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April 29, 2022

Lesley Yen
Forest Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Mammoth Main Lodge Redevelopment – Project Proposal Letter Submittal

Dear Supervisor Yen:

Subsequent to the Inyo National Forest’s (INF) acceptance of Mammoth Mountain Ski Area’s 2022 Master Development Plan (2022 MDP), Mammoth Main Lodge Redevelopment, LLC (“MMLR”, a wholly owned subsidiary of Mammoth Mountain Ski Area, LLC (“MMSA”)) and MMSA request the U.S. Forest Service initiate an environmental review of certain specific projects outlined in the 2022 MDP. The proposed projects are within the existing Special Use Permit (SUP) area, adjacent National Forest System (NFS) lands outside of the SUP area, and private lands that contain the existing base area.

In summary, MMLR proposes to improve the guest experience through projects within private Parcels A and B and connected actions within the existing MMSA SUP boundary. The proposed projects also include additional beginner terrain and lifts, which are not connected to the private parcel development. Background, purpose and need and a detailed description of the individual project components is included in Appendix A. Project locations are depicted in Project Proposal Figures 1-9. This description of projects is organized in a way that distinguishes projects that would occur on NFS lands and those that would occur on private land. We understand that actions on private lands will be subject to review under the California Environmental Quality Act (CEQA) and accordingly have copied the Town of Mammoth Lakes on this transmittal (refer to the Private Land Development section in Appendix A for private land project descriptions). We believe you will find that the organization of Appendix A facilitates easy review of these distinct but intertwined actions.

MMLR and MMSA greatly appreciate the efforts the INF has provided in the review and acceptance of MMSA’s 2022 MDP and looks forward to initiating this next step. Additionally, we appreciate the Town of Mammoth Lake’s involvement in this process and look forward to continuing our partnership through forthcoming NEPA and CEQA processes.

Supervisor Lesley Yen

April 29, 2022

Page 2 of 2

In addition to NEPA and CEQA, we also acknowledge that there may be separate authorization instruments (e.g., easements). In your reply to this letter, we would appreciate additional information on what these instruments may entail.

To facilitate this NEPA process, MMLR understands that the INF will require that we enter into a Cost Recovery Agreement to reimburse the INF for its time/expenditures throughout the process. As you know, we have retained the third-party NEPA contracting services of Ascent Environmental Inc. and SE Group to assist in the NEPA and CEQA processes and the preparation of the environmental analysis/documentation. We are available to provide additional information or details as may be helpful to your review.

Respectfully submitted,

Ron Cohen
President & COO
Mammoth Mountain Ski Area, LLC



Tom Hodges
Vice President
Mammoth Main Lodge Redevelopment, LLC

cc: Fred Wong, District Ranger, Mammoth Lakes Ranger District
Tyler Lee, Permit Administrator, Mammoth Lakes Ranger District
Janelle Walker, Region 5 Mountain Resorts Program Manager
Sandra Moberly, Community and Economic Director, Town of Mammoth Lakes

Appendix A



Introduction

This appendix includes helpful background information, the general purpose and need for the project, and detailed descriptions of the proposed project components. To facilitate both Forest Service and Town of Mammoth Lakes review of this information, we have structured this appendix in a way that describes projects with regard to their location on private or National Forest System (NFS) lands. Unless specified, all other information is pertinent to both parties.

Background

The private parcels involved in this project are those that were transferred out of federal ownership in the recently completed Mammoth Base Land Exchange. The exchange was completed in March 2020 and included an exchange of 35.7 acres of United States Forest Service (Forest Service) land for 1,213.2 acres of private land. This land exchange included two parcels of land, Parcel A (20.45 acres) and Parcel B (15.25 acres), which are located on what was previously an area of NFS land within the Mammoth Mountain Ski Area (MMSA) Special Use Permit (SUP) boundary. Parcels A and B are now private land owned by Mammoth Main Lodge Redevelopment, LLC (MMLR, a wholly-owned subsidiary of MMSA) as a result of the land exchange. These parcels contain existing parking lots, guest service facilities, lodging, and sewage treatment ponds and would be redeveloped as part of the currently proposed Main Lodge Redevelopment project. Refer to **Figure 1** for a depiction of existing land ownership boundaries and Forest Plan Management Areas.

The Land Exchange Environmental Impact Statement (EIS) states that the “redevelopment of the base area currently on Federal lands would be a Reasonably Foreseeable Future Action if the exchange were to be approved.”¹ The goals of the Mammoth Base Land Exchange were to improve administrative needs of MMSA and the Forest Service and to enhance the economic and community needs within Mammoth Lakes and Mono County, California. MMLR’s plan to develop parcels A and B as part of the Mammoth Main Lodge Redevelopment project aligns with the goals of the Land Exchange EIS by improving the visitor experience at MMSA (a visitor experience which heavily involves visits to National Forest lands), improving guest services and technical operations, and in turn offering economic benefits to MMSA, the Town of Mammoth Lakes, the Forest Service, and Mono County.

Purpose and Need

The [Land Management Plan for the Inyo National Forest](#) (Forest Plan) allocated the Mammoth SUP area as a *Destination Recreation Area*, a designation within *Sustainable Recreation Management Areas*. The theme of this management area states, “*Iconic destinations and well [known] attractions create a high demand for recreation experiences at specific locations [...] These places, along with the close proximity to other attractions, make these destinations highly desirable.*” Desired conditions for *Destination Recreation Areas* state that “*Available infrastructure and amenities are consistent with user capacity.*” Additionally, a large portion of land adjacent to the existing MMSA SUP area is designated *General Recreation Area* by the Forest Plan. The desired conditions for *General Recreation Areas* state, “*This area offers opportunities for expansion of recreational opportunities.*”

¹ https://opr.ca.gov/docs/NEPA_CEQA_Handbook_Feb2014.pdf

In accordance with the desired conditions of these management areas and their focus on meeting recreation demands, MMLR proposes to improve its recreational offerings with the proposed action, which includes an expansion of its SUP boundary into an existing *General Recreation Area*. The proposed action is consistent with all management direction provided by the Forest Plan within the existing SUP area and in the area of proposed development beyond the current SUP area.

The **purpose** of the proposed action is to enhance the guest experience of MMSA's day-use and overnight clientele.

The proposed action is **needed** to:

1. Renew and improve guest services, guest circulation, accommodations, and portal staging capacity in the Main Lodge Base area;
2. Expand guest services offerings to meet increased demands; and
3. Offer learning progression opportunities for lower ability level skiers through enhanced skier services, improved terrain, and additional lifts.

To meet these needs and best utilize the public and private lands within the Main Lodge Base area, key infrastructural changes are being proposed. These changes include roadway realignments, lift realignments, additional utility corridors, parking areas with improved access to lifts, a water tank with a gravity fed system to comply with building codes and provide fire suppression capabilities, and water storage facilities for snowmaking, irrigation, and fire prevention/suppression. These proposed changes are necessary to address aging infrastructure, meet anticipated recreation demands, and create the desired conditions for this management area. To best utilize lands in the base area, certain project components would be located on NFS land or relocated from private land to NFS land. These changes are intended to improve guest circulation, operational efficiencies, fire safety, and ski area access. All infrastructural changes are described in detail in the following paragraphs.

Federal and State Guidance

The proposed improvements in this document constitute a federal action, which has the potential to affect the quality of the human environment on public lands administered by the United States Forest Service (Forest Service). Therefore, these projects must be analyzed pursuant to the National Environmental Policy Act of 1969 (NEPA). Under NEPA, federal agencies must carefully consider environmental concerns in their decision-making processes and provide relevant information to the public for review and comment.

The California Environmental Quality Act (CEQA) is similar to NEPA in its intent and review process. CEQA applies to all California state, regional, or local agencies who propose a project that "may have a significant effect on the environment" (per Public Resources Code § 21082.2(a) & (d)).² CEQA does not apply to federal agencies. The projects described in this document that would occur on private land are subject to CEQA and are appropriate to be addressed in the Specific Plan through CEQA as well as in this EIS.

Lead NEPA and CEQA agencies have the authority to determine which level of environmental review is appropriate for a project. In some cases, a joint NEPA/CEQA process will be pursued if a project will clearly have one or more significant impacts. This document focuses primarily on the proposed projects on NFS land, however, because of the impacts of and relationship between the proposed projects on NFS lands and the proposed projects on private land, a joint NEPA/CEQA analysis is necessary for these

² <https://www.fs.usda.gov/project/?project=30428>

projects. The separate “Project Description” described in the CEQA Specific Plan provides more details of all improvements planned on parcels A and B. The projects proposed on private land and the specific project components that are considered *connected actions* with private land development are identified in the following sections.

