

Ever active in keeping their options for expansion open, MMSA has fought to open the Mammoth to June corridor (15,000 acre San Joaquin Roadless Area) to ski development, e.g., during the adoption of the 1988 Inyo National Forest Plan and more recently during the comment period for the President's Roadless Initiative. In their comments on the 1988 Forest Plan, MMSA "request[ed] an addition of approximately 7.3 thousand acres to the 21.8 thousand acres designated as existing or potential ski area" (MMSA comments to 1988 Land and Resource Management Plan, Appendix A, p.125). The request named Yost Creek, Hartley Springs, White Wing, San Joaquin Ridge, and Deadman Creek as hoped for areas of expansion. In summer 2000, MMSA noted that the Roadless Initiative would endanger the "planned expansion of Mammoth Mountain" (MMSA comment letter, 7/17/00) and proposed that the FS "include in any action or decision an exemption excluding all lands in the National Forest System, and as to MMSA, those areas within the INF, previously identified for resort or recreation site development or expansion from consideration in the Roadless Initiative. This would include all lands within the SUP boundaries of MMSA, those identified in master development plans, those lands designated in forest plans for potential ski area development, and Management Prescriptions 13 and 14 in the INF Forest Plans" (MMSA comment letter, 7/17/00). For more documentation see *Town Council Rejects Roadless Rule*, Mammoth Times 7/20/00.



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JUL 13 1998

July 2, 1998

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WINTER SPORTS		
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FILE	272	MMSA

Re: Summer Project Request

Mammoth/June Mountain Ski Areas would like to submit the following request for summer projects for both ski areas. Most of these projects have already been submitted as part of our Summer Operating Plan, but a few additional projects have only recently been identified. Maps are provided for the new projects. Previously requested projects include:

Mammoth Mountain Summer Projects:

Gondola 2 (Panorama Gondola) – An update of this project includes: Adding a multi-story, approximately 6000 square foot structure to the top station (2500 sq ft on the top floor and 3300 sq ft on the bottom floor) with expansions of the south and west sides of the facility. These additions will allow ample room for the new gondola unloading station and a smoother transition for our guests to access the slopes. The structure would be constructed of steel and glass with concrete areas covered with native rock to fit in with the surroundings. Project is less than 5 acres in size.

Snowmaking Expansion - add the following to the snowmaking network: connector line between Chair 3 and the Top of Chair 5, from Solitude to the Top of Chair 9, Christmas/East Bowl, and connector line with the top of Chair 16. Single trench will contain both air and water lines. All lines will be installed within previously disturbed areas. Project is less than 5 acres in size.

Spook Grade Work - Need to grade Spook so that an intermediate skier is comfortable using the new Chair 10 (Gold Rush Express). Grading and snowmaking will make this trail cat accessible on a regular basis. No timber will be cut and all excavation will be confined to previously disturbed areas. All disturbed areas will be revegetated. Project is less than 5 acres in size.



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Mammoth 1

possible construction during the summers of 1999 or 2000. This project is greater than 5 acres in size, and we would propose to provide a draft analysis to the Forest within the next year.

Establishment of a Warehouse Facility – The ski area has had a need for such a facility for sometime. At the present, deliveries have to be made to each of the base facilities utilizing semi-tractor trailers. In the residential areas of town, this practice adds to the congestion, takes considerable time, and can be ineffective. We are going to spend the next year planning for a location that will serve the ski area's needs. At first glance, building something in the vicinity of the Garage appears to be the preferred location. The facility will be used as a supply depot, repackaging plant, and distribution center. For an operation such as Mammoth, a considerable amount of space will be needed. This project would be less than 5 acres in size

Redevelopment of the Chair 9 Area – The Chair 9 area is the last frontier at Mammoth and in conjunction with the development in the Juniper Ridge area during the summer of 1999, the ski area needs to start planning lift and trail locations. During the summer of 1998, we need to get any and all evaluations or surveys needed to be able to move forward with the planning of this area for next year. It will be the ski area's plan to keep to the approved development plan as much as possible. Possible changes include: realignment of Chair 9 with bottom terminal moved closer to the bottom of Chair 25, establishment of a food service facility near the existing bottom of Chair 25, possibly changing the length of Chair 25, and the establishment of a beginner skier pod near the existing top of Chairs 15/24.

