



DECISION MEMO

LAKES BASIN CONNECTOR TRAILS

U.S. FOREST SERVICE

MAMMOTH RANGER DISTRICT

TOWN OF MAMMOTH LAKES

MONO COUNTY, CA

BACKGROUND

The Town of Mammoth Lakes receives an estimated 2.8 million visitors annually (2003), with high and concentrated use occurring in the Mammoth Lakes Basin. A “Destination Recreation Area” (Inyo National Forest Land Management Plan; 2019), these areas are characterized by “high levels of recreation, supported by more facilities, amenities, and services than other areas [and] a variety of activities available.”

Due to increased visitation, limited parking, and persistent resource damage caused by user-created trails, the Town of Mammoth Lakes proposes to construct approximately 2.5 miles of multi-use, non-motorized U.S. Forest Service system trail(s) to provide additional recreation opportunities and connect users to popular destination features and facilities in the Lakes Basin cirque.

DECISION

I have decided to approve the construction of the “Lakes Basin Connector Trails” identified in Appendix B. Trails will be constructed to U.S. Forest Service *Pack and Saddle, Trail Class 3* specifications. Decommissioning of user-created trails, and installation of wayfinding, regulatory, and etiquette signage will be implemented by the Town of Mammoth Lakes in support of the project.

The proposed trail segments located to the south of Lake Mary Road (1.7 miles) will be reconstructed user-created trail with minimal new surface disturbance to make the existing trail more sustainable and meet U.S. Forest Service trail design specifications. There are several user-created trails in this vicinity and the desired outcome is to consolidate use to the ≈ 2 miles of officially designated routes to reduce redundant trails and return the area to a natural state.

The 0.7 miles of trail that connect the Lakes Basin Bike Path (Twin Falls Overlook) to Twin Lakes Campground will be of new construction and will replace a 0.3 mile segment of user-created trail next to the waterfall that has exhibited substantial erosion and ongoing impacts to natural resources. The user-created trail segments will be naturalized with no new ground disturbance.

The management, planning, implementation, and on-going maintenance of the “Lakes Basin Connector Trails” will occur in partnership with the Town of Mammoth Lakes under authorization of



the Mammoth Ranger District as part of the Mammoth Lakes Trail System – a formal partnership agreement between the U.S. Forest Service and Town of Mammoth Lakes to “create an enhanced trails-based recreational experience using a comprehensive program of physical trails improvements; integrated wayfinding and interpretation using both traditional and contemporary communication formats; coordination of volunteer events and programs; and continuing system maintenance” (FS Agreement No. 20-MU-11050400-005). Implementation will be consistent with Best Management Practices (BMPs), Resource Protection Measures, and Design Criteria identified in Appendix A.

This action is categorically excluded from documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS). The applicable category of actions is identified in agency procedures as 36 CFR 220.6 (e)(1) – *Construction and reconstruction of trails*.

REASONS FOR CATEGORICALLY EXCLUDING THE DECISION

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. Inyo National Forest resource specialists conducted field surveys, academic research, and consultation with state agencies pursuant to the National Environmental Policy Act (NEPA). I considered resource conditions identified in agency procedures in determining whether extraordinary circumstances might exist:

- Wildlife habitat is not expected to change significantly. Individual species that occur within the project area are likely habituated to the disturbance due to high seasonal use in Mammoth Lake Basin. The area is a popular multiple use destination ranging from hikers, bikers, equestrian riders, fishermen and many various other user groups. The proposed action is not expected to affect the viability of any population of Species of Conservation Concern. The proposed action will have NO EFFECT to any federally listed species or critical habitat. (Torres, Thomas; Wildlife Report for Lakes Basin Connector Trails Project; Inyo National Forest; January 6, 2021).
- This project area is within the Sierra Nevada Mountains near the Town of Mammoth Lakes, CA in the Mammoth Creek watershed (HUC # 180901020204). It is my determination that the implementation of the Lakes Basin Connector Trail Project proposed action with the inclusion of project specific BMP's and adequate trail design specifications per project plans, will not have or result in significant and adverse impacts to water quality, wetlands or floodplains, municipal water supply, soil productivity and hydrologic function within the project area of potential affect. The project will improve existing degraded trail conditions favorable for maintaining watershed stability, protection of riparian areas and wetlands, and reduce trail use soil erosion and sediment delivery to streams. The project will also help to protect beneficial uses of water. (Shannon, Casey C.; Watershed Specialist Report for Lakes Basin Connector Trails Project; Inyo National Forest; January 20, 2021).
- The project is not expected to limit the persistence for any species or populations of at-risk plants. There are 106 Species of Conservation Concern (SCC) species and one Endangered Species Act (ESA) candidate species on the Inyo NF. Within the project area, no SCC plant species were found. There are no Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species (At Risk). The project is not expected to limit the persistence for any Inyo NF At-Risk Species or populations of at-risk plants. (Engelhardt, Blake; Botanical Review for Lakes Basin Connector Trails; Inyo National Forest; November 16, 2020).