Private Land Development

The Main Lodge area experiences a high volume of guests across all four seasons. It is a popular entry point onto the mountain and the surrounding public lands but in many cases has dated and limited infrastructure to support the influx of guests. MMLR plans to address these issues by developing Parcel A and Parcel B and providing redeveloped and additional lodging and guest services facilities. These facilities are needed to meet the anticipated guest demand at build-out. Refer to **Figures 8 and 9** for a depiction of existing and proposed conditions on the private parcels.

The existing buildings and parking lots within Parcel A would be replaced by improved lodging and skier service facilities and supporting infrastructure to create a cohesive base area village. The new configuration of Parcel A would remove the numerous existing architectural barriers and replace them with a seamless connection between a pedestrian plaza in the center of the village and the improved ski frontage (the “ski beach”) described in the *Projects on NFS Lands* section below. The existing wastewater treatment facilities within Parcel B would be reconfigured to accommodate the development of limited residential lots on the parcel as well as an upgraded wastewater treatment plant (WWTP) and up to 15 million gallons of on-site tertiary treated effluent storage to serve MMSA’s needs. The neighboring private chalets that currently exist under a separate Forest Service SUP unrelated to MMSA or MMLR would remain subject to the terms and conditions of their respective permits, but will be benefitted by the provision of upgraded utilities and access. This section provides a brief description of the projects proposed on the private parcels for context, however, as mentioned earlier, more detailed descriptions of the private parcel development projects will be included in the CEQA Specific Plan.

RESIDENTIAL

Plans for Parcel A development include eight buildings that would offer accommodations in addition to other services. At buildout, these facilities would accommodate up to 2,000 overnight guests in 482 planned lodging and residential units (refer to **Figure 8**). Additionally, Parcel B would be developed with 15 residential lots (refer to **Figure 9**). The lodging improvements on parcels A and B would increase the accommodation capacity in the Main Lodge area up to approximately 2,000 overnight guests from the existing 784 overnight guests, a maximum net increase of approximately 1,216 overnight guests.

COMMERCIAL

Commercial facilities are proposed in all buildings within Parcel A. Services in these facilities include mercantile retail outlets, a fitness and spa center, food and beverage, entertainment and event space, and an adventure center. Most skier services such as ticketing, ski school, and rentals would be located off of Parcel A in the Skier Services Building (SSB) on NFS lands, described under the *Projects on NFS Lands* section below. This configuration of commercial space with Parcel A and the location of the SSB would allow for an optimized arrival experience for day-guests and also meet the demands of overnight guests. Commercial activity for overnight guests would be centralized within Parcel A, while the SSB is located at the bottom of ski terrain, adjacent to the shuttle stop and short-term parking area (discussed in the following *Parking* and *Transit* sections), and on the eastern side of the base area for guests parking along

Highway 203. This would allow day-guests to easily access this building while also providing convenient access for overnight guests accessing the resort from the private parcels.

HIGHWAY 203 RELOCATION

In order to optimize vehicle flow, avoid congestion, and improve pedestrian safety, MMLR proposes to reroute Highway 203. The reroute would only move the section of the highway that passes along the southern boundary of Parcel A, which would be rerouted within the northern and western portions of Parcel A. The road would be a two-lane stretch of roadway with two 15-foot travel lanes and a 5-foot uphill bike lane. The proposed plan includes several access points into parking, residential, and lodging facilities on Parcel A. A shuttle stop and temporary parking area would also be constructed between Parcel A and the proposed skier services building within the existing SUP area. Additionally, MMLR proposes to construct a pedestrian walkway on the southern side of the road to provide safe pedestrian access into and around Parcel A. The realigned roadway would provide improved year-round access to the Mammoth Mountain Chalets SUP area as well.

This project would provide space for improved parking areas and shuttle stops along the road to improve skier and traffic circulation (refer to **Figure 5**). Additionally, it would allow for a portal between the ski beach and the main village area in the winter and summer seasons (refer to **Figure 8**). The realignment would greatly improve the arrival experience of guests while complimenting other projects that are intended to enhance the Main Lodge staging capacity. In order to construct and maintain the roadway, MMLR would collaborate with CalTrans, Town of Mammoth Lakes and the Forest Service. To facilitate this cooperation, MMLR anticipates that CalTrans and the Town of Mammoth Lakes will be engaged in the environmental review process as cooperating agencies. Further details on the technicalities regarding ownership and maintenance will be developed with stakeholder agreements as the NEPA/CEQA process continues.

ARRIVAL

Parking

Under the proposed development plan for parcels A and B, all of the existing private vehicle spaces on the private land parcels would be replaced by facilities and accommodations that are intended to improve the guest experience. Several new underground parking garages are proposed to provide parking for guests in the Main Lodge Base Area. Most of these spots are planned primarily to serve as spaces for overnight guests, but some may be available for day users and employees depending on usage patterns. Short-term and drop-off parking would also be provided immediately to the east of the newly proposed SSB described under the following *Projects on NFS Lands* section.

Additional parking facilities would support increased portal staging capacity, which accounts for private vehicle parking as well as transit, private vehicle drop-off, and skiers within walking distance.

Transit

As seen in **Figure 8**, there is an arrival plaza proposed on the eastern edge of Parcel A for short-term parking as well as transit and charter bus drop offs. Under this configuration, Charter buses could park at either Big Bend Parking Lot for the day or Parcel B as space may allow. This project would support additional employee and guest arrival capacity, reduce the potential for increased vehicle miles traveled, and would help to improve transit services at MMSA.

INDUSTRIAL USES

MMLR proposes the inclusion of the following industrial uses on Parcels A and B to help support the other proposed uses of the site. This includes: WWTP facility, Facilities Maintenance Shop, Sign Shop, Telecom Shop, Mercantile Distribution, Equipment Maintenance Garage, Fleet Fueling Station, Solid Waste Recycling Facility, and Laundry Facility. Facilities of these types currently exist in some form on Parcels A and B.

SUPPORTING INFRASTRUCTURE AND UTILITIES

The proposed projects on Parcels A and B would increase the demand for utilities such as sewage, electric, water, and communications. Plans for Parcel A include a new utility distribution sub-station to supply power to the proposed village and removal of existing propane tanks and lines to accommodate additional infrastructure and centralize the locations of tanks at MMSA. Refer to the *Projects on NFS Lands* section below for more information on these projects and the associated utilities proposed on NFS lands.

On Parcel B, existing wastewater treatment is accomplished through open retention and settlement ponds entirely located within the parcel. The proposed development projects would use Parcel B for residential development, while also creating a need for an upgraded WWTP in the area. MMLR proposes to reconfigure its existing WWTP within Parcel B to serve wastewater management needs within the private parcels and from facilities on NFS lands, including the SSB and mid-mountain lodges as well as the Mammoth Mountain Chalets.

The proposed on-site wastewater treatment, reclamation, storage, and reuse would use approximately 7 acres of land within Parcel B. Components of this project include on-site packaged wastewater treatment plant modules housed within a new building, pump stations, irrigation and equalization systems, disposal sites, odor and FOG control systems, a spray irrigation system, and an effluent storage reservoir (refer to **Figure 9**). Treated wastewater would then be reused for snowmaking and summer irrigation purposes, as described in the following sections.

Two ponds with a combined capacity of 15 million gallons are also planned on Parcel B for additional reclaimed water storage. As described in the following *Projects on NFS Lands* section, this water could be used for irrigation, snowmaking and wildfire fighting response purposes.

Connected Actions

The Council on Environmental Quality (CEQ) has regulations for implementing NEPA that require federal agencies to consider the following types of actions and impacts in an environmental document.³

Actions

1. *Connected Actions*: actions that are dependent on each other for their utility.
2. *Cumulative Actions*: actions which, when viewed with other proposed actions, have cumulatively significant impacts and should, therefore, be discussed in the same impact statement.

³ 40 CFR 1508.25

3. *Similar Actions*: actions which, when viewed with other reasonably foreseeable or proposed actions, have similarities that provide a basis for evaluating their environmental consequences together.

There are several projects within this proposal that would be considered *connected actions* with the private land development described above. These are projects that would not have utility without the development of projects on private parcels. Projects on NFS land that are connected to the development of parcels A and B are:

- Removal of the existing road and construction of the new road connecting parcels A and B
- Construction of a snowmobile crossing under the road connecting parcels A and B
- Modifications to and construction of utility lines serving both private parcels. This does not include the installation of the Propane tank farm, which would benefit other facilities at MMSA
- Construction of effluent discharge pipe from the WWTP to Dry Creek

Projects on NFS land that are connected to the development of Parcel A only and that would occur regardless of whether the development of Parcel B is approved:

- Modifications to and construction of utility lines serving Parcel A. This does not include the installation of the Propane tank farm, which would benefit other facilities at MMSA
- Installation of a gravity-fed water tank
- Construction of the Big Bend Parking Lot
- Construction of the Mountain Operations and Administration Headquarters
- Construction of the new Skier Services Building
- Relocating the bottom lift terminals of the Panorama Gondola and the Discovery Chair
- Development of beginner ski terrain adjacent to the new Skier Service Building down to the Big Bend Parking Lot, including the Big Bend Relayer Chairlift, Surface Platter Lift, and two moving carpet lifts.

