

DRAFT ENVIRONMENTAL IMPACT REPORT

MAMMOTH CROSSING PROJECT

Lead Agency:
Town of Mammoth Lakes
Community Development Department
PO Box 1609
Mammoth Lakes, CA 93546

**MAMMOTH CROSSING PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**

Submitted to:

Town of Mammoth Lakes
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I. INTRODUCTION AND SUMMARY

A. INTRODUCTION

The purpose of the Introduction/Summary is to provide the reader with a clear and simple description of the Project and its potential significant environmental impacts. Section 15123 of the *CEQA Guidelines* requires that the summary identify each significant effect and recommended mitigation measures and alternatives that would minimize or avoid potential significant impacts. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects. This section focuses on the major areas of the Project that are important to decision-makers and uses non-technical language to promote understanding. This summary is intended as an overview and should be used in conjunction with a thorough reading of the Draft Environmental Impact Report (“Draft EIR”). The text of this report, including figures, tables, and appendices, serve as the basis for this summary.

The subject of this Draft EIR is the proposed Mammoth Crossing Project (“Project”). A detailed description of the Project is contained in Section III, Project Description, of this Draft EIR.

Because the Project will require approval of certain discretionary actions by the Town of Mammoth Lakes (“Town”), the Project is subject to the California Environmental Quality Act (“CEQA”), for which the Town is the designated Lead Agency. The Town’s Planning Division administers the process by which environmental documents for private projects are prepared and reviewed. On the basis of these procedures, it was determined that the Project may have a significant effect on the environment and that an EIR should be prepared.

B. PURPOSE OF THE EIR

The Town has commissioned this EIR on the Project for the following purposes:

- To satisfy CEQA requirements.
- To inform the general public; the local community; and responsible, trustee, and state and federal agencies of the nature of the Project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and its reasonable and feasible alternatives.
- To enable the Town to consider the environmental consequences of approving the Project.
- For consideration by responsible agencies in issuing permits and approvals for the Project.

As described in Sections 15121 (a) and 15362 of the State *CEQA Guidelines*, an EIR is an informational document that will inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to a project. The purpose of this EIR, therefore, is to focus the discussion on those potential effects on the environment of the Project that the Lead Agency has determined are or may be significant. In addition, feasible mitigation measures are required, when applicable, that could reduce significant impacts to insignificant levels.

The Lead Agency is required to consider the information in the EIR, along with any other relevant information, in making its decision on the Project. Although the EIR does not determine the ultimate decision that will be made regarding implementation of the Project, CEQA requires the Town to consider the information in the EIR and make findings regarding each significant effect of the Project.

This Draft EIR was prepared in accordance with Section 15151 of the State *CEQA Guidelines*, which defines the standards for EIR adequacy:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR would summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.

C. PROPOSED PROJECT

The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public plazas. The Project is located within the *North Village Specific Plan* area, and includes a series of amendments to the *North Village Specific Plan* (“Specific Plan”) as originally adopted in 2000 and amended in 2005, as well as amendments to the *Town of Mammoth Lakes’ General Plan* (“General Plan”), which would be required to accommodate the Project’s proposed land uses.

The Project site, approximately 11 acres, consists of four locations, three of which would be developed with new uses as mentioned above. These three development sites, which include parcels at the northwest, southwest and southeast corners of the Main Street-Lake Mary Road/Minaret Road intersection, total approximately nine acres. In total, the Project would include the construction of up to 742 condominium/hotel rooms, up to approximately 69,150 square feet of hotel amenities and operations and general retail uses, 40,500 square feet of retail development, and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be

provided as part of the Project, some of which would be constructed off site. Proposed development at the three sites would involve multiple buildings ranging in height from one to approximately seven stories. The Project's fourth site, commonly known as the Tanavista project site, is approximately one acre and proposes no new development as part of this Project. The proposed development on the Tanavista project site consists of 45 residential units. The Town previously approved this development and a Mitigated Negative Declaration was adopted pursuant to CEQA. The Site 4 parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary and subsequently removed from the *Lodestar Master Plan* area.

D. AREAS OF KNOWN CONTROVERSIES

Section 15123 of the State *CEQA Guidelines* requires an EIR to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved. Environmental concerns raised at the EIR scoping meeting and in letters submitted to the Town of Mammoth Lakes in response to the Notice of Preparation ("NOP") of the EIR include:

- Traffic Analysis (including origin-destination pairings)
- Aesthetics, Building Height, Shade/Shadow, and Community Character
- Coordination and Compliance with the General Plan
- Biological Resources (including nesting birds and cavity nesters)
- Increased Noise (including noise events and additional people)
- Alternatives for Ingress/Egress
- Future Pedestrian/Bicycle Path
- Snow Removal and Storage
- Transit Services
- Consideration of Planning, Construction, and Operation Phases
- Economic Analysis
- Social Impact
- Land Use and Planning (including division of an established community)
- Hydrology and Water Quality (including drainage patterns, surface water runoff, and Low Impact Development)

E. ALTERNATIVES

This EIR considers a range of alternatives to the proposed Project to provide informed decision-making in accordance with Section 15126(d) of the State *CEQA Guidelines*. The alternatives analyzed in this EIR include: A) No Project No Build, B) No Public Parking C) On-site Affordable Housing, and D) Existing North Village Specific Plan Build-out Condominium Only. For further discussion of these alternatives, see Section VI of this Draft EIR. Based on the analysis in Section VI, Alternative A was selected as the Environmentally Superior Alternative. However, in accordance with State *CEQA Guidelines* Section 15126.6(e), if the Environmentally Superior Alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As such, Alternative D was selected as the environmentally superior alternative.

F. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table I-1 summarizes the various significant environmental impacts associated with the proposed Project; includes the mitigation measures recommended to reduce or avoid the significant environmental impacts; and identifies the level of impact significance after mitigation.

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>AESTHETICS (AES) <i>Impact AES-1 Public Views of Scenic Vistas</i> A significant impact would occur if the Project substantially blocks public views of a scenic vista. Section IV.B, Aesthetics, of this Draft EIR, provides a comparison of “before” views and “after” views of the Project site which are publically accessible and of scenic resources which are publically accessible from areas near the Project site. The Project would not obscure public views of scenic vistas from Views 1, 2, 3, 4, 5, 7, 9, and 10. However, views of the scenic Mammoth Knolls from Views 6 and 8 would be partially obscured. The Project would result in substantial changes to views of surrounding scenic Mammoth Knolls.</p>	<p>No mitigation measures are available to fully mitigate such impacts to public views or scenic vistas.</p>	<p>Significant and Unavoidable</p>
<p><i>Impact AES-5 Shading/Shadows</i> A significant shade/shadow impact could occur if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). A significant impact could also occur if the Project required an exception (variance) to the policies and regulations in the General Plan, Planning Code, or Uniform Building Code, and the exception causes a fundamental conflict with policies and regulations in the General Plan, Planning Code, and Uniform Building Code addressing the provision of adequate light related to appropriate uses. In addition, the shading of roadways for extended periods of time could lead to hazardous roadway conditions such as black ice.</p> <p><i>Winter Solstice</i> The Project’s winter solstice shadows would cast onto a portion of the adjacent residential land use north of Project Site 1 in the morning and throughout the afternoon. Winter solstice shadows would cast onto portions of Lake Mary Road, Main Street and Minaret Street for more than three hours. Shading of these roadways for extended periods of time could lead to hazardous roadway conditions such as black ice.</p>	<p><i>Mitigation Measure AES-5 Shading/Shadows</i> The Project Applicant shall implement a snow plowing and cinderling plan during the three worst-case shadow months of the year at any portion of a pedestrian or vehicular travel-way that receives less than two hours of mid-day sun for more than a week. The Community Development Director shall review the methodology and effectiveness of the plan during its implementation. If it is determined by the Town that the plan does not adequately reduce hazards resulting from shadows (i.e. black ice), the Town shall require the Project Applicant to install heat traced pavement at any portion of a pedestrian or vehicular travel-way that receives less than two hours of mid-day sun for more than a week.</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact AES-6 Temporary Construction</i></p> <p>The Project's three sites are surrounded by existing development and or disturbed areas thus, construction activities would be visible from the surrounding land uses, including adjacent residential uses. During the construction period, there would be temporary construction fencing to screen most activities from surrounding uses. However, it is likely that construction vehicles and activities would still be visible. Additionally, excavation and demolition activities are likely to require approximately 320 daily truck trips (inbound and outbound), resulting in a potentially significant aesthetic impact, especially along Main Street (SR 203) and Minaret Road. Although implementation of Mitigation Measure AES-6 would reduce impacts resulting from construction activities, surrounding residential areas would be exposed to the visually-related construction impacts for an extended period of time.</p>	<p><i>Mitigation Measure AES-6 Temporary Construction</i></p> <p>Construction equipment staging areas shall use appropriate screening (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material, when feasible. Staging locations shall be indicated on Final Development Plans and Grading Plans.</p>	<p>Significant and Unavoidable</p>
<p><i>Impact AES-7 Cumulative Impacts</i></p> <p>Related projects that are close enough to the Project site to have a direct cumulative visual quality impact in combination with the Project include related project numbers 5, 6, 8, 33, 12, 19 and 27 north of Lake Mary Road and Main Street, and 15, 22, and 36 south of Lake Mary Road and Main Street in the related projects list. Development of the Project in association with these related projects would result in a gradual infill of existing development in this sector of the Town, which would result in changes in visual character in the area. Therefore, the Project combined with the related projects would result in a cumulative impact to views and the visual character of the Town. As a result, cumulative impacts with respect to scenic views and existing visual character would be considered significant and the Project's incremental contribution to cumulative impacts would be significant and unavoidable.</p>	<p>There are no mitigation measures available to reduce the significant impacts to public views of scenic vistas.</p> <p>Implementation of Mitigation Measure AES-6 Temporary Construction would not fully reduce Project-specific impacts temporary aesthetic construction impacts.</p>	<p>Significant and Unavoidable</p>
<p>AIR QUALITY (AQ)</p>		
<p><i>Impact AQ-1 Construction Impacts</i></p> <p>Development of the Project would result in the generation of pollutant emissions. However, the Great Basin Unified Air Pollution Control District does not currently have thresholds for determining the level of significance for air emissions. In the absence of such thresholds, any emissions that may result in a</p>	<p><i>Mitigation Measure AQ-1 Construction Impacts</i></p> <p>In compliance with Rule 401 and 402, the Project Applicant shall require that the following practices be implemented by including them in the contractor construction documents to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the Project construction phases:</p>	<p>Significant and Unavoidable</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>violation of an air quality standard or contribute substantially to an existing air quality violation will be considered significant. Since respirable particulate matter (PM₁₀) is classified as non-attainment, any PM₁₀ emissions will contribute substantially to an existing air quality violation. Therefore, unless PM₁₀ emissions are reduced by implementation of feasible control measures, impacts caused by these emissions would be considered significant. As a result, in the absence of mitigation measures, construction activities at the Project site would result in potentially <i>significant</i> air quality impacts.</p> <p>Even with implementation of the recommended mitigation measures, development of the Project would continue to result in the generation of pollutant emissions. In addition, PM₁₀ emissions cannot be reduced to zero with the implementation of the recommended mitigation measures.</p>	<p>a. Water all construction areas at least twice daily; water trucks will be filled locally after the contractor makes water acquisition agreements and obtains any required permits.</p> <p>b. Cover all trucks hauling soil, sand, and other loose materials;</p> <p>c. Apply clean gravel, water, or non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites;</p> <p>d. Remove excess soils from paved access roads, parking areas and staging areas at construction sites;</p> <p>e. Sweep streets daily (with mechanical sweepers) if visible soil material is carried onto adjacent public streets;</p> <p>f. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more);</p> <p>g. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.);</p> <p>h. Install gravel-bags, cobble entries, or other Best Management Practices (BMPs) and erosion control measures to prevent silt runoff to public roadways;</p> <p>i. Replant vegetation in disturbed areas as soon as possible;</p> <p>j. Install wheel washers for all exiting trucks or wash off the tires or tracks of all trucks and equipment leaving the construction site;</p> <p>k. Suspend excavation and grading activities when wind (as instantaneous gusts) exceeds 25 miles per hour (mph) and when sustained winds exceed 25 mph increase the frequency of watering from twice daily, as described in Mitigation Measure AQ-1a above, to three to four times a day;</p> <p>l. The construction fleet will meet the terms set forth in the CARB Proposed Regulation for in-use Off Road Diesel Vehicles, paragraph (d)(3) Idling. The proposed regulation implementation date is May 1, 2008.</p> <p>m. Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use;</p> <p>n. All equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications;</p> <p>o. When feasible, alternative fueled or electrical construction</p>	

