CHAPTER 8
Recreation Resources

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RECREATIONAL RESOURCES

This chapter addresses potential impacts on existing recreational facilities and opportunities associated with Mammoth Creek, Lake Mary, and the lodgepole pine forest/mixed riparian scrub corridor along Bodle Ditch in proximity to the Lake Mary Road multi-use path. Recreational opportunities associated with the waters and natural setting of the Mammoth Creek corridor, Lake Mary, and the Bodle Ditch corridor include hiking, biking, sport fishing, camping, and general enjoyment of the outdoors.

8.1 ENVIRONMENTAL SETTING

The Mammoth region is known for its broad range of recreational resources, including such amenities as the Mammoth Mountain Ski Area, Mammoth Lakes Basin, Devils Postpile National Monument, Red's Meadow, Inyo National Forest, and the John Muir and Ansel Adams Wilderness Areas. Downhill skiing, cross-country skiing, snowboarding, and snowmobiling are the focus of winter recreation in the area. Mammoth Mountain Ski Area includes Mammoth Mountain, Tamarack Cross-Country Ski Center at Twin Lakes, Scenic Gondola Rides, and Snowmobile Adventures. The Mammoth Mountain Ski Area (MMSA) operates Tamarack Cross-County Ski Center in the vicinity of Twin Lakes during the winter months. The Twin Lakes loop roads, Lake Mary Road, and various trails are groomed for cross country skiing. Also one side of Lake Mary Road is packed and available for snowshoeing and hiking. Lake Mary Road is open for snowmobile access at the beginning of the fishing season in late March. The Lakes Basin is available for snowshoeing and cross-country skiing during the winter.

Summer recreation is dispersed throughout the Town of Mammoth Lakes with trout fishing in the area's streams and lakes, hiking, mountain biking, camping, sight-seeing, horse-back riding, non-motor boating, motor-boating (Lake Mary), golf, and birding, among popular outdoor activities. Devils Postpile/Red's Meadow and the Mammoth Lakes Basin are popular day-use destinations during the warmer months. Recreational facilities in the Mammoth Lakes Basin include two marinas and a USFS campground at Lake Mary. The USFS campground is open to the public only during the four-month summer season.

According to the Sierra Nevada Forest Plan Amendment Final EIS (USDA 2001d), the Inyo National Forest is one of the top five national forests for recreation use nationally and within the Sierra Nevada Forest Plan Amendment study area, which includes 11 national forests; it has the most motorized and non-motorized trails and the greatest number of wilderness acres. In addition, more visits were recorded in the Ansel Adams Wilderness than any of the other wilderness areas in that study area (USDA 2001d).

8.1.1 EXISTING PUBLIC RECREATIONAL FACILITIES

The Town of Mammoth Lakes area provides a range of facilities and programs to support recreational activities and, in this regard, is currently developing a Parks and Recreation Master Plan and Trail System Master Plan, as directed under the Town of Mammoth Lakes 2007 General Plan. The intention of the Town is to enhance and expand public access to trails and enhance other recreational facilities to accommodate existing public need. Existing parks and recreational facilities operated by the Town of Mammoth Lakes and/or located in the vicinity of the Project Area are listed below:

Parks and Recreational Facilities Operated by the Town of Mammoth Lakes:

- Mammoth Creek Park (East and West), located off Old Mammoth Road near Meridian Boulevard, includes 5 acres on property owned by the Town. The park includes Hayden Cabin museum, picnic tables, restroom facilities, children's play area, art sculpture, walking and biking trails, and paved parking. The park is located along Mammoth Creek and provides two bridges across the creek. In addition, the park has trailheads for paved multi-use paths that connect to the Town's Main Path. Multi-use provides for both bicycle and pedestrian traffic. Mammoth Park East is located on USFS land and is operated by the Town under a USFS Special Use Permit.
- Shady Rest Park, on Sawmill Cutoff Road to the north of SR 203, contains 12.5 acres and is the main active sports municipal park in the Town. It includes soccer fields, softball field, restrooms, two sand volleyball courts, picnic areas, a play area, and paved parking. This park is located on USFS land, which is leased and operated by the Town under a USFS Special Use Permit.
- Community Center Park, located at 1000 Forest Trail, encompasses 4.5 acres owned by the Town and includes the Community Center, children's play area, six tennis courts, picnic tables, walking paths, restrooms, and paved parking. The Community Center includes a kitchen, stages, and other facilities and is primarily used for public meetings.
- Whitmore Park located on Benton Crossing contains three baseball/softball diamonds, restrooms, picnic facilities community swimming pool, and paved parking. As stated above, this 18.66-acre park is operated jointly by the Town and Mono County on land leased from the Los Angeles Department of Water and Power. Whitmore is located outside the Project Area, approximately 1 mile northeast of the Mammoth Airport.
- Trails Park, located at Meridian Boulevard south of Commerce Drive, is developed as Brothers Skate Park and encompasses approximately two acres owned by the Town of Mammoth Lakes.

Recreational Facilities on USFS Land:

- Sherwin Creek Campground, just to the south of the Town of Mammoth Lakes, via Sherwin Creek Road, is located near the confluence of Sherwin and Mammoth Creeks. Situated in a Jeffrey pine forest, the campground offers 87 campsites, a convenience store, fishing supplies and opportunity for fly fishing in Sherwin and Mammoth Creeks. A footbridge is located downstream from the Sherwin Creek campground (approximately 2,100 ft downstream from the confluence of Mammoth and Sherwin creeks).
- Hot Creek State Fish Hatchery, just east of U.S. Highway 395 near the Mammoth Lakes Airport, offers free public tours of the hatchery and public access to hot springs.
- Lake Mary Campground, located at the north side of Lake Mary, provides 46 campsites in a lodgepole pine forest. The campground is located on both sides of Lake Mary Road, with a portion located along the shore of the lake. Lake Mary has no public boat ramp, but carry-down access for non-motor and motor boats is available. The Pokonobe Marina and Lake Mary Marina at the lake offer motor boat rentals, and fishing supplies, and access to boat ramps for a fee.
- Coldwater Campground, located to the south of Lake Mary along upper Mammoth Creek, offers 77 campsites within walking distance of Lake Mary.

- Pine City Campground, located to the east of Lake Mary in an area overlooking the lake, offers 10 campsites within walking distance of Lake Mary.
- Twin Lakes Campground, located on the shores of Twin Lakes, offers 92 campsites. MMSA's Tamarack Lodge, which is located adjacent to the campground, offers cabins, a restaurant, a store, and rental canoes and rowboats. Tamarack Lodge operates year-round and is adjacent to a cross-country ski center.
- Mammoth Lakes Pack Outfit, located near Lake Mary, offers horseback riding in the immediate area, and overnight camp trips through the John Muir and Ansel Adams Wilderness areas.

In addition to these facilities, the Town of Mammoth Lakes provides a network of bike paths and trails and proposed trails, as listed in the Draft Parks and Recreation Plan and Final Draft Trail System Master Plan. Bike paths or other amenities in the vicinity of Lake Mary, Bodle Ditch, or Mammoth Creek include the Lake Mary Road multi-use path (Class 1), future multi-use bridges across Mammoth Creek at Sherwin Street and Waterford Avenue, a possible boardwalk along a section of Mammoth Creek to the west of Minaret Road, existing trailhead amenity and bridge at Mammoth Creek Park West, existing trailhead amenity and bridge at Mammoth Creek Park East, long-term (future) multi-use path (Class 1) along Mammoth Creek Road to the east of Old Mammoth Road, and a deed-restricted Town of Mammoth open space along Mammoth Creek just east of Valentine Reserve. Multi-use paths are paved or de-composed granite pathways that are off-road and available to both pedestrians and bicycles. These facilities are discussed in more detail under Section 4.5.1.2, Trail System Master Plan Final Draft, below.

8.1.2 RECREATIONAL VALUE OF THE PROJECT AREA

The Project Area includes Lake Mary, Bodle Ditch, Twin Falls, and Mammoth Creek, which are the primary features potentially affected by the project that contribute to the recreational value of the area. The recreational value of these locations is discussed in detail below.

8.1.2.1 LAKE MARY

Lake Mary is the site of several recreational activities and facilities, including two rental boat marinas, USFS lake-side camping at the Lake Mary Campground, boating (motor and non-motor, but no sailing), and fishing. The Lake Mary Campground is a public USFS campground located at the north side of the lake. The north shore of the lake features a shallow shoreline with boat access. However, no boat ramps are provided and boating in one's own craft is carry-down only. No swimming is allowed. Water levels in the lake vary throughout the year, due to the natural snowmelt driven by hydrology and WOCs listed in Permit 17332 (see Chapter 2 – Proposed Project and Atlernatives) that set the maximum annual drawdown, intermediate seasonal drawdown, bypass flows, and timing of storage accumulation. The maximum drawdown of the lake is 5.7 ft. The lake has a maximum seasonal drawdown of 3.0 ft prior to September 15. The drawdown maximums are set forth in the WOCs.

During the winter and spring, Lake Mary Road is closed to vehicles past the turnoff to Tamarack Resort, near the outlet of Twin Lakes, but is accessible via cross-country skiing, hiking, and snowshoeing. Lake Mary Road is open for snowmobile access at the time of the opening of fishing season (generally late March). At this time, Lake Mary provides opportunities for ice fishing. No snowmobiling is permitted on the lake. Boating and fishing activities are not meaningfully diminished by the maximum drawdown of the lake since the

maximum drawdown (5.7 ft) is relatively small in comparison to the size (one mile in length) of the lake. Because of the size of the lake, adequate water is available for boating activities and fishing even during a maximum drawdown. The maximum drawdown does not affect the depth of water needed for the operation of docking facilities at the two marinas or shore side boat access. In addition, the lake becomes available to boating concurrently with snow melt when the lake fills. Camping and boating facilities are seasonal and are generally open for a four-month period from June to September. The maximum intermediate seasonal drawdown of 3.0 ft prior to September 15, also does not meaningfully affect boating, fishing, or camping activities.

8.1.2.2 BODLE DITCH CORRIDOR

Bodle Ditch is a man-made feature originally developed to provide water from Mammoth Creek and Coldwater Creek to a former mining settlement to the southwest of the Town of Mammoth Lakes, and later to convey water to the Mammoth Meadows area for use by the USFS pack station and other USFS permittees, e.g. cabin owners, Twin Lakes Campground, and other entities. Water supply from Bodle Ditch to each of these uses has been discontinued. For purposes of this analysis the ditch is referred to in three sections, the upper, middle, and lower reaches. The upper reach of the ditch originates at the northeast edge of Lake Mary and generally follows Lake Mary Road, a distance of approximately 0.5 mile to a culvert through which Bodle Ditch passes under Lake Mary Road. A seasonal seep that originates in the vicinity of the Lake Mary Road culvert flows westerly toward Twin Lakes, forming a narrow riparian corridor; however this seepage is not related to water from Bodle Ditch. The upper reach of the ditch passes through a mixed lodgepole pine forest/montane riparian scrub plant community, with more dense riparian growth near the outlet of Lake Mary. Sections of the vegetation community along the upper reach of Bodle Ditch to the west of Lake Mary Road would be in close proximity to the new Lake Mary Road multi-use path. Riparian vegetation, the lodgepole pine forest, and annual wildflowers occurring along the route of the path in the vicinity of Bodle Ditch may provide opportunities for the enjoyment of summer wildflowers, wildlife observation, contemplation, and similar recreational activities. These activities are consistent with the goal of the Town of Mammoth Lakes General Plan and Parks and Recreation Master Plan to provide open space for outdoor recreation and contemplation. As a seasonal, man-made ditch, Bodle Ditch has not served as a fishing destination or as a point of recreational interest, in itself.

A section of the Lake Mary Road multi-use path is proposed for completion near the upper reach of Bodle Ditch in late 2010. The multi-use path, between the Bodle Ditch culvert that passes under Lake Mary Road on the north and the outlet of Bodle Ditch from Lake Mary on the south, will parallel Lake Mary Road for approximately 0.80 mile. In this same area, the Lake Mary Road multi-use path will also closely parallel or enter the Bodle Ditch mixed lodgepole pine/riparian corridor for a combined distance of approximately 0.35 mile near Lake Mary Road. Bodle Ditch, in the Vicinity of Mary Lake Road Multi-Use Path, below, illustrates the location of the Bodle Ditch corridor with respect to the Lake Mary Road multi-use path, Lake Mary Road, and the Lake Mary Campground.