Each project component is described in detail in the following sections.

Projects on NFS Lands

The following proposed projects would be located on existing NFS lands and are necessary in conjunction with the private land development described above to improve the guest experience, portal staging, and skier circulation in the Main Lodge area; accommodate more beginner skiers at ski school; and strengthen skier services and administrative operations at the resort.

ROAD CONNECTING PARCELS A AND B

In order to facilitate access to the water storage ponds, WWTP, and private residential parcels on Parcel B, MMLR proposes to build a new roadway connecting Parcel A and Parcel B. The existing service road in this area is a gravel-surfaced road that is steeper than the acceptable gradient for public roads. The existing road has an 18 percent grade. The new roadway would follow more gradual contours and would have a less steep gradient, generally 6 percent or less. It would be approximately 1,200 feet long and 100 feet wide, to allow for proper grading, drainage, and shoulder snow storage during the winter months. The road would be paved and designed for two 15-foot travel lanes with a 5-foot uphill bike lane and 1-foot downhill paved shoulder. As described in the following *Snowmobile Trails* section, the new roadway

construction would incorporate an underpass to facilitate continued operation of the existing USFS designated “F” snowmobile trail traversing the roadway line. Construction of this road would require vegetation clearing as well as grading in this approximately 3-acre area of disturbance. The existing gravel service road would be removed following construction of the new roadway, and relevant proposed utilities including snowmaking described in the following *Underground Utilities* section would be placed in the road corridor during the construction process.

MMLR requests a permanent easement and requests authorization for the Proposed Road Access from the Forest Service. The permanent easement would authorize MMLR to construct a road to accommodate permanent, year-round, motorized, vehicular road access (the “Proposed Road Access”) to Parcel B surrounded by NFS lands managed by the Inyo National Forest. MMLR submits that its proposed use of the Property (residential and lodging area) constitutes a reasonable use and enjoyment of the Property and the Proposed Road Access route is the only route that facilitates such reasonable use and enjoyment. In reply to this proposal, MMLR requests that the Forest Service provide further details on how this road may be permitted either consistent with the mechanisms described in this paragraph or otherwise.

TRAILS

Snowmobile Trails

The existing snowmobile trails are routed between parcels A and B and are designated Trail “F” of the USFS designated snowmobile trail system. The proposed road connection between parcels A and B would intersect the existing snowmobile trails. To accommodate the trails, MMLR proposes to construct an underpass for safe snowmobile crossing.

Pedestrian Paths

To create a connection between parcels A and B, pedestrian paths are proposed. These natural surface paths would tie into the existing trail network and benefit the public by improving connectivity between Parcel B and the rest of the mountain during snow-free months. The construction of designated pathways in this area is also intended to prevent user-created trails on NFS lands. An easement or similar agreement would be necessary for the development of these pedestrian connections.

Additionally, a raised, paved sidewalk with curb and gutter that is approximately 8-feet in width is proposed along the uphill side of the roadway connecting parcels A and B to facilitate safe year-round pedestrian access between Parcel A and Parcel B.

NEW LIFTS, LIFT REPLACEMENTS AND RELOCATIONS

Magic Carpets

MMSA proposes to construct two magic carpets (surface conveyor lifts) in the Gus’s Pasture area, directly northeast of the existing Main Lodge (refer to **Figure 5**). One carpet, MC1, would be 100 feet long and would have a lower slope angle for first-time skiers. The other carpet, MC2, would be 300 feet long and would have slopes with 10 percent grade to aid skier progression. This would enable skiers to start their lessons at MC1 and eventually progress to MC2, further promoting the overall suite of beginner learning opportunities in and around the base area. An extension of existing underground power lines would be required to power these magic carpets.

Currently, one magic carpet exists near the bottom of the Lower Panorama Gondola terminal. It serves skiers from the Main Lodge Base Area and Lifts 2/10 and experiences high ridership. Beginners then

progress to the Discovery Chair, which provides most of the beginner terrain on the mountain. The proposed magic carpets would supplement the existing beginner terrain under the Discovery Chair and would support a more gradual skier progression. These lifts would also support higher volumes of guests that would result from other proposed Main Lodge projects. Their location would become the primary teaching area for ski school, called Gus's Pasture, and would be adjacent to the proposed ski school building, SSB3. More information about SSB3 is discussed in the following *Facilities* section.

These magic carpet projects are independent of the Private Land Development, as they would serve the MMSA guest experience, and more specifically the purpose of offering learning progression opportunities for lower ability level skiers, with or without the base area redevelopment.

Lift 37 Surface Platter

Proposed Lift 37 would also be located in Gus's Pasture and would be accessible from each of the proposed magic carpets. MMSA proposes this lift to support the learning progression within the Gus's Pasture teaching area. The lift would be a surface platter lift 500 feet in length and would provide access to slopes of 12 percent grade. After skiers progress from MC1 to MC2, they would be able to take the platter lift to continue their learning progression. An extension of existing underground electric lines near the base area would be required to supply electricity for this lift as well.

This lift project is independent of the Private Land Development, as it would serve the MMSA guest experience, and more specifically the purpose of offering learning progression opportunities for lower ability level skiers, with or without the base area redevelopment.

Big Bend Relayer Lift

MMSA proposes to install a new detachable four-person lift, the Big Bend Relayer or Lift 36, from the base of Gus's Pasture to the intersection of *Jill's Run* and *St. Moritz* trails. It would be approximately 1,100 feet in length and would provide direct access from the proposed Big Bend Parking Area and Mountain Operations and Administrations Headquarters to the Main Village Base Area for better skier circulation and access to and from these key staging portals. It would also service skiers using new beginner terrain, as described in greater detail below. The arrival experience and staging capacity of the proposed Big Bend Parking Area is further discussed under the following Terrain and Infrastructure heading. This lift would also receive electricity from an extension of the existing lines near the base area. The proposed lift alignment would require an approximately 40-foot-wide tree-cleared corridor and some associated grading work at the bottom and top terminals.

Existing Lift 11 Discovery Chair

The existing Discovery Chair (Lift 11) is 1,975 feet long and has a design capacity of 2,400 people per hour. It was built in 1999. It is one of the most heavily used lifts at the resort because it provides access to beginner terrain for ski school and beginner skiers. The existing bottom terminal and one lift tower are currently within Parcel A.

In order to best utilize the private land configuration, MMSA proposes to shorten the lift by moving the bottom terminal 350 feet southwest within the current alignment. This change will open up space for additional guest service facilities on private lands and help provide an enhanced arrival and accommodation experience when coupled with other private lands projects. Further, the proposed location of bottom terminal will ensure that skier circulation within the base area is not compromised.

The bottom lift terminal would be relocated within the existing MMSA SUP boundary. The shortened lift would be approximately 1,600 feet long and the lift capacity would remain at 2,400 people per hour. Construction would require approximately 20,000 yards of cubic cut and approximately 27,000 yards of cubic fill and would occur on previously disturbed lands near the base area. Existing underground electric lines that currently supply power to the lift will be rerouted to provide electricity to the proposed bottom terminal location.

Panorama Gondola

The existing Panorama Gondola is approximately 3,645 feet long and has a design capacity of 2,400 persons per hour. It was built in 1999. Similar to the existing Discovery Chair, the bottom terminal of the Panorama Gondola is currently located on private land. MMSA proposes to move the bottom terminal approximately 200 feet south into the existing SUP area. Similar to the Discovery Chair project described under the previous heading, this change will open up space for additional guest service facilities on private lands and help provide an enhanced arrival and accommodation experience when coupled with other private lands projects. Further, the proposed location of bottom terminal will ensure that skier circulation within the base area is not compromised.

In addition to moving the bottom terminal of the Lower Panorama Gondola, MMSA proposes to replace both stages of the Panorama Gondola with a higher-capacity 10-passenger detachable gondola. The Panorama Gondola is one of the most popular lifts at MMSA in the summer and winter and is reaching the end of its operational life. This replacement would address both capacity and aging infrastructure needs. The proposed gondola would be aligned immediately east of the existing gondola and would include terminal building additions to both the McCoy Station mid-gondola station and the Top Panorama Gondola building. This gondola would have a design capacity of 3,000 pph and would increase the combined capacity of both gondola stages by 390 guests per day.