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact AQ-2 Operational Emissions</i></p> <p>Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project site after occupation. Stationary area source emissions would be generated by the consumption of propane for space and water heating devices, cooking appliances, and fireplaces, the operation of landscape maintenance equipment, the use of consumer products, and the application of architectural coatings (paints). Mobile emissions would be generated by the motor vehicles traveling to and from the Project site.</p> <p>Since PM₁₀ is classified as non-attainment, any PM₁₀ emissions will contribute substantially to an existing air quality violation. Therefore, unless PM₁₀ emissions are reduced by implementation of feasible control measures, impacts caused by these emissions would be considered significant. As a result, in the absence of the mitigation measures, operation activities at the Project site would result in potentially significant air quality impacts.</p>	<p>equipment shall be used for the Project site;</p> <p>p. Use the minimum practical engine size for construction equipment;</p> <p>q. Gasoline-powered equipment shall be equipped with catalytic converters, where feasible; and</p> <p>r. Incorporate BMP's during construction of the Project site.</p> <p><i>Mitigation Measure AQ-2 Operational Emissions</i></p> <p>The Project Applicant shall require the following implementation measures to reduce PM₁₀ operational emissions resulting from the Project:</p> <p>a. The Project shall include a transportation demand management program to reduce overall vehicle miles traveled ("VMTs"), in order to demonstrate compliance with the federal PM₁₀ standard of 150 µg/m³. The program shall include, but not be limited to, circulation system improvements, shuttles to and from parking areas, and the location of facilities to encourage pedestrian circulation;</p> <p>b. The Project shall be linked to existing developed areas through existing road networks, public transit systems, open space systems, and bicycle and pedestrian systems;</p> <p>c. The Project shall implement trip reduction measures particularly during PM peak traffic hours to disperse trips between parking areas and mountain portals to and from the ski area;</p> <p>d. Residential condominium units shall enter into a transit fee agreement with the Town consistent with the Town's established Transit Fee Agreement Program; and</p> <p>e. A maximum of one solid fuel burning appliance may be installed or only one solid fuel burning appliance may be allowed in each hotel. No other solid fuel burning appliances shall be installed on the Project site.</p> <p>In addition, the Project Applicant will consider the use of geothermal heating for both heating and snow removal to reduce PM₁₀ emissions resulting from crushed cinder and dirt.</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact AQ-5 Cumulative Impacts</i></p> <p><i>Construction Impact</i> According to the Town's General Plan Update EIR, the increases in PM₁₀ emissions associated with both construction and operation of the proposed and related projects would be considered cumulatively considerable even without development of the Project. Since the Project's construction impact with regard to PM₁₀ emissions would remain significant and unavoidable, the Project's cumulative construction impact on air quality would also be considered significant and unavoidable.</p> <p><i>Operational Impact</i> The Project is expected to generate 6,450 Vehicle Miles Traveled (VMT) per day upon build-out (see Appendix I of this Draft EIR). Cumulative VMT for 2009 without the Project is expected to be 110,073 VMT per day. Therefore, total cumulative estimated VMT upon Project build-out is 116,523. This number exceeds the limit of 106,600 VMT set by the Town's Air Quality Management Plan. Therefore, without mitigation measures, cumulative operational impacts for the Project would be significant.</p> <p>BIOLOGICAL RESOURCES (BIO)</p> <p><i>Impact BIO-1 Special-Status Species</i> Eight special-status wildlife species, including four bat and four bird species, have a moderate potential to occur within the Project site; these species and/or their potential habitat may be impacted by the Project. No special-status plants are present on site.</p> <p><i>Bats</i> Removal of roost habitat during the bat hibernation or maternity season has potential to result in harm, death, displacement and/or disruption of bats and/or nursery colony roosts; this impact may be considered significant under CEQA.</p> <p><i>Birds</i> Construction activities including vegetation removal, noise and vibration have a potential to result in direct (i.e., death or physical harm) and indirect (i.e., nest abandonment) significant impacts to</p>	<p><i>Construction Impact</i> There are no mitigation measures available to reduce the Project's significant cumulative construction impact on air quality.</p> <p><i>Operational Impact</i> Mitigation Measure AQ-2 (Operational Impacts) would also reduce the cumulative emissions associated with operation of the proposed and related projects to a less-than-significant level.</p>	<p>Significant and Unavoidable (Construction Impact) Less Than Significant (Operational Impact)</p>
<p><i>Mitigation Measure BIO-1 Special Status Species</i> <i>Mitigation Measure BIO-1a</i> To avoid impacting breeding or hibernating bats, tree and snag removal shall occur in September and October, after the bat breeding season and before the bat hibernation season. If snag and tree removal is to take place outside of this time frame, a pre-construction bat survey should be conducted. If no roosting bats are found during the survey, no further mitigation would be required. If bats are detected, a 50-foot buffer exclusion zone should be established around each occupied snag or tree until the roosting activities have ceased.</p> <p><i>Mitigation Measure BIO-1b</i> To avoid impacting nesting birds and/or raptors, <u>one</u> of the following must be implemented:</p> <ul style="list-style-type: none"> • Conduct vegetation removal and other ground disturbance activities associated with construction during September 		<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>nesting birds; these impacts would be considered significant.</p>	<p>through March, when birds are not nesting;</p> <p>-OR-</p> <ul style="list-style-type: none"> Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction raptor survey no more than 30 days prior to initiation of grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the Project site). If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFG and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 25 feet is required by CDFG for songbird nests, and 200 to 500 feet for raptor nests, depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel restricted from the area. A survey report by the qualified biologist verifying that the young have fledged shall be submitted to the Town prior to initiation of grading in the nest-setback zone. 	
<p><i>Impact BIO-4 Conformance with Town Policies and Ordinances</i></p> <p>The proposed development would conflict with the intent of some policies of the Town's Municipal Code regarding tree removal. The Jeffrey pine-fir forest plant community present on site contains several trees that would meet the minimum size (six inches in diameter) to require approval from the Town prior to removal. Prior to the issuance of building permits by the Town, the Project Applicant shall submit a Vegetative Hazard Management Plan ("VHMP") for approval by the Mammoth Lakes Fire Protection District (MLFPD). In compliance with MLFPD requirements, implementation of the VHMP may require tree trimming and/or the removal of additional trees. Although not documented in the</p>	<p><i>Mitigation Measure BIO-4 Conformance with Town Policies and Ordinances</i></p> <p>Prior to the removal of any trees greater than six inches in diameter, a final analysis of the number and value of trees removed shall be prepared by a licensed forester or certified arborist. Prior to removal of any trees greater than six inches in diameter a tree removal permit must be approved by the Town. Said tree replacement shall be within the Project area, or off site; as may be approved by the Community Development Director.</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>Town's Municipal Code (Chapter 17.16.050), it is the Town's intent not to protect all live trees but, native trees over six inches in diameter. The removal of live trees over six inches in diameter associated with the proposed Project and implementation of the VHMP may result in significant impacts.</p> <p>CULTURAL RESOURCES (CULT)</p> <p><i>Impact CULT-2 Impacts to Unknown Cultural Resources</i></p> <p>Seven cultural resources have been previously recorded within a one-half mile radius of the Project. No cultural resources have been previously recorded within the Project limits, nor were any prehistoric or historic archaeological resources identified within the Project area during the intensive-level pedestrian survey. In addition, all properties within the Project area were found to be ineligible for listing in the California Register, and at this time would not qualify for National Register of Historic Places listing; therefore, none are a historical resource under CEQA.</p> <p>Based on the paucity of previously recorded cultural resources in the literature search area and lack of identified prehistoric and historic archaeological resources within the Project area the Project is not sensitive for prehistoric and historic archaeological resources. While ground-disturbing construction associated with the Project has the potential to result in significant impacts to unrecorded buried archaeological deposits it is unlikely that any such deposits occur.</p>	<p><i>Mitigation Measure CULT-2c Impacts to Unknown Cultural Resources</i></p> <p><i>Mitigation Measure CULT-2a</i></p> <p>If previously unrecorded archaeological materials are identified during construction gradings, work in the area should be temporarily halted or redirected and a qualified archaeologist meeting the Secretary of the Interior's standards for Archaeology and a Native American monitor shall be notified to evaluate the cultural find. If the archeologist determines that the site should be capped, the archeologist and Native American Monitors shall be on site during any capping activities. The archeologist and Native American Monitors shall be compensated for their services by the Project Applicant. The procedure to select and designate the archeologist and Native American Monitors shall be selected and designated as described in the Mitigation Monitoring Program as identified in the Final EIR.</p> <p><i>Mitigation Measure CULT-2b</i></p> <p>A qualified archaeologist and Native American monitor as selected and as needed per requirements identified in Mitigation Measure CULT-2a shall monitor ground-disturbing. The monitors shall be supplied with maps and site records for the previously recorded cultural resources within the Project site. The monitors shall prepare daily monitoring logs recording the type of work monitored, soil conditions, discoveries, and general observations.</p> <p><i>Mitigation Measure CULT-2c</i></p> <p>Previously unknown cultural resources identified during Project construction shall be protected through temporary redirection of work and possibly other methods such as fencing until formally evaluated for significance under CEQA. In the event that previously unrecorded cultural resources are exposed during construction, the archeologist and Native American monitors as selected and as needed per requirements</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
	<p>identified in Mitigation Measure CULT-2a shall be empowered to temporarily halt construction in the immediate vicinity of the discovery while it is documented and evaluated for significance. The monitors shall provide consultation when resources are found to determine how the resources shall be handled. If the selected Native American monitor and the applicant cannot agree upon the proper treatment, the qualified archeologist monitoring the ground disturbing activities shall make the decision. Construction activities may continue in other areas. If the discovery is evaluated as significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate Project-related impacts to a less-than-significant level if preservation is not possible.</p> <p><i>Mitigation Measure CULT-2d</i> Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Mono County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, re-inter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.</p> <p><i>Mitigation Measure CULT-2e</i> A monitoring report shall be prepared upon completion of construction monitoring, summarizing the results of the monitoring effort by the</p>	

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>qualified archaeological monitor as selected and as needed per requirements in Mitigation Measure CULT-2a. Site records for any newly recorded or updated cultural resources shall be appended to the monitoring report.</p> <p><i>Mitigation Measure CULT-2f</i> Artifacts or samples collected during the course of construction monitoring and any testing or data recovery associated with newly discovered resources by the qualified archaeological monitor and Native American monitor as selected and as needed per requirements identified in Mitigation Measure CULT-2a shall be curated in perpetuity in an appropriate facility upon completion of analysis and processing.</p>	<p><i>Mitigation Measure GEO-2</i> Strong Seismic Ground Shaking <i>Mitigation Measure GEO-2a</i> Prior to issuance of building permits and grading activities, a design level geotechnical report shall be prepared for each of the Project's three development sites and all recommendations in the report shall be adhered to. The design-level geotechnical report shall include foundation design criteria as well as earthwork and grading recommendations.</p> <p><i>Mitigation Measure GEO-2b</i> Implement all recommendations contained within these site-specific geotechnical reports, including those pertaining to site preparation, excavation, fill placement and compaction; foundations; concrete slabs-on-grade; pavement design; lateral earth pressures and resistance; and surface drainage control.</p> <p><i>Mitigation Measure GEO-2c</i> The final grading, drainage, and foundation plans and specifications shall be prepared and/or reviewed and approved by a Registered Geotechnical Engineer and Registered Engineering Geologist. In addition, upon completion of construction activities, the Project Applicant shall provide a final statement indicating whether the work was performed in accordance with Project plans and specifications and with the recommendations of the Registered Geotechnical Engineer and Registered Engineering Geologist.</p>	<p>Less Than Significant</p>
<p>GEOLOGY AND SOILS (GEO)</p>		
<p><i>Impact GEO-2 Strong Seismic Ground Shaking</i> The California Division of Mines and Geology (CDMG) has included the Town within Seismic Zone III in the Urban Geology Master Plan with an expected modified Mercalli Rating of "IX" or "X" at maximum earthquake intensities. [The "IX" Mercalli rating indicates that heavy damage to unreinforced structures would result and some structures would collapse. The "X" rating indicates that masonry structures would be destroyed, some well built wooden structures would be destroyed, and public facilities would be damaged.]</p> <p>The Project site is located in a Seismic Zone 4 based on 1997 Uniform Building Code (UBC) and 2001 California Building Code (CBC). Chapter 15 of the Town Municipal Code requires that all structures within the boundaries of the Town shall be designed to the requirements of Seismic Zone 4 as defined in UBC/CBC. Conformance with current UBC/CBC requirements, as well as the Town's seismic design requirements would most likely reduce the potential for structures on the Project site to sustain damage during an earthquake event. However, Project impacts related to ground shaking would still be considered significant.</p>		

