



MAMMOTH MOUNTAIN SKI AREA
SNOWMAKING AND WOOLLY'S ADVENTURE SUMMIT PROJECTS
NOTICE OF PROPOSED ACTION FOR SCOPING AND COMMENT PERIOD

February 2020



USDA Forest Service
Pacific Southwest Region
Inyo National Forest



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Comments Welcome

The Inyo National Forest welcomes your comments on the proposal to initiate an Environmental Assessment (EA) process for the Mammoth Mountain Ski Area (MMSA) *Snowmaking and Woolly's Adventure Summit Projects*. The United States Forest Service (Forest Service) will complete an EA that will be used to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). Instructions for submitting comments are described on the last page of this document. The content of this Notice of Proposed Action (NOPA) is available online on the [project website](#).

This NOPA has been prepared to solicit public comments in response to the Purpose and Need for Action, the Proposed Action, and potential alternatives to the Proposed Action. Potential effects of the Proposed Action on the human and biological environment will be analyzed and disclosed in an EA, which will consider public comments received in response to this NOPA. If the Forest Service determines there are no significant impacts, the EA, along with a draft Decision Notice and FONSI will be published for a 45-day objection period. If no specific written comments are received during this designated opportunity for comment, the project will not be subject to objection. Following the 45-day objection period, the Forest Service will publish a final Decision Notice and FONSI. If the EA concludes there is potential for significant impacts, an EIS will be prepared.

Please note that this 30-day period is serving as both scoping and the sole comment period for the Proposed Action. There will not be another opportunity to comment.

Background

The 2019 [Inyo National Forest Land and Resource Management Plan](#) (Forest Plan) allocates the MMSA special use permit (SUP) area as a *Destination Recreation Management Area*. The theme identified for *Destination Recreation Management Areas* in the 2019 Forest Plan states, that *Destination Recreation Management Areas* "have high levels of recreation, supported by more facilities, amenities, and services than other areas" (USDA Forest Service 2019). In accordance with this emphasis on developed recreation within *Destination Recreation Management Areas*, MMSA proposes to expand and improve its recreational offerings with the Proposed Action. The Proposed Action, including snowmaking expansion, and winter and summer upgrades at Woolly's Adventure Summit, have been reviewed for consistency with all relevant management direction provided by the 2019 Forest Plan.

SNOWMAKING

MMSA is known for its world-class ski terrain and snow conditions. With increased climatic variability due to environmental factors such as precipitation and temperature, snowmaking has become an essential part of meeting the growing expectations of guests. The snowmaking system is fundamental in ensuring a predictable opening date, high quality conditions during the early- and mid-season, and reliable conditions throughout the season. MMSA aims to provide consistent snow conditions for their guests by expanding its existing snowmaking infrastructure to ensure adequate snow coverage throughout the ski season.

MULTI-SEASON RECREATION

Woolly's Adventure Summit is a 55-acre recreation area located in the northeast corner of the MMSA SUP boundary, below the bottom terminal of Chair 7 and separated

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from ski terrain by State Highway 203 (refer to **Figure 1**). The area has been used for snow play and winter recreation since it was permitted to Bobsledz International, Inc. in 1991. MMSA acquired in the area in 2011 in order to offer similar winter recreation opportunities and provide additional multi-season recreation opportunities to visitors of the Inyo National Forest.

Woolly's Adventure Summit currently serves as a destination for winter recreation opportunities such as snowtubing and snow play activities. In order to improve the winter recreation experience offered at Woolly's Adventure Summit, MMSA aims to implement projects to expand their existing snowtubing and snow play infrastructure.

While Woolly's Adventure Summit currently serves as a destination for winter activities, MMSA now proposes to implement additional recreational activities that would span both the summer and winter seasons. The 2011 Ski Area Recreational Opportunity Enhancement Act (SAROE) amended the National Forest Ski Area Permit Act of 1986, enabling snow sports (other than Nordic and alpine skiing) to be permitted on National Forest System (NFS) lands subject to ski area permits issued by the Secretary of Agriculture. The act also clarifies the authority of the Secretary of Agriculture to permit appropriate additional seasonal or year-round recreational activities and facilities on NFS lands subject to ski area permits issued by the Secretary of Agriculture. Appropriate seasonal or year-round recreational activities must qualify under screening criteria including a requirement that the activities do not change the primary purpose of the ski area to activities other than snow sports. As Woolly's Adventure Summit is located across State Highway 203 from MMSA and does not interfere with existing ski area infrastructure or terrain, it is well suited to accommodate summer recreation activities.

Purpose and Need for Action

The purpose of the snowmaking expansion project is to ensure timely opening of the resort as well as provide adequate snow coverage on key trails. The expanded snowmaking infrastructure would enhance the reliability and consistency of the skiing surface in response to site-specific operational concerns, guest expectations, and increased variability in climatic conditions like precipitation and temperature. The proposed snowmaking upgrades would provide relief against these environmental concerns by implementing low air consumption/low energy fan guns that would improve production rates and seasonal utilization of utilities/resources. The snowmaking component of the project is fundamental in ensuring a predictable opening date and providing adequate snow coverage throughout the season.

The purpose of the winter upgrade projects at Woolly's Adventure Summit is to increase operational aspects of the snowtubing facility and snow play area, and to provide improved winter recreation opportunities for children and non-skiers. In addition, the tubing lanes would be realigned to a west-to-east aspect from the current south-facing aspect in order to ensure adequate snow coverage throughout the season.

The purpose of the summer upgrades at Woolly's Adventure Summit is to expand the nature-based recreation opportunities available at MMSA and provide activities that are available to a wider spectrum of guests during all seasons of the year. There is a growing demand for summer outdoor recreation activities at ski areas nationwide, which is particularly evident in California. Summer recreation activities have evolved to include a considerable variety of opportunities and visitor experiences. MMSA currently provides a number of activities that cater to users with outdoor experience and

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skills (e.g., mountain biking and hiking trails) but needs to better accommodate visitors who may not possess the requisite level of skills or experience to engage in those activities. By offering experiences inclusive of these visitors, MMSA believes this would enable a wider spectrum of guests to engage in nature-based experiences, as well as encourage new users to visit and experience the National Forest in a safe and managed context.

There is a need for a broad and diverse mix of multi-season recreational activities that collectively provide the public with a range of outdoor experiences from passive to active, intimate to interactive, and serve a range of personal interests, skills, and abilities among guests. In order to meet guest expectations, there is also a need to provide a reliable snow surface and adequate coverage throughout the season, while ensuring a predictable and timely opening date.

Proposed Action

A detailed description of the individual project components follows. Each project component meets the Purpose and Need described above. **Figure 1** shows the existing conditions within the project area(s), and **Figure 2** and **Figure 3** show the Proposed Action. Pending Forest Service approval, MMSA anticipates that construction could begin during the summer of 2020.

