

MAMMOTH BASE LAND EXCHANGE

Purpose and Need Statement

and

Proposed Action

Background:

The Inyo National Forest first accepted the proposal for the Mammoth Base Land Exchange in 2011. However, in 2012 work on the exchange was placed on hold because existing law did not allow for a cash equalization to exceed 25 percent of the appraised value of the federal land or acquisition of parcels outside the National Forest System (NFS) boundary. Legislation was required to allow the exchange to move forward. The current legislation allows for acquisition of parcels outside the National Forest System (NFS) boundary, located in either Inyo or Mono counties, to be used for administrative purposes, and waives the requirement that cash equalization not exceed 25 percent of the appraised value of the federal land. This legislation was passed as part of the “National Defense Appropriations Act for Fiscal Year 2015” (NDAA), P.L. 113-291, Section 3005 in December 2014, permitting the exchange to move forward once again. This notice reflects the provisions of the NDAA and other changes to the exchange proposal that have occurred since 2011.

Purpose & Need:

The Mammoth Main Lodge Redevelopment LLC, a legal entity closely related to Mammoth Mountain Ski Area LLC (hereafter collectively referred to as “proponent” or “MMSA”), owns facilities located within the Town of Mammoth Lakes, California, municipal boundary. These facilities are described in a Ski Area Term Special Use Permit (the Permit) from the Inyo National Forest. MMSA proposes to acquire approximately 30.6 acres of NFS lands (the Federal parcels), currently occupied by tourism-related facilities at the main base of its ski area and nearby sewage treatment ponds. The Federal parcels are an island of intensely developed urban landscape retaining few natural characteristics and features consistent with its status as NFS lands. In exchange, MMSA would convey approximately 1,317.5 acres of land (the non-Federal parcels) in Mono, Inyo, Plumas and Tuolumne Counties, California, to the United States to be administered as NFS lands.

Purpose of the Land Exchange:

The purpose of this land exchange is twofold:

- To acquire environmentally sensitive lands and an administrative site to better meet resource and other management goals of the NFS as outlined in the respective Land and Resource Management Plans of the National Forests involved in this exchange; and
- To exchange developed lands in the NFS that encumber adequate management by the United States Forest Service (USFS) and would better serve the community and economic needs of the Town of Mammoth Lakes and Mono County in private ownership.

Need Statement Number 1: Improve the management of natural resources and provide opportunities for public use consistent with the *1988 Inyo National Forest Land and Resource Management Plan*. Through this exchange, the USFS seeks to acquire and protect cultural, natural, and recreational resources present within all the non-Federal parcels. Additionally, wetland and riparian habitat are present in the non-Federal parcels of Taylor Lake, Dexter Canyon and a portion of the Clavey River parcels that contain either frontage on a perennial

stream or are on the headwater areas of a perennial stream. These areas are identified as priorities for acquisition through land exchanges in the *1988 Inyo National Forest Land and Resource Management Plan* and would facilitate greater adherence to the standards and guidelines outlined by the Land and Resource Management Plans of the Stanislaus and Plumas National Forests (further described under the Land and Resource Management Direction heading).

In addition, this proposed exchange meets the intent of 36 CFR 254.3(b) through the acquisition of:

- Private parcels that would result in increased management efficiency by consolidating landownership;
- Key private inholdings within or adjacent to important management areas such as federally-designated wilderness;
- Known habitat for critical species; and
- Protection of aesthetic values through acquisition of lands within the Mono Basin Scenic Area.

Need Statement Number 2: Acquire administrative lands meeting the needs of the Inyo National Forest for storage of vehicles and materials, and other support for operations of the Forest and its subordinate Ranger Districts. Furthermore, acquisition of the Bishop administrative site would eliminate the need for a long-term lease.

Need Statement Number 3: Improve visitor experiences at Mammoth Mountain Ski Area by improving management capabilities of the Federal parcels, which would be better executed under private ownership. Future conditions of the Federal parcels proposed for exchange are anticipated to result in greater management challenges under the direction provided by the *1988 Inyo National Forest Land and Resource Management Plan*.

Need Statement Number 4: Meet the economic needs and enhance future community development of the Town of Mammoth Lakes and Mono County, California.

Need Statement Number 5: Transfer land ownership of existing human wastewater treatment systems, which are connected to MMSA base facilities and located on the Federal parcels. These sewage ponds were constructed to receive and treat sewage from various MMSA facilities including the Mammoth Mountain Inn, Yodler, Main Lodge, McCoy Station, and the Mill. The adjacent Mammoth Mountain Chalet Association (under Forest Service special use authorization) also utilizes these ponds for sewage disposal. Adequate management direction for a system serving a mix of private and permitted facilities is not included in the *1988 Inyo National Forest Land and Resource Management Plan*, limiting the ability of the USFS to maintain the sewage ponds in a way that is compatible with appropriate uses of NFS lands. As stated in 36 CFR part 251, which outlines *Land Use* on NFS land, “Any municipal watershed management agreements, special use authorizations, requirements, and/or restrictions shall be consistent with forest plans, or amendments and revisions thereto”. As such, Federal guidance would imply that management of the sewage ponds could be better accommodated on private land.