Similar to the Discovery Chair, underground electricity would be rerouted from the existing line that currently powers the lift. Lift installation efforts would require grading in the areas for the proposed terminals and tree removal along the proposed lift alignment. The new lift would be installed parallel to the existing lift so that the existing lift can stay in operation through construction, as it is an essential component of both winter and summer recreation at MMSA. The existing lift would be removed after the installation of the new lift and grading would be required to create smooth surfaces in place of terminals and towers. The bottom terminal footprint would be remediated as a component of Base Area redevelopment that would occur on private lands.

TERRAIN AND INFRASTRUCTURE

Expanding terrain and infrastructure is critical to MMSA's operations over the next decade. The development of additional terrain and infrastructure would help MMSA provide an enhanced guest experience by creating better skier circulation and connectivity between key areas of the SUP area. Additionally, parking related improvements discussed in this section are intended to improve the arrival experience by creating an additional employee parking lot in the Big Bend area to ensure operational capability and improve the employee experience.

Terrain Development

MMSA proposes to construct approximately 8 acres of new ski trails within the existing SUP area, including approximately 2 acres of trail connections between the Big Bend Parking Area and Lifts 2 and 10. The ski trails would provide additional beginner terrain at the base of the mountain in the Gus's

Pasture area and facilitate connections between the proposed Big Bend parking area and the rest of the mountain. Construction of these trails would require clearing and associated grading within the proposed area.

More specifically, the proposed ski trails within the SUP area include four new beginner trails providing additional Ski School terrain and connecting existing trails to the Big Bend Parking Area to provide egress back to the proposed parking area. The projects are depicted in **Figures 3 and 5**.

Ski Beach Improvements

The ski beach is a relatively flat area between the Main Lodge and lifts. It experiences heavy ski traffic as well as congestion from guests milling and staging throughout the day. The area currently extends 60 feet between the existing Main Lodge building and Broadway Express and has only a small area where skiers can enter the mountain to access lifts, causing issues with skier access and circulation. With the previously-approved replacement of Broadway Express, proposed shortening of the Discovery Chair, proposed upgrade of the Panorama Gondola, and the proposed reconstruction of the Main Lodge, the ski beach would have a snow front of over 1,530 feet and the area would have approximately 165 feet between the snow front and the Broadway Express terminal. This would provide better access for skiers from the main village onto the mountain and would create more space for skiers to gather as they begin and end their day on the mountain, directly improving skier circulation and staging capabilities. The snow front would be on the perimeter of the village plaza, creating a portal between the mountain and the village and the transit hub. Minimal grading would be required to create a comfortable slope in the ski beach.

Snowmaking

Snowmaking is proposed along the improved ski beach, magic carpets and platter, and on the proposed ski trails near the Big Bend Relayer lift. In total, this would amount to approximately 9 acres of new snowmaking coverage. Snowmaking would provide better snow surface and early season conditions for skiers and on the ski beach area. By improving the snow surface, skier circulation and the guest arrival experience would benefit.

Expanding the snowmaking in these areas would use all existing snowmaking infrastructure but would require the installation of additional snowmaking pipes (see **Figure 7**). Five additional lines would be installed as extensions of the existing pipe system. Each pipe would be buried at a depth of approximately five feet and would have a 40-foot disturbance corridor. This additional coverage could be accommodated by MMSA's existing wells and those that were previously approved in the 2019 Environmental Assessment, which are anticipated to be constructed by the 2023/24 season.

In addition to expanding its snowmaking coverage, MMSA proposes to route reclaimed wastewater from the WWTP in Parcel B, along the proposed roadway connecting parcels A and B, and to the existing mid-mountain snowmaking reservoir by McCoy Station via a 12-inch pipeline. This would provide additional water for snowmaking and summer irrigation and would make use of recycled water generated by the WWTP. It is anticipated that tertiary treated reclaimed wastewater will significantly reduce the overall use of fresh groundwater for snowmaking (and for irrigation).

Parking

Current parking facilities at the Main Lodge Base Area accommodate up to 270 cars and 30 buses. In order to accommodate the increased guest capacity anticipated by the proposed Main Lodge Base Area

improvements and improve employee access to the resort, a new parking lot, the Big Bend Parking Area, is proposed to be constructed on NFS land. The parking lot would contain approximately 360 stalls and would be located on the southern side of Highway 203 between the Main Lodge Base Area and the Chair 2 Base Area. This area would not offer guest services but would likely have a public restroom for guests parking here. The new lot would primarily be utilized by employees starting their shifts in the proposed Mountain Operations and Administration Headquarters building described under the *Facilities* section below and would have dedicated parking for employees on an as-needed basis. By providing more spaces for employees, they would no longer need to utilize the existing guest parking along Highway 203 between the Chair 2 base and the Main Lodge Base Area. This would ultimately improve the guest experience at the Main Lodge staging portal by leaving more parking spots available for guests and would significantly improve the employee experience by locating employee parking in an area adjacent to their dedicated facilities. A consolidated employee parking area will also enhance operational efficiency on snow days/nights, allowing planned use of parking in a manner coordinated to permit 24-hour snow removal operations. MMSA acknowledges that the existing Uptown and Downtown mountain bike trails would be displaced and relocated to immediately adjacent forested areas to accommodate the planned Big Bend Parking Area.

Utilities

MMSA and MMLR propose to upgrade existing utilities in order to serve a higher capacity of guests. Refer to **Figure 6** for a depiction of existing and proposed utility lines. Specific utilities are discussed in greater detail in the following sections.

Propane

The Franchise system that AmeriGas operates in the Town of Mammoth Lakes is in need of additional storage. The system has limited private property available to house additional storage in a safe location for access by bulk propane transport trucks. Instead of expanding in the area of the existing system, MMLR and MMSA are collaborating with AmeriGas to propose a joint project to install a new propane tank farm. This would address the expansion needs of the community, the Town, and the Forest Service and would serve the proposed Main Lodge Base Area as well.

The proposed propane tank farm would be located adjacent to the existing MMSA Maintenance Garage facility. There currently exists a 20,000-gallon tank that services both the garage and Canyon Lodge. This existing tank would be removed and replaced with underground tanks with a storage capacity of up to 180,000 gallons at the new proposed tank farm location, immediately west of the existing maintenance garage driveway entrance, to serve the ultimate load of the Main Lodge Redevelopment and support and reinforce supply to the existing community service. Centralizing the propane network in this way would allow for tanks at the bulk storage at Mammoth Mountain Inn in the Main Lodge Base Area (see **Figure 6**), at the Mill, and in other locations to be removed and eliminated. Consolidation of storage would also provide public safety benefits particularly during wildfire season and reduce the number of resources needed to maintain the facility properly as it is a central location for mountain operations. Lastly, this project would prepare MMSA and the community for extended storm events by providing more storage capacity to serve the system and its customers (e.g., if a supply truck can't access the site there is greater inventory to use during storm events between resupply).

To serve the Main Lodge Base Area, MMLR proposes to extend existing propane lines towards Parcel B, demolish the existing propane tank and lines in the Main Lodge area, and connect Parcel A with the proposed propane tank farm via a trench alignment along existing dirt service roads between Main Lodge

and the Maintenance Garage as depicted in **Figure 6**. To connect the proposed tank farm to the existing Town Facilities near The Village, MMLR proposes to install a pipeline that runs from the proposed Maintenance Garage tank farm along the alignment of the existing Village Ski Back Trail thereby avoiding any tree removal. The line would be buried three feet deep along an approximately 2.4 mile-long corridor with a 40-foot wide disturbance along the line. As discussed above, the line serving the Main Lodge Base Area is considered a connected action with parcel A and B development. Additionally, a short connector pipeline between the existing MMSA propane main servicing Canyon Lodge would be connected to the existing community main in the Canyon Lodge parking lot by way of a new trench line adjacent to the bottom terminal of Chairlift 7. If the development on private land does not occur, the line would be approximately 1.1 miles from the Chair 2 base area to the propane tank farm.

Communications

The Main Lodge Base Area has several communications lines which include both fiber optic and copper telephone lines collectively serving ski area operations and guest accommodations. New lines would be required to connect the proposed development projects to these existing lines. MMLR proposes to install a new line on NFS lands parallel to the proposed propane line from The Village as noted above which would provide improved service to the Main Lodge Base area.

Water

There are currently several underground water lines serving the Main Lodge Base area at MMSA. These lines are predicted to be adequate to serve the proposed projects on the SUP, however, the proposed projects on parcels A and B would require a separate storage tank. The 2022 MDP determined that proposed projects on parcels A and B and Skier Services Buildings on NFS lands would require a minimum 686,000-gallon storage tank to meet Average Daily Demand (ADD) and fire flows to comply with California Fire Code.

