

## 4.3 FORESTRY RESOURCES

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The majority of lands peripheral to the Town's Urban Growth Boundary (UGB) are located within the Inyo National Forest and administered by the United States Department of Agriculture Forest Service (USFS). Some of the proposed improvements in the Mobility Element Update include the construction of roads or multi-use-paths (MUPs) within Inyo National Forest lands. The proposed Land Use Element/Zoning Code Amendments are applicable to the Town's commercial districts and would not affect forest lands. This section addresses applicable programs and plans [i.e., Inyo National Forest Land Resources and Management Plan (LRMP)], existing conditions, and the potential for the Mobility Element Update to have an impact on forestry resources. This section is based in part on the Trails System Master Plan (TSMP) EIR, which is incorporated by reference. For a discussion regarding potential impacts to trees within the UGB, please see Section 4.1, Aesthetics, and 4.2, Biological Resources, of this EIR.

### 1. ENVIRONMENTAL SETTING

#### a. Regulatory Framework

##### 1. Federal

###### (a) USDA Forest Service Region 5

The USDA Forest Service (or USFS) Region 5, also known as the Pacific Southwest Region, has responsibility for 20 million acres of National Forest land in California, including the Inyo National Forest, and assists the state and private forest landowners in forest management. The Region's State & Private Forestry (S&PF) program provides financial and technical assistance to state and local governments, Native American groups private organizations, urban communities and others to help protect forest resources and assist landowners in practicing good stewardship and quality land management. Forest conditions, especially in Southern California and the Sierra Nevada, are of particular concern in Region 5 because, according the USFS, dense and overgrown areas combined with the influx of people into California's wildlands have created the potential for disastrous wildfires. As such, Region 5 places emphasis on actively managing forests by reducing dangerous accumulations of hazardous fuels to protect people, watersheds, and habitat.<sup>1</sup>

###### (b) National Forest Management Act

The National Forest Management Act (NFMA), which establishes the USDA Forest Service as the managers of the nation's forests, provides that all forested lands in the National Forest System shall be maintained as appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure maximum benefits of multiple use in accordance with land management plans (Section 4. Section 3(d)(1)). Under Section 11 Section 13, Limitations on Timber Removal, the Secretary of Agriculture shall limit the sale of timber from each national forest on a sustained-yield basis. Respectively, the NFMA prohibits the cutting or otherwise damaging any timber, tree, or other forest product, except as authorized by a special-use permit. Under 36 Code of Federal Regulations (CFR) 261.6 (a) cutting, removing, or otherwise damaging any timber, tree, or other forest product, except as authorized by Federal law,

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<sup>1</sup> <http://www.fs.usda.gov/detail/r5/about-region/?cid=stelprd5274212>, accessed September 1, 2015.

regulation, permit, contract, special use authorization is prohibited and (b) no tree can be cut before a Forest Office has marked it or otherwise designated the tree for cutting. The special-uses program authorizes uses on national forest land that provide a benefit to the general public and protect public and natural resources values. 36 CFR 1.1 allows a permit to be issued to authorize an otherwise prohibited or restricted activity or impose a public use limit. The activity authorized by a permit shall be consistent with applicable legislation, federal regulations and administrative policies, and based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, scientific research, implementation of management responsibilities, proper allocation and use of facilities, or the avoidance of conflict among visitor use activities will not be adversely impacted.

36 CFR 251.50 (a) establishes the scope of “special use” permits on National Forest lands. According to this statute, all uses of National Forest System lands, improvements, and resources, except those authorized by the regulations governing shared use of roads are designated “special uses.” Before conducting a special use, individuals or entities must submit a proposal to the authorized officer and must obtain a special use authorization from the appropriate office. 36 CFR 251.53 (j) allows temporary or permanent easements for road rights-of-way over lands and interests in land administered by the Forest Service.

### **(c) Inyo National Forest Land and Resource Management Plan**

The purpose of the Inyo National Forest Land and Resource Management Plan (LRMP) is to provide integrated multiple resource management direction for all Inyo National Forest resources. Chapter 2 of the LRMP identifies issues and concerns identified during the development of the plan. Identified needs are the construction of trails and the improvement of existing trails; the need for trails specific to cross-country trails, hiking and handicapped trails; the need to locate, design, and construct trails to provide the desired experience while minimizing resource damage. The LRMP identifies the greatest need for new trails in concentrated recreation use areas and Nordic ski areas.

