

DECEMBER 2007

MAMMOTH LAKES Police Station

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION
RESPONSE TO COMMENTS



Prepared for:
TOWN OF MAMMOTH LAKES

RBF
CONSULTING

RESPONSE TO COMMENTS
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Mammoth Lakes Police Station

LEAD AGENCY:

Town of Mammoth Lakes
437 Old Mammoth Road, Suite R
Mammoth Lakes, California 93546
Contact: Ms. Jen Daugherty
760.934.8989, X-260

PREPARED BY:

RBF Consulting
14725 Alton Parkway
Irvine, California 92718
Contacts: Mr. Glenn Lajoie, AICP
Mr. Eddie Torres, INCE
949.472.3505

December 5, 2007

JN 10-105933



1.0 INTRODUCTION

The Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) (see Public Resources Code Sections 21000-21177), as well as the State CEQA Guidelines (see Title 14 of the California Code of Regulations, Sections 15063).

The IS/MND was made available for public review and comment pursuant to State CEQA Guidelines Section 15070. The public review period commenced on October 29, 2007, and expired on November 27, 2007. The IS/MND and supporting attachments were available for review by the general public at the offices of the Town of Mammoth Lakes Community Development Department, 437 Old Mammoth Road, Suite R, Mammoth Lakes, California.

During the public review period, comments were received on the IS/MND from certain interested public agencies and private parties. The following is a list of the persons, firms, or agencies that submitted comments on the IS/MND during the public review period:

1. Terry Roberts, State of California Office of Planning and Research, State Clearinghouse, dated November 28, 2007 (attached as Letter 1);
2. Mack Hakakian, PG, Engineering Geologist, California Regional Water Quality Control Board – Lahontan Region, dated November 5, 2007 and received on November 13, 2007 (attached as Letter 2);
3. Dave Singleton, Program Analyst, Native American Heritage Commission, dated November 15, 2007 and received on November 19, 2007 (attached as Letter 3);
4. Gayle J. Rosander, IGR/CEQA Coordinator, California Department of Transportation, dated November 26, 2007 and received on November 26, 2007 (attached as Letter 4); and
5. Mary A. Dunnigan, Advocates for Mammoth, dated November 27, 2007 and received on November 27, 2007 (attached as Letter 5).

Even though CEQA and the State CEQA Guidelines do not require a Lead Agency to prepare written responses to comments received on an IS/MND, as contrasted with a Draft Environmental Impact Report (see State CEQA Guidelines Section 15088), the Town of Mammoth Lakes has elected to prepare the following written responses in the spirit and with the intent of conducting a comprehensive and meaningful evaluation of the proposed project.

The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.



2.0 RESPONSE TO COMMENTS



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

November 28, 2007

CYNTHIA BRYANT
DIRECTOR

Jen Daugherty
City of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Subject: Mammoth Lakes Police Station
SCH#: 2007102122

Dear Jen Daugherty:

The enclosed comment (s) on your Mitigated Negative Declaration was (were) received by the State Clearinghouse after the end of the state review period, which closed on November 27, 2007. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2007102122) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures

cc: Resources Agency

1-1



1. RESPONSES TO COMMENTS FROM STATE OF CALIFORNIA OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE, NOVEMBER 28, 2007.

- 1-1 This comment indicates that the State Clearinghouse submitted the IS/MND to selected state agencies for review, and that the comment period for the Draft EIR concluded on November 27, 2007. The comment indicates that the lead agency complied with the review requirements for draft environmental documents pursuant to CEQA. As such, the comment does not provide specific comments regarding information presented in the IS/MND.



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Secretary for
Environmental Protection

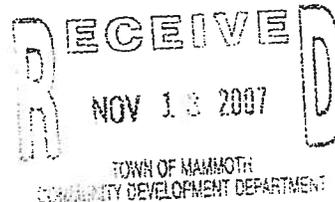
Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392
(760) 241-6583 • Fax (760) 241-7308
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

November 5, 2007

File: Environmental Doc Review
Mono County

Ms. Jen Daugherty, Assistant Planner
Town of Mammoth Lakes
Post Office Box 1609
437 Old Mammoth Road, Suite R
Mammoth Lakes, CA 93546
Fax (760) 934-8608



COMMENTS ON THE PROPOSED 13,000 SQUARE FOOT POLICE STATION, ON APPROXIMATELY 6.55-ACRE PARCEL, LOCATED ON THE NORTHEAST CORNER OF SIERRA PARK ROAD AND TAVERN ROAD, MAMMOTH LAKES

Please refer to the items checked for staff comments on the above-referenced project:

- [X] The site plan for this project does not specifically identify features for the post-construction period that will control stormwater on-site or prevent pollutants from non-point sources from entering and degrading surface or ground waters. The foremost method of reducing impacts to watersheds from urban development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of nonpoint source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters. Principles of LID include:
 - Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge,
 - Reducing the impervious cover created by development and the associated transportation network, and
 - Managing runoff as close to the source as possible.