To continue to provide a recreation experience consistent with guest expectations and cater to a wider spectrum of users, MMSA proposes to:

- ◆ Install additional snowmaking coverage on 206 acres of existing ski trails within the SUP area;
- ◆ Realign and widen the winter snowtubing facility and install 500-foot magic carpet at Woolly's Adventure Summit;

- ◆ Expand the existing snow play area at Woolly's Adventure Summit;
- ◆ Expand the existing parking lot at Woolly's Adventure Summit and create a transit stop;
- ◆ Construct a mountain coaster at Woolly's Adventure Summit;
- ◆ Construct a zip coaster at Woolly's Adventure Summit;
- ◆ Construct two adventure challenge ropes courses and one modular junior challenge ropes course at Woolly's Adventure Summit;
- ◆ Relocate Mammoth Snowmobile Adventures at Woolly's Adventure Summit; and
- ◆ Construct a 3,000-square foot base lodge facility at Woolly's Adventure Summit.

All components of the Proposed Action would occur within MMSA's existing SUP area and are depicted on both **Figure 2** and **Figure 3**. A combination of hand crews and heavy equipment would be used to implement all of the above actions. All ground disturbance and staging associated with the proposal would be confined to the existing SUP area. Each component of the Proposed Action is detailed in this NOPA.

SNOWMAKING

MMSA proposes to provide an additional 206 acres of snowmaking coverage via the proposed upgrades depicted in **Figure 2**. Proposed snowmaking pipelines and associated coverage would occur on the following existing ski trails: *Back for More, Bottom of 22, Canyon Connector, Christmas Tree, Dry Creek, Hully Gully, Juniper, Lost in the Woods, Manzanita, Milk Run, New Critters, Ponderosa, Quicksilver/Lower Gold Hill, Red Wing, Repeat 22, Rock Garden, Roller Coaster West, Roma's Road (and Back Ramp of 5), Round Robin (Lower), Secret Spot/Critters, Side Ramp of 11,*

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Ski Back Trail, Spring Canyon, St. Anton, Terry's, Top of 21, Tower 7 Cutoff, Wall Street, and Water Tank. Snowmaking is proposed on this terrain to improve skier circulation and provide guests with a satisfactory ski experience during the early season and years with poor natural snow.

To accommodate the additional snowmaking coverage that is proposed, MSMA proposes to install approximately 14 linear miles of snowmaking lines in existing ski runs. The improved snowmaking system will utilize low air consumption/low energy fan guns in order to decrease operational costs and increase production rates and seasonal utilization of utilities/resources. Additionally, to increase on-mountain water storage, MMSA proposes to expand the perimeter of their existing snowmaking pond by approximately 200 feet and excavate it to a depth of approximately 25 feet. To ensure that adequate water volume is available to refill the snowmaking pond and replenish the aquifer, MMSA proposes to drill two new wells, located near the existing Well 8 and the existing compressor building (refer to **Figure 2**).

Installation of proposed snowmaking lines would be located on previously disturbed ski trails and involve the excavation of a trench approximately 4 feet wide by 4.5 feet deep, which would require an approximately 40-foot disturbance corridor. A combination of hand crews and an excavator would be used to perform the majority of work. Expansion of the snowmaking pond would entail the use of heavy excavation equipment to widen and deepen the catch basin. Any excess backfill generated at the pond expansion area would be recontoured as berms along the perimeter of the pond. To the greatest extent possible, MMSA would use existing routes and previously disturbed ski trails to access the project area; however, temporary access roads would be necessary in order to reach portions of the snowmaking supply line. Following construction, all temporary access

roads would be revegetated with native, certified weed-free seed. Equipment and materials would be staged on existing parking areas, ski trails and previously disturbed areas in the ski area permit boundary.

As detailed in **Table 2**, the additional withdrawals for snowmaking are not anticipated to negatively impact the aquifer volume. Water sufficiency and changes to aquifer recharge rates associated with the Proposed Action, will be further analyzed using an updated version (in progress) of previous groundwater modeling that that has been completed for the Dry Creek drainage. The updated model will assess current precipitation/recharge, pumping, and groundwater-level data from multiple sources.

SNOWTUBING

MMSA proposes to realign and widen the existing winter tubing lanes at Woolly's Adventure Summit (refer to **Figure 3**). The tubing lanes would be realigned to a west-to-east aspect from the current south-facing aspect in order to ensure adequate snow coverage throughout the season. The tubing lanes would be lengthened from 500 feet to 700 feet and widened from six to nine lanes. Soil from excavation would be used as fill material for existing portions of the snowtubing area that will no longer be operational. Excess fill material from the snowtubing improvement project would be placed on Schoolyard, which was previously approved for up to 44,600 cubic yards of fill materials in the 2007 Decision Memo for Schoolyard Ski Run, Fill and Grading Project (2007 Decision Memo). In addition, MMSA proposes to install an approximately 500-foot-long magic carpet to transport guests from the bottom to the top of the tubing lanes. Plastic tube lanes would be installed in the summer months for year-round use of this activity. The proposed snowtubing improvement project would

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require approximately 4.7 acres of grading on previously disturbed land.

PARKING

MMSA proposes to expand on-site parking to the east and west of the existing parking lot at Woolly's Adventure Summit (refer to **Figure 3**). The proposed parking expansion would create 72 additional parking spaces for a total of 179 parking spaces. While skiers may choose to park in this lot, the parking expansion is intended to serve users of the Woolly's Adventure Summit and Snowmobile Adventure Tours. Implementation of parking for users of the Snowmobile Adventure Tours is currently needed, as many visitors park on the side of State Highway 203. A driveway would be constructed to the west of the existing parking lot to allow for transit (bus) circulation and a transit stop outside the State Highway 203 right-of-way and adjacent to the proposed base lodge facility. The proposed driveway would adjoin the existing FS Road 03S27 which connects to State Highway 203. Ground disturbance would be required in areas of expanded parking.

MMSA would work with Caltrans to address increased circulation through the intersection of FS Road 03S27 and State Highway 203, as it is currently difficult to turn onto State Highway 203 from FS Road 03S27 due to limited visibility. Appropriate measures may include the implementation of increased signage and management of snowbanks to reduce their height and improve driver visibility.

In addition, MMSA proposes to extend permanent underground utilities including gravity sewer, propane, telecommunications, and snowmaking supply to the area from MMSA's Vehicle Maintenance Garage which is located south across State Highway 203 (refer to **Figure 2** and **Figure 3**). Excess fill

material from the project would be placed on Schoolyard, which was previously approved for up to 44,600 cubic yards of fill materials in a 2007 Decision Memo.

SNOW PLAY

MMSA proposes to expand the existing winter snow play area by utilizing the remaining lower portion of the existing tube lanes vacated by the proposed snowtubing realignment project (refer to **Figure 3**). All construction activities would occur on previously disturbed land. The snow play upgrade would include an approximately 100-foot-long magic carpet to transport guests from the bottom to the top of the snow play area for sledding and other activities.