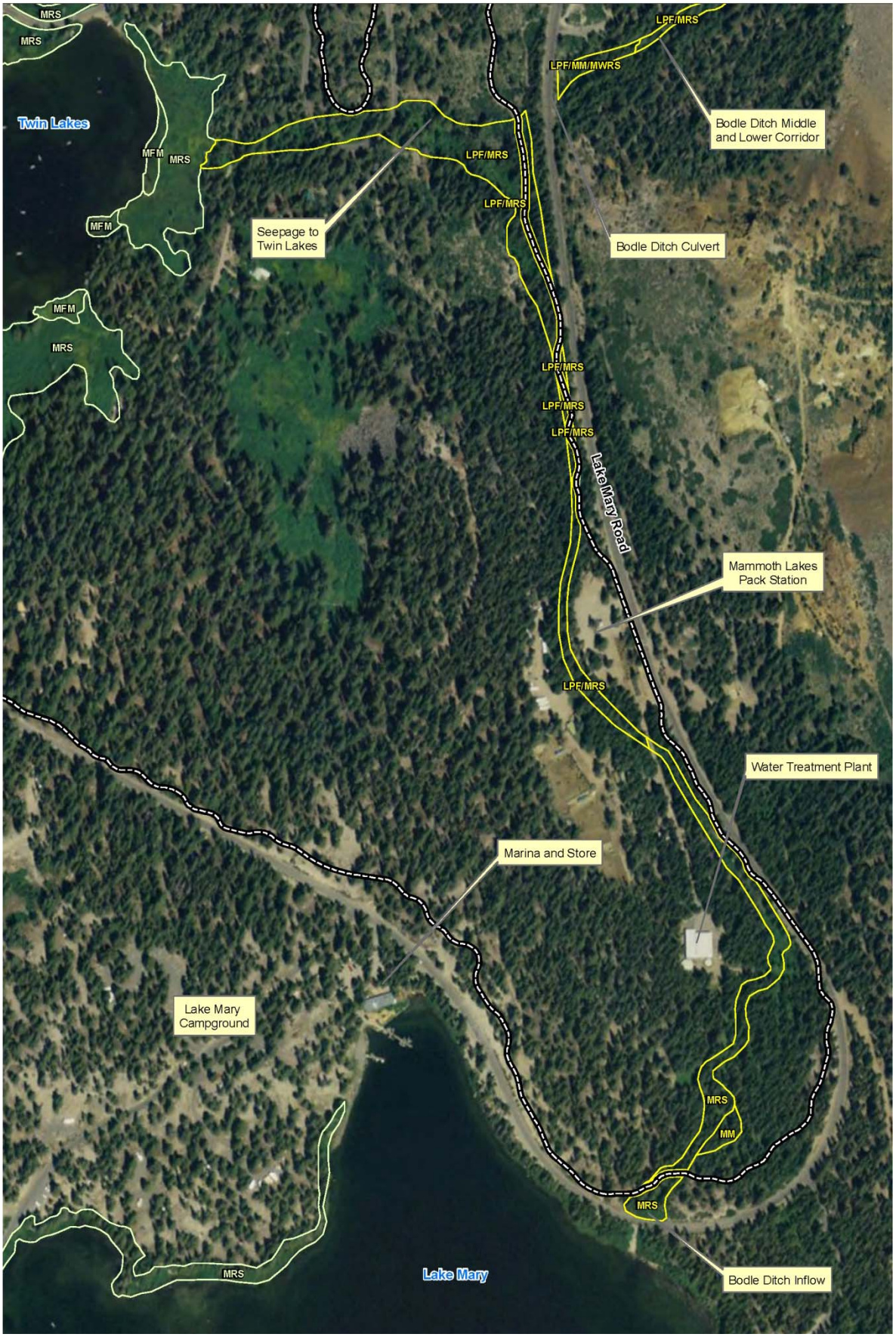

Figure 8-1. Bodle Ditch, in the Vicinity of Mary Lake Road Multi-Use Path

The Lake Mary Road multi-use path is a recently developed public trail, under the jurisdiction of the Town of Mammoth Lakes. The multi-use path, which extends approximately 5.3 miles between the urban center of the Town of Mammoth Lakes and Horseshoe Lake in the Mammoth Lakes Basin, allows pedestrians, bicycles, and other non-motorized conveyances. The section of multi-use path between the urban center and the Mammoth Creek outlet from Twin Lakes was completed in fall 2009. The remainder of the multi-use path, between the Twin Lakes outlet and Horseshoe Lake (the terminus of the path), is anticipated for completion in late 2010. The multi-use trail will provide a connection between the Lake Mary and Twin Lakes campgrounds, and between the campgrounds and the town center. The multi-use path has the potential to be heavily used by visitors to resorts and campgrounds in the Lakes Basin, as well as by hikers and cyclists from the Mammoth Lakes town center. The Town of Mammoth Lakes anticipates the use of a shuttle that would transport cyclists and other trail users to the Lakes Basin. From the Lakes Basin, the multi-use path would be downhill back to the town center.

To the east of Lake Mary Road, the middle and lower reaches of Bodle Ditch flow easterly in a gradually steepening descent approximately one mile through a mixed montane meadow/willow/riparian scrub/lodgepole pine plant community and terminate in a montane meadow located to the southwest of the Old Mammoth and Snowcreek neighborhoods. Access to the middle and lower reaches of the ditch is generally impeded by dense vegetation and sections of steep grade, which limit the use of the middle reach and inaccessible areas of the lower reach of the ditch as a recreational resource.

8.1.2.3 TWIN FALLS

Twin Falls is a water cascade in the upper Mammoth Creek basin between Lake Mamie and Twin Lakes. The falls drop 350 ft, 160 ft of which are vertical and highly visible from trails and shoreline in and around Twin Lakes. The Twin Lakes area has several resorts, cabins and other summer uses that generate a high level of summer recreational activity. Twin Falls contributes to the enjoyment of the recreational experience of Twin Lakes for hikers, boaters, and visitors at the USFS Twin Lakes Campground. Twin Falls is also in close proximity to the Lake Mary multi-use path and a short walking distance from the Lake Mary Campground. The campgrounds, and multi-use path are closed during the late fall, winter and early spring months, when Lake Mary Road is inaccessible by automobile. During the same period (November to May), natural flow to the falls is minimal since precipitation is held as snowpack. Twin Falls serves as a recreational resource since it is an important destination for hikers and visitors to the Mammoth Lakes Basin, and strongly contributes to the recreational enjoyment of the Lakes Basin.

8.1.2.4 MAMMOTH CREEK

The stream flow in Mammoth Creek is dependent upon precipitation and varies widely year to year. The annual discharge has ranged from about 2,500 AF of water during the driest runoff year on record to nearly 45,000 AF of water during the wettest runoff year on record.1 Although

1 MCWD Draft EIR (2000), page 3-2 (which states" At the flow gage maintained by the Los Angeles Department of Water and Power near old U.S. Highway 395 (LADWP gage) since 1935, total annual discharge (runoff year April through March) has ranged from about 2,500 AF of water (1977 runoff year, the driest runoff year on record for the region) to nearly 45,000 AF of water (1983 runoff year, the wettest runoff year on record for the region").

extremely variable, water flows in Mammoth Creek follow a consistent seasonal pattern with maximum flows occurring during the early summer. As a result of the variation in seasonal and year-to-year precipitation, recreational use of Mammoth Creek, including use of public parks and open space along the Mammoth Creek corridor, camping, hiking, and sport fishing may also vary throughout the year and from year to year.

The five reaches of the Lower Mammoth Creek sub-basin, which extends from the outlet of Twin Lakes to Hot Creek, provide a variety of recreational resources and fishing opportunities. Reach A, in the upper portion of Mammoth Creek, consists of the portion of the stream from just below the Twin Lakes outlet to Sherwin Street in the Town of Mammoth Lakes urban growth boundary (UGB). This segment is relatively steep with an average gradient of approximately 12.3%. This upper portion of Reach A passes through Valentine Reserve, a University of California preserve and educational facility. Visitors to the area can view and enjoy the water cascades that make up much of the stream. Although sport fishing is possible in Reach A, this segment of Mammoth Creek does not provide as supportive a fish habitat as other areas of the stream (see Chapter 6 –Fisheries and Aquatic Resources).

The concentration of brown trout and opportunities for sport fishing is generally highest in Reach B, which extends from Sherwin Street through the south edge of the Town of Mammoth Lakes to a point located approximately 1,300 ft to the east of the Old Mammoth Road. This reach also passes Mammoth Creek Park, which provides public access to the stream and outdoor recreation along the creek, including picnicking. The concentration of rainbow trout is generally highest in Reaches C and D (the stream's "middle"), which extend from the edge of Reach B to U.S. Highway 395. This portion of the creek passes Sherwin Creek Campground, which has support facilities for sport fishing. Sherwin Creek Campground also provides creek side camping and hiking opportunities and general enjoyment of both Sherwin Creek and Mammoth Creek.

The topography in the Reach E flattens considerably and large boulders and trees in the creek basin that are attractive to outdoor recreationists are not as prevalent. In addition, much of Reach E (a three-mile-long section) flows through Chance Meadow, a meadow area that is generally closed to the public. In Chance Meadow, Mammoth Creek is characterized by extensive meanders and undercut banks and is not as suitable for outdoor recreation, camping or other streamside activities. Fishing season generally runs from late April through mid-November.

Recreational activity along Mammoth Creek is lowest during the winter months when upstream and in-bed water supplies are frozen over. Sport fishing in Mammoth Creek is generally limited to trout, such as brown and rainbow trout, due to the low diversity of fish species. However, as discussed in Chapter 6 – Fisheries and Aquatic Resources, fisheries and aquatic resources are in good condition, and fishing is a popular recreational activity in the Lower Creek basin.

8.2 REGULATORY SETTING

8.2.1 INYO NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN

The USFS Inyo National Forest Land and Resource Management Plan (LRMP) (1988) establishes management goals for the multiple use and sustained yield of public benefits for the Inyo National Forest, and responds to major public issues and management concerns. LRMP Chapter 3 sets forth a "summary of the analysis of the management situation," which applies to economic concerns and identified resources, including recreational resources.

According to the LRMP, recreation is the most significant resource on the Inyo National Forest, and the Forest is expected to continue in providing recreational opportunities for the foreseeable future. The LRMP states that the economic stability of all Eastern Sierra communities rests heavily on recreation-based income and that most of the major attractions that bring recreationists to the area are located on Inyo National Forest land. According to the LRMP, on lands with potential for both recreation and other resources, current practice usually emphasizes recreational values. The LRMP further states that an opportunity exists in which it can be decided which areas will be managed for varying recreational opportunities, how those opportunities will be enhanced, and what types of resource management are consistent with a recreation emphasis. According to the LRMP, the demand for recreation on the Inyo National Forest is tied primarily to the population of Southern California. The LRMP expects demand to exceed the existing capacity of many USFS recreational facilities and that the current emphasis on destination-oriented camping in the Forest will continue.

The LRMP also discusses the importance of riparian vegetation to recreation and states: "Recreationists seek these areas for shade and water as a relief from the hot, dry surroundings. The demand for riparian area-dependent resources is expected to increase dramatically, especially as riparian values serve as a recreational attraction and are subject to the increasing demand for recreation."

The LRMP further states that the demand for trout fishing in the Inyo National Forest is high and that resident trout habitat enhancement alone is not capable of increasing fish production to meet that demand. According to the LRMP, much of the existing fishing load is borne by hatchery-stocked fisheries and, recreational fishing encompasses a range of trout and other species. The LRMP emphasizes fish habitat management and directs that fisheries in concentrated recreation areas be maintained or enhanced to provide more fishing opportunities.

LRMP recreational policies are as follows:

- Construct and maintain facilities and sites to regional standards.
- Construct and maintain sites and associated water systems and wastewater treatment plants to Facility Condition · Class 1 as defined in the recreation resource inventory.
- Emphasize permitted activities rather than prohibited ones on signs to lessen recreation use conflicts.
- Provide screening and shade, using vegetation and/or artificial structures, to increase use on less attractive sites.
- Develop new campsites in concentrated recreation areas before other locations to generate increased use and higher return to the U.S. Treasury.
- Develop associated day-use facilities and interpretive and informational sites and trails, together with overnight campgrounds, to achieve a balanced facility package.

The Project Area, which extends from Lake Mary to Hot Creek, is located within two LRMP Management Areas including Management Area #8, the Mammoth Escarpment, and Management Area # 9, Mammoth. Management Area # 8 incorporates Mammoth Lakes Basin, including Lake Mary, Lake Mamie, Twin Lakes, and the Mammoth Creek headwater, as well as the crest and mountainous area surmounting Mammoth Lakes Basin. Developed recreation is the primary use in Management Area #8. The Mammoth Lakes Basin is important for both summer and winter recreation purposes and, according to the LRMP; this area has more recreational visitors than any other area in the Inyo National Forest.

Management Area #9 contains private land within the Town of Mammoth Lakes, USFS land, and land owned by the City of Los Angeles in the eastern portion of the Management Area. Sherwin Creek Campground is an important USFS facility in this Management Area. Because of the proximity of the Town of Mammoth Lakes to the National Forest, many National Forest land uses are directly related to the support of this resort community. According to the LRMP, recreation use is heavy at Sherwin Creek Campground, a USFS facility adjacent to Mammoth Creek. The LRMP also states that heavy dispersed use also occurs along Mammoth Creek and on Forest lands immediately adjacent to private land in the Town of Mammoth Lakes. The LRMP also recognizes Hot Creek Fish Hatchery and Hot Creek as important features in this Management Area.

The LRMP sets forth policies for the management of recreational resources in the designated Management Areas. Recreational resources prescriptions/policies that are applicable Management Area #8, a designated Concentrated Recreation Area, include the following:

- Develop recreation campsite plans to inventory, coordinate and program the full summer and winter recreation development potential in the area in Prescription #12 (Lakes Basin).
- Identify and program dispersed trail facilities in the areas in the Lakes Basin. Include hiking and equestrian trail opportunities in all areas and bicycle trails in the Lakes Basin. Include opportunities for mountain bike trails within the Management Area. Interface trail systems with the community. Maintain levels of reservoirs in Mammoth Lakes Basin to desirable levels for recreation use and scenic enhancement during the entire summer use season.
- Emphasize day-use activities within the Mammoth Lakes Basin by developing needed day-use facilities to complement overnight campgrounds.
- Limit resort capacity in the Mammoth Lakes Basin to 10% above 1985 levels.
- Emphasize development of front country trails, particularly those linking Mammoth to the Forest.
- Maintain current use patterns and open space on National Forest Service System lands adjacent to Valentine Reserve.

LRMP recreation-related policies applicable to Management Area #9 include the following:

- Provide trail interface opportunities with the community of Mammoth Lakes.
- Maintain open-space areas adjacent to the Town of Mammoth Lakes for passive recreation use.
- Prohibit dispersed camping throughout the Management Area.
- Allow development of Mammoth Creek Park by the Town of Mammoth Lakes.
- Identify and program the expansion potential of the Shady Rest and Sherwin Creek Campground complexes and develop as funds become available.