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact GEO-5 Soil Erosion/Loss of Topsoil</i></p> <p>The Project site would require grading and earthwork and would be subject to soil erosion and loss of topsoil. Erosion and loss of topsoil is possible surrounding the structures if left unprotected during the snowmelt season. Without proper implementation of erosion control measures during construction and operation of the Project, the sites could sustain soil erosion and loss of topsoil. This would be considered a significant impact.</p>	<p><i>Mitigation Measure GEO-5 Soil Erosion/Loss of Topsoil</i></p> <p>The following measures shall be implemented to prevent soil erosion and loss of topsoil:</p> <ol style="list-style-type: none"> Storm Water Pollution Prevention Plan (SWPPP) shall be prepared with the grading plans to fulfill regulatory requirements. Permanent erosion control measures shall be placed on all graded slopes. No graded areas shall be left unstabilized between October 15th and April 15th. Permanent erosion control measures for construction identified in the Project's Storm Water Pollution Prevention Plan (SWPPP) per the requirements of the California State Water Resources Control Board (SWRCB) adopted in accordance with the General Construction Activity Storm Water Permit (General Permit) shall be implemented. Finish grading for all building areas shall allow for all drainage water from the building area to drain away from building foundations (two percent minimum grade on soil or sod for a distance of five feet). Ponding of water shall not be permitted. The required implementation of the Best Management Practices (BMPs) identified in the Project's SWPPP would ensure that Project construction activities within the Project area would not cause substantial erosion on or off site. Additionally, for post construction, erosion control measures designed to minimize soil loss from exposed areas of the Project's three sites shall be determined in consultation with the Town's Department of Public Works. 	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact GEO-6 Volcanic Activity</i></p> <p>A volcanic eruption could occur somewhere along Mono-Inyo Craters volcanic chain producing pyroclastic flow and surges, as well as volcanic ash and pumice fallout, which could significantly impact the subject site. The odds, however, of such an eruption are roughly one in a thousand in a given year. Although risk is present throughout the Town and surrounding areas, Project impacts related to volcanic activity would be significant.</p>	<p><i>Mitigation Measure GEO-6 Volcanic Activity</i></p> <p>The Project Applicant shall prepare an emergency evacuation plan in consultation with the Town in order to provide for the orderly evacuation of the Project site in case the potential for volcanic hazards increases and residents need to vacate the Project site.</p>	<p>Less Than Significant</p>
<p>HAZARDS AND HAZARDOUS MATERIALS (HAZ)</p>		
<p><i>Impact HAZ-1 Upset and Accidental Release of Hazardous Materials</i></p> <p>Hazardous materials and risk of upset conditions are largely site-specific. The Project would require demolition, renovation or relocation of existing structures and removal of paved surface areas on each of the three sites. Given the age of the buildings, there exists the potential for existing construction materials to contain either Asbestos-Containing Materials (ACM) or Lead-Based Paint (LBP). As the existing buildings in the Project area have the potential to contain ACMs and/or LBPs, the Project could potentially result in temporary, significant impacts during demolition, grading and the redevelopment of the Project area.</p>	<p><i>Mitigation Measure HAZ-1 Upset and Accidental Release of Hazardous Materials</i></p> <p>The Project shall comply with California OSHA Construction Safety Orders, California Code of Regulations, Title 8, Section 1532.1 and with the California Health and Safety Code, Division 20, Chapter 6.5 for the evaluation, handling and transport of materials containing hazardous substances. Should the Town require it, prior to demolition of on-site buildings and grading activities, a Phase I Environmental Site Assessment shall be conducted and all recommendations in the assessment shall be adhered to. It is anticipated that this further assessment/investigation will determine if any additional potential environmental liabilities are present in the Project area, and the assessment recommendations will assure a reduction of potential impacts to a less-than-significant level.</p> <p><i>Mitigation Measure HAZ-1b</i></p> <p>A licensed asbestos abatement consultant shall be retained to conduct a pre-construction assessment for asbestos and asbestos containing materials. Prior to the issuance of demolition or building relocation permits, the applicant shall provide a letter to the Community Development Department from the qualified asbestos abatement consultant that no ACMs are present in on-site buildings. If ACMs are found to be present, they will need to be abated in compliance with all State and federal rules and regulations (including, but not limited to California Health and Safety Code, Division 20, Chapter 6.5), consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), Chapter 29</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>HYDROLOGY AND WATER QUALITY (HYD) <i>Impact HYD-1 Water Quality Standards</i> A significant impact may occur if a project discharges water that does not meet the quality standards of agencies which regulate surface water quality (in this case, the Lahontan RWQCB) or if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB.</p> <p><i>Operation-Related Impacts</i> Activities associated with operation of the Project would generate</p>	<p>Code of Federal Regulations (CFR), prior to demolition of any buildings in the Project area. The Project Applicant shall be required to comply with all applicable State and federal policies and procedures for removal of any ACM containing materials determined to be present within any structures on the Project area. Adherence to procedures outlined in the laws will assure that there will be a less-than-significant impact from asbestos due to the demolition or removal of buildings or structures.</p> <p><i>Mitigation Measure HAZ-1c</i> A licensed lead-based paint abatement consultant shall be retained to conduct a pre-construction assessment of lead based paint and lead-based paint containing materials. Prior to the issuance of the demolition or building removal permits, the applicant shall provide a letter to the Community Development Department from a qualified lead-based paint abatement consultant that no lead paint is present in on-site buildings. If lead-based paint is found to be present on buildings to be demolished or removed, it shall be abated in compliance with applicable State and federal rules and regulations governing lead paint abatement, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), Chapter 29 Code of Federal Regulations, prior to demolition of any buildings in the Project area. The Project Applicant shall be required to comply with all applicable State and federal policies and procedures for removal of any LBP containing materials determined to be present within any structures on the Project site. Adherence to procedures outlined in the laws will assure that there will be a less-than-significant impact from lead-based paint due to the demolition or removal of buildings or structures.</p> <p><i>Mitigation Measure HYD-1 Water Quality Standards</i> In consultation with the Town, the Project Applicant shall identify and implement a suite of stormwater quality BMPs designed to address the most likely sources of stormwater pollutants resulting from operation of the proposed development projects within the proposed Project area. Pollutant sources and pathways to be addressed by these BMPs include, but are not necessarily limited to, parking lots, maintenance areas, trash storage locations, rooftops, interior public and private roadways, and storm drain inlets. The design and location of these BMPs will be</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>substances that could degrade the quality of water runoff. However, even with implementation of required BMPs, operation of the Project could generate substances that could degrade the quality of water runoff resulting in a potentially <i>significant</i> impact to the receiving water quality in Mammoth Creek.</p>	<p>subject to review and comment by the Town. Implementation of these BMPs shall be assured by the Community Development Director and Town Engineer prior to the issuance of Grading or Building Permits.</p>	
<p><i>Impact HYD-2 Groundwater Depletion or Recharge</i></p>	<p><i>Mitigation Measure HYD-2 Groundwater Depletion or Recharge</i></p>	
<p>A significant impact may occur if a project would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.</p>	<p><i>Mitigation Measure HYD-2a</i> All underground structures shall be designed with exterior wall drain board to a footing drain system as well as under-slab subdrains. Crawlspace shall be protected with proper ventilation and subdrains. The system shall be designed such that subdrains shall be designed with outlet systems that have maximum water surface elevations lower than the bottom of the subdrains to ensure that subdrains would not be inundated with stormwater when retention basins reach capacity. Subdrain design shall be based on final Project design and shall be adequately sized so that retention basin capacity is maintained for stormwater retention purposes.</p>	<p>Less Than Significant</p>
<p><i>Operation-Related Impacts</i></p>		
<p>Recharge of regional groundwater is dependent upon annual precipitation and groundwater is a key source of water supply for the Town. Because development of the Project would increase the amount of impervious surface, groundwater recharge impacts could be potentially significant.</p>		
<p>Although generalized static groundwater level is approximately 100-feet below the ground surface, due to typical heavy snowpack melting in the spring, nearly all sites in Mammoth Lakes are subject to seasonal high groundwater and structures need to be protected from high groundwater levels. All Project structures, including but not limited to underground structures, parking garages, basements, under-slabs, and crawl spaces would require subdrains, which would drain to retention basins. Nonetheless, operation impacts pertaining to groundwater intrusion to Project structures would be potentially significant.</p>	<p><i>Mitigation Measure HYD-2b</i> In consultation with the Town and in compliance with the Lahontan RW/QCB, and subject to the Town approval, the Project Applicant shall identify and install infiltration BMPs to offset the loss of pervious surface as a result of Project development. Infiltration BMPs would be selected based on Final Development Plans and design considerations in accordance with the methodology contained in the California Stormwater Quality Association's New Development and Redevelopment Handbook. Infiltration BMPs that would be considered could include infiltration trenches, pervious pavements, vegetated buffer strips or swales, and bioretention. Final selection would be dependent upon site characteristics and Final Development Plans and design considerations.</p>	
<p><i>Impact HYD-4 Drainage System Capacity</i></p>	<p><i>Mitigation Measure HYD-4 Drainage System Capacity</i></p>	
<p>Overall, the Project would create 266,660 square feet of impervious surfaces and would decrease the impervious surface on Site 1 by approximately 8 percent, and increase the impervious surface for Site 2 and 3 by 44 and 29 percent, respectively. After construction of the Project, proposed conditions would be very similar to the existing conditions. Flows would be conveyed through the sites to</p>	<p>The Project Applicant shall design and construct improvements identified in the 2005 Storm Drain Master Plan to the extent necessary, as determined by the Town's Public Works Department, to increase the capacity of the Town's drainage facilities including the downstream Sierra Valley Site if no such improvements have been made by the time</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>existing and proposed drainage facilities and then allowed to continue as close to historic conditions as practicable. The Project would have no significant impacts on the neighboring properties. However, impacts to the Town's storm drain facilities further downstream (i.e., the neighborhood of the Sierra Valley Sites), which according to the Town are at capacity and therefore any increase in runoff as a result of development on Site 2 and Site 3 would be potentially significant. As stated above, development on Site 1 would have net increase in impervious surface; as such no impacts to Town drainage facilities would occur from Site 1.</p>	<p>occupancy of Site 2 and Site 3 of the Project occurs.</p> <p><i>Mitigation Measure HYD-4b Drainage System Capacity</i> In consultation with the Town and Lahontan RWQCB, and subject to Town approval, the Project Applicant shall identify and implement a suite of storm drainage facilities designed to safely capture, treat, and convey runoff from the required design storms. In addition, a detailed set of maintenance procedures necessary to assure that these storm drain facilities continue to work as designed shall be established and approved by the Town, in consultation with the Lahontan RWQCB. Particular items requiring maintenance include, but are not limited to, cleaning of gates, removal of foreign materials from storm drainage pipes, maintenance as necessary for outlet facilities and retention basins, and repairs as necessary to damaged facilities.</p>	
<p>NOISE</p>		
<p><i>Impact NOISE-1 Exposure of Persons to Excessive Noise Levels</i></p> <p>Construction of the Project would require the use of heavy equipment for site grading and excavation, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.</p> <p>While the Project would comply with the construction hours of the Town Municipal Code, construction noise levels experienced by nearby off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed for mobile and stationary construction equipment under the Town Noise Ordinance. As such, potentially significant temporary construction noise impacts could result.</p>	<p><i>Mitigation Measure NOISE-1 Exposure of Persons to Excessive Noise Levels</i></p> <p><i>Mitigation Measure NOISE-1a</i> Project developers shall require by contract specifications that the following construction best management practices ("BMPs") be implemented by contractors to reduce construction noise levels:</p> <ol style="list-style-type: none"> Provide advance notification of construction to the immediate surrounding land uses around a development site. Ensure that construction equipment is properly muffled according to industry standards. Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible. Schedule high noise-producing activities between the hours of 8 a.m. and 5 p.m. to minimize disruption on sensitive uses. Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets. <p><i>Mitigation Measure NOISE-1b</i> Project developers shall require by contract specifications that construction staging areas within the Project site would be located as far away from noise-sensitive sites as feasible.</p>	<p>Significant and Unavoidable (Temporary Construction)</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact NOISE-4 Temporary Increases in Noise (Construction)</i> Construction activities associated with the Project, particularly the use of heavy machinery, would generate temporary and intermittent ambient noise level increases in the project vicinity. While the Project would comply with the construction hours of the Town Municipal Code, construction noise levels experienced by off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed for mobile and stationary construction equipment under the Town Noise Ordinance. As such, a significant construction noise impact could result.</p>	<p>Implementation of Mitigation Measures NOISE-1a and NOISE-1b as discussed under Impact NOISE-1, (Exposure of Persons to Excessive Noise Levels) would reduce noise levels from construction activity; however temporary construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in significant and unavoidable temporary construction noise impacts.</p>	<p>Significant and Unavoidable (Temporary Construction)</p>
<p><i>Impact NOISE-5 Cumulative Noise</i> While each of the related projects would be subject to Section 15.08.020 of the Town Municipal Code, which limits the hours of allowable construction activities, and to Section 8.16.090 of the Town Noise Ordinance, which establishes noise standards for mobile and stationary construction equipment, cumulative construction noise levels experienced by nearby off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed. As such, potentially significant cumulative construction noise impacts could result. Implementation of Mitigation Measures NOISE-1a and NOISE-1b as discussed under Impact NOISE-1, (Exposure of Persons to Excessive Noise Levels) would reduce noise levels from construction activity associated with the Project and related projects would be subject to similar mitigation measures; however cumulative construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in significant and unavoidable cumulative construction noise impacts.</p>	<p>Implementation of Mitigation Measures NOISE-1a and NOISE-1b as discussed under Impact NOISE-1, (Exposure of Persons to Excessive Noise Levels) would reduce noise levels from construction activity associated with the Project and related projects would be subject to similar mitigation measures; however cumulative construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in significant and unavoidable cumulative construction noise impacts.</p>	<p>Significant and Unavoidable (Temporary Construction)</p>
<p>PUBLIC SERVICES (PS)</p>		
<p><i>Impact PS-1 Police Services</i> The Mammoth Lakes Police Department's (MLPD) level of service is impacted by the Town's permanent resident population as well as the Persons At One Time (PAOT) population. The Project would increase the number of persons and level of activity on the Project site during both peak and off-peak tourism periods, and would therefore result in increased demands for police services including vehicles, personnel, and equipment. Additionally, the current</p>	<p><i>Mitigation Measure PS-1 Police Services</i> <i>Mitigation Measure PS-1a</i> During construction the Project shall implement crime prevention features subject to the approval of the MLPD. Crime prevention features may include on-site security staff, construction security fencing, control to proposed parking areas, security lighting, and landscape planning and minimization of "dead-space" to eliminate areas of concealment.</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>MLPD facility would not be able to accommodate additional personnel. Although the MLPD is currently in the process of building a new police facility that will be available in the next two to three years, it would not be able to adequately meet Project needs until that time. The new MLPD facility has been approved by the Town, but funding has not been fully secured and it is not under construction at this time. Therefore impacts to police protection impacts are considered to be significant.</p>	<p><i>Mitigation Measure PS-1b</i> During the operation of the Project, crime prevention features shall be implemented in conjunction with the non-residential components associated with the Project development as approved by the MLPD. Crime prevention features shall include trained security personnel on site for bars and restaurants that cater to late night crowds and to patrol the non-residential components between the hours of between 6 p.m. to 2 a.m., if deemed necessary by the MLPD. All trained security personnel associated with the Project shall work in conjunction with the MLPD law enforcement to solve crimes and crime problems as requested by the MLPD. Additional MLPD-approved crime prevention features may be requested as the final uses associate with the Projects visitor-serving amenities are established.</p>	
<p>TRAFFIC AND CIRCULATION (TRANS)</p>		
<p><i>Impact TRANS-2 Cumulative Plus Project Intersection LOS</i> All of the study area intersections are forecast with improvements to operate within or below the Town's threshold of significance in the cumulative plus Project condition with the exception of Center Street/Main Street. This location is also deficient in the without Project condition. Therefore, impacts are considered to be significant.</p>	<p><i>Mitigation Measure TRANS-2 Cumulative Plus Project Intersection LOS</i> Evaluation of intersection LOS shows that the addition of the Project traffic to the cumulative traffic would contribute to the cumulative deficiency and therefore significantly impact the Center Street/Main Street intersection in the cumulative plus Project scenario, according to the Town's criteria. The following mitigation would be required for the cumulative plus Project condition to mitigate the intersection to LOS D or better: a. Center Street/Main Street. Payment of Development Impact Fees ("DIFs"), a portion of which is applicable to installation of a traffic signal at Center Street/Main Street intersection is consistent with the Town's General Plan recommended mitigation measures. When the Center Street/Main Street traffic signal is installed, the planned signal at the Post Office would be removed, and left turns onto Main Street from both directions would be prohibited. Traffic requiring this movement has been reassigned to the Center Street/Main Street intersection. All costs for the implementation of this improvement should be eligible for a credit to DIFs. This mitigation would be implemented as part of a traffic mitigation program that would be funded by the DIFs. b. In light of the unique trip generation applied to the hotel units, referenced from observed vehicular count data (inbound and</p>	<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p>UTILITIES (UTIL)</p> <p><i>Impact UTIL-4 Cumulative Wastewater Infrastructure</i></p> <p>MCWD has identified deficiencies in the collection system that would be exacerbated by the Project and the related projects. MCWD conducted a <i>Connection Fee Study</i> in 2005 to evaluate the need for future wastewater facilities and the costs associate with the construction of these facilities. Through the <i>Connection Fee Study</i>, MCWD identified three wastewater collection system upgrades needed to accommodate future growth in the Town. The timeline of construction of these projects are subject to availability of connection fees that are collected and the schedule is subject to change. Therefore, because these future wastewater infrastructure projects are not complete at present the Project's contribution to overall wastewater infrastructure within the Town would be cumulatively considerable, and cumulative wastewater infrastructure impacts would be significant.</p>	<p>outbound) at the Intrawest North Village Lodges (i.e., Grand Sierra, White Mountain, and Lincoln House) parking garage on February 9, 2008, it is recommended that a monitoring program be implemented on an annual (typical winter Saturday) basis to document effective hotel unit trip generation.</p> <p>If hotel unit trip generation is significantly higher than documented in the traffic impact analysis, the Project may be required to provide additional buses/shuttles and/or a bus stop on the easterly side of Minaret Road at the new road also known as the 7B Road (for a future transit route).</p>	
<p><i>Mitigation Measure UTIL-4 Cumulative Wastewater Infrastructure</i></p> <p>The Project Applicant shall coordinate with MCWD to design and construct an equivalent sewer upgrade project to increase the capacity of sewer lines along Manzanita Road between Dorrance Road and Center Street if the Shady Rest Tract project is not complete by occupancy of the Mammoth Crossing Project.</p>		<p>Less Than Significant</p>

