

1.0 INTRODUCTION/PURPOSE AND NEED

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1.1 OVERVIEW OF PROPOSED ACTION

Mammoth Mountain Ski Area (MMSA) proposes to construct a ski trail (the Ski Back Trail) extending from near the top of Chair 7, located at Canyon Lodge, to the northwest corner of Minaret Road (SR-203) and Forest Trail Road, located within the North Village (The Village). The Ski Back Trail would also be accessible from the top of Chairs 4, 5, 9, 17, 20, 21, 22, 25, Canyon Express, Goldrush Express, and the Panorama Gondola, and would connect to The Village via a pedestrian bridge over Forest Trail Road.

The length of the trail would be approximately 7,800 linear feet with a width of 22 feet, in order to accommodate snow grooming equipment. The overall vertical drop along the entire length of the trail would be from 8,620 feet in elevation to 8,080 in elevation, a drop of approximately 540 feet. The Ski Back Trail will follow the natural slope and grade of the terrain and will generally range from less than six percent to nine percent slope, with the exception of the beginning and end of the trail that would range from 3.6 percent to 5.0 percent slope.¹

The Ski Back Trail would likely appeal to users upon initial first-time visits and to younger-age skiers on a more regular basis. The sense of adventure, keeping skis on for the maximum time, and skiing into condos/hotels would contribute to the demand. Additionally, the benefit of not standing and waiting for a bus or private vehicle, not standing on a bus, not waiting in traffic, or not waiting for a gondola would also add to the attractiveness of the use of the Ski Back Trail. The proposed Ski Back Trail would be attractive to skiers, intermediate and above skill level, but is not anticipated to attract beginner/intermediate snowboarders since they may be required to walk the sections of the trail that are six percent grade or less. The skiers would originate from either The Village (through Canyon Lodge) or Main Lodge. It is projected that the trail would have a skier capacity of 900 to 1,200 skiers per hour.

1.2 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the Ski Back Trail is to increase skiable terrain at the Canyon Lodge portal and to simultaneously create skier return capacity to The Village portal. Existing up-slope

¹ While an ideal grade of eight to nine percent would ensure continued skier movement in any snow conditions, a grade of seven percent will ensure continue movement on most days.

capacity exceeds down-slope capacity causing slope crowding and excessive demand on The Village Gondola and the Canyon Lodge and Main Lodge Transit systems at the end of the day. In addition, future development of The Village is expected to double the demand on the Village Gondola. Construction of an additional trail accessible by skiers to The Village, Canyon Lodge, and Main Lodge would allow for a better balance between up-slope and down-slope skier capacity thus, improving circulation, resource allocation, and guest experience.

Currently, during an average winter Saturday, MMSA accommodates approximately 13,500 skiers, which is the established “design day” for purposes of traffic planning, capacity analysis, and the level of service assumed by the Town of Mammoth Lakes (Town) to adequately accommodate all the skiers on the mountain. However, during peak days, which include the week around Christmas Day, Thanksgiving weekend, Martin Luther King Day, and Presidents Day weekend, there are more than 19,000 skiers/snowboarders on the mountain.²

Skiers typically arrive in the morning over a two hour period. However, at the end of the day, skiers generally depart over a one hour period, exceeding the down-load capacity of the Village Gondola and resulting in longer lines for the buses going from the Canyon and Main Lodges to The Village. Specifically, the maximum down-loading capacity for The Village Gondola is 2,200 persons per hour. Existing demand for the gondola returning to The Village exceeds capacity on a typical Saturday by 350 persons and on peak Saturdays by 700 persons, resulting in a queue of 10 to 20 minutes, respectively. However, The Village development area is currently only 50 percent build-out. With buildout anticipated by 2010, the Village Gondola return trip demand will increase to 4,500 skiers and on peak days 6,400 skiers.³

