

Data Submitted (UTC 11): 12/22/2022 4:09:40 PM

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Comments: December 22, 2022

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

Re: Mammoth Mountain Main Lodge Redevelopment Project

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

Dear Forest Supervisor Yen,

Thank you for the opportunity to provide scoping comments in response to the Notice of Intent for the Mammoth Mountain Main Lodge Redevelopment Project. Winter Wildlands Alliance (WWA) is a national non-profit organization whose mission is to inspire and empower people to protect America's wild snowscapes. Our alliance includes 34 grassroots groups in 16 states, including groups with a specific interest in this project such as Friends of the Inyo, and has a collective membership exceeding 130,000. Many of our members ski and snowboard at Mammoth Mountain and also recreate by a variety of means on public lands and in backcountry areas that would be impacted by the project as proposed.

We understand that a significant portion of this proposed development project will occur either on private property or within existing Special Use Permit boundaries. Our primary concern is that elements of the Proposed Action may impact natural resources, watersheds, viewsheds, wildlife and equitable public access to non-fee-based recreation opportunities on public lands outside and beyond the existing Special Use Permit Area.

Purpose and Need

We appreciate the specific reference in the Project Proposal Letter to the Inyo National Forest's recently revised Land Management Plan (LMP) and, specifically, to the desired conditions for Destination Recreation Areas and General Recreation Areas. We look forward to seeing robust analysis in the environmental impact statement (EIS) regarding how the proposed project will meet not just the two cited, but also the whole range of desired conditions articulated in the LMP for the public in these areas, including, for example: "Traffic and parking does not negatively impact visitor experience;" "Scenic integrity is maintained at or enhanced from current conditions;" "Places for people seeking natural scenery and solitude are available;" "Conflicts between different uses are infrequent;" and "As new forms of recreation activities emerge, recreation settings retain their natural character."

Unfortunately, as proposed, the project-including a proposed SUP boundary expansion onto undeveloped public land-seeks to "improve [MMLR's] recreational offerings" for its paying guests at the direct expense of the non-paying general public who stand to lose equitable direct access to public lands and non-fee-based recreation opportunities in this area. This inequity is made clear in the Purpose and Need statements in the Project Proposal Letter, where there is no mention whatsoever of public benefit (or impacts thereto) but only to the benefit of MMSA's paying clientele:

The purpose of the proposed action is to enhance the guest experience of MMSA's day-use and overnight

clientele.

The proposed action is needed to:

1. Renew and improve guest services, guest circulation, accommodations, and portal staging capacity in the Main Lodge Base area;
2. Expand guest services offerings to meet increased demands; and
3. Offer learning progression opportunities for lower ability level skiers through enhanced skier services, improved terrain, and additional lifts.

The NEPA and CEQA processes must first and foremost establish that there is in fact benefit to be derived for (and no significant impact to the needs of) the whole American public by the development and commercialization of public lands-not just for those who can afford to buy lift tickets from MMSA.

National Policies

The Ski Area Outdoor Recreation Enhancement Act (SAOREA) and Forest Service Manual (FSM) provide direction on what activities and developments are permissible concerning ski areas operating on Forest Service lands. Under SAOREA, "Each activity and facility authorized...shall (A) encourage outdoor recreation and enjoyment of nature; (B) to the extent practicable (i) harmonize with the natural environment of the National Forest System land on which the activity or facility is located; and (ii) be located within the developed portions of the ski area" SAOREA also mandates that authorized activities and facilities shall encourage outdoor recreation and enjoyment of nature. As this EIS is developed, we encourage the Forest Service to consider the ways in which proposed facilities "harmonize [or not] with the natural environment," and also that not all activities that occur outside necessarily further the enjoyment of nature and to be discerning in determining what types of infrastructure fit within this restricted category.

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." Given the increased emphasis on summer activities operated by Mammoth Mountain in the Main Lodge Base Area, as well as the importance of the Main Lodge area as the only parking and transit hub for public access to the Reds Meadow/Devils Postpile shuttle bus service, we do not see any legitimate reason for further development outside the resort's existing Special Use Area permit boundary. On the contrary, all public lands outside the permit boundary should remain undeveloped and accessible to the general public for non-fee-based snow sports, hiking, mountain biking and other summer activities.

FSM §2343.14(1)e1 states that recreation and facilities at ski areas must harmonize with the natural environment of the site where they would be located by being visually consistent with or subordinate to the ski area's existing facilities, vegetation and landscape. Based on the maps provided with the scoping notice, it appears that many of the facilities and structures listed in the Proposed Action will visually dominate the landscape. The EIS must include a viewshed analysis that considers how new infrastructure - including ski lifts, ski runs, restaurants, parking lots and other facilities - will be visible from the surrounding area. This viewshed analysis can help the Forest Service to determine whether any of the proposed new development is consistent with the ski area's existing facilities, vegetation and landscape.