The LRMP includes monitoring of more than 20 broad resource categories ranging from air quality to wilderness. Chapter 5 (Management Direction) of the LRMP provides management goals, objectives, standards and guidelines, prescriptions and direction for each of the 20 management areas. Proposed roadway and MUP improvements are located in both LRMP Management Area No. 8 (Mammoth Escarpment) and Management Area No. 9 (Mammoth). A goal of the LRMP is to continue a land and resource management program with non-federal lands through special use administration, landownership adjustment, and other measures. Another goal is to provide a broad range of developed and dispersed recreational opportunities.

LRMP policies include the acquisition of lands with easements to assure access to public lands and resources. A general objective of the LRMP is to construct and maintain facilities to regional standards and to design at least 10 percent for the physically limited.

Objectives and guidelines related to Management Areas No. 8 and No. 9 include the following:

Management Area No. 8 (the regional forested area around the Town of Mammoth Lakes):

- Identify and program dispersed trail facilities in the Mammoth Lakes Basin, including 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 the trail system with the community.

Management Area No. 9 (the forested area in proximity to the Town of Mammoth Lakes UGB)

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

## 2. State

### (a) California Code of Regulations, Title 14

The California Code of Regulations (CCR), Title 14, Div. 1.5, requires any person who wishes to convert timberland to uses other than growing timber on all but non-federal lands, to obtain a conversion permit from the California Department of Forestry and Fire Protection (CalFire). Timberland is defined by Public Resources Code (PRC) Section 4526 to be land, other than federal land, which "...is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber." The Board of Forestry has defined commercial species to include conifers but not hardwoods. Under Title 14 [RM-73 (1102.1bc)], uses that are exempt from the State's Conversion and Timber Harvesting Plan Requirements (Notice of Timber Operations) include the removal of trees for public rights of way. Title 14 would only be applicable to private, state, county or other non-federal lands. Title 14, Section 1280 also provides for Fire Hazard Severity Zones (FHSV) for counties in the state. For instance, based on CalFire input, Tom's Place (south of Lake Crowley) is upgraded from "moderate" to "high" to reflect greater hazard potential in Pinyon pine and juniper areas of relatively deep soils. No such designation has been applied to the Mammoth Lakes area.

### (b) Sierra Nevada Forest and Community Initiative Action Plan

State Assembly Bill 2600 (enacted in 2004) created the Sierra Nevada Conservancy (SNC), the responsibility of which is to (i) reduce the risk of natural disasters, such as fire; (ii) support efforts that advance both environmental preservation and the economic well-being of Sierra residents in a complimentary manner; and (iii) aid in the preservation of working landscapes for California's state, federal, and private forest lands (approximately 10.5 million acres). The SNC, in partnership with the USFS, launched the Sierra Nevada Watershed Improvement Program, a collaborative program to restore the health of California's primary watersheds through increased investment and needed policy changes. The resulting policies are set forth in the Sierra Nevada Forest and Community Initiative (SNFCI) Action Plan (adopted December 4, 2014).

The focus of the SNFCI Action Plan is to address key issues and impediments affecting successful achievement of increased forest resiliency through restoration in the Sierra Nevada Region. This plan largely serves as a regional blueprint to guide the development of watershed level plans. According to the SNFCI, the restoration and protection of the health of forests and other habitat and landscapes is the primary focus of the health of California's primary water source. Key objectives of the Action Plan are to:

- Identify and quantify the specific projects needed to restore Sierra Nevada forests to a state of resilience and the cost of their implementation. This data will include factors beyond the natural landscape, including but not limited to wood and biomass processing infrastructure capacity and local capacity for collaboration.
- Increase state and federal investment in forest restoration activities, as well as securing investment from downstream beneficiaries and the private sector. The SNFCI Action Plan will be used as an engagement tool to attract investment in the Sierra Nevada by clearly identifying the benefits of restoring forest resiliency, as well as the negative consequences of failing to do so.
- Address state and federal policy issues that will remove impediments and increase the pace and scale of forest restoration and improving the socioeconomic well-being of Sierra communities. While additional investment for needed restoration is critical, this plan identifies a number of policy issues currently serve as impediments to restoration.