In order to meet the additional domestic water storage needs of the proposed projects, MMLR proposes to construct a gravity fed water tank system. A gravity fed system would be more reliable than a pressurized system as it would not require pressure pumps or additional electricity. The closest location for the tank to provide adequate pressure for the flows anticipated for the Main Lodge base development would be near the top of the Discovery Chair, on NFS land (refer to **Figure 6**). The location would be approximately 500 feet northwest of the lift's top terminal in a forested area between two existing ski trails on NFS land. This location is at an elevation of 9,080 feet and would provide 75 psi pressure to the Main Lodge base area. The reservoir would be an above-ground Superior bolted or welded steel reservoir 16 feet tall and 95 feet in diameter. The tank would be painted to blend in with the surrounding forest canopy in the area in accordance with the approved Inyo National Forest prescribed Color Palette. The plan would also include an approximately 1,800-foot-long pipe trench for both tank fill and gravity flow pipelines back to the Main Lodge base routed along the Apple Pie ski run and towards the base of the Discovery Chair. Installation of the water storage tank and associated water mains would create approximately 2 acres of disturbance.

Wastewater Management

As mentioned previously, MMLR proposes to reconfigure and upgrade its WWTP on Parcel B as part of the Main Lodge Redevelopment. The new WWTP is contemplated to produce tertiary treated water which could be utilized for both snowmaking and irrigation purposes on NFS lands. Further, in addition to proposed sewage lines, a reclaimed water line is proposed along the road between parcels A and B to

route reclaimed wastewater from the WWTP into the snowmaking reservoir at mid-mountain for winter snowmaking and summer irrigation purposes (refer to **Figure 6**). Also, 15 million gallons of combined reclaimed wastewater effluent storage is planned on Parcel B to bolster overall snowmaking capacity of MMSA. Finally, in the event storage capacities are reached on both Parcel B and at the mid-mountain snowmaking reservoir, the WWTP would discharge tertiary treated effluent to surface flows of Dry Creek on NFS lands on an as needed basis. The discharge point to Dry Creek would require the burial of approximately 75 feet of pipe on NFS lands from the private land boundary. The pipe and discharge point locations would allow tertiary treated effluent to gravity flow to Dry Creek.

Electricity

The Main Lodge Base Area is the site of four electric lines serving its lifts and facilities. As described in the previous sections, several proposed lifts would require an extension of existing lines or new dedicated underground power lines. These projects include Lift 37, the proposed magic carpets, snowmaking, and the private land development in the Main Base area. The proposed Main Lodge Base Area would also most likely require a new substation and reticulation to supply power to parcels A and B, as described above. This would be located within Parcel A and would serve the private land development projects as well as service loads from elsewhere in MMSA. Proposed power lines would be installed on NFS lands underground and along roads when possible, including under the proposed road connecting parcels A and B.

Geothermal

MMLR is currently researching the viability of developing a geothermal heat source within the boundaries of parcels A and B for purposes of both building heating and snowmelt systems, as well as a heat source for domestic water uses.

FACILITIES

Within the SUP boundary, MMSA proposes to create three skier services facilities and one Mountain Operations and Administration Headquarters facility to better support guests and MMSA operations. Employee housing would also be developed offsite to support additional employee capacity, however, these would not be built on NFS lands.

Skier Services

In addition to buildings proposed on private land, MMSA proposes to construct a new Skier Services Building (SSB) on NFS land to replace the existing Main Lodge and operations. The proposed building has been designed by Hart Howerton to serve a variety of skier services purposes. The building would have a total area of approximately 88,500 square feet and would be sectioned into three distinct areas, SSB1, SSB2, and SSB3. The building would be adjacent to the proposed magic carpets and ski beach area, directly northeast of the existing Main Lodge (see **Figure 5**). SSB1 would primarily offer food and beverage services and would also be the site of public lockers. SSB2 would be three stories and would include rentals, food and beverage space, and ski school facilities. SSB3 would have facilities for parking and loading, administrative services, executive and coach offices, disabled sports, and the ski team. The building would be three stories and would be accessible from the village plaza and from the snow so that ski school can easily access lifts and terrain. All skier services buildings would be designed to meet Forest Service Built Environment Image Guide standards. This will ensure that materials and surfaces blend with the natural surroundings and are consistent with other components of the built environment at MMSA. These buildings would also be ADA accessible.

MMSA intends to construct this new skier services building in an effort to upgrade the existing 162,036 square feet of base area facilities in the Main Lodge, Mammoth Mountain Inn, Woollywood Ski School, Yodler Restaurant, and the slope-side Ski Team headquarters to more modern and efficient buildings. Some of these services would remain on Forest Service land in the proposed skier services building and some would be moved onto the private land into the proposed commercial services buildings on Parcel A. In total, the skier services building would create approximately 88,500 square feet of guest service area on NFS land. The proposed building would disperse skiers and improve guest satisfaction by consolidating guest services, increasing restaurant seats and locker space, and dedicating more space to ski school and operations, thus providing more efficient MMSA services.

Mountain Operations and Administration Headquarters

MMSA proposes constructing a Mountain Operations and Administration Headquarters building adjacent to the proposed Big Bend Parking Area that would be dedicated to mountain operations and administration. This building would follow Forest Service Built Environment Image Guide standards to ensure that materials and surfaces blend with the natural surroundings and are consistent with other components of the built environment at MMSA. The building will be ADA accessible. This would be a three-story building with a height of approximately 45 feet. The footprint would be approximately 8,000 square feet and total interior space for the three stories would be 24,000 square feet. Employees would be able to park in the proposed Big Bend Parking Area or take public transit to access the building. Water and electricity would be supplied via existing lines between the Main Lodge Base Area and Chair 2 base. Wastewater, propane, and optic fiber lines would be supplied via proposed lines between the Town and the Main Lodge Base Area as previously described.

SUMMER ACTIVITIES

In an effort to create an integrated and holistic summer experience, developed summer activities such as mountain coasters, zip lines, and ropes courses would be located at Woolly's Adventure Summit rather than at the Main Lodge Base Area. These activities have been previously analyzed and approved in a separate NEPA process. In addition to these activities, MMSA intends to focus on improving passive summer activities in the Main Lodge Base Area. Passive activities in the area include scenic gondola rides, transit hub activity of the Reds Meadow/Devils Postpile shuttle bus service, and access to the mountain bike park and hiking trails.

The proposed Main Lodge redevelopment projects would also require existing summer operations to be slightly adjusted due to grading and construction processes. To accommodate the Parcel A development, MMLR would relocate the existing EuroBungy trampoline and upgrade the existing climbing wall. Existing mountain biking and hiking trails on NFS lands that terminate in the Main Lodge Base Area would also be shortened or rerouted to accommodate the proposed Parcel A development.

DEFENSIBLE SPACE AND FIRE PROTECTION

Catastrophic wildfire events are becoming increasingly common and pose a risk to developed areas across the U.S., including many ski resorts. Due to the high risk of wildfire occurring within forested lands throughout California in particular, MMLR proposes to implement best contemporary forestry practices. This includes reducing the forest fuel load in and around the project area to mitigate the risk of catastrophic wildfire. This would provide protection to MMSA guests and staff as well as to MMSA's valuable infrastructure, particularly if the proposed projects are constructed.

Defensible space would be created in and around parcels A and B to enhance the safety of the wildland-urban interface (WUI). MMLR proposes defensible space strategies such as shaded fuel breaks and mechanical/hand thinning units along all roads and between proposed infrastructure. Shaded fuel breaks strategically within specific area(s) for the strict objective of reducing, modifying, and managing fuels within designated areas in order to enhance mitigation efforts in the event of a wildland fire situation. A shaded fuel break does not remove all vegetation in a given area, but rather intensively thins existing trees and removes the bulk of the surface fuels, such that fire cannot spread vertically or horizontally within the treatment area. Where infrastructure does not occur, treatment units will be established by analyzing forested areas most at risk to wildfire. These defensible space strategies not only create more resilient forests but also ensure access and egress is protected in the event a wildfire would occur. MMLR would approach these projects by coordinating with forestry professionals and local fire agencies familiar with the specific site conditions. Known evacuation routes, population density, and other site-specific factors are important considerations to determine the most appropriate way to achieve the project's goals.

Additionally, the proposed configuration of Parcel B includes two water ponds. These proposed water storage areas would benefit MMSA by providing up to an additional 15 million gallons of water for wildfire fighting response. This water could be used by responding wildfire agencies and could also be distributed through MMSA's mountain-wide snowmaking system, potentially providing substantial protection for the ski area and the Town in the event of a prevailing wind wildfire approaching from the west.

