

July 7, 2020

Gordon Martin  
Mammoth District Ranger  
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Established in 2014, the mission of Mammoth Lakes Recreation is to enhance recreation, arts, culture, and mobility in the Eastern Sierra. Please consider the proposed Lakes Basin and Sherwins Area Trail Enhancement Project for its benefits to sustainable recreation, the Mammoth Lakes community, and land-management policy that is consistent with the mission of the U.S. Forest Service and Inyo National Forest Land Management Plan, based on the following rationale.

**Background, Planning** The proposed trail improvements have been developed in cooperation with the U.S. Forest Service through public process and formal studies dating back to 2008 ([Sherwin Area Trails Special Study](#)). In 2009, the [Sherwins Working Group](#), an “independent, community-based body of stakeholders” conducted public meetings over the course of a year, with a purpose of providing “safe and environmentally responsible use [...] to minimize conflict between different forms of recreation and between recreation of all types and the environment”. The Solitude Canyon proposal was derived from this effort and subsequent adoption of the [Sherwins Area Recreation Plan](#). In 2010, the TOML, U.S. Forest Service, Mammoth Lakes Trails and Public Access (MLTPA), and Friends of the Inyo (FOI) partnered to develop the [Lakes Basin Special Study](#) which determined a need to “preserve and enhance existing facilities” and provide “sustainable access and natural-resource protection” in the project area. The proposed Mammoth Lakes Basin connector trails are consistent with the findings of this Special Study, and input provided by NGO partners including MLTPA, and FOI.

**Equitability, Connectivity** Further rationale is derived from the TOML [Walk Bike Ride Action Plan](#) (2017) to promote “bicycle, pedestrian, transit, and parking alternatives within the community”. The proposed Solitude Canyon Trail is specifically designed to be accessed from existing U.S. Forest Service trailheads, multi-use pathways, and the to-be-constructed Sherwins Trailhead for which NEPA/CEQA is already complete. This trailhead will provide free public transit (trolley) access adjacent to an underserved, “[Disadvantaged Community](#)” as defined by the State of California. While there is an abundance of multi-use trails that may be accessed with purchase of a Mammoth Mountain Bike Park pass, there are few opportunities provided to “underserved communities, minorities and urban youth” (see [Inyo National Forest Land Management Plan](#); Objectives). This project will disperse users, provide multi-modal accessibility, reduce the need to drive and park/repark vehicles in the Sherwins and Lakes Basin Area(s), and will provide free and equitable public access for all trail-system users.

**Construction, Maintenance** The Inyo National Forest Land Management plan cites a Sustainable Recreation goal of “Promote[ing] effective communication with gateway communities to help foster partnerships, inspire volunteers, educate the public, and support stewardship that contributes to funding, implementation of projects, and long-term maintenance of facilities”. The TOML currently contributes substantively to on-going and deferred maintenance of U.S. Forest Service system-trails under formal partnership agreements, and the proposed actions will be funded and maintained by TOML [Special-Use Tax Measure R](#). TOML also directly funds the FOI *Trail Ambassador* and Mammoth

Lakes Trail System (MLTS) *Trail Host* programs to provide on the ground interpretive and educational services to trail-system users. These services will be leveraged to ensure visitors are educated on allowed uses and trail-system etiquette. TOML is also currently engaged with the Mammoth Ranger District to develop a comprehensive regulatory sign-package for installation at all trailheads and public-access nodes within the MLTS. This project is intended to provide robust wayfinding, trail-system etiquette, and to minimize MLTS conflicts between users. These programs provide the MLTS with on-the-ground resources not found at any other developed recreation setting forest-wide.

**Environmental Compliance** As the community’s leading advocate for sustainable recreation, Mammoth Lakes Recreation believes any project’s impacts to the environment should always be of paramount concern. It is our understanding that based on preliminary review of this project, there are no extenuating circumstances that would preclude use of a Categorical Exclusion under the NEPA process, and that this process is consistent with other trail projects occurring on federally managed public lands nation-wide. With all “appropriate and legally required environmental studies and consultations” being conducted in support of this project including careful consideration of cultural resources, soils, flora, and fauna – MLR fully supports the efforts of the U.S. Forest Service to work cooperatively with the TOML and ID Team Specialists to construct and maintain the proposed system of trails. Project implementation based on these criteria will reduce resource damage and serve Mammoth Lakes’ unique ecology of which humans are an integral part.

**User-Created Trails:** Due to the absence of multi-use non-wilderness trails *on a landscape level*, hundreds of miles of user-created trails have been illegally constructed within the last 5-10 years throughout the Eastern Sierra, including several within the project-area. These trails are not being constructed with any form of environmental review and in many cases, directly impact sensitive cultural and natural resources that need protecting. These user-created trails contribute to non-point source impacts to water quality and negatively impact wildlife and forest resources. Sustainably built trails adhere to U.S. Forest Service BMPs, provide consistent grade, avoid sensitive cultural and natural resources, and minimize the need for on-going maintenance. Impacts to public lands will continue to escalate if the U.S. Forest Service does not work collaboratively with its regional partners to provide sustainable trails-based opportunities. The proposed trail-alignments were selected based on preliminary review with U.S. Forest Service staff, and are anticipated to be the least impactful to the environment and demanding of agency resources. User-created trails cannot be maintained, are nearly impossible to enforce, consume agency-resources, and are harmful to resources. Where possible, this project will make use of prior disturbed areas and existing roads and trails to minimize impacts.

**Further Rationale:** The Inyo National Forest has a proposed action to implement *forest-wide* broadcast burning on a scale of 1,000-2,000 acres per year. The project is anticipated to be Categorically Excluded from the NEPA process based on its implied benefits to forest health and, “appropriate resource surveys [being] completed prior to implementation.” The 15 miles of proposed trails included in this project should be similarly considered for its benefits to forest health, and comparatively small-scale. Also, given recent COVID-19 closures and the resurgence of visitors despite the governor’s “stay at home order” and absence of all destination-marketing – there is an obvious need to better disperse users and provide well-maintained public access points for visitors of the Mammoth Lakes Basin. COVID-19 has also reinforced the need for better public/public partnership and pragmatism in providing economic sustainability to the region and improving forest-health.

**Sustainable Recreation and Tourism:** According to the 2018 report entitled Profile of [Mono Visitors & Economic Impacts of Tourism](#) Mono County receives approximately 1.73 million visitors annually, which then extends out to 4.15 million visitor days per year. This same report listed hiking and the top recreational activity for the area, which 57% of all visitors engaging in the activity. The participation percentage of Mountain Biking was substantially less (5.5%), and equine use was less than one-percent.

The popularity of hiking has resulted in enormous pressure being placed on our existing trails and trailheads, especially in and around the Town of Mammoth Lakes. This necessitates the need to either reduce or limit traffic to our existing resources or expand the number of trails in our trail network. The addition of the Sherwin's Area Trail Enhancement Project will help sustain our existing trail resources by adding an additional eight miles of sustainably-designed and constructed trail. This also benefits our community by providing them with the same amount of net new multi-use trail on which to recreate.

Please consider the Lakes Basin and Sherwins Area Trail Enhancement Project for those reasons stated above. The Inyo National Forest Land Management Plan cites the need to "connect people to nature" and "promote effective communication with gateway communities to help foster partnerships [...] that contributes to funding, implementation of projects, and long-term maintenance of facilities." It is our belief that the proposed Lakes Basin and Sherwins Area Trail Enhancement Project is a manifestation of these desired outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew McClain". The signature is fluid and cursive, with the first and last names being the most prominent.

Matthew McClain  
Executive Director, Mammoth Lakes Recreation