

California Department of Transportation

DISTRICT 9
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December 26th, 2022

Lesley Yen
Forest Supervisor [C/O Fed Wong]
Mammoth Lakes District Ranger
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Dear Lesley Yen:

Thank you for giving the California Department of Transportation (Caltrans) District 9 the opportunity to review/comment on the Notice of Preparation (NOP) and Notice of Intent (NOI) for the Mammoth Lakes Main Lodge Redevelopment project.

Attached are Caltrans' comments covering the following areas: traffic, maintenance, right-of-way, transportation planning and environmental analysis. Caltrans requests these areas be addressed in the EIR/EIS and related technical studies.

We value our cooperative working relationship with the US Forest Service and the Town of Mammoth Lakes regarding development of the public transportation system. Caltrans would like to offer coordination on scoping/review methodologies for the project development and technical studies. For any question or comments, feel free to contact me at (916) 605-8034, Neil.Peacock@dot.ca.gov.

Sincerely,

Neil Peacock

NEIL PEACOCK
Supervising Transportation Planner
Planning & Modal Programs Manager (Acting)
Offices of Transportation Planning, Local Assistance and Environmental

c: Sandra Moberly, Community and Economic Development Director, Town of Mammoth Lakes [P.O. Box 1609, Mammoth Lakes, CA 93546]

Lesley Yen, Forest Supervisor
December 27, 2022
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Attachment: Caltrans District 9 – Response to NOP/NOI for mammoth Mountain Main
Lodge Redevelopment Project

Caltrans District 9 - Response to NOI/NOP for Mammoth Mountain Main Lodge Redevelopment Project

Thank you for giving the California Department of Transportation (Caltrans) District 9 the opportunity to review/comment on the Notice of Preparation (NOP) and Notice of Intent (NOI) for the Mammoth Lakes Main Lodge Redevelopment project. Below you will find is a preliminary list of items that Caltrans requests the US Forest Service (USFS) and the Town of Mammoth Lakes (TOML) to address in the Environmental Impact Report/Environmental Impact Statement to be prepared for the proposed project.

- Traffic

1. Transportation Impact Study (TIS)

Caltrans would appreciate an opportunity for early coordination to scope the methodologies used to identify project impacts in the TIS. Review of and a chance to comment on the draft TIS are also requested. The TIS should address the following:

- a) Analysis of expansion/changes to parking for employees, visitors, vendors, and transit.
- b) How many new crosswalks, driveways and/or road connections to the existing and proposed State Route (SR) 203 alignment are proposed?
- c) How will geometric design concerns be addressed in project alternatives? These include, but are not limited to truck turn templates, sight distance at road connections, horizontal and vertical geometric requirements, clear recovery and shoulder requirements.
- d) How will the TIS address weekend, weekly and seasonal variations in travel patterns that will impact travel demand and transit service?
- e) What are the expected changes to transit patterns and needs? This includes, but is not limited to, transit facilities, stops, shelters, buses, services, charging/refueling stations and ITS operational interfaces.
- f) During construction and after redevelopment completion what unique vehicles and/or goods delivery loads are anticipated to use highway facilities and rights-of-way? These include, but are not limited to, loading/unloading zones, oversized/overlong permitted loads, logging trucks, USFS specialized equipment, construction staging/parking, and crane/hoist operations.
- g) How will the redevelopment maintain emergency response vehicle access?
- h) What evacuation plans are proposed for construction and post-construction?
- i) What are the proposed plans for parking, transit stops, loading zones (commercial, pedestrian), transportation network companies (Uber) and delivery companies (UPS)?
- j) There is currently only one alternative presented for the SR 203 realignment. Other alternatives should be considered, such as routing the highway around the back of the development area (Parcel A) and/or keeping the current alignment with underpass/overpass structures.