Proposed Action:

The Proposed Action is to complete a land exchange pursuant to Section 206 of the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. 1716. Under the Proposed Action, the United States would convey approximately 30.6 acres of NFS lands within the boundaries of the Inyo

National Forest, and currently managed as part of a Ski Area Term Special Use Permit to MMSA. In exchange, MMSA would convey to the United States approximately 1,317.5 acres of privately owned lands (“inholdings”) located within the boundaries of the Inyo, Plumas and Stanislaus National Forests and one small parcel (approximately 1.66 acres) in Inyo County, California that is outside the boundaries of the Inyo National Forest.

Federal Lands

Under the Proposed Action, two Federal parcels located within the municipal boundary limits of the Town of Mammoth Lakes – totaling approximately 30.6 acres – would be transferred to MMSA. If the land exchange is implemented, the transferred land would be an island of non-Federal land surrounded by NFS lands. Currently, the Federal parcels are Reserved Public Domain that has never left Federal ownership. The Federal parcels include an intensely developed tract containing structures that provide lodging and visitor services facilities at the main base area for the Mammoth Mountain Ski Area, and an adjacent tract containing sewage ponds that receive and treat sewage from various MMSA facilities. The facilities on and served by these tracts include the Mammoth Mountain Inn, the Yodler Restaurant, two ski lift bases, a snowmobile and snow cat rental and tour service, wastewater treatment ponds and several parking areas. Redevelopment of the base area currently on Federal lands would be a Reasonably Foreseeable Future Action if the exchange were to be approved. The Federal parcels are located adjacent to California State Highway 203, approximately four miles west of the town center of Mammoth Lakes.

**Table 1:
Federal Parcels Involved in the Exchange**

Parcel ID	Parcel Name	National Forest	County	Survey Acreage
A	MMSA Base Main Lodge	Inyo	Mono	20.6
B	Sewage Ponds	Inyo	Mono	10.0
Total Acreage of Federal Parcels A & B				30.6

Non-Federal Lands

Under the Proposed Action, 12 non-Federal parcels – totaling approximately 1,317.5 acres – would be transferred to the United States, to be managed by the USFS. Certain parcels have been identified as needing remedial work in order to be considered acceptable for exchange and future management by the USFS. Prior to United States acquisition, the non-Federal party is responsible for completing the necessary remediation, which thus far includes the removal of infrastructure and materials that reduce the natural integrity of the identified parcels. Additional remediation may be required following completion of the Phase I/Phase II Environmental Site Assessment. These parcels are listed in the following table.

**Table 2:
Non-Federal Parcels Involved in the Exchange**

Parcel ID	Parcel Name	National Forest	County	Remediation Necessary (Y/N)	Survey Acreage
1	West Mono Lake	Inyo	Mono	Y	118.3
2	DWP-Bishop	Outside Inyo	Inyo	N	1.7
3	Pine Creek	Inyo	Inyo	Y	10.0
4	Dexter Canyon II	Inyo	Mono	N	84.3
5	Moran Springs	Inyo	Mono	N	80.0
6	Madden Property	Inyo	Mono	N	2.7
7	May Lundy Mining Claim	Inyo	Mono	N	20.6
8	Clavey River Parcel #1	Stanislaus	Tuolumne	N	149.3
9	Clavey River Parcel #2	Stanislaus	Tuolumne	N	120.0
10	Clavey River Parcel #3	Stanislaus	Tuolumne	N	640.0
11	Clavey River Parcel #4	Stanislaus	Tuolumne	N	10.7
12	Taylor Lake	Plumas	Plumas	Y	80.0
Total Acreage of Non-Federal Parcels 1 through 12					1,317.5

Six of the non-Federal parcels are located inside the boundaries of the Inyo National Forest. These parcels include the West Mono Lake Parcel (located inside the boundaries of the Congressionally designated Mono Basin National Forest Scenic Area near the west shore of Mono Lake), the May Lundy Mining Claim Parcel (patented mining claims located in or adjacent to the Hoover Wilderness northwest of Mono Lake), the Moran Springs Parcel (located in the Benton Range), Dexter Canyon II Parcel (a large inholding southeast of Mono Lake), Madden Property Parcel (adjacent to Lake Mary Road in the Town of Mammoth Lakes), and the Pine Creek Parcel (located at the trailhead of the Pine Canyon Trail).

The non-Federal parcel located outside the boundaries of the Inyo National Forest is located in Inyo County. The Los Angeles Department of Water and Power (DWP)-Bishop Parcel is located in the City of Bishop, California, adjacent to the White Mountain Ranger District Office of the Inyo National Forest. The DWP-Bishop Parcel is used to store vehicles and large service items for the management of programs of the Inyo National Forest.

One of the non-Federal parcels (Taylor Lake Parcel) is located inside the boundaries of the Plumas National Forest at Taylor Lake east of Greenville, California. This parcel includes most of the shoreline of Taylor Lake and offers outstanding recreational values as well as habitat for wetland species of plants and animals.

