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October 20, 2023

*Re: Town of Mammoth Lakes Town Council Subpart-C Public Comment*

Dear Inyo National Forest Supervisor Yen,

For your consideration, please find the public comments of the Mammoth Lakes Town Council regarding the initial Inyo National Forest Subpart-C proposed action. Town Council unequivocally supports access to public lands for OSV users, and unless otherwise stated, is supportive of the current proposed action. The Council discussed its recommendations provided herein at a public meeting on October 4, 2023.

Town Council is recommending changes to a few areas, specifically related to staging, access, and conflict mitigation that are not addressed in the current proposed action, which council recommends addressing through the Subpart-C process.

- Town Council supports the proposed Staging area at the New Shady Rest Campground. However, the chosen route for the groomer shown in the proposed action is not viable. Council would propose the Forest groomer use the existing Multi-Use Path (MUP) from the new proposed staging area, cross the entry road into Shady Rest Park onto 3S289, east onto 3S288, then connecting with the 'A Trail' just north of the park. The MUP is currently groomed by TOML for non-motorized use and to ensure no net loss of non-motorized trail mileage, council supports moving TOML's groomed route into the forest east of the MUP. This option would reduce the number of OSVs in Shady Rest Park minimizing congestion and reducing user conflict, while maintaining the existing non-motorized trail mileage.
- Address the need for a high elevation OSV staging area. The current cinder shed would be an ideal location for this use. To support the high elevation staging area, improvements to the site are recommended, such as leveling, paving, and information / educational signage.
- Address the need for OSV staging along the Mammoth Scenic Loop Road, but not immediately adjacent to the additional paved lane used for snow-play parking. The Council recommends the entrance to 3S22 (Inyo Craters Road) as a viable staging option. Council also recommends consideration of another staging area near the junction of the Scenic Loop and Highway 395, allowing for staging opportunities when the Scenic Loop isn't plowed.
- Council would like to see increased safety measures implemented related to the ORMAT Pipeline. Many of these measures are spelled out in the CD IV pipeline NEPA document and the measures called for in the document should be fully implemented. The requirements are on pages 2-67 and 2-68 from the final EIR for the ORMAT Pipeline, "Casa Diablo IV Geothermal Development Project 2-67 June 2013.
- Town Council is supportive of the Town of Mammoth Lakes previously submitted proposal for expanded grooming in both the Sherwins and Shady Rest areas. In the Sherwins area, the Town

has initiated and is pursuing a winter grooming program consistent with a recommendation from the Sherwins Area Recreation Plan (SHARP), adopted by town council in 2011 along with the Trail System Master Plan (TSMP). The SHARP was developed and drafted by the Sherwins Working Group, a citizen stakeholder collaborative directly supported by staff from both the U.S. Forest Service and the Town of Mammoth Lakes. Winter Map ID 9a is being developed by the town for expanded non-motorized winter recreation opportunities in the Sherwins meadow area. Please see the attached concept, rationale, and map for SHARP Winter Map ID 9a from SHARP.

- Also, per the SHARP, the Sherwins Meadow, from roughly the Tele-Bowls west to the bluffs, is recommended as non-motorized should a groomed trail system be developed and implemented in the meadow. The specific recommendation from the SHARP document for OSV use in the Sherwins area – SHARP Winter Map ID #18 - is tied to winter grooming. Town Council looks forward to working with the Inyo National Forest to further develop this recommendation from SHARP as part of your final decision on Subpart C.
- Town Council is supportive of delineation of uses on SR 203 during winter months between the Main Lodge area of Mammoth Resorts and the Minaret Vista. This could include creating lanes for motorized and non-motorized uses along the road or 're-opening' of the original road for OSV use which sits below the existing road to the North.

We appreciate your consideration and through our Subpart-C MOU, look forward to our continued partnership to enhance opportunities and experiences for our residents and visitors enjoying the Inyo National Forest.