- Maintenance

1. According to the preliminary scoping documents it looks like additional miles (feet) of highway will need to be plowed during the winter months. How will the redevelopment address the additional need for snow plowing, snow storage and operations of snow plowing equipment?
 2. There will need to be new or altered maintenance agreements for plowing and other maintenance activities (i.e., landscaping, street sweeping). How will these needs be accommodated?
- Right-of-Way
 1. Caltrans requests the development of additional SR 203 realignment alternatives (see Environmental below). Planned alterations to each alternative for the State highway right-of-way will need to be identified. These include, but are not limited to, road connections, driveways, utilities/drainage and highway realignments, etc.
 2. What new, additional, and/or relocated utilities are required (i.e., telecommunication, power, water, sewer, etc.)?
 3. How will existing and future highway easements be addressed?
 - Transportation Planning
 1. Will transportation demand, VMT reduction, and community transportation equity concerns be addressed by the inclusion of workforce-appropriate affordable housing or other methods?
 2. What climate adaptation strategies will be used in planning, designing, and constructing the various features of the redevelopment?
 3. Do proposed build alternatives and various project features conform to the TOML's General Plan and/or other Specific Plans?
 4. Will there be various planned phases of construction? Please identify what these would be.
 5. Is an independent highway realignment/relinquishment feasibility study planned to supplement the EIS/EIR? If so, Caltrans requests early coordination with this study.
 - a) <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter25-a11y.pdf>
 6. How will complete street context sensitive features be included in the highway realignment portion of the project?
 - Design
 1. All project alternatives will need to conform to the Highway Design Manual. Any exceptions to these standards will need to be approved by Caltrans.
 - a) <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>
 2. Any required encroachment permits will need to address all geometric design features and include design decision documents to address all non-standard features.
 - Environmental
 1. As Caltrans is a responsible agency under and the California Environmental Quality Act (CEQA), it would be useful to engage in early coordination with Caltrans District 9 Environmental staff to ensure regulatory compliance with applicable State laws, statutes, and executive orders. These include topic areas described in CEQA Appendix G. The following environmental subject areas are of specific interest to Caltrans:

a) Alternatives Evaluation

- i. *An Environmental Impact Report for this type of project would typically evaluate multiple alternatives. Caltrans suggests adding additional build alternatives to be evaluated before the selection of one preferred alternative.*

b) Biology

1. How will impacts to drainages and water resources be evaluated and delineated? Are CDFW Lake Streambed Alteration Agreement, Water Board 401 Certification, US Army Corps. 404 Permits anticipated? Please describe any minimization and mitigation for permanent and temporary impacts to jurisdictional water resources.
2. Describe avoidance measures for the introduction of invasive and non-native plant species during construction in newly disturbed soil areas, including any erosion control seeding be applied to disturbed soils or native seed be applied to disturbed soils with post-construction monitoring of revegetation success targets.
3. How will potential impacts to wildlife connectivity from re-routing State Route 203 be evaluated? If necessary, how will significant impacts be mitigated?
4. Evaluation of impacts to and avoidance and minimization measures for multiple species will be required. Caltrans would like to coordinate on methodologies for the following species:
 - a. Nesting and migratory birds. Nesting season can extend from February 15-September 30 in the Eastern Sierra and impacts to active nests must be avoided.
 - b. Sierra Marten and Pacific Fisher. Will a den tree survey be conducted to ensure active dens are not within or adjacent to the impact area of the project?
 - c. Sierra Nevada yellow-legged frog.
 - d. Rare plants. Appropriate blooming periods need to be taken into consideration to ensure presence of rare plants can be verified.
5. Will a tree survey be conducted by a licensed Forester? Species, DBH (Diameter-at-breast-height), and percent cover should be included in mapping and inventorying of trees that may be impacted from the project. Will a plan be developed for replacement plantings and/or restoration to be conducted with appropriate success criteria goals?
6. Is a CDFW Incidental Take Permit and/or USFWS Biological Opinion anticipated for any species or habitat?
7. Is biological construction monitoring anticipated on-site during all construction activities to ensure commitments for biological resources are implemented and violations are avoided?

c) Cultural and Tribal resources/coordination

1. Projects that are on or have potential to affect historic properties owned by Caltrans or within our jurisdiction are subject to PRC

5024. Please coordinate with the District 9 cultural resources staff to address what studies and/or documents needed to meet our responsibilities for compliance with PRC 5024 under Caltrans' PRC 5024 MOU with SHPO. There could be potential for buried cultural resources within the Caltrans ROW. The potential for SR 203 itself to be a Caltrans-owned historical resource should also be considered.

Caltrans District 9 staff looks forward to continuing to work closely with the USFS and TOML on all developments of the public transportation system. We anticipate hearing from all major project proponents in the near future regarding our concerns/issues and scheduling inter-agency project team meetings.