MOUNTAIN COASTER

MMSA proposes to construct a mountain coaster on the previously disturbed former snowtubing corridor (refer to **Figure 3**). The coaster would extend to the upper elevation of the Woolly's Adventure Summit area with an approximately 1,900-foot-long climb and then follow the natural terrain on a 3,200-foot-long gravity descent. The descent would fall along an approximately 11 percent average grade and include a series of turns, corkscrews, and dips through the native forest canopy. The mountain coaster would offer the riders control over their speed and provide an experience that would be appropriate for a wide range of guests.¹ The mountain coaster would load/unload in the immediate vicinity of the proposed base lodge facility.

Construction of the coaster track would require installation of concrete pads at the base station, top station, and on the looping sections of the downhill track. The track foundation would be constructed on top of the ground and concrete pads. The track would be generally near ground level and

¹ An automatic braking system ensures that guests do not exceed the top speed designed for the track.

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incorporate natural terrain elements into the activity. Some vegetation removal would be required to create a corridor for the coaster's alignment. Additionally, ground disturbance would occur in areas where infrastructure is proposed to be installed.

ZIP COASTER

MMSA proposes to construct a zip coaster which would parallel the up-haul alignment of the proposed mountain coaster (refer to **Figure 3**). The zip coaster would descend on a 3,800-foot-long circuitous path at an approximately 9 percent average grade. The zip coaster would transport guests through the native forest canopy, working with the natural terrain and eventually arriving back at the loading/unloading platform adjacent to the proposed base lodge facility. Incidental tree removal may be required along the coaster alignment and ground disturbance would occur in areas where infrastructure is proposed to be installed.

ADVENTURE CHALLENGE ROPES COURSES

MMSA proposes to construct two adventure challenge ropes courses and one modular junior challenge ropes course uphill of the realigned snowtubing lanes (refer to **Figure 3**). The adventure courses would wind through the native tree canopy and include short sections of challenge elements and short zip lines. Guests would be led by a guide with an opportunity to include an interpretive component to the tour to educate guests on the local forest flora and fauna. The junior course would provide a similar experience for younger children not capable of participating in the larger adventure ropes courses. The overall goal of the ropes challenge course would be to provide a family-friendly, teambuilding, and multigenerational challenge experience.

Incidental tree removal may be required along the course and ground disturbance

would occur in areas where infrastructure is proposed to be installed.

RELOCATE SNOWMOBILE ADVENTURE TOURS

MMSA proposes to relocate the existing Snowmobile Adventure Tours operation, which is currently located at the Main Lodge, to the southwest corner of Woolly's Adventure Summit area in order to consolidate the expanded non-skiing activities (refer to **Figure 3**). Guests would access trails by way of the "C" Trail connector which accesses routes currently in use on the existing tours. The "C" Trail is currently groomed as a part of the existing Snowmobile Adventure Tours operation.

BASE LODGE FACILITY

MMSA proposes to construct an approximately 3,000-square foot base lodge facility in the Woolly's Adventure Summit Area (refer to **Figure 3**). The proposed facility would include permanent restrooms, ticket sales, food and beverage services and retail sales in order to support the existing and proposed activities in the area. Ground disturbance would be required to create a footprint for the proposed base lodge facility. Further, the base lodge facility would be landscaped using native plants and include a demonstration garden with native plants and pollinators.

Nature of Decision to be Made

The Responsible Official for this project is Tammy Randall-Parker, the Forest Supervisor of the Inyo National Forest. In order to make a decision, the Responsible Official will review the EA, Purpose and Need for Action, Proposed Action (and other potential alternatives), all public comments, and the administrative record.

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Alternatives Considered

No other alternatives are currently included in this analysis. At this time, the Inyo National Forest is not including additional action alternatives or the No Action Alternative in this analysis. Known resource issues within the project area have been addressed through the design/layout of the project, as well as Project Specific Design Criteria (PDC); significant impacts are not anticipated.

NO ACTION ALTERNATIVE

The No Action Alternative provides a baseline for comparing the effects of the action alternatives. The No Action Alternative essentially reflects a continuation of existing management practices without changes, additions, or upgrades. No new facilities or recreational opportunities would be approved under the No Action Alternative. In accordance with [Forest Service Handbook 1909.15, Chapter 40, Section 41.22](#) and [36 CFR § 220.7\(b\)\(2\)\(ii\)](#), the EA will not include an analysis of the No Action Alternative.

The Forest Service Handbook states:

A stand-alone no-action alternative is not required. However, the effect of taking no action should correlate closely with the purpose and need. In other words, the effects of not taking action should provide a compelling reason for taking action and, therefore, should be consistent with the purpose and need for action (FSH 1909.15).

Project Design Criteria

PDC would be implemented to avoid and minimize potential resource impacts from construction and implementation of the Proposed Action. This list supplements the list of Best Management Practices (BMPs) that MMSA would be required to prepare for Forest Service review prior to the start of construction and implementation.

Table 1 presents the PDC that will be required with implementation of the Proposed Action.

Table 1. Project Design Criteria

PROJECT PHASE	PROJECT DESIGN CRITERIA
<p>General</p>	<ol style="list-style-type: none"> 1) Prior to starting construction activities on NFS lands, MMSA shall develop a Construction Implementation Plan for Forest Service review and authorization. All proposed construction methodologies and practices will be reviewed for compliance with the decision and resource management direction. This plan shall include the following information: <ul style="list-style-type: none"> • Construction Management: Project timelines, project contracts, disturbance boundaries, grading and site plans, staging and parking areas, construction access, and any required survey information • Timber Management: Defined logging deck areas and skid paths, and protocol for timber removal • Erosion Control and Drainage Management • Post-Construction Revegetation and Restoration: Methodology, locations, vegetative mixes, and soil amendments • Noxious Weed Management: Weed control methodologies including equipment cleaning, pretreatment, and post-construction monitoring and treatment • BMPs: Resort BMP list to be employed and adhered to during project implementation 2) MMSA shall obtain all required county, town, and state permits prior to the start of construction.

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Table 1. Project Design Criteria (cont.)

