Reds Meadow Road Improvements Project
Final Environmental Assessment with Finding of No Significant Impact and Initial Study with Mitigated Negative Declaration

FTFS 03S11(1)

Prepared for the Federal Highway Administration,
Central Federal Lands Highway Division
Lakewood, Colorado

March 2018

U.S. Department of Transportation
Federal Highway Administration
Central Federal Lands Highway Division

and

THE TOWN OF MAMMOTH LAKES

In Cooperation with
U.S. Forest Service

FINAL ENVIRONMENTAL ASSESSMENT WITH FINDING OF NO SIGNIFICANT IMPACT AND INITIAL STUDY WITH MITIGATED NEGATIVE DECLARATION

Submitted Pursuant to:

(Federal) 42 U.S.C. 4332(2)(c)
(State) Division 13, California Public Resources Code

For

Reds Meadow Road Improvements Project
FTFS 03S11(1)
Madera County, CA

Additional information may be obtained from the following individuals:

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Approved by: _____ Date: 4/25/2018
Curtis R. Scott, PE
FHWA-CFLHD, Chief Engineer

Approved by: _____ Date: 5.2.18
Sandra Moberly
Town of Mammoth Lakes, Economic and Community Development Manager

What's In This Document

The Federal Highway Administration (FHWA) Central Federal Lands Highway Division (CFLHD), with the Town of Mammoth Lakes and the U.S. Forest Service Inyo National Forest has prepared the Reds Meadow Road Improvements Project Environmental Assessment (EA) and Initial Study (IS), which examined the potential environmental impacts of the alternatives being considered for the proposed project located in Madera County, CA. The EA/IS document describes why the project is being proposed, alternatives considered for the project, the existing environmental conditions that could be affected by the project, the potential impacts from each of the alternatives, and the proposed measures to avoid, minimize, and/or mitigate project-related impacts.

FHWA-CFLHD is the lead agency for the National Environmental Policy Act (NEPA) compliance and the Town of Mammoth Lakes is the lead agency for the California Environmental Quality Act (CEQA) compliance. A Finding of No Significant Impact (FONSI) and Mitigated Negative Declaration are enclosed. The EA/IS circulated for public review is incorporated by reference (Appendix A), with response to public and agency comments received (Appendix B). Any updates, including new text or revisions to the EA/IS, are included in the enclosed errata.

For individuals with sensory disabilities, this document can be made available in Braille, large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please call or write to:

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U.S. Department of Transportation
Federal Highway Administration
Central Federal Lands Highway Division

FINDING OF NO SIGNIFICANT IMPACT

For

Reds Meadow Road Improvements Project
INYO NATIONAL FOREST
FTFS 03S11(1)
MADERA COUNTY, CA

This Finding of No Significant Impact is submitted pursuant to:

42 U.S.C. 4332(2)(c)

The Federal Highway Administration (FHWA), Central Federal Lands Highway Division (CFLHD), has determined that this project, for which Alternative 3 (the Preferred Alternative) has been selected, will have no significant impact on the human or natural environment. Principal areas of public controversy have been addressed, and there are no major unresolved issues outstanding. This finding is based on the attached Environmental Assessment, coordination with local and federal agencies, public involvement, and applicable laws, executive orders, and regulations. The Environmental Assessment, with revisions contained herein, accurately and adequately discusses the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It lists environmental commitments to be carried out by the FHWA in order to minimize unavoidable impacts. The Environmental Assessment provides sufficient evidence and analysis for determining that an Environmental Impacts Statement is not required. The Federal Highway Administration takes full responsibility for the accuracy, scope and content of the following Environmental Assessment.

Approved by:

Curtis R. Scott, PE
FHWA-CFLHD, Chief of Engineers

Date: 4/25/2018

Mitigated Negative Declaration

Pursuant to: Division 13, Public Resources Code

Project Description

The Federal Highway Administration (FHWA) Central Federal Lands Highway Division (CFLHD), in cooperation with the Town of Mammoth Lakes and with the U.S. Forest Services Inyo National Forest, is proposing improvements to Reds Meadow Road in Inyo National Forest. The project includes improvements to approximately 8 miles of Reds Meadow Road in Inyo National Forest, from the Minaret Vista Entrance Station to the dead-end at Reds Meadow Resort. Proposed improvements were described in Alternative 3 of the Initial Study. The Proposed Improvements are described as two segments: Upper 2.5-Mile Segment and the 5.8-Mile Lower Segment. The following bullets describe the proposed improvements:

- Proposed improvements in the Upper 2.5-Mile Segment include reconstructing and widening the existing roadway to 22 feet with 1-foot minimum shoulders and a design option to extend the fill-side shoulder to 4 feet. Culverts would also be replaced and potentially up-sized, as needed. Culvert inlets would be designed and constructed based on site conditions and culvert outfalls would be designed and constructed to correspond with the proposed downhill slope conditions. Fill slopes would be used to widen the roadway where topography allows. Extensive retaining wall work, primarily on the downhill side of the roadway, would be implemented to support the widened roadway in areas too steep for traditional fill slope improvements. The potential modification of existing rock outcroppings through the use of minor cut-side walls and grading, at select locations, may also be necessary. In addition to the widened cross-section, the alternative would include applicable signage, new striping, and guard rail along segments with fill-side retaining walls.
- Proposed improvements in the 5.8-Mile Lower Segment include pavement rehabilitation and culvert replacement. The proposed improvements to the lower segment may involve minor vegetation clearing immediately adjacent to the roadway to accommodate construction activities. The existing pavement width is approximately 22 feet and would be repaved to a width of 22 feet with associated shoulder stabilization and appropriate signing and striping. Select tight curves that experience wheel off tracking by buses or trailers could receive minor inside pavement widening to improve safety and reduce roadside rutting. Culverts would be replaced, potentially up-sized in diameter, and include riprap at the inlet and outlet to control scour. Select areas with substandard sight distance would be addressed through minor vegetation removal and/or rock outcrop removal. Failing roadside fill slopes (e.g., location approximately 500 feet north of the Devils Postpile National Monument entrance turn-off) would be repaired by excavating the embankment and replacing with a retaining wall and compacted backfill. The existing underground utilities within the road prism would be protected in place. In the event the utility requires relocation due to construction, it would be relocated within the existing roadway prism. Additionally, a new underground conduit and associated appurtenances are proposed to accommodate a fiber optic cable for information transmission along the corridor.

Determination

The Town of Mammoth Lakes has prepared an Initial Study for this project, and following public review, has determined from this study that the proposed project would not have a significant effect on the environment for the following reasons:

The proposed project would have no effect on:

- Agricultural and Forest Resources
- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic

In addition, the proposed project would have less-than-significant effects to:

- Hydrology and Water Quality
- Cultural Resources
- Noise

With incorporation of mitigation measures proposed in the Initial Study, the proposed project would have less-than-significant effects to:

- Aesthetics
- Biological Resources
- Tribal Cultural Resources
- Utilities and Service Systems

Approved by: refer to NOD signed June 7, 2018 Date: _____

Sandra Moberly
Town of Mammoth Lakes, Economic and Community Development Manager

Public Review of the Environmental Document

This EA/IS was circulated for public and agency review for a 30-day period from September 1 to September 30, 2017. The draft document was available for review at https://flh.fhwa.dot.gov/projects/ca/reds-meadow/ and at the Town of Mammoth Lakes (437 Old Mammoth Road, #R, Mammoth Lakes, CA 93546). Written comments were accepted during the meeting or via mail/email by Wendy Longley, FHWA-CFLHD (12300 West Dakota Ave., Lakewood, CO 80228/ Wendy.Longley@dot.gov) or Haislip Hayes, Town of Mammoth Lakes (437 Old Mammoth Road, #R, Mammoth Lakes, CA 93546/ hhayes@townofmammothlakes.ca.gov). Verbal comments were also accepted at a public hearing using a court reporter. The court reporter produced a transcript to document verbal comments.

A Notice of Completion was prepared and submitted to the California State Office of Planning and Research State Clearinghouse pursuant to CEQA on August 29, 2017. A notice of availability of the EA/IS was published in the *Mammoth Times* on September 1, 2017, and ran for 1 week. A total of eight individuals, two organizations, and two public agencies submitted comments on the EA/IS. Two individuals were in favor of the project, while the other individuals commented on use of the entrance fee, and issues related to environmental impacts and public safety. The two organizations (Friends of the Inyo and Range of Light Group-Toiyabe Chapter) and one agency (National Parks Service – Devils Postpile Monument) noted that they favored a different alternative than what is proposed, and also have several environmental and social concerns. The remaining agency (California Department of Fish and Wildlife) stated that the department believes it has jurisdiction over some resources in the project area and stated related environmental concerns. These comments and responses to each comment are presented in Appendix B.

ERRATA

The following revisions apply to the Environmental Assessment (EA) and Initial Study (IS) for the Reds Meadow Road Improvements Project. The EA/IS was released for a 30-day public review on September 1, 2017. These revisions are minor and do not affect the selection of the Preferred Alternative or change the conclusions of the EA/IS, but serve to correct errors or clarify information provided in the document, based on public and agency comments received. Table 1 lists the corrections and revisions to the EA/IS text. Text strikethroughs show text has been removed from the EA/IS (e.g., ~~strikethrough text~~). Underlined text shows text has been added to the EA/IS (e.g., <u>underlined text</u>). Clarification or added context for new or revised text is provided in italicized text (e.g., *italicized text*).

Table 1. Corrections and Revisions to the Environmental Assessment/Initial Study

Chapter/Section/ Table/Figure	Page No.	Revisions
Table 3-1	25	~~Neither the Middle Fork San Joaquin River nor its tributaries in the larger valley are listed on the National Wild & Scenic River System Inventory.~~ The Middle Fork of the San Joaquin River is eligible for Wild and Scenic River Act designation. With implementation of best management practices and mitigation measures, the Preferred Alternative would not have an adverse effect or measurable impacts on the free-flowing condition, outstanding remarkable values (ORVs), water quality, or classification of the river.
3.2.2	27	The Middle Fork San Joaquin River is the predominant drainage feature in the valley, with its two major tributaries, Minaret Creek and Reds Creek, flowing into the valley from the Ritter Range peaks west of Reds Meadow Road and below Mammoth Mountain southeast of Reds Meadow Road, respectively.
3.2.2	28	Several small ~~alpine~~ lower montane lakes are present in the valley, including Starkweather Lake and Sotcher Lake ~~Reds Lake~~.
3.2.2	28	*An additional round of aquatic resource delineation was completed in August 2017 and the Wetland Delineation Report has been revised since it was published with the Draft EA/IS. The revised Wetland Delineation Report is in Appendix C of this document. Please note that water feature identification numbers have changed. The EA/IS text has been updated to incorporate the results of the additional delineations.* In addition, a database review of the National Wetlands Inventory indicated numerous palustrine forested, emergent, and shrub wetlands concentrated in the 5.8-Mile Lower Segment near Agnew Meadows, Minaret Creek, and Reds Creek. However, a wetland delineation was conducted in September 2016 ~~(Appendix E – Technical Studies)~~ and August 2017 to identify potential wetland and waters of the United States locations within the project area, and five ~~no~~ wetland areas were identified. ~~Although the National Wetlands Inventory wetland areas identified as part of the database review were found to have the required hydrology and dominance of plants typically found in wetlands, they did not contain hydric soils and as a result did not satisfy the full wetland criteria requirements.~~ Additionally, the ~~The~~wetland aquatic resources delineation referenced above did ~~however~~ identify the presence of ~~12~~ 28 ~~channels crossing the project area roadway~~ natural watercourses within the study area, and 26 of those features were determined to be potentially jurisdictional waters of the United States (WUS). As shown on Figure 5, the majority of these channels are in the 5.8-Mile Lower Segment, with only WUS 1-~~3~~6 located in the Upper 2.5-Mile Segment. Table 3-2 summarizes the identified water features.
Figure 5	29	*Figure 5 has been updated to identify the locations of Waters of the U.S. identified in the Wetland Delineation Report (August 2017, Appendix C of this document)*
Table 3-2	30	*Table 3-2 has been updated to identify revised impacts to Waters of the United States identified in the Wetland Delineation Report (August 2017, Appendix C of this document)*
Table 3-4	35-38	*Table 3-4 has been updated to include updated information for Tulare rockcress, northern goshawk, Sierra marten, and Yuma myotis, as well as the addition of the Pallid bat and Western red bat (Appendix C of this document).*

Table 1. Corrections and Revisions to the Environmental Assessment/Initial Study

Chapter/Section/ Table/Figure	Page No.	Revisions
3.3.1	39	**Wildlife** The preliminary data review identified 12 special-status wildlife species with the potential to occur in the vicinity of the project area. Most of the species are unlikely to occur due to a lack of suitable habitat. Three federally regulated species [bald eagle (*Haliaeetus leucocephalus*), goshawk (*Accipiter gentiles*), and Sierra marten (*Martes caurina sierra*)] have moderate potential to occur, and ~~six~~ eight species [Paiute cutthroat trout (*Oncorhynchus clarkii seleniris*), Yosemite toad, California spotted owl (*Strix occidentalis*), prairie falcon (*Falco mexicanus*), fisher (*Pekania pennanti*), pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), and Yuma myotis (*myotis thysanodes*)] have low potential to occur.
3.3.2	41	Project effects to the other special status species with potential to occur, listed in Table 3-4, would be avoided either through mitigation (Section 3.3, Biological Resources) or because those species are more mobile and have a larger home range with the ability to avoid construction disturbance.
3.3.2	41	**General Wildlife** The Preferred Alternative could result in direct mortality, wounding, injury, or harassment of general wildlife because of construction activities. Visual and noise disturbance during construction may make habitat adjacent to the road undesirable for foraging. Permanent conversion of wildlife habitat into a roadway, temporary removal of vegetation, and alteration of the terrain to facilitate the construction of the Preferred Alternative could occur. The proposed fill slope improvements and walls are not expected to impede migratory routes for wildlife as the wildlife species that normally migrates through the project area (i.e., North American black bear *[Ursus americanus*), mule deer (*Odocoileus hemionus*), coyotes (*Canis latrans*), pine marten (*Martes Americana*]) are all highly mobile species that would be able to go around these intermittent features. Walls would be an impediment to small animal movement. Preliminary design will consider the addition of cross culverts or upsizing existing culverts that would allow for small animals to move under the road to access habitat on the opposite side. Additionally, ~~although~~ the goshawk (*Accipiter gentiles*) is known to occur in the area and likely forages within habitat adjacent to the road; however, nesting is not known to occur adjacent to the road corridor. ~~Habitat in the project area lacks sufficient canopy cover to support nesting.~~ Similarly, the Sierra marten *(Martes caurina sierra)* is known to occur in the surrounding area, ~~but~~ and is likely to forage within the area adjacent to the road; however, ~~again the habitat in the project area lacks the canopy density the species prefers and~~ the level of human activity ~~also~~ likely precludes significant use by the species. The project would result in a loss of negligible amounts of foraging habitat for individuals of the species and cause individuals ~~the species~~ to avoid the area adjacent to the road during construction. Bat species that may be using the road corridor could be adversely affected during construction, particularly as a result of nighttime construction. The removal of vegetation would result in permanent loss of negligible amounts of potential roosting and foraging habitat for bat species. However, the habitat adjacent to the road would not be considered high quality due to the existing disturbance by vehicles including maintenance vehicles use of the road

Table 1. Corrections and Revisions to the Environmental Assessment/Initial Study

Chapter/Section/ Table/Figure	Page No.	Revisions
		Nighttime construction activities could disturb bat foraging in areas adjacent to the road as a result of noise and lighting disturbance. Construction activities at night would cause bats to avoid the project area and adjacent areas. Temporary effects on bats as a result of nighttime construction will be avoided and minimized, as described below in Section 3.3.3. The project is not anticipated to have an adverse impact on migratory birds, bald eagles *(Haliaeetus leucocephalus)*, or golden eagles (*Aquila chrysaetos*). Although the project would require the removal of habitat, including mature tree removals, these habitat modifications would be limited to the areas immediately adjacent to the project area and the bird species present in the project area also have adequate habitat within the Inyo National Forest. The impacts to individual trees would be negligible in the context of Inyo National Forest in its entirety. Additionally, temporary effects on regulated birds will be avoided and minimized, as described below in Section 3.3.3., ~~Biological Resources.~~
3.3.3	42	*Added an additional measure under Section 3.3.3, Avoidance, Minimization, and/or Mitigation Measures:* • **Prohibition of Loud Noises at Night.** Standard construction noise mitigation techniques such as proper equipment exhaust noise dissipation (i.e., muffler) and the utilization of hay bales to reduce the amount of noise leaving the construction site will be implemented. Nighttime construction-related noise could be more noticeable to sensitive receptors. Additional measures to minimize nighttime construction-related noise will be implemented, including a prohibition on certain types of loud activities at night.
3.3.3	42	*Added an additional measure under Section 3.3.3, Avoidance, Minimization, and/or Mitigation Measures:* • **Night Lighting Controls.** Lighting impacts will be controlled by limiting the use of lighting to that required for operations and safety, directing light specifically to required areas, and using hooded light fixtures to prevent light spill into surrounding areas and into the night sky.
3.5.1	50	The Mammoth Pass Trail, a trail used by the North Fork Mono and Paiute Tribes well into the 19th century, can be followed even today by following King Creek Trail across DPNM, through Reds Meadow, and over Mammoth Pass.
3.6.2	53	Final confirmation and concurrence from SHPO, consistent with the determination of No Adverse effect ~~and *de minimis* Section 4(f) finding are both pending~~, and therefore the *de minimis* Section 4(f) finding, was received on November 16, 2017.
3.7.1	54	The project is located ~~within the San Joaquin Valley of Madera County~~ in Madera County within the San Joaquin Valley Air Basin, a non-attainment area (does not meet the standard) for particulate matter and ozone (Appendix B – Final Planning and Environmental Linkages Report).
3.12	71	*Section 3.12 has been revised to remove the bullet identifying Economics, Land Use, and Recreation Resources as a resource with a cumulative impact assessment. No long-term impacts are identified for the resource*

Table 1. Corrections and Revisions to the Environmental Assessment/Initial Study

Chapter/Section/ Table/Figure	Page No.	Revisions
		and construction impacts will be minimized; therefore, no cumulative impacts assessment is warranted.
4.0	77	*The project website has been added to Section 4.0, to document its availability to the public.* The project team conducted a series of agency coordination and public involvement efforts, which are summarized in this section. Detailed meeting summaries, including supporting materials and graphics, are provided in Appendix A – Stakeholder and Public Meeting Summaries. The project team also maintains a project website with applicable project-related information and documents for public access (https://flh.fhwa.dot.gov/projects/ca/reds-meadow/).
4.4	77-78	*Section 4.0, Agency Coordination and Public Involvement, has been updated in the EA/IS to include a summary of the public hearing. The public hearing summary text has been added to the Final EA as Section 4.4, Public Hearing – September 7, 2017. Section 4.4, Agency Consultation has been revised to Section 4.5, Agency Consultation. Section 4.4, Public Hearing – September 7, 2017, as shown below. The meeting materials from the public hearing are located in Appendix C of this document.* **4.4 Public Hearing – September 7, 2017** A public hearing was held from 5 to 7 p.m. on September 7, 2017, at the Town of Mammoth Lakes offices in Mammoth Lakes, California. Notice for the public hearing was posted in the *Mammoth Times* on September 1, 2017, and ran for 1 week. The hearing was organized and conducted in an open house format. including exhibits to display information and project staff to answer questions and record comments, as well as a presentation that focused on summarizing the proposed project and related anticipated impacts. Public comments were prioritized during the hearing and the public could provide comment using a paper form during the meeting, mail the paper form in at a later date during the comment period, email comments to either Wendy Longley at FHWA-CFLHD or Haislip Hayes at Town of Mammoth Lakes during the comment period, or give verbal testimony, which was recorded by a court reporter. The verbal testimony is documented in Appendix C of this document. A total of 14 public comments were recorded. A total of eight individuals, two organizations, and two public agencies submitted comments on the EA/IS. Two individuals were in favor of the project, while the other individuals commented on use of the entrance fee and issues related to environmental impacts and public safety. The two organizations (Friends of the Inyo and Range of Light Group-Toiyabe Chapter) and one agency (National Parks Service – Devils Postpile Monument) noted that they favored a different alternative than what is proposed, and also have several environmental and social concerns. The remaining agency (California Department of Fish and Wildlife) stated that the department believes it has jurisdiction over some resources in the project area and stated related environmental concerns. All comments and responses to comments are documented in Appendix B of this document.
4.4	78	Final confirmation and concurrence from SHPO, consistent with the determination of No Adverse effect ~~and *de minimis* Section 4(f) finding are both pending~~, and therefore the *de minimis* Section 4(f) finding, was received on November 16, 2017.

Table 1. Corrections and Revisions to the Environmental Assessment/Initial Study

Chapter/Section/ Table/Figure	Page No.	Revisions
Figures 1, 5, 6, 7, 8a	2, 29, 47, 48, 61	*The boundary of the Devils Postpile National Monument has been updated to match that shown in Figure 1 in the Preliminary Environmental Linkages Report (Appendix B in the Draft EA/IS). A representative figure is also available for review in Appendix C of this document.*
Appendix H	Section 3.3	*Added an additional measure in Appendix H of the EA/IS, List of Environmental Commitments, under Section 3.3, Biological Resources (Appendix C of this document):* • **Prohibition of Loud Noises at Night.** Nighttime construction-related noise could be more noticeable to sensitive receptors. Additional measures to **minimize** nighttime construction-related noise will be implemented, including a prohibition on certain types of loud activities at night.
Appendix H	Section 3.3	*Added an additional measure in Appendix H of the EA/IS, List of Environmental Commitments, under Section 3.3, Biological Resources (Appendix C of this document):* • **Night Lighting Controls.** The potential impacts of lighting will be controlled through **minimization** of lighting required for operations and safety, directing light specifically to required areas, and using hooded light fixtures to prevent light spill into surrounding areas and into the night sky.

Appendix A

Reds Meadow Road Improvements Project Draft Environmental Assessment and Initial Study

The *Reds Meadow Road Improvements Project Draft Environmental Assessment and Initial Study* is available online for public review at https://flh.fhwa.dot.gov/projects/ca/reds-meadow/**.**

Appendix B

Response to Comments Received During Public Comment Period

Response to Public Comments Regarding the Reds Meadow Road Improvement Project Draft Environmental Assessment and Initial Study

Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
Jora Fogg, Friends of the Inyo	1a	We are respectfully writing to express our concerns about the Reds Meadow Road Reconstruction proposal and believe the 1.5 lane with pull outs alternative needs careful consideration.	The project team acknowledges your comment related to the 1.5-lane with pull outs alternative. The "1.5 lane with pull outs alternative" was carefully considered, as described in Section 2.1.2, Alternatives Considered but Dismissed, in the Draft EA/IS as Alternatives 2 and 2a. The conclusion reached in the Draft EA/IS for Alternative 2 was "Alternative 2 was considered a feasible alternative, but did not meet the purpose and need as well as Alternatives 3 and 3a (the two-lane alternatives on the upper 2.5-mile segment) or Alternative 4 (combination one-lane/two-lane road on upper 2.5-mile segment with select areas of realignment on the 5.8-mile lower segment) because mobility and deteriorating roadway conditions would be addressed in fewer areas." The conclusion reached in the Draft EA/IS for Alternative 2a was "While Alternative 2a is considered a feasible alternative, the improvements would not meet the purpose and need as well as Alternatives 2, 3, 3a, or 4 because mobility and deteriorating roadway conditions would be addressed in fewer areas for the upper 2.5-mile segment. Additionally, no improvements to the 5.8-mile lower segment would be implemented. Therefore, this alternative has been dismissed and further evaluation is not included in this document."	NO
	1b	In its current version the Environmental Assessment (EA) does not adequately address the cumulative impacts to visitor experience and wildlife.	The project team acknowledges your comment related to impacts to visitor experience and wildlife and agrees that these are important resources. Potential direct project impacts to wildlife (addressed under Biological Resources, Draft EA/IS – Section 3.3) and visitor experience (addressed under several of the Draft EA/IS categories: Economic, Land Use, and Recreational Resources [Section 3.4], Air Quality [Section 3.7], Visual Quality [Section 3.8]., and Traffic/Transportation [Section 3.10]) have been presented. The corresponding and applicable cumulative impacts to Biological Resources – Section 3.3 and Visual Resources – Section 3.8 are addressed in Section 3.12. In addition, and with implementation of environmental commitments (Appendix H) to avoid, minimize, and/or mitigate the remaining level of direct and indirect impacts would not contribute appreciably to cumulative impacts.	NO
	1c	The Environmental Assessment does not discuss the possibility of the construction of a two lane road leading to more buses in order to bring more visitors to the Park, coupled with the need for more parking, which is a current issue not being addressed in the valley. Parking capacity and traffic congestion are an ongoing problem that will only worsen with better and safer access to the valley. Regardless of the alternative selected, the EA must present this issue and discuss the impacts.	The project team acknowledges your comment related to the assumption that more buses/visitors will result from the Preferred Alternative and recognizes the importance of these resources. The project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than implementation of the Preferred Alternative, including management of traffic into the valley by USFS. USFS has jurisdiction over management of the carrying capacity of facilities in the Inyo National Forest. USFS is not proposing the change their strategy for managing traffic volume in the valley as a part of this project. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under the National Environmental Policy Act (NEPA). The proposed improvements, without changes to other conditions are not likely to generate additional trips to the valley beyond what would have been generated under the existing conditions. Improving the upper segment to two 11-foot lanes would make the upper segment consistent with the lower segment which will be rebuilt as two 11-foot lanes. Since traffic volume is not expected to substantially increase due to the project, the project will have no substantial impacts on parking. Additionally, if there is evidence that parking is already limiting the number of visitors staying in the valley then that will continue to be a limiting factor. Solutions for at-capacity parking conditions are not within the scope of this project or required as mitigation.	NO
	1d	A two-lane road will not only require significant habitat modification but also poses a number of threats to wildlife not adequately addressed in the EA.	The project team acknowledges your comment concerning threats to wildlife, caused by implementation of a two-lane road, and recognizes the importance of biological resources. The effects to wildlife were evaluated in Section 3.3 of the Draft EA/IS and impacts to sensitive species evaluated in the Biological Assessment/Biological Evaluation (BA/BE) provided in Appendix E. Based on the public comments received, Section 3.3.2 of the Final EA/IS Errata has been revised to elaborate on the impacts to wildlife that may result from the Preferred Alternative. The effects to wildlife include injury and mortality from vehicle use of the road and effects on wildlife movement as a result of walls. Please see response to comments 1e, 1f, and 1g that describe these changes in the Final EA/IS Errata.	YES, elaborated on impacts to general wildlife from vehicles using the roadway and resulting from implementing the walls.

Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
	1e	Large retaining walls along the reconstructed route will be a barrier to wildlife (especially smaller species such as the declining Porcupine) using the road as a corridor or using the adjacent forested and spring/seep habitats.	The project team acknowledges your comment regarding the proposed retaining walls. The effects to wildlife from walls were acknowledged in Section 3.3.2 of the Draft EA/IS. However, based on public comments received, the Final EA/IS Errata has expanded upon the evaluation of effects of walls on wildlife movement that may result from the Preferred Alternative. It is acknowledged that highly mobile species would be able to navigate to openings along the slope of the upper 2.5-mile section of roadway. Other smaller species, however, would experience more difficulty travelling to openings between wall segments. Although more difficult, animals would continue to be able to traverse the hillslope within the upper 2.5 miles of the project between wall locations and through drainages. The project design will also maintain or upgrade culverts under the roadway, which can also provide for wildlife passage for smaller animals. It should be noted that the design of the roadway and walls is at a preliminary level. The impacts described in the Draft EA/IS represent a worst-case scenario. As design progresses, efforts will be made to reduce wall lengths and heights to the extent practicable.	YES, elaborated on the evaluation of potential impacts to wildlife movements caused by the Preferred Alternative.
	1f	A 1.5 lane road will reduce driver speed and wildlife collisions. During the times the road is open to the public, and those using their private vehicles for camping, backpacking and boating, keeping the current speed limit is not enough. There is no enforcement of the speed limit and no agency plan for law enforcement during and after construction.	The project team acknowledges your comment regarding reduction of driver speed and enforcement of the speed limit. The roadway is unsafe according to modern roadway standards. The existing width on the upper segment is currently 16 to 21 feet and the proposed travel way width is 22 feet. This maximum 5-foot width increase of the upper segment's travel way, not including the shoulder, will not warrant an increase in speed limit. The design speed for the Preferred Alternative would be the same as existing: 25 mph in the upper segment and 25 mph in the lower segment. Additionally, the existing curves will remain and continue to serve as a mechanism for keeping speeds low along the roadway. In addition, improvements to sight distance and providing a clear zone will help to minimize the potential for wildlife/vehicle collisions. It is recognized that any roadway presents the potential for vehicle collisions with wildlife; however, compared to existing conditions, there would be no measurable changes. Sign placement for speed limit signs, animal crossings, trail crossings, and sharp curves will be decided during final design. Striping in the upper 2.5-mile segment would be a safety improvement over the existing conditions. Speed limit enforcement protocols are outside of the purview of this project. Any agency with state peace officer authority can enforce the speed limit on Reds Meadow Road. Currently, Madera County provides law enforcement and emergency services to Reds Meadow Road under a memorandum of understanding (MOU).	NO
	1g	We highly recommend an analysis followed by implementation of moveable speed bumps, speed dips or other mechanisms for slowing vehicle speed.	The project team has considered traffic-calming measures. Speed control for a rural road such as Reds Meadow Road is typically initiated to address the concern of unlawful speeds or a history of crashes associated with speed. Determining the appropriate speed control measure involves an evaluation of education, enforcement, and engineering options. Education entails informing drivers about their travel speed and safety issues associated with speeding and to heighten their awareness of enforcement countermeasures that are designed to curtail speeding. Enforcement encompasses the actions taken by appropriate empowered authorities to check that drivers of motor vehicles are complying with the legal posted speed limit and a variety of countermeasures used by law enforcement to deter motorists from speeding. Engineering countermeasures include signing, striping, pavement markings, and/or physical traffic calming features (e.g., speed hump). Speed humps are a raised section of asphalt approximately 12 feet long and 4 inches high, and are not to be confused with speed bumps, which are much shorter and usually found in parking lots. Speed humps are generally used on residential roads and are not commonly used in rural mountainous terrain with steep grades. The Reds Meadow Road project does not propose to change the existing posted speed limits or access management of the Minaret Entrance Station. Speed control has not been evaluated to date due to the absence of a warranting reason. Additionally, the project is retaining the existing curves that serve as a mechanism for keeping speeds low will not be changed, thereby avoiding and minimizing environmental impacts, and retaining the existing character of the area. Traffic will travel at speeds similar to existing conditions to navigate the curves. Sign placement for speed limit signs, animal crossings, trail crossings, and sharp curves will be decided during final design. Striping in the upper 2.5-mile segment would be a safety improvement over the existing conditions. Speed limit enforcement protocols are outside of the purview of this project.	NO

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Written Comments from the Public During Comment Period				
	1h	Second, we recommend the agencies with jurisdiction develop a law enforcement plan.	The project team recognizes that law enforcement and speed limit enforcement are important; however, law enforcement protocols are outside of the purview of this project. The USFS has jurisdiction over enforcing laws in the National Forest.	NO
	1i	Third, we recommend consultation with a wildlife biologist to incorporate wildlife crossing infrastructure with a focus on the spring and seep areas along the road where wildlife frequent. The construction and posting of wildlife signs are also critical.	The project team recognizes that wildlife uses the habitat along the roadway corridor and that the Preferred Alternative would result in potential adverse effects. See responses to comments 1e and 1f. The project will implement reasonable and prudent measures to avoid, minimize, and/or mitigate direct and indirect impacts to general wildlife and vegetation communities. Wildlife signage will be considered during subsequent design stages to notify roadway users to be on the lookout for wildlife crossing the roadway. Given that wildlife/vehicle collisions are not anticipated to change significantly from existing conditions, constructing wildlife crossings would likely cause additional permanent impacts in areas regularly used by wildlife. As part of the project, existing drainage features under the roadway would be maintained or upgraded. These drainage features can be utilized by smaller wildlife to cross under the roadway.	NO
	1j	Forth, during the breeding season construction noise should be minimized from dawn to midmorning by establishing noise protocols, similar to other road construction projects in sensitive areas.	Because of the shortened construction season in this location, it would be infeasible to implement the timing restriction suggested by the commenter. By further restricting the daily construction timing as suggested, it would likely extend the number of construction seasons needed to improve the roadway. This would result in an increase the length of time that wildlife would be impacted as well as other resources such as visitors and operations.	YES, added commitment for prohibition on loud night noises to Biological Resources Section.
	1k	Although the EA acknowledges the presence of 12 species of bat, it then fails to analyze impacts to them during twilight and night driving hours. Particularly there are three sensitive species (Spotted bat, Western Mastiff, Long-legged Myotis), and seven other species of bat using the valley and adjacent forest habitat (along road corridor) on a regular basis.	The project team recognizes the importance of protecting bats. Based on comments received, the wildlife section of the EA/IS has been revised to elaborate on the impacts to general wildlife, including bats. See Section 3.3.2, Biological Resources, of the Final EA/IS Errata. In addition, the Draft EA/IS stated that some construction activities could occur at night (Table 3-1), “Nighttime construction-related noise could be more noticeable to sensitive receptors. Additional measures to minimize nighttime construction-related noise will be implemented including a prohibition on certain types of loud activities at night....” This commitment to minimize noise impacts during construction has been added to the Biological Resources in the Final EA/IS Errata. A commitment has also been added to the Biological Resources, Section 3.3.3, of the Final EA/IS Errata to minimize or mitigate lighting impacts, ”Lighting impacts will be controlled by limiting the use of lighting to that required for operations and safety, directing light specifically to required areas and using hooded light fixtures to prevent light spill into surrounding areas and into the night sky.” No impacts as a result of nighttime driving are expected beyond existing conditions during operation of the Preferred Alternative.	YES, added commitment for night lighting controls during construction work to Biological Resources Section.
	1l	Two other species of particular concern are Northern Goshawk and Sierra Marten, which are Inyo National Forest Sensitive Species and candidates for Species of Conservation Concern. Both species use the habitat adjacent to the road for nesting and foraging. The EA’s assertion of inadequate habitat due to canopy cover is false- both species are regularly seen in this area and some of the largest specimens of Red Fir (a tree species which both species utilize) exist along the road corridor.	The project team recognizes the importance of protecting the northern goshawk and Sierra marten. Biological resources within the Biological Study Area were assessed in the BA/BE completed for the project, which was typically 50 feet from the road. The project team had discussions with USFS biologists with regards to species to evaluate as well as potential impacts. And the commenter is correct in that these species are known to occur within the valley and may forage within the Study Area. The USFS and USFWS concurred with the results of the BA/BE. Concurrence from USFWS was received on August 11, 2017, and is located in Appendix F of the Draft EA/IS. The Draft EA/IS (Table 2-1) and BA/BE only evaluated the northern goshawk within the Biological Study Area, not the surrounding area or the entire valley. Although there may be sufficient cover for nesting in some areas in the valley, the evaluation determined there was not sufficient canopy for nesting in the Biological Study Area. In further discussion with USFS biologists, there is no known nests occurring adjacent to the road. The EA/IS states that goshawks and martens likely use the area for foraging and their potential to occur was classified as “Moderate”. Therefore, it is likely that these species would avoid use of the Study Area during construction. The EA/IS text has been revised in Table 3-4 to indicate that individuals of these species may be affected but that it would not likely result in a trend toward federal listing. The project will implement reasonable and prudent measures to avoid, minimize, and/or mitigate direct and indirect impacts to wildlife species as indicated in Section 3.3.3 of the EA/IS.	NO

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	1m	We strongly encourage the TOML and the Inyo National Forest to establish a joint monitoring plan for wildlife impacts. Such a monitoring protocol could begin as early as next year, allowing a three-year period of data collection on wildlife collisions prior to 2021 construction. Data collection would continue during and following construction. This will allow agencies to track numbers and species of wildlife injuries and deaths and apply adaptive management if necessary.	The project team appreciates the recommendation for a joint monitoring plan and corresponding interagency collaboration required for such a plan, however there is no existing evidence to suggest that roadkill or wildlife injury due to incidents with vehicles is an existing problem or will be a problem exacerbated by the preferred alternative. One incident was noted by the public/stakeholders in which a group of grouse was struck by a vehicle. No other incidents were reported; therefore, no monitoring plan is warranted. However, once the reconstructed roadway is operational, the Town of Mammoth Lakes will record wildlife collision as part of the Statewide Integrated Traffic Records System.	NO
Lynn Boulton, Range of Light Group-Toiyabe Chapter (1)	2a	We would prefer to see the 1.5 lane option with pullouts to minimize impacts to wildlife and traffic in the valley, but we recognize there are safety benefits to the 2-lane option.	See response to comment 1a.	NO
	2b	We predict there will be an increase in traffic. Currently, shuttle buses can only pass each other at the wider sections of the upper section of the road so it is one of the restricting factors for how frequently shuttle buses are run. Yet, there is a demand for more busses due to increased ridership. Rainbow Falls is often at capacity now and many times after a long day hike out of Agnew Meadows I have had to let several full buses go by before I could board one. Once the wider road permits more traffic, ridership will be the driving factor. More shuttle runs will be added bringing more visitors down canyon. The planned redevelopment at the base of Mammoth Mountain will exacerbate this problem. At some point, there will be too many people visiting the Devils Postpile NM to make it an enjoyable experience or an experience of nature.	The project team has noted your prediction that the project will increase traffic in the valley and the related impacts. The project team does not anticipate an increase the volume of traffic on Reds Meadow Road, caused by the Preferred Alternative. The improvements being made to Reds Meadow Road are to remedy deteriorated roadway conditions; maintain access, mobility, and safety; and increase emergency response/ evacuation capabilities. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles, including buses, into the valley will be consistent with the existing conditions unless other courses of action are taken as a separate action. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under NEPA.	NO
	2c	There should be a limit to the number of cars allowed in the valley. There are only 65 parking spaces at the Devils Postpile NM and not many more than that at Reds Meadow. In 2016, there were 6,500 cars in the Postpile in September. That is 2,000 more than the high point in that summer when the shuttle buses were running; a significant spike. Over the Columbus Day weekend in 2015, there were 800 cars on the Sunday vying for the limited number of parking spots. Visitors were angry. The maximum visitor capacity of the Devils Postpile NM and Reds Meadow valley needs to be determined and managed. Widening the road will only exacerbate an existing problem. With Global Warming, the shoulder seasons, both spring and fall, will be extended adding even more traffic. The Range of Light Group would like to see a Memorandum of Understanding developed between the appropriate parties (USFS, NPS, TOML, ESTA) as part of this project to control traffic going into the valley.	The project team acknowledges your comment regarding a lack of parking spaces and over congestion in the valley. The project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than the Preferred Alternative, including management of traffic into the valley by USFS during the shoulder season. USFS has jurisdiction over management of the carrying capacity of facilities in the Inyo National Forest. USFS is not proposing to change their strategy for managing traffic volume in the valley as a part of this project. The proposed improvements, without changes to other conditions are not likely to generate additional trips to the valley beyond what would have been generated under the existing conditions. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under NEPA. Because traffic volume is not expected to substantially increase due to the project, the project will have no substantial impacts on parking. Additionally, if there is evidence that parking is already limiting the number of visitors staying in the valley, then that will continue to be a limiting factor. Solutions for at-capacity parking conditions are not within the scope of this project or required as mitigation.	NO
	2d	When the Reds Meadow road becomes a normal 2-lane road, people will drive faster, which will likely increase in wildlife deaths/road kill. Even though the road will be sinuous, it will not be a sufficient deterrent. Two lanes, pullouts, and line-of-sight between curves will encourage drivers to speed up between curves and brake at the curves. This road crisscrosses an important wildlife corridor (California Essential Habitat and connectivity Project). Wildlife currently walks along the Reds Meadow road and crosses it traveling up or down slope. Studies show increased driving speeds mean increased collisions with wildlife. The many “speed kills” signs in Yosemite National Park placed at road-kill sites remind us of this. The EA/IS should address how posted speed limits will be enforced and by which agency: USFS, NPS, or TOML.	With regards to the potential for increased wildlife impacts as a result of increased vehicle speeds with implementation of the Preferred Alternative please refer to response to comment 1f. It should be noted that the posted speed limit for the upper and lower segments of the roadway is not changing as a part of this project. Speed limit enforcement protocols are outside of the purview of this project Additionally, there is no existing evidence to suggest that roadkill or wildlife injury due to incidents with vehicles is an existing problem or will be a problem exacerbated by the preferred alternative. Wildlife signage will be considered during subsequent design stages to notify roadway users of the potential for wildlife crossing the roadway. Once the reconstructed roadway is operational, the Town of Mammoth Lakes will record wildlife collision as part of the Statewide Integrated Traffic Records System.	NO

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Written Comments from the Public During Comment Period				
	2e	Another wildlife concern is that the retaining wall will be a barrier to wildlife crossing the road; a cliff for animals going down slope or a vertical wall for animals going up slope. If the wall can be up to 13' in height, even deer will have difficulty clearing it from below. Smaller species or their young may not be able to jump off even a 5' wall and land safely or be able to climb up it e.g. snakes, baby grouse, rodents, and porcupines. Porcupines are a declining species and we are lucky they are present in the Agnew Meadow area. Some animals, e.g. coyotes, will probably follow the road until they find a place where the wall is shorter putting them in harm's way of traffic. We strongly recommend features be added in multiple places along the road making it possible for wildlife to quickly cross e.g. a slope, sloped wall, or terracing on the outside (west side) of the wall, preferably where they would naturally cross. They should not be funneled into just one location where their predators can sit in wait. Speed dips, signs, and road striping can be placed at these crossings to tell drivers to slow down. We ask that this project work with a wildlife biologist to determine the best way to design wildlife crossings and where to place them, e.g. riparian sections.	The project team acknowledges your comment regarding the proposed retaining walls. Please see response to comment 1e.	NO
	2f	It is important that construction is planned at times with the least impact to wildlife. We ask that the project consult a wildlife biologist to determine the best times to avoid construction activity e.g. nighttime and early morning. Many species are nocturnal, e.g. bats and animals are much more sensitive to noise and bright lighting than humans are. Even animals that are normally out and about during the day, will be limited by the construction activity and will wait until it ends each day to go about their search for food. Studies show that the highest concentration of bird activity is from dawn to early morning. Sound is essential to birds' survival and reproduction success. Mating, nesting, and fledging seasons must also be taken into account. A wildlife expert would be able to recommend when construction activity should be suspended.	The project team acknowledges your comment regarding construction occurring during particular times of the day and year. The project team has consulted with biologists from the USFS and USFWS regarding the project, the potential impacts, and mitigation measures to reduce impacts throughout the process. The Draft EA/IS commits to (Section 3.3.3): "If clearing and grubbing occur between February 15 and September 1, a qualified biologist(s) will survey for nesting birds within the area(s) to be disturbed, including a perimeter buffer of 50 feet for passerines and 300 feet for raptors, before clearing activities begin. All nest avoidance requirements of the Migratory Bird Treaty Act and CDFW Code will be observed (e.g., establishing appropriate protection buffers around active nests until young have fledged)." There is the potential for nighttime construction activities. Measures to minimize noise and light will be implemented. Those measures are described in Table 3-1 and Section 3.8.3, and have been added to Biological Resources. Section 3.3.3, of the Final EA/IS Errata. Please also see response to comment 1j.	NO
	2g	With increased traffic comes an increase in the amount of greenhouse gases. This needs to be acknowledged in the EA/IS and a carbon offset defined.	The project team has considered your assumption of increased traffic and related increase in greenhouse gases (GHGs). The project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than the Preferred Alternative, including management of traffic into the valley by USFS during the shoulder season. USFS has jurisdiction over management of the carrying capacity of facilities in the Inyo National Forest. USFS is not proposing to change its strategy for managing traffic volume in the valley as a part of this project. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under NEPA. The proposed improvements, without changes to other conditions are not likely to generate additional trips to the valley beyond what would have been generated under the existing conditions. Because traffic volume is not expected to substantially increase due to the project, the project will have no substantial impacts on GHG generation. Additionally, the reduction in congestion and vehicle queues/idling and the increase in travel efficiency could reduce the amount of time that combustion engines are in use and lower GHG emissions.	NO
	2h	We request that local, volcanic rocks be used to build the retaining wall (rockery style); not granite as the ridge is volcanic, for a more natural look and to make it easier for small mammals to scale it—more paw-holds. Fill should be volcanic rock as well.	The project team acknowledges your request for use of locally sourced materials in the retaining walls. The project has evaluated the potential for visual impacts associated with retaining walls, including rockery style, and has considered texture and color for those retaining wall structures. Locally sourced material will be considered as design progresses, and is dependent on availability and compatibility with construction requirements and specifications.	NO
	2i	We'd like to underscore the importance of diligently following through on the invasive plant management practices described on pg. 45 of the EA/IS. No new species should be introduced, especially yellow star thistle.	The project team recognizes the importance of invasive plant management practices. Measures to avoid, minimize, and/or mitigate impacts, identified as part of the Draft EA/IS are commitments for which applicable parties will be held responsible once carried through to the Final EA/IS Errata.	NO

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	2j	We'd like the EA/IS to reflect the fact that a goshawk nest was observed near the Minaret Campground in a survey of forest sensitive species by the Inyo NF staff and Goshawks have been seen flying in the area. They can reuse nests. Also, the west slope of the San Joaquin ridge is the preferred habitat of pine martens: unlogged, red fir. Please indicate the source of the information in the table that says the forest canopy isn't sufficient for goshawk nesting or for pine martens (pg. 37).	The Final EA/IS text has been revised to clarify that goshawk are known to nest in the valley. Please see response to comment 1l.	NO
	2k	It should be noted that 22 miles of the middle fork of the San Joaquin River in the Reds Meadow valley was listed as eligible for a Wild and Scenic River designation by Sierra NF in 1991 (Appendix E of their Forest Land and Resource Management Plan).	Please see response to comment 3x.	NO
	2l	we recommend monitoring before and after the road improvements are done for effects on wildlife, volume of visitors, and speeding and enforcement issues, followed by appropriate adaptations to management activities.	The project team has considered your recommendations. Responses for the issues of roadkill, volume and management of visitors, and speed limit enforcement can be found under comments 1m, 2b, and 2d, respectively.	NO
Deanna Dulen, National Parks Service - Devils Postpile National Monument	3a	Please explain the jurisdictional authority for the USFS-Inyo NF to have a DEA presented by another federal agency and municipal government that does not include the USFS-Inyo National Forest as the public lands manager in the decision document. It seems that the responsibilities of the USFS as the public lands management need to be addressed more directly and thoroughly, and consider the many concerns listed in this letter.	The FHWA-CFLHD is the lead agency for compliance with NEPA and has prepared the Environmental Assessment (EA) with cooperation from the USFS. An MOU was signed in 1998 between the USFS and FHWA that granted FHWA the responsibility to comply with NEPA and other legal requirements regarding the transfer of National Forest System Lands for Highway Purposes and that the USFS will act as a cooperating agency. In addition, the preparation of the Draft EA/IS by FHWA is consistent with Executive Order on Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure (August 2017) that states that each infrastructure project will have a lead federal agency responsible for navigating through the federal environmental review process. USFS Inyo National Forest has been a project partner and actively engaged throughout the project development process. The Town of Mammoth Lakes has a stake in the project as a local funding partner for the FLAP funding, as well as its commitment to maintain Reds Meadow Road after construction of the project. The Draft EA/IS establishes that the project is located within Inyo National Forest in the text (Sections 1.0 and 1.1) as well as in Figure 1 - Project Location Map. Additional, several USFS goals, guidelines/rules, and coordination efforts are identified throughout the project.	NO
	3b	This is a 24.5 million dollar project that could have significant impacts to wildlife including obstructing migratory corridors, introducing a two lane road with higher vehicle speeds, fragmenting connectivity of habitats over two and a half miles, and massive retaining walls that would be an obstacle to wildlife movement.	Please see response to comment 3g.	NO
	3c	NPS considers Alternative 2 the best option to meet the purpose and intent of the project by improving safety of the road, retaining the rustic character of the area and providing better protection to wildlife Alternative 3 proposes the expansion of the entire upper section of the road to two lanes which will require extensive retaining walls and massive earth moving, greatly impacting wildlife, vegetation and hydrology, The resulting two lane road will also allow for higher speeds, potentially increasing risk of roadkill and accidents. In addition, the infrastructure required for Alternative 3 would affect the quality of the visitor experience, and could compromise one of the most ecologically significant areas and important wildlife corridors in the Sierra Nevada. The range of alternatives warrants further discussion with the public along with the environmental and social impacts. Some issues warranting further discussion follow.	The project team has noted your preference for Alternative 2. Alternative 2 was evaluated as part of the Planning and Environmental Linkages process. The rationale for dismissing Alternative 2 is provided in Section 2.1.2 - Alternatives Considered but Dismissed. The section states that "Alternative 2 was considered a feasible alternative, but did not meet the purpose and need as well as Alternatives 3 and 3a (the two-lane alternatives on the upper 2.5-mile segment) or Alternative 4 (combination one-lane/two-lane road on upper 2.5-mile segment with select areas of realignment on the 5.8-mile lower segment) because mobility and deteriorating roadway conditions would be addressed in fewer areas. Therefore, Alternative 2 has been dismissed from further consideration." Stakeholders and the public have been involved in the project development and alternative selection process through project scoping activities, stakeholder meetings (February 10, 2016), public meetings (March 20, 2017 and September 7, 2017), and environmental and social impacts have been studied, considered, and presented and made available to the public. See Section 4.0, Agency Coordination and Public Involvement, for additional information about stakeholder and public involvement.	YES, added reference to project website in Chapter 4.0.

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	3d	Emergency Response and Evacuation Both Alternatives 2 and 3 could improve visitor safety and emergency management, but either must be coupled with a proactive strategic plan that looks at how many visitors can be safely evacuated in a timely manner. The plan would need to identify safety zones, staging areas, methods of traffic management, and trigger points. There is no evidence provided that Alternative 3 would accomplish an emergency response more effectively, other than assuming two lanes are better 1.5/2. An essential component of emergency response and evacuation is recognizing that there is a carrying capacity of the number of vehicles at one time and that there are times of the year that most visitors are dependent on buses. A planned emergency strategy for quantifying the number of people that can be safely evacuated within an emergency time frame, and what methods would be used, is essential to determining what a successful evacuation strategy would be in the context of the number of people, buses, and vehicles in the valley. This plan must not only consider current visitation but also include anticipated increases in visitation. Although widening the road in the top 2.5 miles would increase traffic flow, this alone does not address the need to plan a realistic and reasonable evacuation and emergency response.	The project team has considered your statement regarding emergency response and evacuation in the valley. The roadway is the only vehicular access into and out of the valley. This makes the roadway the primary route for emergency access and evacuation. A two-lane road will function more efficiently and effectively in this context than a 1.5-lane road. Currently, emergency services are provided by Madera County under an MOU.	NO
	3e	Change in the Character of the Visitor Experience including Visual Impacts During the development of the DEPO General Management Plan, NPS and USFS, signed with an agreement in 2009 as cooperating partners that included the INF Forest Supervisor, DEPO Superintendent, USFS Regional Director, and NPS Regional Director. The USFS was actively engaged in the planning processes and public outreach including the development of the purpose, significance, and fundamental resources and values of the monument and Reds Meadow Valley. During civic engagement, the public expressed an appreciation for the rustic, undeveloped character of the valley and a sense of going back in time to a special place that is not extensively developed. Alternative 3 would change the character of valley with urbanization features of extensive retaining walls in the upper 2.5 miles of the road that would be visible from many locations in the valley. The visitor experience would be changed from a sense of going back into time to a special place by the urbanization of the road that would be of similar character to the experience of driving on the same type of road as within town. In Section 3.8, Visual Resources and the Visual Resource Impact simulations show only one simulation (8b) of the retaining wall at a single point along the long stretch of wall. However, the proposed length of the retaining wall is for a substantial amount of the upper 2.5 miles of the road. The visual resource assessment needs to thoroughly identify the impacts to the Visitor Experience of retaining walls that can be seen from multiple locations in the valley while hiking, driving, and other recreational experiences in the valley and likely from several wilderness trails.	The project team recognizes the importance of the visual character in the project area. The potential effects of the retaining walls on visitor experience were evaluated at an early stage in the visual assessment process. As indicated in the description of the selection of key observations points (KOPs) on page 14 of the Visual Impacts Assessment (located in the Draft EA/IS, Appendix E - Technical Studies) it was determined that “The only places off the road from which the road has the potential to be seen are from short segments of the Minaret Summit to Starkweather Lake Trail in the area close to the summit and just downslope from Reds Meadow Road. The users of this trail are assumed to have a high level of visual sensitivity.” It was for this reason that KOP 1 was selected to provide an understanding of the potential visual effects of the retaining wall on the hikers using the relatively nearby segment of the trail. No other trail segments were identified as having close views of areas that would be altered by the road improvements. Additionally, based on the assessment conducted, it was determined that views looking toward the retaining walls from the valley segment of Reds Meadow Road and also from major recreational use areas, the retaining walls would be substantially if not entirely screened by vegetation growing on the slopes below the walls as well as by vegetation in the foreground of the views. Because KOP 1 addresses the only area from which the proposed retaining walls would have the potential to have an effect of any consequence on visitor views and experience, it provides a thorough evaluation of the retaining walls' potential visual impacts. Additionally, KOPs 2 through 4 provide views of the road into the valley as it now exists and simulations of these views as they would appear with the road improvements in place. These views and their corresponding simulations provide an adequate basis for determining the nature and extent of alterations to the visual character of the road. Comparison of the existing and proposed project views indicate that with the proposed improvements, the road would be slightly wider, would be striped, and would have barriers in some areas on the road’s downslope side. In addition, the surrounding vegetation would encroach less on the roadway corridor. The proposed roadway improvements would bring about some detectable changes to the views seen in KOPs 2 through 4, but these changes would be incremental in nature and would not completely transform the roadway’s appearance and visual quality. Based on a review of the changes seen in the views from KOPs 2-4, the assertion that the roadway improvements would result in “urbanization” of the road’s character appears to be an unsupported overstatement. Similarly, review of the simulations prepared for KOPs 2-4, does not support the assertion that “the road that would be of similar character to the experience of driving on the same type of road as within town”. A typical urban roadway would be different in many ways, including fewer curves, less encroaching vegetation, and more roadside infrastructure (street lights, utility boxes, and overhead power and communications lines). In addition, the context of an urban roadway would be different as well, passing through developed areas as opposed to natural appearing forest lands. Rather than looking like an urban roadway, the improved roadway will appear similar to roadways commonly developed on National Park Service (NPS) lands and lands in areas of high recreational use administered by the USFS and Bureau of Land Management.	NO

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Written Comments from the Public During Comment Period				
	3f	Ecological Significance of the Reds Meadow Valley and its contribution to Connectivity of Species and Migratory Corridors The Reds Meadow Valley is a critical component of the watershed of the Upper Middle Fork of San Joaquin watershed. The Minaret Vista Pass and Mammoth Pass are the lowest points in the Sierra Divide between the Eastern Sierra/Great Basin ecosystems and Sierra Nevada ecosystem. It is the place in the Sierra Nevada where mixing of both floral and faunal species from these different biogeographical regions result in high biodiversity. For example, there is a mixing of Sierra Nevada old growth red fir forests on both sides of the Minaret Vista and Reds Meadow Valley, and aspen, juniper and sage of the Great Basin within the valley. The low passes, San Joaquin River watershed, and biodiversity present in the valley is a key component of migratory corridors and habitat connectivity. The importance of this area has been identified in the CA multiple agency report on California Essential Habitat and Connectivity Project.	Comment noted. Please see response to comment 1d.	NO
	3g	Wildlife and Vegetation Impacts Wildlife Impacts need to be more thoroughly addressed both during construction and after project completion. Integrating the habitat connectivity and migratory corridor impacts into alternatives analysis is needed. During construction, accommodation for nesting birds and animal dens along the road corridor are needed. A baseline study would be ideal. As much of the construction will occur in the sensitive nesting and denning season, noise free periods in the morning hours when most wildlife communication occurs is recommended. NPS integrates this into administrative management of noise impacts by managing to minimize administratively caused sounds with a “Save the Dawn” wildlife protection practice. During construction, night lighting should be minimized and managed to reduce impacts to bats. Research shows that bat behavior and travel are impacted by artificial lighting. Thirteen bat species are known to occupy the monument and therefore are likely to occur in other areas of the valley. Three have been identified as having special status due to low population levels or high degree of threat from stressors (pallid bat- Antrozous pallidus, western red bat - Lasiurus blosservillii and fringed myotis- Myotis thysanoides). Wildlife roadkill is a concern both during construction and after project completion. The Reds Meadow Valley is an area of high biodiversity and a migratory corridor between the Sierra and Great Basin as identified by the California Habitat and Connectivity Plan. Roads provide easier passage for wildlife, and many sightings occur on the roads especially from Agnew Meadow to Minaret Vista. These sightings are reported to DEPO staff and include porcupines, bears, deer, martens, squirrels, chipmunks, and grouse. Roadkill is also reported to DEPO staff and USFS staff at Minaret Vista. The probability of increased roadkill needs to be mitigated by speed limits, signs at wildlife crossings including watercourses, and speed deterrents on the road. The retaining wall over a substantial length of upper 2.5 miles will likely be a barrier to wildlife travel and needs to be addressed. Current road conditions allow wildlife to move up and down steep slopes while the proposed retaining walls present a large drop-off that few animals can navigate without injury. A more rigorous evaluation of impacts of each Alternative to the biodiversity of the valley and connectivity, as well as mitigations, needs to be conducted. Several suggestions are included in these comments.	The project team recognizes the importance of local biological resources. Please see responses to comments regarding impacts to wildlife in comments 1d, 1e, and 1f. With regards to implementing daytime restrictions on construction please see response to comment 1j. Please see response to comment 1k that addresses impacts to bats in the project area. The Final EA/IS Errata has been updated with the information provided by commenter regarding three additional species of bat (pallid, Townsend's big-eared, and western red bat). Please see revisions to Section 3.3.2 of the Final EA/IS Errata. The BA/BE identified protected species likely to occur in the Biological Study Area, one of which was a bat species, *Yuma myotis*. Nighttime work will be completed in a manner to be as least invasive as possible by minimizing noise and light outside of the construction site as much as possible. Mitigation measures to reduce impacts to bats has been added to Section 3.3.3 of the Final EA/IS Errata. All clearing and grubbing construction activities would occur after September 1 and before February 15 to avoid nesting season. If clearing or grubbing occurs between September 1 and February 15 a qualified biologist would survey for nesting birds. The project will comply with the Migratory Bird Treaty Act and observe CDFW Code related to bird nesting. Additionally, workers will be trained on identification of the Yosemite toad and migratory birds. Existing evidence does not support that a high number of roadkill or wildlife injuries due to incidents with vehicles is an existing problem or will be a problem exacerbated by the preferred alternative. Wildlife signage will be considered during subsequent design stages to notify roadway users of the potential for wildlife crossing the roadway. Widening the roadway cross section will also afford drivers additional space to avoid wildlife, if needed. Once the reconstructed roadway is operational, the Town of Mammoth Lakes will record wildlife collision as part of the Statewide Integrated Traffic Records System.	YES, updated Final EA/IS Errata text to include the two-bat species and the summary of the evaluation results. The bats are included on the USFS Region 5 sensitive species list but not included in the 5-mile buffer used to determine occurrences.

Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
	3h	Wetland impacts: On page 28, the DEA states that none of the areas identified by the National Wetland Inventory (NWI) survey are jurisdictional wetlands because of the absence of hydric soils. While these areas may not be jurisdictional, they are incredibly important ecologically and impacts should be assessed and minimized.	The project team recognizes the importance of aquatic resources in the project area. The project will comply with applicable federal laws governing water resources and water quality, including obtaining applicable permits. Section 3.2, Water Quality and Resource evaluates impacts to water features in the study area, including potentially jurisdictional features. The evaluation of jurisdictional water features, not limited to wetlands, was informed by an Aquatic Resource Delineation Report located in Appendix E of the Draft EA/IS. FHWA's priority is to avoid impacts to aquatic resources, then minimize, and then mitigate for impacts. The project team will make the determinations on minimization and mitigation measures. Section 3.2 provides anticipated impacts to water features and water quality, and measures to avoid, minimize, and/or mitigate impacts. An example of avoiding impacts to water resources has already occurred, with the elimination of a potential alignment at Agnew Meadows. Additionally, as design progresses the design team will continue to look at design refinements to first avoid, then minimize impacts to jurisdictional resources, riparian areas, and other non-jurisdictional resources.	NO
	3i	Alternative 4 NPS comments on the proposed realignment of the road at the turnoff from Reds Meadow Road to Devils Postpile Access Road are that this alternative warrants further discussion. Several improvements have occurred in the past few years through collaboration with INF and DEPO with several safety improvements implemented. In the proposed road realignment, there is an area that the INF identified a seep area that contains a rare plant and other biota in previous collaborations on blowdown response and an interagency prescribed burn. The effect of the realignment on this area needs to be assessed.	The project team recognizes the importance of local ecosystems, such as seems, as well as rare plant and animal species. The project team will continue to work with NPS during implementation of the project, regardless whether the design option at the Devils Postpile is included in final design. The study area used for the Project's aquatic resource delineation report and biological assessment bumps out in the area of the design option, so that the design option is included in that study area. USFWS has reviewed the biological assessment for the project and concurs with its conclusion. Additionally, the project will implement best management practices (BMPs) and mitigation measures to reduce impacts to natural areas and water resources caused by the project to the extent applicable.	NO
	3j	Cumulative Impacts In April 2017, the TOML requested a letter of support from DEPO during the submission for the Reds Meadow Improvement Project to the FLAP grant. DEPO provided a letter of support and an offer of a $500,000 federal match with the condition that the partners collaborate to find solutions for the periods of vehicle congestion and exceedances of the parking capacity at DEPO that compromise visitor safety and experience. The TOML agreed to these conditions and the INF agreed in concept. As one of the mitigations of this project, along with others identified in this letter, these partners should develop an MOU to formalize the shared goals to proactively identify solutions to an existing condition that will continue to grow with the cumulative effects of this road expansion, the adjacent development of the KSL-Mammoth Mountain Resort, and ever increasing visitation with the successful marketing by Mammoth Lakes Tourism to the monument.	The project team recognizes the existing vehicle congestion in the valley. The proposed added roadway width in the upper segment, as part of the Preferred Alternative, is a safety feature. The project is not anticipated to increase the volume of traffic on Reds Meadow Road. The improvements being made to Reds Meadow Road are to remedy deteriorated roadway conditions; maintain access, mobility, and safety; and increase emergency response/evacuation capabilities. The improvements do not serve as a new source of traffic generation. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles into the valley will be consistent with the existing conditions. Therefore, no cumulative effects in the form of increased traffic volumes resulting from implementation of the Preferred Alternative are anticipated, and no mitigation is required. Should changes to visitor management of the valley be implemented, those changes would require a separate action, which may require independent analysis, documentation, and approval under the NEPA	NO
	3k	The DEA needs to address that this project will further increase the growing numbers and frequency of vehicles on the road due to increase in the capacity of the road with the expansion to two lanes in the upper 2.5 miles. There is a history of challenges and efforts to address the cumulative and ever increasing impacts of vehicles and visitation, and the road expansion will intensify and accelerate the growth curve. For example, in 1976 the Inyo National Forest Recreation Plan and Mono County Plan recommended a mandatory shuttle bus to provide a quality visitor experience and resource protection of the outstanding beauty and resources of the Reds Meadow Valley. Thereby, the USFS and NPS implemented a visitor use management strategy of coupling the paving of the narrow road from Minaret Vista through the Reds Meadows Valley, which was expected to increase visitation, with the initiation of a mandatory shuttle bus. With the proposed expansion of the road, solutions must be identified to mitigate the impacts of the project by expanding the forms of the shuttle bus service during the high visitation shoulder season, increased visitation in the peak season, congestion and parking management, and visitor safety strategies. The DEA does not directly address these impacts nor provide analysis of the increases in vehicle use expected with the expanded mobility and access of the road. There was an assumption that visitation would remain static without any determination or justification. However, this is an assumption that is unfounded and unlikely.	The project team has considered the assumption that implementation of the project will further increase traffic volumes in the valley. However, the project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than the Preferred Alternative, including management of traffic into the valley by USFS. USFS is not proposing the change their strategy for managing traffic volume or shuttle bus volume into the valley via Minaret Vista, as a part of this project. The proposed added roadway width in the upper segment, as part of the Preferred Alternative, is a safety feature. The improvements being proposed for Reds Meadow Road are to remedy deteriorated roadway conditions; maintain access, mobility, and safety; and increase emergency response/evacuation capabilities. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles into the valley will be consistent with the existing conditions, unless other courses of action are taken as a separate action. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under NEPA.	NO

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Written Comments from the Public During Comment Period				
	3l	Access, Mobility and Safety Access, Mobility and Safety are a shared concern of the NPS. An essential component of access, mobility, and safety is recognizing that there is a carrying capacity of the number of vehicles at one time in the valley when considering parking spaces, traffic flow and recreational activities. Simply expanding the road into two lanes for the upper 2.5 miles with some repair work on the lower section does not directly address access, mobility, and safety issues, rather increases the issues of traffic congestion, crowding, and exceedance of parking capacity. Cumulative impacts from the Reds Meadow Road expansion project will necessitate mitigation as a condition of the project and collaboration amongst stakeholders.	The Draft EA/IS compares alternatives against shared concerns regarding access, mobility, and safety. Section 2.3, Alternative 3, in the Draft EA/IS states "This alternative meets the purpose and need better than all other alternatives because mobility, safety, and deteriorating roadway conditions would be addressed in more areas." The project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than the Preferred Alternative, including management of traffic into the valley by USFS. USFS has jurisdiction over management of the carrying capacity of facilities in the Inyo National Forest. USFS is not proposing to change their strategy for managing traffic volume or shuttle bus volume in the valley as a part of this project. The lower segment of the roadway already consists of two 11-foot lanes, which will be rebuilt largely as-is, with the option for a short realignment in one area. The proposed roadway for the upper 2.5-mile segment is two 11-foot lanes and improvements are safety related. The project will improve the upper segment roadway width which will make that cross section consistent with the cross section in the lower segment of the roadway. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles into the valley will be consistent with the existing conditions, unless other courses of action are taken as a separate action, which may require independent analysis, documentation, and approval under NEPA.	NO
	3m	Mandatory Shuttle Bus When the mandatory shuttle bus is in operation from the staging area (currently at the Adventure Center) to DEPO and Reds Meadow, there will likely be increased bus traffic and congestion at DEPO destinations. With the current bus traffic management and communications between bus drivers, waiting for oncoming buses to pass by the turnout where the other bus waited, resulted in a defacto check and balance of the number and pacing of buses arriving at DEPO and the disembarking of visitors. However, two way traffic and no pacing of buses could lead to congested destination sites and long lines at comfort stations, resulting in a compromised visitor experience. While this may increase efficiency on the upper 2.5 miles of road, the impacts would be transferring the problems down the road to the destinations of the majority of visitors that is Devils Postpile National Monument. With the proposed two lanes of traffic on the first 2.5 miles of road, buses could go in and out of the valley more frequently and quickly, as the safety practice of waiting in turnouts until oncoming traffic passes will no longer be in effect. This will likely result in an increase of the number and frequency of buses, especially during peak visitation hours (mid-morning to mid-afternoon). This could result in more visitor crowding at key destinations of the Postpile and Rainbow Falls. Therefore, the frequency and timing of bus operations will need to be managed to insure visitor safety and quality of the experience. NPS has identified indicators and standards in the General Management Plan to develop visitor capacity management strategies. With the exponential growth in the last two years from an average of 100,000 visitors in 2013 to over 150,000 visitors in 2015 and 2016, it is critical to assess the impacts of the road expansion to two lanes, on the quality of the visitors experience and the finite capacity of the monument to manage vehicles and increase number of visitors while protecting natural and cultural resources. As a result of several visitor use studies, the DEPO General Management Plan (page 127) identified that an acceptable number of people at one time will not exceed 26 people at the Devils Postpile central viewing platform 90% of hours from 8am to 6pm; and 44 people at one time at the Rainbow Falls viewing platform 90% of hours from 8am to 6pm. Monitoring of these standards will occur every 1-3 years. The quality of the visitor experience has been impacted when this standard is exceeded on primarily on busy holiday weekends. If crowding were to occur more than 10% of the time, the direct method would include managing the timing and frequency of visitors alighting from buses. Indirect methods would potentially include management actions include education, signage, engineered protection, selective closures, and limited access.	The project team has considered the comment that a wider roadway will lead to increased bus traffic. However, the USFS manages the amount of shuttle buses entering the valley through an agreement with the shuttle service provider. Widening the upper segment of the roadway from 1.5 lanes to 2 lanes is not an action that would affect the number of buses entering the valley nor would it be a new source of traffic generation. A separate action, outside of the Preferred Alternative would need to occur to change shuttle frequency. Should changes to visitor management of the valley be implemented, those actions would require a separate action, which may require independent analysis, documentation, and approval under NEPA.	NO

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Written Comments from the Public During Comment Period				
		Proposed mitigation: Address increased mobility in the upper 2.5 miles and the impacts to traffic and congestion at the intersection of the Reds Meadow Road/Devils Postpile Access Road. At face value, this needs to be addressed in terms of the quantity, timing, and frequency of departing buses from the staging area.		
	3n	Shoulder seasons when Mandatory Shuttle bus service ends When the mandatory shuttle bus is not in operation from staging area (currently at Adventure Center) to DEPO and Reds Meadow, traffic congestion and lack of parking becomes an issue. As Superintendent of Devils Postpile since June 2000, I have frequently seen long queues and gridlock in the upper 2.5 miles when vehicles cannot pass each other. This occurred when there were many more vehicles in the valley than parking spaces and no traffic management strategies were in place. These situations have occurred during early opening such as for Memorial Day (when there was no mandatory shuttle bus), and when fall visitation greatly exceeded the parking capacity of the valley, including the October holiday weekend. Simply widening the road in the upper 2.5 miles will not address this congestion issue, but rather transfer the problem to the Devils Postpile Access Road, the overflow parking at the overnight hiker parking lot and southward on the Reds Meadow Access Road. When the parking capacity is exceeded at DEPO, vehicles begin parking along the narrow road heading southward, blocking visibility for oncoming traffic and creating traffic hazards for people. When these roadside incursions are maxed out, then visitors fill up the lot at Rainbow Falls Trailhead, parking haphazardly in the rough lot and driving into the forest, and/or they proceed to the Reds Meadow Resort. However, often all lots fill up on busy weekends and then active parking management is required from 2- 6 hours/day USFS, NPS, ESTA, and TOML have been exploring some solutions to the congestion and safety hazards due to congestion with an intervalley shuttle between DEPO and Reds Meadow Resort. This significantly decreases the congestion at DEPO, which is the primary destination for approximately 90% of the visitors to the valley. Proposed action: Provide operations and fund an intervalley shuttle when the mandatory shuttle bus is not in operation as an integral strategy for managing for mobility and access. Multiple funding sources would need to be explored.	The project team recognizes that traffic congestion and parking area an issue in the valley. The Preferred Alternative will address gridlock situations, caused by vehicles that cannot pass each other. Extending the width of the roadway will provide vehicles enough space to pass each other. This will provide an upgraded condition for both access to the valley (visitors and emergency response/evacuations) and safety (substandard driving conditions and emergency response/evacuations). The project is not anticipated to increase the traffic volume on Reds Meadow Road. No other conditions in the valley will change other than the Preferred Alternative, including management of traffic into the valley by USFS during the shoulder season. USFS has jurisdiction over management of the carrying capacity of facilities in the Inyo National Forest. USFS is not proposing the change their strategy for managing traffic volume in the valley as a part of this project. Should changes to visitor management of the valley be implemented, those actions would require a separate action. The proposed improvements, without changes to other conditions are not likely to generate additional trips to the valley beyond what would have been generated under the existing conditions. Because traffic volume is not expected to substantially increase due to the project, the project will have no substantial impacts on parking. Additionally, if there is evidence that parking is already limiting the number of visitors staying in the valley then that will continue to be a limiting factor. Solutions for at-capacity parking conditions are not within the scope of this project or required as mitigation.	NO
	3o	Safety Issues including Traffic/Transportation, Pedestrians and Bicycles The improvements to the deteriorated road will address some safety concerns but result in additional concerns. One of the concerns is the increase in speeding of vehicles. Currently, many drivers are compelled to drive more carefully and slowly. There are no known recorded fatalities and injuries in the upper 2.5 miles. It is partly true that by offsetting inadequate sight distance at curves coupled with narrow shoulders may reduce safety risks for passing of on-coming vehicles, however, with the urbanization of the road, people are likely to drive faster and less cautiously. There are several studies that connect speeding with collisions. Drivers are more cautious on mountain roads for their own safety. With an increase in width and visibility and a sense that the road is similar to the standards of a road in TOML, vehicle speed is likely to increase, thus increasing the risk of injury to humans and wildlife (roadkill). Wildlife often uses the road as a corridor for travel, and is also an enhancement to the visitors' experience. Therefore mitigations to protect human and wildlife are needed. Several mitigations have been suggested in the comments on wildlife, however, both engineered ways to decrease speed along with a more wildlife friendly design is integral. There are several locations after the 2.5 mile upper road, where visitors frequently cross the road to access trails. This occurs when other parking lots are full, or when campers cross the road to catch the bus or get to a trail. These areas need to have lower speed limits, speed bumps, and painted crosswalks to alert drivers and direct walkers.	The project team recognizes that the NPS is concerned with drivers not observing the speed limit when the Preferred Alternative is implemented. The roadway is unsafe according to modern roadway standards. The threshold for safety is not a prescribed number of human fatalities. The existing width on the upper segment is currently 16-21 feet and the proposed travel way width is 22 feet. This maximum 5-foot width increase in select areas of the upper segment's travel way, not including the shoulder, will not warrant an increase in speed limit. The roadway's setting (mountainous) will continue to remind drivers that this is not an "urban" roadway. Additionally, the project is not changing the horizontal alignment of the roadway, keeping in place some substandard curves, in an effort to avoid and minimize environmental impacts, and retain the existing character of the area. Sign placement for speed limit signs, animal crossings, trail crossings, and sharp curves will be decided during final design. Striping in the upper 2.5-mile segment would be a safety improvement over the existing conditions. Speed limit enforcement protocols are outside of the purview of this project. Once the reconstructed roadway is operational, the Town of Mammoth Lakes will record wildlife collision as part of the Statewide Integrated Traffic Records System.	NO

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Written Comments from the Public During Comment Period				
	3p	Adding a bicycle lane to the upper 2.5 miles of road, would create additional environmental impacts requiring mass movements of earth and possibly increasing needs for retaining walls. Additionally, encouraging expanded bicycle usage on the road that would accommodate larger groups of commercial and amateur bicycle touring groups, would create down road impacts on DEPO which does not have a bicycle lane.	The project team recognizes that the NPS is concerned with the proposed multiple-use shoulder design option. The design option is as a standard-sized shoulder and has been evaluated and included as a potential feature that would accommodate multiple potential uses, including bicyclists, vehicle refuge, or added space to maneuver around obstacles (i.e., rocks, tree limbs, animals). Implementation of the 4-foot multi-use shoulder design option increases the amount of retaining walls by approximately 400 linear feet but also decreases slope improvements by approximately 400 linear feet. The decision to implement the design option as part of the Preferred Alternative will be made by project partners in a subsequent design phase, that may include potential funding shortfalls.	NO
	3q	Proposed mitigation: Maintain existing speed limits and implement deterrents to speeding such as speed bumps, and locating and adding painted crosswalks at pedestrian crossings of the road. These mitigations would also meet the stated purpose of USFS to improve safety.	The project team has considered the proposed mitigation. The posted speed limit for the upper and lower segments is not changing as a part of this project. Signing and striping would be replaced in-kind at trail crossings. Other signing and striping will be determined during final design. Striping in the upper 2.5-mile segment is anticipated to serve as a safety improvement over the existing conditions. CFL and USFS will consider safety for all modes along the corridor as well as animal safety. See response to comment 1g, regarding speed bumps.	NO
	3r	Interrelated Efficiencies, Opportunities and Critical Needs Utilities With the goal of providing access to recreational resources of the Reds Meadow Valley and DEPO several essential visitor services need to be addressed during the planning and implementation process. During this process, agencies should develop a cohesive plan for utility systems that will be exposed in the road repair, and develop efficiencies as mitigation to the proposed project. These include Infrastructure and Utilities.	The Preferred Alternative will avoid, minimize, and/or mitigate potential impacts to utilities within the roadway envelope that will be exposed during construction. The existing infrastructure is expected to be protected in place or relocated within the existing roadway envelope. A conduit that could accommodate fiber optic cable may also be added underground in the corridor during construction. Further investigation of utilities will be conducted in concert with subsequent design phases. While the project is not proposed in concert with utility upgrades, if outside funding from NPS/USFS is provided early enough in the design process, FHWA can evaluate the feasibility of adding these utility upgrades to the project, within the existing roadway prism.	NO
	3s	**Sewage Management** An important component of recreational resources is providing for the basic needs of visitors and a quality visitor experience. One of the most immediate visitor needs is access to clean comfort stations. Since the 1980's, the USFS and NPS have both been dependent on the sewer line that goes along Reds Meadow Valley Road to the leach field and septic tanks at Rainbow Falls Trailhead. This is essential for providing visitor services to the average of 150,000 visitors to DEPO from late May to mid-October. Vault toilets are not a feasible option for this number of visitors at DEPO, so the NPS and USFS need to agree on and begin implementation of the solution n to this basic visitor need. Currently, the sewer line from DEPO to USFS Rainbow Falls Trailhead is buried beneath the Reds Meadow Road. This provides both opportunities and challenges. The unearthing of the road provides an opportunity for replacement of this deteriorated infrastructure. Currently, NPS has this in the 2019-2020 queue for consideration of funding with a potential cost share of 50%. By coordinating an agreement on the future of the USFS Rainbow Falls Trailhead leach field and septic system or another viable option, a cost efficient implementation of the replacement of the sewer line when the roadbed is exposed is feasible. If the proposed realignment of the Reds Meadow Road and DEPO Access road occurs, then part of this critical infrastructure would need to be rerouted. Proposed action: Initiate cooperative planning and project implementation for the sewage management of INF and DEPO in fall 2017.	The project team recognizes that sanitary sewer service is an important aspect of providing visitors with a quality experience. The EA notes the sanitary sewer as an existing condition in Section 3.9.1. The proposed pulverizing and paving activities are not anticipated to impacts the existing sewer and the existing infrastructure is expected to be protected in place or relocated within the existing roadway envelope. Further investigation of utilities will be conducted in concert with subsequent design phases. If NPS and USFS wish to consider system upgrades, that would need to be funded separately from the FLAP funds. If separate funding is identified early in design FHWA can evaluate the feasibility of adding the upgrades to the project, within the existing roadway prism. Active coordination with utility users and providers will be provided during the design and construction process.	NO

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Written Comments from the Public During Comment Period				
	3t	Electrical and Phone Lines During the road improvements and repairs for the entire road project, damage to existing electrical and phone lines, and the opportunity for replacement need to be identified. There is also the likelihood that during the project there would be extended power outages to sites in the valley including DEPO, and disruption of landlines. Communication on planned outages and emergency communications need to be identified in the planning and mitigations of the road work. The cell phone connectivity is limited, and what connectivity that previously existed appears to be altered after the 2017 winter, so this is not a consistently dependable source for emergency communications for visitors and employees within the valley.	The project team recognizes the importance of electrical and phone service to users in the valley. Further investigation of utilities will be conducted in concert with subsequent design phases. Quality and alignment of existing utilities will be evaluated at that time. Active coordination with utility users and providers will be provided during that process.	NO
	3u	An opportunity to consider in this project that is interdependent in planning for cumulative impacts is the location of the Minaret Vista entrance station and the management of visitor access. As ease of access increases, the need for managing numbers of vehicles into the Reds Meadow Valley and DEPO will increase. As part of a comprehensive strategy to manage traffic congestion/parking capacity, strategic planning is a necessary mitigation for the proposed project that should be included in the MOU.	The project team recognizes that visitor management is an important component to the operation of Reds Meadow Road. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles into the valley will be consistent with the existing conditions, unless other courses of action are taken as a separate action; therefore, no cumulative impacts due to increases in traffic volume, caused by the Preferred Alternative, are anticipated. Should changes to visitor management of the valley be implemented, those actions would require a separate action.	NO
	3v	3.2 Air Quality Significant impacts to air quality will occur to these pristine areas that need to be minimized and mitigated. The affected area is not the San Joaquin Valley of Madera County. Comparing the impacts of the project to the overall air quality in Madera County does not recognize the natural and pristine values of the Reds Meadow Valley and the visitor experience. The project area is in close proximity to a Class 1 Airshed which includes Ansel Adams and John Muir Wilderness areas. Air quality advisories are posted for visitors due to smoke conditions. Will Air Quality Advisories be posted by project management to inform visitors of what to expect and what mitigations are being implemented? Many visitors such as sensitive groups, children, and elders need to make decisions based on air quality. Proposed mitigation: Air Quality controls should be maximized and impacts minimized and mitigated, and air quality advisories issued on a daily basis during the course of the construction.	The project team understands the stated concerns regarding air quality. The project will adhere to federal regulations governing air quality, air quality management, and determining impacts to air quality included in the Federal Clean Air Act and implemented by the EPA. The project is located in Madera County within the San Joaquin Valley Air Quality Basin, and is in a non-attainment area. The project is exempt from conformity requirements due to its proposed safety improvements per 40 CFR 93. Since the project will not increase or induce traffic into the valley, no long-term increase in airborne pollution from the project is anticipated. As described in Section 3.7.2 in the Environmental Assessment, the construction-related impacts to air quality are projected to be less than significant and the project will implement measures to avoid, minimize, and/or mitigate those impacts, as applicable.	YES, changed text to read "The project is located in Madera County within the San Joaquin Valley Air Basin" in section 3.7.1.
	3w	3.2 Water Quality and List of Environmental Commitments: NPS notes that heightened attention is needed for the to Spill Response Plan and Stormwater Management at the Reds Meadow Road/DEPO access intersection, and angles of impervious surfaces and stormwater runoff. The DEPO access road has a steep grade, that gathers stormwater and hazardous materials that leads to the eligible Wild and Scenic San Joaquin River and the sensitive wetlands of Soda Springs Meadow. Previously, a contractor applied an emulsion to a chip seal in rain and cold weather that resulted in a near contamination of the San Joaquin River due of stormwater and an oil spill of the emulsion as it accumulated and accelerated down the steep grade of the Devils Postpile Access Road and headed towards and missed by less than a 150 feet the San Joaquin River and even closer to the Soda Springs meadow.	The project team understands NPS's concerns with water quality during construction and implementation of the project. The project will conform to the requirements of the Clean Water Act, including conditions of the National Pollutant Discharge Elimination System (NPDES) permit. Measures to avoid, minimize, and/or mitigate impacts to water resources and water quality are listed in Section 3.2.4 in the Daft EA/IS.	NO

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Written Comments from the Public During Comment Period				
	3x	Table 3.1 Resource Determination and Rationale for Determination (page 26) Wild and Scenic Rivers: Not Present-- Neither the Middle Fork San Joaquin River nor its tributaries in the larger valley are listed as a National Wild & Scenic River. The Middle Fork of the San Joaquin River (MFSJR) was found eligible for wild and scenic river designation, under Section 5(d)(1) of the Act, in a 1991 eligibility study (Sierra National Forest, 1991). Due to its eligibility, the river must be protected as a potential addition to the national system of wild and scenic rivers, until a "suitability analysis" is completed and a subsequent decision is made. Twenty-two miles have been determined eligible from near the headwaters at Thousand Island Lake to the confluence with the North Fork of the San Joaquin. This is documented in appendix E of the Devils Postpile General Management Plan and in several of the public outreach newsletters with maps showing the four sections of the river with their outstanding and remarkable values. The USFS-Inyo National Forest was a cooperating agency in participated in development and review of the plan, newsletters, and public outreach meetings.	The Final EA/IS Errata has been revised to indicate that the Middle Fork of the San Joaquin River is eligible for Wild and Scenic River Act designation. The project is located adjacent to segments 1, 2, and 3 of the Middle Fork of the San Joaquin River, approximately 200 feet from the river at its closest point, and at no point within the prism of the river. Eligibility for designation as a Wild and Scenic River requires that the free-flowing condition, outstanding remarkable values (ORVs), water quality, and classification of the river must be protected in case the river is added to the Wild and Scenic Rivers program. With implementation of BMPs and mitigation measures, the Preferred Alternative would have no adverse effect or measurable impact to the free-flowing condition, ORVs, water quality or classification of the river or its eligibility as a Wild and Scenic River.	YES, added that the Middle Fork of the San Joaquin River is eligible for Wild and Scenic River Act designation. With implementation of BMP and mitigation measures, Preferred Alternative would not have an adverse effect or measurable impacts on the free-flowing condition, ORVs, water quality, or classification of the river.
	3y	Table 3.1 Floodplains: Not present Parts of the project are likely within the floodplain of the San Joaquin River and certainly cross tributaries and drainages leading to the San Joaquin River and associated floodplains. It is not an appropriate or equal standard to apply an urban standard from Madera County to a pristine area in the Reds Meadow Valley. Additionally, the justification provided in the table for not analyzing potential impacts is because no analysis of flood hazards has been conducted, does not meet the need for a rigorous evaluation of impacts.	The project team recognizes the importance of avoiding and minimizing impacts to floodplains and from flood hazards. Flooding hazards are generally associated with high water events in streams and rivers, and the risk posed on people and infrastructure (homes, buildings, bridges, levees, culverts, etc.). Reds Meadow Road is located within a designed Zone D by the Federal Emergency Management Agency (FEMA), which corresponds to areas with undetermined flood hazards. Floodplain analysis requires floodplain data. If there is no established floodplain then there can be no quantifiable impacts to a floodplain. Additionally, USFS has not identified areas along Reds Meadow Road with a history of flooding. The Reds Meadow Road Project proposes to evaluate the structural condition of the existing cross culverts and replace them with equal or larger culverts based on appropriate engineering design evaluations. The design will not raise the grade of the existing roadway cross section, and will not change floodplain elevations.	NO
	3z	Table 3.1 Noise: Present/not affected The table needs to include the impacts of noise on wildlife and visitor experience including sensitive times of nesting and denning as described in comments in section 3.	The project team has considered the recommendation for including the impacts of noise on wildlife and visitor experience. Construction-related noise effects on visitors is discussed in Section 3.4.2 in the Draft EA/IS. The analysis of biological resources notes that construction activities could result in disturbance of general wildlife. The measures to avoid, minimize, and/or mitigate construction-related noise impacts are noted in Table 3-1.	NO
	3aa	Table 3.1 Greenhouse Gases: negligible. The description states that the project would not increase roadway capacity and that traffic volume is not anticipated to substantially increase. Additionally, the Minaret Vista USFS entrance station controls the volume of traffic entering the valley (although there is no discussion on how and when this is controlled). Therefore, the project would not introduce increased amounts of greenhouses over the long-term. Greenhouse gas emissions will be increased with increased visitation unless mitigated by increases in the mandatory shuttle bus or vehicle restrictions at the Minaret Vista Station. NPS and USFS need to work together to manage the capacity of the road, how to manage the number of vehicles entering the valley and GHG emissions Proposed action: In order to accomplish no net increase in GHG due to increased traffic volume, the USFS needs to have a vehicle capacity management plan developed and implemented, that includes monitoring and adaptive management.	The project team understands your concern regarding greenhouse gases. The project is not anticipated to increase the volume of traffic on Reds Meadow Road. The improvements being made to Reds Meadow Road are to remedy deteriorated roadway conditions; maintain access, mobility, and safety; and increase emergency response/evacuation capabilities. Post-project implementation conditions of USFS facilities and policies managing visitation and vehicles into the valley will be consistent with the existing conditions unless other courses of action are taken as a separate action. Should changes to visitor management of the valley be implemented, those actions would require a separate action.	NO
	3bb	Figure 1, Figure 5, Figure 6, Figure 7, Figure 8a. The maps of Devils Postpile National Monument are not complete. The monument is a rectangle, and it looks like the section that is the Ansel Adams wilderness within the monument is not included.	The project team understands your comment regarding the boundary of Devils Postpile National Monument. The boundary of Devils Postpile National Monument has been revised in Figures 1, 5, 6, 7, and 8a.	YES, replaced the boundary of Devils Postpile National Monument in Figures 1, 5, 6, 7, and 8a with the boundary used in the PEL.
	3cc	Figure 3.2: The Mono County Line is not at Thousand Island Lake rather along the San Joaquin Ridge	Unable to find "Figure 3.2"	NO

Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
	3dd	Page 27: Reds Creek originates from the east below Mammoth Mt. Not the Ritter Range.	Reds Creek does originate from the east, below Mammoth Mountain. The Final EA/IS Errata has been revised.	YES, updated text in Section 3.2.2 of Final EA/IS Errata to indicate Reds Creek originates below Mammoth Mountain.
	3ee	Page 28: Starkweather and Sotcher Lakes are in the valley and are not alpine but upper montane. Reds Lake is well to the east on Mammoth Mountain.	Starkweather Lake and Sotcher Lake are considered lower montane. Reference to Mammoth Lake has been removed from the Final EA/IS Errata.	YES, revise discussion of Starkweather Lake and Sotcher Lake in Section 2.2.2 of Final EA/IS Errata. Removed reference to Reds Lake.
	3ff	Page 50: fork Mono, should be North Fork Mono	The Final EA/IS Errata has been updated to read “North Fork Mono.”	YES, changed the text in Section 3.5.1 of the Final EA/IS Errata to "North Fork Mono".
	3gg	Appendix E, Page 21. Require the use of weed free erosion control materials such as coir or excelsior	The project team has considered your comment to use weed free erosion control materials such as coir or excelsior. Applicable measures to protect the project area from invasive species will be implemented under the direction of the forest botanist. USFS and USFWS have concurred with this approach.	NO
	3hh	Appendix D: Federal Highway Administration (FHWA) and Federal Transit Administration. 2005. Field Report, Devil’s Postpile National Monument. June 1. The date of this report is misleading as it is not 2005 but a scan of 1999 information. The DEPO Superintendent, Wymond Eckhardt, retired in 2000, and the information is from 1999. There are several other field reports that are available upon request. These include: 2004-5 Reds Meadow-Devils Postpile Background Information and Regional Context interagency report 2007 Reds Meadow- Devils Postpile Transportation Case Study – VHB Vanasse Hangen Brustlin. NPS contracted the consultant team of VHB to conduct a transportation study in Reds Meadow Valley/Devils Postpile National Monument to analyze vehicle and bus use patterns on the Road and the shuttle bus system to assist in transportation planning. Data was collected on vehicles on the road, passing of oncoming cars, boarding's and alighting's at various shuttle bus stops.	The project team has reviewed the citation and document referenced in the comment. The data in the report cite the years for which the data represent, so these data are not misleading. The report provided to the project team has a handwritten date of June 1, 2005, and that is the date provided in the citation.	NO
	3ii	Northern goshawk: The table indicates that the area does not have sufficient cover for nesting yet there are nesting pairs within the valley (one in close proximity to the road just north of DEPO) which has been observed by INF and NPS for over a decade.	Please see response to comment 1l.	NO
	3jj	Yosemite toad: The most recent observation was at the DEPO campground which is less than ½ mile from the project area. The valley has not been surveyed.	The project team recognizes the importance of the local biological resources, including the Yosemite toad. USFS biologists were consulted regarding impacts of the proposed project on the Yosemite toad. The evaluation of the Yosemite toad within the study area has been reviewed by USFWS and the agency has provided concurrence on the analysis and results (see Appendix F of the Draft EA/IS for documentation of concurrence).	NO
	3kk	Sierra marten: The table indicates that there is not sufficient canopy cover yet martens are commonly seen (weekly) in and around DEPO.	Please see response to comment 1l.	NO
	3ll	Appendix E, Figure 2.1. There is a circle indicating habitat for Sierra yellow legged frog yet table 2.1 indicates that this species is not likely to be present and there is no suitable habitat	Figure 2.1 displays occurrence data for the frog. Further, Table 2.1 notes “potentially suitable habitat” is present.	NO
	3mm	Appendix E, Figure 2.1. Table 2.1 indicates that Tulare rockcress is not in the project area because it occurs at higher elevations yet the map shows a circle of suitable habitat within the project area	The project team recognizes the importance of local biological resources, including the Tulare rockcress. The project will comply with applicable federal laws regarding biological resources and implement reasonable and prudent measures to avoid, minimize, and/or mitigate direct and indirect impacts to general wildlife and vegetation communities. Table 3-4 in the Final EA/IS Errata has been updated to show potential to occur for the Tulare rockcress from “None” to “Moderate”; however, this does not change the finding of may affect individuals, but is not likely to result in a trend toward federal listing or loss of viability (MANL).	Yes, updated Table 3-4 in the Final EA/IS Errata.

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Written Comments from the Public During Comment Period				
	3nn	Appendix E, Figure 2.1. short-leaved hulsea is much more widespread in Reds Meadow Valley and Devils Postpile NM than indicated on the map.	Figure 2.1 shows CDFW occurrence data. While species may be more widespread, the state does not have more documented occurrences to support this claim.	NO
	3oo	Thank you for your consideration and integration of NPS concerns into this magnitude of a project NPS requests the selection of Alternative 2, and potentially Alternative 4 after rigorous review of impacts.	The project team has noted your preference for Alternative 2. Alternative 2 was evaluated as part of the Planning and Environmental Linkages process. The rationale for dismissing Alternative 2 is provided in Section 2.1.2 - Alternatives Considered but Dismissed. The section states that "Alternative 2 was considered a feasible alternative, but did not meet the purpose and need as well as Alternatives 3 and 3a (the two-lane alternatives on the upper 2.5-mile segment) or Alternative 4 (combination one-lane/two-lane road on upper 2.5-mile segment with select areas of realignment on the 5.8-mile lower segment) because mobility and deteriorating roadway conditions would be addressed in fewer areas. Therefore, Alternative 2 has been dismissed from further consideration." Alternative 4 was evaluated as part of the Planning and Environmental Linkages process. The rationale for dismissing Alternative 2 is provided in Section 2.1.2 - Alternatives Considered but Dismissed. The section states that "Alternative 4 was considered a feasible alternative and would also meet the purpose and need better than Alternatives 2 and 2a because mobility and deteriorating roadway conditions would be addressed in more areas of the lower roadway. However, Alternative 4 does not meet the purpose and need as well as Alternatives 3 and 3a because mobility and deteriorating roadway conditions would be addressed in fewer areas on the upper 2.5-mile segment. Therefore, Alternative 4 has been dismissed and is not evaluated further within this document."	NO
Julie A Vance, California Department of Fish and Wildlife	4a	The DEA/IS included in the MND prepared for this Project states that the Project is only subject to Federal regulatory protections and is not subject to California Fish and Game Code since the Project is occurring within United States Forest Service-owned property and no State funding will be used. However, in Appendix A of the DEA/IS, it states that the Town of Mammoth Lakes is a local funding partner, therefore, this Project is subject to CEQA and any State or local permits necessary for Project development, including an Incidental Take Permit (ITP) pursuant to Fish and Game Code Section 2081(b) if take of species listed pursuant to CESA and/or a Lake or Streambed Alteration Agreement pursuant to Fish and Game Code §1600 et seq., for impacts to the numerous streams and riparian habitat identified within the document, as well as additional Fish and Game Code sections referenced in this letter.	Although the Town of Mammoth Lakes is a local funding partner, as required by the FLAP program, the project limits are completely within USFS property. In addition, FHWA is ultimately responsible for bid letting, hiring a contractor, and construction of the project. Per California Fish and Game Code Section 1601, FHWA does not fall under the definition of an "entity" and is, therefore, exempt from the Lake and Streambed Alternation Permit.	NO
	4b	Nesting birds: Forested and/or riparian habitat in the Project area likely provides nesting substrate for migratory birds, including the State Species of Special Concern yellow warbler (Setophaga petechia) and olive-sided flycatcher (Contopus coopen). CDFW encourages Project implementation occur during the avian non-nesting season. However, if ground-disturbing activities must occur during the breeding season (February through mid-September), the Project proponent is responsible for ensuring that implementation does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above. CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys of active work areas for active nests no more than 10 days prior to the start of the Project and surveys cover a sufficient area around the work area to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts such as nest destruction, noise, vibration, odors, and movement of workers or equipment could affect nests. Prior to initiation of construction activities, CDFW recommends a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends the work causing that change cease and CDFW consulted for additional avoidance and minimization measures.	Mitigation measures to avoid disturbance of nesting birds can be found in Section 3.3.3 of the Draft EA/IS that includes surveys and buffers if vegetation removal occurs during the nesting season. If nesting birds are identified, coordination will occur with biologists from the USFS to provide guidance on appropriate buffers.	NO

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Written Comments from the Public During Comment Period				
		If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Variance from these no disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction area would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.		
	4c	Lake or Streambed Alteration: A tributary of the Middle Fork San Joaquin River, Reds Creek, and a network of several additional perennial and ephemeral streams intersect the Project area. In total, at least 12 channels cross the Project area. Construction activities associated with these features include replacing culverts and working within associated montane riparian areas. Impacts to waterways, identified in the DEA/IS, include temporary changes in grades and drainage patterns, sedimentation and pollution resulting from construction over waterways, and erosion of stockpiles and areas that have been cleared and grubbed. As a result, Project activities include potential substantial changes to the bed, bank, and channel of several features. That are jurisdictional pursuant to Fish and Game Code §1600 et seq., therefore notification is warranted. Fish & Game Code §1600 et seq. requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial. CDFW is required to comply with CEQA in the issuance of a Lake and Streambed Alteration Agreement. For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593. The DEA/IS references a formal wetland delineation prepared for the Project. Results of the delineation were not included in the documents sent to CDFW, so they are not commented on here. However, please note that while there is overlap, State and Federal definitions of wetlands differ. Therefore, CDFW recommends that any evaluation of aquatic features on-site include an evaluation of the portions of the Project that may be subject to the requirements of Fish and Game Section 1602. It is important to note that while accurate delineations by qualified individuals have resulted in more rapid review and response from the ACOE and CDFW, substandard or inaccurate delineations have resulted in unnecessary time delays for applicants due to insufficient, incomplete, or conflicting data. In addition, riparian habitat and wetlands are of extreme importance to a wide variety of plant and wildlife species. As described in the DEA/IS, montane riparian habitat is present within the Project area. CDFW considers Project-related impacts to these resources as potentially significant if they result in the net loss of acreage or habitat value. When impacts to wetland and riparian habitats are unavoidable, CDFW recommends compensation include creation of new habitat, preferably on-site, at a minimum of an acre-for-acre basis. CDFW also recommends compensation consider potential impacts to special-status resources posed by wetland creation. Wetlands that have been inadvertently created by leaks, dams or other structures, or failures in man-made water systems are not exempt from this recommendation. CDFW recommends fully addressing avoidance, minimization, and mitigation measures for activities subject to CDFW's lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq) and that these measures be included as enforceable mitigation in the Final MND prepared for this Project.	Please see response to comment 4a regarding the Stream Alteration Permit. Section 3.2 of the Draft EA/IS, Water Quality and Resource, evaluates impacts to water features in the study area, including potentially jurisdictional features. The evaluation of jurisdictional water features, not limited to wetlands, was informed by an Aquatic Resource Delineation Report located in Appendix E of the Draft EA/IS and an August 2017 Delineation Report that is in Appendix C of the FONSI/MND. FHWA's priority is to avoid impacts to aquatic resources, then minimize, and then mitigate for impacts. The project team will make the determinations on minimization and mitigation measures. Section 3.2 provides anticipated impacts to water features and water quality, and measures to avoid, minimize, and/or mitigate impacts. In addition, FHWA, as the lead agency, will be responsible for obtaining the CWA 401 permit from the RWQCB for waters of the State and will comply with any additional mitigation measures required under that permit.	NO

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Written Comments from the Public During Comment Period				
	4d	Pacific Fisher: Pacific fisher is known to occur in the Project area. Fishers use cavities in trees, snags, logs, rock areas, or slash piles. The DEA/IS prepared for the Project indicates that suitable habitat for Pacific fisher is present within the Project area and that construction activities will involve removal of vegetation, including forest trees. Despite this, no avoidance or minimization measures are described for the species. Pacific fisher is a candidate species for listing under CESA, therefore take is prohibited, absent the acquisition of an ITP pursuant to Section 2081 (b) of the Fish and Game Code. To avoid take, CDFW encourages Project implementation occur outside of the natal denning period (March 1 to May 15) and maternal denning period (May 16 to July 31). If Project activities must take place during these months, CDFW recommends that a species-specific pre-activity survey of active work areas take place within 14 days of initiation of construction activities. CDFW advises that the pre-activity survey be conducted by a qualified biologist experienced with this species and include a stand search for potential denning structures within the Project area and within a ¼-mile buffer. In addition, because the Project will take place on U.S. Forest Service property prior to initiation of construction, CDFW recommends contacting local government biological survey leaders to determine the presence of any collared fishers associated with any studies that may be taking place in the area. CDFW advises consultation with CDFW local biologists regarding results of pre-activity surveys. In the event of negative findings, CDFW recommends that consultation with CDFW include documentation demonstrating fisher are unlikely to be present in the vicinity of the Project area. Information submitted may include, but is not limited to, a full habitat assessment, protocol-level survey results, and research/survey results from Federal agencies or subject matter experts. If potential denning structures are detected before or during Project activities, CDFW recommends a qualified biologist conduct surveys for denning fisher activity utilizing established protocols for remote camera stations, such as the United States Forest Service "American marten, fisher, lynx and wolverine: survey methods for their detection" (Zielinski, W.J and T.E. Kucera, 1995). CDFW recommends survey results be submitted to CDFW for review. If a fisher den is located, consultation with CDFW is advised for input on options of how to proceed. Prior to consultation, CDFW recommends that construction be suspended within ¼ mile of the potential den site. CDFW recommends fully addressing avoidance, minimization, and mitigation measures for Pacific fisher and that these measures be included as enforceable mitigation in the Final MND prepared for this Project.	Information provided by the Inyo National Forest of surveys for Pacific fisher between 2002 and 2012 show no occurrence of fishers in or near the project area. The likelihood of encountering a fisher is extremely low. Reds Meadow Road typically opens in early to mid-June after plowing of the road has occurred. Construction therefore will not occur before this time and there would be no impacts to natal denning activity. Given the low probability of encountering a fisher in the project area, the need for species specific surveys is unwarranted. If vegetation is to be removed between February 15 and September 1, surveys for nesting birds will occur. If during these surveys, a fisher den is observed, USFS biologists will be consulted.	NO
	4f	Sierra Nevada Yellow-legged Frog: Sierra Nevada Yellow-legged Frog (SNYF) is known to occur in the Project area. The DEA/IS prepared for the Project indicates that suitable habitat for SNYF is present within the Project area, but the species was determined not to occur there based on the presence of bullfrogs and nonnative trout and lack of recent occurrences without adequate surveys of the Project area. Thus, the DEA/IS contains no species-specific avoidance or minimization measures. The Federal Register for Critical Habitat designation for the SNYF (USFWS, 2016) states that upland areas adjacent to, or surrounding, breeding and non-breeding aquatic stream habitats that provide area for feeding and movement, consist of an area extending 25 meters from the bank or shoreline of the watercourse.	USFS biologists were consulted regarding impacts of the proposed project on the Sierra Nevada yellow-legged frogs. The USFS biologist indicate no recent occurrences of the frogs in the vicinity of the project and the known occurrences of predatory species within the project area makes the presence of the frogs highly unlikely. The evaluation of the frogs within the study area has been reviewed by USFWS and the agency has provided concurrence on the analysis and results (see Appendix F of the Draft EA/IS for documentation of concurrence).	

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		CDFW recommends that a qualified biologist experienced in surveying for SNYF survey suitable habitat within active work areas and a 25-meter buffer within 14 days prior to the start of Project activities and submit survey results to CDFW. In the event of negative findings, CDFW recommends that consultation with CDFW include documentation demonstrating SNYF are unlikely to be present in the vicinity of the Project area. Information submitted may include, but is not limited to, a full habitat assessment, protocol-level survey results, and research/survey results from Federal agencies or subject matter experts. If any life stage of SNYF (i.e., egg, larva, adult) is detected, consultation with CDFW is advised for input on options of how to proceed. CDFW recommends fully addressing avoidance, minimization, and mitigation measures for SNYF and that these measures be included as enforceable mitigation in the Final		
	4g	Yosemite Toad: Yosemite toad occur in montane wet meadows and/or seasonal pools in lodgepole pine and subalpine forests. The DEA/IS prepared for the Project indicates that suitable habitat for Yosemite toad is present within the Project area, however, it contains no species-specific avoidance or minimization measures. CDFW recommends that a qualified biologist experienced in surveying for Yosemite toad survey suitable habitat within active work areas and a 25-foot buffer within 7 days prior to the start of Project activities and submit survey results to CDFW. CDFW further recommends that if any life stage of the species (i.e., egg, larva, adult) is detected within the Project area immediately prior to or during Project activities, they be allowed to move out of the area on their own volition. If this is not feasible, CDFW recommends that a qualified biologist who holds a Scientific Collecting Permit for the species, capture and relocate the toad(s) out of harm's way to the nearest suitable habitat following measures described in "The Declining Amphibian Task Force Fieldwork Code of Practice" (DAPTF 1998). CDFW recommends fully addressing avoidance, minimization, and mitigation measures for Yosemite toad and that these measures be included as enforceable mitigation in the Final MND prepared for this Project.	Please see response to comment 3jj.	NO
	4h	Bald Eagle: The DENIS prepared for the Project indicates that bald eagle (BAEA) are known to nest and forage within the vicinity of the Project area, however, it contains no species-specific avoidance or minimization measures. Because BAEA is a Fully Protected species and take cannot be authorized or permitted by CDFW, CDFW recommends that Project-related activities avoid the nesting season (February through July). If Project activities must take place during those months, CDFW recommends that a qualified biologist conduct protocol-level surveys of known territories for nesting activities no more than 30 days prior to the start of Project activity within a ¼-mile radius of active work areas. CDFW further advises that nesting territory surveys be conducted in accordance with CDFW's "Bald Eagle Breeding Survey Instructions" (CDFW 2017). If suitable habitat is present outside of known territories, CDFW recommends that a qualified biologist conduct surveys in accordance with the "Protocol for Evaluating Bald Eagle Habitat and Populations in California" (Jackman and Jenkins 2004). If an active nest is found, CDFW advises establishing a ½-mile no-disturbance buffer until the young have fledged and are no longer reliant on the nest site or parental care. If BAEA nests are detected and a ½-mile buffer is not feasible, consultation with CDFW is warranted to determine how to implement the Project and avoid take. CDFW recommends fully addressing avoidance, minimization, and mitigation measures for BAEA and that these measures be included as enforceable mitigation in the Final MND prepared for this Project.	The project will implement reasonable and prudent measures to avoid, minimize, and/or mitigate direct and indirect impacts to wildlife species as indicated in Section 3.3.3 of the EA/IS. This includes avoiding tree and vegetation removal during the bird nesting season. If vegetation removal occurs between February 15 and September 1, then surveys for nesting birds including raptors will be conducted in accordance with the Migratory Bird Treaty Act.	NO

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Written Comments from the Public During Comment Period				
	4i	California Spotted Owl and Northern Goshawk: The DENIS prepared for the Project indicates that California spotted owl (SPOW) and northern goshawk (NOGO) are known to occur within the vicinity of the Project area, however it contains no avoidance or minimization measures for these species. CDFW recommends that Project-related activities avoid the nesting season for SPOW and NOGO (March through June and midMarch through mid-August; respectively). If Project activities must take place during those months, CDFW recommends that a qualified biologist conduct protocol-level surveys for these species within the active work areas and a surrounding ¼-mile buffer, no more than 30 days prior to the start of Project activity at each site. CDFW recommends that surveys for SPOW be conducted in accordance with USFWS's (2012) "Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls" and that surveys for NOGO be conducted in accordance with United States Department of Agriculture's (2006) "Northern Goshawk Inventory and Monitoring Technical Guide." CDFW advises that surveys be conducted at appropriate times and concentrate on mature trees. If active nests are found, CDFW recommends establishing a minimum ¼-mile no-disturbance buffer until the young have fledged and are no longer reliant on the nest site or parental care. CDFW recommends fully addressing avoidance, minimization, and mitigation measures for SPOW and NOGO and that these measures be included as enforceable mitigation in the Final MND prepared for this Project.	Please see response to comment 1l. As stated in that response, the project will implement reasonable and prudent measures to avoid, minimize, and/or mitigate direct and indirect impacts to wildlife species as indicated in Section 3.3.3 of the EA/IS. This includes avoiding tree and vegetation removal during the bird nesting season. If vegetation removal occurs between February 15 and September 1, then surveys for nesting birds including raptors will be conducted in accordance with the Migratory Bird Treaty Act.	NO
	4j	ENVIRONMENTAL DATA CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.	Thank you for your comment. Sensitive species data that results from project surveys will be reported to the California Natural Diversity Database (CNDDB).	NO
Lynn Boulton, Range of Light Group-Toiyabe Chapter(2)	5	I was wondering how tall the retaining wall would be at its highest point? I didn't see it mentioned in the EA/IS. Has that been worked out yet?	Based on conceptual preliminary design, wall heights will vary along the corridor, but we can expect walls up to around 13-foot-tall in localized areas. Keep in mind that this is a conservative estimate and will be refined as design progresses. The project footprint analyzed in the environmental documents covers anticipated design refinements.	NO
John Armstrong	6	Fully supportive of the project for our guests and for local recreation. Public transit offers a great solution for access to the backcountry on this road.	Thank you for your comment and support of the project.	NO
Verbal Comments from the Public Hearing				
Public Speaker 1	7	Earlier you mentioned that the maintenance is being shifted from forest services to the town of Mammoth. Where is that process now and who's that -- does that wait until the new road's built or has the town started? Where is that? IS that a question for the town guys or for you?	WENDY LONGLEY: Well, I can answer it. I mean, I don't know, that's kind of between the town and the USFS before the project gets constructed. I assume that it's going to be maintained as it is right now. As part of the project, we will be executing the highway easement, that will give the town the authority to do the maintenance on the Forest Service property. So, certainly, by the time we're completed, that transition will have occurred. I would assume, and I don't know, but I would assume the Forest Service is gonna be teaming up until the maintenance on the project comes to a close. I'll get her in the back, and then I'll get you.	NO

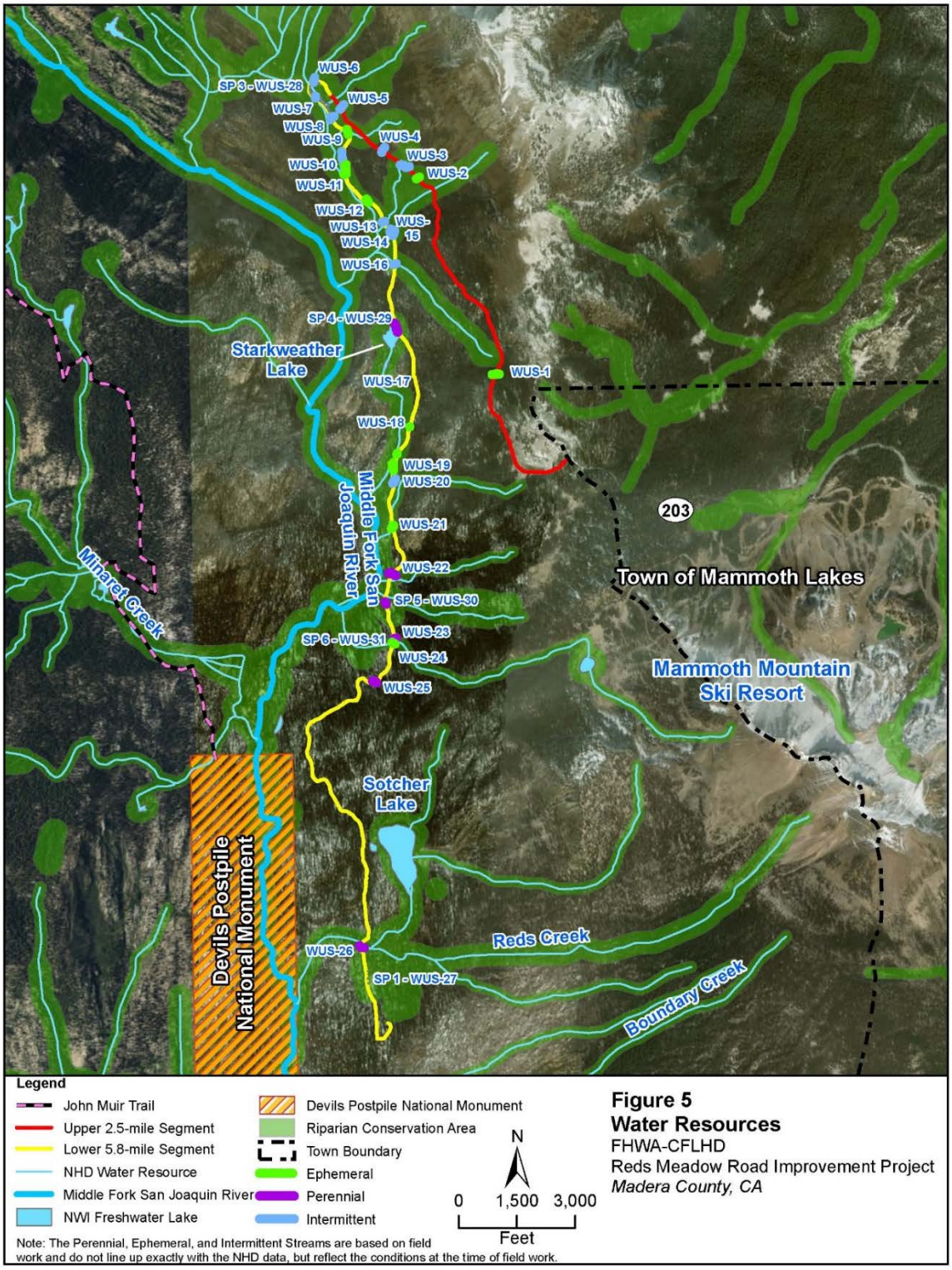
Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
Public Speaker 2	8	PUBLIC SPEAKER 2: I was wondering where the seven dollar fee currently goes, if it goes to the park service or it's split between the park service and forest service, and the one dollar that goes to town, if they're posing to take to offset their maintenance costs?	WENDY LONGLEY: I'm gonna refer that to, who wants to answer? Forest Service? Town? SPEAKER FOR FOREST SERVICE: I guess it depends on the fee. The vehicle fee is collected by the forest service, the fee collected for the shuttle service goes to ESTA, and we get a small percentage of that, the Forest Service does. PUBLIC SPEAKER 2: The vehicle fee goes to the park service? SPEAKER FOR FOREST SERVICE: Yes, one hundred percent of it does. PUBLIC SPEAKER 2: Goes to the Park service? SPEAKER FOR FOREST SERVICE: Forest Service. PUBLIC SPEAKER 2: But not to the park service? SPEAKER FOR FOREST SERVICE: Correct.	NO
Public Speaker 3/Public Speaker 2	9	PUBLIC SPEAKER 3: Isn't there a one dollar surcharge or something? PUBLIC SPEAKER 2: Yeah, that's what I was curious about. I saw something in one of the documents where a dollar of it goes to the town of Mammoth Lakes.	SPEAKER FOR FOREST SERVICE: So we don't – forest services don't plan to change our fee schedule for access through the valley.	NO
Public Speaker 3/Public Speaker 4/ Public Speaker 5	10	PUBLIC SPEAKER 3: Right. So there's two things we're talking about here. We're talking about vehicle access, and then they're proposing a one dollar surcharge to the shuttle service for adult fares. That one dollar will go into the trust of the town for the future maintenance of the road. It's anticipated that the surcharge will start by next year, so by the beginning of construction – PUBLIC SPEAKER 4: I asked what the rationale was for choosing where the dollar surcharge would be allocated from, and he said that they chose the shuttle system because there's more dollars generated from the shuttle tickets than from vehicle tickets. PUBLIC SPEAKER 5: This one, I think I need to compliment you guys on the fairness of this presentation, and as a frequent user of the Rock Creek Road, scenic route road, and the road up to Convict Lake, I'm very impressed with how that improvement has been handled. In other words, the improvements on the highway, it doesn't look outwardly any different than the way it looked before. It's discrete, it blends in, and it's a very nice surface, and I think that the view and visual impact of the road going down to Agnew in particular, is very, very important. When you're hiking back to Minaret Lake, you don't want to look back at Mammoth Mountain and that slope and see an ugly highway on the hillside. And I think that those views are very important, and I just support this project because I think that 75 thousand people a year going down there right now, if those numbers are close, 50,000 people going on the bus. I think that there's people traveling by public transport to access the back country, even if it's just a short walk to Rainbow Falls or to the Postpile. To be frank, I think a lot about our southern California guests are currently probably terrified to drive on that road, and even when it's improved, I think that that road would be way outside of their experience, literally, anywhere. So they'd be a lot more relaxed using public transport and closing their eyes. So I support the project. The engineering, I'm sure, is going to be a challenge, there's a lot of water and that steep slope. That is a project that will allow access to many, many people to go to back country with minimal damage to the environment itself. My other hobby besides backpacking is cycling, and it's a wonderful road to cycle. You go down almost as slowly as you go up it these days with the pavement. It's a wonderful asset, simply a bike ride, that is so unique in this. So congratulations on a great presentation. Thank you.	WENDY LONGLEY: Thank you.	NO

Commenter	Comment #	Public Comment Received	FHWA Response	Change Made to Final EA Documented in Errata (YES/NO)?
Written Comments from the Public During Comment Period				
Public Speaker 6	11	PUBLIC SPEAKER 6: As I understand, the town of Mammoth Lakes would not take over the maintenance of the road, if it were to be a one and a half or one with pullouts, it has to be two lane for the town to take on maintenances there? Can you kind of explain more of the rationale behind that?	WENDY LONGLEY: I don't want to speak for the town on that. I think there were some discussions on consideration of safety and risk, if they're gonna be taking on maintenance, and, certainly, a two-lane roadway minimizes those safety concerns. It is our preferred alternative in the environmental document right now, and it is what was put into the access program application. I don't know if you want to add anything to that? UNIDENTIFIED SPEAKER: Sure. We agreed -- can you hear me? We agreed with the preferred alternative and that was what the town applied for in the FLAP application. We had a number of discussions about that alternative and what would be best for the long term of the project, and the town felt it would be best to have the full billed out, the best project possible, if we could take over full maintenance of the road.	NO
Public Speaker 6	12	PUBLIC SPEAKER 6: So as you relandscape the slopes or you're changing the grade, you'll have, or, initially, you'll have some bare spots. How do you -- who would -- would it be part of this project to rehabilitate those bare areas, or is that just waiting until the natural seeds just fill in?	WENDY LONGLEY: No, that's a good question. We absolutely do come in and reseed, sometimes that involves plantings, but we will reseed any disturbed areas, and we're, through the permitting process, required to do that, as well. We will not be able to get out of the state storm runner permits until vegetation has taken up over the seventy percent of the disturbed slopes. So, it is absolutely something that we do include in the project, and I think you can go out, if you've driven Rock Creek, you can see what it looks like a year, two, three years out. Because you're right, as soon as we leave, the day we leave, you can tell that it was just reseeded, it's been sprayed with the mulch, so you can see it, but it does take hold pretty quickly.	NO
Public Speaker 6	13	PUBLIC SPEAKER 6: So where would you get your seeding? Would it be plants that are just generally Eastern Sierra plants, or would you be more specific to what's on that slope and the hillside now?	WENDY LONGLEY: So, at this early phase, we don't have that level of detail mapped out, but it's something that we work in close coordination with the Forest Service, their botanist, to identify what's native, what's gonna take at this elevation, it might not be the same seed mix at the top as it is at the bottom, although at the bottom we're not gonna have as much disturbance area. But that's something that we defer to the local expertise, to the Forest Service.	NO
Public Speaker 7	14	PUBLIC SPEAKER 7: I'd like to add a comment to consider the alignment of the lower portion of the road for public safety. I think there have been some previous comments made by the resort owners of Reds Meadow and their safety concerns of the current alignment of the lower portion of this road, and I would support looking at that, a realignment of that for public safety.	The alternative screening process for the project considered the realignment of substandard horizontal alignments. New alignments were considered against environmental consequences. Once realignment in the lower segment is still under consideration, as a design option. The realignment would occur near the entrance to the Devil's Postpile National Monument. Figure 4, in the EA shows the location of the roadway and other improvements included in the proposed design option. Implementation of the design option will be decided during a subsequent design phase.	NO

Appendix C

Errata Table Attachments

Attachment 1. Revised EA/IS Figure 5, Water Resources.