2-1

We understand that LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and maintenance costs, and could benefit air quality, open space, and habitat. Planning tools to implement the above principles and manuals are available to provide specific guidance regarding LID.

We request you require these principles to be incorporated into the proposed project design. We request natural drainage patterns be maintained to the extent feasible. Future development plans should consider the following items:

- [X] The project requires development of a Stormwater Pollution Prevention Plan and
 - a NPDES General Construction Stormwater Permit and/or
 - a NPDES General Industrial Stormwater Permit

2-2

These permits are accessible on the State Board's Homepage (www.waterboards.ca.gov). Best Management Practices must be used to mitigate project impacts. The environmental document must describe the mitigation measures or Best Management Practices.

2-2

[X] The proposal does not provide specific information on how impacts to surface Waters of the State and/or Waters of the U.S. will be mitigated. These surface waters include, but are not limited to, drainages, streams, washes, ponds, pools or wetlands. Waters of the State or Waters of the U.S. may be permanent or intermittent. Waters of the State may include waters determined to be isolated or otherwise non-jurisdictional by the Army Corps of Engineers. The Environmental Document needs to quantify these impacts. Discuss purpose of project, need for surface water disturbance, and alternatives (avoidance, minimize disturbances and mitigation). Mitigation must be identified in the environmental document including timing of construction.

2-3

Mitigation must replace functions and values of wetlands lost. For more information see the Lahontan Region Basin Plan http://www.waterboards.ca.gov/lahontan/BPlan/BPlan_Index.htm.

[X] Other

- Please include both pre-construction and post construction stormwater management and best management practices as part of planning process.
- Please consider designs that minimize impervious surface, such as permeable surface parking areas, directing runoff onto vegetated areas using curb cuts and rock swales, etc., and infiltrating runoff as close to the source as possible to avoid forming erosion channels. Design features should be incorporated to ensure that runoff is not concentrated by the proposed project. The project must incorporate measures to ensure that stormwater generated by the project is managed on-site both pre-and post construction. Please show on plan drawings the on-site stormwater control measures.
- If the proposed project is located in an area that contains drainages, wetlands, surface Waters of the State, Waters of the U.S. or blue-line streams, we request that measures be incorporated into the project to avoid such features and provide buffer zones where possible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.
- Please consider development features that span the drainage channels or allow for broad crossings. Design features of future development should be incorporated to ensure that runoff is not concentrated by the proposed project, thereby causing downstream erosion.

2-4

J

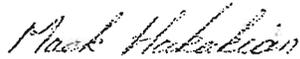
- Project may impact and alter drainages. We request that the project designs maintain existing drainage features and patterns to the extent feasible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.

2-4

Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required.

If you have any questions, please contact me at (760) 241-7376, or e-mail me at mhakakian@waterboards.ca.gov

Sincerely,



Mack Hakakian, PG
Engineering Geologist

MH/rc/CEQA comments/Mammoth Lakes Police Station



2. RESPONSES TO COMMENTS FROM THE LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD, DATED NOVEMBER 5, 2007.

2-1 Water quality impacts during operation of the project are analyzed in Section 4.8, Hydrology and Water Quality, in the IS/MND. This section describes the post-construction design features that would be incorporated into the project to control stormwater on site and prevent pollutants from degrading surface or ground water. Exhibit 6, Conceptual Grading and Drainage Plan, illustrates the proposed long-term drainage facilities for the project. As shown in Exhibit 6, drainage improvements are proposed east of the proposed building, including the following:

- V-shaped earth swales;
- A Level spreader;
- Curbs and valley gutters along roadways;
- Curb cut outlets;
- Storm drain pipes;
- A storm vault;
- Storm drain inlets;
- Connections to existing storm drain pipes;
- Two temporary infiltration ponds;
- Slotted drains; and
- Drains for underground parking structure (and possibly a pump).

Since metals are often attached to sediments, the proposed infiltration/retention facilities would also serve to reduce the introduction of metals into the storm drain system.