FSM 2343.14(1)g directs that activities and associated facilities at ski resorts increase utilization of snow sports facilities and not require extensive new support facilities, such as parking lots, restaurants, and lifts. The development plans in the proposed action include considerable new support facilities, roads, parking lots and restaurants. The EIS must consider and address how an expansion of the existing permit area in order to accommodate such development conflicts with FSM direction.

Special Use Permit Area Boundary Expansions

As you develop the EIS, we urge you to develop a wide range of diverse alternatives that will provide you with the necessary information to make a decision that is satisfactory for all stakeholders and respectful of the unique natural environment in which Mammoth Mountain Ski Area is located. At least one of these alternatives - beyond the no action alternative - should not include any expansion of the permit boundary.

Public Access and Equity

As stated above, we have deep concerns that the development as proposed would significantly reduce equitable public access to public lands along the Highway 203 corridor. This is especially true in winter, when public access to the popular Minaret Vista lookout - by snowmobile, backcountry skis, Nordic skis, snowshoes, or other means - is already severely limited by crowding and parking issues caused by the thousands of MMSA clientele seeking access to chairlifts and base facilities. It is already nearly impossible for a member of the public to park within reasonable walking distance of the public winter trailhead to Minaret Vista. How will this be improved by further commercial development and the re-routing of Highway 203 in this area?

The EIS must discuss how each alternative would, or would not, affect access to and other uses of public lands aside from resort skiing and related commercial activities. It must be noted that backcountry skiing is by far the fastest growing segment of the snow sports industry, followed closely by snowshoeing and cross-country skiing. Meanwhile, resort skiing participation numbers have remained essentially flat over the last thirty years, and have recently even declined by as much as 6% - as the price of resort skiing has risen beyond the means of most Americans. The EIS should include a thorough examination of these trends. As part of this EIS, we also request that the Forest Service collect data to understand past and current backcountry and other non-fee-based recreational use in the proposed expansion areas as well as to model projected future use in these areas if elements of the Proposed Action are or are not implemented.

Integration with Travel Management Planning

The Inyo National Forest (INF) has announced its intention to publish a separate Proposed Action in early 2023 to initiate a Subpart C Travel Management Planning project for Over-Snow Vehicle designation and other winter recreation use on the forest. The INF has already held two pre-scoping meetings and also participated in a robust Collaborate Action Team effort to help inform this Proposed Action. As part of this latter effort, significant concern was noted among the whole variety of stakeholders concerning public access to Minaret Vista, Reds Meadow/Devils Postpile, the Owens River Headwaters Wilderness, the lower Dry Creek drainage, Earthquake Fault and Earthquake Dome. In order to achieve a final winter recreation plan that makes sense for all stakeholders and ensures equitable access for the whole public to a wide range of recreation opportunities, the planning process for this development project must be thoroughly integrated with the concurrent travel management planning process.

Cumulative Environmental and Climate Impacts

Any ski resort expansion has long term effects on the public lands that are developed, as well as on adjacent lands. These effects can outlive the resort itself. Meanwhile, our winters are changing rapidly - snow packs are becoming less reliable, and "skiable" snow is moving up in elevation. The EIS must include climate and snowpack projections to help the Forest Service, the public, and the resort understand if the areas being considered for expansion will remain viable for winter sports far into the future. If projected temperatures and snowpack for these areas under scientifically-valid future climate scenarios are not amenable to supporting ski resort operations, then there is no reason to permit expansion. Furthermore, it must be considered in the EIS that both the Federal Administration and the State of California have issued Executive Orders calling for more durable protections for at least 30% of public lands and waters within the next 7 years. Building new parking lots and roads on undeveloped public land moves us in precisely the opposite direction.

Other important concerns that must be thoroughly addressed in the EIS include but are not limited to: auditory and visual impacts to Wilderness, impacts to viewsheds, watersheds, water resources, forest health and dark skies. Finally, the EIS must carefully consider how the Proposed Action and other alternatives will impact wildlife. These analyses must consider cumulative impacts from existing activities associated with the resort in addition to impacts related to proposed alternatives in the EIS.

We look forward to continuing to engage with you throughout this process, and to reviewing the draft EIS upon its publication.

Sincerely,

David Page
Executive Director
Winter Wildlands Alliance