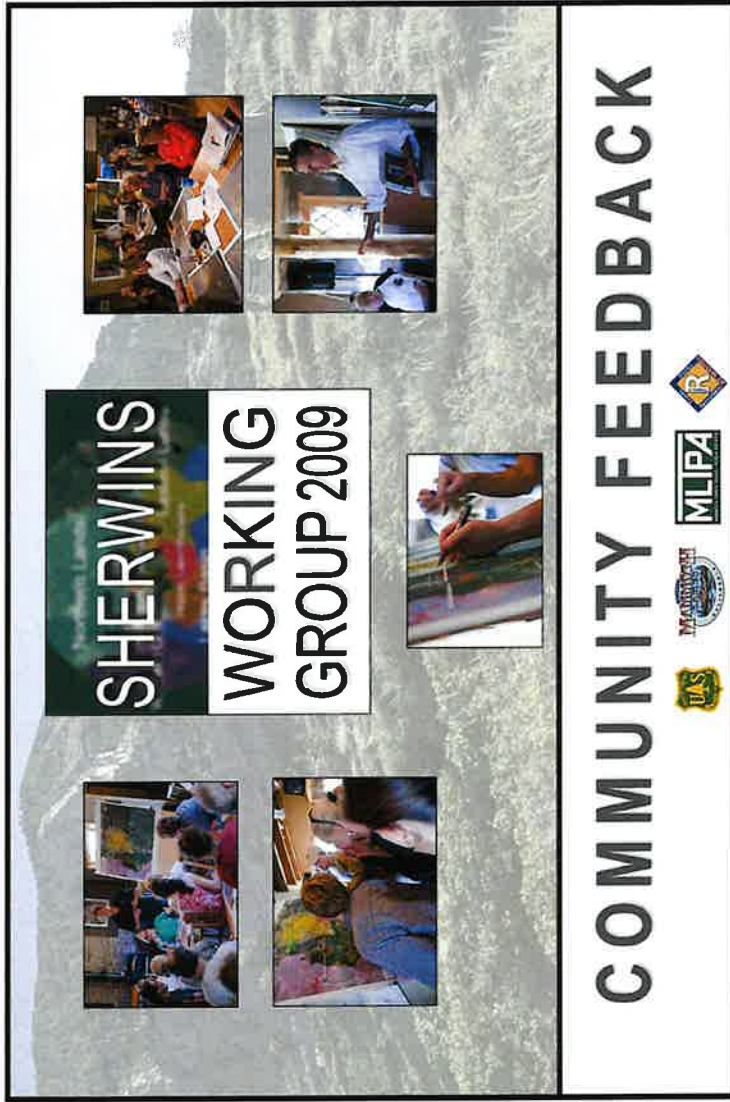
Sincerely,



Daniel C. Holler  
Town Manager

SHARP Information Attached

Cc: Town Council  
Lawson Reif, Outdoor Recreation Manager



# WINTER NARRATIVE

Final Draft

November 3, 2009

## Sherwins Working Group: Winter Map ID Descriptions



Map ID #	Description
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**CONCEPT:** Grooming on Old Mammoth Road from the Mill City staging area (Winter Map ID #6) to the Lakes Basin

Groom over the existing Old Mammoth Road alignment from the Mill City staging area to the intersection of Old Mammoth Road and Lake Mary Road. This will be corduroy only (no Nordic track) that will be open to non-motorized use only until April 17, when the Lakes Basin opens for OSV use.

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**RATIONALE:** Grooming this portion of Old Mammoth Road will facilitate connectivity to the Lakes Basin for non-motorized users, as it will provide an easier surface on which to cross-country ski, snowshoe, or skin. Following the existing road alignment will allow grooming to occur with a low snow threshold, keeping this access/egress corridor open longer than would be possible if it were groomed over vegetation.

