

4.0 ENVIRONMENTAL IMPACT ANALYSIS

K. RECREATIONAL RESOURCES

INTRODUCTION

The purpose of this section is to provide an analysis of the Project's effect on the Project Area's existing recreational resources and whether the Project's proposed recreational components would result in secondary physical impacts. In addition, this section analyzes the Project's consistency with the policies and regulations set forth in local and regional plans that are applicable to recreational resources. In the Town and respective planning area, applicable, adopted plans include the Town of Mammoth Lakes General Plan and the Inyo National Forest Land Resources and Management Plan (LRMP). The provisions set forth in these plans have been adopted for the purpose of administering recreational resources.

1. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) Town of Mammoth Lakes General Plan

The Town of Mammoth Lakes General Plan is made of a range of elements, or subject areas, that are integral to the unique identity of Mammoth Lakes. The *Parks, Open Space and Recreation* element of the General Plan applies to the recreational opportunities provided under the TSMP. Within the *Parks, Open Space, and Recreation* element are the *Trail System, Recreational Opportunities, and Connected Throughout* components. The goals of the *Trail System* component are addressed in Chapter 4.I, *Land Use and Planning*, of this EIR. The other recreational policies of the General Plan, including *Recreational Opportunities* and *Connected Throughout*, are described and addressed in this section. Applicable goals and policies of the General Plan to the Project are listed below.

Recreational Opportunities

P.4. GOAL: Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.

P.4.A. Policy: Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.

P.4.B. Policy: Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors. Activities include but are not limited to:

- Downhill skiing & snowboarding
- Day & backcountry hiking
- Cross-country skiing
- Walking
- Fishing
- Sleigh rides
- Fall-color viewing
- Tennis

- Back-country skiing & snowboarding
- Interpretive trails & signage
- Snowshoeing
- Climbing
- Sledding
- Touring
- Dog sledding
- Street & mountain biking
- Ice skating
- Camping
- Snowmobiling
- Birding
- Swimming
- Health & fitness
- Soccer
- Off-highway vehicles
- Racquetball
- Equestrian activities
- Snow play
- BMX
- Skateboarding

P.4.C. Policy: Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.

P.4.C.1. Action: Specifically address use, needs and operations of motorized and non-motorized recreation users in a year round comprehensive recreation plan.

Connected Throughout

P.5. GOAL: Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes.

P.5.A. Policy: Create open space corridors by combining open space on neighboring properties.

P.5.B. Policy: Design and construct trails as components of a regional and local network for recreation and commuting.

P.5.C. Policy: Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.

P.5.C.1. Action: Prepare an expanded Master Plan to link trails, parks and open space.

(2) Inyo National Forest Land and Resource Management Plan

The LRMP prescribes management direction for the multiple use and sustained yield of public benefits for the Inyo National Forest. According to the LRMP, recreation is the most significant resource on the Inyo National Forest, and the Forest is expected to continue in providing recreational opportunities for the foreseeable future. The LRMP states that the economic stability of all Eastern Sierra communities rests heavily on recreation-based income and that most of the major attractions that bring recreationists to the area are located on Inyo National Forest land.

According to the LRMP, on lands with potential for both recreation and other resources, current practice usually emphasizes recreational values. The LRMP further states that an opportunity exists in which it can be decided which areas will be managed for varying recreational opportunities, how those opportunities will be enhanced, and what types of resource management are consistent with a recreation emphasis. According to the LRMP, the demand for recreation in the Mammoth area is heavily tied to the population of Southern

California. The LRMP expects demand to exceed the existing capacity of many USFS recreational facilities and that the current emphasis on destination-oriented camping in the Forest will continue. LRMP recreational policies are as follows:

- Construct and maintain facilities and sites to regional standards.
- Construct and maintain sites and associated water systems and wastewater treatment plants to Facility Condition Class 1 as defined in the recreation resource inventory.
- Emphasize permitted activities rather than prohibited ones on signs to lessen recreation use conflicts.
- Provide screening and shade, using vegetation and/or artificial structures, to increase use on less attractive sites.
- Develop new campsites in concentrated recreation areas before other locations to generate increased use and higher return to the U.S. Treasury.
- Develop associated day-use facilities and interpretive and informational sites and trails, together with overnight campgrounds, to achieve a balanced facility package.