Attachment 2. Revised EA/IS Table 3-2, Summary of Potential Impacts to Waters of the United States.

Table 3-2, Summary of Potential Impacts to Waters of the United States

Water Feature ID	Description of Water Feature	Acreage within Project Area	Permanent/Temporary Impacts (acres)
WUS-1	Unnamed ephemeral creek that flows under road through a culvert	0.004	0.0004/0.0012
WUS-2	Unnamed ephemeral creek that flows under road through a culvert	0.011	0.0014/0.0002
WUS-3	Unnamed intermittent creek that flows under road through a culvert	0.014	0.076/0.003
WUS-4	Unnamed intermittent creek that flows along the northern side of road	0.005	0.0036/0
WUS-5	Unnamed intermittent creek that flows under road through a culvert	0.006	0.010/0
WUS-6	Unnamed intermittent creek that flows under road through a culvert	0.004	0.004/0
WUS-7	Unnamed intermittent creek that flows under road through a culvert	0.004	0.004/0
WUS-8	Unnamed intermittent creek that flows under road through a culvert	0.005	0.005/0
WUS-9	Unnamed ephemeral creek that flows under road through a culvert	0.012	0.001/0
WUS-10	Unnamed intermittent creek that flows along the eastern side of the road	0.073	-
WUS-11	Unnamed ephemeral creek that flows under road through a culvert	0.025	0.002/0
WUS-12	Unnamed ephemeral creek that flows under road through a culvert	0.004	0.002/0
WUS-13	Unnamed intermittent creek that flows under road through a culvert	0.003	0.003/0
WUS-14	Unnamed intermittent creek that flows under road through a culvert	0.002	0.002/0
WUS-15	Unnamed ephemeral creek that flows under road through a culvert	0.003	0.003/0
WUS-16	Unnamed intermittent creek that flows under road through a culvert	0.003	0.003/0
WUS-17	Unnamed ephemeral creek that flows under road through a culvert	0.003	0.003/0
WUS-18	Unnamed ephemeral creek that flows under road through a culvert	0.003	0.003/0
WUS-19	Unnamed ephemeral creek that flows under road through a culvert	0.041	0.002/0
WUS-20	Unnamed intermittent creek that flows under road through a culvert	0.016	0.010/0

Table 3-2, Summary of Potential Impacts to Waters of the United States

Water Feature ID	Description of Water Feature	Acreage within Project Area	Permanent/Temporary Impacts (acres)
WUS-21	Unnamed ephemeral creek that flows under road through a culvert	0.004	0.003/0
WUS-22	Summers Creek, a perennial creek that flows under road through a culvert	0.022	-
WUS-23	Unnamed intermittent creek that flows under road through a culvert	0.004	0.004/0
WUS-24	Unnamed ephemeral creek that flows under road through a culvert	0.002	0.002/0
WUS-25	Unnamed ephemeral creek that flows under road through a culvert	0.005	0.005/0
WUS-26	Reds Creek, a perennial creek that flows under road through a culvert	0.019	0.009/0
WUS-27	Wetland, Wet Meadow	0.011	-
WUS-28	Wetland	0.963	-
WUS-29	Wetland, Starkweather Lake Shoreline	0.026	-
WUS-30	Wetland, Wet Meadow	0.002	-
WUS-31	Wetland	0.031	-
	Project Totals	1.33	0.1614/0.0044

Attachment 3. Revised EA/IS Table 3-4, Special-Status Species with Potential to Occur in the Biological Survey Area.

Table 3-4. Special-Status Species with Potential to Occur in the Biological Survey Area

Common Name	Scientific Name	Regulatory Status[a]	General Habitat Description[b]	Potential to Occur	Determination[c]
Plants					
Pinzl's rockcress	*Boechera pinzliae*	USFS-S	Steep, unstable scree and sand in subalpine coniferous forests and alpine boulder and rock fields 10,600 – 10,715 feet.	**None**: No suitable habitat in the project Area. Project area outside the known elevation range for the species.	**NE**
Tulare rockcress	*Boechera tularensis*	USFS-S	Rocky slopes in upper montane and subalpine coniferous forests. 5,980 – 11,000 feet.	**Moderate**: Suitable habitat within BSA.	**MANL**
Bolander's bruchia	*Bruchia bolanderi*	USFS-S	Damp clay soils along streambanks, meadows, fens, and springs in lower and upper montane coniferous forests. 5,280 – 11,000 feet.	**Low:** Suitable moist habitat for this species is available, but clay soil was not found to be prevalent within BSA.	**MANL**
Liddon's sedge	*Carex tiogana*	USFS-S	Meadows and seeps in broad-leafed upland forests, lower montane coniferous forests, and pinyon and juniper woodlands. 2,740 – 9,950 feet.	**Moderate:** Suitable montane and moist habitat for this species within BSA.	**MANL**
Short-leaved hulsea	*Hulsea brevifolia*	USFS-S	Forest openings, road cuts, or areas with granitic or volcanic soils in lower and upper montane coniferous forests. 4,900 – 10,500 feet.	**Moderate:** Suitable habitat in small disparate patches within BSA.	**MANL**
Mono Lake lupine	*Lupinus duranii*	USFS-S	Pumice sand flats and areas with coarse barren soils of volcanic origin in Great Basin scrub, subalpine coniferous forests, and upper montane coniferous forests. 2,500 – 10,000 feet.	**Low:** Suitable habitat in very few small disparate patches within BSA.	**MANL**

Table 3-4. Special-Status Species with Potential to Occur in the Biological Survey Area

Common Name	Scientific Name	Regulatory Status[a]	General Habitat Description[b]	Potential to Occur	Determination[c]
Broad-nerved hump-moss	*Meesia uliginosa*	USFS-S	Bogs, fens, meadows, and seeps, and on moist, often carbonate, soils and along streams in upper montane coniferous forests. 5,700 – 10,000 feet.	**Low:** Suitable moist habitat present in few small disparate patches in BSA.	**MANL**
Fish					
Paiute cutthroat trout	*Oncorhynchus clarkii seleniris*	FT	Cool, well-oxygenated waters. Cannot tolerate presence of other salmonids and requires clean gravel for spawning.	**Low**. Although species could occur within creeks in BSA, these creeks would provide potential low-quality habitat due to presence of other salmonids observed during survey. Nearest CNDDB occurrence of species was in 1990 approximately 4 miles southwest of BSA. With project mitigation measures incorporated, no impact to species is anticipated.	**NA**
Amphibians					
Yosemite toad	*Bufo canarus*	FT	Wet meadows in the Sierra Nevada from Alpine County south to Fresno County. 4,000 – 12,000 feet.	**Low**. Marginally suitable low-quality habitat is present on the project site. Most recent occurrence of the toad within the vicinity of the project area was July 24, 2013, approximately 2 miles north of project, where the species was found in a wet meadow near a spring/stream. Unlikely to occur within project area.	**NLAA**
Sierra Nevada yellow-legged frog	*Rana sierrae*	FE	Upper-elevation lakes, ponds, bogs, and slow-moving alpine streams. 6,000 – 12,000 feet.	**None**. Creeks provide potentially suitable habitat. However, aquatic habitat on the project site is of low habitat value for the species because of hydrologic conditions, presence of predators (e.g., bullfrogs, nonnative trout), and disturbed aquatic habitat. Also, species unlikely to be present based on lack of recent occurrences in the area (Richard Perloff, USFS).	**NE**
Birds					
Bald eagle	*Haliaeetus leucocephalus*	USFS-S	In association with large bodies of water or free-flowing rivers with abundant fish. Nests in adjacent snags.	**Moderate:** Known to nest and forage in the surrounding areas. However, with project	**MANL**

Table 3-4. Special-Status Species with Potential to Occur in the Biological Survey Area

Common Name	Scientific Name	Regulatory Status[a]	General Habitat Description[b]	Potential to Occur	Determination[c]
				mitigation measures incorporated, no impact to species is anticipated.	
California spotted owl	*Strix occidentalis*	USFS-S; BCC; CDFW-SSC	Sierran mixed conifer, red fir, ponderosa pine/hardwood, eastside pine, and foothill riparian/ hardwood habitats with canopy cover typically greater than 70 percent. Large snags and an accumulation of downed woody debris are usually present.	**Low**: Although this species is known to occur in the area, habitat in the project area lacks sufficient canopy cover to support nesting. With project mitigation measures incorporated, no impact to species is anticipated.	**NE**
Great gray owl	*Strix nebulosa*	USFS-S	Old-growth red fir, mixed conifer, or lodgepole pine habitats near wet meadows.	**Unlikely**: No suitable habitat in the project area.	**NE**
Northern goshawk	*Accipiter gentiles*	USFS-S; CDFW-SSC	Older-age mixed coniferous forests and deciduous woodlands dominated by red fir, Jeffrey pine, and ponderosa pine. Nests in closed canopy areas with larger trees, deciduous riparian habitat adjacent to conifer stands, and occasionally in pure stands or stands dominated by mature lodgepole pine.	**Moderate:** Although this species is known to occur in the area, they are not known to nest adjacent to the road in the Biological Survey Area.	**MANL**
Prairie falcon	*Falco mexicanus*	BCC	Dry, open terrain, either level or hilly. Breeding sites located on cliffs.	**Low**: Terrain within BSA is not highly suitable: it is not open, but rather mostly dense forest. With project mitigation measures incorporated, no impact to species is anticipated.	**MANL**
Mammals					
California wolverine	*Gulo luteus*	USFS-S; CDFW-FP	Areas of low human disturbance in mixed conifer, red fir, and lodgepole forest, and occasionally subalpine conifer, alpine dwarf shrub, wet meadow, and montane riparian habitats. Shelters in caves, hollows in cliffs, logs, rock outcrops, and burrows, generally in denser forest stages.	**Unlikely**: Documented in 2007 approximately 4 miles northwest of BSA. Human activity in proximity to the project area likely precludes this species' presence.	**NE**

Table 3-4. Special-Status Species with Potential to Occur in the Biological Survey Area

Common Name	Scientific Name	Regulatory Status[a]	General Habitat Description[b]	Potential to Occur	Determination[c]
Fisher - West Coast DPS	*Pekania pennanti*	ST; USFS-S	Large areas of intermediate to large tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs, and rocky areas for cover and denning.	**Low**: Suitable habitat within BSA. Documented in 1970s approximately 2 miles east of BSA. With project mitigation measures incorporated, no impact to species is anticipated.	**MANL**
Sierra marten	*Martes caurina sierrae*	USFS-S	Areas lacking numerous and/or heavily traveled roads in dense, multi-storied, multi-species late seral coniferous forests of red fir, mixed red fir/white fir, lodgepole, and Sierran mixed conifer with canopy cover of 60 to 100 percent.	**Moderate**: Known to occur in surrounding area, and may forage near the project area, though habitat there lacks the canopy density this species typically prefers. High level of human activity in the project area also likely precludes significant use by this species. With project mitigation measures incorporated, no impact to species is anticipated.	**MANL**
Townsend's big-eared bat	*Corynorhinus townsendii*	USFS-S CDFW-SSC	Deserts, native prairies, coniferous and mixed forests, riparian communities, active agricultural areas, and coastal areas.	**Low.** CNDDB has no occurrences of the species within 5 miles of the Project area. Optimal habitat is not present adjacent to the road. With project mitigation measures incorporated, no impact to species is anticipated.	**NE**
Pallid bat	*Antrozous pallidus*	USFS-S CDFW-SSC	Low desert, oak woodland and coastal redwood, coniferous forest, deciduous woodlands, brushy terrain, rocky canyons, and open farmland.	**Low**. CNDDB has no occurrences of the species within 5-miles of the project area. However, there are unconfirmed records of it occurring within DEPO. Habitat adjacent to the road would not be optimal. With project mitigation measures incorporated, no impact to species is anticipated.	**NE**
Western red bat	*Lasiurus blossevillii*	CDFW-SSC	Forests and woodlands from seal level to elevations containing mixed conifer forests on edge habitat adjacent to streams, fields, or urban areas.	**Low**. CNDDB has no occurrences of the species within 5 miles of the project area. However, there are unconfirmed records of it occurring within DEPO. Optimal habitat is not present adjacent to the road. With project mitigation measures incorporated, no impact to species is anticipated.	**NE**
Yuma myotis	*Myotis thysanodes*	USFS-S	Associated with a variety of habitats; optimal habitat includes pinyon-juniper, valley foothill hardwood, and hardwood-	**Low**. Species has been detected in the area; however, no known occurrences on or near the project site, and optimal habitat is not present	**NE**

Attachment 4. Revised EA/IS Appendix H – Environmental Commitments Matrix

List of Environmental Commitments

The following list describes measures that will be implemented as part of the project to avoid, minimize, or otherwise mitigate economic and environmental impacts associated with the project. Mitigation measures and compliance with federal laws and regulations with regards to applicable resource categories will be specified in the contract documents. The following list of mitigation measures and commitments is not subject to change or modification without prior written approval of the Federal Highway Administration – Central Federal Lands Highway Division.

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
FHWA-CFLHD	3.2	Water Quality and Resources	The following measures will be incorporated into the project to address potential water quality and resource impacts: The project will incorporate drainage improvements (e.g., riprap, slope paving, turf reinforcement mat, and various types of energy dissipaters) to manage and maintain stormwater runoff without concentrating flows and creating turbulent conditions downstream **Erosion and Sediment Control Plan.** FHWA-CFLHD will prepare and implement an erosion control and restoration plan to control short- and long-term erosion and sedimentation effects, and to restore soils and vegetation in areas affected by construction activities. The Erosion and Sediment Control Plan will include all necessary requirements regarding erosion control and will implement best management practices (BMPs) for erosion and sediment control, as required. Only appropriate native plant material and seed mixes, as applicable, will be used for erosion control and restoration. Erosion control measures will be employed and placed on all disturbed slopes and material storage and disposal sites, as directed by FHWA-CFLHD. **Implementation of BMPs.** A Stormwater Pollution Prevention Plan (SWPPP) will be developed in concert with the above-described control plans and erosion control BMPs will be implemented to minimize wind- or water-related erosion. In addition, FHWA-CFLHD will develop and implement an SWPPP, as required by the conditions of a National Pollutant Discharge Elimination System (NPDES) permit. FHWA-CFLHD will prepare an SWPPP that identifies BMPs for discharges and for groundwater disposal from dewatering operations associated with road construction. The SWPPP will identify how and where these discharges will be disposed of during construction and operations. The SWPPP will include provisions for the following: • The area of ground disturbance will be minimized. No ground disturbance will be allowed outside the limits defined in permits. Preservation of existing vegetation will be provided to the maximum extent possible. • Temporary erosion control devices will be an integral part of construction. Sedimentation fences will be used to contain polluted or turbid runoff from the work site. Other methods of temporary erosion control, such as hay bale check dams, will be employed to protect areas susceptible to damage from runoff. Erosion control devices will be installed concurrently with construction earthwork. • Sediment control will be maintained at construction site entrances and exits. • Spill control BMPs will be implemented any time chemicals or hazardous substances are stored or used on the project site. Contractors will be educated in proper material handling, spill prevention, and cleanup. Cleanup materials will be onsite and located near material storage and use areas. • Erosion control devices will be monitored on a regular basis and augmented as necessary. In the event of pending storms, and in compliance with the SWPPP, erosion control devices will be inspected to ensure that such devices are in place and are functional. Monitoring and maintenance of erosion control devices and adjacent disturbed areas will continue during and immediately after storm events.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
			• All equipment will be maintained to prevent the leakage of vehicle fluids, such as gasoline, oils, or solvents, and developing a Spill Response Plan. Where possible, hazardous materials such as fuels, oils, solvents, etc. will be stored in sealable containers in a designated location that is at least 50 feet from wetlands and aquatic habitats. FHWA-CFLHD will submit a notice of intent to discharge stormwater to the Regional Water Quality Control Board (RWQCB) before construction or operation activities begin. Servicing vehicles and construction equipment, (including fueling, cleaning, and maintenance vehicles and equipment) will be kept at least 50 feet from any aquatic habitat unless separated by a topographic or drainage barrier. Additionally, it is anticipated the project will seek a Nationwide 14 Permit, which is specific to linear transportation projects, that may require additional stipulations. Implementation of the following measures would avoid or minimize adverse effects and the corresponding impacts to water resources. Avoidance and minimization efforts will be detailed in full within the permit applications and include, but are not limited to the following: • The roadway widening and alignment is being designed to follow the existing alignment as much as practicable. • The slope modifications will be designed to reduce and/or avoid impacts to jurisdictional features. • The proposed widening alignment will be shifted in allowable areas to reduce and/or avoid impacts to jurisdictional features. • Reinforced soil slopes and/or walls will be utilized in practicable areas along the roadway to reduce the footprint and avoid impacts to jurisdictional features. The locations of jurisdictional features were assessed and delineated (Appendix E) as described previously. Throughout the planning process, avoidance and minimization efforts will be applied to avoid and minimize impacts, whenever practical, as described below. However, the terrain in the project area does not allow for total avoidance of jurisdictional features. Therefore, the following will be required: • A Section 404 National Permit (No. 14 – Linear Transportation Projects) application and a Section 401 Water Quality Certification application, under the Clean Water Act (CWA), will be submitted to the U.S. Army Corps of Engineers (USACE) and the RWQCB, respectively, requesting permit approval for the anticipated impacts to jurisdictional features. • FHWA-CFLHD will compensate for the permanent loss of jurisdictional features through onsite and offsite mitigation with a minimum 1:1 ratio, or as agreed upon through the permit terms and conditions. A Mitigation and Monitoring Plan will be developed and submitted with the permit applications to the USACE and RWQCB to document measures to ensure successful mitigation and implementation. FHWA-CFLHD will be responsible for ensuring all permit terms and conditions are met. • FHWA-CFLHD will restore temporary loss of jurisdictional features to existing grade, hydrology (to existing conditions when applicable), and reseed with an appropriate native seed mix, as required by CWA. The restoration details associated with each impact will be identified in the CWA permit applications.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
FHWA-CFLHD and Contractor	3.3	Biological Resources	**Environmentally Sensitive Area (ESA) Fencing**. Before the start of construction, ESAs defined as areas containing sensitive habitats adjacent to or within construction work areas for which physical disturbance is not allowed—will be clearly delineated using high-visibility orange fencing. The ESA fencing will remain in place throughout the duration of the project and will prevent construction equipment or personnel from entering sensitive habitat areas. The final project plans will depict all locations where ESA fencing will be installed and how it will be installed. The special provisions in the bid solicitation package will clearly describe acceptable fencing and erosion control material (monofilament-free wattles/rolls), and prohibited construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within ESAs. **Erosion and Sediment Control Plan**. FHWA-CFLHD will prepare and implement an erosion control and restoration plan to control short- and long-term erosion and sedimentation effects, and to restore soils and vegetation in areas affected by construction activities. The plan will include all necessary requirements regarding erosion control and will implement BMPs for erosion and sediment control as required. Only appropriate native plant material will be used for erosion control and restoration. Erosion control will be placed on all disturbed slopes and material disposal sites, as directed by the FHWA-CFLHD Erosion Control Branch. **Staging.** Designated contractor staging areas for materials and equipment storage outside of Stream Exclusion Zone areas. Construction fencing and/or silt barriers will protect designated staging and storage areas, as appropriate. Following project completion, all areas used for staging will be restored to meet the objectives of the Permanent BMP Plan and Adaptive Management Restoration Plan. **Implementation of BMPs.** An SWPPP will be developed and erosion control BMPs implemented to minimize wind- or water-related erosion. FHWA-CFLHD will submit to the Central Valley RWQCB a Notice of Intent to Discharge Stormwater before construction or operation activities begin. In addition, FHWA-CFLHD will develop and implement an SWPPP, as required by the conditions of a NPDES permit. FHWA-CFLHD will prepare an SWPPP that identifies BMPs for discharges and for groundwater disposal from dewatering operations associated with road construction. The SWPPP will identify how and where these discharges will be disposed of during construction and operations. The SWPPP will include provisions for the following: • The area of ground disturbance will be minimized. No ground disturbance will be allowed outside the limits defined in permits. Preservation of existing vegetation will be provided to the maximum extent possible. Required BMPs will be in place during construction of the project to minimize effects to Yosemite toad habitat. ESAs will be marked with high-visibility ESA and exclusionary fencing to clearly identify the construction area relative to sensitive areas. • Temporary erosion control devices will be an integral part of construction. Sedimentation fences will be used to contain polluted or turbid runoff from the work site. Other methods of temporary erosion control, such as hay bale check dams, will be employed to protect areas susceptible to damage from runoff. Erosion control devices will be installed concurrently with construction earthwork. • Sediment control will be maintained at construction site entrances and exits.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
			• Spill control BMPs will be implemented any time chemicals or hazardous substances are stored or used on the project. Contractors will be educated in proper material handling, spill prevention, and cleanup. Cleanup materials will be onsite and located near material storage and use areas. • Erosion control devices will be monitored on a regular basis and augmented as necessary. In the event of pending storms, and in compliance with the SWPPP, erosion control devices will be inspected to ensure that such devices are in place and functional. Monitoring and maintenance of erosion control devices and adjacent disturbed areas will continue during and immediately after storm events. • Maintaining all equipment to prevent the leakage of vehicle fluids (such as gasoline, oils, or solvents) and developing a Spill Response Plan. Hazardous materials (such as fuels, oils, and solvents) will be stored in sealable containers in a designated location at least 50 feet from wetlands and aquatic habitats. • Servicing vehicles and construction equipment (including fueling, cleaning, and maintenance) will be stored at least 50 feet from any aquatic habitat unless separated by a topographic or drainage barrier. **Worker Environmental Awareness Training.** Before the onset of construction activities, training will be provided for all construction personnel. At a minimum, training will include a description of Yosemite toad, as well as migratory birds and their habitats; a discussion of the potential occurrence of Yosemite toad; an explanation of the status of Yosemite toad and protection under the ESA; the description of measures to be implemented to conserve Yosemite toad and its habitat as it relates to the work site; and the description of boundaries within which construction may occur. A fact sheet conveying this information will be prepared and distributed to all construction and project personnel entering the project area. Upon completion of the training program, construction personnel will sign a form stating that they attended the program and understand all the avoidance and minimization measures and implications of the ESA. **Dust Control.** If dust control measures are needed, standard dust control BMPs will be used. Material stockpiles will be watered, sprayed with tackifier, or covered to minimize dust production and wind erosion. **General Housekeeping.** To prevent attraction of predators, disposal of garbage, trash, and other solid waste associated with construction operations in contractor-furnished trash bins located in the project site and staging areas. Dispose of waste at least once a week at appropriate dumps outside of the project site subject to state, county, and local regulations. Bear-proof requirements, such as scented food, trash, and debris: • Will be properly contained in Contractor-furnished bear-resistant containers at project site and staging areas and kept closed and locked at all times. • Shall be disposed of at least once a week or immediately and often at the first sign of wildlife scavenging (such as, rodents, birds, coyotes, and bears). • Scented items and ice chest should not be left unattended. • Disposal should occur at appropriate dumps outside of the project site subject to state, county, and local regulations. **Pets**. To prevent harassment, injury, or mortality of a Yosemite toad or destruction of their habitat, no pets will be permitted in the project area.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
			Aquatic Invasive Species Management Practices during Project Construction. Consistent with USFWS Hazard Analysis and Critical Control Point planning guidance, the project proponent will develop and implement a plan that includes appropriate aquatic invasive species management practices during project construction. Recommended practices include the following: • All equipment, including individual equipment such as waders, wading boots, or other items entering the project area or used in or around aquatic areas will be decontaminated. • If applicable, all equipment—including individual equipment such as waders, wading boots, or other items—used in known infested areas within the project area will be decontaminated using the above-mentioned methods before being allowed into other areas of the project area not known to contain aquatic invasive species. **Vegetation Removal**. Any vegetation within the cut and fill line or growing in locations where permanent structures will be placed (e.g., road alignment, shoulder widening, and bridge abutments) will be cleared. Vegetation will be cleared only where necessary and will be cut above soil level except in areas excavated for roadway construction. This will allow plants that reproduce vegetatively to re-sprout after construction. All clearing and grubbing of woody vegetation will occur by hand or by using construction equipment such as backhoes and excavators. If clearing and grubbing occur between February 15 and September 1, a qualified biologist(s) will survey for nesting birds within the area(s) to be disturbed, including a perimeter buffer of 50 feet for passerines and 300 feet for raptors, before clearing activities begin. All nest avoidance requirements of the Migratory Bird Treaty Act and CDFW code will be observed (e.g., establishing appropriate protection buffers around active nests until young have fledged). Sensitive species data that results from project surveys will be reported to the California Natural Diversity Database. All cleared vegetation will be removed from the project footprint to prevent attracting animals to the project site. **Riparian Conservation Areas (RCAs).** Efforts to avoid, minimize, and/or mitigate impacts will be negotiated with the U.S. Forest Service (USFS) during subsequent levels of design. Measures to mitigate impacts to RCAs may include the following: • Limit use of heavy equipment on wet or poorly drained soils to what is necessary. Use ground protection mats when access is necessary to these areas. • Stockpile topsoil in areas proposed for ground disturbance, and then redistribute as a top layer to promote plant growth. • Establish native plant species on disturbed ground. A list of appropriate plant species will be obtained from USFS. • Limit the removal of trees within 100 feet of the ordinary high water mark in order preserve riparian functions to the inner riparian zone. **Restore Temporarily Disturbed Areas**. FHWA-CFLHD will restore temporarily disturbed areas to the maximum extent practicable. Exposed slopes and bare ground will be reseeded with native grasses and shrubs to stabilize and prevent erosion.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
			Invasive Plant Management Practices during Project Construction. In consultation with USFS, the project proponent will implement appropriate invasive plant management practices during project construction. • Applicable Invasive Plant Management Measures will be implemented under the direction of the forest botanist. • To ensure that fill material and seeds imported to the project site are free of invasive plants/noxious weeds, the project will use onsite sources of fill and seeds whenever available. Fill and seed materials that need to be imported to the project site will be certified weed-free. • Vehicles and equipment will arrive at the project area clean and weed-free. All equipment entering the project site from weed-infested areas or areas of unknown weed status will be cleaned of all attached soil or plant parts before being allowed into the project site. Vehicles and equipment will be cleaned using high-pressure water or air at designated weed-cleaning stations after exiting a weed-infested area. Cleaning stations will be designated by the contractor or contract officer and located away from aquatic resources. Equipment will be inspected by a FHWA-CFLHD contract officer for mud or other signs that weed seeds or propagules could be present before use in the project area. If the equipment is not clean, the monitor will deny equipment entry into work areas. • Locally collected native seed sources for revegetation will be used when possible. Plant and seed material will be collected from or near the project area, from within the same watershed, and at a similar elevation when possible and with approval of the appropriate authority (e.g., USFS botanist for collection on USFS land). Persistent nonnatives such as cultivated timothy (*Phleum pratense*), orchard grass (*Dactylis glomerata*), or ryegrass (*Lolium spp.*) will not be used. • After the project is completed, the USFS noxious weed coordinator will be notified. The project area will be maintained by the USFS per its Invasive Species Management Plan. • In addition to the proposed construction avoidance and minimization measures discussed above, FHWA-CFLHD will provide appropriate mitigation pursuant to the ESA.		
Contractor	3.4	Economics, Land Use, and Recreational Resources	**Measures to Minimize Construction-Related Noise Increases:** • Standard construction noise mitigation techniques such as proper equipment exhaust noise dissipation (i.e., muffler) and the utilization of hay bales to muffle noise at the construction site would be implemented. • Additional measures to minimize nighttime construction-related noise will be implemented, including a prohibition on certain types of loud activities at night, and advanced notice of scheduled nighttime construction-related activities. **Measures to Minimize Construction-Related Dust**: • Cover open-bodied trucks when used for transporting materials likely to give rise to airborne dust. • Use water or other dust suppressants to control dust within the construction limits at all hours when the project is open to public traffic.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
			• When the project is not open to public traffic, control dust in areas of the project near inhabited residences or places of business. • Use water or other dust suppressants to control dust on active haul roads, material stockpiles, pits, and staging areas. **Measures to Minimize Construction-Related Lighting**. • Minimization of lighting required for operations and safety, directing light specifically to required areas. • Use hooded light fixtures to prevent light spill into surrounding areas and into the night sky.		
FHWA-CFLHD and Contractor	3.5	Cultural Resources	To avoid adverse effects from construction activities on the identified cultural resources, the following measures to avoid, minimize, and mitigate potential impacts will be conducted: • **Prehistoric Lithic Scatter**: A revision in construction plans to shift the proposed culvert to another location outside of the site boundary will be evaluated. If this is not possible, the site boundary will be defined as an Environmentally Sensitive Area (ESA) and culvert installation will be limited to the existing road disturbance footprint. If a constricted work area is not feasible, development of a testing plan to formally evaluate the significance of the resource during excavation of the project will be conducted. This testing plan will stipulate that upon removal of the paved portion of the road during construction, archeological testing will be conducted to determine the presence or absence of artifacts within this portion of the area of potential effect (APE) that was not accessible during previous investigations. This work will be performed by initially probing every 20 feet within the road prism within the boundaries of the prehistoric lithic scatter site. If these probes test positive, then 1-foot by 1-foot plots will be investigated to determine the horizontal profile of any artifacts. If avoidance of cultural material can be ensured upon completion of this testing, construction work will continue. Should avoidance be infeasible, a data recovery effort will ensure before construction continues. Finally, a subsequent report will be generated and submitted to California State Historic Preservation Officer (SHPO) that summarizes the findings and any potential bearing on eligibility of the overall site. • **Pumice Flat Historic Dump**: Sparsely distributed historic-era debris within the APE is isolated from the primary deposit north of Reds Meadow Road and does not contribute to site eligibility. The proposed culvert replacement/installation and ancillary work will not adversely affect this site. If cultural materials are unearthed during construction, work will be suspended in the area until a qualified archaeologist can assess the significance of the find. Construction will not occur outside of the present survey limits. An additional study will be needed if project limits are extended beyond the present survey limits or new project components are defined adjacent to or within cultural resources site boundaries. There is a potential for discovery of cultural materials during construction; therefore, if any culturally sensitive materials are unearthed during construction, work will halt until a qualified archaeologist can assess the significance of the find. An additional study will be needed if project limits are extended beyond the present survey limits or new project components are defined adjacent to or within archaeological site boundaries.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
FHWA-CFLHD and Contractor	3.6	Section 4(f)	Environmental commitments identified in Section 3.5, Cultural Resources, apply to the Prehistoric Lithic Scatter and Pumice Flat Historic Dump sites under Section 4(f).		
Contractor	3.7	Air Quality	Implementation of the following measures would reduce and control fugitive dust emissions such that they would be less than significant: • Cover open-bodied trucks when used for transporting materials likely to give rise to airborne dust. • Use water or other dust suppressants to control dust within the construction limits at all hours when the project is open to public traffic. • When the project is not open to public traffic, control dust in areas of the project near inhabited residences or places of business. • Use water or other dust suppressants to control dust on active haul roads, material stockpiles, pits, and staging areas. The contractor may be required to obtain permits through Madera County, depending upon the types of construction activities. Activities such as using an asphalt batch plant would most likely require a general conformity permit, consistent with air quality regulations. If permits are required, coordination with Madera County will need to be performed prior to start of construction		
FHWA-CFLHD and Contractor	3.8	Visual Resources	Design measures that are a part of the project and will attenuate its visual effects include: • Regrading disturbed areas and covering with duff to avoid the color contrast created by areas of exposed soil and to encourage natural establishment of vegetation. • Wall facing treatments will be coordinated with USFS to minimize and mitigate visual changes to the landscape. An example of this type of treatment is wire-mesh rock filled retaining walls with color treatments so the rock color is compatible with the surrounding landscape. • A surface treatment will be applied to the crash barriers to reduce reflectivity and give the barriers a color compatible with the surrounding landscape. • Installation of signage consistent with current USFS standards for landscape-sensitive sign design. Design measures to attenuate construction period visual impacts include: • Regrading of disturbed areas as construction activities proceed and covering them with duff to minimize the visual contrast of areas of exposed soil and to encourage natural revegetation. • Limiting the generation of dust through implementation of standard practices for dust suppression. Minimizing the impacts of the lighting needed if nighttime construction takes place. The potential impacts of lighting will be controlled through minimization of lighting required for operations and safety, directing light specifically to required areas and using hooded light fixtures to prevent light spill into surrounding areas and into the night sky.		