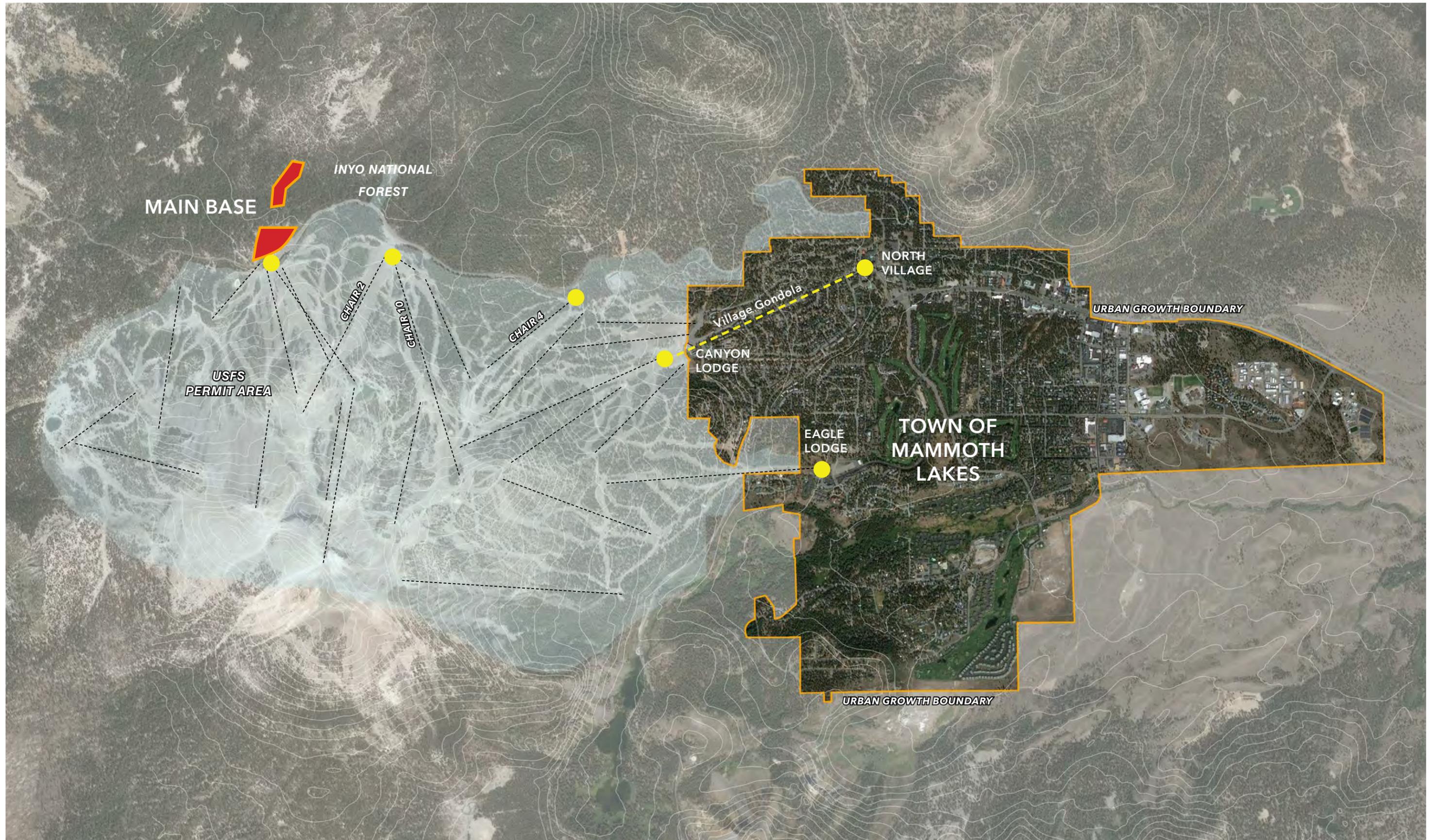


Figure 2 - Town Context

Mammoth Main Base October 17, 2022

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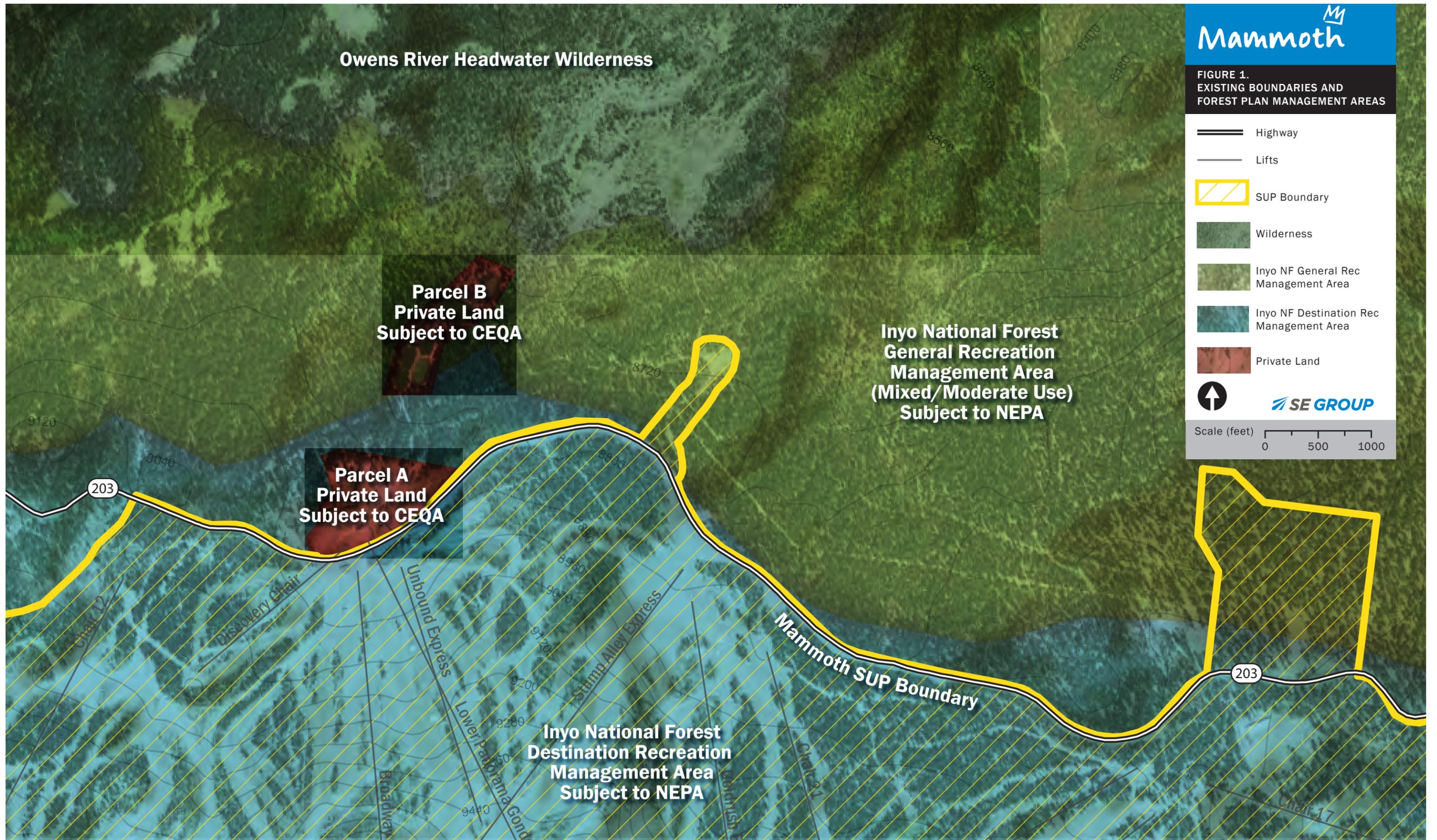


Figure 3 - Ownership



Figure 4 - Existing Conditions

Legend	
-----	Main Base Parcel Boundary
A	Main Base
B	Resort Residential
C	Reclaimed Water Storage Pond
D	Wastewater Treatment & Facilities
USFS Permit Area	
1	New Road Connection
2	Ski Beach
3	Gus' Pasture Training Terrain
4	Proposed Ski Run
5	Existing Chalets
6	Transit & Arrival Plaza
7	Mountain Operations
8	Employee Parking
—	Existing Chair
—	Proposed Gondola or Chair



NOTE: CONCEPT PLAN IS FOR ILLUSTRATIVE PURPOSES ONLY.

