



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



December 27, 2022

Lesley Yen, Forest Supervisor  
c/o Fred Wong, Mammoth Lakes District Ranger  
Inyo National Forest  
351 Pacu Lane, Suite 200  
Bishop, CA 93514

Submitted online: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=62406>

RE: Comments on the NOP for the Mammoth Mountain Main Lodge Redevelopment Project.

Dear Supervisor Yen and District Ranger Wong:

The Range of Light Group (ROLG) is part of the Toiyabe Chapter of the Sierra Club and consists of 400 Sierra Club members in Inyo and Mono Counties. We treasure our public lands, forests, and wildlife. Many Sierra Club members ski, hike, bike, and snowmobile at, on, and around Mammoth Mountain. On behalf of the Sierra Club's Range of Light Group Executive Committee, I'd like to express our thoughts on the Notice of Preparation of an Environmental Impact Statement (EIS) for the Mammoth Mountain Main Lodge Redevelopment project.

### **Accounting for the Water**

Inferring from the Notice of Preparation and scoping documents posted on the USFS website for this project, all the water for the new facilities i.e., the hotels, restaurants, shops will come from the wells on USFS public land and not from the tertiary sewage water treatment plant. It wasn't mentioned in the scoping documents, but to clarify, there will not be any wells installed on Parcel A or Parcel B? If that is the case, then more water will be used for the facilities under the new plan than currently is used as there will be 1,216 additional overnight guests and probably an increase in day-use as well. There will be less well water used for snowmaking since some portion or all of it will come from the treated wastewater. So, the critical question is, what is the net change in well water usage?

MMSA operates five wells on USFS land that tap the Dry Creek aquifer. Please identify in the Environmental Impact Statement (EIS) which wells currently supply MMSA's facilities at Main Lodge, the Mill, and at the top of the mountain and include information about those wells in the EIS i.e., water level, pumped amount. It would be helpful if the EIS related it to the well information in CASGEM and water rights in eWRIMS. There is one water right, id A030222, assigned to MMSA on the Mammoth Mountain near the McCoy station in the eWRIMS database. It is in the Dry Creek drainage and assigns up to 154 acre-feet of water per year to MMSA for snowmaking and irrigation. This is not enough to provide the water needed for the facilities at Main Lodge or for all the snowmaking on the mountain. There must be other wells supplying those needs. There are five wells listed in the CASGEM database with no further information. The CASGEM ids are 26586, 26585, 26584, 2142, and 2143. All five are in the Dry Creek drainage as well. The proposed new wells identified in "DN Figure 1: Approved Snowmaking



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



Projects” in the Final Decision Notice for the MMSA Snowmaking and Woolly’s Adventure Summit Projects Environmental Assessment do not show up in eWRIMS or in CASGEM. These two new wells would also be in the Dry Creek drainage. Have they been installed? If so, what are the water levels and amounts pumped? Will they be entered into CASGEM?

We expect the Environmental Impact Statement to identify the amount of groundwater used for the current facilities in Parcel A and the amount projected for the facilities in Parcel A and B under the new plan. We also expect to see how much groundwater is currently used for snowmaking and how much will be used under the new arrangement where some of the water for snowmaking will come from groundwater and some will come from the tertiary water treatment plant.

The Decision Notice for the MMSA Snowmaking and Woolly’s Adventure Summit Project also states that there will be a monitoring plan of the groundwater. It would be helpful to include that plan in the EIS and any of the annual reports since the plan was developed.

The Sierra Club is very concerned about protecting our natural resources and biodiversity. Unsustainable groundwater pumping impacts surface vegetation, local springs, and wildlife. Droughts since 2012 have stressed the trees in the Dry Creek basin and they have been dying from bark beetle infestations. This increases the risk of wildfire which is being address by the ESCCRP project. To reduce the potential for crown or high-intensity wildfires, the forest is being thinned to decrease the number of trees so that the remaining trees will have sufficient water to fight off the bark beetle. I think we need to consider the impact on the forest in the lower Dry Creek drainage of MMSA’s groundwater pumping up-gradient. How much is groundwater pumping exacerbating the problem?

Based on the 2001 Breibart hydrology study of the Dry Creek watershed<sup>1</sup>, both the surface runoff and the groundwater, flow from the north face of Mammoth Mountain down the Dry Creek drainage and onto the flats around Deer Mountain and the Inyo Craters. The surface snow on the flats percolates down into the ground and contributes to the aquifer too. However, the Breibart study found that >50% of the snow can evaporate in a dry year. The Burak 2015 thesis<sup>2</sup> states that Dry Creek contributes to Big Springs in the Owens River headwaters. Depending upon the amount of water pumped, extractions from the upper Dry Creek basin could impact the lower Dry Creek basin and Big Springs.