Responsible Party	Section	Environmental Resource Category	Environmental Commitment Description	Timing Requirements of Environmental Commitments (Seasonal Restrictions, Month, Year)	Environmental Commitments Completed (Date) and Sign-Off Signatures (Responsible Party)
FHWA-CFLHD and Contractor	3.9	Utilities	The project will coordinate construction activities with utility owners/operators to ensure service is maintained or that proper planning for pausing service has occurred.		
FHWA-CFLHD	3.10	Traffic/Transportation and Pedestrians/Bicycles	Constructability was a major consideration for the feasibility of the Preferred Alternative. Construction work periods are limited by winter weather shutdown (typically by late October or November), the desire to maintain summer access for recreation users, and for emergency response and evacuation. The Preferred Alternative includes temporarily maintaining one lane of traffic by placing temporary concrete barriers along road widening segments with temporary portable traffic signal systems in place to control alternating one-way traffic. Additional traffic control elements will be further evaluated in subsequent design phases. Some intermittent daytime (e.g., 3-hour closures in the morning or evening), nighttime, or full closers for a specific duration (e.g., 1 week) may be necessary; however, a detailed public information plan will be developed in coordination with stakeholders to notify visitors of anticipated delays.		
Contractor	3.11	Emergency Services	Emergency access will be maintained during construction and the contractor will coordinate with local emergency response services to ensure accommodations for emergency access are appropriate and continuous.		
None	3.12	Cumulative Impacts	The Preferred Alternative would not result in significant cumulative impacts; therefore, no additional mitigation measures are proposed. Avoidance, minimization, and/or mitigation measures identified for this project are included under each individual resource evaluation.		

Table 3-4. Special-Status Species with Potential to Occur in the Biological Survey Area

Common Name	Scientific Name	Regulatory Status[a]	General Habitat Description[b]	Potential to Occur	Determination[c]
			conifer woodlands and forests. Uses open habitats, streams, lakes, and ponds as foraging areas. Roosts in caves, mines, buildings, and crevices.	adjacent to the road. With project mitigation measures incorporated, no impact to species is anticipated.	

[a] Regulatory Status:

FE = Federally Endangered

FT = Federally Threatened

ST = State Threatened

BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern

USFS-S = U.S. Forest Service Inyo National Forest Sensitive Species

CDFW-FP = California Department of Fish and Wildlife (CDFW) Fully Protected Species

CDFW-S = CDFW Sensitive Species

CDFW-SSC = CDFW Species of Special Concern

CDFW-WL = CDFW Watch List

[b] Sources

CDFW, 2016

USDA, 2007

USFWS, 2016a

[c] Determination = Determination of the project's effect on a species

Federally Listed Species

NA = Will not affect the species or its designated critical habitat.

NLAA = Not Likely to Adversely Affect the species or its designated critical habitat.

Sensitive Species

NE = No effect

MANL = May affect individuals, but is not likely to result in a trend toward Federal listing or loss of viability.

Attachment 5. Documentation of Materials from September 7, 2018, Public Hearing:

- Sign-in Sheet
- Exhibits
- Presentation Slide Show
- Comment Form
- Transcript

U.S. Department of Transportation Federal Highway Administration

Forest Service USDA

Mammoth Lakes CALIFORNIA

REDS MEADOW ROAD IMPROVEMENTS PROJECT

Draft Environmental Assessment/Initial Study - Public Hearing

September 7, 2017

5:00-7:00 pm

SIGN-IN SHEET

NAME	AFFILIATION	PHONE	EMAIL
JOHN ARMSTRONG	RESIDENT	760.914.0396	JALA@GTE.NET
SARAH REA	THE SHEET	209-605-1860	SARAHJREA@GMAIL.COM
Wendy Schneider	Friends of the	3108493662	wendy@friendsoftheinyo.org
JORA FOGG	" " Inyo	360-259-4275	jora@friendsoftheinyo.org
Sandra Moberly	TOML	760 965 3633	smoberly@townofmammothlakes.ca.gov
Philip Hayes	TOML	760 965 3652	[illegible]@townofmammothlakes.ca.gov
Lynn Boulton	RCRCLG	760 914 9016	chairrcrclg@gmail.com
Malcolm Clark	Sierra Club	7609245639	wmalcolm.clark@gmail.com
Bobby Tanner	Red's Meadow	760-937-0101	bobby@schat.net
Stacy Corless	Mono Co.	7609320190	scorless@mono.ca.gov
Ashley Nottingham	Resident		aanottingham@gmail.com
Michael Baker	Resident	760 9350062	michaelvbaker@gmail.com
Jane Kenyon	resident	934-0372	bcskierjane@gmail

U.S. Department of Transportation
Federal Highway Administration

Mammoth Lakes
CALIFORNIA

REDS MEADOW ROAD IMPROVEMENTS PROJECT

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September 7, 2017

5:00-7:00 pm

SIGN-IN SHEET

NAME	AFFILIATION	PHONE	EMAIL
Dan Holler	TOML	760-965-3601	dholler@townofmammothlakes.ca.gov

Welcome

to the
Reds Meadow Road
Improvements Project
Public Hearing

Welcome

to the

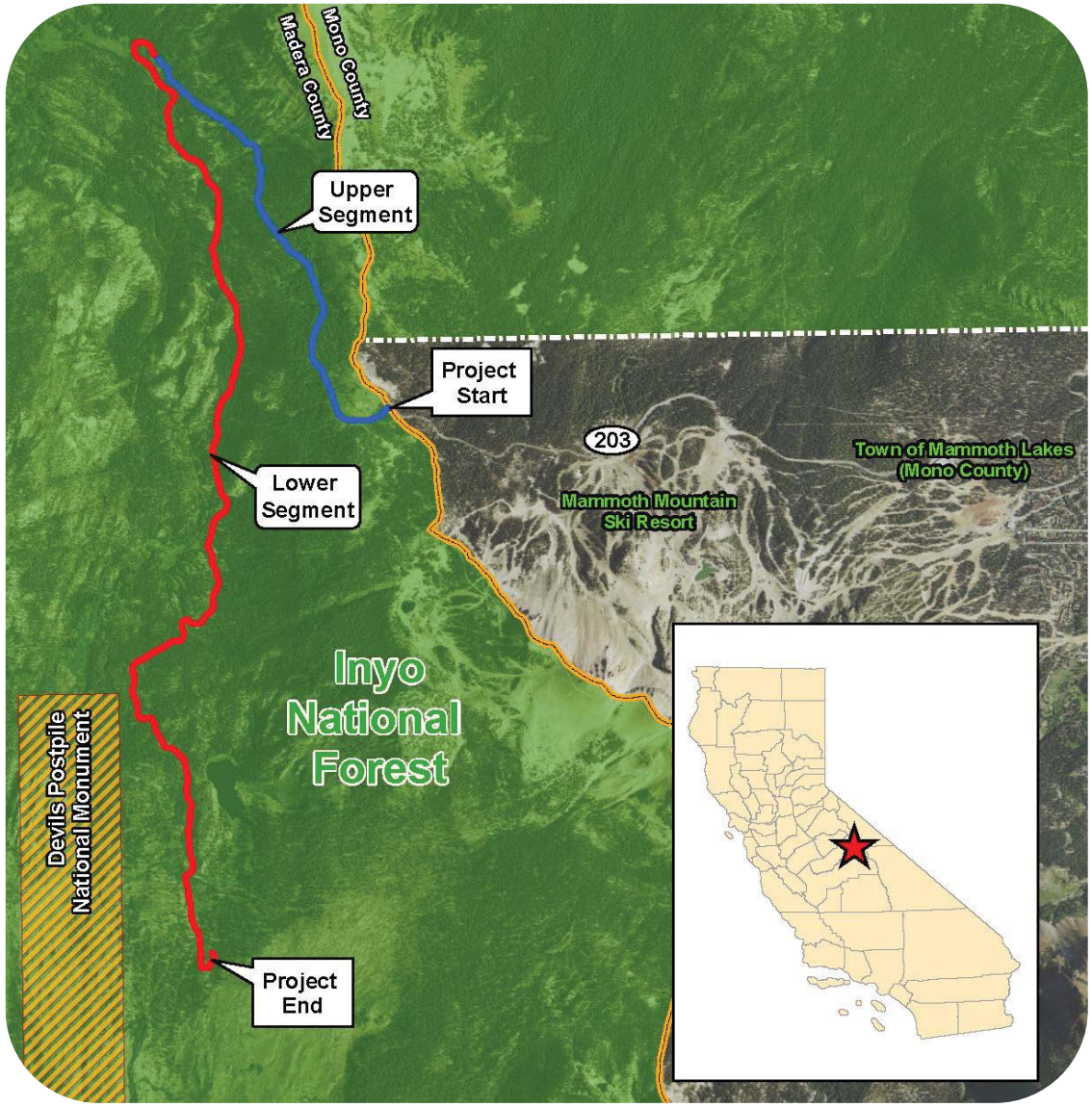
Reds Meadow Road Improvements

Project Public Hearing

Thursday, September 7, 2017

5:00pm-7:00pm

Project Location



Purpose and Need

Purpose

- Improve the deteriorated roadway condition
  - Ensures access to recreational resources
- Improve roadway user mobility/safety
  - Facilitates emergency response into/out of valley
  - Reduces likelihood of multi-modal traffic incidents

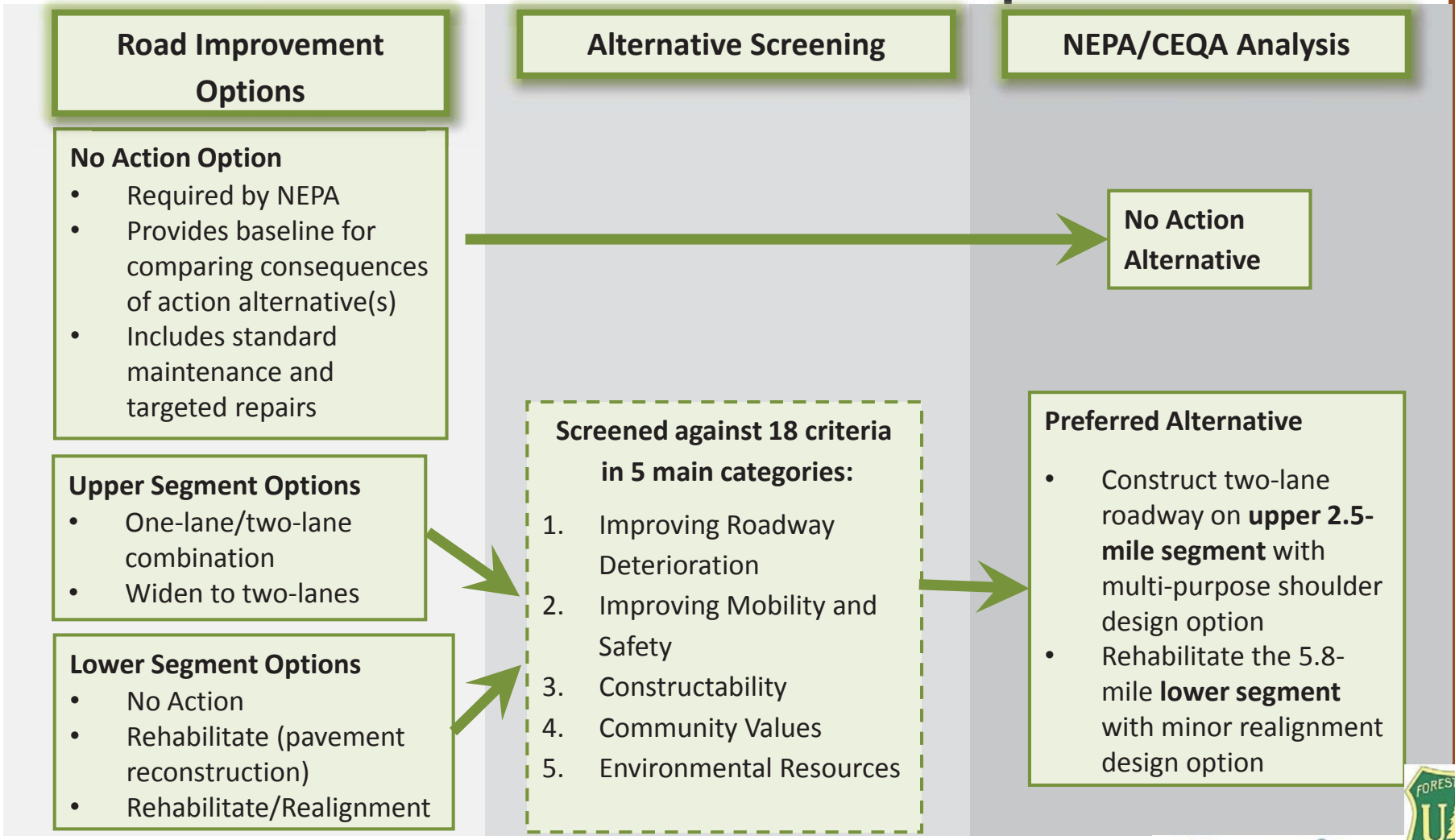
Need

- Deteriorated roadway conditions
  - Longitudinal cracks and edge deterioration of roadway
  - Structural integrity of slope fills
  - Localized saturation of base layers
- Access, mobility, and safety
  - One-lane traffic along upper 2.5-mile segment
- Emergency response
  - Inhibits quick emergency service access into/out of the valley

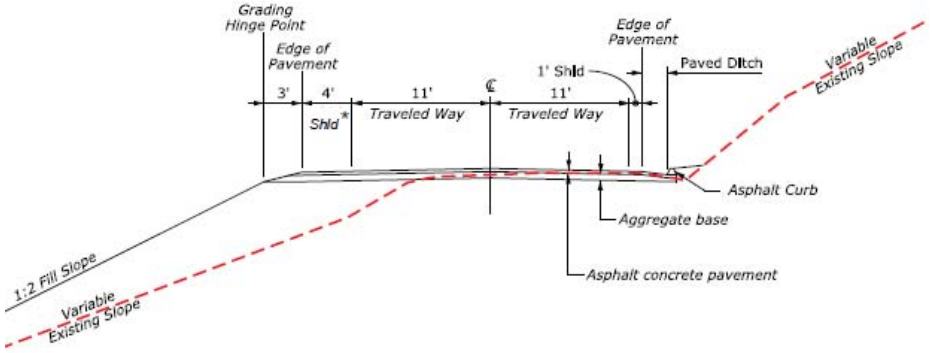
Additional Factors

- Without improvements, the roadway will continue to deteriorate and impede vehicular access and mobility
- Maintenance activities provide only temporary roadway repairs and cannot address ongoing structural and drainage concerns
- Temporary road repairs will eventually be insufficient to maintain the roadway's integrity

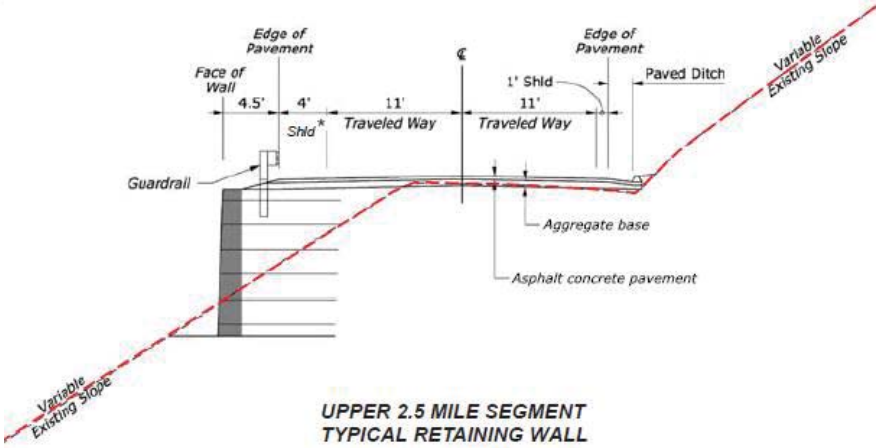
Alternatives Development



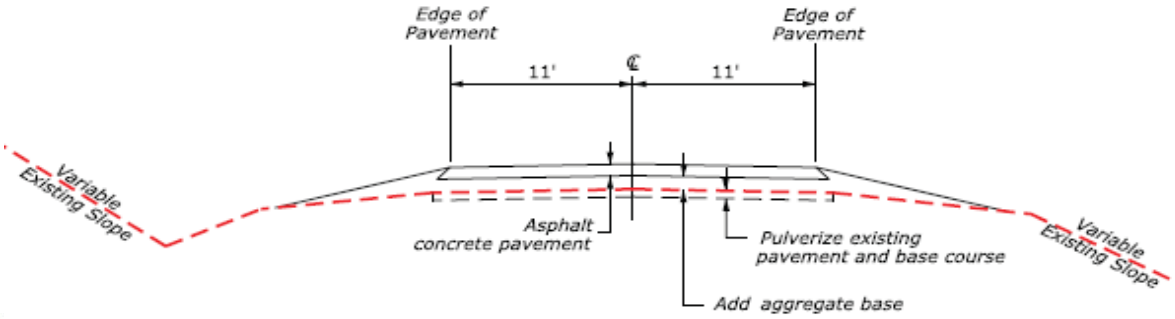
Preferred Alternative



UPPER 2.5 MILE SEGMENT
TYPICAL FILL SLOPE



UPPER 2.5 MILE SEGMENT
TYPICAL RETAINING WALL



LOWER 5.8 MILE SEGMENT
TYPICAL SECTION

Design Summary

What We've Accomplished

- Conceptual Design:
  - Design Tech Memo
  - Plans
  - Construction Estimates
- Topographic survey
- Geotechnical survey
- 15% Design:
  - Design Tech Memo
  - Plans
  - Construction Estimates

Preliminary Construction Cost Estimates:

Alternative	15% Design Estimate		
	Upper 2.5 Miles	Lower 5.8 Miles	Project Total
1: Rehabilitation (pavement reconstruction) entire 8.3 mile length	$2.7M	$6.3M	$9.0M
2: Combination one/two-lane upper 2.5 miles and rehabilitation lower 5.8 miles	$9.2M	$6.3M	$15.5M
3: Widen to two-lanes upper 2.5 miles and rehabilitation lower 5.8 miles	$17.2M	$6.3M	$23.5M
4: Combination one/two-lane upper 2.5 miles and rehabilitation lower 5.8 miles with select road realignments	$9.2M	$6.8M	$16.0M

Notes: M = million U.S. dollars

Project was preliminarily shortlisted in FLAP program

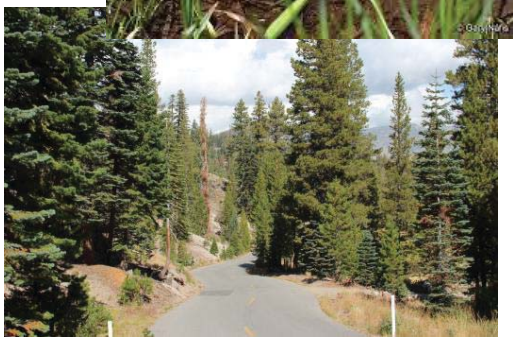
NEPA/CEQA Summary

What We've Accomplished

- Stakeholder meeting (February 2016)
- Public information meeting (March 2017)
- Planning and Environmental Linkages Study (PEL)
- Cultural/historic/archaeological field survey
- Aquatic resources field survey
- Threatened and endangered species field survey
- Consultation with resource agencies and tribes
- Completed Draft Environmental Assessment, Initial Study, and CEQA checklist
    - Evaluated potential impacts to environmental resources
    - Focus on minimization/avoidance of impacts
    - Engaged stakeholders/resource agencies/public
    - Prepared Draft NEPA/CEQA document, including avoidance, minimization and mitigation measures
    - Established foundation for regulatory permitting

Environmental Analysis Results

- Wetlands and Waters of the U.S.
  - No wetlands identified
  - Waters of the U.S at existing culvert crossings
  - Limited impacts within Riparian Conservation Areas
- Biological Resources
  - No listed plants to be impacted
  - Low potential to for Sierra Nevada yellow-legged frog and Yosemite toad to occur
- Cultural Resources/Section 4(f)
  - Two sites/features evaluated
  - No adverse effects to historic properties
  - Section 4(f) finding of *de minimis* impacts



Environmental Analysis Results

- Visual Quality: Low to moderate levels of visual change


Existing Conditions


Existing Conditions


Existing Conditions


Simulation

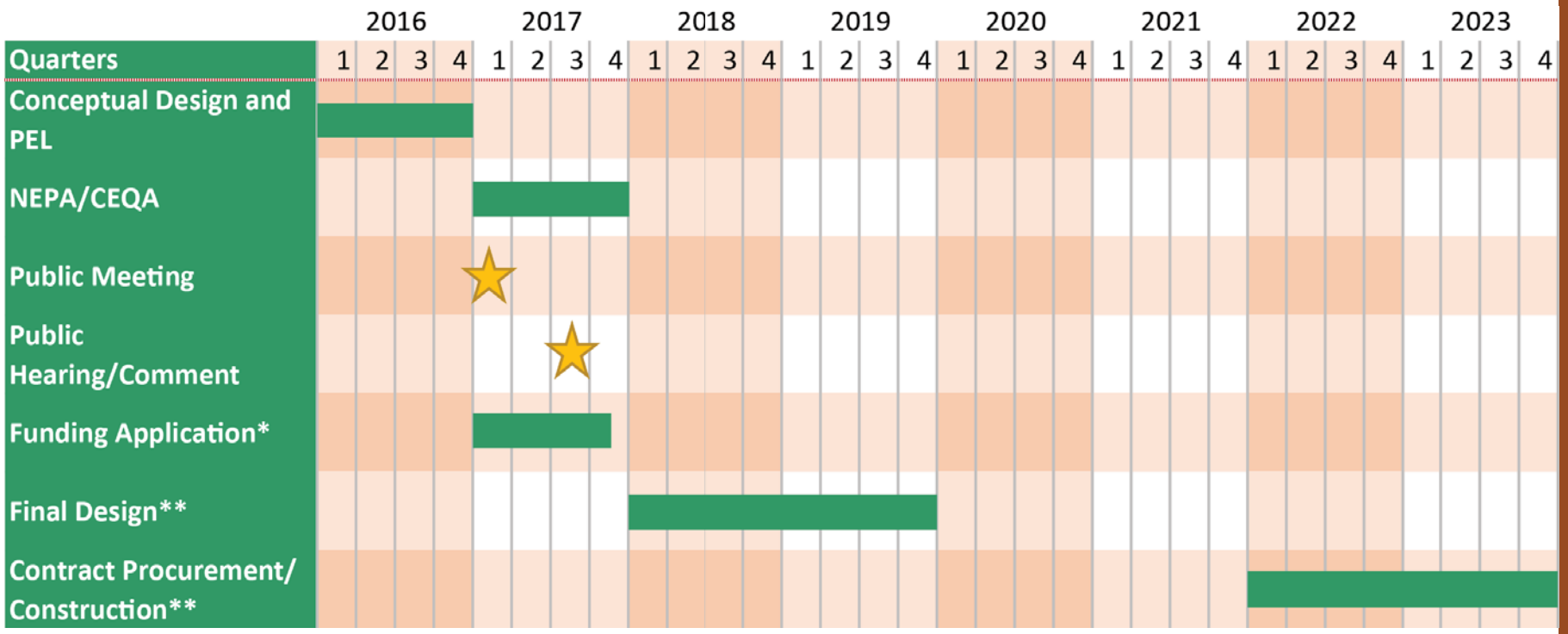

Simulation


Simulation

Environmental Analysis Results

- Economics, Land Use, and Recreational Resources
  - No permanent impacts to shuttle service
  - Access to Reds Meadow Resort and recreational resources will be maintained
  - Intermittent road closures possible during construction
  - Short-term construction-related impacts may potentially occur
- Air Quality
  - No long-term air quality impacts.
  - Measures would be implemented to mitigate dust during construction
- Utilities
  - Waterline, telephone cable, and electric are expected to be remain as-is; however if needed, would be relocated within the roadway prism
- Traffic/Transportation and Pedestrian/Bicycles
  - Long-term improvement to mobility
  - Maintain one-lane of traffic during construction with intermittent road closures
- Emergency Services
  - Long-term improvement to emergency access
  - Maintain emergency access during construction
- Cumulative Impacts
  - No adverse/significant cumulative impacts