The quality of runoff water would also be managed with landscaping and sediment traps prior to runoff entering the retention/infiltration facilities. The proposed landscaping would be designed as part of the sediment elimination system and would be maintained throughout the life of the project. The project would also comply with Lahontan Regional Water Quality Control Board (Lahontan RWQCB) regulatory requirements regarding outdoor trash, storage areas, and storm drain stenciling standards. The final location and details of the permanent Best Management Practices (BMPs) to manage runoff during operation of the project would be determined during the final design plans for the project. Implementation of the prescribed mitigation measures and project design features, as well as compliance with the applicable regulatory requirements, including preparation of a Stormwater Pollution Prevention Plan (SWPPP), would reduce potentially significant impacts to water quality during project operations to a less than significant level.

The Low Impact Development (LID) practices/principles would further reduce long-term water quality impacts, but are not necessary to reduce the potentially significant long-term operational water quality identified in the IS/MND to a less than significant level. Pursuant to the Memorandum of Understanding (MOU) with the Lahontan RWQCB, the Town is responsible for ensuring compliance with applicable water quality regulations on projects on sites of less than five acres. As such, the Town, during its review of the use permit, would consider placing conditions on the project that are reflective of the LID practices/principles to further reduce long-term water quality impacts to the maximum extent feasible. Such conditions would be included within the conditions of development approval for the project and would be incorporated into the final grading and landscape



plans for the project. It is also acknowledged that many of the LID practices/principles are similar to the requirements included within the Town's grading ordinance and as such, would be implemented as part of the Town's standard grading practices.

- 2-2 As discussed in Response to Comment No. 2-1, the LID practices/principles would be considered by the Town during its review of the use permit. The Town would consider requiring conditions of approval that are reflective of the LID practices/principles, as such measures are not necessary as mitigation to reduce an identified environmental impact. Any such conditions would be incorporated into the final grading and landscape plans for the project. As further stated in Response No. 2-1, the LID practices/principles would further reduce long-term water quality impacts, but are not necessary to reduce the potentially significant long-term operational water quality identified in the IS/MND to a less than significant level.

As discussed in Section 4.8(a), the project is subject to compliance with the Lahontan RWQCB Water Quality Control Plan, which contains prohibitions, water quality standards, and policy implementation standards, in order to control storm water on site and prevent pollutants from non-point sources from entering and degrading surface or ground waters. Additionally, the proposed project is subject to compliance with Code Section 12.08.090. Following compliance with the recommended mitigation, and National Pollutant Discharge Elimination System (NPDES) and Code Section 12.08.090 requirements, project implementation would not violate any water quality standards or waste discharge requirements associated with long-term activities.

- 2-3 Based upon the findings contained within the *Environmental Analysis for Mammoth Lakes Community Facilities Land Acquisition*, prepared by the U.S. Forest Service in July 2006, there are no waters of the Waters of the State or Waters of the U.S. on-site. Additionally, there is no riparian habitat on-site. Impacts to jurisdictional features are discussed in Section 4.4, Biological Resources, in the IS/MND. As discussed in this section, the Biological Survey concluded there is no riparian habitat present on the project site.¹ Project implementation would not significantly impact any riparian habitat or other sensitive natural community. Additionally, the Wetland and Floodplain Report conducted for the Mammoth Community Facilities Acquisition involved the 11.057-acre Hospital parcel, inclusive of the project site. The Report concluded no wetlands exist on the project site.² Project implementation would not impact federally-protected wetlands through direct removal, filling, hydrological interruption, or other means.
- 2-4 Construction activities associated with the proposed project have the potential to produce typical pollutants such as nutrients, heavy metals, toxic chemicals, and waste materials, including wash water, paints, wood, paper, concrete, food containers, sanitary wastes, fuel, and lubricants. Impacts to storm water quality would occur from construction and associated earth moving, and increased pollutant loadings would occur immediately off-site. The proposed project's area of disturbance would be greater than 1.0 acre; therefore, the project is subject to NPDES requirements for construction projects (General Permit #CAS000002) enforced by the Lahontan RWQCB. To obtain

¹ USDA Forest Service, *Mammoth Community Facilities Land Exchange Environmental Assessment*, June 2006, Page 20.