8.2.2 TOWN OF MAMMOTH LAKES GENERAL PLAN

The Town of Mammoth Lakes General Plan establishes standards, guidelines and priorities that define the community now and for the future, in which Mammoth Lakes is envisioned as a premier, thriving, sustainable community. The Community Vision for Mammoth Lakes

embodies values and principles that recognize the uniqueness of the natural surroundings, including uniquely spectacular scenery and diverse four-season recreational opportunities.

According to the General Plan, among its many goals, the Town of Mammoth Lakes places a high value on being a year-round resort community based on diverse outdoor recreation, multi-day events, and an ambiance that attracts visitors. The General Plan states that parks, open space, and recreational opportunities in Mammoth Lakes are critical to the town's residents and to the success of the Town's tourism-based economy.

Goals and policies applicable to recreational resources are the following:

- P.1. Goal: Maintain parks and open space within and adjacent to town for outdoor recreation and contemplation.
- P.2. Goal: Provide additional parks within town.
- P.2.A. Policy: Coordinate open space programs and policies with the Inyo National Forest, City of Los Angeles and Mono County.
- P.2.B. Policy: Require usable public recreation open space in all master planned developments.
- P.2.B.1. Action: Develop a comprehensive and integrated year-round Parks and Recreation Master Plan.
- P.2.B.2. Action: Actively seek grant funds for parks, open spaces and recreational activities.
- P.2.B.3. Action: Maintain a Master Facility Plan and Development Impact Fee schedule.
- P.2.C. Policy: Maximize parks and open space through flexible form-based zoning, development clustering and transfers of development rights within individual districts.
- P.2.C.1. Action: Establish zoning districts that allow parks, recreation and ancillary facilities.
- P.2.D. Policy: Increase understanding and appreciation of the cultural, natural and historical resources of the region and town through development of programs, facilities and interpretive signage.
- P.2.E. Policy: Include interpretive signage in parks, trails and public rights-of-way.
- P.2.E.1. Action: Plan, design, and implement an interpretive signage program.

P.3. GOAL: Create a Master Plan for an integrated trail system that will maintain and enhance convenient public access to public lands from town.

- P.3.A. Policy: Ensure public routes for access to public lands are provided in all developments adjacent to National Forest lands.
- P.3.B. Policy: Coordinate with multiple organizations, agencies and jurisdictions to plan, steward, interpret, promote and sustain trails, public access and outdoor recreation amenities in the Mammoth Lakes region.
- P.3.C. Policy: Identify and acquire points of public access to public lands (from within the Urban Growth Boundary to surrounding public lands) through cooperative arrangements including easements, purchase or other means of title acquisition

P.4. GOAL: Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.

- P.4.A. Policy: Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.
- P.4.B. Policy: Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors.
- Applicable activities include but are not limited to:
    - Walking
    - Interpretive trails & signage
    - Touring
    - Street & mountain biking
    - Camping
    - Fishing
    - Fall-color viewing
    - Birding
    - Equestrian activities
- P.4.C. Policy: Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.
- P.4.C.1. Action: Specifically address use, needs and operations of motorized and non-motorized recreation users in a year round comprehensive recreation plan.

P.5. GOAL: Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes.

- P.5.A. Policy: Create open space corridors by combining open space on neighboring properties.
- P.5.B. Policy: Design and construct trails as components of a regional and local network for recreation and commuting.
- P.5.C. Policy: Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.
- P.5.C.1. Action: Prepare an expanded Master Plan to link trails, parks and open space.
- P.5.D. Policy: Design public and private streets not only as connections to different neighborhood districts but also as an essential element of the open space system. Include parks and plazas, treeline open spaces and continuous recreational paths in design.
- P.5.E. Policy: Design parks and open space to be accessible and usable except when set aside for preservation of natural resources, health and safety.
- P.5.G. Policy: Identify, zone and procure land for new and expanded parklands including (but not limited to:
    - Natural pockets of forest
    - Greenbelts
    - Streamside parks
    - Open space
    - Passive parks

- P.5.G. Policy: Identify, zone and procure land for new and expanded parklands including streamside parks.
- R.1.G. Policy: Support efforts to regulate in-stream flows and lake levels to maintain fishery and other wildlife habitat.

8.2.3 TOWN OF MAMMOTH LAKES DRAFT TRAIL SYSTEM MASTER PLAN

The purpose of the Town of Mammoth Lakes Draft Trail System Master Plan (2009) is to update the 1991 Trail System Plan, in accordance with the 2005 Town of Mammoth Lakes General Plan. This document also carries forward projects from the Town's General Bikeway Plan. According to the Trail System Master Plan, Elements of the 2006 Physical Development and Mobility Study, the 2008 Draft Park and Recreation Master Plan, and other planning efforts are brought together in order to create the vision of an integrated trails network that enhances recreation and mobility in the Mammoth Lakes area and provides the widest range of outdoor experiences for both residents and visitors.

The Town of Mammoth Lakes has approximately nine miles of paved, off-street trails, not including the recently constructed, 5.3-mile-long Lake Mary Road multi-use path, that were developed in accordance with the Town of Mammoth Lakes Trail System Plan (1991). The 1991 Trail System Plan outlined the development of a trail system comprised of a paved "Main Path" forming a loop around town and a series of "Future/Alternative" trails extending out from the Main Path into the Mammoth Mountain Ski Area and other National Forest Lands. The plan described the primary uses to be accommodated on the Main Path as walking, jogging, mountain biking, cross-country skiing and road biking. Much of the "Main Path" system described in this plan has since been constructed.

Two near-term projects, including Old Mammoth Road 4b and the Waterford Bridges will close key gaps in the Main Path. The key remaining gap from the 1991 Trail System Plan will be Main Path Segment 4a between Mammoth Creek Park and Minaret Road which includes the tunnel under Minaret Road. The Draft Trail System Master Plan proposes the construction of the Mammoth Creek Park Connector between Meadow Lane and the Main Path. The recently constructed, 5.3-mile-long Lake Mary Road multi-use path provides a connection between the Lakes Basin and the Main Path system.

The Draft Trail System Master Plan also recommends that the Town of Mammoth Lakes and its partners implement several multi-use paths outside the UGB and identified projects formerly identified in the 1991 Trail System Plan as "Future/Alternative" paths. These include the approximate 1.06-mile Mammoth Creek Path, which would extend from the Main Path to the eastern terminus of Mammoth Creek Road. The Mammoth Creek Path could be constructed on or adjacent to Mammoth Creek Road in the proximity of Mammoth Creek. Either of these alignments has the potential to extend the reach of the recreational network and provide an alternative to Highway 203 for long distance road rides. This project would require coordination with the USFS and take into consideration environmental issues and the potential impacts to existing users of this unpaved roadway.

Under the Draft Trail System Master Plan, the only existing soft-surface trail that falls completely within the urban growth boundary is the walking trail through Snowcreek Meadow. The trail extends from Waterford Avenue near Majestic Pines and follows Mammoth Creek on the north side to Minaret Road. In some sections close to the creek, the footpath fills with water at times, causing users to walk off the trail and create adjacent paths. According to the Draft Trail System Master Plan, this is known as trail braiding and can be addressed through the use

of a low wooden boardwalk in the proximity of Mammoth Creek. The trail is on private property and is currently maintained by the Snowcreek Meadow Committee. The Draft Trail System Master Plan states that the Town of Mammoth Lakes currently has an easement in the area and could potentially construct the low impact wooden boardwalk and take over responsibility for maintaining a trail segment within the easement.

Goals and objectives of the Trail System Master Plan are listed below:

Goal 1: Develop a plan for an integrated year-round trail network that provides for a seamless transition between the Town of Mammoth Lakes, the Mammoth Mountain Ski Area, and the surrounding federal lands (USFS).

- Objective 1.1: Identify improvements for signage, wayfinding and amenities throughout the existing network.
- Objective 1.2: Close gaps in the existing network.
- Objective 1.3: Expand the network within the Urban Growth Boundary to provide access to new destinations, activities and experiences from both public and private property.
- Objective 1.4: Identify locations for potential recreation nodes and public access easements that will enhance connections between Town and surrounding public lands for summer and winter recreation.
- Objective 1.5: Identify preferred summer and winter uses for each segment in the network.
- Objective 1.6: Provide design guidelines that will minimize user conflicts, provide for sustainability, and reduce maintenance needs.
- Objective 1.7: Provide uniform signage and wayfinding along the network and at all recreation nodes.

Goal 2: Develop a plan that enhances mobility in a way that is consistent with the Town's "Feet First" strategy.

- Objective 2.1: Identify necessary improvements to improve pedestrian safety, convenience and comfort.
- Objective 2.2: Update the General Bikeway Plan and develop an on-street bikeway network that enhances bicyclist safety, convenience and comfort.

8.2.4 TOWN OF MAMMOTH LAKES DRAFT PARKS AND RECREATION MASTER PLAN

The purpose of the Parks and Recreation Master Plan is to outline a vision of parks and recreation facilities to serve the year-round recreational needs of the Town of Mammoth Lakes, while also reinforcing the expressly stated values of the Mammoth Lakes community. As an updated vision for parks and recreation, it currently replaces the 1990 Parks and Recreation Element of the Town's General Plan.

The Draft Parks and Recreation Plaster Master Plan (2008) primarily concerns developed parks and recreation facilities for the Town of Mammoth Lakes. These amenities contribute to the Town's quality of life by encouraging year round activity and appreciation of nature. The Draft Trail System Master Plan acknowledges, however, that the Town's parks are just a portion of the area's significant outdoor open space that residents and visitors find so compelling.

Development of the Draft Parks and Recreation Plaster Master Plan has considered open space resources in addition to the Town's parks. These additional resources include:

- Federal public lands primarily National Forest, but also Bureau of Land Management lands in and around Mammoth Lakes
- Open space associated with the Mammoth Creek corridor, including Town-owned parcels
- Valentine Reserve
- Undeveloped private and Town-owned green space within the urban growth boundary
- Lands owned and managed by the City of Los Angeles

The Draft Parks and Recreation Master Plan embodies goals of the adopted 1990 Parks and Recreation Element, including Goal 1 of the 1990 Plan to develop the Mammoth Lakes community as a quality year-round recreation and destination park and Goal 2 of the 1990 Plan to assure the availability of adequate park and recreation facilities for the existing and future citizens of the Town of Mammoth Lakes. Proposed goals in the Draft Parks and Recreation Master Plan are identical to Goals P.1 through P.5 set forth in the Town of Mammoth Lakes General Plan discussed above.

According to the Draft Parks and Recreation Master Plan, the surrounding public lands are especially crucial. They function not only as a year-round recreational resource (especially for trail uses, such as biking, hiking, skiing, and snowmobiling), but they also provide much of the scenic context for the Town. These lands also are an important place for people to "get away from it all" and enjoy the peace and beauty of nature. According to the Draft Parks and Recreation Plaster Master Plan, integration of existing resources would maximize these resources by allowing them to work as a multi-functional system that satisfies many needs, including recreation, contemplation, and experiencing the outdoors. The goals and policies of the Draft Parks and Recreation Master Plan are the same as under the General Plan and are used to help guide decision-making for the Town's park and recreation facilities and programs, and serve to illustrate the intent of particular recommendations or directions.

Because the Town of Mammoth Lakes has limited in-town acreage for developing new parks and recreation facilities, the Draft Parks and Recreation Plaster Master Plan recommends that opportunities to jointly develop facilities on other public and private property should be pursued with the appropriate agencies. The Draft Parks and Recreation Plaster Master Plan recommends that several parcels under Town of Mammoth Lakes ownership and deed-restricted open space along the Mammoth Creek corridor (just east of Valentine Reserve) serve as passive recreational uses and trail routes.

According to the Draft Parks and Recreation Plaster Master Plan, federal lands, especially USFS holdings, are extensive in the Town of Mammoth Lakes area. USFS lands in the area are used as trail recreation throughout the year. In addition, USFS lands within and near the Town of Mammoth Lakes' UGB, create an opportunity for the Town to acquire and/or develop these lands for public parks and recreation facilities. According to the Parks and Recreation Master Plan, Mammoth Creek Park East has great potential for additional development to serve recreation needs. Mammoth Creek Park East currently has few improvements and the USFS has granted a Special Use Permit to the Town of Mammoth Lakes for the development of this park. According to the Draft Parks and Recreation Plaster Master Plan, this park has space for activities that may require more land, and its proximity to Mammoth Creek and Mammoth Museum affords interpretive opportunities. According to the Draft Parks and Recreation Plaster

Master Plan, Mammoth Creek Park East could be expanded to serve as a staging area and portal for activities such as hiking, cross-country skiing, and horseback riding. The Draft Parks and Recreation Master Plan states that more planning and design are warranted for this park and other USFS lands that may add to the Town's park and recreation facilities. Specific goals and objectives of the Draft Parks and Recreation Plaster Master Plan are identical to the recreational goals for the 2005 Town of Mammoth Lakes General Plan (see Town of Mammoth Lakes General Plan Goals P.1 through P.5, above).

8.2.5 MONO COUNTY GENERAL PLAN CONSERVATION ELEMENT

Reaches D and E of the lower Mammoth Creek basin and Hot Creek between the confluence with Mammoth Creek and the Hot Creek Flume Gage are located in unincorporated Mono County and subject to land use regulations of the Mono County General Plan. Mono County's General Plan Conservation/Open Space Element is a combination of mandatory General Plan Elements: the Conservation Element and the Open Space Element. The Open Space Element is the County's open space plan. Open space is defined in Government Code § 65560 as any parcel or area of land or water which is essentially unimproved and devoted to an open space use and which is designated in an open space plan for one or more of the following reasons:

- To provide outdoor recreation;
- To preserve natural resources;
- To manage production of resources; and
- To provide for public health and safety.