**CONCEPT: Non-motorized stacked-loop trail system in the meadow**

Articulate a stacked-loop trail system from the borrow pit staging area (see Winter Map ID #1), along the base of the Sherwins to the Tamarack Street trailhead (see Winter Map ID #5c), and back to the borrow pit staging area. Facilities will include signage and some maintenance; a specific grooming program will be developed to provide a quality experience for multiple uses, which may include separate trails or delineation as appropriate. The westernmost loop is intended to be left ungroomed, while the section connecting the borrow pit staging area and the Tamarack Street trailhead is intended to be groomed. This system will be aligned, if possible, over the summertime system (see Summer Map ID #8) and will be open to non-motorized use only. This system will be contained within the developed recreation area described in Winter Map ID #18 and will provide connectivity to the Lakes Basin via the connector described in Winter Map ID #7.

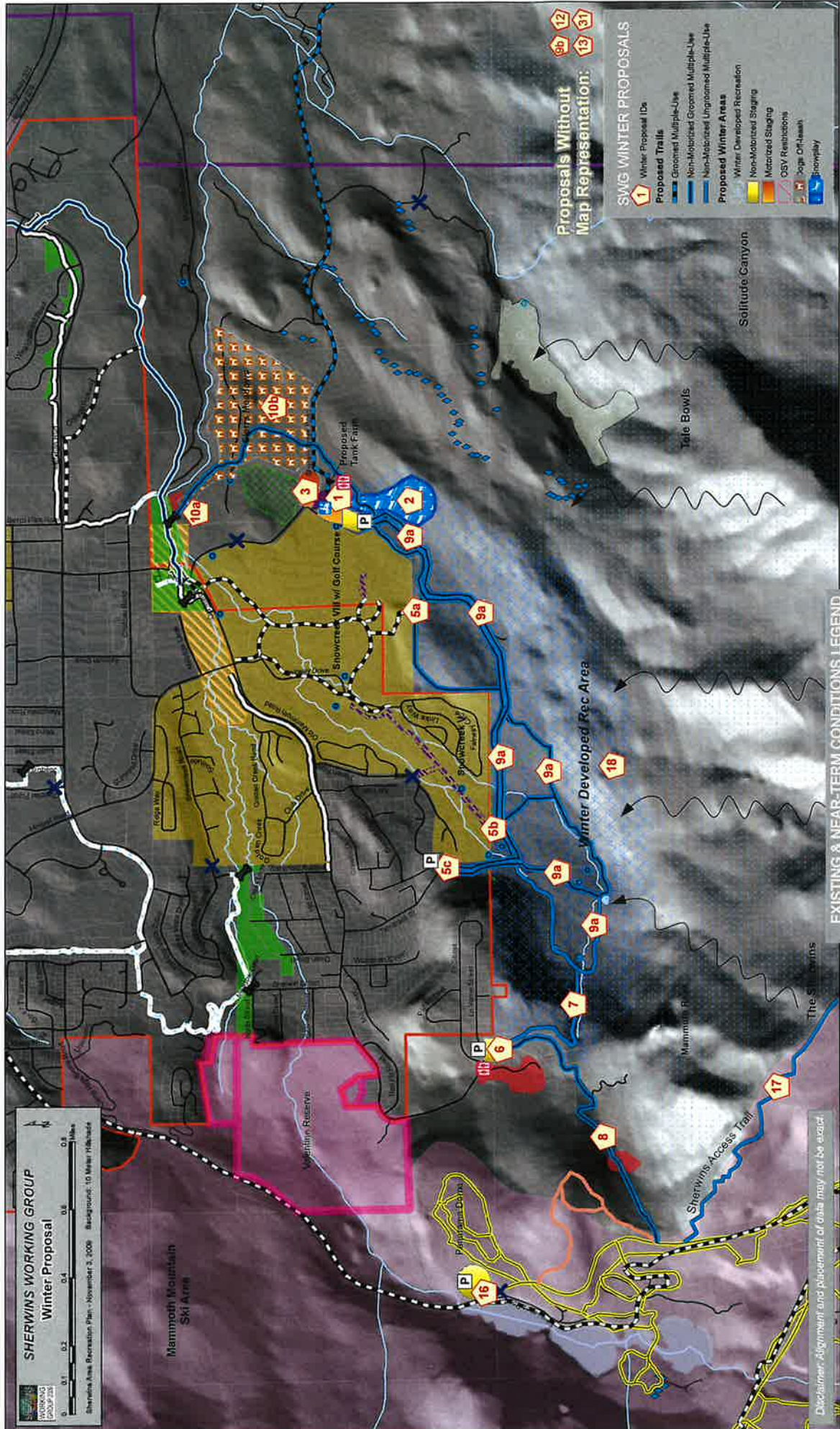
9a

**RATIONALE:** To improve the existing non-motorized opportunities in the meadow (the legacy blue-diamond signage system, as one example), a “stacked-loop” or “nested” trail system with partial grooming will be created to offer multiple route options to a variety of winter users, including a quality groomed cross-country skiing experience. The primary section of trail (aligned over the multi-use path, or MUP, identified in Summer Map ID #7), out from which the smaller nested loops will branch, will connect to the access points identified in Winter Map ID #5a (formal non-motorized access/egress point at Snowcreek VIII), #5b (formal non-motorized access/egress point at the Snowcreek golf course), and #5c (non-motorized trailhead at Tamarack Street), providing consistent and easy access/egress across the area to the loop system, the borrow pit staging area, and points of connection farther north and east. Grooming will provide a packed surface for dog-walkers, snowshoers, pedestrians, cross-country skiers, and others and will allow these users a lengthy maintained-route option. Leaving the western loop ungroomed (but signed) will provide an option for those seeking a more “wild” or “natural” experience.

**SHERWINS WORKING GROUP**  
**Winter Proposal**

Scale: 0 0.1 0.2 0.4 0.6 0.8 Miles  