Project Timeline



*Final FLAP program decision in 2018

**Dependent upon funding

How to Provide Comments

Comments can be provided in the following three ways:

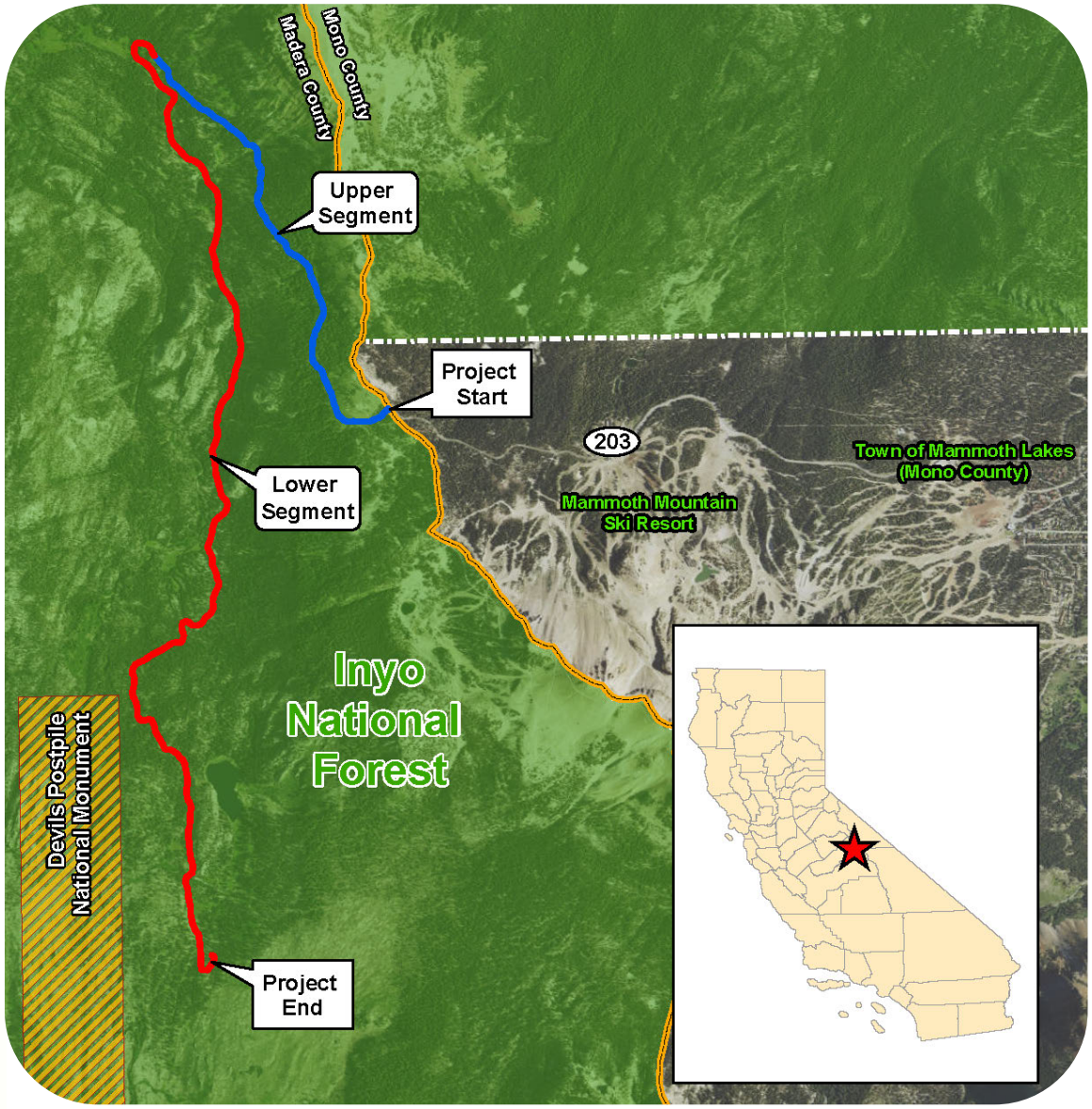
- Talk to the court reporter
- Fill out a comment form and put it in the drop box or submit written comments to:
  - Wendy Longley, FHWA, CFLHD (HFPM-16), 12300 West Dakota Ave., Lakewood, CO 80228
  - Haislip Hayes, Town of Mammoth Lakes, 437 Old Mammoth Road, #R, Mammoth Lakes, CA 93546
- Comments may also be provided via email: Wendy.Longley@dot.gov or hhayes@townofmammothlakes.ca.gov

Reds Meadow Road Improvements Project

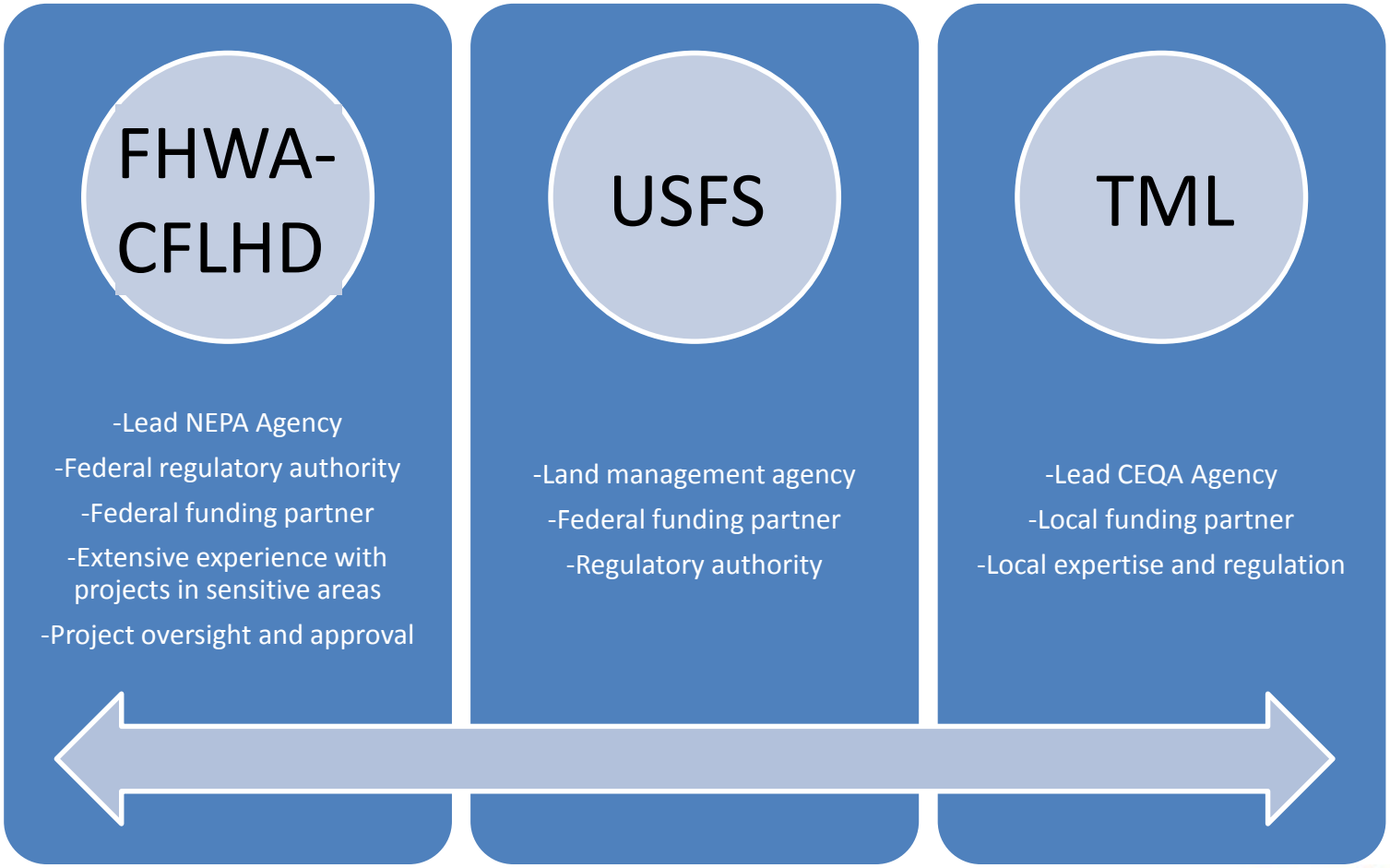
Purpose of Today's Hearing

- Discuss preliminary design and the draft NEPA/CEQA analysis and documentation
- Provide an update on what's been accomplished to date, and describe next steps
- Answer questions, engage and inform the public, and receive comments on the Draft NEPA/CEQA document

Project Overview



Project Partners



CFLHD Project Portfolio

CFLHD Project Portfolio

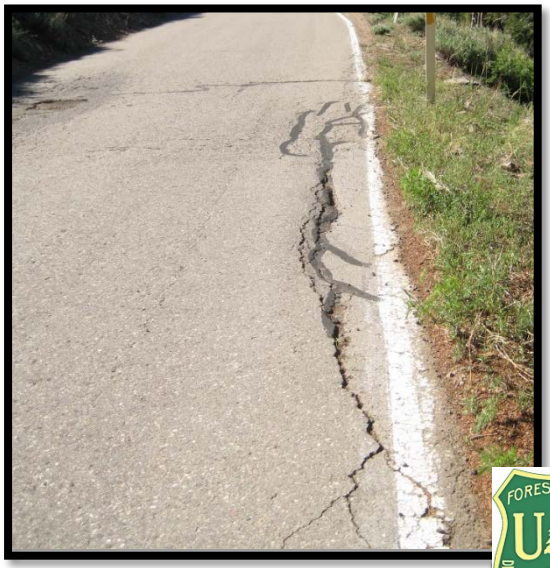
Purpose and Need

Purpose

- Improve the deteriorated roadway condition
  - Ensures access to recreational resources
- Improve roadway user mobility/safety
  - Facilitates emergency response into/out of valley
  - Reduces likelihood of multi-modal traffic incidents

Need

- Deteriorated roadway conditions
  - Longitudinal cracks and edge deterioration of roadway
  - Structural integrity of slope fills
  - Localized saturation of base layers
- Access, mobility, and safety
  - One-lane traffic along upper 2.5-mile segment
- Emergency response
  - Inhibits quick emergency service into/out of the valley



Purpose and Need – Additional Factors

- Without improvements, the roadway will continue to deteriorate and impede vehicular access and mobility
- Maintenance activities provide only temporary roadway repairs and cannot address ongoing structural and drainage concerns
- Temporary road repairs will eventually be insufficient to maintain the roadway's integrity

What We've Accomplished

Environmental

- Stakeholder meeting (February 2016)
- Public information meeting (March 2017)
- Planning and Environmental Linkages Study (PEL)
- Cultural/historic/archaeological field survey
- Aquatic resources field survey
- Threatened and endangered species field survey
- Consultation with resource agencies and tribes
- Completed Draft Environmental Assessment/Initial Study, and CEQA Checklist

Design/Engineering

- Conceptual-level design plans
- Conceptual-level construction cost estimate
- Topographic survey of upper 2.5 miles and at DEPO intersection
- Retaining wall cost/benefit analysis
- Design Technical Memorandum (DTM)
- Preliminary Design (15%)

Initial Screening

- 9 alternatives screened against 18 criteria factors in 5 main categories

  5 Main Categories:

  1. Improving Roadway Deterioration
  2. Improving Mobility and Safety
  3. Constructability
  4. Community Values
  5. Environmental Resources

- 2 options for the upper segment and 3 options for lower segment were carried forward into NEPA/CEQA analysis

Upper Segment (Entrance to Agnew Meadows)

- One lane/two lane combination
- Continuous two lanes

Lower Segment (Agnew Meadows to Reds Meadow Resort)

- No Action (Existing Conditions)
- Rehabilitation
- Rehabilitation and realignment

Alternatives Evaluated in the EA

- No Action Alternative
  - NEPA requires analysis of consequences of taking no action
  - Provides baseline for comparing consequences of action alternative(s)
  - Includes standard maintenance and targeted repairs
- Preferred Alternative
  - Construct two-lane roadway on upper 2.5-mile segment with multi-purpose shoulder design option
  - Rehabilitate the 5.8-mile lower segment with minor realignment design option

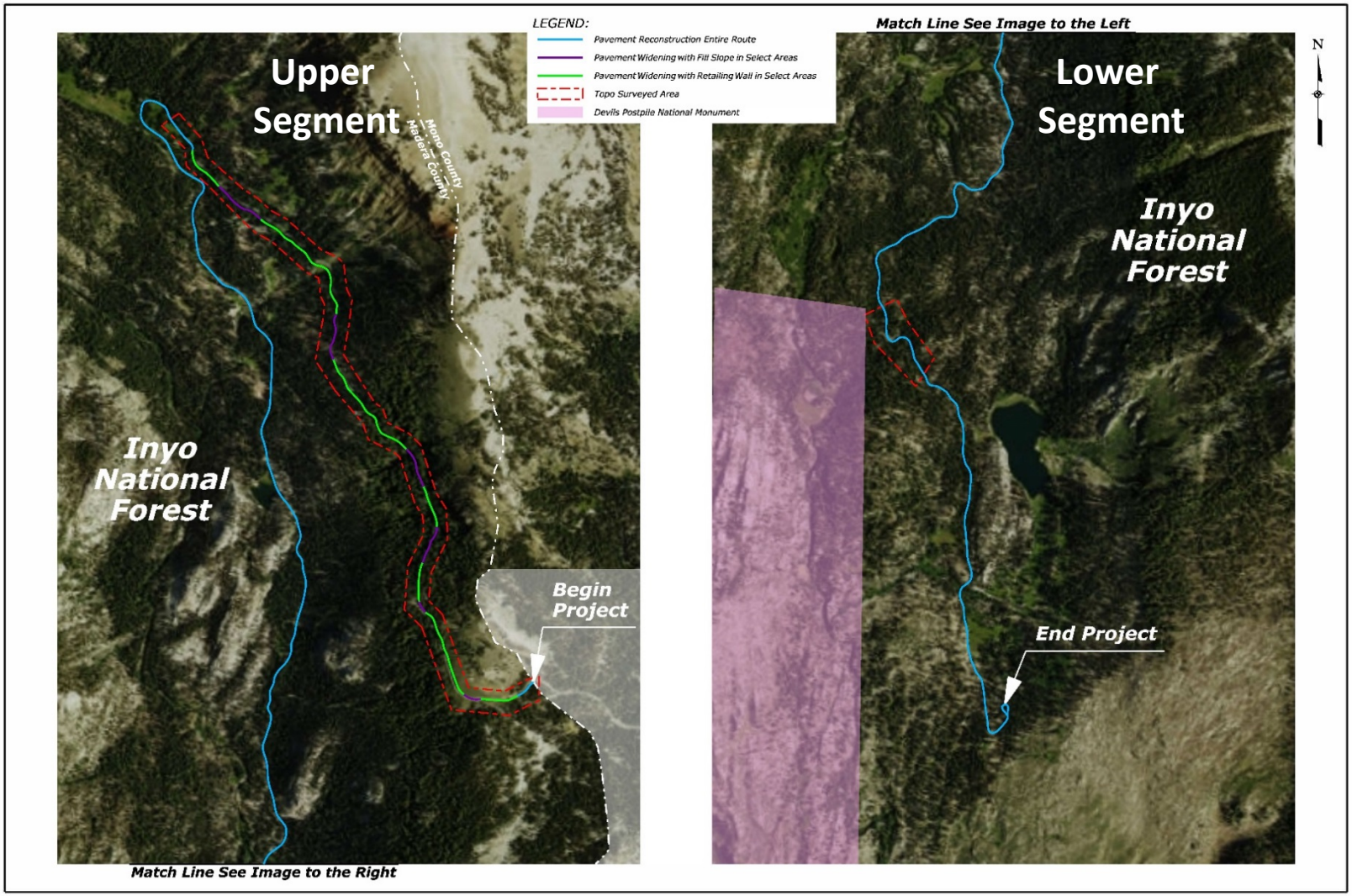
Design Summary

- Identified key constraints:
  - Maintaining access during construction
  - Steep topography
  - Narrow construction work zone

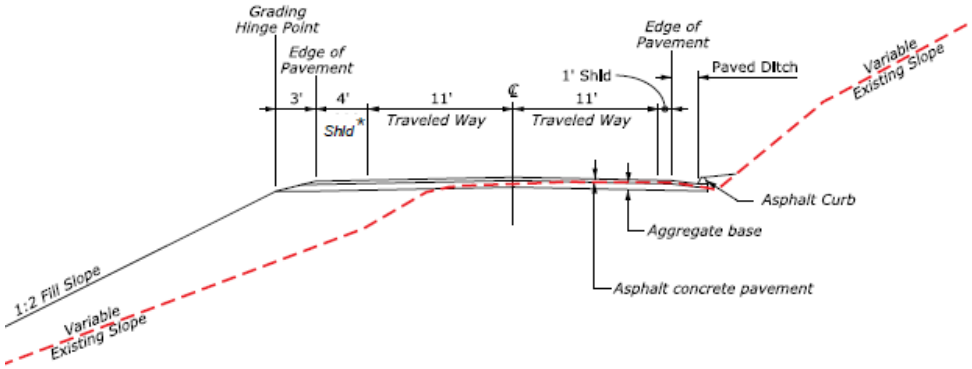
- Evaluated various road widening methods:
  - Cut slopes and cut retaining wall types
  - Fill slopes, rock buttresses and fill retaining wall types

- Developed 15% Design for upper 2.5 mile segment:
  - Alternative 2: One lane/two lane combination
  - Alternative 3: Widen to two continuous lanes
- Prepared construction cost estimates for each alternative:
  - Cost based analysis for significant construction items including traffic control, paving, retaining walls, and guardrail)
  - Historical cost data for other items (grading, drainage, erosion control and striping)
- Summarized design in a technical memorandum

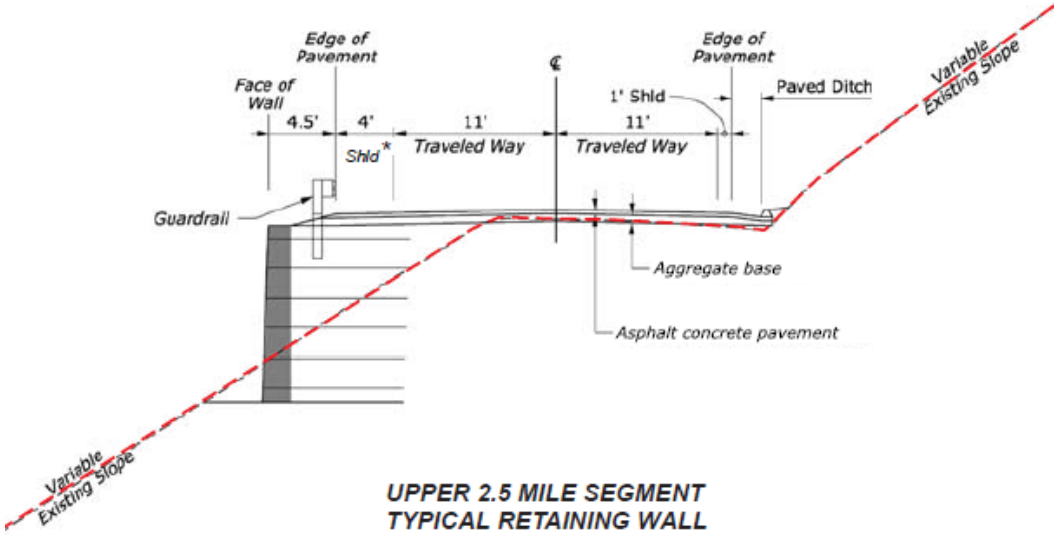
Preliminary Project Design



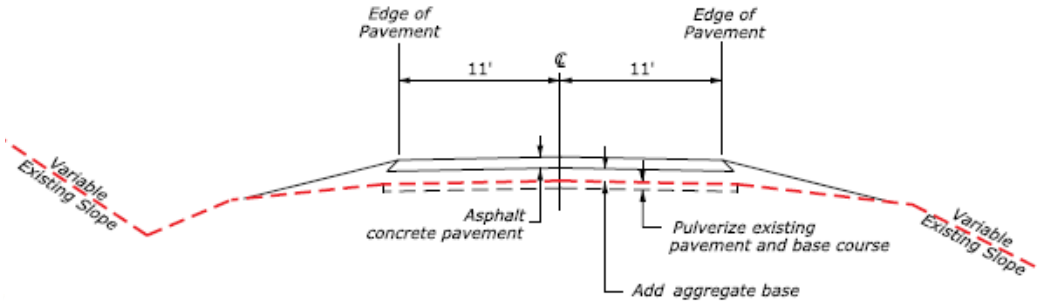
Preferred Alternative



UPPER 2.5 MILE SEGMENT
TYPICAL FILL SLOPE



UPPER 2.5 MILE SEGMENT
TYPICAL RETAINING WALL



LOWER 5.8 MILE SEGMENT
TYPICAL SECTION

Preliminary Construction Estimates

Alternative	15% Design Estimate		
	Upper 2.5 Miles	Lower 5.8 Miles	Project Total
1: Rehabilitation (pavement reconstruction) entire 8.3 mile length	$2.7M	$6.3M	$9.0M
2: Combination one/two-lane upper 2.5 miles and rehabilitation lower 5.8 miles	$9.2M	$6.3M	$15.5M
3: Widen to two-lanes upper 2.5 miles and rehabilitation lower 5.8 miles	$17.2M	$6.3M	$23.5M
4: Combination one/two-lane upper 2.5 miles and rehabilitation lower 5.8 miles with select road realignments	$9.2M	$6.8M	$16.0M

Notes: M = million U.S. dollars

Project was preliminarily shortlisted in FLAP program

NEPA/CEQA

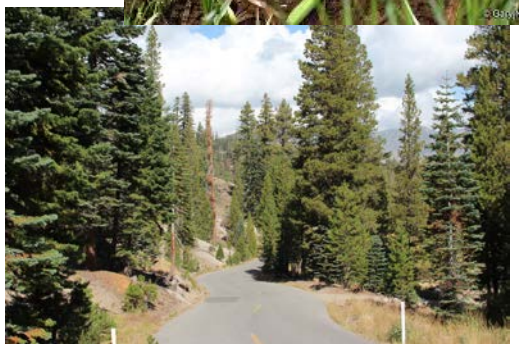
- Evaluated potential impacts to environmental resources
- Preference given to minimize/avoid impacts
- Engaged stakeholders/resource agencies/public/tribes
- Prepared Draft NEPA/CEQA document
  - Including avoidance, minimization and mitigation measures
- Established foundation for regulatory permitting

Environmental Analysis – Technical Disciplines

- Wetlands and Aquatic Resources
- Threatened, Endangered, or other Special Status Species
- Cultural (Historic, Archaeology, Paleontology) Resources/ Section 4(f)
- Visual Resources
- Recreational Resources
- Bicycle and Pedestrian Access
- Noise
- Water Quality
- Land Use
- Economics
- Air Quality
- Cumulative Impacts

Environmental Analysis Results

- Wetlands and Waters of the U.S.
  - No wetlands identified
  - Waters of the U.S at existing culvert crossings
  - Limited impacts within Riparian Conservation Areas
- Biological Resources
  - No listed plants to be impacted
  - Low potential to for Sierra Nevada yellow-legged frog and Yosemite toad to occur
- Cultural Resources/Section 4(f)
  - Two sites/features evaluated
  - No adverse effects to historic properties
  - Section 4(f) finding of *de minimis* impact



Environmental Analysis Results

- Visual Quality: Low to moderate levels of visual change

Existing Conditions

Existing Conditions

Existing Conditions

Simulation

Simulation

Simulation

Environmental Analysis Results

- Economics, Land Use, and Recreational Resources
  - No permanent impacts to shuttle service
  - Access to Reds Meadow Resort and recreational resources will be maintained
  - Intermittent road closures possible during construction
  - Short-term construction-related impacts are possible
- Air Quality
  - No long-term air quality impacts.
  - Measures would be implemented to mitigate dust during construction
- Utilities
  - Waterline, telephone cable, and electric are expected to be remain as-is; however if needed, would be relocated within the roadway prism
- Traffic/Transportation and Pedestrian/Bicycles
  - Long-term improvement to mobility
  - Maintain one-lane of traffic during construction with intermittent road closures
- Emergency Services
  - Long-term improvement to emergency access
  - Maintain emergency access during construction
- Cumulative Impacts
  - No significant cumulative impacts

Schedule and Next Steps

- Complete resource agency consultation (Fall 2017)
- Draft EA/IS public circulation and comment period (summer 2017) – Released for public comment from September 1 to September 30, 2017
- Final EA/IS and NEPA/CEQA decision document (fall/winter 2017)
- Secure funding for final design and construction (Final FLAP program decision 2018)
- Final Design (dependent upon funding, tentatively 2018 and 2019)
- Construction (dependent upon funding, 2022 and 2023)

How to Provide Comments

Comments can be provided in the following three ways:

- Talk to the court reporter
- Fill out a comment form and put it in the drop box or submit written comments to:
  - Wendy Longley, FHWA, CFLHD (HFPM-16), 12300 West Dakota Ave., Lakewood, CO 80228
  - Haislip Hayes, Town of Mammoth Lakes, 437 Old Mammoth Road, #R, Mammoth Lakes, CA 93546
- Comments may also be provided via email: Wendy.Longley@dot.gov or hhayes@townofmammothlakes.ca.gov

Reds Meadow Road Improvements Project
Draft Environmental Assessment/Initial Study - Public Hearing
September 7, 2017

Comment Form

Please complete the following form to ensure that your opinions and concerns will be noted. Please drop the form in the Comments Box in the room or mail to one of the following two project representatives:

- Wendy Longley, FHWA, CFLHD (HFPM-16), 12300 West Dakota Ave., Lakewood, CO 80228. Comments may also be provided via email: Wendy.Longley@dot.gov.
- Haislip Hayes, Town of Mammoth Lakes, 437 Old Mammoth Road, #R, Mammoth Lakes, CA 93546. Comments may also be provided via email: hhayes@townofmammothlakes.ca.gov

Please note your comment will become part of the public record.

Do you have any comments, questions, concerns, or additional information about the Proposed Project being evaluated in the Draftto Environmental Assessment (NEPA)/Initial Study (CEQA)? (Feel free to use the back of the page if you need more space.)

Please provide your contact information if you would like the project team to provide a response to a question.

REDS MEADOW ROAD IMPROVEMENTS PROJECT

ORIGINAL

SEPTEMBER 7, 2017

5:00 p.m.

MAMMOTH LAKES COUNCIL CHAMBER

437 Old Mammoth Road, Suite Z

Mammoth Lakes, California 93546

Reported By: Miranda Rumsey, CSR 14199

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A P P E A R A N C E S:

Wendy Longley: Project manager

Brett Weilland: Project manager

Ed Henderson: Lead designer

Jason Reynolds: Environmental specialist

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MAMMOTH LAKES, CALIFORNIA

THURSDAY, SEPTEMBER 7, 2017

WENDY LONGLEY: All right. Good evening, everyone. Thank you for coming to the public hearing for the proposed improvements to Reds Meadow Road. I'm Wendy Longley, and I'm with Federal Highways, Central Federal Lands, and I'm the project manager for the project. With me here tonight, I have some folks from my team in the back there, Kimberly Bellish, she's the environment protection specialist. And then with our A&E team, we have our lead designer, Ed Henderson, project manager, Brett Weilland, and environmental specialist, Jason Reynolds. We also have the town and forest services present here as well. So what we'd like to do this evening is run through our project presentation, and then we're gonna open it up for a more formal question-and-answer period, and after which, we'll have an open format so you can kind of walk around, ask additional questions, make comments to the court reporter.

All right. So the purpose of today's meeting is to really walk through what we've accomplished to date, and that includes our preliminary design and our environmental analysis for both NEPA and CEQA. And then

also, you know, here to answer any questions, take down comments on anything that you have on the project, whether it be the environmental analysis completed today or on any of the design issues.