It is in the public’s best interests to sustainably manage the aquifer to preserve and maintain a healthy forest and to minimize the damage in the event of a wildfire.

---

<sup>1</sup> <https://bren.ucsb.edu/projects/mammoth-groundwater-extraction-hydrological-analysis-potential-recharge-eastern-sierra>

<sup>2</sup> [https://scholarworks.unr.edu/bitstream/handle/11714/2600/Burak\\_unr\\_0139M\\_11874.pdf?sequence=1](https://scholarworks.unr.edu/bitstream/handle/11714/2600/Burak_unr_0139M_11874.pdf?sequence=1)  
12/18/22 9:23 AM



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



### **Residential Property vs. Employee Housing**

Three of the reasons for the Land Exchange were to improve the visitor experience and enhance the economic development of the town of Mammoth Lakes. The Final Record of Decision for the Land Exchange dated January 2019 states,

- “Need Statement 3: Improve visitor experiences at Mammoth Mountain Ski Area (MMSA) by transferring Federal parcels, primarily the MMSA Base Main Lodge, into private ownership in accordance with FLPMA.
- Need Statement 4: Meet the economic needs and enhance future community development of the Town of Mammoth Lakes and Mono County, California.
- Need Statement 5: Transfer land ownership of existing human wastewater treatment systems, which are connected to MMSA base facilities and located on the Federal parcels. Adequate management direction for a system serving a mix of private and permitted facilities is not included in the 1988 Inyo National Forest LRMP, limiting the ability of the Forest Service to maintain the sewage ponds in a way that is compatible with appropriate uses of NFS lands.”

The Record of Decision goes on to argue the Land Exchange is in sync with the objectives of FLPMA:

“The Selected Alternative is compliant with FLPMA, and the land exchange is in the Public Interest for Landownership Adjustments. In accordance with 36 CFR § 254.3(b), the Forest Service guidance for determination of Public Interest for Landownership Adjustments, the Selected Alternative will meet the intent of 36 CFR § 254.3(b) through the acquisition of:

- Private parcels that will result in increased management efficiency by consolidating land ownership;
- Key private inholdings within or adjacent to important management areas;”

Further, as stated in 43 U.S.C. § 1716(a), “When considering public interest the Secretary concerned shall give full consideration to better federal land management and the needs of State and local people, including needs for lands for the economy, community expansion, recreation areas, food, fiber, minerals, and fish and wildlife and the Secretary concerned finds that the values and the objectives which Federal lands or interests to be conveyed may serve if retained in federal ownership are not more than the values of the non-Federal lands or interests and the public objectives they could serve if acquired.” Due to the highly developed nature of the Federal parcels in their existing state, I believe that potential impacts associated with the approved land exchange, as disclosed in the Final EIS, are not capable of outweighing the values of the non-Federal lands or interests and the public objectives they could serve if acquired.”

How are the 15 residential lots supporting these goals? If the 15 residential lots are sold and become private properties, then this would not support the public at large. It would become an exclusive area for a select few. Rentals and employee housing would more appropriate and would help the economic growth of the town (Need Statement 4).



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



There is no mention of employee housing in the scoping documents. If the visitor services and amenities require more employees than are working there today, then there will be a need for more employee housing when there's already a serious lack of housing. This project is a great opportunity for MMSA to create the needed employee housing for its workers and not rely on the town to supply it.

### **Packing More Into the WUI**

The EIS should note that this project is in the wildland-urban interface (WUI) and that there will be 1,216 more overnight guests than before plus the many more residents in the 15 residential lots. The scoping documents were vague as to how many people would be living in Parcel B so we assume the estimate of 2,000 overnight guests does not include those living in Parcel B. With Parcel B, there will be closer to three times more people living in the WUI zone which will make it harder to fight wildfires. This project is putting more people and expensive structures at risk that will require significant fire-fighting resources to protect. Is this really the best place to have high-density overnight accommodations?

Since there will be more people and more residences than there currently are, it is important to have an evacuation plan for the visitors and for the residents. There will be people evacuating from the Devil's Postpile as well. Will MMSA be able to get everyone out quickly?