PROJECT PHASE	PROJECT DESIGN CRITERIA
<p>Pre-Construction</p>	<ol style="list-style-type: none"> 1) Prior to any ground disturbing activities, project areas shall be surveyed for federally threatened, endangered, proposed and candidate plant and wildlife species, non-native plants and noxious weeds. Inyo National Forest plant and wildlife Species of Conservation Concern (SCC) will be surveyed in consultation with Inyo National Forest resource specialists. <i>(Note: Pre-construction surveys for other resources within the project area are not explicitly mentioned as surveys have either already been completed, or were not determined to be necessary based on the nature of the proposed projects.)</i> 2) PDC shall be modified in consultation with Inyo National Forest resource specialists in order to avoid impacts that could affect the persistence of at-risk (Endangered Species Act [ESA] and SCC) plant and animal species. 3) After spring runoff and prior to any construction activities that would occur related to this project, MMSA will conduct a comprehensive analysis of their current drainage management plan within the Dry Creek drainage. If drainage structures are determined not to be functioning to standard, these identified structures shall be maintained and/or improved as part of the initial construction phase of the project. 4) Prior to temporary disturbance of any waters of the U.S., including wetlands, MMSA shall coordinate with the U.S. Army Corps of Engineers to determine if proposed activities require the use of a Pre-Construction Notification. If the Pre-Construction Notification requires the preparation and approval of a mitigation plan, the plan shall be reviewed and approved by the Inyo National Forest prior to project implementation.
<p>During Construction</p>	<ol style="list-style-type: none"> 1) If undocumented historic and/or prehistoric properties are located during ground disturbing activities or planning activities associated with approved construction activities, a Forest Service archaeologist shall be contacted and all construction in the immediate vicinity shall cease in accordance with 36 CFR § 800.11. 2) The Forest Service shall be contacted if Inyo National Forest species of conservation concern (SCC) are discovered within the project area during implementation. 3) If white bark pine individuals are discovered in the alignment of the proposed snowmaking pipeline, the pipe segment would be realigned to avoid removal of individuals to the greatest extent possible. 4) A PVC liner or similar impermeable structure shall be installed in the trench where high groundwater is encountered adjacent to or in the vicinity of any wetland resources in order to prevent the proposed snowmaking project from dewatering wetlands.
<p>Post Construction</p>	<ol style="list-style-type: none"> 1) Implement vegetative soil stabilization (e.g., soil conditioning, application of seed, planting of seedlings or other vegetation, application of fertilizer) and non-vegetative soil stabilization (e.g., riprap, gabions, geotextiles) within fourteen days of ground disturbance activities. Disturbed areas that have been revegetated and restored will be monitored until satisfactory conditions exist. 2) MMSA shall fund through Cost Recovery post-construction noxious weed treatment for three consecutive years, or until satisfactory condition is present, subsequent to any construction activities within the project area.

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Preliminary Issues and Effects to Consider

The analysis within the EA will focus on impacts to NFS lands. The EA will address the effects of the Proposed Action on the following resources: Wildlife, Botany, Watershed, Soils, Recreation, Traffic and Parking, Social and Economic, Scenery, and Cultural. The preliminary analysis has determined that the Proposed Action would not impact the resources listed in the *Resources/Issues Dismissed from Detailed Analysis* discussion.

There will be no fieldwork and minimal discussion of these non-impacted resources.

The EA will be issue-driven and contain detail corresponding to resource impacts. *Issues* are defined as unresolved conflicts that arise as a result of the Proposed Action. Issues may be refined prior to and during the EA.

Table 2 presents preliminary direct and indirect consequences to the biological and human environment related to the Proposed Action.

Table 2. Summary of Preliminary Direct and Indirect Environmental Consequences

RESOURCE	ISSUES	PRELIMINARY FINDINGS
Wildlife	Ground disturbance associated with the implementation of snowmaking infrastructure and the expanded snowtubing facility may result in impacts to Sierra marten (<i>Martes Americana</i>).	Suitable habitat for the Sierra marten, an Inyo National Forest SCC, is known to occur along portions of the 14 miles of proposed snowmaking pipeline. In order to determine the potential effects of the Proposed Action on Sierra marten, a winter use survey will be conducted, culminating in a Sierra marten winter habitat use report. If necessary, site specific species design criteria would be implemented to minimize disturbance to the aforementioned species and/or any other species federally listed or Inyo National Forest SCC determined to be present in the project area.
Botany	Plant communities including federal candidate species and Inyo National Forest plant SCC may be altered as a result of the Proposed Action. In addition, the Proposed Action has the potential to introduce and spread non-native, noxious and invasive plants.	The federal candidate species, whitebark pine (<i>Pinus Albicaulis</i>), is known occur in portions of the project area near the proposed snowmaking line. Implementation of the snowmaking supply line is not anticipated to require tree clearing as it would be located on previously disturbed ski trails; however, it is possible that individual trees may be impacted by project activities. While the project has the potential to impact individuals, it is not anticipated to result in harmful effects on local populations, as site specific species design criteria would be implemented to avoid and minimize effects. Refer to Table 1 for a description of PDC. The project area also contains suitable habitat for Inyo National Forest plant SCC. A botany survey will be conducted during blooming periods to determine whether any SCC plant species exist in the project area. If any SCC plants are found to exist in the project area, site specific species design criteria would be implemented to minimize disturbance or impacts to those species. Refer to Table 1 for a description of PDC.

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Table 2. Summary of Preliminary Direct and Indirect Environmental Consequences (cont.)

RESOURCE	ISSUES	PRELIMINARY FINDINGS
Botany (cont.)		<p>In addition, non-native, noxious or invasive plant species such as cheat grass, mullen, bull thistle, and dandelion are known to exist in the project area. Forest Service BMPs and project-specific design criteria would be implemented to avoid the introduction and/or spread of non-native, noxious and invasive plants.</p>
Watershed	<p>Increased snowmaking coverage and groundwater usage associated with the proposed snowmaking project has the potential to impact springs and groundwater dependent ecosystems in the Dry Creek drainage.</p>	<p>MMSA’s existing snowmaking system uses approximately 230 acre-feet of water per year on average. The proposed snowmaking project is projected to require an additional approximately 100 acre-feet of water per year on average. This would result in a total of 330 acre-feet per year, a 43 percent annual increase in water consumption for snowmaking at MMSA.</p> <p>To provide the additional water for the proposed snowmaking project and ensure that adequate water volume is available to refill the snowmaking pond, MMSA proposes to drill two new wells in the vicinity of the existing Well 8 and the existing compressor building. The additional water withdrawals (from the same aquifer that water is drawn currently from for snowmaking) are not anticipated to negatively impact the aquifer volume, as the total proposed water usage is less than 3 percent of the natural annual aquifer replenishment rate of the Dry Creek drainage.</p> <p>Further, the California Ski Industry Association (CSIA) and the Forest Service generally consider snowmaking water use to be at least 80 percent non-consumptive, meaning that a high percentage of the water extracted from the aquifer will return back to the same aquifer during spring melt (CSIA 2018). Additional offset to the aquifer will occur via groundwater recharge from surface water delivered to the snowmaking ponds. Therefore, additional water withdrawals for snowmaking are not expected to negatively impact the aquifer volume, or associated spring and groundwater-dependent ecosystems in the Dry Creek drainage.</p> <p>Potential effects on springs and groundwater-dependent ecosystems in the Dry Creek drainage are anticipated to be negligible as snowmaking will generally occur during below-normal precipitation years and snow-cover and associated runoff would be more consistent with normal to above normal precipitation years that already occur.</p> <p>Water sufficiency and changes to aquifer recharge rates associated with the Proposed Action will be further analyzed using an updated version of previous groundwater models used for the Dry Creek drainage.</p> <p>Preliminary analysis suggests that there is sufficient water to meet the snowmaking needs, without causing significant impacts to water-dependent resources.</p>

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Table 2. Summary of Preliminary Direct and Indirect Environmental Consequences (cont.)