Project partners. There's three main agencies involved. So Central Federal Lands, the U.S. Forest Service National Forest and the Town of Mammoth Lakes. So we'll start with the forest service. What is their role? Obviously, they're the owner and maintainer, current maintainer of the roadway, they bring a lot of local expertise on the region, the use of the road, and the resources. While they are the maintaining agency, there is precious little money to do that ongoing maintenance and certainly not enough to address the long-term issues on the road for that long-term stability. So with that, they identified a need for the project and came to Central Federal Lands asking our assistance to kick off planning studies, some preliminary design, and the environmental analysis. So the town of Mammoth Lakes, again, another local entity with a lot of interest in the road maintaining access down for tourists, a lot of local knowledge of the resources and the use of the road, as well. Um, conversations between these three agencies happening over the past year, year and a half, the town has been

willing to come in and take over maintenance of the road from the forest service. As such, they were able to apply for federal funds under the Federal Lands Access Program, and that's a program where we allocate federal dollars for roads that are accessing for or on or through federal lands. So they were successful in getting short-listed through that program for funding this project. As a result of that, the town is the lead for the state environmental compliance. And, then, Central Federal Lands, like I said, the forest service asked us to be involved. We are the lead agency for NEPA, which is the National Environmental Compliance. To date, we've completed all of the planning and environmental studies. If the project gets final programming through the FLAP program, we will be the agency that will deliver the project through design and then through construction, as well. So I think the town and forest service, you all know what role they play and who they are. I thought I'd just take a brief minute and talk about who we are and why we're suitable to be involved in this project. So our agency works in 14 western states delivering, primarily projects for other federal agencies in local mid counties. So we do a lor of work with the forest service, the park service, BLM, and others. One of our primary programs is

administering the FLAP program, the Federal Lands Access Program. We do a lot of work in California. Kind of more recently in this region, projects including the Convict Lake Road, Rock Creek Road, Whitney Portal, kind of more in the past history, we did Mammoth Scenic Loop, as well. We've got a lot of expertise working in this kind of environment, rural, mountainous roads, with sensitive environmental resources, as well.

All right. So project overview. So the project starts at intersection with State Route 203 at the Minaret Vista Entrance Station. Proceeds about 8.3 miles to the dead end at the Reds Meadow Resort. For this project, we've designated two segments of the roadway, the upper segment and the lower segment. And that designation is really based on current condition and proposed agreements. So that upper two and a half miles, as you know, descends pretty steeply into the valley. It's a narrow, one-way configuration with multiple pullouts. The average roadway width is 16 to 21 feet. We're seeing poor pavement condition, a lot of distress due to drainage issues, heavy traffic, fill slopes, things that in the long term, these ongoing yearly maintenance efforts are not gonna address. The lower segment is 5.8 miles on a flatter, gentler grade, pavement's in better condition, and we have a more

consistent 22-foot width.

So with these two segments, the project really is a reconstruction and widening on that upper segment, and then a rehabilitation on the lower segment. We do not have any plans to have any components that would change the vegetation management on the road. All right. With that, I'm gonna turn it over to Brett, and he's gonna kind of jump into what we've done to date, and then the environmental analysis.

BRETT WEILLAND: Okay. So the effort to date has really been broken into two separate tracks. We had the environmental effort, and also the design-related activities. As far as the environmental work and our public outreach, we held a stakeholder meeting in February of 2016. That was done as part of the planning and environmental linkages effort. And, really, that is a high-level planning document. It's intended to generate the purpose and need of the project, and also the high-level analysis of the alternatives which is then fed into the NEPA document which is where we are right now. That PEL document was completed in 2016. We also held a public information meeting in March of this year. We took advantage of this last field season and completed a lot of our field activities with cultural, aquatic resources, and the T&E species surveys are all

completed. Also conducted a lot of agency consultation. We've completed the draft environmental assessment/initial study and CEQA checklist, which is why we're here today.

From an engineering standpoint, the conceptual-level design plan and cost estimate were completed as part of the planning and environmental linkages study. Again, that was just the high level analysis to kind of get a feel for the cost. We completed the topographic survey in the upper two and a half miles and also that Devils Postpile entrance. Um, that information was used to feed into our preliminary designs. So, like I said, during the PEL phase, we had the high level of conception design. We advanced that once we had the topographic survey into more of a preliminary 15 percent design level on the upper two and a half miles, and all of that design information will summarize in the design memo.

So the purpose and need of the project. The purpose is really driven by two key factors. The first is to improve the deteriorating roadway. Just to make sure that we're maintaining access down to the recreational resources in the valley. And, secondly, we want to improve the roadway user mobility and safety. Just to make sure that we have that emergency response

in and out of the valley moving as it should, and, also, reduce the likelihood of the multi-modal traffic incidents, and I'll talk about that in a minute.

The purpose of the project is supported by two separate need criteria, or factors. First off is the deteriorated roadway condition, and you can see from that photo here in the bottom right corner, we get a lot of cracking along the edges. A lot of that is due to the drainage of the roadway when we're getting a lot of water. On the inside shoulder, it's getting underneath the pavement and kind of, as you can see, it's a lot of water through there. Secondly, with the access, mobility and safety, you can see in the top photo with the narrow roadway, there's a lot of user conflicts. We have the largest shuttle busses when they're coming in or out and you have opposing traffic in the same location. There's not enough pullouts right now for that narrow roadway to make those move like they should. And, then, like I said before, with the emergency response, just having that know narrow roadway, it really inhibits the ability for the emergency responders to get in and out of the valley quickly. And further supporting the need, right now there's a lot of maintenance activities that occur to keep the road where it should be.

At some point, and that's not gonna be enough, and as the road continues to get worse, at some point the roadway will have to be shut down, and it will prevent access down into the valley.

So then the initial range of alternatives, and this goes back to the planning and environmental linkages document that we did. We started with nine alternatives and it was a combination of on-alignment as well as a couple off-alignment alternatives, and we screen these against 18 different factors that we summarize into five categories. A lot of this went back to summarizing them based on purpose and need and the factors that we identified there. So the first is to improve the roadway condition, to just let that surface, what that surface of the roadway looks like. Secondly, was improving the mobility and safety, some of the user conflicts was the narrow roadway. Constructability. Community values, just making sure that what we're putting in is what you guys want. Then, also, environmental resources, just making sure that we're reducing the impacts as much as we're able to. All of the screening put us down to two options for the upper segment and three options for the lower segment, and we carry these into the NEPA analysis.

In the upper segment, as Wendy had mentioned,

that's from the fee station down to Agnew Meadows. We have a combination of a one/two lane alternative, and this would be resurfacing the roadway with select widening to improve sight distance in some areas. And the second one is continuous two lanes, so a full widening of the two and a half.

For the lower segment, from Agnew Meadows down to the resort, we advance a no-action alternative, so that's essentially the baseline for comparison purposes. We also advance the rehabilitation, so putting a new surface on the roadway, and then a combination of the resurfacing and some potential realignments in select areas like at the entrance to the Postpile Monument.

So that was the initial range of alternatives. Those boil down and advance into NEPA. When we evaluate in detail the NEPA document, there's the no-action alternative that I mentioned before, and, again, this is just to provide the baseline that includes the standard maintenance and targeted repairs. And then also the preferred alternative, and Ed will talk about this in a little bit when he gets out here, is essentially to construct the full two-lane widening on the upper two and a half miles, with the multi-purpose shoulder is a design option on the outside.

And then on the lower segment, it'd be to

rehabilitate with minor realignment, and, again, that's the select areas such as Postpile Monument.

ED HENDERSON: So, next, we want to dive a little deeper into the design. So Brett kind of gave you the overview at a high level what we have walked through from an engineering perspective, but we kind of want to take it a little deeper. So, you know, what's really unique about the site is, we wanted to make sure that we understood all the constraints involved, and what transpired is, we physically walked the course, you know. We stepped every foot of the first two and a half miles all the way down to Agnew Meadows, and then drove all the way down to the end of the project, really to understand all of the site considerations. And where that came into play is how we evaluated all the alternatives that Brett presented during the conceptual designs. So we really wanted to understand the constructability of each alternative and, ultimately, what the cost would be associated with this alternative. And so beyond the conceptual analysis that was developed during PEL study, we found that the upper two and a half miles just had some significant design challenges, the cost, locations associated with it. And so, as Brett mentioned, we went ahead and moved forward with doing a topographic survey over that upper two and a half miles,

and what that allowed us to do is do a more pre-initial analysis of the concepts that had been repaired, so we can look at whether we needed to construct, create some fill slopes to widen the road, if we need to put in retaining walls, if we need to construct retaining walls, what type of walls should be build, how tall will they be, how much they will cost. So, really, just allowed us to gain a greater confidence level with the design options, as well as the cost associated with it.

And so what you'll see here on the slide, as far as considerations is, we need to maintain access during construction, and so in that upper two and a half mile segment, we can make sure that we can move the busses and the public on that road while we're still widening and providing for the public. Obviously, we have ski topography and the narrow construction work zone. So we evaluated various road widening methods. Do we widen out the fill side of the road with walls? Or can we move to the cut side with some cut slopes or some retaining walls? And so those options were weighed in the 15 percent design, and we'll continue to evaluate to optimize the widening as we advance beyond this environmental phase. But each of those solutions as to how we widen the road will bring their own challenges.

So as part of that third bullet there, part of the

15 percent design for that upper two and a half miles, we develop a cost-specific estimate for each of those, and we dug a little bit deeper in this, in the sense that we did a cost-based analysis. And what that means is, we looked at the local supplies and materials, how long would it take to haul from the local asphalt plant or the quarry. So really try to develop a site-specific cost estimate, as opposed to just simply utilizing the historical cost data base. We really focus that effort on sort of the significant or high-cost items. Again, to just bolster our confidence level in the process of it. Ultimate, where the leads to is, how much funding is needed to really move this project beyond the environmental process. As Wendy mentioned, that information fed into the Federal Land Access Program application that the town submitted and gave that higher confidence level to these costs were appropriate for the selection panel to endorse.

Ultimately, all of this analysis could summarize into the design technical memorandum. And, really, the purpose of this memorandum is to inform the environmental document and process, so that we can memorialize that, and we can carry it beyond the environmental process and carry it into the design.

So next here on this slide, these cross sections

are really to hope illustrate what I'm talking about in the prior slide. And so for the preferred alternative in the upper left, we looked at locations where we could achieve widening the road, which you can see the red dash line represents a cross section of the hillside dropping down into the valley. The red represents the ground, and the widening in this scenario would occur on the outside with the graded hill slope, and that would achieve two travel lanes with the shoulders.

In other locations, this typical section is representing where it's just too steep to grade a slope. The slope would carry way down the hill, never catch. In this location we proposed installing a retaining wall. It would keep our project footprint narrower at fewer environmental impacts, yet still achieve the widened roadway cross section that we're looking for. This last cross section in the lower left, that's a typical section for the lower 5.8 miles down in the valley, when we're looking really just to rehabilitate the existing pavement. What's involved there is, basically, pulverizing the existing pavement and putting back the more structurally competent layer of asphalt, as well as aggregate. And so this section represents that we just, with a few inches of raising the elevation of the road, accomplish that more competent pavement

that's gonna serve a better design.

Here on this slide, now, we're kind of looking at an aerial view, the corridor is broken into two pieces. The view on your left, you're looking at the beginning of the project here up at the entrance station, and, then, as it descends sort of in a northerly direction down into the valley for Agnew Meadows. The color, I don't know if you can see it from there, we've got it on these poster boards or we can look at it afterwards. But, basically, representing the extent of where we think we can achieve the widening of the fill slope versus a retaining wall. So the purple, which is hard to see, is where we can achieve it with the fill slope. The green is representing where it's being retained. So, really, this year, we need a lot of retaining walls up unless, you know, and as we advance through the design, we'll look to optimize and reduce any of the walls as needed. The red just outlines where we performed the topographic survey, as I mentioned before, it allows us to do the three-dimensional analysis.

Over here on the right is a southern half of the project. The purple box that you see there is outlining the Devils Postpile National Monument property, and, then, showing the determinants of the project. And, then, another little red box, as Brett mentioned, where

we did an additional topographic survey to evaluate whether we can realign Reds Meadow Road near the entrance to Devils Postpile.

Last, as I mentioned before, all this effort is really to [inaudible] cost estimates, this is a summary of those costs. It presents the four alternatives that were considered during the design process. Alternative 1 is simply rehabilitating the pavement for the entire corridor, no widening, and that's about nine million dollars. So, effectively, about a million dollars a mile, if you think about it in those terms. The next Alternative was the combo Alternative, where the upper two and a half miles, we'd do selective widenings, and, yet, still maintain portions of the one-lane conditions. The project costs go up to fifteen and a half million, and so the main contributor to that were the wall costs that we were depicting on the prior graph. Walls are expensive to build.

The third Alternative was the full two-lane widening for the full upper two and a half miles. The cost jumped up to 23 and a half million. Again, we just need more walls to achieve.

The final Alternative that was analyzed in the cost estimates was the combination of the one lane/two lane, which is similar to Alternative 2, but it also

introduced the selective road realignments down in the valley, Devils Postpile intersection. And if you compare that cost to the Alternative 2 cost, it's just about a half million extra to achieve that realignment. So next we're gonna have Jason dig a little bit deeper into the environment.

JASON REYNOLDS: So you've heard the environment mentioned a few times, you've heard the Federal efforts with NEPA, and the state process with CEQA. We've completed a joint document. This public hearing is actually part of that environmental process. We're here to solicit your input, share information, give an overview of what we've done relative to assessments, avoidance, extermination, minimization, mitigation measures. So what we've done is we've created a summary, a series of technical studies have gone out since they've been completed. And that's captured in that summary document. For those of you who maybe don't know, there are copies, hard copies on the desk. The County of Lakes, it's available online. So if you want to review it, or portions of it, it is at your disposal.

As part of the process, our focus has been through interactions with Ed on the design but also evaluating construction methodologies, is what can we do for avoidance on minimization first. That's really a part

of our understanding and our purview. And, then, based upon that evaluation, what are the corresponding affects, where are the impacts, and then we need to consider on mitigation. We've gone through some engagement with stakeholders and public resource agencies, and that process has really helped inform our efforts as well, both our design, as well as our environmental efforts. So those have been informed and improved as a result of that effort. We are also going to be using the determinations and conclusions in the environmental document is our foundation for regulatory permitting, which is a future action which will take place with the engineers and the Regional Water Quality Control.

As I said, it's a summary. The documents of a summary of a technical analysis. These are the technical lists we evaluated. I have some more specific slides on more technical studies and the technical areas further on. This just gives you an overview of the subtopics that we've evaluated looking at them from both a project, post-project condition, but also from construction methodologies, the timelines and how temporary affects might also impact these resources.

So these are three specialty areas that we looked at that were part of our comprehensive analysis. We

recognize that these are resources in our area they really are special, they're unique, they demand a high level of attention. As part of the jurisdictional or aquatic evaluation, we did a lot of survey work, and we identified that we do have Waters of the U.S., there actually are 12, 12 features that intersect with the roadway across the roadway in culverts, 11 of the 12 are unnamed. They're seasonal. The 12th is Reds Creek, which is near the southern end of the project. We also have looked at the Riparian Conservation areas, consistent with U.S. Forest Services definition, and we'll be addressing that during our opening process, as well.

Biological resources, we did a full speed of surveys, evaluations, habitats, plants, and animals. We have gone through and just completed the U.S. Forest, excuse me, U.S. Fish and Wildlife Services, Section 7, consultation process, and that was focused around the Yosemite toad, and the determination from them was provided on August 11th of this year, and the determination was may affect but not likely to adversely affect. It's a formal term that it effectively show [inaudible] the impact that. And then, finally, we have some cultural resources. We have been conducting the consultation process with the State Historic

Preservation Office, SHIPO. There's a section 106 process. That process is nearly complete. We're waiting for their final concurrence on [inaudible] determination. But we did want to find a couple sites that needed special attention. We do have some measures in place based upon potential discovery, but as indicated, we are not anticipating any adverse effect. And that same determination is also what helps with Section 4(f). Section 4(f) is a protection measure for recreational resources, historical resources, wildlife refuges, and it's actually very, very specific about avoidance and not use of those properties. With no adverse effect, we are able to support and a determination.

So we also visual -- recognize the corridor, the area is beautiful. Visually striking. So we did do a visual impact analysis. We followed a number of different methodologies, common methodologies, and procedures from a number of sources. The Federal Highway of Administration has a visual impact assessment guideline. We follow and use that to create. We did use a land management plan from the International Forest, and we also used the U.S. Forest Service's visual management strategies. So all of those were part of our visual impact analysis. What you see here on the

top row of photos are existing conditions, and the bottom rows are simulated post-project conditions. And we're gonna talk about retaining walls, this is a simulated retaining wall. The other two show improved roadway and with, some of the removal of trees or some encroachment, as you can see into the cut slopes, to try to simulate what the project would look like after construction. So a visual impact analyst looked at these things and tried to make sure that we had evaluated the protection and evaluation of those resources as well.

So you saw earlier on a slide that the entire sweep of technical areas evaluated amongst here is the results from our analysis. I can't tell you again that each one of these is looked at from both a post-project condition, but also a construction evaluation scenario, and each of them has incorporated within a summary document, a sweep of avoidance of minimization and mitigation measures.

WENDY LONGLEY: All right. So where do we go from here? As Jason mentioned, we are in the process of disputing some of the required resource agency contributions. We anticipate that will be wrapped up within the next month or two. We do have the draft environmental assessment initial study out for review.

That is going on right now. We are taking comments through the end of September. We expect to have the final document that would address any comments or information that come out of this process here. And the decision document in late fall, early winter. So 2017, early 2018. So securing funding, we anticipate getting final programming from the FLAP program in February-March timeframe of 2018. Final design, finishing up through 2018-2019, and then if it does get programmed in FLAP, it's tentative program for construction 2022 and 2023. It would be a two-season project. And, then, afterwards, we have kind of that timeline illustrated over here, visually, so you can kind of see where we are, and you'll see a gap in '20 and '21. We're gonna go ahead and proceed with the design completed, that way funding becomes available early. We're ready to go with the project. If we need to do any selective tree clearing early, that type of thing, is accommodated by the gap in that timeframe.

So if you have comments, have you provide those to us. You can talk to the court reporter here this evening. We have comment forms on the desk in the back. You can complete those and either mail them or e-mail them, preferably to myself, but the town will also take them as well. Yeah, or you can, like I said, you can

mail them or e-mail them. So I think that was all we had. So I'll open it up to questions. We've got the court reporter here, so your questions that you'd like documented, now's a good time. If you don't feel comfortable asking it in front of the group, that's fine. We'll be here until 7:00 wandering around the boards if you have specific questions. Yes?

PUBLIC SPEAKER 1: Earlier you mentioned that the maintenance is being shifted from forest services to the town of Mammoth. Where is that process now and who's that -- does that wait until the new road's built or has the town started? Where is that? IS that a question for the town guys or for you?

WENDY LONGLEY: Well, I can answer it. I mean, I don't know, that's kind of between the town and the Forest Service before the project gets constructed. I assume that it's going to be maintained as it is right now. As part of the project, we will be executing the highway easement, that will give the town the authority to do the maintenance on the forest service property. So, certainly, by the time we're completed, that transition will have occurred. I would assume, and I don't know, but I would assume the forest service is gonna be teaming up until the maintenance on the project comes to a close. I'll get her in the back, and then

I'll get you.

PUBLIC SPEAKER 2: I was wondering where the seven dollar fee currently goes, if it goes to the park service or it's split between the park service and forest service, and the one dollar that goes to town, if they're posing to take to offset their maintenance costs?

WENDY LONGLEY: I'm gonna refer that to, who wants to answer? Forest service? Town?

SPEAKER FOR FOREST SERVICE: I guess it depends on the fee. The vehicle fee is collected by the forest service, the fee collected for the shuttle service goes to ESTA, and we get a small percentage of that, the forest service does.

PUBLIC SPEAKER 2: The vehicle fee goes to the park service?

SPEAKER FOR FOREST SERVICE: Yes, one hundred percent of it does.

PUBLIC SPEAKER 2: Goes to the Park service?

SPEAKER FOR FOREST SERVICE: Forest service.

PUBLIC SPEAKER 2: But not to the park service?

SPEAKER FOR FOREST SERVICE: Correct.

PUBLIC SPEAKER 3: Isn't there a one dollar surcharge or something?

PUBLIC SPEAKER 2: Yeah, that's what I was curious

about. I saw something in one of the documents where a dollar of it goes to the town of Mammoth Lakes.

SPEAKER FOR FOREST SERVICE: So we don't -- forest services don't plan to change our fee schedule for access through the valley.

PUBLIC SPEAKER 3: Right. So there's two things we're talking about here. We're talking about vehicle access, and then they're proposing a one dollar surcharge to the shuttle service for adult fares. That one dollar will go into the trust of the town for the future maintenance of the road. It's anticipated that the surcharge will start by next year, so by the beginning of construction --

(Off-the-record discussion.)

PUBLIC SPEAKER 4: I asked what the rationale was for choosing where the dollar surcharge would be allocated from, and he said that they chose the shuttle system because there's more dollars generated from the shuttle tickets than from vehicle tickets.

PUBLIC SPEAKER 5: This one, I think I need to compliment you guys on the fairness of this presentation, and as a frequent user of the Rock Creek Road, scenic route road, and the road up to Convict Lake, I'm very impressed with how that improvement has been handled. In other words, the improvements on the

highway, it doesn't look outwardly any different than the way it looked before. It's discrete, it blends in, and it's a very nice surface, and I think that the view and visual impact of the road going down to Agnew in particular, is very, very important. When you're hiking back to Minaret Lake, you don't want to look back at Mammoth Mountain and that slope and see an ugly highway on the hillside. And I think that those views are very important, and I just support this project because I think that 75 thousand people a year going down there right now, if those numbers are close, 50,000 people going on the bus. I think that there's people traveling by public transport to access the back country, even if it's just a short walk to Rainbow Falls or to the Postpile. To be frank, I think a lot about our southern California guests are currently probably terrified to drive on that road, and even when it's improved, I think that that road would be way outside of their experience, literally, anywhere. So they'd be a lot more relaxed using public transport and closing their eyes. So I support the project. The engineering, I'm sure, is going to be a challenge, there's a lot of water and that steep slope. That is a project that will allow access to many, many people to go to back country with minimal damage to the environment itself. My other hobby

besides backpacking is cycling, and it's a wonderful road to cycle. You go down almost as slowly as you go up it these days with the pavement. It's a wonderful asset, simply a bike ride, that is so unique in this. So congratulations on a great presentation. Thank you.

WENDY LONGLEY: Thank you.

PUBLIC SPEAKER 6: As I understand, the town of Mammoth Lakes would not take over the maintenance of the road, if it were to be a one and a half or one with pullouts, it has to be two lane for the town to take on maintenances there? Can you kind of explain more of the rationale behind that?

WENDY LONGLEY: I don't want to speak for the town on that. I think there were some discussions on consideration of safety and risk, if they're gonna be taking on maintenance, and, certainly, a two-lane roadway minimizes those safety concerns. It is our preferred alternative in the environmental document right now, and it is what was put into the access program application. I don't know if you want to add anything to that?

UNIDENTIFIED SPEAKER: Sure. We agreed -- can you hear me? We agreed with the preferred alternative and that was what the town applied for in the FLAP application. We had a number of discussions about that

alternative and what would be best for the long term of the project, and the town felt it would be best to have the full billed out, the best project possible, if we could take over full maintenance of the road.

WENDY LONGLEY: Any other questions?

PUBLIC SPEAKER 6: So as you relandscape the slopes or you're changing the grade, you'll have, or, initially, you'll have some bare spots. How do you -- who would -- would it be part of this project to rehabilitate those bare areas, or is that just waiting until the natural seeds just fill in?

WENDY LONGLEY: No, that's a good question. We absolutely do come in and reseed, sometimes that involves plantings, but we will reseed any disturbed areas, and we're, through the permitting process, required to do that, as well. We will not be able to get out of the state storm runner permits until vegetation has taken up over the seventy percent of the disturbed slopes. So it is absolutely something that we do include in the project, and I think you can go out, if you've driven Rock Creek, you can see what it looks like a year, two, three years out. Because you're right, as soon as we leave, the day we leave, you can tell that it was just reseeded, it's been sprayed with the mulch, so you can see it, but it does take hold

pretty quickly.

PUBLIC SPEAKER 6: So where would you get your seeding? Would it be plants that are just generally Eastern Sierra plants, or would you be more specific to what's on that slope and the hillside now?

WENDY LONGLEY: So at this early phase, we don't have that level of detail mapped out, but it's something that we work in close coordination with the forest service, their botanist, to identify what's native, what's gonna take at this elevation, it might not be the same seed mix at the top as it is at the bottom, although at the bottom we're not gonna have as much disturbance area. But that's something that we defer to the local expertise, to the forest service.

Any other you questions? All right. If you would like to roam, if you have questions for us individually, if you'd like to make a comment to the court reporter, please feel free to do that. We'll hang out here until everyone is done, and then we'll wrap up. Thank you.

PUBLIC SPEAKER 7: I'd like to add a comment to consider the alignment of the lower portion of the road for public safety. I think there have been some previous comments made by the resort owners of Reds Meadow and their safety concerns of the current

alignment of the lower portion of this road, and I would support looking at that, a realignment of that for public safety.

(The meeting concluded at 7:02 p.m.)

REPORTER'S CERTIFICATE

I, MIRANDA RUMSEY, a Certified Shorthand Reporter for the State of California, do hereby certify:

That the foregoing meeting was transcribed, by me, via machine shorthand, which was thereafter transcribed under my direction; that the foregoing transcript is a true record, within the best of my ability, of the proceedings given.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.

IN WITNESS THEREOF, I have this date subscribed my name.

Dated: September 25, 2017.

MIRANDA RUMSEY, CSR #14199

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Attachment 6. Concurrence Letter from California State Historic Preservation Officer

State of California • Natural Resources Agency Edmund G. Brown Jr., *Governor*

DEPARTMENT OF PARKS AND RECREATION Lisa Ann L. Mangat, *Director*
OFFICE OF HISTORIC PRESERVATION
Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

November 16, 2017

VIA ELECTRONIC MAIL

Reply in Reference To: FHWA_2017_0622_001

Ms. Wendy Longley, PE
Federal Highway Administration, Central Federal Lands Highway Division
12300 West Dakota Avenue
Suite 380
Lakewood, Co 80228-2583

Subject: Continuing Section 106 Consultation for the Reds Meadow Road Improvement Project (CA FTFS 03S11(1))

Dear Ms. Longley:

The Office of Historic Preservation (OHP) received your letter on November 13, 2017. The Federal Highway Administration, Central Federal Lands Highway Division (FHWA-CFLHD) is continuing consultation with the State Historic Preservation Officer (SHPO) regarding the above referenced undertaking in compliance with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. 470f), as amended, and its implementing regulations 36 CFR 800. The FHWA-CFLHD is seeking SHPO comments on their finding of effect.

FHWA-CFLHD, in cooperation with the INF, is proposing to improve Reds Meadow Road, located in Madera County, California. The purpose of the project is to enhance the condition of Reds Meadow Road and increase vehicular travel mobility. FHWA-CFLHD has defined and documented the area of potential effects (APE) as encompassing the full extent of all project activities and includes the realignment and widening areas, culvert installation areas, and turnout and staging areas.

Via letter dated September 28, 2017, the SHPO objected to FHWA-CFLHD's finding of no adverse effect. As a result, FHWA-CFLHD and the Inyo National Forest (INF) held a phone call with OHP staff and provided clarification and supplementation information to support their finding of no adverse effect pursuant to 36 CFR §800.5(b). FHWA-CFLHD has clarified the following in their letter received on November 13, 2017:

1. The culvert installation in the location of the known site, CA-MAD-749, will be replaced in kind and within the existing previous disturbed road prism. The culvert will not be upsized or lengthened but will match existing. An archaeological monitor will be on-site during the removal and replacement of the culvert; and

2. FHWA-CFLHD redacts the proposal to conduct any phased archaeological testing of CA-MAD-749 that may be present beneath the road prism.

In previous consultation with the SHPO, identification efforts at CA-MAD-749 included a recordation of the resource and subsurface testing of the site to determine the potential for buried cultural deposits within the APE. Far Western observed nearly 100 surface pieces of debitage in the APE eroding out of the roadcut on the west side of the road near the proposed culvert location. Shovel probes revealed buried materials in the central portion of the site on either of the road within the APE, and indicated that additional buried materials could be present within the APE. Far Western concluded that the presence of a deposit with depth and obsidian artifacts suitable for sourcing and hydration analysis contributes to the expected National Register of Historic Places (NRHP) eligibility of CA-MAD-749. For the purposes of this undertaking only, FHWA-CFLHD is treating CA-MAD-749 as eligible for listing on the NRHP under Criterion D.

FHWA-CFLHD has applied the criteria of adverse effect and finds that, while there will be effects to CA-MAD-749, they will not be adverse due to avoidance through the designation of an environmentally sensitive area (ESA) and flagged as such during construction. An archaeological monitor will be on-site during construction activities. The Big Pine Paiute Tribe will also be invited to provide for a Native American monitor for construction activities.

Based on FHWA-CFLHD's level of effort, they have arrived at a finding of no adverse effect for this undertaking and request my review and comment on their finding of effect. After reviewing your letter and supporting documentation, **I concur** with your finding of no adverse effect pursuant to 36 CFR 800.5(b).

If you require further information, please contact Natalie Lindquist at 916-445-7014 or Natalie.Lindquist@parks.ca.gov or Alicia Perez at 916-445-7020 or Alicia.Perez@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Attachment 7. Aquatic Resource Delineation Report, Revised January 2018