² Andrew Breibart, Hydrologist, *Federal Mammoth Church Parcel Land Exchange Wetland and Floodplain Report*, October 1, 2004.



coverage under the General Permit, the project landowner is required to submit a Notice of Intent (NOI) prior to construction activities, and then prepare, have on site, and conform to a SWPPP during construction. Though the permit requirements are not anticipated, work shall conform to conditions of the Army Corp of Engineers, Lahontan RWQCB, and State of California Fish and Game. The proposed project is also subject to compliance with Code Section 12.08.090, *Drainage and Erosion Design Standards*, which outlines the drainage and erosion design standards that are required by the Town, beyond the RWQCB requirements. Following compliance with the provisions of the NPDES and Code Section 12.08.090, project implementation would not violate any water quality standards or waste discharge requirements associated with construction activities. Please refer to Response to Comment No. 2-1 for a discussion of post-construction BMPs.

Currently, a 42-inch storm drain discharges to a cobble swale that runs outside the length of the property line. This swale conveys runoff to two 48-inch corrugated metal piping (CMP) culverts that directly flow under SR-203. Three existing storm drain pipes that convey runoff from the west (not part of the project site) also discharge to the cobble swale. Recent improvements to the easterly side of Sierra Park Road have taken place in conjunction with Mammoth Hospital improvements. Project implementation would alter the existing drainage pattern of the site due to on-site grading and changes in impervious area. The proposed condition would involve more impervious area than the existing condition. For the 100-year storm, the total calculated on-site drainage is 4.12 cubic feet per second (cfs). It is anticipated that no on-site inlet would need to be larger than 2-by-3 feet. In addition, on-site pipe sizes would be sized upon final determination of Q's during the final design process. Details of proposed drainage facilities would be identified in a Final Drainage Study, once the site plan is finalized with greater detail.

Lahontan RWQCB provisions require that runoff from impervious and disturbed surfaces generated by a 20-year storm (one inch per hour intensity) be retained and percolated into the ground. In addition to the RWQCB requirement, the project is subject to compliance with Code Section 12.08.090, which specifies drainage standards regarding runoff calculations and design. The designs and calculations included in the Preliminary Drainage Study are for planning purposes. The final location and details of drainage facilities would be determined during the design process in preparation of the improvement plans and would be in accordance with Town of Mammoth Lakes requirements in place at that time. The criteria followed during the design would be required to address issues such as safety, erosion protection, and water quality, as well as conforming to the requirements of the Clean Water Act and the Lahontan RWQCB. As a result, drainage would not be concentrated and new erosion channels would not occur with project implementation.

Please refer to Response to Comment No. 2-3 for a discussion of drainages.

STATE OF CALIFORNIA

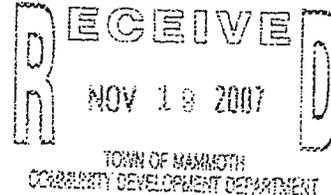
Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
 Web Site www.nahc.ca.gov
 e-mail: ds_nahc@pacbell.net



November 15, 2007



Ms. Jen Daugherty, Assistant Planner

TOWN OF MAMMOTH LAKES

437 Old Mammoth Road, Suite R
 Mammoth Lakes, CA 93546

Re: SCH#2007102122: CEQA Notice of Completion; Initial Study/Mitigated Negative Declaration for the Mammoth Lakes Police Station Project located in the Town of Mammoth Lakes, Mono County, California

Dear Ms. Daugherty:

The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.
 - The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- √ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
 - CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

3-1

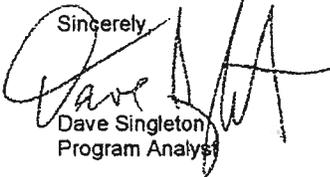
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√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning and implementation

3-1

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts
Cc: State Clearinghouse



3. RESPONSES TO COMMENTS FROM THE NATIVE AMERICAN HERITAGE COMMISSION, DATED NOVEMBER 15, 2007.

- 3-1 As discussed in Section 4.5, *Cultural Resources*, of the IS/MND, the cultural resources survey conducted for the Mammoth Community Facilities Acquisition involved the 11.057-acre Hospital parcel, inclusive of the project site. The cultural resources survey concluded there are no significant cultural resources or heritage resources on the project site.³

No conditions exist that suggest human remains are likely to be found on the project site. Due to the level of past disturbance on-site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. If human remains are discovered during the construction process, the Mono County Coroner's office would be notified immediately (California Health and Safety Code §7050.5) and all activities in the immediate area of the find would cease until appropriate and lawful measures have been implemented. If the Coroner determines that the remains are Native American, the Coroner would contact the NAHC (California Public Resources Code §5097.98). The NAHC would designate a Most Likely Descendent who will make recommendations concerning the disposition of the remains in consultation with the lead agency and project archaeologist.