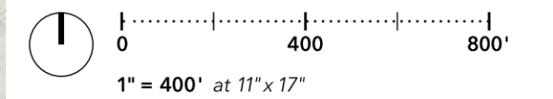


Figure 7 - Illustrative Concept Plan



Figure 10 - Parcel A Illustrative Concept Plan

Legend	
-----	MMSA Parcel Boundary
A	Resort Residential
B	Wastewater Treatment & Facilities
C	Reclaimed Water Storage Ponds



Figure 15 - Parcel B Illustrative Concept Plan

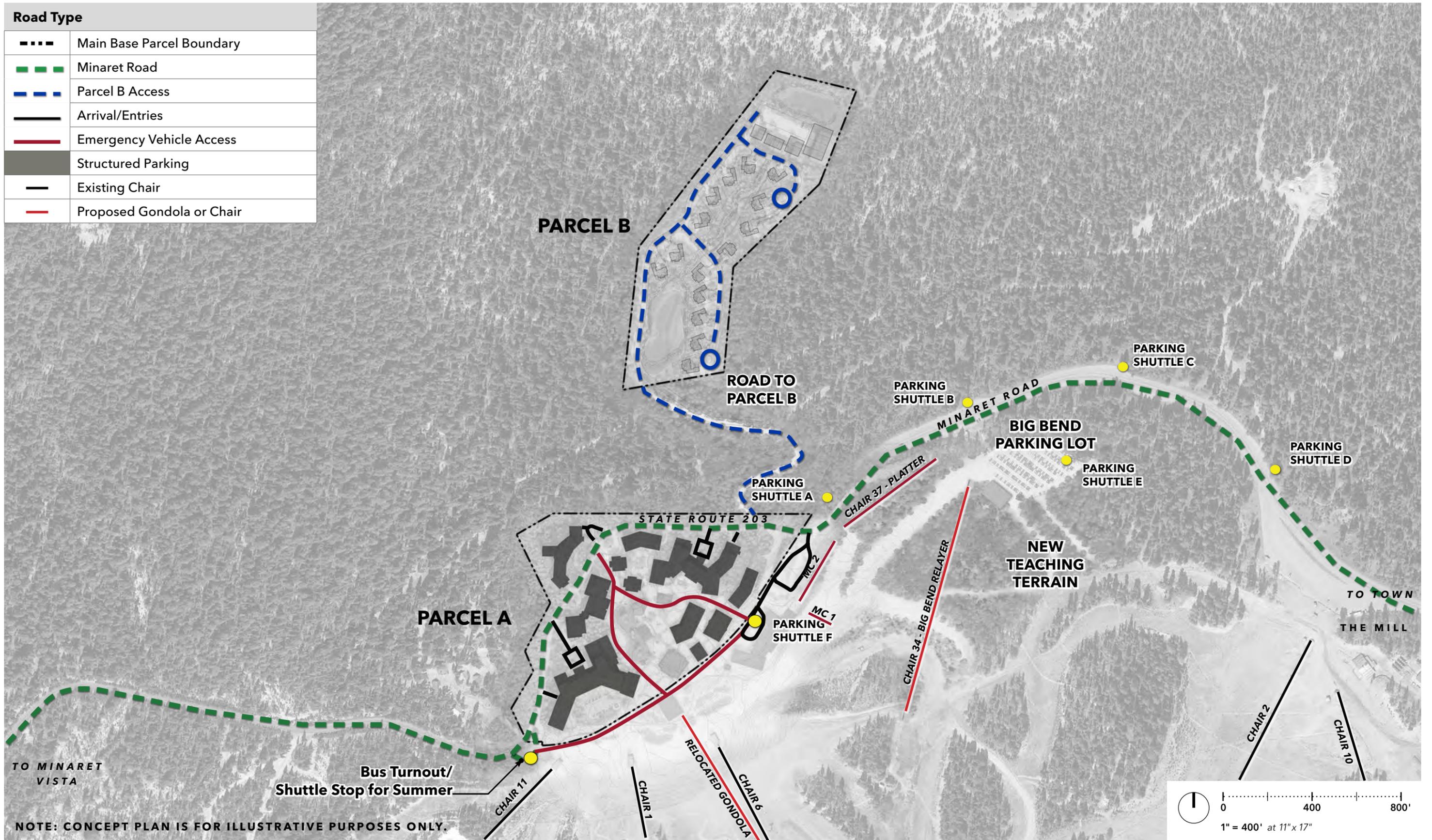


Figure 17 - Circulation

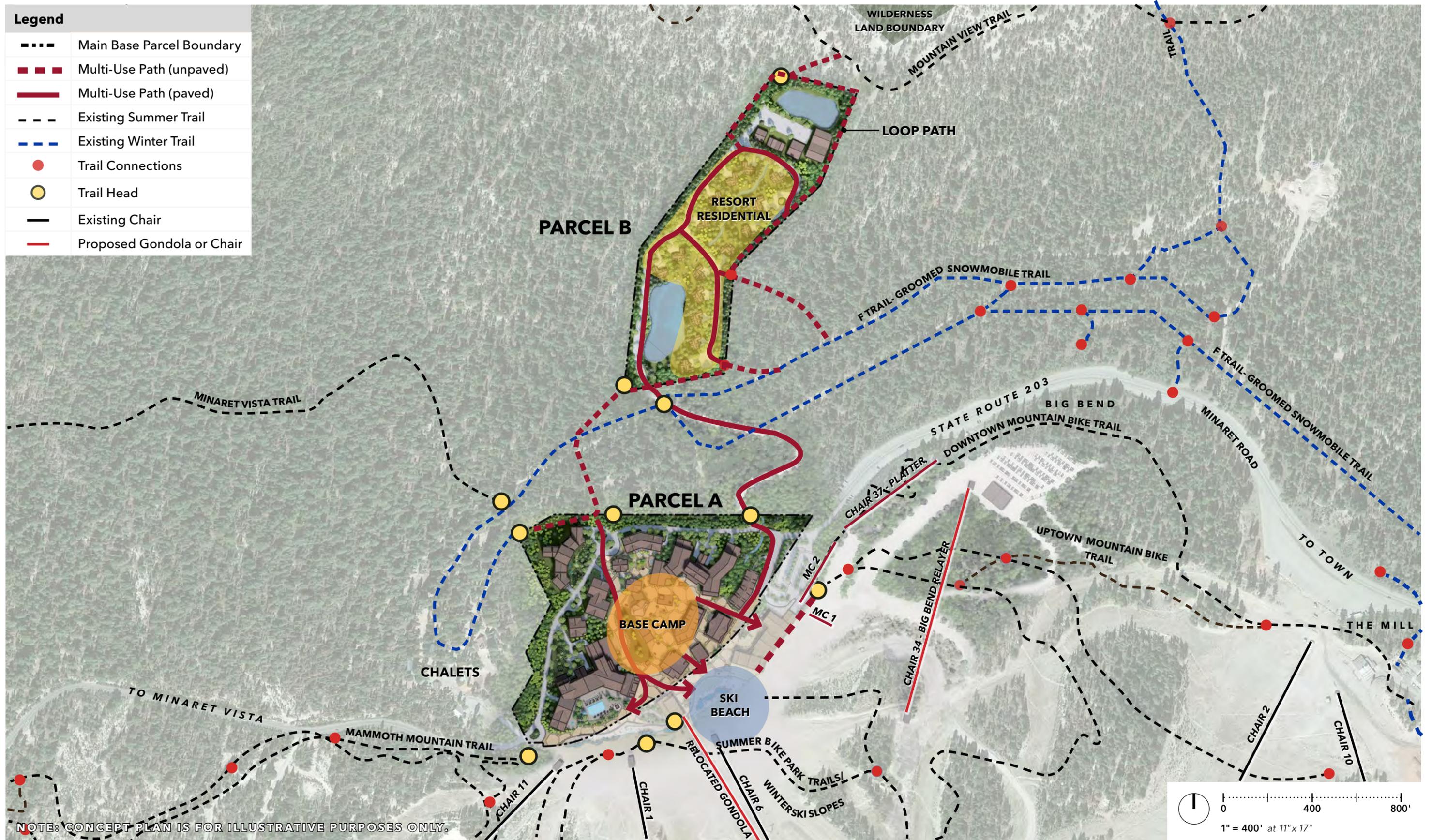


Figure 21 - Open Space and Trail Network

FIGURE 5. PROPOSED MAIN LODGE BASE AREA (WINTER)

EXISTING	PROPOSED
SUP Boundary	Highway
Snowmobile Trail	Road
Lifts	Trails
Streams	Trail Centerlines
USFS Permit Cabins	Buildings
SE GROUP	Parking
	Water Bodies
	Proposed Lift
	Lift Upgrades
	Previously Approved Lift