**Table I-1
Summary of Significant Environmental Impacts & Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance after Mitigation
<p><i>Impact UTIL-8 Cumulative Water Supply</i></p> <p>Implementation of the Project in combination with the related projects in would further increase demands on water supply. The projects listed in the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall water supply through the project approval process, and would consider project approvals in the light of existing and projected water supplies of the Town. Therefore the cumulative water generation is likely overstated.</p> <p>It has been determined that there would be insufficient supplies of water during dry years at Town buildout without the Project and that there would also be insufficient water for the Project plus the related projects during dry water years. Deficiencies of over 1,000 af would occur in a single dry year, which is considered the lowest historical runoff for the watershed. Thus, impacts of the Project together with the related projects on overall MCWD water supply during single and multiple dry year scenarios would be significant.</p> <p>In compliance with General Plan Policy R.4.A, the Town shall work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established prior to development approvals. Therefore, because these future water sources do not exist at present the Project's contribution to overall water supply demand within the Town would be cumulatively considerable, and cumulative water supply impacts would be significant.</p>	<p>No mitigation measures are available to fully mitigate such cumulative impacts to water supply. Although Project-specific impacts (see Impact UTIL-6) were found to be less than significant, a mitigation measure were recommended to reduce the Project's incremental contribution to water supply impacts. The mitigation measure is as follows:</p> <p><i>Mitigation Measure UTIL-6 Water Supply</i></p> <p>To further reduce the Project's demand on water services, the Project Applicant should:</p> <ol style="list-style-type: none"> Ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets; Install either drip irrigation or a "smart sprinkler" system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property; Select and use drought-tolerant, low-water consuming plant varieties and little or no use of turf in the landscape design to reduce irrigation water consumption; Install high efficiency water fixtures such as low flush and dual flush water toilets and urinals, and shall limit the number of showerheads to one very low flow fixture per stall, in new construction. Low-flow faucet aerators should be installed on all sink faucets; and Install Energy Star high efficiency dishwashers and clothes washers. 	<p>Significant and Unavoidable</p>

II. ENVIRONMENTAL SETTING

A. INTRODUCTION

This section provides a brief overview of the Mammoth Crossing Project (“Project”) site’s existing regional and local setting. Additional descriptions of the environmental setting as it relates to each of the environmental issues analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR are included in the environmental setting discussions contained within Sections IV.B through IV.N. Also provided in this section is a list of related projects, which is used as the basis for the discussions of cumulative impacts throughout Section IV.

B. EXISTING CONDITIONS

Regional Setting

The Project site is located in the Town of Mammoth Lakes (“Town”), Mono County, California. The Town is located on the eastern slopes of the Sierra Nevada at an elevation of approximately 7,900 feet above sea level within Section 34, Township 3 South, and Range 27 East Mt. Diablo Base (“MDB”) and Meridian (“M”). The Town is located approximately 168 miles south of Reno, Nevada, and approximately 310 miles north of Los Angeles, California. Neighboring communities of the Town of Mammoth Lakes include June Lake to the northwest, Benton to the east, and Crowley Lake to the southeast (refer to Figure II-1). Regional access is provided by U.S. Highway 395 and California State Route 203 (“SR 203”). Local roadways that provide access to the Project site include Minaret Road, Main Street, Lake Mary Road and Canyon Boulevard. SR 203 is known as Main Street throughout the Town up to the Main Street-Lake Mary Road/Minaret Road intersection and then continues north through the North Village along Minaret Road to connect to Mammoth Mountain Lodge.

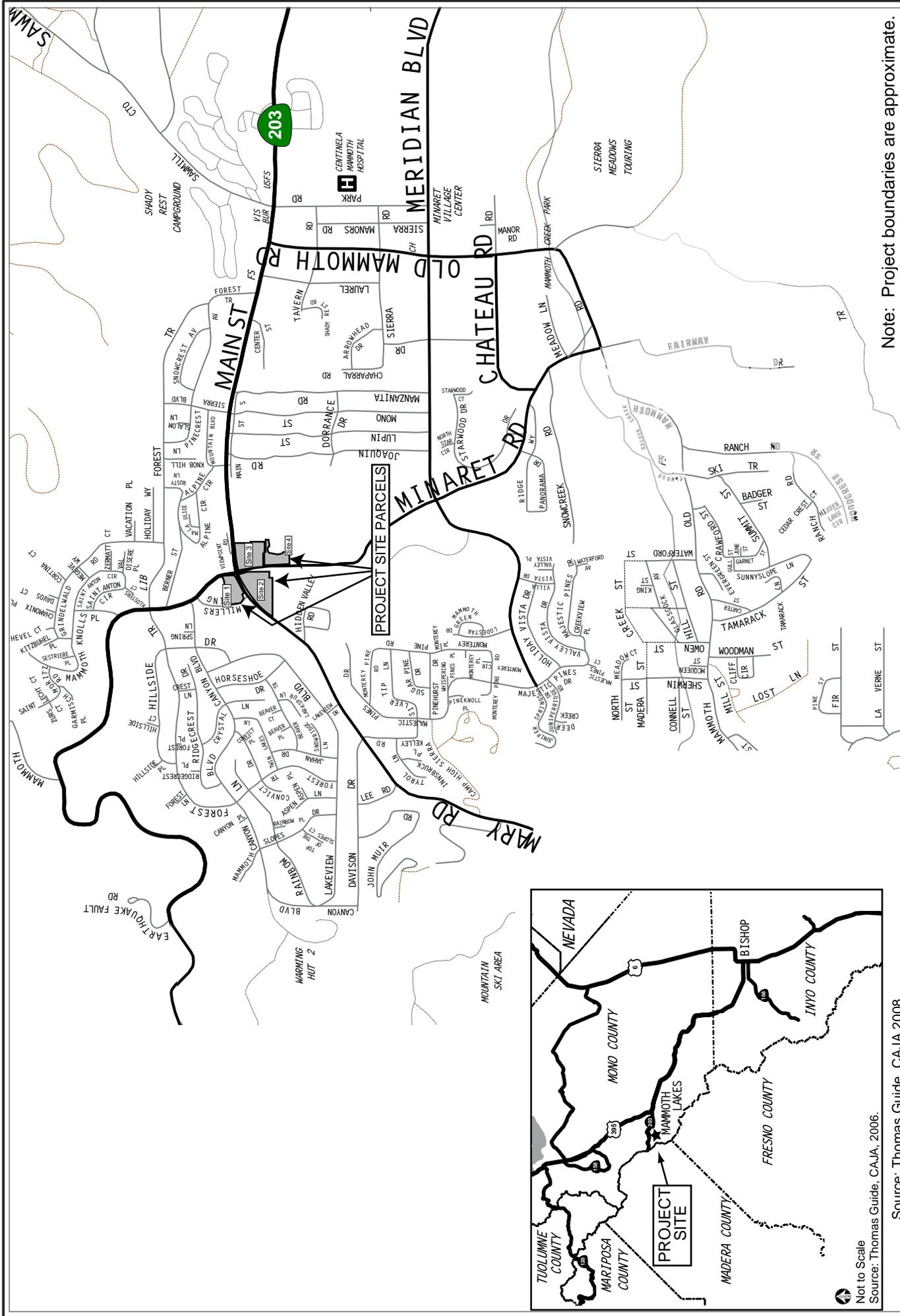
Local Setting

The Project, approximately 11 acres, is comprised of four separate sites located in the northwest portion of Town. Sites 1 through 3 include existing development and are within the *North Village Specific Plan* (“Specific Plan”) area. Sites 1 through 3 are located at the northwest, southwest and southeast corners of the Main Street-Lake Mary Road/Minaret Road intersection, respectively. Site 4 is undeveloped and is located within the *Lodestar Master Plan* area. Site 4 is located to the south of the Main Street-Lake Mary Road/Minaret Road intersection to the east of Minaret Road (refer to Figure II-2). Site 4 is proposed to be incorporated into the Specific Plan boundary and subsequently removed from the Lodestar Master Plan area. No new development is proposed on Site 4 as part of this Project. The proposed development on Site 4 consists of 45 residential units. The Town previously approved this development and a Mitigated Negative Declaration was adopted pursuant to CEQA. This is discussed in more detail in Section III, Project Description, of this Draft EIR. Assessor Parcel Numbers (“APNs”) that make up the four Project sites are as follows:

- Site 1 - APNs 33-044-07 and 33-044-10,
- Site 2 - APN's 33-010-02 through -07, and 33-010-31 and -32,
- Site 3 - APN's 33-100-14 through -18 and
- Site 4 - APN 33-330-47.

As previously stated Project Sites 1 through 3 include existing development. Site 1 comprises approximately two acres, of which approximately .05 acres is a vacated right-of-way. In addition to the existing operating Whiskey Creek Restaurant, Site 1 contains several existing occupied office/retail buildings and paved surface parking areas. Site 2 comprises a total of approximately five acres, of which approximately one acre is a vacated right-of-way. Site 2 has a vacant church and seven existing occupied buildings, including the North Village Inn, some office/retail and storage structures, and surface parking. Site 3 comprises a total of approximately three acres. The existing vacant Ullr Lodge and White Stag Inn are located on Site 3. Both the Ullr Lodge and the White Stag Inn have surface parking areas and a series of small accessory structures on site. There is no existing development on Site 4.