### 3. County

#### (a) Mono County Regional Transportation Plan and General Plan Update

The purpose of the adopted Mono County General Plan (1992) is to establish policies to guide decisions on future growth, development, and conservation of natural resources in the unincorporated area of the county. The plan reflects community-based planning and includes individual area plans for Mono County communities. As discussed in the adopted General Plan, approximately 94 percent of the land in Mono County is publicly owned; approximately 88 percent of the public land is managed by the USFS, and other public agencies. According to the adopted General Plan, because such a great percentage of the land in the county remains open space and since the County has no direct authority over much of that land, one of Mono County's main concerns about open space is coordinating county policies with the land use policies of the agencies managing the public lands.<sup>2</sup> The County is also concerned about the impacts of federal open space policies on county resources.

The Mono County General Plan Update (2015) also states that the County has limited direct planning authority over only a small percentage of the lands in the county and, therefore, must work with other land managers to manage the natural resources in the area.<sup>3</sup> Under the adopted General Plan and Draft General Plan Update, the unincorporated County area around the Town of Mammoth Lakes is designated as Resource Management (RM),<sup>4</sup> which is intended to recognize and maintain a wide variety of values in the lands outside the existing communities. According to the General Plan Update, land use designations reflect federal designations.

#### b. Existing Conditions

The Inyo National Forest covers parts of the Sierra Nevada Mountains of California and the White Mountains of California and Nevada. The forest, which stretches from the east side of Yosemite to south of Sequoia National Park, covers approximately 1,903,381 acres and nine designated wilderness areas that protect over 800,000 acres. Geographically, it is split in two, on each side of the Long Valley Caldera and Owens Valley.

<sup>2</sup> *Mono County General Plan, Conservation and Open Space Element, 2012, page V-3).*

<sup>3</sup> *Mono County General Plan, page II-105, 2015.*

<sup>4</sup> *Mono County General Plan, Figure 72.*

The forest also harbors approximately 238,000 acres of old-growth forests, the most abundant of which are Lodgepole Pine and Jeffrey Pine, which occur in the Town of Mammoth Lakes and vicinity. Forest lands in the Sierra Nevada Mountains are used for recreational purposes or as timber and biomass harvested under state and federal regulations. The condition of existing forests has been impacted by climatological effects and drought in recent years. According to the SNC, Sierra forests and meadows play a role in ensuring water quality and reliability for the state and ongoing drought, rising temperatures, and changing precipitation patterns create an urgent situation for the forests and the state as a whole.<sup>5</sup> As discussed in the SNC's "Drought and the Sierra Nevada" report, Sierra forests are overgrown and unhealthy. Current drought conditions will likely increase the frequency of large, damaging wildfires. The SNC has listed USFS forests as having 75 percent "high severity" for wildfire and National Park Service forests as the lowest severity at 46 percent.<sup>6</sup> CalFire identified the East Sierra Subregion as having the smallest high priority landscape, with approximately 36,250 acres.<sup>7</sup> Forests to the north and northeast of the Town of Mammoth Lakes are shown as having low standing biomass per acre<sup>8</sup> and no productive forest priority for CalFire's "landscape priority for restoring forests from pest impacts" and low priority for preventing "future pest outbreaks in forests."<sup>9</sup> Forests in Mono County are also indicated by CalFire to have the lowest (0 – 1 percent) watershed priority for restoration of wildfire damaged ecosystems.<sup>10</sup>

However, dead and dying coniferous trees are evident throughout the Inyo National Forest. According to the Inyo National Forest website, drought is a major factor which has contributed to the population explosion of mountain pine beetle, which has resulted in broad areas of diseased and dying trees. This outbreak is estimated to have started in 2005 and still appears to be active. Areas of Inyo National Forest, such as White Wing Mountain, June Mountain, Rock Creek-Hilton Lakes, and Gibbs Lake have been severely infested, some sites losing up to 95 percent of overstory cover. Groups of up to 50 trees are found to be completely infested and dead. June Mountain appears the hardest hit, with beetle populations still moving east toward Highway 395.<sup>11</sup>

According to the SNC, the East Subregion of Sierra forests, including Mono County has the fewest acres of productive forestland (just over half a million acres) and the highest public ownership, including Inyo National Forest and Bureau of Land Management (BLM) Lands. These constitute approximately 97 percent of the forest ownership. According to SNC's System's Indicator report, productive forest types in Mono County are primarily "Eastside Pine," with small areas of "mixed conifer."<sup>12</sup> These resources occur in the region of June Lake and Mammoth Lakes, to the west and north and to the east/northeast of these areas in the mountain regions forming the edges of the Long Valley Caldera and Owen Valley. This area is generally framed by Mammoth Mountain on the west and Mono Lake Basin Road (State Route 120), between U.S. Route 395 and U.S. Route 6, to the north and east.