Similarly, on a typical winter Saturday, skiers at the Main Lodge tend to wait in lines of up to 300 skiers or up to an hour for buses between 3:30 P.M. and 4:30 P.M. and likewise up to approximately 200 skiers at the Canyon Lodge.⁴ This wait time is exacerbated by the fact that the existing intersection conditions of Minaret Road and Forest Trail Road are at a level of service (LOS) F, which is below the Town’s criteria of LOS D, for eastbound and westbound traffic. In addition, while the Minaret Road/Main Street intersection currently functions at a LOS C, during peak days the level of service drops to well below LOS D. The revised traffic analysis for the *Town of Mammoth Lakes 2007 General Plan Update (General Plan Update)*, projects that at buildout, both of these intersections (unmitigated) would function at LOS F and E, respectively. Therefore, adding more buses would ease the wait in line but not quicken the downhill ride time.

² Peak days in excess of this “design day” may occur 10 to 12 days per season.

³ *Town of Mammoth Lakes, North Village Specific Plan (2000)*, identifies the projects that are currently in the CDD development list.

⁴ *Communications with MMSA Transportation Supervisor, Paul Weden.*

It is estimated that the Ski Back Trail will reduce the existing demand on the Village Gondola to 2,000 skiers per hour rather than 3,200 and reduce future demand on the Village Gondola to 5,200 skiers per hour rather than 6,400, with a wait of approximately 80 minutes rather than 115 minutes. This amount could also reduce the number of skiers riding the transit buses between Canyon Lodge and The Village by 120 to 180 riders.⁵ Although buildout demand would still be greater than capacity, the Ski Back Trail would provide an alternate route for approximately 900 to 1,200 skiers per hour to depart the mountain contributing to the Town's overall master plan by balancing the up-slope and down-slope capacity.

It is also important to note that in the *General Plan Update*, the Town has adopted a "feet first initiative," prioritizing walk, ski, bike first, transit second, and car last. The amount of skiers/snowboarders traveling from outside the area not only impacts the capacity of MMSA, but also traffic conditions within the Town and the issue of global warming has become especially sensitive to this area due to the increased impacts experienced by mountain resorts. The Town has acknowledged that the issue of global warming has become especially sensitive to this area. As a result, on February 7, 2007, the Town passed a resolution endorsing the U.S. Mayors Climate Protection Agreement. The U.S. Mayors Climate Protection Agreement set a target of reducing greenhouse gas (GHG) emissions by 80 percent by the year 2050. Focusing on transportation efficiency can yield immediate benefits while supporting other goals of the Town. As such, development of the proposed Ski Back Trail would add additional skiable terrain to the Canyon Lodge portal, help to alleviate the over capacity of the Village Gondola and the overburdened transit system, while simultaneously providing an alternative to the GHG emission producing automobile trips within the Town.

1.3 KEY PARTICIPANTS

The following describes the key participants and their roles in the development, analysis, and decisions related to the Proposed Action. Section 1.7 provides a detailed list of the necessary approvals for the Proposed Action.

a. United States Department of Agriculture (USDA) Forest Service, Inyo National Forest

The Forest Service, Inyo National Forest, is the management agency responsible for the public lands within the project area. The Forest Service must comply with the National Environmental Policy Act (NEPA) requirements to review and comment on matters that address

⁵ This is assuming that 60 percent of skiers who would wait in line for the Blue Line bus at Canyon Lodge would instead utilize the Ski Back Trail.

or relate to its areas of legal jurisdiction and/or area of special expertise. Consistent with requirements of NEPA, this EA would also serve as a decision-making tool to assist the Forest Service.

The National Forest Management Act requires the Forest Service to deny proposals that are inconsistent with Forest Plans, are in conflict with management objectives or Federal statutes and regulations, or can be reasonably accommodated on non-National Forest System lands. The primary objective of the National Forest Management Act is to establish land and resources management planning guidelines, goals, and objectives in order to achieve effective and balanced uses while protecting renewable resources on National Forest Service lands. The National Forest Management Act requires each individual forest to develop, adopt, and implement a comprehensive planning and management plan.