Natural resources are recognized as the foundation of Mono County's economy and the focus of the Outdoor Recreation Policies of the Conservation Element. Maintaining the high quality of local recreation facilities and opportunities is a major goal requiring the preservation and enhancement of high quality natural resources. Recreation issues involve providing community recreation facilities for residents; providing sufficient recreation facilities outside of community areas for both residents and visitors; providing connections and trail links between communities and various recreation areas; using existing recreation areas and facilities more efficiently; and ensuring that the type of recreation use, where it is located, and when it is developed corresponds to the County's ability to support it with visitor accommodations and services. Since much of the recreation in the County takes place on federal lands, the USFS and BLM are responsible for developing recreational policies and facilities for the recreational use of that land. The Mono County Conservation Element requires the County to coordinate with federal recreational policies, in order to avoid duplication of services and to maximize recreational opportunities in the County. According to the Conservation Element, participation in the Coalition for Unified Recreation in the Eastern Sierra (CURES) offers the opportunity for coordination in providing recreational opportunities while protecting the environment.

The Conservation Element also sets forth Wildlife and Botanical Resources policies to maintain an abundance and variety of vegetation, aquatic and wildlife types in Mono County for recreational use, natural diversity, scenic value, and economic benefits.

8.3 ENVIRONMENTAL CONSEQUENCES

8.3.1 IMPACT ASSESSMENT METHODS

The evaluation of recreational resources provides a comparative analysis of four Project alternatives. These include three action alternatives, consisting of the Proposed Project

Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative. The fourth alternative is the No Project Alternative under which no action or implementation of the objectives set forth in Chapter 2 would occur. The evaluation of the Proposed Project Alternative reflects the evaluation of the Bypass Flow Requirements Alternative No. 2 and the Permit 17332 Bypass Flow Requirements Alternative since the three action alternatives are substantially the same with respect to impacts to recreational resources. The evaluation of the No Project Alternative is divided into the evaluation of the No Project Alternative under the existing level of demand and the No Project under the future level of demand.

The evaluation of potential impacts on recreational resources is based on the identification of existing recreational conditions and opportunities, a review of the features of the project that may affect existing recreational conditions and opportunities, and the identification of any changes in recreational conditions and opportunities that would potentially occur as a result of the project. The analysis also takes into consideration the potential for an Alternative to impede the implementation of applicable land use and recreational plans.

CEQA Guidelines §15125(d) requires that an EIR discuss inconsistencies with applicable local and regional plans. Projects are considered consistent with regulatory plans if they are compatible with the general intent of the plans and would not preclude the attainment of the primary goals of the plan. Since the implementation of regulations and plans is, of itself, administrative in nature, the evaluation of consistency with regulatory plans is to determine if non-compliance would result in a significant physical impact. This is particularly true when a plan or a component of a plan is focused on avoiding physical impacts on the environment.

Based on the discussion of existing recreational resources and opportunities in the Project Area and applicable land use and recreation plans and policies, the determination of significance is made by evaluating the extent to which an Alternative would alter or diminish recreational resources. The evaluation of impacts also takes into consideration the extent to which an Alternative would conflict with applicable recreational policies of local and regional land use and recreational plans and, as such, potentially impede the implementation of such plans. In summary, the evaluation is conducted according to the following procedures:

- Evaluation of the direct or indirect consequences of the Alternative and determination that any features or consequences of the project would directly or indirectly change, alter, diminish, or remove any existing local or regional recreational resources or opportunities.
- Evaluation of the consistency of the Alternative with applicable recreational goals and policies and determination if the Alternative would impede or diminish the recreational goals of the applicable plans in preserving or enhancing recreational resources.

8.3.2 IMPACT INDICATORS AND SIGNIFICANCE CRITERIA FOR RECREATIONAL RESOURCES

Appendix G of the State CEQA Guidelines focuses on the potential for a project to increase the use of parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The CEQA Guidelines also require the review of projects to determine consistency with regulatory plans, particularly those intended to protect the environment, and whether a project would preclude the attainment of the primary goals of the plan. Based on the focus of the CEQA Guidelines, an affirmative response to any of the following questions would result in a potentially significant environmental impact.

- Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?
- Would the Alternative increase demand for the use of recreational resources that would require development of alternative recreational resources, the construction of which would result in secondary physical impacts?
- Would the Alternative be inconsistent with adopted plans, policies, and regulations that would impede the recreational goals of such plans and policies in a manner that would result in a significant physical impact?

8.3.3 ANALYSIS OF ALTERNATIVE COMPARISONS

8.3.3.1 ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT ALTERNATIVE COMPARED TO THE EXISTING CONDITION

FEATURES OF THE PROPOSED PROJECT ALTERNATIVE

Lake Mary

The Proposed Project Alternative would change the timing of the filling of Lake Mary from prior to June 1 of each year, as set forth in the watershed operations constraints (WOCs), to June 30 of each year. This change will account for annual variations in the timing of snowmelt. The proposed amendment is primarily administrative and would not affect the existing required Lake Mary drawdown limitations, which include the annual maximum drawdown of the lake of 5.7 ft, and a seasonal drawdown limit of 3.0 ft prior to September 15.

Regarding other lakes in the Mammoth Basin, the Proposed Project Alternative would remove WOCs that require the District to maintain water levels in Lake George, Lake Mamie, and Twin Lakes, which are under the jurisdiction of the USFS. Since the District has no authority to store water in or regulate flow from these lakes and has not sought water rights to store water in any of these lakes, it cannot comply with existing WOCs to maintain water levels in these bodies. USFS is pursuing the necessary permit updates from the SWRCB to allow its use of Lake Mamie and Twin Lakes for flow-through storage.

Bodle Ditch Corridor

The Proposed Project Alternative would eliminate diversions from Lake Mary into Bodle Ditch. The WOCs specify minimum daily flows that range from 2.5 cfs from May 1 through June 30, 1.5 cfs from July 1 through July 31, 1.0 cfs from August 1 through August 15, 0.5 cfs from August 16 through September 15, and 0.3 cfs between September 16 and November 1. As discussed in Chapter 7 - Wildlife and Botanical Resources, field observations indicate that the riparian vegetation and habitat found along Bodle Ditch appear to be supported primarily by hydrologic inputs other than the diversions from Lake Mary. Based on flow data collected at the old DWP weir located approximately one-half mile downstream from the Lake Mary diversion point the existing WOC flows have rarely been met, due to the capacity limitations of the diversion pipe.

The WOCs also contain a provision for diverting water from Mammoth Creek above Lake Mary into Bodle Ditch. This diversion has been closed since approximately 1977, following a decision by the USFS.

Twin Falls

Twin Falls is a recreational resource along Mammoth Creek at the outlet of Lake Mamie. Since the District does not regulate Lake Mamie and has no authority to do so, the Proposed Project Alternative would amend the WOCs to eliminate existing flow requirements at Twin Falls of 3.0 cfs from June 1 through August 10, and 2.0 cfs from August 11 through October 31 (no minimum flows are required from November 1 through June 1). The District would comply with other WOCs influencing flows at Twin Falls, such as the 3.0 cfs Twin Lakes outlet flow and fishery bypass flows. Given similar hydrologic conditions and District diversions to the Lake Mary WTP, Twin Falls flows would not be significantly different from what has occurred under the Existing Condition (please refer to the impact discussion, below).

In addition to Twin Falls, other resources contribute to the recreational enjoyment of the Lakes Basin, including Lake Mamie, Twin Lakes, Lake George, and others. However, as the District has no authority over these resources, and the Proposed Project Alternative would have no impact on these resources, they are not addressed in this Draft EIR.

Mammoth Creek

The Proposed Project Alternative would maintain on a long-term basis, the existing fishery bypass flow requirements for Mammoth Creek that have been in effect since 1997. The compliance flow measurement point, also in effect since 1997, would remain the OMR Gage. An additional year-round fishery bypass flow requirement of 4 cfs, with compliance flow measurement at the OLD395 Gage, would be added. All of the District's water from Mammoth Creek is diverted at Lake Mary. No water is taken by the District between the OMR Gage and the OLD395 Gage. All of the project alternatives continue the year-round bypass stream flow requirement of 3.0 cfs (mean daily flow) at the Twin Lakes outlet.

USFS Recreational Resources

The Proposed Project Alternative would modify the District's authorized Place of Use (POU) to authorize providing water service to recreation-related uses within adjacent USFS lands. These include the Mill City Tract Cabins, Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park (East), YMCA of Metropolitan Los Angeles, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. Each of these entities currently receives potable water service from the District, but is not located within the current POU specified in the District's water rights licenses and permit.

IMPACT ANALYSIS

Impact Consideration 8.3.3.1-1. Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?

Lake Mary

Lake Mary is the site of several recreational activities and facilities, including two rental boat marinas, lake-side camping, boating, fishing, snowshoeing and cross-country skiing. The Proposed Project Alternative would amend the WOCs so as to not impair its use for recreational purposes. Required water levels would continue with the exception of an amendment to the WOCs to move the required filling of Lake Mary from June 1 to June 30 of each year. Under

existing conditions, with a late snowmelt occurring late in May or after June 1, the filling of the lake is infeasible. The proposed change to the WOCs would allow the filling to occur in coordination with actual snowmelt, including years in which adequate snowmelt is not available until after June 1.

As summarized in Chapter 4 - Hydrology, maximum levels over a 20-year evaluation period have occurred prior to June 1 80% of the time and prior to July 1 95% of the time (see Appendix D-1). During the 20-year evaluation period, Lake Mary fills each year of the 20 years. The average date on which full pool occurs is May 21 under the Existing Condition, compared to May 9 under the Proposed Project Alternative. Lake Mary drawdown would reach 3.0 ft prior to September 15 in only one of the 20 years (for one day) under the Proposed Project Alternative, compared to only two years (one day each) under the Existing Condition.

The Proposed Project Alternative would not change the existing authorized volume or drawdown constraints, including the annual drawdown of 5.7 ft and the seasonal drawdown prior to September 15 of 3.0 ft. Because the authorized drawdowns do not affect access to or enjoyment of summer and winter recreational opportunities along the shore of the lake or the recreational use of Lake Mary under the Existing Condition, and the Proposed Project Alternative would not exceed authorized drawdown constraints, this alternative has a less than significant impact on the use and enjoyment of Lake Mary as a recreational resource.

Bodle Ditch Corridor

The Proposed Project Alternative would eliminate the requirements for the diversion of water from Lake Mary to Bodle Ditch. Water not diverted into Bodle Ditch would remain in the Mammoth Creek system. Bodle Ditch comprises three reaches including the upper reach and middle and lower reaches. Bodle Ditch flows through a mixed lodgepole pine forest/montane riparian scrub plant community along its upper reach and through a varied montane meadow/mixed willow riparian woodland/and lodgepole pine forest along its middle and lower reaches.

Upon its expected completion in late 2010, sections of the 5.3-mile Lake Mary Road multi-use path would parallel and be in close proximity to the upper Bodle Ditch corridor for a total of approximately 0.35 mile. However, of the total combined sections, the lodgepole pine forest/mixed riparian scrub is best developed and more visible from the multi-use path for a distance of approximately 750 ft (0.l4 mile) in the vicinity of the District's water treatment plant. To the north of this area, beyond the Mammoth Lakes Pack Station, the configuration of the ditch and general gradient is less conducive to riparian vegetation. The relationship of the multi-use path to the Bodle Ditch corridor is illustrated in Figure 8-1, above. The multi-use path has the potential to be heavily used by visitors to resorts and campgrounds in the Lakes Basin as well as by hikers and cyclists from the Mammoth Lakes town center. In the vicinity of the water treatment plant, the mixed lodgepole pine forest/montane riparian scrub along the ditch is expected to contribute to the recreational enjoyment of the path. Annual wildflowers that are supported by snowmelt and rainfall are also located along the multi-use path in this area.

As discussed in Chapter 7 - Wildlife and Botanical Resources, based on field observations of existing vegetation and hydrologic conditions, the riparian vegetation and habitat found along upper Bodle Ditch appear to be supported primarily by inputs from other than the diversion from Lake Mary. In addition to water diverted from Lake Mary, other factors contributing to flows in the upper reach of the ditch, include snowmelt runoff from the ridge to the east of Lake Mary Road, which passes through three culverts to this area; the flatter topography of this area

which tends to concentrate runoff; and the elevation of this area below and adjacent to Lake Mary, where shallow ground water from these sources and lake seepage is available to riparian vegetation.

In the middle and lower reaches, active springs are located to the east of Lake Mary Road at the Bodle Ditch's Lake Mary Road culvert and at the base of Red Mountain. Since lush riparian vegetation to the east of Lake Mary Road occurs above the elevation of Bodle Ditch, these indicate other water sources in this area than the Lake Mary diversion. Also, historic diversions to Bodle Ditch may not have been adequate to sustain the lush areas of riparian vegetation viewed in the field. As stated in Chapter 7, data collected from a gage at the LADWP weir between May and October, from 1988 and 2006, indicate that flows in Bodle Ditch were 1.0 cfs or less, with the average monthly discharge in this area of 0.9 cfs, 1.0 cfs, and 0.8 cfs for June, July, and August, respectively.

Although natural flows contribute to the flow in Bodle Ditch, with the cessation of diversion of water from Lake Mary into Bodle Ditch may result in the possibility of localized loss or reduction in abundance and vigor of riparian species along the reach of the ditch, as a "worse case" assumption. The lodgepole pine forest and annual wildflowers in the vicinity of Bodle Ditch would not be affected under any circumstance since these are dependent on snowmelt. Monitoring of riparian species in the vicinity of Bodle Ditch would be required under the Riparian and Wetland Monitoring and Adaptive Management Program (RWMAMP), a feature of the Proposed Project Alternative (see Chapter 2 - Proposed Project and Alternatives). In the assumed "worse-case" event that monitoring indicates the degradation of riparian species, responsive measures as indicated in the RWMAMP will be implemented.