It should be noted that the project does not involve a Specific Plan or General Plan Amendment, and therefore is not subject to the statutory requirements of Senate Bill 18 (Chapter 905, Statutes of 2004). It should be further noted that the project has complied with the public review requirements as set forth by the California Environmental Quality Act (CEQA) Guidelines (CEQA Guidelines Sections 15073, 15072, and Public Resources Codes 21092.3 and 21091 (b)). The Native American Heritage Commission was also notified during the 30-day public review period.

³ Nicholas A. Faust, North Zone Archaeologist, Inyo Forest, United States Department of Agriculture Forest Service, *Mammoth Fire Station and Community Church Land Exchanges, Heritage Resources Section 106 and NEPA Documentation*, October 21, 2004.

DEPARTMENT OF TRANSPORTATION

District 9
500 South Main Street
Bishop, CA 93744
PHONE (760) 72-0785
FAX (760) 87-0754
TTY 711 (760) 72-0785



Flex your power!
Be energy efficient!

November 26, 2007

Jen Daugherty
Manoth Lakes Community Development Department
P.O. Box 1609
Manoth Lakes, California 93546

File: 09-MNO
IS/MND
SCH #: 2007102122

Dear Ms. Daugherty:

Manoth Lakes Police Station – Mitigated Negative Declaration (MND)

The California Department of Transportation (Caltrans) appreciates the opportunity to review the MND for the proposed Police Station in the future Civic Center at the southeast corner of State Route (SR) 203 (Main Street) and Sierra Park Road. The conferences with Town staff and others on November 8 and 14, 2007 helped us understand Civic Center build-out progression for individual components (court, police station and local government offices). We will continue to work with the Town, Administrative Office of the Courts and Mono County to optimize safety, circulation and phasing. We have the following comments on the MND:

- We concur with the Station project providing a Sierra Park Road northbound right-turn lane onto SR 203 (TR-1, page 106). We understand that the Court project will provide the remainder of this lane. For a Monitoring Program, the Town needs to define (e.g. level of service change, collisions, etc.) what would trigger the "timing" for this lane. For simplicity, both projects could construct/stripe their portions of the lane then the Town open it concurrently with the last project built. 4-1
- The secondary Sierra Park Road access (for official court/police use) should be distanced to not interfere with the operation of the SR 203/Sierra Park Road intersection. It should also be aligned directly across from an existing driveway so not to create another "T" intersection. 4-2
- Since other options are available, Caltrans will not allow a Center transit stop on SR 203. Safety for both the pedestrians utilizing transit and through-vehicles could be improved by providing a stop within the Center or on a local road. If the Town elects to place this transit stop on Sierra Park Road, it should be south of the secondary access point. 4-3

Please continue to forward project information. We value a cooperative relationship with the Town and other agencies in traffic circulation for the Center. If you have any questions, I may be contacted at (760) 72-0785.

Sincerely,

GAY E.J. ROSANDER
IGR/CEQA Coordinator

cc: State Clearinghouse
John Ripperda, Administrative Office of the Courts
Mark Magit, Mono County
Steve Wisniewski, Caltrans



4. RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION, DATED NOVEMBER 26, 2007.

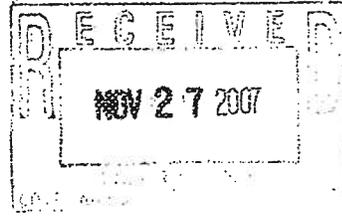
- 4-1 This segment of sidewalk is an important link with the community pedestrian circulation, and the Town has applied for grant funding for this project through the Safe Routes To School program and will continue to seek funds for the project. The right-turn pocket will be constructed in conjunction with this sidewalk project. The project is also listed on the Master Facility Plan and DIF funds are being collected for a portion of the project.
- 4-2 The Town will strive to locate the subject driveway with the cross driveway to the southerly McDonalds entrance. The Town will add a condition of approval to the use permit stating that the location of the north/secondary driveway shall avoid the creation of a "T" intersection to the extent feasible.
- 4-3 This comment is noted. At this time, a location for a transit stop on the site has not been identified. The location of a transit stop on the site will be discussed in conjunction with future development on the site. No transit stop is proposed in conjunction with the Police Station project.

November 27, 2007

To: Jan D. Dugherly

From: Advocates for Mammoth

Re: Comments on Mammoth Police Station Initial Study



Advocates for Mammoth would appreciate the following information regarding this Initial Study.