RESOURCE	ISSUES	PRELIMINARY FINDINGS
<p>Soils</p>	<p>Ground disturbance associated with the implementation of snowmaking infrastructure and the expanded snowtubing facility may result in impacts to soil resources.</p>	<p>The implementation of the snowmaking infrastructure, expanded parking, and the snowtubing area would require extensive grading on previously disturbed soils. Impacts to soil resources would be minimized using BMPs and site specific PDC (refer to Table 1).</p> <p>Specifically, these measures include the implementation of vegetative soil stabilization (e.g., soil conditioning, application of seed, planting of seedlings or other vegetation, application of fertilizer) and non-vegetative soil stabilization (e.g., riprap, gabions, geotextiles) within fourteen days of ground disturbance activities. Disturbed areas that have been revegetated and restored will be monitored until satisfactory conditions exist.</p> <p>Additionally, MMSA will fund post-construction noxious weed treatment for three consecutive years, or until satisfactory condition is present, subsequent to any construction activities within the project area.</p>
<p>Recreation</p>	<p>The Proposed Action would alter the recreation opportunities available to the public at MMSA.</p>	<p>The Proposed Action is anticipated to expand and enhance the existing recreational opportunities offered at MMSA. The proposed snowmaking expansion project would enhance the reliability and consistency of the skiing surface. Additionally, the upgraded snowtubing lanes and snow play area at Woolly’s Adventure Summit would provide improved operational efficiency. Overall, the addition of summer programming at Woolly’s Adventure Summit would enable a wider spectrum of guests to engage in nature-based experiences, as well as encourage new users to visit and experience the National Forest in a safe and managed context.</p> <p>As all components of the Proposed Action are contained within the MMSA SUP boundary, the displacement of existing recreational opportunities on the Inyo National Forest is not anticipated. Further, all components of the Proposed Action are consistent with the Forest Plan, as the MMSA SUP boundary exists within the <i>Destination Recreation Management Area</i>, which directs that lands be managed to satisfy a variety of seasonal recreational demands.</p> <p>As a result of these factors, it is anticipated that the Proposed Action would result in a benefit to the recreation resource and promote the continuation of high-quality recreation opportunities on the Inyo National Forest.</p>

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Table 2. Summary of Preliminary Direct and Indirect Environmental Consequences (cont.)

RESOURCE	ISSUES	PRELIMINARY FINDINGS
<p>Traffic and Parking</p>	<p>Implementation of the proposed parking lot expansion is anticipated to impact traffic and parking within and adjacent to the SUP area</p>	<p>The proposed parking lot expansion project would extend on-site parking to the east and west of the existing parking lot at Woolly’s Adventure Summit (refer to Figure 3). The parking expansion would create 72 additional parking spaces for a total of 179 parking spaces. Twenty-four of the proposed parking spaces would be located in front of the Snowmobile Adventure Tours area and circulate drivers to the west to exit via FS Road 03S27. As it is currently difficult to turn onto State Highway 203 via FS Road 03S27, it is anticipated that the increased vehicular passage through the area could cause circulation issues; however, the addition of parking spaces for the Snowmobile Adventure Tours would also provide space for users who currently park on the side of State Highway 203. In order to minimize and avoid circulation issues, MMSA would work with Caltrans to increase signage in the area. In addition, during the winter MMSA would reduce the height of snowbanks along State Highway 203 to the greatest extent feasible in order to improve driver visibility.</p> <p>Further, the construction of the driveway, transit stop, and associated routes would enable more efficient use of mass transit at MMSA. While skiers may choose to park in this lot, the parking expansion is intended to serve users of the Woolly’s Adventure Summit, including users of Snowmobile Adventure Tours.</p> <p>Collectively, the proposed parking expansion project is anticipated to benefit traffic and parking in the MMSA SUP area. While the western parking lot expansion would increase the use of the FS Road 03S27 intersection due to the addition of 24 parking spaces, the improved signage and lowered snowbanks would help facilitate safe passage through the area. The addition of parking spaces for the Snowmobile Adventure Tours would also provide space for users who currently park on the side of State Highway 203.</p>
<p>Social and Economic</p>	<p>Implementation of the proposed projects may result in the creation of a few full-time and temporary jobs, providing economic opportunities for select members of the local community.</p>	<p>The Proposed Action may create a few full-time equivalent positions in its expansion of snowmaking operations and additional offerings during the summer season; however, the positions would probably not draw new employees, but rather convert seasonal employees to full time employees. Therefore, the additional operational positions are not anticipated impact social and economic resources within the Mono County community (county services, school systems, etc.). The project would have short-term economic impacts due to construction related activities; however, construction jobs would likely be temporary, providing economic opportunities for select members of the local community.</p>

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Table 2. Summary of Preliminary Direct and Indirect Environmental Consequences (cont.)

RESOURCE	ISSUES	PRELIMINARY FINDINGS
Scenery	Implementation of the proposed projects could alter the scenic resources within the SUP area and from adjacent views.	Infrastructure included in the Proposed Action would be located in previously disturbed areas currently used for winter recreation activities. Projects including the zip coaster, mountain coaster, adventure challenge ropes course, and snow play area are designed to integrate into the surrounding forested environment and are not expected to result in noticeable changes to viewsheds in and adjacent to the SUP area. Projects components such as the base lodge facility, and the parking lot are more likely to result in impacts to scenery resources and must adhere to Built Environment Image Guide guidelines in order to avoid or minimize effects.
Cultural	Implementation of the Proposed Action within the SUP area could disturb previously unidentified historic properties.	Previous archaeological field inventories and site records for the project area are on file at the Inyo National Forest and the California Historical Resources Information System. Inyo National Forest files indicate that more than thirty National Heritage Preservation Act Section 106 consultations and/or field surveys have been conducted within the MMSA SUP boundary between 1979 and present. Previous archaeological field inventories will be assessed in order to determine the extent of their coverage and reliability with respect to the undertaking in accordance with current survey standards, extant field conditions and known historical information. Following this pre-field research, a field inventory strategy shall be developed that has an objective of identifying all reasonably detectable historic properties that may exist in the area of potential effect so that appropriate avoidance, protection and/or mitigation strategies can be identified for the project.

RESOURCES/ISSUES DISMISSED FROM DETAILED ANALYSIS

Considering the project area and the Proposed Action, the following resources are anticipated to be dismissed from detailed analysis. Additional details will be provided in the EA.