The Project Area includes Management Area No.8, the Mammoth Escarpment, and Management Area No. 9, Mammoth. Management Area No. 8 incorporates Mammoth Lakes Basin and Management Area No.9 contains private land within the Town of Mammoth Lakes and USFS land adjacent to the Town, to the east of Lake Mary Road. The LRMP sets forth policies for the management of recreational resources in the designated Management Areas. Recreational resources prescriptions/policies that are applicable to Management Area No.8, a designated Concentrated Recreation Area, include the following:

- Develop recreation campsite plans to inventory, coordinate and program the full summer and winter recreation development potential in the area in Prescription No.12 (Lakes Basin).
- Identify and program dispersed trail facilities in the areas in the Lakes Basin.
- Include hiking and equestrian trail opportunities in all areas and bicycle trails in the Lakes Basin. Include opportunities for mountain bike trails within the Management Area.
- Interface trail systems with the community.
- Maintain levels of reservoirs in Mammoth Lakes Basin to desirable levels for recreation use and scenic enhancement during the entire summer use season.
- Emphasize day-use activities within the Mammoth Lakes Basin by developing needed day-use facilities to complement overnight campgrounds.
- Limit resort capacity in the Mammoth Lakes Basin to 10 percent above 1985 levels. Emphasize development of front county trails, particularly those linking Mammoth to the Forest.
- Maintain current use patterns and open space on National Forest Service System lands adjacent to Valentine Reserve.

Recreational policies related to Management Area No.9 include the following:

- Provide trail interface opportunities with the community of Mammoth Lakes.

- Maintain open space access adjacent to the Town of Mammoth Lakes for passive recreation use.
- Prohibit dispersed camping throughout the Management Area.
- Prohibit development of Shady Rest beyond existing perimeter roads and north of the power line right-of-way.
- Allow development of Mammoth Creek Park by the Town of Mammoth Lakes.
- Identify and program the expansion potential of the Shady Rest and Sherwin Creek Campground complexes and develop as funds become available.
- Fully develop the interpretive potential of Hot Creek geologic site as funds become available.

b. Existing Conditions

The Town of Mammoth Lakes is currently developing a “Parks and Recreation Master Plan” in addition to the TSMP, as directed under the Town’s General Plan. The intention of the Town with these plans is to enhance and expand public access to trails and enhance other recreational facilities to accommodate existing public need. Existing parks operated by the Town and/or located in the vicinity of the Project Area are listed below:

- Mammoth Creek Park (East and West) – This 5-acre park is located off Old Mammoth Road near Meridian Boulevard and includes the Hayden Cabin museum, picnic tables, restroom facilities, children's play area, art sculpture, walking and biking trails, and paved parking. In addition, the park has trailheads for paved MUPs that connect to the Town’s Main Path. Mammoth Park East is located on National Forest land and is operated by the Town under a USFS Special Use Permit.
- Shady Rest Park – This 12.5-acre park is located on Sawmill Cutoff Road to the north of SR-203 and is the main active sports municipal park in the Town. It includes a soccer field, softball fields, restrooms, BMX park, two sand volleyball courts, picnic areas, a play area, and paved parking. This park is located on National Forest land and is operated by the Town under a USFS Special Use Permit.
- Community Center Park – This 4.5-acre park is located at 1000 Forest Trail and includes the Community Center, library, children's play area, six tennis courts, picnic tables, walking paths, restrooms, and paved parking. The Community Center includes a kitchen, stages, and other facilities and is primarily used for public meetings including Town Council meetings.
- Whitmore Park - This 18.66-acre park is located along US-395 at Benton Crossing and contains three baseball/softball diamonds, restrooms, picnic facilities community swimming pool, and paved parking. The park is operated jointly by the Town and Mono County on land leased from the Los Angeles Department of Water and Power. An all-weather track facility has been proposed for this park and is currently undergoing project and environmental review.
- Trails End Park - This 2-acre park is located along Meridian Boulevard south of Commerce Drive and includes Brothers Skate Park, and restroom facilities. Expansion of this park to include a playground area is expected in the next one to two years.