Scale (feet)
0 250 500

RECLAIMED WATER PLANT

RECLAIMED WATER DISCHARGE POINT

RESIDENTIAL LOTS

SNOWMOBILE UNDERPASS

203

Lift 37/Platter

BIG BEND PARKING AREA

MOUNTAIN OPERATIONS AND ADMIN HEADQUARTERS

RESIDENTIAL

USFS PERMIT CABINS

RESIDENTIAL

HOTEL

VILLAGE CORE

SHORT-TERM PARKING

MC2

MC1

SKIER SERVICES BUILDING

1

2

3

GUS'S PASTURE

Lower Panorama Gondola

Big Bend Relay

Discovery Chair

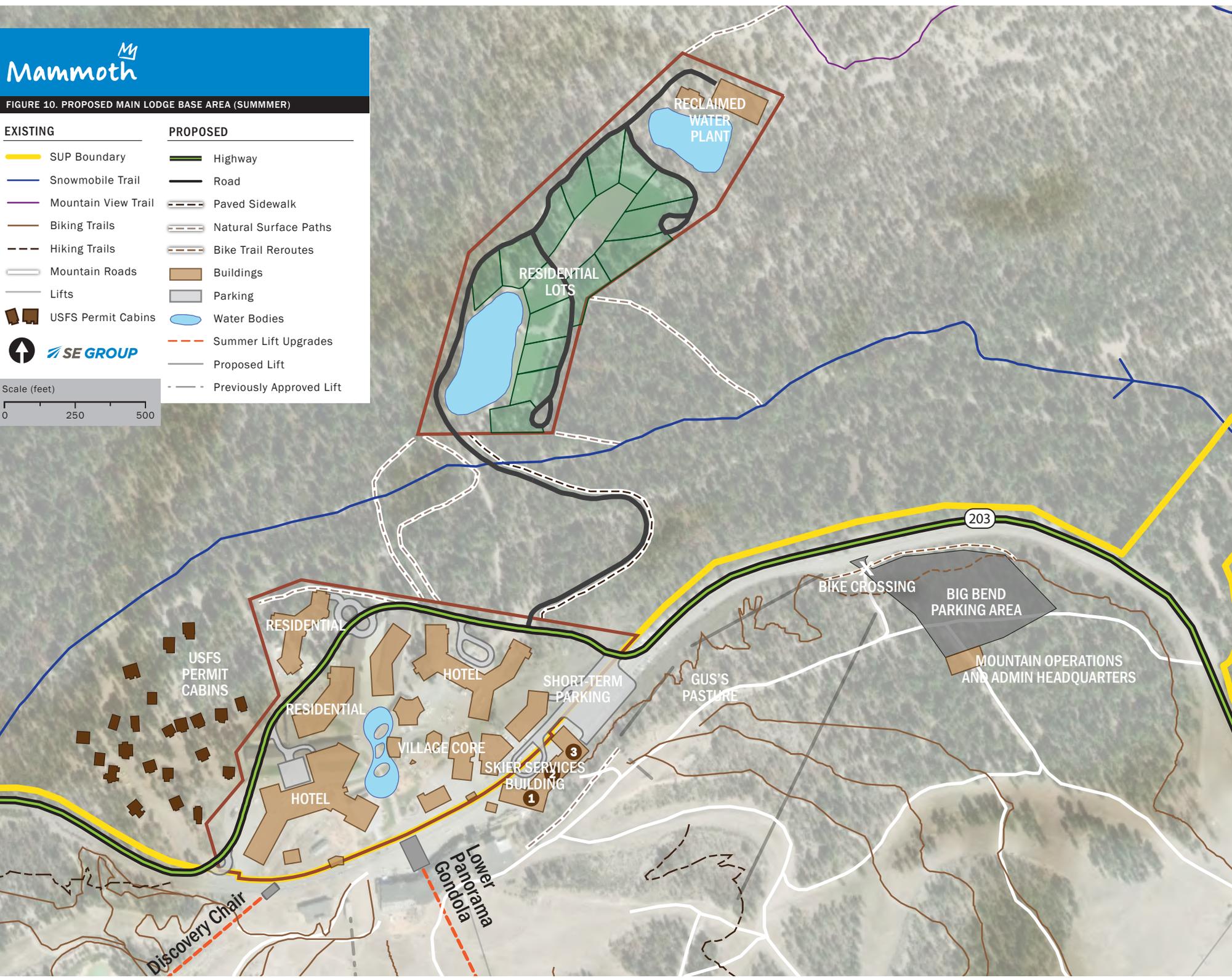
Broadway Express

Unbound Express

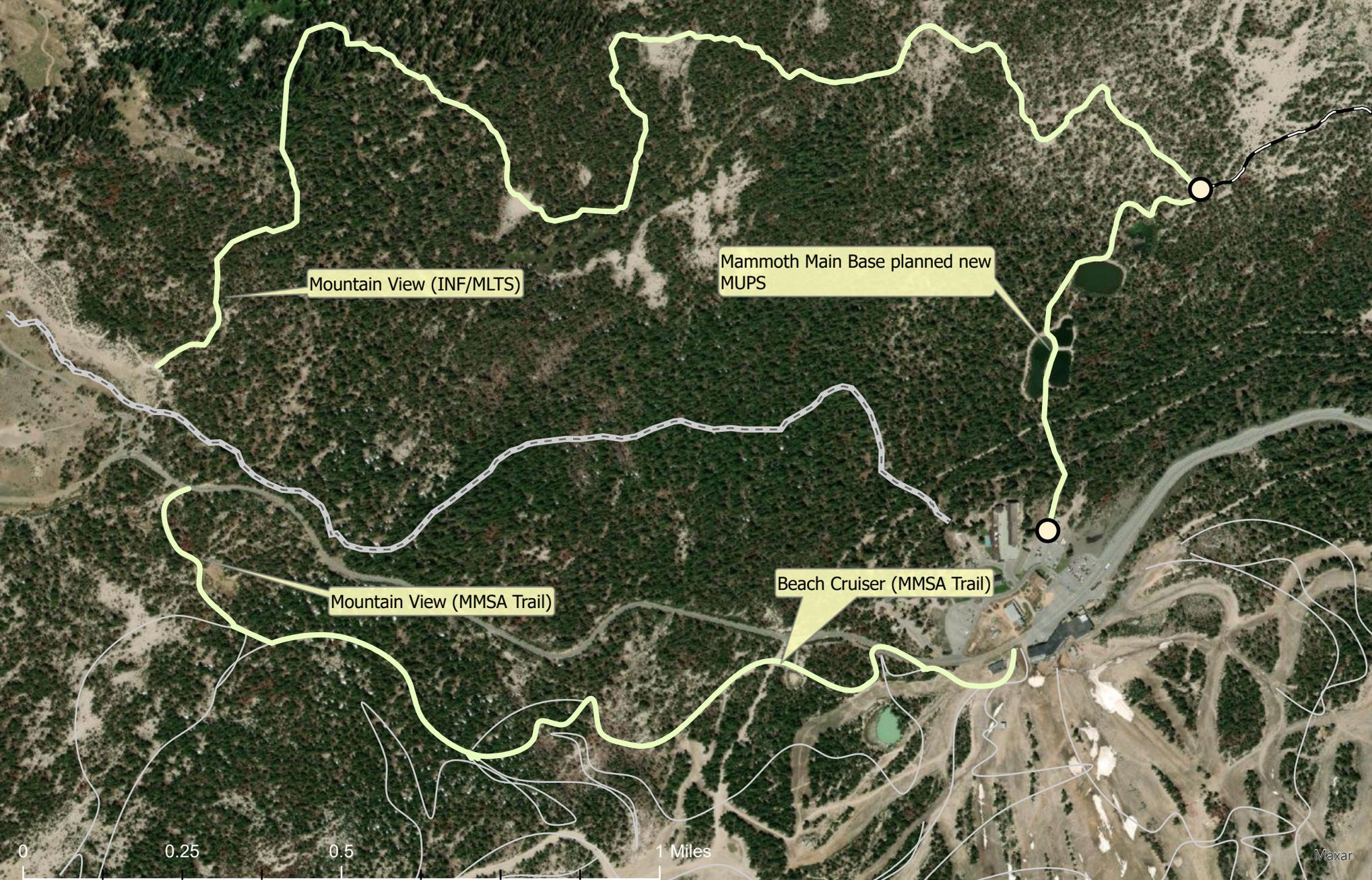
Stump Alley Express

FIGURE 10. PROPOSED MAIN LODGE BASE AREA (SUMMMER)

EXISTING	PROPOSED
SUP Boundary	Highway
Snowmobile Trail	Road
Mountain View Trail	Paved Sidewalk
Biking Trails	Natural Surface Paths
Hiking Trails	Bike Trail Reroutes
Mountain Roads	Buildings
Lifts	Parking
USFS Permit Cabins	Water Bodies
SE GROUP	Summer Lift Upgrades
	Proposed Lift
	Previously Approved Lift



- Recommended Public Access Loop (4.5 Miles)
- INF Trails
- MMSA_Bike_Park_Trails
- Minaret Vista Trail (Hiking Only)
- Updated Sign Locations



Mountain View (INF/MLTS)

Mammoth Main Base planned new MUPS

Mountain View (MMSA Trail)

Beach Cruiser (MMSA Trail)

0 0.25 0.5 1 Miles

Maxar