Four of the non-Federal parcels are located inside the boundaries of the Stanislaus National Forest in the Clavey River watershed near Yosemite National Park. All four parcels contain either frontage on a perennial stream or headwaters areas for a perennial stream and all four eliminate islands of private lands in the Stanislaus National Forest.

Land and Resource Management Plan Direction:

The proposed land exchange would be consistent with the direction provided in each of the Land and Resource Management Plans for the three National Forests involved in the exchange. Although the Inyo National Forest is the only National Forest disposing of Federal parcels, the non-federal parcels that would be acquired by the Stanislaus National Forest and the Plumas National Forest are consistent with their respective Land and Resource Management Plans.

Inyo National Forest Land and Resource Management Plan

Forest-wide standards and guidelines for *Lands* as stated on p.80-81 of the *1988 Inyo National Forest Land and Resource Management Plan* identify desirable conditions of parcels to be involved in an exchange.

Landownership Adjustments- Acquire lands by exchange, purchase, or donation in the following priority:

- 1. Highest priority: a. lands with water frontage such as lakes, streams, floodplains, wetlands, and riparian zones; b. key game management areas and lands having endangered or threatened fish, wildlife, or plant habitat; c. lands needed to reduce fire risks; d. lands needed to prevent soil erosion; e. lands and easements that ensure access to public lands and resources; f. lands having unique historical or cultural resources; g. wilderness inholdings.*
- 2. Moderate priority: a. lands primarily of value for outdoor recreation purposes and lands needed for aesthetic purposes; b. lands needed for administrative purposes.*
- 3. Lowest priority: b. lands needed to consolidate existing blocks of National Forest lands to improve administration of the area.*

As highlighted in the Purpose and Need and the Proposed Action, non-Federal parcels that would be acquired in the proposed exchange fit into areas that the *1988 Inyo National Forest Land and Resource Management Plan* standards and guidelines identify as high to moderate priority for acquisition.

Additionally, the following direction is provided for the disposal of Federal parcels.

Dispose of lands by exchange in the following priority:

- 1. Tracts inside or adjacent to communities when such tracts would enhance community development and reduce use conflicts, provided that suitable private land is not available. Coordinate National Forest System plans for land adjustments with the Bureau of Land Management, county and community general plans.*
- 2. Lands under special use permit within or adjacent to cities that would be better suited for private ownership.*
- 3. Small federal parcels that are intermingled with other non-federal parcels.*

Both the Purpose and Need and the Proposed Action identify that the conditions and current management of the Federal parcels proposed for exchange align with the standards and

guidelines for disposal of lands as outlined in the *1988 Inyo National Forest Land and Resource Management Plan*.

Stanislaus National Forest 2010 Forest Plan Direction

As stated in the proposed action, four of the non-Federal parcels that would be acquired in the proposed exchange are located within the boundaries of the Stanislaus National Forest in the Clavey River watershed. In their current state, these four parcels create islands of Private land. Consistent with the following forest-wide direction for *Lands* on p. 41 of the *Stanislaus National Forest 2010 Forest Plan Direction*, the acquisition of these four parcels would eliminate islands of private land.

Consolidate private and National Forest landownership within Management Areas.

The four Clavey river parcels would be located in the Management Area of *Wild and Scenic Rivers and Proposed Wild and Scenic Rivers* and contain either frontage on a perennial stream or headwaters areas for a perennial stream. Land in this area of the Stanislaus National Forest is managed to:

Preserve the notable values or features as part of, or for eventual inclusion in, the National Wild and Scenic River System.

Consolidating landownership in the Management Area of *Wild and Scenic Rivers and Proposed Wild and Scenic Rivers* of the Stanislaus National Forest through the acquisition of these four parcels would improve management capabilities and ensure adherence to standards and guidelines.

Plumas National Forest Land and Resource Management Plan

According to the forest-wide standards and guidelines stated on p. 4-51 of the *1988 Plumas National Forest Land and Resource Management Plan*, landownership adjustment is to adhere to the following:

Accomplish ownership adjustment that maintains timber productivity and that consolidates lands, or results in acquisition of Wild and Scenic River lands, Threatened or Endangered Species habitat critical deer range, critical rangeland watering sources, or areas crucial to recreation management.

The Taylor Lake parcel, which would be acquired by the Plumas National Forest in the proposed exchange, is identified in the *1988 Plumas Land and Resource Management Plan* as having outstanding recreational values as well as habitat for wetland species of plants and animals. These qualities are described under Management Area 29, which states:

Maintain the scenic and geologic values of the Kettle Rock – Taylor Lake area. Attempt to acquire private lands.

Decision Framework (Decision to be Made):

Based on the environmental analysis produced by the Team, the Forest Supervisors will decide whether the Proposed Action will proceed as proposed or in a modified state, if an alternative action is necessary to address issues that may be brought forward by the public, or if no action will take place at all. The Forest Service decision would apply only to the exchange of Federal

and non-Federal parcels. If an exchange is approved, the Forest Service would have no jurisdiction of private lands and potential development of those lands.