The USFS operates numerous campgrounds within the vicinity of the Town including the following:

- Sherwin Creek Campground - This facility is located just to the south of the Town, via Sherwin Creek Road, near the confluence of Sherwin and Mammoth Creeks. The campground offers 87 campsites, a convenience store, fishing supplies and opportunity for fly fishing in Sherwin and Mammoth Creeks.
- Lake Mary Campground - This 48 campsite facility is located near and along the shore of Lake Mary. Lake Mary has no boat ramps, but carry-down access for non-motor and motor boats is available.
- Coldwater Campground, - This 77 campsite facility is located to the south of Lake Mary along upper Mammoth Creek and is within walking distance to Lake Mary.
- Pine City Campground - This 10-campsite facility is located on the southeast shore of Lake Mary.
- Twin Lakes Campground - This 92-campsite facility is located on the shores of Twin Lakes, and offers rustic cabins, a lodge, a store, and rental canoes and rowboats.
- Shady Rest Campgrounds - The Old Shady Rest and New Shady Rest campgrounds are located north of Highway 203 at the east entry to town. The campgrounds together offer 130 campsites.

In addition to these facilities, the Town includes a network of bike paths and trails, as described in Chapter 2, *Project Description*, of this EIR.

The Sherwins Area is located on National Forest lands within the Town's Planning Area, but outside the Municipal Boundary. It consists of a diverse high-desert landscape that contains such features as Mammoth Rock, the Sherwin Range, Hidden Lake, Panorama Dome, Solitude Canyon, and Mammoth Meadows as well as forests, wetlands, bodies of water, and wildlife. While recreation use in the Sherwins area has traditionally been high, no formal trailheads or facilities (benches, restrooms, parking, trash receptacles) exist at this time and the area receives no maintenance. The area has a mix of trails, some of which are part of the Inyo National Forest trail system, others that have been user created, and some that are remnants of historical use. Facilities in this area include USFS recognized trails (such as the Mammoth Rock Trail), USFS and Town roads (such as 4S100 and Sherwin Creek Road), a portion of the legacy Blue Diamond Trail System, and unofficial social trails.

2. ENVIRONMENTAL IMPACTS

a. Significance Thresholds

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form used during preparation of the project Initial Study, which is contained in Appendix A of this EIR. The Initial Study Environmental Checklist includes questions relating to recreation. The Initial Study Environmental Checklist questions relating to recreation have been utilized as the thresholds of significance in this section. An additional threshold has been added to address the Project's consistency with adopted plans, policies, and regulations to determine whether the Project could impede the recreational goals of such plans and policies in a manner that could result in a significant physical impact. Accordingly, a project may create a significant environmental impact if it causes one or more of the following to occur:

Threshold 1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (refer to Impact Statement 4.K-1);

Threshold 2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (refer to Impact Statement 4.K-1); and

Threshold 3: Inconsistent with adopted plans, policies, and regulations in a way that would impede the recreational goals of such plans and policies in a manner and result in a significant physical impact (refer to Impact Statement 4.K-2).