 Background: 10 Meter Hillshade

Background: November 3, 2009



**Proposals Without Map Representation:** 12, 13, 31

**SWG WINTER PROPOSALS**

**Winter Proposal IDs**

**Proposed Trails**

- Groomed Multiple-Use
- Non-Motorized Groomed Multiple-Use
- Non-Motorized Ungroomed Multiple-Use

**Proposed Winter Areas**

- Winter Developed Recreation
- Non-Motorized Staging
- Motorized Staging
- OSV Restrictions
- Yoga Off-Road
- Showplay

**EXISTING & NEAR-TERM CONDITIONS LEGEND**

- Proposed Tank Pads
- Motorcycle Track
- Term Municipal Boundary
- Town Urban Growth Boundary
- East OBCD RDP
- Huron Rd Estimation
- Parade
- Winter Access - Riprock Meier Plan
- Groomed Chertoz Area
- Streams
- Water Bodies
- Park/Open Spaces
- Valentine Reservoir
- MF Stable
- Borrow Pit
- Fences
- Cultural/Historic Area
- Backcountry (Hill/Trailboard)
- Strove-Covered MUP
- Streets
- Planned Multi-Use Paths
- Existing Tunnels
- Bridges
- Blue Groomed Trail Marker
- Grove/Barnier/Dead Ends
- MCHD Sherwin Area Walls
- Backcountry Area
- OSV Restriction Area
- Snowshoe Trails
- Existing Groomed Fire Trails
- Groomed MUP
- Non-Removed MUP

Disclaimer: alignment and placement of lines may not be exact.

## Sherwins Working Group: Winter Map ID Descriptions



Map ID #	Description
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**CONCEPT:** Developed, partially groomed non-motorized recreation zone extending from the borrow pit staging area (see Winter Map ID #1) to Old Mammoth Road, including the non-motorized snowplay area (Winter Map ID #2), the formal non-motorized access/egress point at Snowcreek VIII (Winter Map ID #5a), the formal non-motorized access/egress point at the Snowcreek golf course (Winter Map ID #5b), the non-motorized trailhead at Tamarack Street (Winter Map ID #5c), the multi-use staging area at Mill City (Winter Map ID #6), the non-motorized connector from the Mill City staging area to Hidden Lake meadow (Winter Map ID #7), and the non-motorized stacked-loop trail system in the meadow (Winter Map ID #9a)  
Define and articulate a developed, partially groomed non-motorized recreation zone as shown on the SWG Winter map extending roughly from the borrow pit staging area south to Mammoth Rock Trail and west to Old Mammoth Road. The Town of Mammoth Lakes Urban Growth Boundary will form the northern boundary.