<sup>5</sup> *Sierra Nevada Conservancy, Drought and the Sierra Nevada, April 2015.*

<sup>6</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 7, Percentage of Acreage in Each Condition Class by Land Ownership, page 12.*

<sup>7</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 8, Landscape Priority for Addressing Wildlife Threat by Subregion, page 14,*

<sup>8</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 18, Forest Biomass – Tons of Standing Biomass per Acre, page 28.*

<sup>9</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 15 and 16, pages 22 and 23.*

<sup>10</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 13, page 19.*

<sup>11</sup> <http://www.fs.usda.gov/main/inyo/learning/nature-science>, accessed September 1, 2015.

<sup>12</sup> *Sierra Nevada Conservancy, Op. Cit., Figure 1, Productive Forest Types in the SNC Region, page 5.*

## 2. METHODOLOGY AND THRESHOLDS

### a. Methodology

The analysis focuses on the proposed improvements identified in the Mobility Element Update that could impact forestry resources. More specifically, the conceptual alignments shown in the Mobility Element Update (i.e., MUPs and roads) evaluated to determine if the conceptual alignments would cause the potential removal of forest trees or substantial timber resources. The evaluation of impacts describes the locations of new roads and MUPs within the Inyo National Forest and the potential effects on forest resources and the applicability of existing regulations pertinent to potential tree removal or loss. Where removal of trees is anticipated, mitigation measures are offered to reduce impacts discussed in the evaluation.

### b. Thresholds

For purpose of this EIR, the Town has utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether the Project would have a significant environmental impact regarding forestry resources. The Project would result in a significant impact to forestry resources if the Project would:

**FOR-1** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

**FOR-2** Result in the loss of forest land or conversion of forest land to non-forest use.

The Land Use Element/Zoning Code Amendments would affect properties within the commercial districts in the Town's UGB. As such, the Land Use Element/Zoning Code Amendments would not affect lands that are zoned as forest land or forestry resources. Therefore, this section focuses on the improvements proposed as part of the Mobility Element Update.

### c. Applicable General Plan Goals/Policies and Adopted Mitigation Measures

The Town of Mammoth Lakes General Plan and Zoning Code address the effects of development within the Town. However, because the General Plan and Zoning Code do not address forestry resources within the Inyo National Forest, they are not applicable to the following environmental analysis. The Mitigation Monitoring and Reporting Program (MMRP) for the TSMP EIR contains the following mitigation measures that are applicable to the trails component of the Mobility Element Update, which are located within Inyo National Forest lands:

**TSMM 4.A-3.B:** Mature, healthy, native trees shall be circumvented or avoided through the design of trail alignments to the extent feasible. The need for replacement of trees shall be evaluated and implemented based on Healthy Forest and Fire Safe Council principles.

**TSMM 4.G-1:** As individual projects are implemented under the TSMP, the Town shall undertake actions when applicable to reduce the risk of wildfires. On National Forest lands, these actions shall be coordinated with the USFS to ensure consistency with that agency's

standards and guidelines. Specific actions may include but are not limited to: 1) maintain and incorporate design features to facilitate use of MUPs and other facilities, where feasible and appropriate to accommodate emergency vehicles; 2) provide signage at trail heads and along trails relating to fire prevention (i.e., No Smoking signs, fire danger level signs); 3) provide fuel modification and other fuel treatment applications within Project Areas where appropriate; 4) ensure the maintenance and patrol of trails in the Project Area; and, 5) enforce curfews or other rules to limit unwanted activity in Project Areas during daylight hours and after-hours.

