



July 7, 2020

Gordon Martin  
District Ranger  
c/o Matthew Paruolo  
[matthew.paruolo@usda.gov](mailto:matthew.paruolo@usda.gov)  
P.O. Box 148  
Mammoth Lakes, CA 93546

Dear Mr. Martin,

The Mammoth Lakes Trails and Public Access Foundation (MLTPA) is grateful for the opportunity to provide comments on the “Lakes Basin and Sherwins Area Trail Enhancement Project” per your Scoping Notice, an anticipated “first step” in your decision-making process under the National Environmental Policy Act (NEPA). As advocates for a holistic Sustainable Recreation program here in Mammoth Lakes and the Eastern Sierra, the undersigned members of the MLTPA Board of Directors enthusiastically support this project – with the qualifications listed below - recognizing the important ecological and community-based benefits of implementing and maintaining a sustainably designed, nonmotorized, interconnected multi-use trail system here in the Mammoth Lakes region. MLTPA values the anticipated outcomes of this project through the establishment of designated National Forest System Trails which will include: increased trail user dispersion; enhanced and diversified trail user experiences; sustainable trail design; the protection of natural and cultural resources; the reduction of user-created trails, and the many economic and public health benefits the project will provide.

### **Background and Context**

MLTPA is proud to have initiated and provided capacity for a number of initiatives that have led to the proposed “Lakes Basin and Sherwins Area Trail Enhancement Project”, and whose broad range of capacities will be critical for the proposed project’s success:

- **“Trail System Master Plan Update” (2007):** MLTPA initiated and secured funding from multiple partners for an updated “Trail System Master Plan” for the Town of Mammoth Lakes by Alta Planning and Design, a nationally recognized leader in the design of integrated mobility and transportation systems. The new “Trail System Master Plan” was adopted by the Town in 2011, including programmatic environmental analysis per CEQA.
- **Measure R: Reliable Funding for Trails, Parks, and Recreation” (2008):** MLTPA financed and led the campaign for Measure R, which was approved by the voters of Mammoth Lakes with 72% of the vote. Pending agreements with the US Forest

Service, Measure R will be the primary source of funding for construction and maintenance of the “Lakes Basin and Sherwins Area Trail Enhancement Project.”

- **“Sherwins Working Group (SWG)” (2009):** MLTPA convened 6,900 + citizen volunteer hours for the community based collaborative planning effort for trails and recreation in the Sherwins region.
- **“Sherwins Area Recreation Plan (SHARP)” (2009):** The product of the Sherwins Working Group, SHARP was adopted by the Town Council along with the updated “Trail System Master Plan 2011, including programmatic environmental analysis per CEQA.
- **“Lakes Basin Special Study (LABSS)” (2012):** MLTPA co-authored the successful grant application and provided staff capacity under contract to the Town for Interagency mobility and outdoor recreation planning for the Mammoth Lakes Basin, funded by a grant from the Sierra Nevada Conservancy.
- **“Recruitment of Trail Manager” (2015):** MLTPA conducted a nation-wide recruitment effort for a “Trails Coordinator” for the Mammoth Lakes Trails System. Joel Rathje, already working in rural California and with a well-deserved reputation for sustainable trail design, was hired as the “Trails Manager” for the Town in August of 2015.

#### **Protecting Natural Resources: Data Collection and Scientific Analysis**

The American public, the community of Mammoth Lakes, and visitors to the region expect that the US Forest Service – through the staff of the Inyo National Forest and/or your designated contractors – will conduct the necessary and required field surveys and scientifically analyze the resulting data collected per law and regulation to inform your decision for this project. MLTPA further requests that your decision account for previous environmental studies that have been conducted in the Sherwins and Lakes Basin region that may be relevant to the proposed trail segments. MLTPA values a science based, holistic, and comprehensive approach to addressing environmental concerns prior to trail project implementation, and requests that the US Forest Service ensure protection of all wildlife species, their habitat, and all other natural and cultural resources that exist within the scope of this project per law and regulation.

#### **Construction of New Trail Segments**

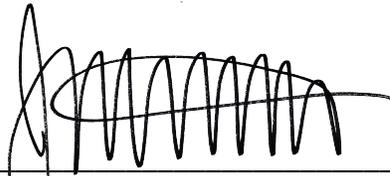
Should you determine – based on scientific analysis of the required field studies and your authority as decision maker – that any segment of the “Lakes Basin and Sherwins Area Trail Enhancement Project” is in need of additional analysis per NEPA, **please also be sure to clearly identify those trail segments that will be immediately eligible for construction.** The construction season here in Mammoth Lakes is notoriously short, and MLTPA appreciates your consideration of this request, in the interest of delivering to the trails community the many benefits that may be realized by constructing new trail segments this season.

MLTPA is a registered public benefit corporation here in California, with 501 C-3 status non-profit status per the Internal Revenue Service. We advocate for, initiate, facilitate, and participate in the planning, implementation, management, and stewardship of a four-season trail system in Mammoth Lakes and the immediate Eastern Sierra. MLTPA believes this project is in accordance with our values and goals, and represents an important opportunity as the community continues to enhance its symbiotic and interdependent relationship with the Federal public lands that surround the community, and which make up 75% of its municipal land base.

Thank you for your consideration of our comments on this project.

Sincerely (for the undersigned),

John Wentworth, President  
John Urdi, Treasurer  
Silver Chesak, Secretary  
Dallas Veitch, Member  
Alistair Veitch, Member

A handwritten signature in black ink, appearing to be 'John Wentworth', written over a horizontal line.

John Wentworth, President  
July 3, 2020