Title 36 of the Code of Federal Regulations (CFR) establishes the regulations under the Federal Land Policy and Management Act as implemented by the Forest Service. Title 36 CFR Sections 219.1 through 219.29 provide the guidelines for the development of forest-specific planning documents as required by the National Forest Management Act. A key purpose of the planning documents is to “provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term net public benefits in an environmentally sound manner.”

As required by Title 36 CFR 219, a Land and Resource Management Plan (LRMP) for the Inyo National Forest has been prepared and adopted. Under the LRMP, the site is located within the “Alpine Ski Area” (Management Prescription Area #13). The purpose of this prescription is to maintain and manage downhill ski areas for public use. The management direction relating to recreational land use is as follows:

- Permit further expansion of areas already developed for alpine skiing. Expansion may include runs, lifts, base areas, and access to a degree that is often not compatible with other resource management options.
- Allow limited day use and interpretive developments if compatible with ski area development.

b. MMSA (Project Applicant)

MMSA operates the ski facility under a Special Use Permit issued by the Forest Service. The management emphasis for the area within this proposal is to manage downhill ski areas for public use and upgrade and expand facilities to meet allowable capacity consistent with approved plans.

1.4 RELEVANT POLICIES, PLANS, AND MANAGEMENT OBJECTIVES

a. Forest Service

Principal direction from the Inyo Forest Plan as amended by the Sierra Nevada Forest Plan Amendment 2004 Record of Decision (ROD), as applicable to this project is as follows:

- Permit further expansion of areas already developed for alpine skiing. Expansion may include runs, lifts, base areas, and access to a degree that is often not compatible with other resource management options. (INF LRMP 1988, Rx #13, p. 138)
- Design and locate improvements to provide for user safety and to harmonize with the natural environment. (INF LRMP, 1988, Rx #13. p. 138)
- Meet or exceed the partial retention Visual Quality Objective for runs, lifts, and base areas as seen at middle ground distances from Sensitivity Level 1 routes and occupancy sites. (INF LRMP, 1988, Rx #13. p. 138)
- Maintain timber stands for health and vigor only. Timber harvest is incidental to ski area expansion. (INF LRMP, 1988, Rx #13, p. 138)
- Ensure that new ski area facilities, associated developments and roads maintain the integrity of major mule deer staging areas during spring and fall migration. (INF LRMP 1988, Rx #13, p. 139)
- Conduct, or require of lessees, contractors and permittees, dust abatement procedures during construction or other activities that generate significant dust. (INF LRMP 1988, Rx #13, p. 75)
- Consider mass transit options when vehicle use exceeds the capacity of existing roads or threatens to damage resource values, or when public facilities can best be served by a community-wide system. (INF LRMP 1988, Rx #13, p. 77)
- Utilize existing developed facilities, roads, and trails for both summer and winter recreation activities, whenever possible, before developing new ones for exclusive seasonal use. (INF LRMP 1988, Rx #13, p. 78)
- Design and construct structures or facilities located near active faults and/or areas of know seismic activity to withstand seismic impacts. (INF LRMP 1988, Rx #13, p. 80)
- Make a slope suitability examination based on sheer strength/sheer stress relationships before constructing roads or other permanent developments in areas that are a hazard because of instability. (INF LRMP 1988, Rx #13, p. 80)

- Obtain the Forest Supervisor's approval through the environmental analysis process for any deviations from Visual Quality Objectives assigned in prescriptions. (INF LRMP 1988, Rx #13, p. 93)
- Incidental removal of vegetation and down woody material for activities such as administering special use permits; maintaining recreation developments; constructing, reconstructing, and maintaining roads, trails, and rights of way; expanding resorts based on approved development plans; and removing trees that present imminent safety hazards may deviate from vegetation management standards and guidelines. Exceptions to vegetation management standards and guidelines may also include restoration activities, such as regenerating aspen, managing sugar pine, and regenerating giant sequoia. (SNFP ROD, 2004, A-29)
- Evaluate proposals for new roads, trails, off highway vehicle routes, and recreational and other developments for their potential to disturb northern goshawk nest sites. Mitigate impacts where there is documented evidence of disturbance to the nest site from existing recreation, off highway vehicle route, trail, and road uses (including road maintenance). (SNFP ROD, 2004, A-37)

b. Local Plans and Policies

The Town and MMSA have a close relationship due to their physical land connection and economic dependency. As such, despite the fact that the Proposed Action does not require approval by the Town, it is necessary to ensure that the Proposed Action is consistent with the relevant Town's plans and policies. Therefore, below is a summary of the Town's planning documents relevant to the Proposed Action.