The *Town of Mammoth Lakes General Plan* ("General Plan") designates the Project Sites 1, 2 and 3 as *North Village Specific Plan* ("Specific Plan") and Project Site 4 as Resort (R) (refer to Figure II-3 and II-4). The Specific Plan designation is intended to create visitor-oriented entertainment retail and lodging district anchored by a pedestrian plaza and a gondola connection to Mammoth Mountain Ski Area. Uses include hotels and similar visitor accommodations along with supporting restaurants, retail, and services. Development projects will provide a wide range of amenities and services that enhance the visitor experience. Maximum overall density is 3,020 rooms and 135,000 square feet of commercial. The specific allocation of density, location of uses, and development standards are contained in the Specific Plan as adopted in 2000 and amended in 2005 are discussed in detail in Section IV.I, Land Use and Planning, of this Draft EIR. In the General Plan, Resort use is characterized with primary emphasis to visitor lodging, amenities and services. Development in the Resort designation is generally applied to large parcels and is physically connected internally and to all primary visitor oriented destinations with an integrated system of streets, sidewalks, and recreational paths. This designation includes mixed visitor oriented uses including lodging, visitor oriented commercial, and recreation uses.



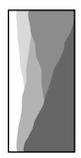
Note: Project boundaries are approximate.

Figure II-1
Regional & Vicinity Map



Not to Scale

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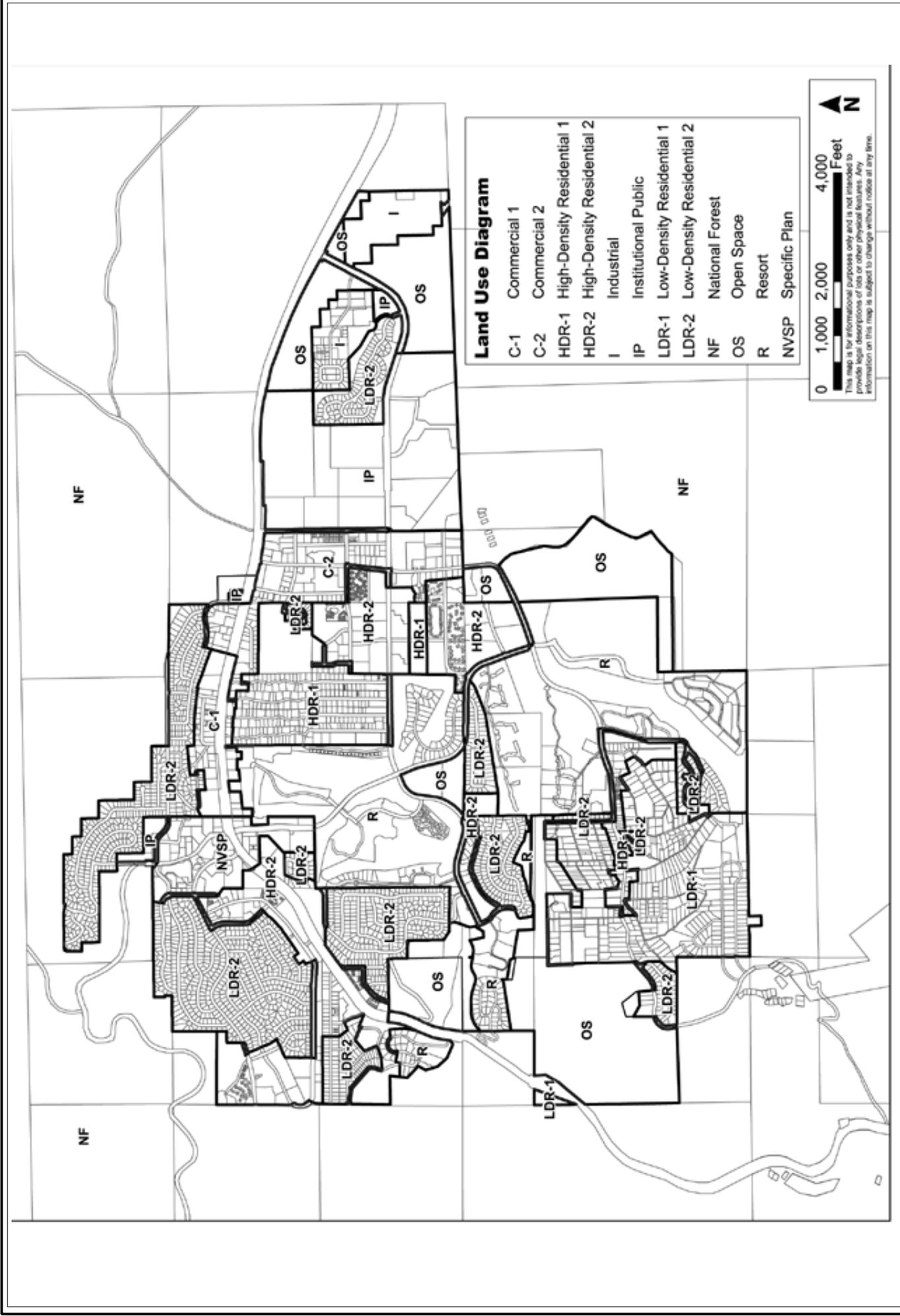


Source: Thomas Guide, CAJA 2008.

Not to Scale
Source: Thomas Guide, CAJA, 2006.



Source: IK Curtis; Merrick Architecture, October 2007; Christopher A. Joseph & Associates, 2007.



Land Use Diagram

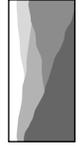
C-1	Commercial 1
C-2	Commercial 2
HDR-1	High-Density Residential 1
HDR-2	High-Density Residential 2
I	Industrial
IP	Institutional Public
LDR-1	Low-Density Residential 1
LDR-2	Low-Density Residential 2
NF	National Forest
OS	Open Space
R	Resort
NVSP	Specific Plan

0 1,000 2,000 4,000 Feet

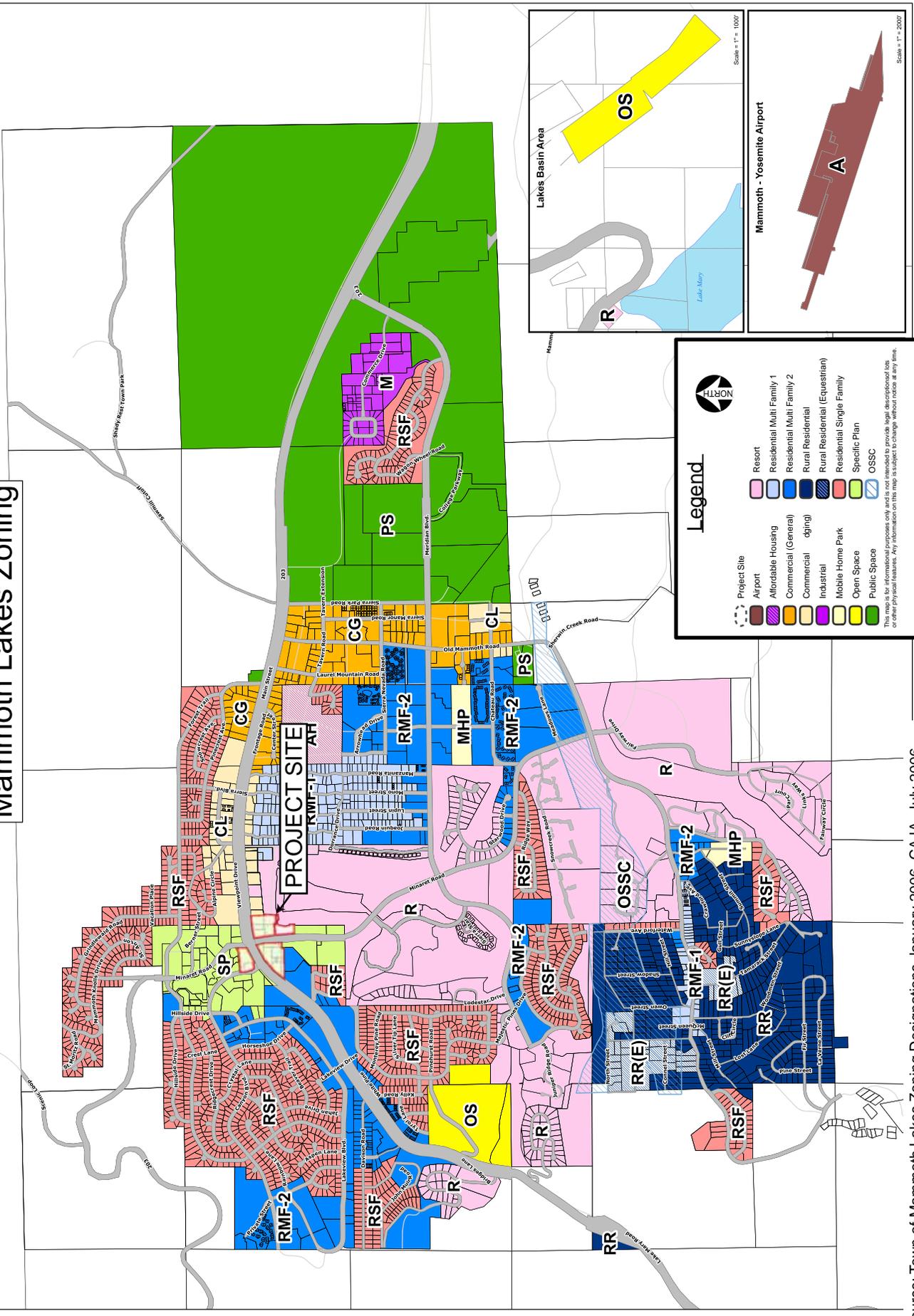
This map is for informational purposes only and is not intended to provide legal descriptions of lots or other physical features. Any information on this map is subject to change without notice at any time.

Figure II-3
Land Use Map

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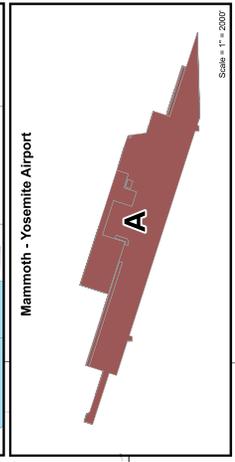
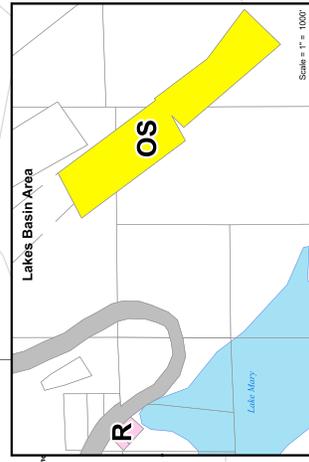
Mammoth Lakes Zoning



Legend

	Project Site		Resort
	Airport		Residential Multi Family 1
	Affordable Housing		Residential Multi Family 2
	Commercial (General)		Rural Residential
	Commercial (ding)		Rural Residential (Equestrian)
	Industrial		Residential Single Family
	Mobile Home Park		Specific Plan
	Open Space		OSSC
	Public Space		

This map is for informational purposes only and is not intended to provide legal descriptions or other physical features. Any information on this map is subject to change without notice at any time.



Source: Town of Mammoth Lakes Zoning Designations January 2006, CAJA, July 2006.

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Figure II-4
Zoning Map

Surrounding Land Uses

The Project Site is located in an urbanized area surrounded by existing development. Figure II-5 illustrates an overall view of the surrounding land uses. Figure II-6 through Figure II-10 represent views of the Project's sites and surrounding adjacent land uses. The surrounding land uses for the Project's four locations are as follows:

- Site 1 is bounded to the north by the Fireside Condominiums, to the east by Minaret Road, to the south by Lake Mary Road and to the west by Canyon Boulevard. All parcels surrounding Site 1 are within the Specific Plan zoning district.
- Site 2 is bounded to the north by Lake Mary Road, to the east by Minaret Road, to the south by the Sierra Star Golf Course and to the south and west by the Hidden Valley Condominiums. Site 2 is bounded by Specific Plan land uses to the north, east and south, and by Residential Multi-Family 2 (RMF-2) land use zoning to the south and west.
- Site 3 is bounded by Main Street to the north, the Holiday Haus Inn and the Sierra Star Golf Course to the east, Site 4 and the Sierra Star Golf Course to the south and Minaret Road to the west. Site 3 is bounded by Specific Plan land use zoning to the north and west, and Commercial (Lodging) and Resort (R) zoning to the east, and Resort (R) zoning to the south.
- Site 4 is bounded by Site 3 to the north, the Sierra Star Golf Course to the east, residential development to the south and Minaret Road to the west. Site 4 is bounded by Specific Plan land use zoning to the north, west and south, and by Resort (R) zoning to the east.



Source: IK Curtis; Merrick Architecture, October 2007; Christopher A. Joseph & Associates, 2008.