The significance of a potential impact associated with a "worse case" assumption of localized loss or reduction of riparian species along upper Bodle Ditch in the vicinity of the multi-use path is based on whether there would be a substantial detrimental physical change to a recreational resource that would affect the use and enjoyment of the resource. Although loss is not expected, if it were to occur, several factors indicate that the impact on the multi-use path would not be significant. These include: (1) the continued and unimpeded access to, and use of, the multi-use path; (2) the relative short distance (0.14 mile) in which riparian vegetation is pronounced and assumed to contribute to the enjoyment of the 5.3 mile multi-use path; (3) the remaining, unaffected lodgepole pine forest in this area that would continue to contribute to the recreational enjoyment of the multi-use path; (4) the remaining unaffected annual wildflower communities in this area that contribute to the recreational enjoyment of the multi-use path; (5) the continued abundance of riparian species along the shores of the lakes in the vicinity of the multi-use path; and (6) the responsive measures under the RWMAMP that would place a priority on enhancing the quality of public views and the enjoyment of trail experiences within the Mammoth Creek Basin. Taking into consideration the combination of all these factors, it is concluded that under a "worst-case" scenario where reduction or loss of riparian vegetation in the vicinity of upper Bodle Ditch could occur, it would not cause a substantial physical change in the use and enjoyment of the multi-use path. Therefore, the cessation of diversion from Lake Mary to Bodle Ditch under the Proposed Project Alternative would have a less than significant impact on the Lake Mary Road multi-use path as a recreational resource.

Physical access to the middle and lower reaches of Bodle Ditch is limited because of the steep grade in some locations, dense vegetation supported by springs located just east of Lake Mary Road and at the base of Red Mountain, and the absence of trails. As such, the recreational value of the middle and lower sections of Bodle Ditch is limited. Because the recreational value of the

middle and lower reaches of the ditch is limited, the Proposed Project Alternative would not cause a substantial detriment to an existing recreational resource along Bodle Ditch to the east of Lake Mary Road.

Twin Falls

The District has no authority to regulate flows out of Lake Mamie to Twin Falls. Under the Proposed Project Alternative, the District would comply with the fishery bypass flows, Lake Mary outlet flows measured at the Twin Falls flume, and other WOCs. The Proposed Project Alternative would discontinue the minimum flow requirements to Twin Falls; however, there would be a year-round bypass flow requirement of 3 cfs from Twin Lakes. Therefore, the flows out of Lake Mamie to Twin Falls under the Proposed Project Alternative, given similar hydrologic conditions and District diversions to the Lake Mary WTP, would be not be significantly different from what has occurred under the Existing Condition (see Chapter 4 - Hydrology). This alternative would have no impact on the value of Twin Falls as a recreational resource.

Mammoth Creek

The fishery bypass flow requirements under the Proposed Project Alternative, which are the same as those that have been in effect since 1997, with the addition of a year-round stream bypass flow requirement of 4.0 cfs at the OLD395 Gage, will continue to keep the fishery in good condition during all water year types. The bypass flow regimen in existence since 1997 has resulted in fisheries and aquatic resources in Mammoth Creek being maintained in good condition (see Chapter 6 - Fisheries and Aquatic Resources). Recreational activities associated with Mammoth Creek would continue as in recent years. These activities include access to and enjoyment of camping, sport fishing, hiking, biking, sight-seeing, picnicking, contemplation and other outdoor recreational activities. The existing, year-round bypass flow of 3.0 cfs at the Twin Lakes outlet would continue. Therefore, the Proposed Project Alternative would have no impact with respect to existing access to and enjoyment of recreational resources associated with Mammoth Creek.

USFS Recreational Resources

The Proposed Project Alternative would amend the District's authorized POU to allow continued to provide water service to existing recreational uses within USFS lands, including the Mill City Tract Cabins, Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park East, YMCA of Metropolitan Los Angeles Camp, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. Some of these 10 entities claim water rights in the Mammoth Creek watershed, and historically these customers supplied themselves with water using their own treatment systems. Without an amended POU for District service water use, each of these above facilities may no longer be provided potable water service by the District. By continuing to provide water service, which otherwise may not be currently available to these uses, the Proposed Project Alternative would continue to support the region's recreational facilities and, as such, would have no impact on recreational resources on USFS land.

Impact Determination 8.3.3.1-1 - Less than Significant

Mitigation Measure 8.3.3.1-1 - None Required

Impact Consideration 8.3.3.1-2. Would the Alternative increase demand for the use of recreational resources that would require the development of alternative recreational resources, the construction of which could result in secondary physical impacts?

The Proposed Project Alternative would not increase demand for recreational resources through the generation of higher residential populations or other means that would attract more recreationists to existing facilities. No impacts on existing recreational facilities would occur under the Proposed Project Alternative that would require replacement facilities, where the construction of which would result in secondary physical impacts. Therefore, the Proposed Project Alternative would have no impact with respect to this threshold issue.

Impact Determination 8.3.3.1-2 - Less than Significant

Mitigation Measure 8.3.3.1-2 - None Required

Impact Consideration 8.3.3.1-3. Would the Alternative be inconsistent with adopted plans, policies, and regulations that would impede the recreational goals of such plans and policies in a manner that would result in a significant physical impact?

Inyo National Forest Land and Resource Management Plan

The Proposed Project Alternative would be consistent with applicable recreation-related policies of the LRMP. **Table 8-1**, below, compares the consistency of the Proposed Project Alternative to the prescriptive requirements of the LRMP associated with recreational opportunities in Management Areas #8 and #9.

As discussed in Table 8-1, the Proposed Project Alternative would amend the authorized POU to allow continued water service to existing recreational uses on USFS properties. A partial list of these uses includes Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park, Mammoth Lakes Pack Station, and Shady Rest Park. This would be consistent with recreational policies of the LRMP to support and provide day-use activities within the Mammoth Lakes Basin and overnight campgrounds.

The Proposed Project Alternative would be consistent with applicable policies of the LRMP that require desirable water surface levels in the Mammoth Lakes Basin for recreational use during the entire summer season, since it will continue the same water level requirements for Lake Mary as under the WOCs. The Proposed Project Alternative would change the filling of Lake Mary from June 1 to June 30. This reflects variations in the timing of snowmelt. Since storage can occur only when adequate runoff is available, the filling of the lake under Existing Conditions only occurs subsequent to adequate snowmelt. Since the Proposed Project Alternative would not delay filling during earlier snowmelt, the filling of the lake would be substantially the same as under the Existing Condition. As evaluated in Chapter 4 - Hydrology, the average lake full date under the range of water year types will be similar to the Existing Condition. The maximum Lake Mary water level would remain at 8,912.7 ft with a maximum summer drawdown (before September 15) of 3.0 ft. This drawdown has not affected recreational use of the lake under the Existing Condition and would not affect use of the lake with the implementation of WOC change. Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions (i.e., comparable precipitation years) since the District would cease diversion only at particular flow levels and would not control stream levels or flow. As such, the Proposed Project Alternative would not impair passive open space use of the Valentine Reserve along Mammoth Creek, open space areas adjacent to the Valentine Reserve along Mammoth Creek, and in the Town of Mammoth

Lakes, open space along Mammoth Creek. The Proposed Project Alternative would also not impair the intention of the LRMP to allow the Town of Mammoth Lake to develop Mammoth Creek Park East for recreational purposes. The Proposed Project Alternative would not result in a significant detrimental impact on recreational resources addressed in this plan or impede a recreational goal of this plan. Therefore, the Proposed Project Alternative would have no impact with respect to this plan.

Table 8-1. Comparison of the Proposed Project Alternative to the Applicable Recreational Resources Policies of the Inyo National Forest Land and Resource Management Plan

Policy	Evaluation of Project Consistency
Emphasize day-use activities within the Mammoth Lakes Basin by developing needed day-use facilities to complement overnight campgrounds. (The LRMP expects demand to exceed the existing capacity of many USFS recreational facilities and that the current emphasis on destination-oriented camping in the Forest.)	Consistent. The Proposed Project Alternative would amend the authorized POU to continue providing water to 10 recreational uses on USFS properties, which would support the continuation and viability of these uses. These facilities provide a range of recreational day-uses, as well as overnight camping.
Maintain levels of reservoirs in Mammoth Lakes Basin to desirable levels for recreation use and scenic enhancement during the entire summer use season.	Consistent. The Proposed Project Alternative would not change the required seasonal water level requirements for Lake Mary as under the existing WOC's. There would be no change to the maximum level of the lake surface (8,912.7 ft. above mean sea level) There would be no change to the annual maximum drawdown level of 5.7 ft. There would be no change to the maximum summer-season drawdown of 3 ft, as required under the existing WOC's. The Proposed Project Alternative would amend the date for the lake fill from June 1 to June 30. The change in the fill date from June 1 to June 30 would not represent a change from what occurs under the Existing Condition, as lake storage occurs as soon as there is sufficient snowmelt. The Proposed Project Alternative would not delay lake storage when sufficient snowmelt occurs in the spring and early summer. Since the Proposed Project Alternative would not represent a significant change from the Existing Condition, existing recreational use of the lake would not be affected.
Maintain current use patterns and open space on National Forest Service System lands adjacent to Valentine Reserve.	Consistent. The Proposed Project Alternative, as with other project alternatives, would continue a year-round bypass flow of 3.0 cfs out of Twin Lakes and, thereby, support the preservation value of the Valentine Reserve along the Mammoth Creek corridor as passive open space. The Proposed Project Alternative would also not impair the use of passive open space in public lands adjacent to the Valentine Reserve.
Maintain open-space areas adjacent to the Town of Mammoth Lakes for passive recreation use.	Consistent. Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions under the Proposed Project Alternative and other alternatives. Therefore, the Proposed Project Alternative would not impair the recreational value of the reserve along the Mammoth Creek corridor in the Town of Mammoth Lakes as passive open space.
Allow development of Mammoth Creek Park by the Town of Mammoth Lakes.	Consistent. Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions under the Proposed Project Alternative and other alternatives and, as such, would not impair value of the Mammoth Creek Park for recreational purposes.

Town of Mammoth Lakes General Plan

The recreation-related goals of the Town of Mammoth Lakes General Plan are focused on the development of parks and public spaces that allow for public recreation and enhance the enjoyment of the Town's natural resources. The Proposed Project Alternative would be consistent with the objective of the Town of Mammoth Lakes General Plan to maintain parks and open space within and adjacent to the town for outdoor recreation and contemplation (Goal P.1). Under the Proposed Project Alternative, Mammoth Creek hydrology would experience substantially the same flows as under the Existing Condition (assuming comparable conditions). This would contribute to the enjoyment and use of Mammoth Creek Park East, Mammoth Creek Park West, and other open space areas in the Town of Mammoth Creek adjoining the Mammoth Creek basin. As such, the Proposed Project Alternative would not impair the relationship between the recreational use of the parks and open space and the recreational use and enjoyment of Mammoth Creek. In addition, the Proposed Project Alternative would amend the authorized POU to continue to provide water service to recreation-related uses within USFS lands. A partial list of these uses includes Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park, Mammoth Lakes Pack Station, and Shady Rest Park. Therefore, this alternative would not be inconsistent with Goal P.1 of the Town of Mammoth Lakes General Plan to maintain parks within and adjacent to the town for outdoor recreation and Goal P.4 to provide and encourage a wide variety of outdoor recreation readily accessible to residents and visitors of all ages. The Proposed Project Alternative would not result in a significant detrimental impact on recreational resources addressed in this plan or impede a recreational goal of this plan. Therefore, the Proposed Project Alternative would have no impact with respect to this plan.

Town of Mammoth Lakes Draft Trail System Master Plan

The Town of Mammoth Lakes Draft Trail System Master Plan has not yet been adopted, and respective policies are tentative in nature and subject to change. As such, the comparison of the Proposed Project Alternative to the applicable near-term and long-term policies of the Draft Trail System Master Plan may also be subject to change. The recreation-related goals and policies of the Draft Town of Mammoth Lakes Trail System Master Plan are primarily focused on the development of trails and paths that encourage pedestrian and bicycle activity and connectivity. A near-term policy of the Draft Trail System Master Plan is the completion of the approximately 5.3-mile Lake Mary Road multi-use path, which runs from the town center to Horseshoe Lake in the Lakes Basin. Sections of the Lake Mary Road multi-use path, proposed for completion in late 2010, will pass through the Bodle Ditch corridor in the Lakes Basin for a combined total of approximately 0.35-mile. The Proposed Project Alternative would discontinue diversions to Bodle Ditch from Lake Mary and, thereby, would cause a potential reduction or loss of a portion of the montane riparian scrub located in the lodgepole pine forest/mixed riparian scrub along the ditch corridor (see Chapter 7 - Wildlife and Botanical Resources, in this Draft EIR). The cessation of diversion to Bodle Ditch would not affect the lodgepole pine forest or annual wildflowers along the same corridor. The Proposed Project Alternative would not impede or affect the use of the Lake Mary Road multi-use path. It was, thus, concluded that the potential reduction or loss of riparian vegetation along the multi-use path would not substantially impact the use and enjoyment of the multi-use path (see Impact Analysis, Issue 1, above). Therefore, the Proposed Project Alternative would not be inconsistent with the objective of the Draft Trail System Master Plan with respect to the Lake Mary Road multi-use path.

A long-term project under the Trail System Master Plan involves the development of a 1.06-mile multi-use path along Mammoth Creek Road. Portions of this road adjoin Mammoth Creek to the east of the Town. Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions under the Proposed Project Alternative, which would continue to support riparian vegetation and the enjoyment of Mammoth Creek from this path. Therefore, the Proposed Project Alternative would not be inconsistent with the long-term objective of the Trail System Master Plan to provide the Mammoth Creek multi-use path.

Other near-term projects envisioned under the Trail System Master Plan are the construction of future bridges across Mammoth Creek at Sherwin Street and at Waterford Avenue, and the development of a boardwalk along the existing soft-surface walking trail through Snowcreek Meadow. The Proposed Project Alternative would have no physical impact on the bridges or the boardwalk projects; and Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions under the Proposed Project Alternative, which would perpetuate the enjoyment and use of Mammoth Creek for walking, contemplation, and other recreational opportunities. As such, the Proposed Project Alternative would not impair the applicable objectives and policies of the Draft Trail System Master Plan.