(1) North Village Specific Plan

The primary purpose of the *North Village Specific Plan (Specific Plan)* is to provide new land use guidelines and development standards for the North Village area which will enable the development of a cohesive, pedestrian-oriented resort activity node, with supporting facilities, to create a year-round focus for visitor activity in the Town. The *Specific Plan* provides a mechanism for directing and focusing development in the project area and will contribute to the overall goal of positioning Mammoth Lakes as a year-round destination resort community. This document references the development of the Ski Back Trail within both the Land Use Element and the Circulation Element, as listed below:

- Development Objectives - The skier bridge provides direct access to the ski back trail linking North Village to existing ski area facilities. (Pedestrian Core Area-8-West Side pg. 18)

- Proposed Circulation Improvements – Construction of a ski-back trail. (pg. 55)

(2) Town of Mammoth Lakes 2007 General Plan Update

The *General Plan Update* includes measures to promote the public health, safety, and general welfare of the community. These types of measures include reducing traffic emissions in order to reduce GHG emissions, as listed below.

- Goal: Ensure safe and attractive public spaces, including sidewalks, trails, parks and streets.
- Goal: Emphasize feet first, public transportation second, and car last in planning the community transportation system while still meeting level of service standards “D.”
- Goal: Encourage feet first by providing a linked year round recreational and commuter trail system that is safe and comprehensive.

(3) Resolution Endorsing the U.S. Mayors Climate Protection Agreement

In June of 2007, the U.S. Conference of Mayors (USCM) unanimously endorsed the “U.S. Mayors Climate Control Agreement.” Mayors and council who sign on to the agreement are making a commitment to reduce GHG emissions in their own cities and communities to seven percent below 1990 levels by 2012 through actions, such as increasing energy efficiency, reducing vehicles miles traveled, maintaining healthy urban forests, reducing sprawl, and promoting clean renewable energy resources.

Mammoth is well positioned to take a leadership role in demonstrating meaningful reduction in carbon dioxide (CO₂) emissions. Adopted policies including the Urban Growth Boundary, the in-town workforce housing program, and construction of overhead lifts into the community, form a basis for meaningful CO₂ reductions. In this effort, the Town has established various GHG policies regarding economic development, efficient land use pattern, workforce housing, transportation, and alternative energy/energy efficiency.

1.5 NEPA DOCUMENT

This Environmental Assessment (EA) was prepared as a Federal environmental document, as required by NEPA regulations [40 CFR 1506.2(c)]. A third party consultant, PCR Services Corporation, Inc. (PCR), prepared the NEPA document under the direction of the Forest Service. This EA was prepared to conform to the policy guidance provided in the Forest

Service's *Environmental Policy and Procedures Handbook* (FSH 1909.15). This handbook also provides instructions for compliance with the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Department of Agriculture's *NEPA Policies and Procedures* (7 CFR 1b) and the *Forest Service Manual* (FSM 1950). In addition, Forest Service guidance relative to NEPA is found at 40 CFR 1500, 36 CFR 215, and FSH 1909.15.

a. Public Scoping

The Ski Back Trail has been identified in several planning documents and publications. Various alignments and proposals for a Ski Back Trail have received substantial public review over the last several years, including open houses, field trips, and news articles. The initial proposed alignment was presented to the public in an MMSA sponsored open house on November 10, 2003, with invitations extended to all adjacent landowners, the public, and other interested parties; 25 members of the public and representatives of local government attended. Input from this open house was used by MMSA to aid in refining the draft proposal prior to engaging in a formal NEPA process.