b. Methodology

The analysis of impacts to recreational resources considers the effects of the Project on existing parks and recreational facilities with respect to potential increases in demand and use of existing facilities. In addition, the analysis discusses whether the Project could result in any secondary physical impacts on the environment, particularly with respect to National Forest lands. The analysis also addresses the consistency of the project with adopted plans and policies that regulate these resources. Any inconsistencies with the policies of adopted plans are identified, and inconsistencies that would result in significant physical impacts are considered significant impacts. Applicable policies are those considered directly relevant to the components of the TSMP and SHARP. Because of the recreational character of the Project, Chapter 4.I, *Land Use and Planning*, of this EIR addresses applicable plans and regulatory measures specifically related to trails. Recreational policies, such as the *Recreational Opportunities* and *Connected Throughout* components of the *Parks, Open Space, and Recreation* element of the General Plan were not previously addressed in the Chapter 4.I. The policies of the Town of Mammoth Lakes Draft Parks and Recreation Master Plan (PRMP) is not evaluated in this chapter, since PRMP policies applicable to the TSMP are identical to those set forth in the General Plan.

c. Project Components

As discussed in detail in Section 2.0, *Project Description*, of this EIR, the Project would expand upon the existing trails system within the Town and adjacent National Forest lands by providing additional MUPs, Class I and II bike lanes, soft-surface trails, and improvements to recreational nodes. These components are considered as recreational resources to be provided by the Project. Please refer to Section 5, *Description of the Proposed Project*, in Section 2.0, *Project Description*, for a detailed discussion of the Project's proposed components that would provide new recreational resources within the Town and adjacent National Forest lands.

d. Analysis of Project Impacts

The analysis of Project impacts regarding recreational resources below applies to all future trail components associated with the Project, including the Priority Projects, unless stated otherwise.

(1) Effect of the Project on Existing Recreational Resources

4.K-1 The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or cause the need to construct new or expanded alternative recreational facilities, the construction of which would result in adverse secondary physical effects. Thus, less than significant impacts to recreational facilities would occur with Project implementation.

Proposed MUPs, bike paths, crossing improvements and other improvements under the Project within the Town's UGB would primarily be located along existing roadways and, therefore, would not result in substantial direct impacts to existing parks and recreational resources. Project-related improvements to recreational nodes and park facilities would be provided primarily within existing developed recreational areas and would improve the use, or expand the capacity, of such areas. To this extent, the Project would contribute to the Town's existing recreational resources. The recreational character of the Project would be consistent with the character of the community, which is based largely on the recreation industry, and consistent with the types of uses encouraged on National Forest lands. Because the Project would add recreational uses, it would increase the supply of recreational resources within the Town. The increase in recreational opportunities in the Town represented by the Project would lighten rather than increase demand for existing facilities in the Town. In addition, by adding new recreational opportunities within the Town and adjacent National Forest lands, the Project would ease the concern of the LRMP that demand would exceed the capacity of USFS facilities in the future. Therefore, the impact of the Project on the condition and capacities of existing recreational facilities would be less than significant.

The trails and trailheads proposed under the Project would improve access to National Forest lands surrounding the Town, particularly in the Sherwins Area. In addition, increased access to existing parks and recreational areas in the Lakes Basin would occur. The proposed trails, however, would generally not provide access to areas that are not currently accessible via existing roadways or informal trails. In the Sherwins Area, while some new trails would be developed, many of the SHARP projects would replace existing informal trails with appropriately designed trails and related improvements such as interpretive and wayfinding signage, restrooms at trailheads, and improved parking. These facilities would improve the safety and use of the area, as well as improve trail conditions and user experience. Generally, formal trails proposed under the SHARP would consolidate existing informal paths; incorporate erosion control; discourage use of informal, unmanaged trails; avoid wetlands; and, through informational signage, discourage the use of more sensitive habitat areas. Because the SHARP would reduce the existing web of informal, unmanaged trails in the Sherwins Area and provide signage, restrooms, and parking in an area already accessible through the existing informal trails, it would enhance recreational resources in this area. Overall, because the SHARP would not result in the substantial detrimental physical change in, or exceed the capacity of, existing recreational resources, the SHARP would have a less than significant impact relative to recreational resources.