18

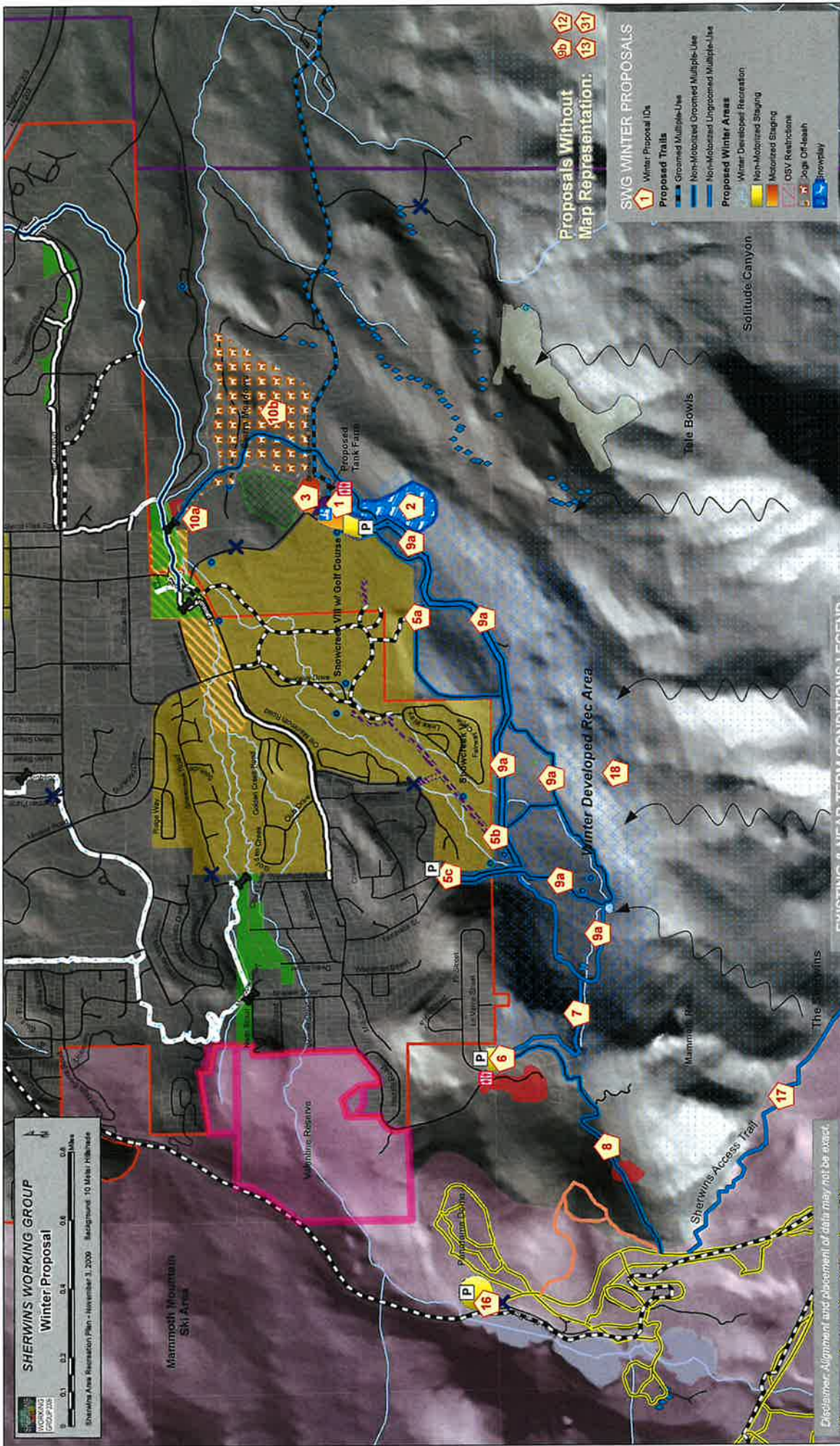
**RATIONALE:** Defining and articulating a developed, partially groomed non-motorized recreation area will offer a “quiet recreation” experience for those who wish to snowshoe, walk, cross-country ski, or enjoy snowplay by providing a sight and sound buffer from OSV use. The establishment of a grooming plan as described in Winter Map ID #9a will preclude motorized use of this area; however, OSV use will continue to be permitted in this area until the grooming plan is established. The location of this zone will allow for direct OSV access to Solitude Canyon via the Tele Bowls. The SWG recognizes that implementation of this feature will likely limit OSV access to the face of the Sherwins; however, the intent is to allow OSV access to Solitude Canyon via a sustainable route that takes into account variable snow conditions and topography and that maintains a clear demarcation between activity areas. Further study is required to determine the exact boundary alignment that will achieve the goals described above.