Noise

The Proposed Action would introduce noise both during the construction phase (e.g., noise from construction equipment) as well as during the operation phase (e.g., operation of snowmaking infrastructure, mountain coaster, zip coaster, etc.). These conditions would be similar to existing conditions surrounding the project areas within the MMSA SUP area.

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Inventoried Roadless Area

The Proposed Action is not located within an Inventoried Roadless Area; however, the Mammoth Lakes Community Center Forest Trail is an Inventoried Roadless Area located in proximity to the MMSA SUP area. As none of the project elements are located within the Inventoried Roadless Area, the Proposed Action is not anticipated to negatively impact this resource.

Air Quality

The Proposed Action would generate negligible emissions through short-term construction related emissions. In the long term, air quality degradation and climate change emissions due to the Proposed Action would be small. The Proposed Action is not anticipated to result in measurable changes to visitation to the greater project area; therefore, the proposed projects would not result in increased emissions from guest travel.

California has 29 Class I areas; the closest to the project area is the Ansel Adams Wilderness located approximately 1 mile from MMSA. Other Class I areas within 100 miles of the project area include the Mokelumne Wilderness, Emigrant Wilderness, Hoover Wilderness, John Muir Wilderness, Kaiser Wilderness, Yosemite National Park, Kings Canyon National Park, and Sequoia National Park. The area surrounding the resort is in attainment or unclassifiable for all criteria pollutants under the Clean Air Act. As an exposed feature located at high elevation where winds can be strong, air emissions at the ski area are generally readily dispersed. Furthermore, the majority of emissions associated with the ski area occur during daytime hours when down-valley drainage is least common. Due to its location, topography, hours of heaviest operation, and common meteorological conditions, emissions from MMSA are unlikely to contribute to air quality problems in nearby Class I areas. In addition, the

implementation of PDC would further reduce any potential impacts to negligible levels.

Environmental Justice

The Proposed Action would not disproportionately affect low income or minority populations because those portions of populations would still have access to all public lands and dispersed recreation opportunities.

Wild and Scenic Rivers

There are no Wild and Scenic Rivers within the project area; however, Mammoth Creek is eligible Wild and Scenic River designation and is located adjacent to the project area. The Proposed Action is not anticipated to impact Mammoth Creek's eligibility as a Wild and Scenic River because the closest project elements would be buried snowmaking pipes located in an area that is characterized by infrastructure purposed for winter recreation.

Wilderness/Wilderness Study Areas

There are no Wilderness Areas or Wilderness Study Areas within the project area.

Floodplains

The Proposed Action is not within a designated floodplain. The Proposed Action does not include structural siting or development within a floodplain. Floodplains, as defined in Executive Order 11988, would not be affected by the Proposed Action. As assessment of wetlands and consistency with Executive Order 11990 would be performed in conjunction with the watershed analysis.

Areas of Critical Environmental Concern

There are no Areas of Critical Environmental Concern within the project area.

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Comment Process

The proposed projects are activities implementing a land management plan and resource management plan and are subject to the objection process described in [36 CFR Part 218 Subparts A and B](#). The Forest Service is combining the scoping period and opportunity to comment period. The public is encouraged to provide specific written comments on this proposal, including supporting reasons for the responsible official to consider, as no additional “opportunity to comment” periods will occur. Specific written comments must be within the scope of and have a direct relationship to the Proposed Action.

Written comments (regarding Forest Service questions and concerns) must be submitted by:

Mail:

Tammy Randall-Parker, Forest Supervisor
c/o Janelle Walker, Project Leader
Mammoth Ranger District
P.O Box 148
Mammoth Lakes, CA 93546

At the Mammoth Ranger Station:

Janelle Walker, Project Leader
351 Pacu Lane, Suite 200
Bishop, CA 93514
(Monday through Friday, 8:00 a.m. to
4:30 p.m., excluding holidays)

Electronic:

[Online comment form](#)

Note: the name and mailing address of the person submitting electronic comments must be included.

It is the responsibility of persons providing comments to submit them by the close of the comment period, which will be 30 days after the legal notice is published in the newspaper of record, the *Inyo Register*. Only those who submit timely and specific written comments will have eligibility to file an objection under [36 CFR § 218.8](#). For objection eligibility, each individual or representative from each entity submitting timely and specific written comments must either sign the comment or verify identity upon request. Individuals and organizations wishing to be eligible to object must meet the information requirements in [36 CFR § 218.25\(a\)\(3\)](#). Names and contact information submitted with comments will become part of the public record and may be released under the Freedom of Information Act.

If the Forest Service determines there are no significant impacts, that finding, along with the EA and a draft decision notice, will be published for a 45-day objection. If no specific written comments are received during the designated opportunity for comment, the project will not be subject to objection. If the EA concludes there is potential for significant impacts, then an EIS will need to be prepared. Additional information regarding this action and the comment process can be obtained from project leader Janelle Walker at janelle.walker@usda.gov or by phone at (760) 924-5523.

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List of References

IN-TEXT CITATION	FULL REFERENCE
CSIA 2018	California Ski Industry Association. 2018. Snowmaking Facts. Petaluma, CA.
USDA Forest Service 2010	USDA Forest Service. 2010. Forest Service Handbook 1909.15, Chapter 40, Section 41.22. Available online: https://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?1909.15
USDA Forest Service 2011	USDA Forest Service. 2011. Ski Area Recreational Opportunity Enhancement Act. Available online: congress.gov/112/plaws/publ46/PLAW-112publ46.pdf
USDA Forest Service 2019	USDA Forest Service. 2019. Inyo National Forest Land and Resource Management Plan. Available online: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd664404.pdf

List of Hyperlinks Provided in this NOPA

EMBEDDED LINKS	URL
Inyo National Forest Land and Resource Management Plan	https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd664404.pdf
project website	https://www.fs.usda.gov/project/?project=54453
Online comment form	https://cara.ecosystem-management.org/Public/CommentInput?Project=54453
Forest Service Handbook 1909.15, Chapter 40, Section 41.22	https://www.fs.fed.us/cgi-bin/Directives/get_dirs/fsh?1909.15
36 CFR § 220.7(b)(2)(ii)	https://www.gpo.gov/fdsys/pkg/CFR-2011-title36-vol2/pdf/CFR-2011-title36-vol2-sec220-7.pdf
36 CFR Part 218 Subparts A and B	https://www.gpo.gov/fdsys/granule/CFR-2013-title36-vol2/CFR-2013-title36-vol2-part218
36 CFR § 218.8	https://www.gpo.gov/fdsys/search/pagedetails.action?collectionCode=CFR&browsePath=Title+36%2FChapter+11%2FPart+218%2FSection+218.8&granuleId=CFR-2006-title36-vol2-sec218-8&packageId=CFR-2006-title36-vol2&collapse=true&fromBrowse=true
36 CFR § 218.25(a)(3)	https://www.gpo.gov/fdsys/granule/CFR-2013-title36-vol2/CFR-2013-title36-vol2-sec218-25
36 CFR § 800.11	https://www.govinfo.gov/content/pkg/CFR-2010-title36-vol3/pdf/CFR-2010-title36-vol3-sec800-11.pdf