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Figure II-5
Surrounding Land Uses



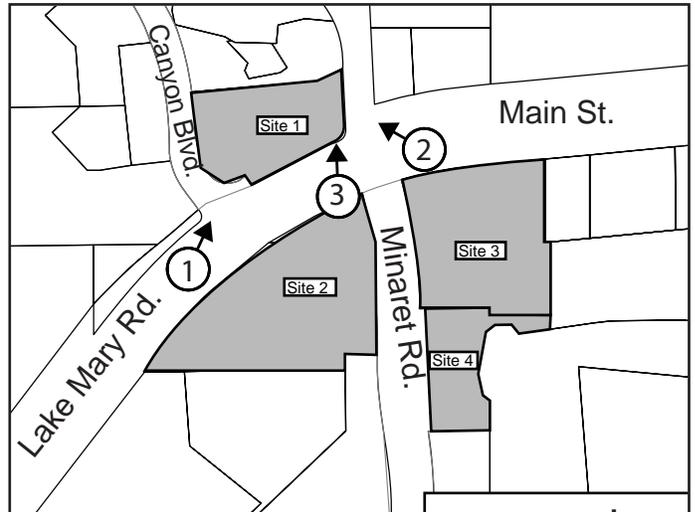
View 1: Looking northeast towards Site 1 across Lake Mary Road.



View 2: Looking northwest towards Site 1 across the intersection of Main Street and Minaret Road.



View 3: Looking north towards Site 1 across Lake Mary Road from Site 2.



Source: Christopher A. Joseph & Associates, 2008.



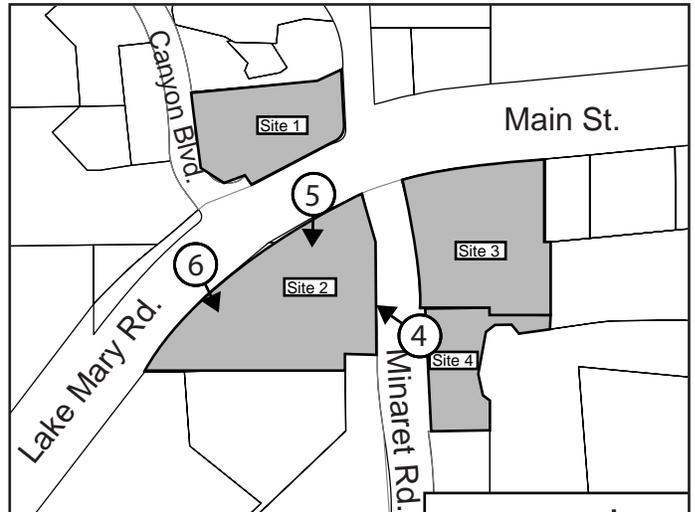
View 4: Looking northwest towards Site 2 across Minaret Road.



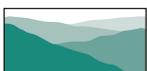
View 5: Looking southwest towards Site 2 from Lake Mary Road.



View 6: Looking southeast towards Site 2 from Lake Mary Road.



Source: Christopher A. Joseph & Associates, 2008.





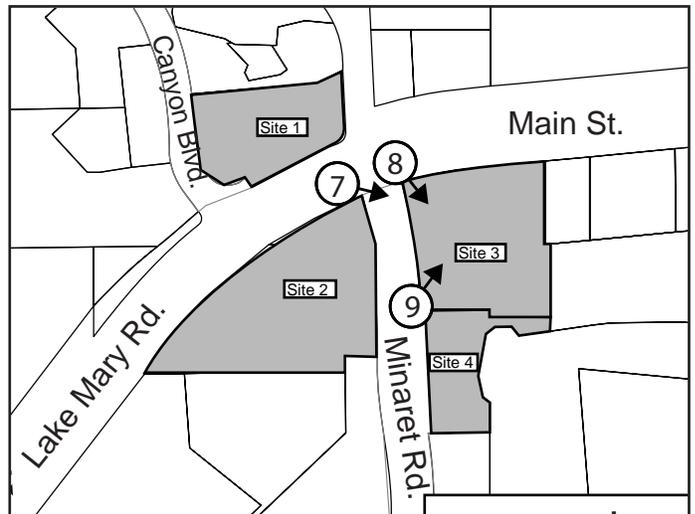
View 7: Looking southeast towards Site 3 across Minaret Road.



View 8: Looking southeast towards Site 3 from the southeast corner of Main Street -Lake Mary Road and Minaret Road intersection.



View 9: Looking northeast towards Site 3 from Minaret Road.



Source: Christopher A. Joseph & Associates, 2008.



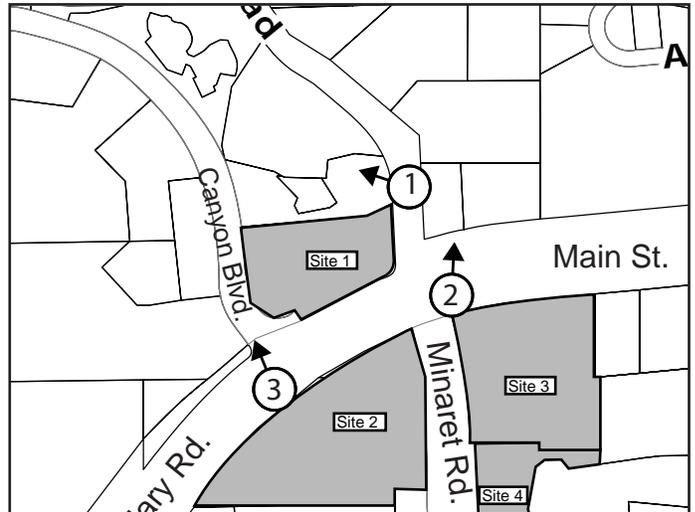
View 1: Looking north towards residential uses north of site 1.



View 2: Looking north towards commercial uses east of Site 1 and north of Site 2.



View 3: Looking northwest of Site 1, and Site 2.



Source: Christopher A. Joseph & Associates, 2008.



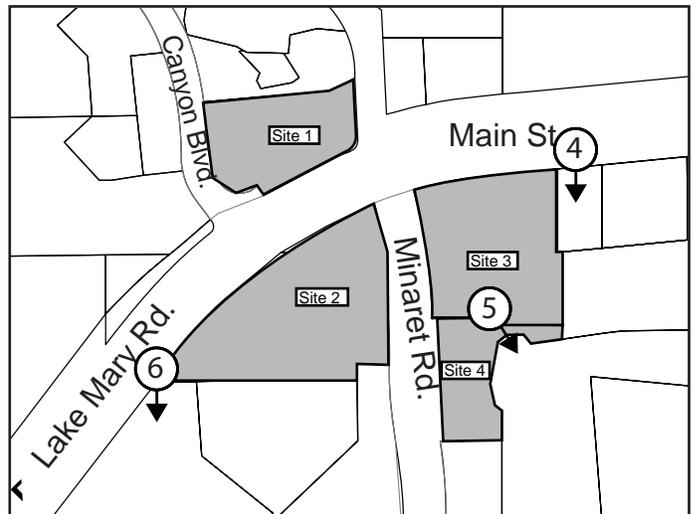
View 4: Looking south towards undeveloped land east of Site 3.



View 5: Looking southeast towards recreational uses southeast of Site 3.



View 6: Looking south at adjacent residential uses west of Site 2.



Source: Christopher A. Joseph & Associates, 2008.

C. RELATED PROJECTS

Sections 15126 and 15130 of the State *CEQA Guidelines* provide that EIRs consider the significant environmental effects of a proposed project as well as “cumulative impacts.” Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts (State *CEQA Guidelines* Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State *CEQA Guidelines* Section 15130(b)(1)(A)).

All related projects (i.e., those projects with pending applications, recently approved, under construction, recently completed or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the proposed Project) are included in the EIR. These projects can include, if necessary, projects outside of the control of the Lead Agency or, a summary of projections contained in an adopted or certified general plan or related planning document which describes or evaluates regional or area-wide conditions contributing to the cumulative impact. For an analysis of the cumulative impacts associated with these related projects and the proposed Project, the reader is referred to the cumulative impact discussions under each individual impact category in Chapter IV, Sections IV.B through IV.N.

Table II-1 lists the related projects identified for the Project. These related projects consist of all approved, proposed, or projects currently under construction located in the Town (refer to Figure II-11). The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The list includes projects of various land uses, including Low-Density Residential, High-Density Residential, Commercial, Institutional Public Resort, Industrial and the North Village Specific Plan.

**Table II-1
Related Projects**

No.	Project/Description	Location	Land Use	Size
1	Tavern Road Park-N-Ride/Mammoth Lakes Housing, Inc. 31 affordable apartments, commercial space, and a parking garage on the existing Park-N-Ride.	APN: 35-180-12 105 Old Mammoth Road	C	31 units
2	The Jeffreys/Mammoth Lakes Housing 14 unit affordable housing apartment community with an additional 2 units in an existing duplex.	APN: 33-150-07, 08 312 and 336 Lupin Street	HDR-1 – RMF-1	14 units
3	Tosca/Big Air Mountain 11 high-density dwelling units	APN: 22-331-01 1787 Old Mammoth Road	HDR-1	11 units

**Table II-1
Related Projects**

No.	Project/Description	Location	Land Use	Size
4	Mammoth Lakes Foundation Student Housing - 74 studio and 1-bedroom dormitory units within two, 2-story structure for college housing with 102 understructure parking spaces in three phases. A connecting building with a 2-bedroom manager's unit.	APN: 35-010-46 1500 College Parkway	HDR	74 units
5	Monache/Westin A condominium hotel with 230 dwelling units, related service functions, and recreational facilities; a parking structure with 236 spaces; 4,000 sf public restaurant	APN: 33-020-3137 50 Hillside Drive	SP	230 units 4,000 sf
6	8050 A/B/C 23 unit multi-family residential condominiums. 21 fractional-share condominium ownership units and 76 understructure parking spaces. The units are to be maintained as a private residence club.	APNs: 33-044-11, 33-044-04 50 Canyon Boulevard	V – SP	44 units
7	Tallus 19 single family residences, fractional use. 60 units of density sold in the Sierra Star Master Plan Area	APN: 33-370-02 525 Obsidian Place	LDR-1 – R	19 units
8	Mammoth Hillside Phase I approval of a mixed-use, 193-unit condominium hotel in the North Village Specific Plan area (west side of Canyon Boulevard above Lake Mary Road). The project includes 30 townhome condominiums (Phase II), conference facilities, restaurant, spa, and understructure parking garage with 260 spaces on approximately a 7-acre site. In addition the project will include 37 employee units	APN: 31-110-27 107 Lakeview Boulevard; APN: 33-010-02 106 Lake Mary Road; APN: 33-020-10, 80 Lake Mary Road; APN: 33-020-11 15 Canyon Boulevard; APN: 33-020-21 17 Canyon Boulevard; APN: 33-020-33 49 Canyon Boulevard	SP	230 units
9	Meridian Court/Mammoth Lakes Housing 24 workforce housing units. Conditional Certificate of Occupancy issued at the end of May 2007.	APN: 33-160-82 504 Mono Street	HDR-2 – RMF-2	24 units
10	Fairway 4/5 (Woodwinds) 28 townhome condominium units within 8 structures.	APN: 33-380-01, 2059 Bear Lake Drive	R	28 units
11	Sierra Star 4b Housing/Intrawest & Mammoth Lakes Housing, Inc. 40 workforce residential condominium units within 7 structures.	APN: 33-110-15, 61 Callahan Way	HDR – R	40 units
12	Intrawest South Hotel 251 high-density dwelling units	APNs: 33-04-115, -116, -318, -305, -316 6180 Minaret Road	NVSP	251 units
13	Altis 22 high-density dwelling units	APN: 31-260-01, -02, -03 880 Bridges Lane	R	24 units
14	Fairway 16 (Solstice) 58 residential condominium units within 9 structures	APN: 33-330-56 2004 Sierra Star Parkway	R	58 units
15	Stonegate Mammoth Phase 1: 14 single family residential units	APN: 33-100-43, -26, -41 5808 Minaret Road	LDR -1 – SP	14 units