### 3. ENVIRONMENTAL IMPACTS

**Threshold FOR-1:** The project would result in a significant impact if the project would conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

**Impact Statement FOR-1:** *The Mobility Element Update proposes the construction of new streets and MUPs within the Inyo National Forest lands that could potentially conflict with the designated forest use. However, the NFMA allows for permitted special use rights of way easements in which environmental and administrative effects are appropriately addressed. With compliance with the requirements of NFMA, the Project would be allowed within National Forest lands and would not conflict with designated forest uses or cause the rezoning of forest lands.*

The Mobility Element Update proposes the construction of new streets, including streets to the north of Main Street, in the vicinity of the Old Mammoth Road north terminus, and the construction or extension of MUPs outside the UGB. Anticipated new or extended MUPs within the Inyo National Forest include MUP's along Mammoth Scenic Loop, extensive new MUPs in the Shady Rest Park area, a MUP around Lake Mary and a MUP to the south of the Snowcreek Area. New streets and MUPs outside the UGB would extend into Inyo National Forest land surrounding the Town of Mammoth Lakes. However, no new roadways or MUPs under the Mobility Element Update would encroach into USFS "Wilderness" areas, which are more highly restrictive than the nearby Inyo National Forest lands. No other public or private properties outside the UGB, such as BLM or Los Angeles Department of Water and Power (LADWP) lands would be affected by new road or trail projects. Under the Mobility Element Update, no stands of forest trees that are not within the future road and MUP rights of way would be removed for commercial timber or other uses.

Because National Forest lands are designated for the maintenance of forest resources, any development within the National Forest, including the construction of streets and trails that would result in the potential removal of trees, would potentially conflict with the National Forest designation and be subject to the requirements of the NFMA. The NFMA prohibits the cutting or otherwise damaging of any timber, tree, or other forest product, except as authorized by a special-use permit. The special-uses program authorizes uses on national forest land that provide a benefit to the general public and protect public and natural resources values. NFMA allows a permit to be issued to authorize an otherwise prohibited or restricted activity or impose a public use limit, if the activity would be consistent with applicable legislation, federal regulations and administrative policies, and based upon a determination that public health and safety, environmental or scenic values, implementation of management responsibilities, or proper allocation and use of facilities would not be adversely impacted. The NFMA also establishes the scope of special use permits on National

Forest lands, which under 36 CFR251.53 (j) allows temporary or permanent easements for road rights-of-way over lands and interests in land administered by the Forest Service.

The proposed roadways and MUPs would qualify as special uses under the NFMA. The adopted mitigation measures, which are incorporated into the Project from the MMRP for the TSMP, would reduce environmental and scenic effects of the proposed MUPs to less than significant levels. The reduction of a Project's environmental impacts is a key requirement of the NFMA in allowing a special use. Environmental impacts and any respective mitigation measures associated with new street development are addressed throughout the analyses contained in this Draft EIR. In particular, Sections 4.1, Aesthetics, and 4.4, Biological Resources, of this Draft EIR provide analyses of the proposed street improvements relative to visual impacts and impacts on biological resources. As described in the respective sections of this Draft EIR, the Mobility Element Update would not result in adverse environmental and scenic effects. In addition, management responsibilities of public uses, new streets and MUPs would be assumed by the Town of Mammoth Lakes. The use and allocation of facilities would be appropriately managed as required under the NFMA. As such, these uses would be consistent with the NFMA requirements for permitted easements and would not conflict with the National Forest designation or cause the rezoning of National Forest lands to other uses.

The Project would also be consistent with the objectives of the LRMP, which comprises the regional forest area around the Town of Mammoth Lakes. The applicable LRMP policy is to identify and program dispersed trail facilities in the Mammoth Lakes Basin, including opportunities for mountain bike trails within the Management Area and to interface the trail system with the community. Because the Mobility Element Update would be consistent with the requirements of the NFMA and with the objectives of the LRMP, it would not conflict with the objectives of the Inyo National Forest's designated uses. Impacts with respect to forest land would be less than significant.

### Mitigation Measures

Impacts related to forestry resources zoning would be less than significant and no mitigation measures are necessary.

**Threshold FOR-2:** The Project would result in a significant impact if the Project would result in the substantial loss of forest land or conversion of forest land to non-forest use.