Town of Mammoth Lakes Draft Parks and Recreation Master Plan

The Town of Mammoth Lakes Draft Parks and Recreation Master Plan has not yet been adopted, and respective policies are tentative in nature and subject to change. The recreation-related goals, policies, and actions of the Town of Mammoth Draft Parks and Recreation Master Plan are identical to the goals, policies, and actions of the General Plan. However, the Draft Parks and Recreation Master Plan also cites the importance of open space associated with the Mammoth Creek corridor and Valentine Reserve as an additional resource. The Proposed Project Alternative would be consistent with the applicable policies of the Draft Parks and Recreation Master Plan, since it would not impair the use and enjoyment of the Mammoth Creek corridor and Valentine for passive open space. Mammoth Creek would experience substantially the same flows as under the Existing Condition under comparable conditions under the Proposed Project Alternative, which would maintain fish habitat and riparian vegetation. In accordance with the policies of the Draft Parks and Recreation Master Plan, the Proposed Project Alternative would also not affect the use of Mammoth Creek Park. Since Mammoth Creek would continue to provide a focal point for the park and offer recreation-related opportunities, such as fishing, the Proposed Project Alternative would not adversely affect any future interpretive aquatic resources program for Mammoth Park East.

In addition, the Proposed Project Alternative would amend the authorized POU to continue to provide water service to recreation-related uses within USFS lands. A partial list of these uses, includes Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park, Mammoth Lakes Pack Station, and Shady Rest Park. Therefore, this alternative would be consistent with Goal P.1 of the Town of Mammoth Lakes Draft Parks and Recreation Master Plan to maintain parks within and adjacent to the town for outdoor recreation and Goal P.4 to provide and encourage a wide variety of outdoor recreation readily accessible to residents and visitors of all ages. The Proposed Project Alternative would not result in a significant detrimental impact on recreational resources addressed in this plan or impede a recreational goal of this plan. Therefore, the Proposed Project Alternative would have no impact with respect to this plan.

Mono County General Plan Conservation Element

The Proposed Project Alternative would be consistent with applicable objectives of the Mono County Conservation and Open Space Element to protect outdoor recreation and natural resources in unincorporated Mono County. The Proposed Project Alternative would not adversely affect wildlife and vegetation communities along Mammoth Creek to the confluence with Hot Creek, or Hot Creek to the USGS Hot Creek Flume Gage, and therefore, would conserve these natural resources. The Proposed Project Alternative would not be inconsistent with applicable objectives of the Mono County Conservation and Open Space Element to provide outdoor recreation, natural resources, and to protect animal and plant habitats. Under the Proposed Project Alternative, the fishery bypass flow requirements would continue to sustain the existing habitat for non-native trout and native Tui chub and Owens sucker in this area and the mixed willow riparian woodland along Mammoth Creek would not be adversely affected (see Chapters 6 and 7, respectively). As such, the recreational value of Mammoth Creek and Hot Creek as sport fishing destinations would not be affected. The Proposed Project Alternative would not result in a significant detrimental impact on recreational resources addressed in this plan or impede a recreational goal of this plan. Therefore, the Proposed Project Alternative would have no impact with respect to this plan.

Impact Determination 8.3.3.1-3 - Less than Significant

Mitigation Measure 8.3.3.1-3 - None Required

8.3.3.2 Environmental Impacts of the Bypass Flow Requirements Alternative No. 2 Compared to the Existing Condition

Impact Consideration 8.3.3.2-1. Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?

The Bypass Flow Requirements Alternative No. 2 would be the same as the Proposed Project Alternative with respect to the Existing Condition, except that fishery bypass flow requirements would be somewhat higher during the months of September through February. As with the Proposed Project Alternative, this change would not affect the recreational value of Mammoth Creek or the consistency of this alternative with applicable regulations, policies and plans concerning recreational resources along Mammoth Creek. Also, as with the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2 would maintain water levels in Lake Mary as required under the existing WOC, amend the WOC to allow the mandatory refill of Lake Mary by June 30 instead of June 1, cease diversion to Bodle Ditch from Lake Mary, amend the WOC regarding bypass flow requirements to Twin Falls, and provide for a year-round bypass flow requirement of 3.0 cfs in Mammoth Creek at the Twin Lakes outlet. Also, as with the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2 would modify the District's authorized POU in order to continue providing water service to ten recreation-related uses within USFS lands. Therefore, the analysis of the Proposed Project Alternative regarding Mammoth Creek, Bodle Ditch, USFS Facilities, and consistency with applicable plans and policies would apply to this alternative. As with the Proposed Project Alternative, impacts with respect to Mammoth Creek, Bodle Ditch, USFS Facilities, and consistency with applicable plans and policies would be less than significant.

However, the Bypass Flow Requirements Alternative No. 2 would differ from the Proposed Project Alternative regarding Lake Mary storage. Under the Bypass Flow Requirements Alternative No. 2, the average date on which full pool occurs would be May 21, as under the Existing Condition, compared to May 9 under the Proposed Project Alternative. The lake would reach full pool during all 20 years of the evaluation period. Drawdown of Lake Mary would reach the seasonal constraint of 3.0 ft prior to September 15 in two of the 20 years, for one day each, as under the Existing Condition, compared to one day under the Proposed Project Alternative. Because the authorized drawdown maximums under the Existing Condition do not affect access to or the enjoyment of summer and winter recreational opportunities along the shore of the lake or the recreational use of Lake Mary under the Existing Condition and the lake would reach full pool every year, and the Bypass Flow Requirements Alternative No. 2 would not exceed authorized drawdown constraints, this alternative would have a less than significant impact on the use and enjoyment of Lake Mary as a recreational resource.

Impact Determination 8.3.3.2-1 - Less than Significant

Mitigation Measure 8.3.3.2-1 - None Required

8.3.3.3 Environmental Impacts of the Permit 17332 Bypass Flow Requirements Alternative Compared to the Existing Condition

Impact Consideration 8.3.3.3-1. Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?

The features of the Permit 17332 Bypass Flow Requirements Alternative are the same as those of the Proposed Project Alternative, except that the fishery bypass flow requirements would differ. The Permit 17332 Bypass Flow Requirements Alternative has somewhat lower fishery bypass flow requirements during September through March and somewhat higher fishery bypass flow requirements during April through August compared to those of the Proposed Project Alternative. As with the Proposed Project Alternative, this change would not affect the recreational value of Mammoth Creek or the consistency of this alternative with applicable regulations, policies and plans concerning recreational resources along Mammoth Creek. Also, as with the Proposed Project Alternative, the Permit 17332 Bypass Flow Requirements Alternative would maintain water levels in Lake Mary as required under the existing WOC, amend the WOC to allow the mandatory refill of Lake Mary by June 30 instead of June 1, cease diversion to Bodle Ditch from Lake Mary, amend the WOC regarding bypass flow requirements to Twin Falls, and provide for a year-round bypass flow requirement of 3.0 cfs in Mammoth Creek at the Twin Lakes outlet. Also, as with the Proposed Project Alternative, the Permit 17332 Bypass Flow Requirements Alternative would modify the District's authorized POU in order to continue providing water service to ten recreation-related uses within USFS lands. Therefore, the analysis of the Proposed Project Alternative regarding Mammoth Creek, Bodle Ditch, USFS Facilities, and consistency with applicable plans and policies would apply to this alternative. As with the Proposed Project Alternative, impacts with respect to Mammoth Creek, Bodle Ditch, USFS Facilities, and consistency with applicable plans and policies would be less than significant.

However, the Permit 17332 Bypass Flow Requirements Alternative would differ from the Proposed Project Alternative regarding Lake Mary storage. Based on the 20-year evaluation period described in Chapter 4 - Hydrology, the average date on which Lake Mary reaches its maximum volume would be May 14 (as under the Existing Condition) for 15 out of 20 years.

Under the Permit 17332 Bypass Flow Requirements Alternative, Lake Mary does not reach full pool during the summer over the 5-year sequence of dry years under the Permit 17332 Bypass Flow Requirements Alternative. Drawdown of Lake Mary would reach the seasonal constraint of 3.0 ft prior to September 15 in seven of the 20 years. For these years, the duration (extending from April 1) ranges from 37 to 167 days, for an average of 68 days, compared to two of 20 years for one day under the Existing Condition.

Although the Permit 17332 Bypass Flow Requirements Alternative would not reach full pool during the summer season for one-fourth of the 20-year evaluation period, the alternative would not exceed the authorized drawdown of 3.0 ft prior to September 15. The authorized drawdown maximums under the Existing Condition do not affect access to or enjoyment of summer and winter recreational opportunities along the shore of the lake or the recreational use of Lake Mary under the Existing Condition. Because the authorized drawdowns do not affect the recreational use and enjoyment of Lake Mary, and the Permit 17332 Bypass Flow Requirements Alternative would not exceed authorized drawdown constraints, this alternative has a less than significant impact on the use and enjoyment of Lake Mary as a recreational resource.

Impact Determination 8.3.3.3-1 - Less than Significant

Mitigation Measure 8.3.3.3-1 - None Required

8.3.3.4 Environmental Impacts of the No Project Alternative Compared to the Existing Condition

The No Project Alternative is analyzed at the existing level of development (i.e., current utilization of permitted surface water supplies) and at a future level of development (i.e., projected utilization of permitted surface water supplies at maximum buildout in 2025) to address conditions that would reasonably be expected to occur in the foreseeable future if the proposed project were not approved. The No Project Alternative would retain the existing fishery bypass flow requirements that were implemented in 1997.

The No Project Alternative would not amend the District's authorized POU to allow entities outside the District's authorized POU that have historically received water from the District to continue receiving water. These entities would need to seek other sources of potable water, which may not be technically or financially feasible. Entities that may no longer receive District potable water service are primarily recreational uses, and include the Mill City Tract Cabins, Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park East, YMCA of Metropolitan Los Angeles Camp, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. However, the District has an existing agreement with the USFS to supply water to certain of the noted facilities for which the USFS has water rights claims. The agreement requires the provision of surface water to the District by the USFS in an amount at least equal to the annual use by its facilities. It is not confirmed that the USFS has perfected the underlying claims or permits, without which wheeling of these surface water supplies through the District's treatment and conveyance facilities cannot be done. Depending on the legal status of the USFS claims, the District may be able to continue potable water service to certain USFS uses outside the POU.

NO PROJECT ALTERNATIVE (EXISTING LEVEL OF DEMAND) COMPARED TO THE EXISTING CONDITION

Impact Consideration 8.3.3.4-1. Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?

Lake Mary

The No Project Alternative (Existing Level of Demand) would not change the existing WOCs respecting Lake Mary drawdown limitations. Existing recreational facilities and activities, such as boating, marina operation, fishing, and camping would continue as under the Existing Condition. The No Project Alternative would have no impact with respect to existing recreational resources at Lake Mary.

The No Project Alternative (Existing Level of Demand) would differ from the Existing Condition regarding Lake Mary storage. Based on the 20-year evaluation period described in Chapter 4 - Hydrology, the average date on which Lake Mary reaches its maximum volume would be May 20 for 90% of the time, compared to May 17 under the Existing Condition. The lake would reach full pool during all 20 years of the evaluation period. Drawdown of Lake Mary would reach the seasonal constraint of 3.0 ft prior to September 15 in two of the 20 years, for one day each, as under the Existing Condition. Because the authorized drawdowns under the Existing Condition do not affect access to or enjoyment of summer and winter recreational opportunities along the shore of the lake or the recreational use of Lake Mary under the Existing Condition, and the No Project Alternative (Existing Level of Demand) would not exceed authorized drawdown constraints, this alternative would have a less than significant impact on the use and enjoyment of Lake Mary as a recreational resource.

Bodle Ditch Corridor

The No Project Alternative (Existing Level of Demand) would provide for diversions to Bodle Ditch from Lake Mary. Diversions to Bodle Ditch during the summer season would maintain the existing character of Bodle Ditch corridor and would not change the value of the lodgepole pine forest/mixed riparian scrub corridor as a recreational resource. The Lake Mary Road multi-use path, which passes through the Bodle Ditch mixed riparian/lodgepole pine forest corridor for a total of approximately 0.35 mile, has the potential to be heavily used by visitors to resorts and campgrounds in the Lakes Basin as well as by hikers and cyclists from the Mammoth Lakes town center. As such, the multi-use path is considered a valued recreational resource in the region. Because the No Project Alternative would continue the existing WOCs respecting diversions to Bodle Ditch from Lake Mary, it would have no impact on the recreational value of the multi-use path.

Twin Falls

The No Project Alternative (Existing Level of Demand) would not amend the existing WOCs that require certain bypass flows to Twin Falls. As with all project alternatives, the District would comply with the fishery bypass flows and other WOCs influencing Twin Falls flows. Therefore, the flows at Twin Falls would not be significantly different from what has occurred under the Existing Condition. Therefore, this alternative would have no impact on Twin Falls as a recreational resource.

Mammoth Creek

The No Project Alternative (Existing Level of Demand) would maintain the same fishery bypass flow requirements for Mammoth Creek that have been in existence since 1997. Recreational activities, including access to and enjoyment of camping, sport fishing, hiking, biking, sight-seeing, picnicking, passive open space, and other outdoor recreational uses would continue as under the Existing Condition. As with other project alternatives, there would be a year-round bypass flow requirement of 3.0 cfs out of Twin Lakes. Therefore, the No Project Alternative (Existing Level of Demand) would have no impact on the value of Mammoth Creek recreational resource.

USFS Recreational Properties

The No Project Alternative (Existing Level of Demand) would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational uses within USFS lands, including the Mill City Tract Cabins, Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park East, YMCA of Metropolitan Los Angeles Camp, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. Because the District would not be able to serve these entities without being in violation of its SWRCB POU provisions, it is assumed that potable water service from the District would cease. Most of these entities would not be able to secure alternative water supply due to regulatory and cost constraints, resulting in the closure of or reduction in use for the affected recreational facilities. As a result, the No Project Alternative may have an impact with respect to recreational resources on USFS land.