- 1 Please explain the justification for added building height (45') in exchange for underground parking in light of this variance no longer being necessary as an incentive to provide underground parking. | 5-1
- 2 Please cite the justification for the estimated number of parking spaces being provided on this project. | 5-2
- 3 Please re-analyse the traffic to include the morning peak hour when students are being transported to schools. | 5-3
- 4 Please clarify whether the Police Station will be built to Leeds environmental standards. | 5-4

Thanks very much,

Advocates for Mammoth

A handwritten signature in cursive script, appearing to read "Nancy A. Dugherly".



5. RESPONSES TO COMMENTS FROM THE ADVOCATES FOR MAMMOTH, DATED NOVEMBER 27, 2007.

5-1 Town Staff and the Town's Advisory Design Panel (ADP) have conducted a preliminary architectural design review of the proposed project and have concluded it generally complies with the applicable design guidelines. The building is designed to be less than 45 feet above natural grade, and would appear taller at the northern end due to a natural downgrade on-site slope. The roof design incorporates both flat and pitched roof forms providing variations in height. The tallest portion of the building would be the entry element with large windows located at the entrance of the building. The proposed project is subject to compliance with the Town's zoning standards and design guidelines, which would regulate the aesthetic characteristics of the proposed development.

5-2 While standard parking requirements based on land uses are provided in the Town of Mammoth Lakes Parking Code, a police station is not included as a standard use. Therefore, the person-trip analysis used for the trip generation was used to estimate parking demand. The maximum number of persons on-site at one time occurs on a weekday around 3:00 PM with 28 persons on-site. Dividing by a vehicle occupancy of 1.12 (the national average for work trips) results in a maximum of 25 vehicles on site at one time. Note this does not include the police vehicles. Currently, the Police Department has 18 vehicles.

A total of 51 parking spaces are proposed, including 21 underground spaces and 30 street level spaces. All of the underground garage spaces and six of the street level spaces would be used by employees and police vehicles, and the remaining 25 spaces would be used by the public. There are 51 proposed public and private parking spaces. The maximum number of on-site non-department vehicles is forecast to be 25. This would leave parking spaces for up to 26 police vehicles. As there are currently 18 police vehicles, this parking can be considered to be adequate.

5-3 Prior to conducting the traffic analysis, LSC reviewed AM versus PM conditions, and determined that only PM conditions needed to be analyzed, as any impacts occurring in the AM period would also be identified in the PM peak period, for the following reasons:

1. Hourly traffic volumes, recorded by the Town of Mammoth Lakes in 2007, indicate that the PM peak hour volumes near the high school (on Sierra Park Road north of Meridian) were on average 20 percent higher than the AM peak hour volumes.
2. The police station is forecast to generate slightly lower vehicle-trips in the AM peak hour (15) than in the PM peak hour (18). In addition, as Mammoth High School starts at 7:40 AM, the peak traffic from the school occurs between roughly 7:10 and 7:40 AM, while the morning peak for the police station traffic is between 8:00 AM and 9:00 AM. Therefore the police station project would have less of an impact during the AM school peak time than during the PM peak time.
3. At an unsignalized intersection, the driver delays and associated LOS is worst on the outbound movements (like the left-turn movement out of a driveway onto a street). All else being equal, the PM peak-hour (when there is a higher proportion



of traffic exiting a site) is a "worst case" condition compared to the AM peak-hour when there is a higher proportion of traffic inbound.

It can therefore be concluded that an analysis of AM peak school traffic period impacts would not result in the identification of any traffic impacts not also identified in the PM peak period included in the traffic analysis.

5-3 Although the Town has not finalized a decision to make the Police Station Leadership in Energy and Environmental Design (LEED) compatible, various energy efficiency elements would be reviewed during the design process of the proposed Mammoth Lakes Police Department building, including the following:

- Zoning and Controls: The connected electric lighting load design target would be less than 1.0 watt per square foot, thereby exceeding the Title 24-2007 requirements. Smart zoning and controls would be employed to further reduce energy usage.
- Orientation and Zoning: HVAC systems and equipment would be selected to maximize energy efficiency during the Town's extreme weather conditions. Walls, overhangs, and window placements would be located to maximize the overall efficiency of the building. High efficiency equipment would also be specified.
- Water Conservation: Plumbing fixtures with low water demand would be utilized to reduce the building's water use by up to 30 percent. Additionally, water-efficient irrigation systems would be designed and installed.
- Renewable Energy Sources: Several on-site renewable energy systems (i.e., geothermal, photovoltaic, and solar thermal) are available to minimize the proposed Mammoth Lakes Police Station's environmental footprint.