**Table II-1
Related Projects**

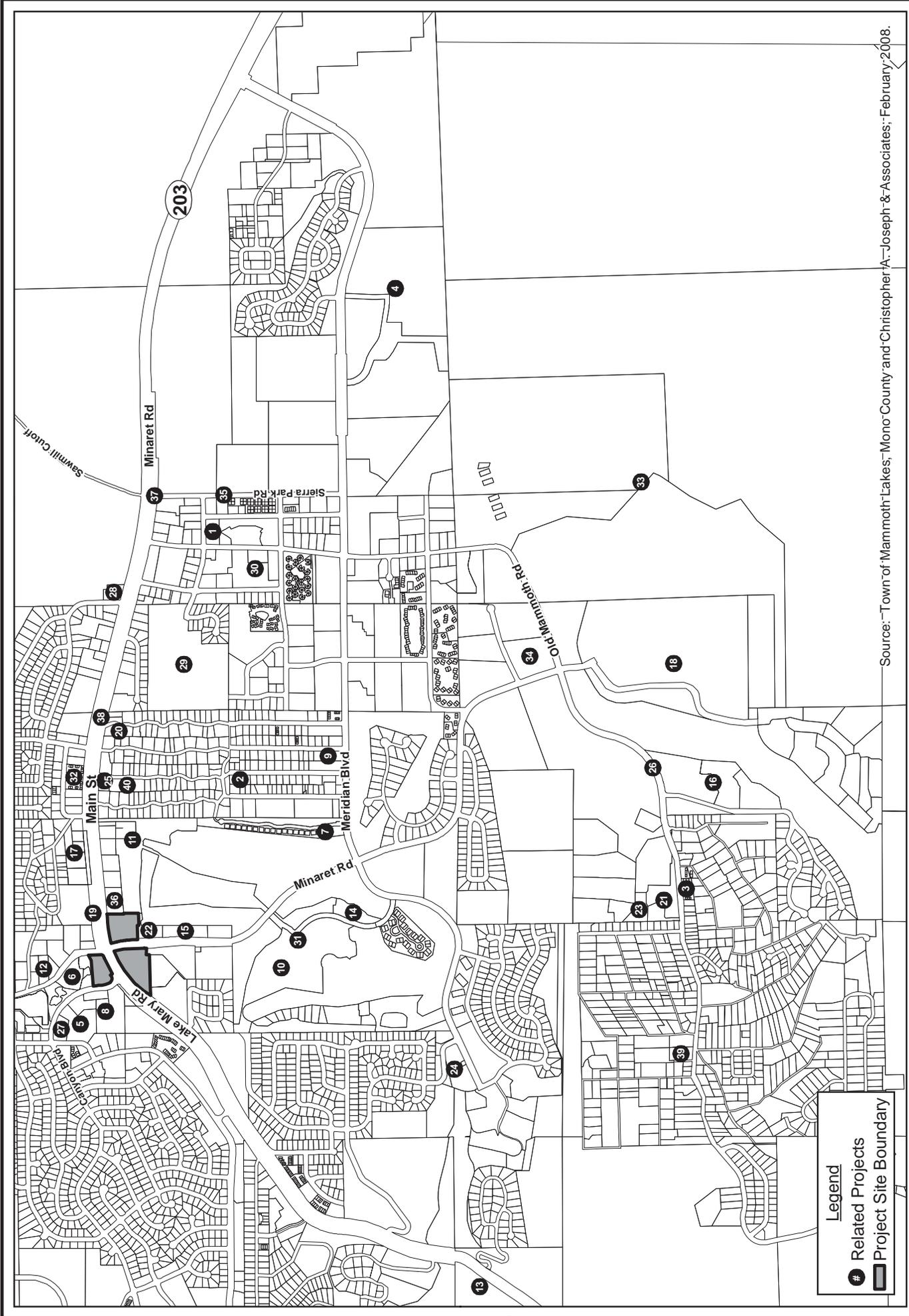
No.	Project/Description	Location	Land Use	Size
16	Snowcreek VI, The Lodges 106 unit multi-family development	APN 40-130-03, 51 Ranch Road APN: 40-130-01 61 Ranch Road APN: 40-130-02 71 Ranch Road	HDR - R	106 units
17	Mammoth View 198-Unit Private Residence Club (92 units) and Condo Hotel (106 units) project on the former 5.5-acre Swiss Chalet site.	APN: 33-082-06, 41 Alpine Circle; APN: 33-082-07 11 Alpine Circle; APN: 33-082-08 3704 Main Street; APN: 33-082-09 3730 Viewpoint Road; APN: 33-082-10 3752 Viewpoint Road; APN: 33-082-11 3776 Viewpoint Road; APN: 33-082-12 3814 Viewpoint Road.	HDR – CL	198 units
18	Snowcreek VIII Amendments to Snowcreek Master Plan for 770 condominium units, 80 affordable housing units, 400 hotel/private residential units, and 75,000 square feet of non-residential uses on remaining undeveloped parcels.	APN's: 40-040-20, 40-070-10, 40-070-11, 40-070-12, 40-070-13, 40-070-23, 40-140-04, 40-140-05 4, 5, and 7 Fairway Drive; 942, 1110, and 1254 Old Mammoth Road; and two un-addressed parcels west of Sherwin Creek Road	R – OS	1,250 units 75,000 sf
19	Mammoth Gateway 11 unit condominiums	APNs: 33-110-11, -12 3771 Main Street	HDR – CL	11 units
20	Manzanita Apts./Mammoth Lakes Housing 14 unit workforce housing community on the corner of Manzanita and the frontage Road south of Main Street	APNs: 33-124-03, -04 3477 Main Street, 32 Manzanita Road	HDR	14 units
21	Aspen Village Phase 1/Mammoth Lakes Family Associates Affordable housing project with 48 units and a community center.	APN: 40-040-36, -38 1616-1700 Old Mammoth Road	R	48 units
22	Tanavista 45 residential-unit condominium units with quarter share fractional ownership.	APN: 33-330-47 5862 Minaret Road	HDR – R	45 units
23	Aspen Village Phase 2/Mammoth Lakes Housing 24 affordable "townhome" condominium units on a 1-acre site, adjacent to Aspen Village Phase I.	APN: 40-040-39 1616 Old Mammoth Road	HDR	24 units

**Table II-1
Related Projects**

No.	Project/Description	Location	Land Use	Size
24	Eagle Lodge-Juniper Ridge Mixed-use skier day lodge, commercial, and residential development located on a 3.81-acre site, including 180 dwellings, understructure parking facility (190 spaces), a small open ice rink, conference rooms, and a convenience market.	APNs: 32-040-08, -12 4000 Meridian Boulevard	HDR – R	180 units 21,000 sf
25	Teslaa Veterinary Hospital/3599 Main Street Veterinary Hospital with accessory animal boarding for a maximum of 12 dogs within the Old Blondies Restaurant Building.	APN: 33-122-10 3599 Main Street	C	3,600 sf
26	Snowcreek VII: Hilltop Snowcreek VII, a multi-family residential project with 118 condominiums within 36 buildings, 6 duplexes, 14 triplexes, and 16 four-plexes. The site is 38.55 acres.	APN: 40-040-20 85 and 1254 Old Mammoth Road	HDR – R	118 units
27	Town of Mammoth Lakes Parking Structure Municipal parking garage consisting of 340 parking spaces	APN: 33-020-36 99 Canyon Boulevard	IP	340 parking spaces
28	Mammoth Lakes Fire Protection District Station #1 Demolition of old station and construction of new station; Under Construction	APN: 35-010-12 3150 Main Street	IP – PS	17,200 sf
29	Hidden Creek Crossing (Shady Rest) 405 workforce housing residential units and 3,000 square feet of commercial space.	APN: 35-010-20, no address assigned yet.	HDR – AH	405 units 3,000 sf
30	Clearwater Mammoth Mixed-use project; 339 units with 480 rooms, 28,205 sf of commercial and 33 3-bedroom units of workforce housing.	APN 35-230-05 164 Old Mammoth Road APN: 35-230-06 202 Old Mammoth Road APN: 35-230-07 248 Old Mammoth Road.	HDR – CG	339 units 28,205 sf
31	Sierra Star Master Plan (SSMP) Amendments to existing Lodestar Master Plan (LMP) to allow for developmen of 1,251 units including the currently 451 developed units within the LMP area. A maximum of 29,000 sf of commercial and 30,000 sf of conference center, including 5-star hotel with a building footprint of 72,000 sf, and heights from 140 to 200 feet. Setbacks & coverage are similar to current zone standards.	APN's 33-330-33, 33-330-50, 33-330-54, 33-330-55, 33-330-25 North of Meridian Boulevard, bisected by Minaret Road	R	800 units 59,000 sf
32	Grey Eagle 12 units within 6 buildings	Phase 1: APN: 35-025-21 85 Mountain Boulevard; Phase 2: APN: 35-025-22 45 Mountain Boulevard	HDR – CL	12 units
33	Propane Tank Site/Turner Gas Tank Farm	APN: 40-14-004 no address assigned yet	R-OS	10,393 sf
34	The Sherwin/Cardinal Investments 108 unit condominium hotel for property located at the northeast corner of Old Mammoth Road and Minaret Road.	APN: 40-020-01 2 Meadow Lane	RMF-2	108 units
35	Town of Mammoth Lakes Multi-Use Facility/Ice Rink Municipal ice/in-line skating rink.	APN: 35-010-56 416 Sierra Park Road	IP	18,200 sf
36	Holiday Haus 74-unit hotel on the existing Holiday Haus site (redevelopment)	APNs: 33-110-01, -02 3863 and 3905 Main Street	HDR – CL	74 units

**Table II-1
Related Projects**

No.	Project/Description	Location	Land Use	Size																
37	Town of Mammoth Lakes Police Station Construction of a new police facility.	APN: 35-010-59 Corner of California State Route 203 and Sierra Park Road	IP	13,000																
38	State Court Building/The Administrative Offices of the Courts Construction of a new state court facility and relocation of existing court functions	APN: 35-010-60 2667 Main Street	IP	20,000																
39	Ettinger Condominiums 10 Condominium units in 5 buildings	APN: 22-242-14 2144 Old Mammoth Road	HDR - RMF-1	10 units																
40	Tihana Town Homes Residential PUD consisting of 10 single family residential units in five buildings. Eight 1-bedroom and two 3-bedroom units	APN: 33-122-08 48 Lupin Street	HDR - RMF-1	10 units																
			Total Units	4,844																
			Total Square Footage	272,598																
<p><i>Land Use Key:</i> <i>sf = square feet</i></p> <table> <tr> <td><i>LDR-1 = Low-Density Residential 1</i></td> <td><i>RR = Rural Residential</i></td> </tr> <tr> <td><i>LDR-2 = Low-Density Residential 2</i></td> <td><i>C = Commercial</i></td> </tr> <tr> <td><i>HDR-1 = High-Density Residential 1</i></td> <td><i>CG = Commercial General</i></td> </tr> <tr> <td><i>HDR-2 = High-Density Residential 2</i></td> <td><i>OS = Open Space</i></td> </tr> <tr> <td><i>RSF = Residential Single Family</i></td> <td><i>IP = Institutional Public</i></td> </tr> <tr> <td><i>RMF = Residential Multi-Family</i></td> <td><i>R = Resort</i></td> </tr> <tr> <td></td> <td><i>I = Industrial</i></td> </tr> <tr> <td></td> <td><i>NVSP = North Village Specific Plan</i></td> </tr> </table>					<i>LDR-1 = Low-Density Residential 1</i>	<i>RR = Rural Residential</i>	<i>LDR-2 = Low-Density Residential 2</i>	<i>C = Commercial</i>	<i>HDR-1 = High-Density Residential 1</i>	<i>CG = Commercial General</i>	<i>HDR-2 = High-Density Residential 2</i>	<i>OS = Open Space</i>	<i>RSF = Residential Single Family</i>	<i>IP = Institutional Public</i>	<i>RMF = Residential Multi-Family</i>	<i>R = Resort</i>		<i>I = Industrial</i>		<i>NVSP = North Village Specific Plan</i>
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	<i>I = Industrial</i>																			
	<i>NVSP = North Village Specific Plan</i>																			
<p><i>Note: Some projects have been built or are complete. These projects have been included because they represent the existing traffic baseline (2004) conditions. Of the total 4,844 residential units approximately 800 would be affordable housing.</i> <i>Source: Town of Mammoth Lakes Community Development Department, Ellen Clark, Senior Planner, July 2008.</i></p>																				



Source: Town of Mammoth Lakes; Mono County and Christopher A. Joseph & Associates; February, 2008.

Figure II-11
Related Projects Map



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III. PROJECT DESCRIPTION

A. PROJECT APPLICANT

The Project Applicant for the proposed Mammoth Crossing Project (“Project”) is:

Mammoth Crossing Ventures, LLC
Doug Regelous
c/o Leslie Anne Klusmire, AICP, ASLA
PO Box 89
Bishop, CA 93514

B. PROJECT CHARACTERISTICS

The following is a description of the components that would comprise the proposed Mammoth Crossing Project. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public plazas. The Project is located within the North Village Specific Plan (“Specific Plan”) area, and includes a series of amendments to the Specific Plan as originally adopted in 2000 and amended in 2008, as well as amendments to the *Town of Mammoth Lakes General Plan* (“General Plan”), which would be required to accommodate the Project’s proposed land uses. The Project proposes setback, height, density, and policy amendments to the Specific Plan. The specific amendments have been included as Appendix N of this Draft EIR. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town of Mammoth Lakes (“Town”). Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project site, approximately 11 acres, consists of four locations, three of which would be developed with new uses as mentioned above. These three development sites, which include parcels at the northwest, southwest and southeast corners of the Main Street-Lake Mary Road/Minaret Road intersection, total approximately nine acres. In total, the Project would include the construction of up to 742 condominium/hotel rooms, up to approximately 69,150 square feet of hotel amenities and operations and general retail uses, 40,500 square feet of retail development, and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site. Proposed development at the three sites would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, Site 4 is proposed to be incorporated as approved into the Specific Plan boundary and subsequently removed from the *Lodestar Master Plan* area. The proposed development on Site 4 consists of 45 residential units. The Town previously approved this development and a Mitigated

Negative Declaration was adopted pursuant to CEQA. Therefore environmental impact analysis for development on Site 4 is not included in the Draft EIR.

Figure III-1, Project Site Map, illustrates the four sites that make up the Project area and their relationship to the Specific Plan. Figure III-2, Project Development Areas, illustrates the three of the four sites where development is proposed to occur as a result of this Project. Site 4 is not shown on Figure III-2, as no development is proposed to occur at this location as part of this Project.