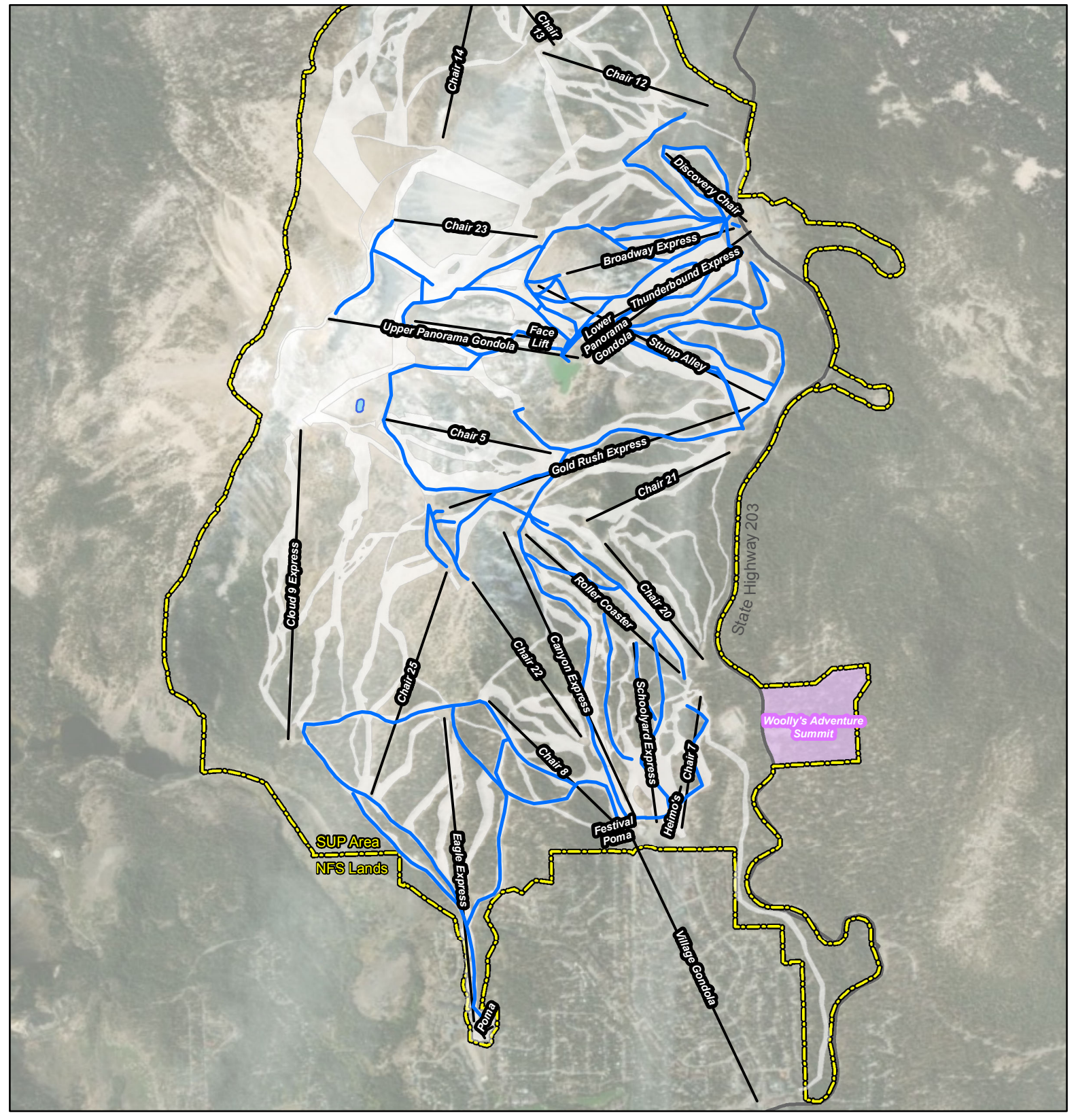
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Figures

Figure 1. Existing Conditions

Figure 2. Proposed Snowmaking

Figure 3. Proposed Projects at Woolly's Adventure Summit









Inyo National Forest
Mammoth Ranger District

**Mammoth Mountain Ski Area
Snowmaking and Woolly's Adventure Summit
Environmental Assessment**

Figure 1: Existing Conditions

Existing

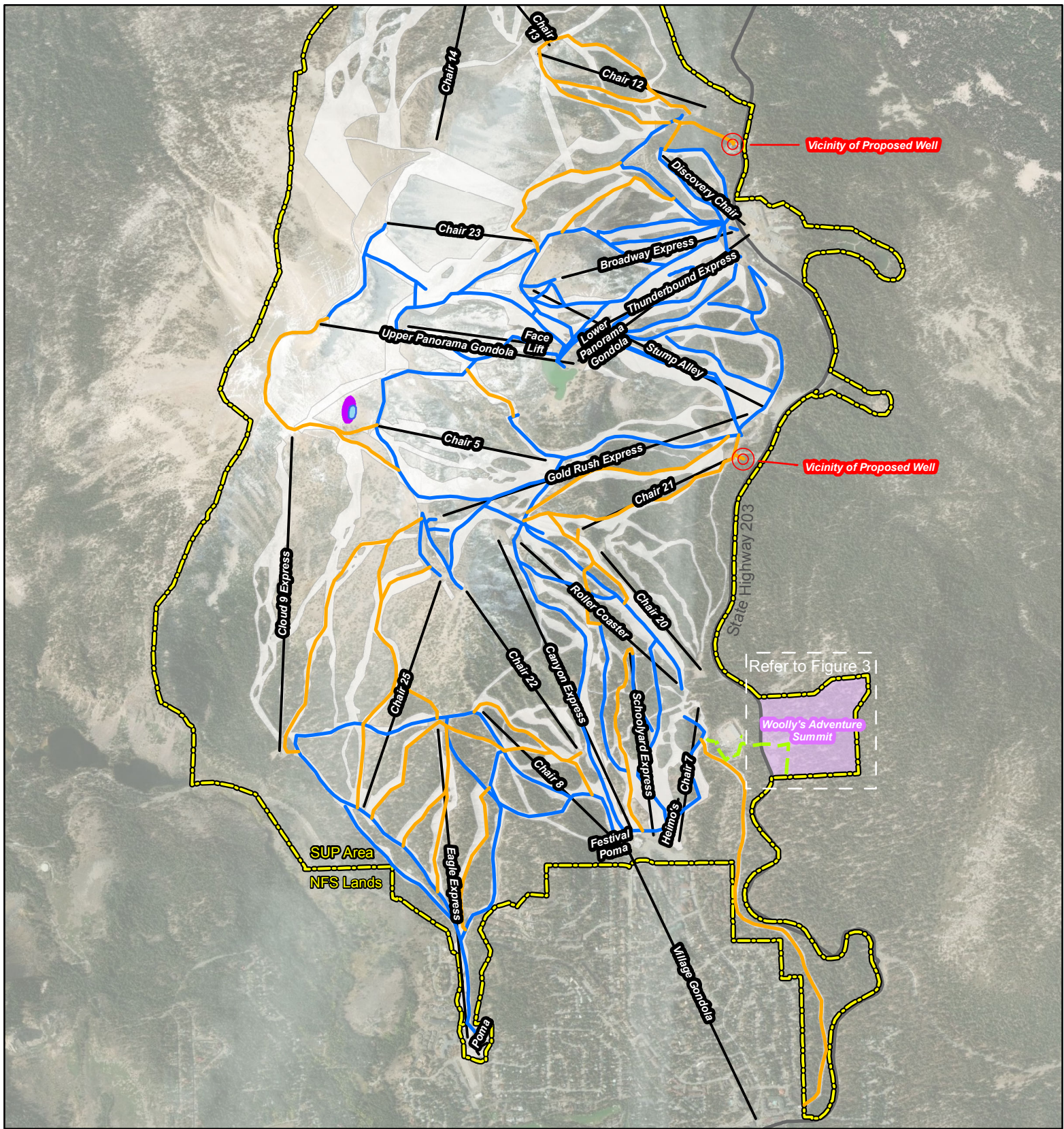
-  Snowmaking Pipe
-  Lifts
-  Ski Trails
-  Snowmaking Pond
-  Woolly's Adventure Summit
-  SUP Area