Impact Determination 8.3.3.4-1 - Potentially Significant

Mitigation Measure 8.3.3.4-1 - No action would be taken under the No Project Alternative (Existing Level of Demand); therefore, no mitigation measures would be implemented.

Impact Consideration 8.3.3.4-2. Would the Alternative increase demand for the use of recreational resources that would require the development of alternative recreational resources, the construction of which could result in secondary physical impacts?

The No Project Alternative (Existing Level of Demand) would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational facilities within USFS lands. Entities that may not have water rights claims or permits that could be used, or the ability to resume their prior supplies, may need to secure alternate supplies. The potentially higher cost of alternate supplies could cause the closure or reduction in affected recreational facilities. The reduction in existing facilities would increase demand for alternative recreational resources, the construction of which could result in secondary physical impacts. Therefore, impacts with respect to this issue could be significant.

Impact Determination 8.3.3.4-2 - Potentially Significant

Mitigation Measure 8.3.3.4-2 - No action would be taken under the No Project Alternative (Existing Level of Demand); therefore, no mitigation measures would be implemented.

Impact Consideration 8.3.3.4-3. Would the Alternative be inconsistent with adopted plans, policies, and regulations that would impede the recreational goals of such plans and policies in a manner that would result in a significant physical impact?

Inyo National Forest Land and Resource Management Plan

The No Project Alternative (Existing Level of Demand) would not be inconsistent with the policies of the LRMP applicable to water surface levels in the Mammoth Lakes Basin for recreational use. This alternative would not change the existing WOC requirement for the filling of Lake Mary, which is entirely dependent on the timing of the natural snowmelt; and it would retain the existing fishery bypass flow requirements in Mammoth Creek that were implemented in 1997 and, thus, not impair designated open space areas. However, the No Project Existing Level of Demand Alternative would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational facilities within USFS lands. Facilities that do not have water rights claims or permits or that would be able to resume their prior supplies, would need to secure alternate supplies. The potentially higher cost of alternate supplies could cause toe closure or reduction in affected facilities. Therefore, this alternative could be inconsistent with LRMP policies to support and provide day-use activities on USFS lands within the Mammoth Lakes Basin. The impact with respect to the LRMP could be significant.

Town of Mammoth Lakes General Plan

The No Project Alternative (Existing Level of Demand) would retain the existing fishery bypass flow requirements that were implemented in 1997 and, thus, would continue to contribute to the enjoyment and use of Mammoth Creek Park in the Town of Mammoth Creek adjoining the Mammoth Creek basin and would not impair the recreation-related goals of the Town of Mammoth Lakes General Plan relative to Mammoth Creek. The fishery bypass flow requirements would not impair the respective recreational value of the park, such as fishing and observation of aquatic life. However, the No Project Alternative would not amend the authorized POU to include recreational uses within the Town of Mammoth Lakes, including Mammoth Creek Park East and Shady Rest Park, which are currently receiving potable water service from the District. However, under the No Project Alternative, the District may cease to provide potable water to recreational facilities on USFS properties outside the existing POU. Recreational facilities that do not have prior water rights claims or permits would need to secure alternate supplies. The lack of potable water service may cause the closure of some existing recreational facilities. Therefore, the No Project Alternative could be inconsistent with Goal P.1 of the Town of Mammoth Lakes General Plan to maintain parks and open space within and adjacent to the town for outdoor recreation and contemplation and Goal P.4 to provide and encourage a wide variety of outdoor recreation readily accessible to residents and visitors of all ages. The impact with respect to this plan could be significant.

Town of Mammoth Lakes Draft Trail System Master Plan

The No Project Alternative (Existing Level of Demand) would not be inconsistent with the near-term and long-term goals of the Draft Trail System Master Plan with regard to trails and bridges in the vicinity of Mammoth Creek. In addition, the No Project Alternative would continue diversions from Lake Mary to Bodle Ditch. This would ensure that riparian habitat in the vicinity of the Lake Mary Road multi-use path, and the respective recreational value of the multi-use path, would not change. The No Project Alternative would not result in a significant

detrimental impact on recreational resources addressed in this plan or impede a recreational goal of this plan. Therefore, the No Project Alternative would have no impact with respect to this plan.

Town of Mammoth Lakes Draft Parks and Recreation Master Plan

The recreation goals of the Draft Parks and Recreation Master Plan are the same as the Goals 1 through 5 under the Town of Mammoth Lakes General Plan. The No Project Alternative would retain the existing fishery bypass flow requirements that were implemented in 1997 and would not impair the recreational and open space use of the Mammoth Creek corridor and lands adjacent to the Valentine Eastern Reserve. However, the No Project (Existing Level of Demand Alternative) would not amend the authorized POU to continue providing water service to several recreational uses located on USFS lands, in and adjacent to the town, for which there are no agreements with the USFS to continue service. These including Mammoth Creek Park East, YMCA of Metropolitan Los Angeles Camp, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. Entities that may not have water rights claims or permits that could be used, or the ability to resume their prior supplies, may need to secure alternate supplies. The potentially higher cost of alternate supplies could cause the closure or reduction in affected recreational facilities. Therefore, the No Project Alternative (Existing Level of Demand) may impede a recreational goal of the Parks and Recreation Master Plan and. The impact with respect to this plan could be significant.

Mono County General Plan Conservation Element

As with the other project alternatives, the No Project Alternative (Existing Level of Demand) would not be inconsistent with applicable objectives of the Mono County Conservation and Open Space Element to protect outdoor recreation and natural resources in unincorporated Mono County. The No Project Alternative would not result in a significant detrimental impact on recreational resources in unincorporated Mono County, including Mammoth Creek Reaches D and E and Hot Creek between the confluence with Mammoth Creek and the USGS Hot Creek Flume Gage, or impede a recreational goal of this plan. Therefore, the No Project Alternative would have no impact with respect to this plan.

Impact Determination 8.3.3.4-3 - Potentially Significant with respect to the Inyo National Forest LRMP, the Town of Mammoth Lakes General Plan and the Town of Mammoth Lakes Draft Parks and Recreation Master Plan.

Mitigation Measure 8.3.3.4-3 - No action would be taken under the No Project Alternative (Existing Level of Demand); therefore, no mitigation measures would be implemented.

NO PROJECT ALTERNATIVE (FUTURE LEVEL OF DEMAND) COMPARED TO THE EXISTING CONDITION

Impact Consideration 8.3.3.4-4. Would the Alternative result in a substantial detrimental physical change in an existing recreational resource that would affect the use and enjoyment of the resource?

Lake Mary

The No Project Alternative (Future Level of Demand) would not change the existing WOCs regarding Lake Mary drawdown limitations. No Project Alternative (Future Level of Demand) could result in potentially earlier maximum drawdown of 3.0 ft in Lake Mary prior to

September 15. However, as discussed in Chapter 4 - Hydrology, projections extending to 2025 would not cause changes in the maximum level of Lake Mary, or maximum drawdown (prior to September 15, and year-round) of Lake Mary WSELs. Statistically significant differences would not occur for the date on which maximum storage is obtained during the spring (April – June). Since the No Project Alternative would not cause greater drawdown than under the Existing Condition, this alternative would not change conditions in Lake Mary that would impact the value of Lake Mary as a recreational resource.

The No Project Alternative (Future Level of Demand) would differ from the Existing Condition regarding Lake Mary storage. Based on the 20-year evaluation period described in Chapter 4 - Hydrology, the average date on which Lake Mary reaches its maximum volume would be May 20 for 90% of the time, compared to May 17 under the Existing Condition. The lake would reach full pool during all 20 years of the evaluation period. Drawdown of Lake Mary would reach the seasonal constraint of 3.0 ft prior to September 15 in two of the 20 years, for one day each, as under the Existing Condition. Because the authorized drawdowns under the Existing Condition do not affect access to or enjoyment of summer and winter recreational opportunities along the shore of the lake or the recreational use of Lake Mary under the Existing Condition, and the No Project Alternative (Existing Level of Demand) would not exceed authorized drawdown constraints, this alternative would have a less than significant impact on the use and enjoyment of Lake Mary as a recreational resource.

Bodle Ditch Corridor

As is the case with the No Project Alternative (Existing Level of Demand), the No Project Alternative (Future Level of Demand) would provide for diversions to Bodle Ditch from Lake Mary. Because the No Project Alternative (Future Level of Demand) would continue the existing WOCs with regard to diversions to Bodle Ditch from Lake Mary, it would have no impact on the recreational value of the multi-use path adjacent to the ditch corridor.

Twin Falls

As is the case with the No Project Alternative (Existing Level of Demand), the No Project Alternative (Future Level of Demand) would not amend the existing WOCs that require certain bypass flows to Twin Falls. The District would comply with the fishery bypass flows and other WOCs. Therefore, the flows out of Lake Mamie to Twin Falls would not be significantly different from what has occurred under the Existing Condition. Therefore, this alternative would have no impact on Twin Falls as a recreational resource.

Mammoth Creek

The No Project Alternative (Future Level of Demand), compared to the Existing Condition, could result in a minor reduction of flow in Mammoth Creek. However, as discussed in Chapter 4 - Hydrology, substantial differences would not occur between the No Project Alternative (Future Level of Demand) and the Existing Condition regarding the magnitude, frequency, duration, timing and rate of change of hydrologic conditions in Mammoth Creek at the OMR and OLD395 Gage, or in Hot Creek at the USGS Hot Creek Flume Gage. Chapter 6 - Fisheries and Aquatic Resources, concludes that the No Project Alternative (Future Level of Demand) would not significantly change the relationships between flow variability and associated trends in annual brown trout total population abundance or result in a reduce ability of the No Project Alternative (Future Level of Demand) to maintain fisheries. Therefore, the No Project

Alternative would have a less than significant impact on the value of Mammoth Creek and Hot Creek as recreational resources.

USFS Recreational Properties

As is the case with the No Project Alternative (Existing Level of Demand), the No Project Alternative (Future Level of Demand) would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational uses within USFS lands, including the Mill City Tract Cabins, Twin Lakes Campground, Sherwin Creek Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park East, YMCA of Metropolitan Los Angeles Camp, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, Tamarack Lodge, and Shady Rest Park. Most of these entities possess water rights claims in the Mammoth Creek watershed, and historically these customers supplied themselves with water using their own treatment systems. Because the District would not be able to serve these entities, it is assumed that potable water service from the District would cease. Some of these entities may not have water rights claims or permits that could be used or the ability to resume their prior supplies. The potentially higher cost of alternate supplies could cause the closure or reduction in affected recreational facilities. As a result, the No Project Alternative (Future Level of Demand) may have an impact with respect to recreational resources on USFS land.

Impact Determination 8.3.3.4-4 - Potentially Significant.

Mitigation Measure 8.3.3.4-4 - No action would be taken under the No Project Alternative (Future Level of Demand); therefore, no mitigation measures would be implemented.

Impact Consideration 8.3.3.4-5. Would the Alternative increase demand for the use of recreational resources that would require the development of alternative recreational resources, the construction of which could result in secondary physical impacts?

The No Project Alternative (Future Level of Demand) would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational facilities within USFS lands. Entities that may not have water rights claims or permits that could be used, or the ability to resume their prior supplies, may need to secure alternate supplies. The potentially higher cost of alternate supplies could cause the closure or reduction in affected recreational facilities. The reduction in existing facilities would increase demand for alternative recreational resources, the construction of which could result in secondary physical impacts. Therefore, impacts with respect to this issue could be significant.

Impact Determination 8.3.3.4-5 - Potentially Significant.

Mitigation Measure 8.3.3.4-5 - No action would be taken under the No Project Alternative (Existing Level of Demand); therefore, no mitigation measures would be implemented.

Impact Consideration 8.3.3.4-6. Would the Alternative be inconsistent with adopted plans, policies, and regulations that would impede the recreational goals of such plans and policies in a manner that would result in a significant physical impact?

Compared to the No Project Alternative (Existing Level of Demand), the No Project Alternative (Future Level of Demand) would result in a minor reduction of flow in Mammoth Creek and a potentially earlier maximum drawdown of 3.0 ft in Lake Mary prior to September 15. However, as discussed in Chapter 4 - Hydrology, there are no significant differences between the No Project Alternative (Future Level of Demand) and the Existing Condition regarding the magnitude, frequency, duration, timing and rate of change of hydrologic conditions in

Mammoth Creek. The No Project Alternative (Future Level of Demand) would not change the maximum level of Lake Mary. The No Project Alternative (Future Level of Demand) would not significantly change the relationships between flow variability and associated trends in annual brown trout total population abundance or result in a reduce ability of the No Project Alternative (Future Level of Demand) to maintain fisheries. Therefore, the No Project Alternative (Future Level of Demand) would not be inconsistent with the recreation-related policies of the LRMP, the Town of Mammoth Lakes General Plan, the Draft Parks and Recreation Master Plan, or the Mono County General Plan. The No Project Alternative (Future Level of Demand) would not cease diversion to Bodle Ditch and would have no impact with respect to conditions along the Lake Mary Road multi-use path in the vicinity of Bodle Ditch. As such, the No Project Alternative (Future Level of Demand) would have no impact with respect to the Draft Trails System Master Plan.

However, as with the No Project Alternative (Existing Level of Demand), the No Project Alternative (Future Level of Demand) would not amend the District's existing authorized POU to allow continuation of potable water service to existing recreational facilities within USFS lands. Facilities that do not have water rights claims or permits or that would be able to resume their prior supplies, would need to secure alternate supplies. The potentially higher cost of alternate supplies could cause the closure or reduction in affected facilities. Therefore, this alternative could be potentially inconsistent with LRMP policies to support and provide day-use activities on USFS lands within the Mammoth Lakes Basin and goals of the Town of Mammoth Lakes General Plan and Draft Parks and Recreation Master Plan to maintain parks and open space adjacent to the town and available to a range of residents and visitors. The impact with respect to these plans could be significant.