Redevelopment of the Main Lodge Area – In order to be ready for the replacement of the lower Gondola, the planning of the Main Lodge area will need to occur during the summer of 98. There will be many aspects to this process, but it will include the area from the slope side of Main Lodge to the back of the Inn and from the Chalets to the point of winter closure sign. The planned bottom terminal of Gondola 1 will eliminate the western end of Main Lodge, thus displacing lift operations, ski patrol, ski retails and repair, race department, public lockers, and miscellaneous other smaller uses. We will need to construct a three story gondola building and associated facilities and an entry facility housing transportation, ticketing, and food service during the summer of '99. The ski area will be proposing a land exchange for this area shortly.

Face of Five – During the early season, the face of Chair 5 has too many obstacles to allow it to be cat groomed. By adding this to the groomed runs in the area, there will be a choice for the groomed snow users between this run and Solitude. This project may necessitate the removal of a couple of trees near the bottom of the face to provide for a gradual transition back into lower Solitude. All disturbed areas will be revegetated. This project is less than 5 acres in size.

Establishment of a Tree Nursery – The establishment of a nursery in the slash pit from native seed that would be collected from within the ski area boundary. Attempt to grow Lodgepole and Jeffrey Pine, White and Red Fir, and Hemlock. This project would be instituted in conjunction with the use of native grass seed mixtures and in-place germination of native seed sources in This project is less than 5 acres in size.

Widening of Upper Roller Coaster – To provide for a larger skier capacity on the upper portion of Roller Coaster, the ski area would like to widen the upper portion of the run. We would like

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Attn: Roadless Areas Proposed Rule

Re: Proposed Roadless Area Conservation Rule
(Roadless Initiative)

Gentlemen and/or Ladies:

As we previously informed you in our letters of June 27 and 28, 2000, this firm represents Mammoth Mountain Ski Area (MMSA). MMSA is the holder of various Special Use Permits (SUP) within the Inyo National Forest (INF), with MMSA operating resort and recreation facilities and enterprises within the INF, including Mammoth Mountain Ski Area, June Mountain Ski Area, Tamarack Resort and Cross-Country Skiing Center (Tamarack), and Mammoth Snowmobile Adventures.

This letter is intended to serve as comments by MMSA to the Roadless Area Conservation Proposed Rule (Roadless Initiative) and the Draft Environmental Impact Statement (DEIS) issued pursuant to the letter of Forest Service Chief Mike Dombeck dated May 11, 2000 (File Code 1950-3).

As of the date of this letter, and for the reasons expressed and outlined in this comment letter, MMSA has no official position regarding the various alternatives being considered, except that MMSA takes the position that the No Action Alternative should be chosen unless and until full and appropriate planning, collaboration, and public processes pursuant to, among other things, National Environmental Policy Act (NEPA), the Multiple-Use Sustained-Yield Act of 1960 (MUSY), and the National Forest Management Act (NFMA) are implemented and carried out by the USDA United States Department of Agriculture Forest Service - CAET

Further inconsistencies and areas of confusion are demonstrated by the document entitled ROADLESS AREA PROJECT QUESTIONS AND ANSWERS 11/12/99 issued by the Forest Service. Some examples are as follows:

1. In responding to the question, "What are the components of the action proposed in the Notice of Intent (NOI)?," the Forest Service responds in pertinent part: "Local Forest Plan amendment and NEPA processes, both of which require active public collaboration and participation, could be used to implement the procedures and criteria developed in part II. The final rule would delineate the framework for this forest-by-forest implementation process...."

The effect of the proposed action in the NOI is to amend or modify the existing Forest Plan, thereby avoiding or ignoring the appropriate public collaboration and participation required under NEPA.

2. In responding to the question, "What is the relationship between the draft planning regulations and this roadless proposal?," the Forest Service response states in pertinent part: "The proposed planning rule would rewrite the existing Forest Service Planning Regulations. The proposed planning rule would make ecological sustainability the **primary goal** of National Forest System land management...." (Emphasis added).

The flaw in this approach is ignoring people as part of the ecosystem of the National Forest System, and specifically the INF. This results in a change of policy currently expressed in the 1988 Forest Plan and the concept of multiple use.

3. In response to the question, "There are a number of ski resorts or expansion of ski resorts planned for national forests, is this an effort to shut them down?" The Forest Service response begs the question and fails to address the impact of the Action Alternatives in that access to and from such ski resort facilities would be substantially impacted by the Roadless Initiative. In point of fact, the effect of the Roadless Initiative on the proposed Sherwin Bowl Ski Area would be to make the ski area inaccessible. The same would apply to planned expansion of Mammoth Mountain.

 **Mammoth 1**