- The project is not expected to adversely impact any American Indian religious or cultural site or practice.
- No adverse effects to six cultural sites assumed eligible for listing on the National Register of Historic Places in the project vicinity are anticipated. (Charlton-Grant and Beidl; Inyo National Forest Report R2020050402443).
- There is no congressionally designated wilderness, wilderness study area, national recreation area, inventoried roadless area, research natural area or potential wilderness within the project area and no effects are anticipated to any such areas.

PUBLIC INVOLVEMENT

Rationale for the proposed trails was derived from public planning processes dating back to 2008 (*Lakes Basin Special Study*), from the Inyo National Forest *Land Management Plan* (2019), the Town of Mammoth Lakes *Trail System Master Plan* (2011), Town of Mammoth Lakes *Walk, Bike, Ride Action Plan* (2017), and informed by a “Recreation Users Council” (Mammoth Trails Committee), made up of representatives of the various user groups and meeting on a bi-monthly basis.

This action was originally listed as the “Lakes Basin and Sherwins Area Trail Enhancement Project” on the Inyo National Forest Schedule of Proposed Actions (SOPA) on June 10, 2020. In addition to SOPA listing, a scoping letter was distributed to Tribes, government agencies, special use permit holders, and non-governmental organizations. This proposal included the construction of “approximately 15 miles of new natural surfaced multiuse, non-motorized trails” connecting the Lakes Basin and Sherwin area(s) by way of Solitude Canyon.

Based on issues raised during the scoping period and preliminary input provided by Inyo National Forest resource specialists, the proposal was revised to include only those elements located within the Mammoth Lakes Basin developed recreation area. The proposed Solitude Canyon trail and its connecting trails to Coldwater Trailhead(s) and Lake Mary Road were removed from consideration as part of the proposed action as documented in a letter sent to interested parties, dated November 8, 2020. The remaining trails identified in the letter (revised proposed action) were largely supported based on their providing additional opportunities for recreation, the presence and proliferation of user-created trails, and increasing impacts to resources.

The primary concerns cited in reference to the “Lakes Basin Connector Trails” include: the proximity of proposed trail alignments to the Twin Lakes Cabin Tract (Recreation Residence) infrastructure, managed under special use permit by Inyo National Forest and; the intersection of proposed trail alignments with approved equestrian routes used by the Mammoth Pack Station and other equine users under special use permit with Inyo National Forest.

In response to these concerns, the Inyo National Forest and Town of Mammoth Lakes designed and rerouted portions of the trail adjacent to the Twin Lake Cabin Tract to avoid permittee infrastructure and sensitive upslope terrain and resources. A robust regulatory and wayfinding program will support trail construction to address potential conflict between user-groups where proposed trails intersect equestrian trails used by the Mammoth Pack Station and other equine users. Interested Parties were contacted and consulted by the Mammoth Ranger District as part of the Public Outreach process.



FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

This decision is consistent with the Inyo National Forest Land Management Plan. The project was designed in conformance with U.S. Forest Service policy to provide additional recreation opportunities while protecting sensitive natural and cultural resources. This decision complies with the Endangered Species Act, Clean Water Act and Section 106 of the Historic Preservation Act, as described above in this document.

ADMINISTRATIVE REVIEW (OBJECTION) OPPORTUNITIES

This decision is not subject to objections pursuant to 36 CFR 218.

IMPLEMENTATION DATE

Trail construction is anticipated to begin Spring of 2021 and into 2022.

CONTACT

For additional information concerning this decision, contact: Matthew Paruolo, Eastern Sierra Sustainable Recreation Coordinator, phone number (760) 616-4054, or by email at; matthew.paruolo@usda.gov

Sincerely,

SIGNATURE

GORDON
MARTIN

Digitally signed by
GORDON MARTIN
Date: 2021.03.08
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GORDON P. MARTIN
DISTRICT RANGER

Date

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APPENDIX A



BEST MANAGEMENT PRACTICES, RESOURCE PROTECTION MEASURES AND DESIGN CRITERIA

Botany:

- All equipment will be free of mud and/or propagative plant parts prior to entering the project area.
- On-site native materials will be used for erosion control and user trail disguise and will not be collected in areas with invasive plants (e.g. cheatgrass, mullein, etc).
- Any seed or plugs used for revegetation of rehabilitated user trail segments will be native species locally collected on site.
- If any new populations of at-risk plants are discovered prior to or during implementation they will be reported to the FS botanist and avoided to the greatest extent possible.

Source: Engelhardt, Blake; Botanical Review for Lakes Basin Connector Trails project; Inyo National Forest; November 16, 2020

Wildlife:

- Removal of trees (living, dead, or dying) greater than 18 DBH requires site inspection by forest wildlife biologist.
- Cutting of trees, including hazard trees shall be left intact (not bucked up) on site to provide decaying habitat and contribute to down woody.
- Do not remove habitat with active nests, cavities or dens for any wildlife, and report all wildlife sightings including nests, cavities, or dens to the forest wildlife biologist.
- Prior to implementation and following implementation coordinate with forest wildlife biologist for annual monitoring of at-risk species.