0 1,000 2,000'



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Mammoth Ranger District

**Mammoth Mountain Ski Area
Snowmaking and Woolly's Adventure Summit
Environmental Assessment**

Figure 2: Proposed Snowmaking Projects

Existing

- Snowmaking Pipe
- Lifts
- Snowmaking Pond
- Ski Trails
- Woolly's Adventure Summit
- SUP Area

Proposed

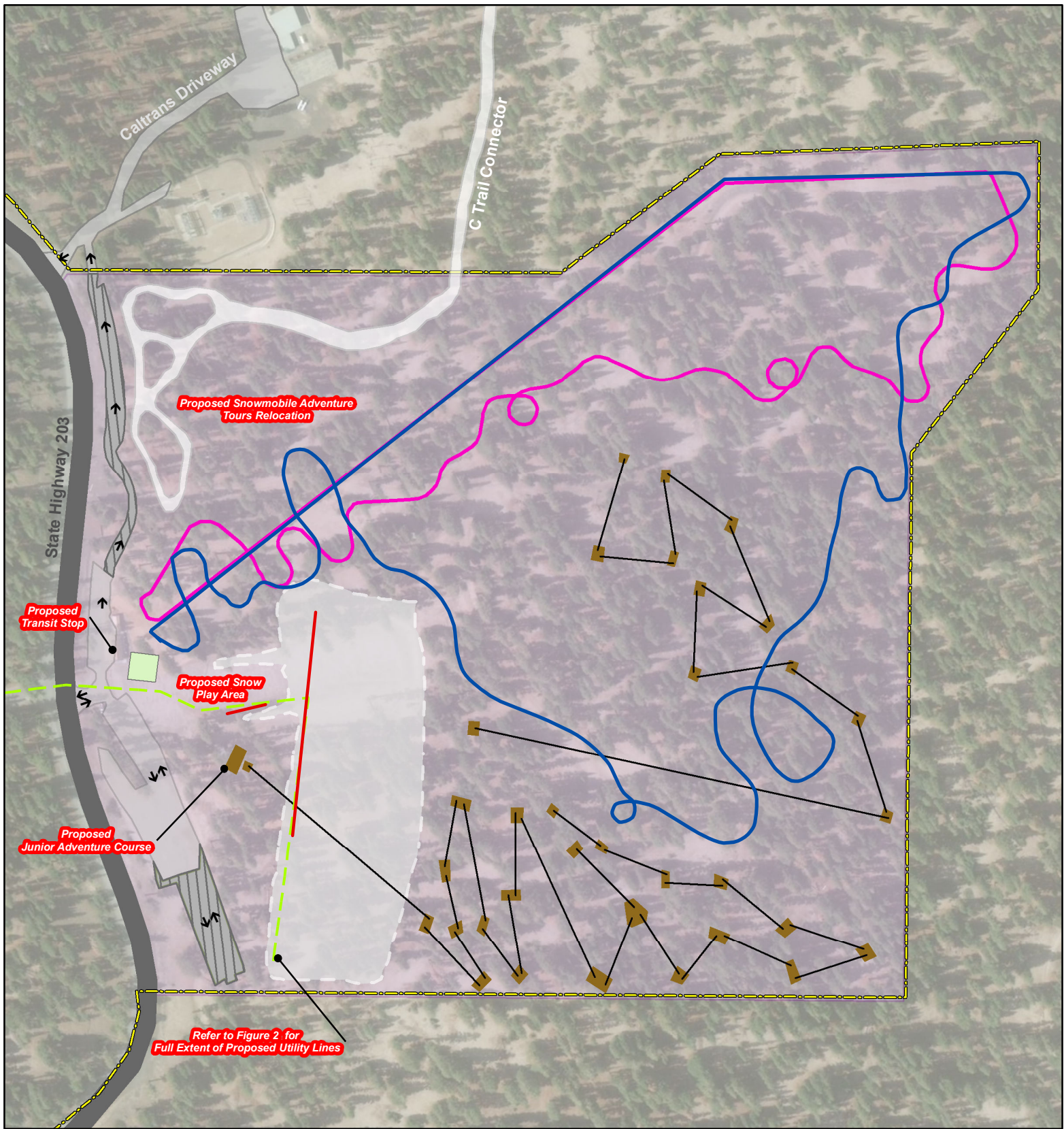
- Snowmaking Pipe
- Snowmaking Pond Enlargement
- Utility Lines
- Vicinity of Proposed Well

0 1,000 2,000'



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**Mammoth Mountain Ski Area
Snowmaking and Woolly's Adventure Summit
Environmental Assessment**

**Figure 3: Proposed Projects
at Woolly's Adventure Summit**

Existing

- Parking Lot
- SUP Area
- Woolly's Adventure Summit
- C Trail Connector (Over Snow Access Route)

Proposed

- Magic Carpet
- Mountain Coaster
- Zip Coaster
- Adventure Course
- Snowtubing Lanes
- Parking Lot Expansion
- Base Lodge
- Utility Lines

0 100 200'



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