Impact Determination 8.3.3.4-6 - Potentially Significant with respect to the Inyo National Forest LRMP, the Town of Mammoth Lakes General Plan and the Town of Mammoth Lakes Draft Parks and Recreation Master Plan.

Mitigation Measure 8.3.3.4-6 - No action would be taken under the No Project Alternative (Future Level of Demand); therefore, no mitigation measures would be implemented.

8.4 MITIGATION MEASURES

No significant impacts to recreational resources would occur under the Proposed Project Alternative, Bypass Flow Requirements Alternative No. 2, and Permit 17332 Bypass Flow Requirements Alternative. Therefore, no mitigation measures are required with respect to these alternatives.

Potentially significant impacts identified under the No Project Alternative (existing and future demand levels) would not be addressed by mitigation measures, since no action or mitigation is associated with this alternative.

8.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potentially significant impacts to existing recreational facilities on USFS land under the No Project Alternative (existing and future demand levels) would occur if the existing POU were not amended to allow continued water service to 10 recreational uses on USFS lands. These impacts would not be addressed by mitigation measures since "No Project" is a "no action" alternative. Therefore, potentially significant impacts that would occur under the No Project Alternative (existing and future demand levels) would remain significant and unavoidable.

8.6 CUMULATIVE IMPACTS

8.6.1 QUALITATIVE AND QUANTITATIVE ASSESSMENT OF POTENTIAL CUMULATIVE IMPACTS

The assessment of cumulative impacts, including the direct and indirect effects of the Proposed Project Alternative or other project alternative, focuses on those impacts that, when considered alone, would not be deemed a significant impact, but when considered in addition to the impacts of related projects in the area, would be considered "cumulatively considerable" and significant. Related projects are (recently) past, current, and probable future projects within the area of influence of the Proposed Project Alternative and other project alternatives. The Mammoth Creek Basin, including the Town of Mammoth Lakes and the area of incorporated Mono County in the vicinity of Mammoth Creek and Hot Creek, provides the context for the cumulative impact analysis. Respective impacts on recreational resources outside the Mammoth Creek Basin would not be considered cumulatively significant because of their distance from the area of influence. Cumulative impacts would derive from the combination of the impacts associated with the Proposed Project Alternative or other project alternatives and related projects. The Proposed Project Alternative under the future level of demand represents the Proposed Project Alternative at buildout (2025) (a future condition) and, as such, is considered a related project. Cumulative impacts would result from the potential diminishment of recreational resources, as identified in this chapter, or the development of uses that would diminish the opportunity to develop future recreational facilities. Impacts could involve either the loss of resources or increased demand for recreational resources to the extent that existing facilities would not be available to accommodate demand. Such demand would be regulated or encouraged through applicable plans and policies including the following:

- Inyo National Forest Land and Resources Management Plan
- 2007 Town of Mammoth Lakes General Plan
- Town of Mammoth Lakes Draft Trail System Master Plan
- Town of Mammoth Lakes Draft Parks and Recreation Master Plan
- Mono County General Plan
- Inyo National Forest Recreation Site Facility Master Planning

Cumulative Impact Consideration 8.6.1-1. Would the project alternatives, when combined with related projects, cause the diminishment of recreational resources or the development of uses that would diminish the opportunity to develop future recreational facilities?

Inyo National Forest LRMP

The U.S. Forest Service's Inyo National Forest LRMP contains policies that would encourage the preservation or expansion of recreational resources. No development projects are anticipated under this plan for the Lakes Basin or the Mammoth Creek corridor. However, specific projects anticipated by the USFS include USFS applications for storage at Lake Mamie and Twin Lakes. These include applications for water right permits to confirm the installation of dams that were installed in 1968 in Lake Mamie and 1953 in Twin Lakes. These applications are to confirm historic operations and would continue any existing recreational benefits associated with these lakes. However, these actions would have no impact on recreational resources or cumulative impacts in combination with the Proposed Project Alternative or other project alternatives.

Town of Mammoth Lakes General Plan

The 2007 Town of Mammoth Lakes General Plan contains policies to ensure that park development and acquisition is prioritized and planned in concurrence with development and that establishment of joint-use facilities is maximized. However, demand under the General Plan build-out could result in the need for an additional 22 acres of park and recreational facilities to maintain existing performance objectives of parkland per population. Since it is uncertain where additional acres would be provided, the impact of the General Plan on existing recreational resources is considered significant and unavoidable.

Conversely, the Proposed Project Alternative and other project alternatives would support recreational resources in the Mammoth Creek Basin by continuing required water level requirements at Lake Mary and continuing fishery bypass flow requirements for Mammoth Creek. Although flows in Mammoth Creek would be less under the Proposed Project Alternative at future level of demand, Chapter 4 - Hydrology, concludes that substantial differences would not occur between the Proposed Project Alternative at future level of demand and the Existing Condition. In addition, the Proposed Project Alternative, Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Alternative would amend the District's authorized POU to continue to provide water service to recreational uses located on USFS properties outside the authorized POU and, thereby, support the recreational resources of the area.

Although it is estimated that the 2007 General Plan could result in additional demand for recreational land that increases demand for the use of recreational resources and potentially results in a significant impact, because the Proposed Project Alternative and other project alternatives would support recreational facilities, no cumulative impacts would occur as a result of the combination of the General Plan build-out and the project alternatives.

Town of Mammoth Lakes Draft Trail System Master Plan

The Town of Mammoth Lakes Draft Trail System Master Plan proposes the development of the approximately 1.06-mile Mammoth Creek Path on or adjacent to Mammoth Creek Road in the proximity of Mammoth Creek. The Proposed Project Alternative and other project alternatives would not cause any changes to the Mammoth Creek corridor that would impede or impact the development of this future trail.

The Draft Trails Master Plan provides for the 5.3-mile Lake Mary Road multi-use path, which intersects or parallels upper Bodle Ditch for a combined total of 0.35 mile. As discussed above in Section 8.3, Environmental Consequences, the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would eliminate the existing diversion of water to Bodle Ditch from Lake Mary and potentially affect the riparian vegetation that currently exists along some sections of the ditch in the vicinity of the path. The variety of vegetation along the path may enhance the recreational experience of path users. Under these project alternatives, monitoring of vegetation and the provision of adaptive management under the RWMAMP would respond to signs of vegetation loss. As a consequence, these project alternatives would not cumulatively impact the character of the plant communities along the Bodle Ditch corridor. No potential impacts or cumulative impacts to the riparian community would occur under the No Project Alternative.

The Draft Trail System Master Plan also anticipates the use of a low wooden boardwalk in the proximity of Mammoth Creek on the walking trail through Snowcreek Meadow to prevent trail braiding. In some sections close to the creek, the footpath occasionally fills with water and

causes users to walk off the trail and create adjacent paths. Since the policy of the Trail System Master Plan is to prevent or reduce existing damage to along this trail corridor, the plan would enhance this recreational resource. Because the project alternatives would have no impact on the recreational value of the Town's trails, no cumulative impacts on these recreational resources are anticipated.

Town of Mammoth Lakes Draft Parks and Recreation Master Plan

Policies of the Town of Mammoth Lakes Draft Parks and Recreation Master Plan are to preserve open space in and adjacent to the town's municipal boundary and to expand some park facilities. Areas of preservation for passive open space include the Town's existing easements along Mammoth Creek to the east of the Valentine Reserve, expanded open space easements (not yet determined), and the open space associated with the Valentine Reserve. The intention of the Draft Parks and Recreation Master Plan is to address community concerns regarding the preservation and enhancement of the natural, scenic and recreational value of the Mammoth Creek corridor.

The only development proposed under the Draft Parks and Recreation Master Plan in the Mammoth Creek corridor is associated with the expansion of uses and services at Mammoth Creek Park East and upgrading of existing play equipment at Mammoth Creek Park West. Expansion in Mammoth Creek Park East is associated with the use of the area for open space uses such as soccer fields, outdoor venues, picnicking, fishing and other activities. Shady Rest Park is also included in upgrades proposed under the Parks and Recreation Master Plan. These include expanded parking, rehabilitated fields, upgraded playground equipment and other recreational uses. The implementation of these policies would result in the potential improvement of the town's recreational resources, and in combination with any of the project alternatives, would have no impact on recreational resources within the Town of Mammoth Lakes. The No Project Alternative would result in a potentially significant impact to recreational resources if the POU were not extended to allow the District's continued water service to recreational uses on USFS lands, including Mammoth Creek Park East and Shady Rest Park. However, since the Draft Parks and Recreation Master Plan would not result in any impact to recreational resources, it would not cumulative contribute to the potentially significant impact under the No Project Alternative. In addition, the Draft Parks and Recreation Master Plan would have no impact with respect to potential future Mammoth Creek bypass flows under the No Project Alternative at future level of demand and the Proposed Project Alternative at future level of demand. Therefore, the Draft Parks and Recreation Master Plan would not cumulative contribute to changes that would occur under any project alternatives.

Mono County General Plan

The lower reaches of the Mammoth Creek Basin are located in unincorporated Mono County and subject to land use regulations of the Mono County General Plan. Mandatory General Plan actions include providing outdoor recreation and preserving natural resources. The General Plan identifies recreational fishing industry as an important recreational and economic resource in Mono County. The policies of the General Plan would preserve recreational resources and promote recreational facilities outside community areas for both residents and visitors. In addition, General Plan policies would provide connections and trail links between communities and various recreation areas; propose the more efficient use of existing recreation areas and facilities; and generally intend to prevent activities that would diminish or impact recreational resources. The Proposed Project Alternatives and other project alternatives would support recreational resources in unincorporated Mono County, including continuing to supply water to

Sherwin Creek Campground and to support fisheries. The No Project Alternative would potentially result in a significant impact to recreational resources if the POU were not extended to allow the District's continued water service to recreational uses on recreational sites within unincorporated Mono County, including the Sherwin Creek Campground. However, since the Mono County General Plan would not result in any impact to recreational resources, it would not cumulative contribute to the potentially significant impact under the No Project Alternative.

In addition, the Mono County General Plan would have no impact with respect to potential future Mammoth Creek bypass flows under the No Project Alternative at future level of demand and the Proposed Project Alternative at future level of demand. Because the Proposed Project alternatives would support recreational resources, as would the Mono County General Plan, and would not cumulative contribute to changes that would occur under any project alternatives, no cumulative impacts are anticipated with regard to recreational resources in unincorporated Mono County.

Inyo National Forest Recreation Site Facility Master Planning Analysis

The USFS is reviewing more than 200 developed recreation sites across the Inyo National Forest through a process called "Recreation Site Facility Master Planning" (RSFMP) (USFS 2007). Many of the USFS facilities were built 30 to 50 years ago, and have reached the end of their useful life without significant deferred maintenance investment (USFS 2007). Other facilities receive no or little use, and no longer serve the demand that existed 30 to 50 years ago. This process will allow the USFS to provide the better forest-specific recreation opportunities. As part of the RSFMP, this study will look at the operation and maintenance of the campgrounds, picnic areas, trailheads, boat ramps, visitor centers, and other facilities in the Inyo National Forest to assure that current and future visitor and community recreation needs are met (USFS 2007). The implementation of the RSFMP would have not adversely impact recreational resources and would not cumulative contribute to any impacts associated with the project alternatives.

Proposed Project Alternative Future Level of Demand

The Proposed Project Alternative Future Level of Demand relates to water demands at projected Town buildout (2025). As discussed in Chapter 4 - Hydrology, projections extending to 2025 would not cause changes in the maximum level of Lake Mary, or maximum drawdown (prior to September 15, and year-round) of Lake Mary WSELs. Statistically significant differences would not occur for the date on which maximum storage is obtained during the spring (April – June). Because the Proposed Project Alternative Future Level of Demand would not change maximum drawdown levels at Lake Mary, it would not change recreational conditions at Lake Mary or contribute to cumulative impacts that would diminish the use of Lake Mary as a recreational resource.

The Proposed Project Alternative Future Level of Demand would not change the less than significant impacts to the Lake Mary Road multi-use path in the vicinity of Bodle Ditch or cause change flows in Twin Falls that would be significantly different from what has occurred under the Existing Condition. Therefore, the Proposed Project Alternative Future Level of Demand, would not cause a cumulative impact to these recreational resources.

Water levels in Mammoth Creek and Hot Creek under the Proposed Project Alternative Future Level of Demand would be reduced compared to the Existing Condition. However, Chapter 4 - Hydrology, concludes that substantial differences would not occur between the Proposed Project Alternative Future Level of Demand and the Existing Condition regarding the magnitude, frequency, duration, timing and rate of change of hydrologic conditions in

Mammoth Creek at the OMR and OLD395 Gage, or in Hot Creek at the USGS Hot Creek Flume Gage. Chapter 6 - Fisheries and Aquatic Resources, concludes that the Proposed Project Alternative Future Level of Demand would not significantly change the relationships between flow variability and associated trends in annual brown trout total population abundance or result in a reduce ability of the Proposed Project Alternative Future Level of Demand to maintain fisheries. Because flows in Mammoth Creek and Hot Creek under the Proposed Project Alternative Future Level of Demand and recreational fishing opportunities within these in creeks would be similar to the Existing Condition, the Proposed Project Alternative Future Level of Demand would not contribute to cumulative impacts that would diminish the use of these creeks as recreational resources.

Cumulative Impact Determination 8.6.1-1 - Less than Significant

Mitigation Measure 8.6.1-1 - None Required

No potentially significant adverse impacts to recreational resources would occur under any of the related projects or as a result of the combination of related projects. Thus, the Proposed Project Alternative would not have an incremental effect singularly or in combination with related projects that is "cumulatively considerable."