**Impact Statement FOR-2:** *The development of new streets and MUPs could result in the removal of trees within the Inyo National Forest. The Project would not involve large tracts of forest lands or any associated removal of trees for timber. With the implementation of adopted and proposed mitigation measures, the Project would not result in the substantial loss of forest land or conversion of forest land to non-forest use.*

Roadways outside the UGB would be limited to a few streets to the north of Main Street in the proximity of the Main Street/Old Mammoth Road intersection. MUPs would extend into forested areas along the Mammoth Scenic Loop, multiple paths in the Shady Rest Park area, and around Lake Mary. Because these areas are heavily forested, the development of trails and the roads would result in the removal of forest trees. The final design for the proposed MUPs would comply with TSMM 4.A-3.B, which requires that healthy, native trees would be circumvented or avoided through the design of trail alignments to the extent feasible. Mitigation Measure FOR-1, below, would provide similar consideration in the final alignment of

future streets in the National Forest land. The lands along the edges of the future roadways and MUPs within Inyo National Forest land are not intended for other development or conversion of forest land to non-forest uses. With the implementation of these measures, the removal of forest trees for future street and MUP rights of way would not result in the substantial loss of forest land or conversion of forest land to non-forest use alignments.

The location of roads and trails within the Inyo National Forest would also have the secondary effects of exposing forest land to human-caused fire and, as such, a potential loss of forestry resources. TSMM 4.G-1 would reduce this potential effect to a less than significant level in relation to new road and trail development. Because this implementation measure would address increased risk of wildfire and the rights of way easements through forest lands would not affect large tracts of contiguous forest trees adjacent to the MUPs or road alignments, impacts with respect to the loss of forestry resources would be less than significant.

### Mitigation Measures

The roadway alignments could result in the removal of trees on the National Forest land, which could result in a significant impact. Therefore, the following mitigation measure is recommended.

**MM FOR-1:** Mature, healthy, native trees shall be circumvented or avoided through the design of roadway alignments to the extent feasible. The need for replacement of trees shall be evaluated and implemented based on Healthy Forest and Fire Safe Council principles.

## 4. CUMULATIVE IMPACTS

The Town of Mammoth Lakes current related projects are not located within USFS lands or other areas with forestry resources and, as such, would not significantly impact forestry resources. The construction of any other private or public development projects within National Forest lands would be considered related in that these projects could result in the removal of forest trees. Under the Town's Parks and Recreation Master Plan, the Town would potentially expand services on Inyo National Forest lands in Shady Rest Park, Mammoth Creek Park East, and Sherwin Area Recreation Master Plan (SHARP) area. The MND developed for the Town of Mammoth Lakes Parks and Recreation Master Plan found that potential development of these parks would have less than significant impacts on forestry resources<sup>13</sup> The Mono County Master Plan anticipates expanded recreational facilities in the June Lake Loop, a forested area in the Inyo National Forest located approximately 10.5 miles to the northwest of the Town of Mammoth Lakes. The Mono County Regional Transportation Plan and General Plan Update did not identify any potential impacts on forestry resources resulting from the County General Plan Buildout, including the June Lake Loop.<sup>14</sup>

Any expansion of Town of Mammoth Lakes and Mono County recreational facilities in the Inyo National Forest would be subject to special permit approvals under the NFMA, which is intended to protect forestry resources. The analysis above determined that potential trails and roads within USFS lands under the Mobility Element Update would not result in significant impacts on forestry resources. A special use permit under NFMA authorizes uses on national forest land that provide a benefit to the general public and do not

<sup>13</sup> *Town of Mammoth Lakes, MND for the Parks and Recreation Master Plan, 2012.*

<sup>14</sup> *County of Mono, Regional Transportation Plan and General Plan Update EIR, July 31, 2015.*

adversely impact the environment. Special uses must be determined by the USFS to protect public and natural resources; to provide public health, safety, and environmental benefits; and to not allow for a substantial loss in forestry resources. Because all recreational expansions or uses within USFS land must comply with NFMA, and Town of Mammoth Lakes and Mono County related projects were found to be not significant, the related projects in combination with the Mobility Element Update would not result in cumulatively significant impacts on forestry resources.

## **5. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The Mobility Element Update would result in significant impacts with respect to substantial loss of forest land or conversion of forest land to non-forest use. However, with the incorporation of previously adopted mitigation measures and the implementation of MM FOR-1, impacts would be reduced to a less than significant level.