Other direct and indirect environmental effects of the Project relative to the viability of National Forest lands as a recreational resource (in the Project Area) include impacts on the area's biological and cultural resources, and impacts relative to aesthetics, soils, geology, hydrology/water quality, noise, air quality, and fire hazards. These are addressed in the respective sections of this EIR (see Sections 4.A, *Aesthetics and Visual Resources*; 4.B, *Air Quality*; 4.C, *Biological Resources*; 4.D, *Cultural Resources*; 4.E, *Geology and Soils*; 4.G, *Wildland Fires and Fire Protection Services*; 4.H, *Hydrology and Water Quality*, and 4.J, *Noise*, of this Draft EIR). As described in these sections, respective environmental impacts in these subject areas would be reduced to less than significant levels through the implementation of mitigation measures. Therefore, direct and indirect impacts on the National Forest lands as a recreational resource would be less than significant.

(2) Consistency of the Project with Applicable Plans and Policies

4.K-2 The Project would be consistent with the recreational policies of applicable adopted plans, including the Town of Mammoth Lakes General Plan and the Inyo National Forest Land Resources and Management Plan. Recreational impacts with respect to adopted plans would be less than significant.

(a) Town of Mammoth Lakes General Plan

The purpose of the TSMP is to update the 1991 Trail System Plan, in accordance with the policies of Town of Mammoth Lakes General Plan. As previously described, the General Plan includes policies that are specific to the development of trails and similar facilities. The Project is compared to the policies of the General Plan in **Table 4.K-1, Consistency of the Project with Applicable Policies of the General Plan**, below. As discussed in the comparison of the Project to applicable recreation policies of the General Plan, the Project would be consistent with the Recreational Opportunities and Connected Throughout policies of the General Plan. Therefore, recreational resources impacts with respect to this plan would be less than significant. Also refer to Section 4.I, Land Use, of this EIR for a more thorough evaluation of the Project's consistency with the General Plan.

(b) Inyo National Forest Land and Resource Management Plan

Recreational policies of the LRMP that would be applicable to the Project include: (1) Construct and maintain facilities and sites to regional standards; (2) Identify and program dispersed trail facilities in the areas in the Lakes Basin; (3) Include hiking and equestrian trail opportunities in all areas and bicycle trails in the Lakes Basin; (4) Interface trail systems with the community and (5) Provide trail interface opportunities with the community of Mammoth Lakes. The Project is compared to each of these policies in Chapter 4.I, *Land Use and Planning*, Table 4.I-2. As shown in Table 4.I-2, the Project would be consistent with the applicable LRMP policies. Therefore, recreational resources impacts with respect to this plan would be less than significant.

3. MITIGATION MEASURES

No mitigation measures are necessary.

4. CUMULATIVE IMPACTS

4.K-3 The build-out of the Project in combination with cumulative development within the Town or surrounding National Forest lands would result in less than significant cumulative recreational impacts.

The Project would have a beneficial land use effect in that it would add to the area's recreational resources. The on-going development of the trails, improvements to recreational nodes, signage, and other associated components under the Project would not, in itself, be considered cumulative. Other cumulative development that would result in additional recreational resources would also likely benefit the community. Because the Project would not result in adverse recreational impacts, the build-out of Project, in combination with other cumulative development would result in less than significant cumulative recreational impacts.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would result in less than significant recreation impacts. Thus, no mitigation measures are necessary.