**CONCEPT: Retain trails depicted as USFS system trails on the Summer map as part of the SWG Winter Proposal**

Retain trails depicted as USFS system trails on the Summer map as part of the SWG’s overall wintertime proposal, including Mammoth Rock Trail, the Panorama Dome trails, and the Sherwin Lakes Trail.

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**RATIONALE:** The SWG did not separately propose or consider trails depicted as USFS system trails on the Summer map while drafting their Winter Proposal, as they assumed that, as official trails recognized as part of the Inyo National Forest inventory, these trails would not be restored or lose system status if not specifically identified in the Winter Proposal. It is the intent and assumption of the group that these trails will remain or become official USFS system trails and will be included as part of their Winter Proposal, regardless of their seasonal use and accessibility.



**Proposals Without Map Representation:** 9b, 12, 13, 31

- SWG WINTER PROPOSALS**
- 1 Winter Proposal ID
  - Proposed Trails
    - Groomed Multiple-Use
    - Non-Motorized Groomed Multiple-Use
    - Non-Motorized Ungroomed Multiple-Use
  - Proposed Winter Areas
    - Winter Developed Recreation
    - Non-Motorized Staging
    - Motorized Staging
    - OSV Restrictions
    - Open Off-leash
    - Snowplay

**EXISTING & NEAR-TERM CONDITIONS LEGEND**

- Existing Tunnels
- Bridges
- Blue Diamond Trail Marker
- Gas/Landmarks/Dead Ends
- MCHD Review Area Walls
- Backcountry Area
- OSV Restriction Area
- Snowshoe Trails
- Existing Groomed Fee Trails
- Groomed MJP
- Snow-Removed MJP
- Snow-Covered MJP
- Streets
- Planned Multi-Use Paths
- Proposed Tank Farm
- Motorized Trail
- Trail Municipal Boundary
- Trail Urban Growth Boundary
- East OSGC NDP
- Rough Rd Easement
- Pavement
- Water Access - Snow/GC Master Plan
- Snowpack Critical Area
- Streams
- Water Bowls
- Partial Open Spaces
- Valentine Reservoir
- HF Stable
- Snowplay Pit
- Fences
- Cultural/Historic Areas
- Backcountry BSG/Unbound

Disclaimer: Alignment and placement of data may not be exact.

LVFPD, and the MLFPD prior to construction. In consultation with the local agencies, the USFS will determine any additional BMPs that shall be implemented. The Fire Protection and Prevention Plan shall include, but not be limited to, the following:

1. Requirement for the number and size of water trucks equipped with 50 feet of fast response hose with fog nozzles that shall be maintained on-site during construction for immediate response to fire incidents
2. Training of all construction workers on fire prevention methods, the proper use of firefighting equipment and procedures to be followed in the event of a fire.
3. Maintenance of fire extinguishers and fire-fighting equipment at each construction site sufficient to extinguish small fires.
4. Definition of appropriate defensible spaces that shall be maintained around permanent structures for acceptable wildland fire protection

There would be no adverse secondary impacts of **Mitigation Measures PHS-1** and **PHS-2**.