Source: Torres, Thomas; Wildlife Report for Lakes Basin Connector Trails project; Inyo National Forest; January 6, 2021

Soil and Watershed:

The State and Regional Water Boards entered into an agreement with the U.S. Forest Service which requires the Forest Service to control non-point source discharges by implementing control actions certified by the State Board as Best Management Practices (BMPs). BMPs are designed to protect water quality including issues with sediment, turbidity, and water temperature (Table 1).

Table 1: The following BMP's are recommended for the project as applicable:

BMP	Description
PSW Region BMP 1-19: Stream course Protection	Provide for unobstructed passage of storm flows, control sediment and other pollutants from entering the stream course and restore the natural course of any stream as soon as practicable.



<p>PSW Region BMP 2-10: Parking and Staging Areas</p>	<p>Staging areas will occur on existing disturbed areas such as roads, the trail prism, or other areas where mineral soil exists with little vegetation, away from streams. No new ground disturbance will occur to create staging areas. Staging consists of crew equipment such as hand tools and personal gear. The staging areas will be located sufficient distance from water to prevent any effects to water quality (>100 feet).</p>
<p>PSW Region BMP 2-13: Erosion Control Plan</p>	<p>See project specific Erosion Control Plan that will be provided to project implementation staff.</p>
<p>PSW Region BMP 7-1: Watershed Restoration</p>	<p>Treatment areas may be temporarily closed to public use during the time crews are operating. When possible, trail traffic will be allowed to pass.</p>

Erosion Control Plan:

For new trail construction, trail re-routes, use trail rehabilitation and repair:

- Any temporary stockpiles of soil created by construction should be placed away from stream channels as practical so in the event of rain soil cannot be carried to the stream by runoff. Have tarps on hand of sufficient size to cover the stockpiles in the event of rain to prevent erosion, or place soil berms or fiber rolls around the perimeter of stockpiles.
- Construction work should cease in the event of rainfall or major increases in stream flow, or if the chance of rain is greater than 50%, to minimize potential impacts to water quality.
- Any remaining stockpiles of soil should be spread in locations away from stream channels as much as possible and later could be placed as tread or grade fill on eroded trail sections of trails within upland areas.
- Install applicable trail drainage/soil erosion control features to control water concentration on trails, i.e., dips, water bars, grade stabilizers (soil checks) armoring approaches to stream crossings, and adequate soil stabilization of abandoned or decommissioned trail sections (re-contouring, water bars, and natural mulch). The treatments should be consistent with trail construction standards and guidelines and are included in the project design. Oversight by a watershed specialist is recommended for design implementation of water control features and other trail designs concerning erosion control and water quality protection, or by an experienced trail design specialist is recommended.

Source: Shannon, Casey C.; Watershed Specialist Report for Lakes Basin Connector Trails Project; Inyo National Forest; January 20, 2021

Heritage Resources:

- Prior to the start of any trail construction work or contract award, the Town of Mammoth Lakes will coordinate with Inyo National Forest Heritage Program Manager (HPM) to ensure archaeological field review of staked trail locations, required photographic documentation, and any final adjustments to trail



alignments are completed as specified in the heritage consultation report.

- Upon completion of work outlined above, the Inyo National Forest HPM will notify the Town of Mammoth Lakes if cultural resource monitoring will be required during implementation for all or a portion of the construction activities. The Town of Mammoth Lakes will ensure required cultural resource monitoring is conducted and reported to the Forest.
- In the event that unanticipated discoveries are made during project implementation, all work in the vicinity shall cease, the discovery site protected, and the HPM immediately notified.

Source: Charlton-Grant and Beidl 2020; Inyo National Forest Heritage Report R2020050402443

Other Design Criteria:

- To minimize vehicle traffic and day-use parking on Upper Twin Road, the Town of Mammoth Lakes will install regulatory and wayfinding signage to direct users to appropriate day-use parking facilities. Current site conditions indicate that day-use visitors routinely park vehicles on Upper Twin Road to access the existing user-created (informally signed) access trail connecting Twin Lakes Campground to Twin Falls Overlook and the upper Lakes Basin. This Forest Service road is used by Recreation Residence owners to access the Twin Lakes Cabin Tract managed under special use permit with Inyo National Forest. Trail design and implementation of BMPs will avoid and mitigate impacts to watershed and Recreation Residence infrastructure upslope of the Twin Lakes Cabin Tract.
- To minimize potential conflict between equestrian and other multi-use non-motorized trail users, the Town of Mammoth Lakes will install etiquette and regulatory signage at intersections with approved equestrian pack-trails used by the Mammoth Pack Station and other equine users under special use permit with Inyo National Forest.

APPENDIX B

LAKES BASIN CONNECTOR TRAILS – PROJECT MAP