Table 4.K-1

**Consistency of the Project with Applicable Policies
of the Town of Mammoth Lakes General Plan**

Policy	Consistency Analysis
Recreational Opportunities	
<p>P.4. GOAL: Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.</p>	<p>Consistent: The Project would provide a wide variety of outdoor recreational uses and enhance access to outdoor recreational resources.</p>
<p>P.4.A. Policy: Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.</p>	<p>Consistent: TSMP Recommendation G12 recommends that the Town seek opportunities to form partnerships with local non-governmental organizations that may be able to assist in the planning, development and/or maintenance of the trail system. In addition, the incorporation of the SHARP, which is the product of a diverse coalition of volunteer citizens, the Town and the USFS, indicates the the commitment of the Town to coordinate with multiple agencies and jurisdictions in the development of the trail system.</p>
<p>P.4.B. Policy: Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors. Activities include but are not limited to:</p>	<p>Consistent: The trail system envisioned under the Project would provide increased access for residents and visitors to the activities identified in the policy.</p>
<ul style="list-style-type: none"> • Downhill skiing & snowboarding • Day & backcountry hiking • Cross-country skiing • Walking • Back-country skiing & snowboarding • Interpretive trails & signage • Snowshoeing • Climbing • Sledding • Touring • Dog sledding • Street & mountain biking • Snowmobiling • Fishing • Sleigh rides • Ice skating • Camping • Fall-color viewing • Tennis • Birding • Swimming • Health & fitness • Soccer • Off-highway vehicles • Racquetball • Equestrian activities • Snow play • BMX 	
<p>P.4.C. Policy: Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.</p>	<p>Consistent: The Project would accommodate a balance of motorized and non-motorized activities, including enhancement of OHV and OSV access, while expanding non-motorized trails and trailheads. The Project would also support the separation of motorized and non-motorized activities, as evident in the TSMP’s support of MUPs through Recommendations MUP1 through MUP4</p>

Table 4.K-1 (Continued)

**Consistency of the Project with Applicable Policies
of the Town of Mammoth Lakes General Plan**

Policy	Consistency Analysis
<p>P.4.C.1. Action: Specifically address use, needs and operations of motorized and non-motorized recreation users in a year round comprehensive recreation plan.</p>	<p>which include MUP projects within The Town and beyond the UGB; Recommendation X3 for grade-separation of MUP crossings of arterial streets; and Recommendations B2 and B3 which include bike lanes on major arterials and collector streets; and Recommendation B4 which includes bike lanes on local streets and recommends measures to increase separation between motor vehicles and bicycles.</p> <p>Consistent: The Project is a comprehensive plan that addresses the needs and operations of motorized and non-motorized recreation users.</p>
<p>Connected Throughout</p> <p>P.5. GOAL: Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes.</p>	<p>Consistent: Figures 2-1 to 2-7 in Section 2.0, <i>Project Description</i>, identify the Town’s existing and proposed trail facilities. As shown therein, the proposed trail facilities would help link the Town’s parks and open space facilities.</p>
<p>P.5.B. Policy: Design and construct trails as components of a regional and local network for recreation and commuting.</p>	<p>Consistent: The Project would provide a regional and local network for recreation and commuting. The program of MUPs, bike paths, and bike routes within the Town would improve connections to recreational facilities throughout the Town and in the adjacent Lakes Basin and Mammoth Mountain area. For example, the development of the SHARP Project No. 6 (summer) would connect the existing MUP at Mammoth Park East to the future network of recreational trails on USFS lands. The TSMP also recognizes the importance of bicycle commuting for work, errands, and school and would expand the network of MUPs, bike lanes, and bike routes available for commuting. Commuter routes would be supported by improved maintenance of trails, safety features at crossings, separated grades, improved location and wayfinding signage, and education and signage to keep drivers alert for cyclists. Recommendation MUP4 would also provide for MUPs to access farther recreational areas and other outlying areas. Under MUP4, Paths outside the UGB include the Mammoth Creek Path, which could be constructed on or adjacent to Mammoth Creek Road. This route would extend the reach of the recreational network and provide an alternative to US-203 for long distance road rides.</p>
<p>P.5.C. Policy: Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.</p>	<p>Consistent: The Town will review future development projects to ensure that trail corridors are incorporated into project site plans consistent with the TSMP.</p>

Table 4.K-1 (Continued)

**Consistency of the Project with Applicable Policies
of the Town of Mammoth Lakes General Plan**

Policy	Consistency Analysis
P.5.C.1. Action: Prepare an expanded Master Plan to link trails, parks and open space.	Consistent: The Project takes into consideration linkages between the Town and adjacent National Forest lands and a growing network of paths and trails that would enhance connections between the Town and parks and open space in an extended area.

Source: PCR Services Corporation, 2011.