An open house to review the Original Proposal alternative was held at the Mammoth Ranger District Auditorium on Thursday, September 9, 2004 from 6:00 P.M. to 8:00 P.M. to provide an opportunity for the public to better understand the details of the proposal and ask questions. A total of 15 members of the public and representatives of local government were in attendance.

Field trips covering the proposed trail alignment were held on Wednesday, October 6, 2004, and Saturday, October 9, 2004. Twenty-one members of the public and representatives of local government attended the Saturday field trip. An opportunity was also provided for the public to ski the proposed alignment on December 11, 2004.

b. Identified Issues and Concerns

The following environmental issues were identified through a review of the written comments and concerns received during formal scoping and preliminary agency review of the Proposed Action:⁶

- Construction of the Ski Back Trail would result in short-term and long-term impacts on Uptown and Downtown mountain bike trails.

⁶ Copies of all comments received are on file with the Mammoth Mountain Ski Area, P.O. Box 24, 1 Minaret Road, Mammoth Lakes, CA 93546.

- Construction of the Ski Back Trail would change the character of the Uptown/Downtown mountain bike trails and rider experience.
- Possibility of constructing an alternative bike trail system on the north side of Minaret Road to replace the Uptown/Downtown mountain bike trails.
- Construction and operational (grooming, snow-making, skiers) noise impacts to residents, recreationists, and wildlife.
- Impacts regarding an increase in construction and operational air emissions.
- Impacts regarding the spread of noxious/invasive weeds as a result of construction of the Ski Back Trail.
- The loss of forested land with “Old Growth” characteristics due to construction of the Ski Back Trail.
- The displacement of wildlife due to construction and operational impacts associated with the Ski Back Trail.
- Impacts to water quality as a result of construction and maintenance activities required for the Ski Back Trail.
- Soil erosion impacts due to construction and maintenance activities associated with the Ski Back Trail.
- Impacts to transportation, public transit facilities, and ingress/egress from MMSA.
- Viewshed impacts to the adjacent residential community (Mammoth Slopes) to the south.

1.6 DOCUMENT ORGANIZATION

The EA is organized by the sections summarized below:

- **Section 1 – Introduction/Purpose and Need**, provides a brief overview of the Proposed Action and the environmental review process and outlines the organization of the EA. This section also includes the purpose and need for the Proposed Action and the relevant reviewing agencies and applicable planning documents.
- **Section 2 - Proposed Action and Alternatives**, describes the site location, the Proposed Action, and the alternatives considered.

- **Section 3 - Environmental Consequences**, summarizes the physical, biological, social, recreational, and economic environments of the affected project area and the potential changes to those environments due to implementation of the alternatives. It also presents the scientific and analytical basis for the comparison of alternatives. Finally, this chapter emphasizes disclosure of those issues that may result in adverse impacts.
- **Section 4 - Preparers and Organizations Consulted**, lists the individuals involved in preparing this EA and organizations and persons consulted to ascertain supporting information to support the analyses.
- **Section 5 - References**, identifies the documents (printed references) used in preparing this document.
- **Appendices**, present data supporting the analyses or contents of this EA. The appendices include the following:
 - Appendix A: Traffic Impact Analysis
 - Appendix B: Air Quality Technical Worksheets
 - Appendix C: Noise Technical Study
 - Appendix D: Floral and Faunal Compendia and Sensitive Plant Species Table
 - Appendix E: Heritage Resources Letter
 - Appendix F: Preliminary Geotechnical Investigation
 - Appendix G: Ecosign Study
 - Appendix H: Visual Resources Assessment

1.7 NECESSARY APPROVALS

Approvals required for development of the Ski Back Trail would include, but not be limited to, the following:

- Forest Service
 - Decision Notice
 - Finding of No Significant Impact
 - National Forest Management Act Consistency Determination

- Town of Mammoth Lakes: Community Development Department
 - Grading Permit
 - MPDS Grading Permit

- Lahontan Regional Water Quality Control Board