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Organization: Mammoth Pacific LP/Ormat

Title: Environmental Compliance Coordinator

Comments: Comment Letter Attached

October 20, 2023

Lesley Yen, Forest Supervisor

Inyo National Forest

351 Pacu Lane, Suite 200

Bishop, CA 93514

Subject: Scoping for Over-Snow Vehicle Use Designation

Dear Ms. Yen,

Mammoth Pacific LP/Ormat appreciates the opportunity to provide comments during the scoping period for the Inyo National Forest's Over-Snow Vehicle (OSV) Use Designation. Our comments relate to OSV management in the areas near our geothermal infrastructure: wells, pipelines, access, and power generation facilities. These recommendations aim to improve recreationalist safety, the safety of our employees and infrastructure, and reduce conflicts.

We offer the following comments and recommended modifications to the proposed action including maps:

Modification of Proposed Groomed OSV Trail route from the new OSV Trailhead at Hwy 203/ Sawmill Cutoff Road:

Ormat requires year-round access to our production wells near Shady Rest Park, which includes winter plowing of access roads to three sites. The Bureau of Land Management plows access roads to two other monitoring well sites at least once-per-season to conduct well monitoring. Geothermal pipeline infrastructure is present north, west, and east of Shady Rest Park. The pipeline is often runover by OSVs, even when marked with snow stakes, resulting in damage to the pipeline insulation and the potential for an OSV to encounter a valve when crossing on top of the pipeline. We recommend modification of the groomed OSV trail route from the proposed new OSV trailhead along an existing road that avoids these features. Rerouting the groomed OSV trail will reduce safety hazards and avoid infrastructure, plowing, and user conflicts.

Modification of the Groomed A Trail Route:

With recommended modification to the groomed OSV route from the proposed new OSV trailhead location, a modification to the groomed A Trail route is recommended. Instead of the trail beginning at Shady Rest Park, we recommend it start where our suggested modified groomed OSV route meets up with Sawmill Cutoff Road or start at the OSV trailhead itself.

ormat@ormat.com ormat.com

Modification of the area "Closed to OSV Use" South of Shady Rest Park:

Complete closure of the area south of Shady Rest Park to OSV use does not seem warranted. Modifying the area instead to a "Restricted Off-Trail OSV Use" designation

rather than a full closure would meet the same objectives, while still allowing OSV use on designated OSV trails. Designated OSV trails can be added to meet any future needs.

Addition of "Restricted Off-Trail OSV Use" Area:

Due to the challenges previously described with OSVs running over the geothermal pipelines, we recommend extending the "Restricted Off-Trail OSV Use" Area to the east to include the geothermal pipelines near the intersection of Sawmill Road and Hwy 203 and north to include the remaining pipeline and well sites. Restricting OSV use to groomed and ungroomed designated OSV trails, will increase safety and reduce infrastructure conflicts.

Addition of Designated Ungroomed OSV Trails within recommended "Restricted Off-Trail OSV Use" Area:

To accommodate OSV access to open riding areas through the recommended "Restricted Off-Trail OSV Use" Area, we recommend adding Designated Ungroomed OSV Trails along a portion of Sawmill Road and to the east across the pipelines. This will allow for safe access through the restricted area to open riding opportunities.

Recommended 15 mph Zones:

The Forest Service has designated 15 mph zones along trails that host both motorized and non-motorized recreationalists to provide for safety near Shady Rest Park. Ormat recommends including 15 mph zones along the recommended modified groomed OSV route from the proposed new OSV trailhead location. We also recommend adding 15 mph zones along the recommended Designated Ungroomed OSV Trails within the recommended "Restricted Off-Trail OSV Use" Area.

East of Hwy 395:

OSV use east of Hwy 395 near Ormat's power generation facilities has not created significant operational conflicts. Ormat plows snow off Antelope Springs Road north of the turnoff to our entrance gate on Casa Diablo Cutoff to accommodate OSV staging beyond the turnoff. This informal staging area is used by recreationalists regularly throughout the winter with minimal issues. Ormat recommends no modifications to the proposed action east of Hwy 395 near our facilities.

Included with these scoping comments are KMZ files of the recommended additions and modifications. Thank you for considering these comments.

Sincerely, Mammoth Pacific LP/Ormat
PO Box 1584
Margie DeRose
94 Casa Diablo Cutoff
Environmental Compliance Coordinator
Mammoth Lakes, CA 93546

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Legend

Map 1

Existing Plowed Paved Road

OSV Designation Planning

Existing Plowed Well Access Road

Geothermal Pipeline

NEW - Shady Rest

Nordic Trails

Plowing Once-Per-Season for Well Monitoring

Recommended 15mph Zone
Recommended Modified A Trail
Recommended Modified Groomed OSV Trail
Recommended Restricted Off-Trail OSV Use
NN
3000 ft
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Legend
Map 2
Existing Plowed Paved Road
OSV Designation Planning
Existing Plowed Well Access Road
Geothermal Pipeline
NEW - Shady Rest
Once-Per-Season Monitoring Well Plowing
Recommended 15mph Zone
Recommended Modified A Trail
Recommended Modified Groomed OSV Trail
Recommended Restricted Off-Trail OSV Use
Recommended Ungroomed OSV Trail
Nordic Trails
NN
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