be inventoried and added to existing Forest Service databases, then incorporated into existing monitoring plans and management prescriptions for comparable areas. The specific policies for the Glass Mountain management area applicable to Dexter Canyon II should be included in

the DEIS. The aquaculture ponds within the parcel should be removed in order to return natural flows to Dexter Creek. This would also be consistent with required remediation work and removal of structures in other parcels (Pine Creek, West Mono Lake). If the USFS does not require their removal, the EIS should contain a full evaluation of the condition of the ponds and their future management should they become federal land.

Pine Creek Parcel

The DEIS should describe potential management objectives. These should be accompanied by potential restoration and mitigation actions with timelines and scope of work. If the proposed action is approved, partnerships can be utilized where appropriate to address capacity issues with management implementation of this parcel. Trails within the pine creek parcel provide hiking opportunities but only .25 miles of trail exist within the parcel boundaries.

Moran Springs

Part of the Chidago Canyon Watershed, this parcel contains 3.8 acres of spring fed wetland, a rare occurrence on the east side of the INF. The riparian and wet meadow system should be inventoried and added to existing Forest Service databases, then incorporated into existing monitoring plans and management prescriptions for comparable areas. The specific policies for the Benton-Casa Diablo management area applicable to Moran Springs parcel should be included in the DEIS, as well as a reference to the RCAs under the revised land management plan. \$435.60 seems a reasonable cost to bring the existing roads within the parcel up to USFS standards and provide primitive and semi-primitive recreational access to the parcel, however the DEIS claims these routes are maintained by Mono County so clarification is needed as to who the responsible party would be for road maintenance.

Madden Property Parcel

Map 3.3-F should include the MMSA hiking and biking trail mentioned in the DEIS. If INF acquires this parcel it should fall under the SUP boundary for MMSA, if the INF decides the trail should be managed and operated by MMSA. Mono County generates \$21,000 a year in tax revenue from this parcel for a negligible amount of 2.7 acres. It is unclear whether the public would benefit from acquiring this parcel relative to the tax benefit to Mono County and the small size of the inholding.

DWP/Bishop Site

Under the proposed action the Forest Service would save \$9,520 per year by eliminating the lease payment for the DWP-Bishop administrative site. This is an economic benefit to the USFS and the public as these funds could be used for other

needed programs. There is also a benefit to USFS capacity and staff time when they no longer have to manage a lease with DWP. Furthermore, it makes good sense for the federal government to manage the land within and adjacent to their buildings and facilities.

Finally, should conditions change in the Eastern Sierra and MMSA property were to come up for sale, a first right of refusal agreement should be put into place between INF and MMSA so that the public can acquire this land once again.

Thank you for the opportunity to comment on the Mammoth Base Land Exchange DEIS. We trust the Inyo National Forest will make a decision that benefits public lands and the people and wildlife of the Eastern Sierra and should acquisition occur, appropriately manage these new public lands.

Sincerely,
/s/ Jora Fogg
Preservation Manager
Friends of the Inyo
jora@friendsoftheinyo.org