It isn't clear, but we assume the defensible space being proposed will be on Forest Service land to maximize the number of commercial buildings and visitor services on the parcels. This will require the forest around the parcels to be thinned and there should be defensible space within the parcels as well. The Appendix A document in the April 29 letter to the Forest Service mentions the use of shaded fuel breaks in the parcels. While this is good, there is so much more that should be done. The buildings should follow the CalFire standards with no vegetation within Zone 0 the ember-resistant zone, no trees within Zone 1 the first 30 feet from the building, and then limited trees and vegetation in Zone 2. The building materials for exterior walls should be fire resistant. Figure 6--the Parcel B Illustrative Concept Plan shows a lot of vegetation around each residence. That would not be defensible space. How will MMSA ensure the residents maintain defensible space on their property, e.g., that they don't plant next to the house, or that they rake dead leaves and pine needles and limb up the trees? Will the treated wastewater be used for any lawns and live vegetation in Parcel B to create defensible space around the residences or will it be well water? If one residence does not maintain defensible space, it puts all the others at risk.

Please include in the EIS an alternative that has fewer people living or staying overnight in the project area.

### **Development Creep on Public Lands**

Besides the possible increase in groundwater pumping, the other major impact to the environment that should be addressed is the removal of thousands of trees for the Big Bend parking lot and in the areas marked in blue on the maps for snowmaking that presumably will be new ski runs. This is a loss of nature, another "paper cut" that will affect us all. Please note in



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



the EIS how many acres are being developed within the Special Use Permit (SUP) for the parking, the administrative buildings, the new location for the gondola and other amenities for MMSA visitors.

Section 2343.11(2) of the FSM states that “Any expansion of a ski area permit boundary must be based solely on needs related to snow sports.”

FSM 2343.14(1)(g) states that “activities and associated facilities must: increase utilization of snow sports facilities and not require extensive new support facilities, such as parking lots, restaurants, and lifts.”

Please consider an alternative that does not use more of the public lands for parking than already is used. How will this parking support people who use the public lands and are not there as MMSA skiers? There are many people who back country ski or cross-country ski and need access to the Minaret Vista area and the Earthquake Dome area. Where will they be able to park and how will they have access to free recreation on public lands in these popular areas?

### **Dark Skies**

FSM §2343.14(1)(e) states: “To the extent practicable, harmonize with the natural environment of the site where they would be located by:

- (1) Being visually consistent with or subordinate to the ski area’s existing facilities, vegetation and landscape”

The main lodge is near the boundary of the Ansel Adams Wilderness and at the entrance to the Devils Postpile National Monument. This project will have buildings from two to eight stories high. An eight story building would be at least 87 feet in height. That is about as tall as mature lodgepole pines can get. But lodgepoles are scragglier at higher elevations and not as tall. Since the area around the parcels will be thinned for defensible space and the landscaping within the parcel should be low, an eight story building would probably be quite visible from a distance. The rooms will have lights on at night and there will be outdoor lighting as well creating an overall glow of light that might be visible from different points in the wilderness to the north and west. Please include in the EIS how visible light from the buildings would be at night from points along the John Muir Trail and the San Joaquin Ridge or if there would be any visible reflections off of the windows that could be seen from a distance during the day. It would be a loss of the wilderness experience to the public if this project is a prominent feature in the area.

Please include in the EIS an alternative that has lower buildings that will be hidden by the surrounding forest.

### **MMRP**

Under “Potential Permits and Approvals Requested” in the town’s Notice of Preparation document, it says there will be adoption of a Mitigation Monitoring and Reporting Program (MMRP). Please elaborate on what the mitigation requirements are and how they will be met.



Range of Light Group  
Toiyabe Chapter, Sierra Club  
Counties of Inyo and Mono, California  
P.O. Box 1973, Mammoth Lakes, CA, 93546



### **Climate Change Impacts**

This project as well as the Woolly's Adventure Summit/Snowmaking project add to the CO2 emissions; not only during construction, but forever after. When will MMSA actually do something to fight climate change? Will there be solar panels to offset the additional propane and electricity usage? Will there be public EV charging stations? Will there be electric buses between the town and the ski area? It is time for MMSA to take responsibility for their contribution to a warming planet. Will MMSA offset this increase in CO2 emissions with a mitigation project? MMSA could put up solar panels at the Mammoth airport to offset their increased emissions or put in universal fast chargers in town as mitigation. There should be no waivers to get around putting in solar.

Global warming is happening now and we, as a species, need to reduce CO2 emissions now. The more CO2 in the atmosphere, the less snow we will get here. That forces more snowmaking, which creates more CO2. It is time to recognize that skiing should not be expanded. Thank you for the opportunity to provide input. We look forward to the environmental impact statement for this project.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Boulton".

Lynn Boulton, Chair  
Range of Light Group, Toiyabe Chapter  
Sierra Club