### **Recreation**

**Mitigation Measure REC-1:** ORNI 50, LLC shall post informational materials about the CD-IV Project at, but not limited to: nearby recreation sites / campgrounds, access points, the Mammoth Lakes Trail System website, and the Mammoth Welcome Center. This material shall include construction schedules and safety information regarding trucks and other heavy equipment use on local roads and NFSRs, and identify route closures. Signage shall be designed to function during winter and non-winter conditions, and shall be consistent with USFS and Town of Mammoth signage requirements, as appropriate. In addition, construction vehicle speed shall be limited to 15 miles per hour; with temporary signage warning construction vehicles to reduce speeds in areas with blind corners, narrow roads, or hills.

**Mitigation Measure REC-2:** ORNI 50, LLC shall monitor all pipeline routes for evidence of OHV use and if such use is identified, further OHV use shall be prevented through posting of signs and the physical blocking of access, or other restriction measures. ORNI 50, LLC shall also monitor revegetation of pipeline alignments and replant vegetation if necessary.

**Mitigation Measure REC-3:** ORNI 50, LLC shall provide information regarding pipeline crossing locations and road closures at, but not limited to: nearby recreation sites / campgrounds, access points, the Mammoth Lakes Trail System website, and the Mammoth Lakes Visitor Center. Signage shall be designed to function during winter and non-winter conditions, and shall be consistent with USFS and Town of Mammoth signage requirements, as appropriate. In addition, operational vehicle speed shall be limited to 15 miles per hour road and signage shall be installed, consistent with USFS and County requirements. ORNI 50, LLC shall also coordinate with the Town of Mammoth and the USFS to ensure that a Shady Rest OSV staging area and access to the staging area is plowed to provide winter access. In addition, banks formed by road plowing shall be shaped such that crossing grade changes are gradual in areas where cross country use is prevalent.

In addition, implement **Mitigation Measures VIS-1** through **VIS-3**.



### **Socioeconomics and Environmental Justice**

None required.

#### **Traffic/Access/Circulation**

**Mitigation Measure TRA-1:** Prior to construction and/or decommissioning, ORNI 50, LLC shall develop a Coordinated Transportation Management Plan and work with Mono County to prepare and implement a transportation management plan for roadways adjacent to and directly affected by the planned CD-IV Project facilities, and to address the transportation impact of the overlapping construction projects within the vicinity of the CD-IV Project in the region. The transportation management plan shall include, but not be limited to, the following requirements:

1. Coordination of individual traffic control plans for the Project and nearby projects.
2. Coordination between the contractor and Mono County in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address:
  - a. Full and partial roadways closures
  - b. Circulation and detour plans to include the use of signage and flagging to guide vehicles through and/or around the construction zone, as well as any temporary traffic control devices
  - c. Bicycle/Pedestrian detour plans, where applicable
  - d. Parking along public roadways
  - e. Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites
  - f. Repairing and restoring affected roadway rights-of way to their original condition or better after construction and decommissioning are completed, where applicable.
3. Protocols for updating the transportation management plan to account for delays or changes in the schedules of individual projects.

### **Utilities and Public Services**

None required.

#### **Visual/Aesthetics**

**Mitigation Measure VIS-1: Landscape Plan.** Prior to construction, ORNI 50, LLC shall prepare, submit for approval by the USFS, and implement a landscape plan that includes planting of native trees and shrub vegetation at select locations to further screen well site facilities and the geothermal pipeline from view from Sawmill Cutoff Road (NFSR 03S08), Sawmill Road (03S25), Shady Rest Park, U.S. Highway 395, SR 203, and Knolls Loop. The landscape plan shall be coordinated with the revegetation plan (refer to **Mitigation Measure VEG-1**) including a monitoring and reporting plan. Permanent fencing shall be precluded to reduce potential barriers to wildlife. To minimize adverse visual effects from