Table III-1 summarizes the principal land uses for each of the four sites comprising the Project. Project features for each site are described in detail below.

**Table III-1
Project Site Land Uses**

Project Locations	Acres	Hotel Rooms	Density⁽¹⁾ (room/acres)	Hotel/Visitor Amenities⁽²⁾ Square Feet	Retail Square Feet	Affordable Housing⁽³⁾ Square Feet	Parking Spaces⁽⁴⁾
Site 1	1.7939	198	110	14,390	22,000	13,448	241
Site 2	4.5205	364	81	24,640	18,500	22,418	330
Site 3	2.9629	180	61	30,120	0	10,125	149
Site 4⁽⁵⁾	1.3631	0	0	0	0	0	0
Total	10.6404	742	80	69,150	40,500	45,991	720

Notes:

- (1) Density at Sites 1-3 exceeds the maximum allowed density of 48 rooms per acre (RPA) as designated in the Town's North Village Specific Plan. Density is calculated at 742 rooms/9.2773 acres; excludes Site 4 acreage.
- (2) Hotel/Visitor amenities consist of offices, meeting space and common areas associated with proposed lodging uses.
- (3) Off-site affordable housing units would be subject to separate environmental review.
- (4) All parking would be understructure with the exception of limited hotel guest check-in spaces and off-site on-street retail parking for Site 1 and Site 2.
- (5) Site 4 was approved for the construction of 45 units. No additional construction on Site 4 is proposed with this Project.

Source: Mammoth Crossing Ventures, LLC (May 2008).



Source: Merrick Architecture, CAJA 2008.

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Figure III-1
 Project Site Map



Source: Merrick Architecture, CAJA 2008.

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Figure III-2
 Project Development Areas

Site 1 (Whiskey Creek Restaurant)

Site 1 Location

Site 1 is located on the northwest corner of the Main Street-Lake Mary Road/Minaret Road intersection and consists of Assessor Parcel Numbers (“APNs”) 33-044-07 and 33-044-10. Site 1 is also referred to as the “Whiskey Creek Restaurant” site due to the location of this long-standing local eatery.

Site 1 comprises approximately two acres, of which approximately .05 acres is a vacated right-of-way. In addition to the operating Whiskey Creek Restaurant, Site 1 contains several existing occupied office/commercial buildings and paved surface parking areas. All existing development on Site 1, with the possible exception of the Whiskey Creek Restaurant, would be demolished in order to construct a hotel and a series of associated common and amenity areas and uses, retail space, and a public open space plaza (refer to Figure III-3). In addition, understructure parking would be available.

Site 1 Setbacks

Figure III-4 illustrates the proposed property line setbacks for Site 1. The northern property line setback would be eight feet; the eastern property line setback would maintain the existing zero to .5 feet setback along Minaret Road; the southern property line setback would be 15 feet along Lake Mary Road, and would taper to ten feet at the intersection corner of Lake Mary Road and Canyon Boulevard; and the western property line setback rounding the corner from Lake Mary Road onto Canyon Boulevard would remain at ten feet. This western property line setback would taper to zero near the proposed hotel loading area and would then expand to a 20-foot setback near the proposed hotel entrance area for the remainder of the western property line. These proposed setbacks require modifications to existing setback requirements as currently allowed under the Specific Plan.

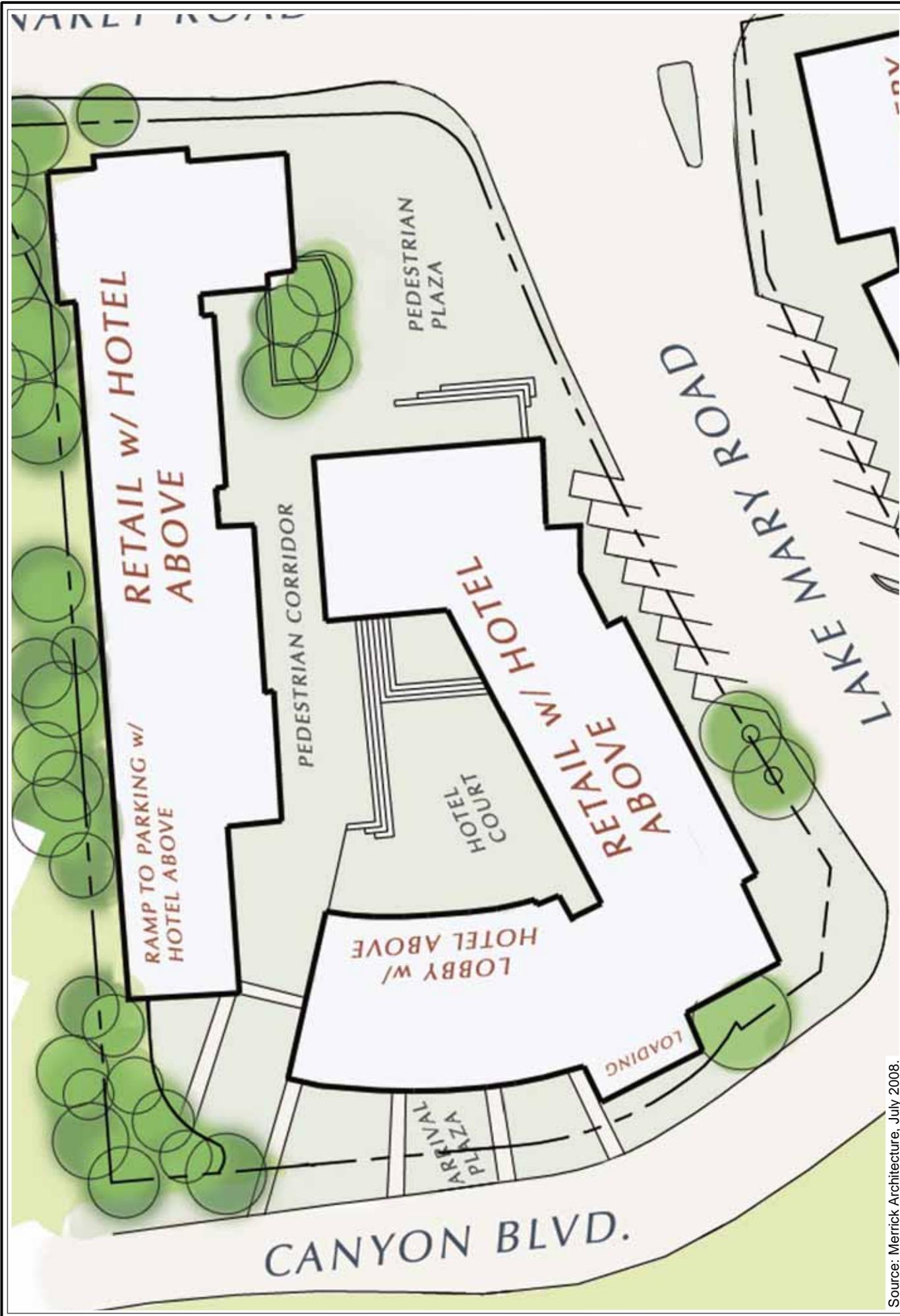
Site 1 Building Heights

Proposed development at Site 1 would involve multiple buildings with varying building heights (refer to Figure III-5). Height measurement standards are pursuant to the proposed amended Specific Plan guidelines. Approximately 74 percent of the total roof area exceeds the existing 50-foot maximum height requirement as set forth in the Specific Plan. The maximum height of any building structure on Site 1 would be the proposed hotel tower feature at the southwestern corner, at 103 feet above the underside of parking garage ceiling (8,035 elevation). Proposed hotel/retail development along the northern and eastern property line would not exceed 76 feet in height above underside of parking garage ceiling (8,025-8,045 elevation). Proposed hotel buildings along the southern and western property line (excluding the hotel tower) would not exceed 93 feet in height above underside of parking garage ceiling (8,035 elevation).

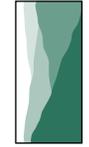
Table III-2 illustrates the specific land uses for Site 1; these land uses are described in detail below.

**Table III-2
Site 1 Proposed Development Land Uses**

Development Areas	Square Feet
Residential Area	
198 Hotel Rooms ⁽¹⁾	117,180
Total Residential Building Area	117,180
Non-Residential Areas	
Hotel Amenities and Operations	
Pool/Spa	1,500
Conference	3,000
Restaurant/Bar Area Within Hotel	3,000
General Use Areas ⁽²⁾	6,890
<i>Total Hotel Amenities and Operations Area</i>	<i>14,390</i>
Retail	
Restaurant/Bar Area Outside Hotel	5,500
General Use Areas ⁽²⁾	16,500
<i>Total Retail Area</i>	<i>22,000</i>
Total Non-Residential Building Areas	36,390⁽³⁾
Parking ⁽⁴⁾	
3 Surface Parking Spaces	
238 Understructure Parking Spaces	
Notes:	
(1) Up to 27 affordable housing one-bedroom units would be provided off site (13,448 sf).	
(2) General use areas can include office space, maintenance facilities, service areas, check-in lobby area, meeting rooms, fitness center, gift shop, clothing, etc.	
(3) Specific square footage numbers listed are estimated and serve to study a maximum non-residential square footage of 36,390 square feet.	
(4) Parking would include 241 on-site spaces and an additional 13 off-site on-street spaces along Lake Mary Road. Site 1 parking would be compliant with Town Municipal Code.	
Source: Mammoth Crossing Ventures, LLC (May 2008).	



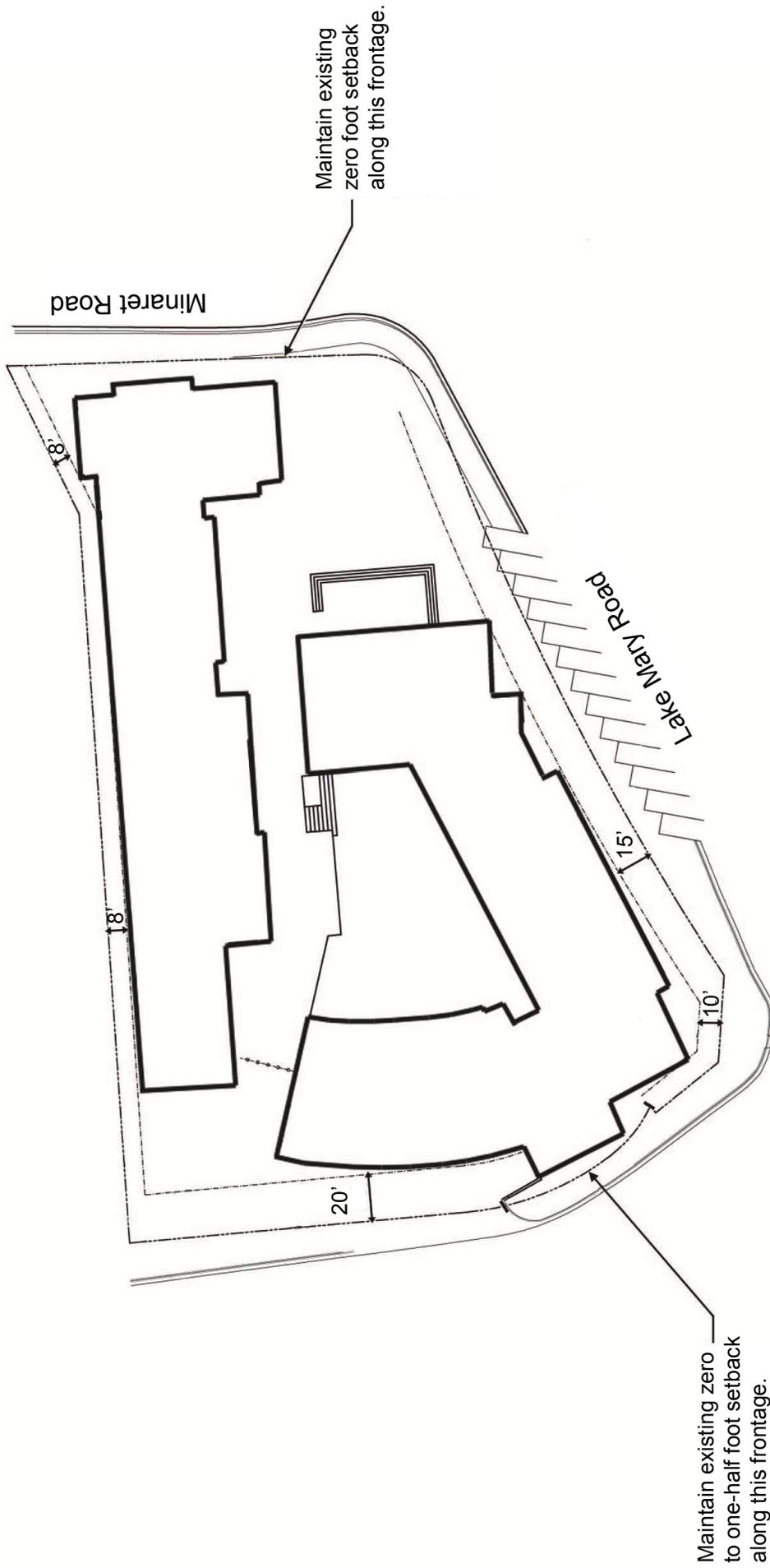
Source: Merrick Architecture, July 2008.



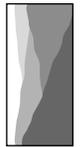
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Figure III-3
Site 1 Development Area



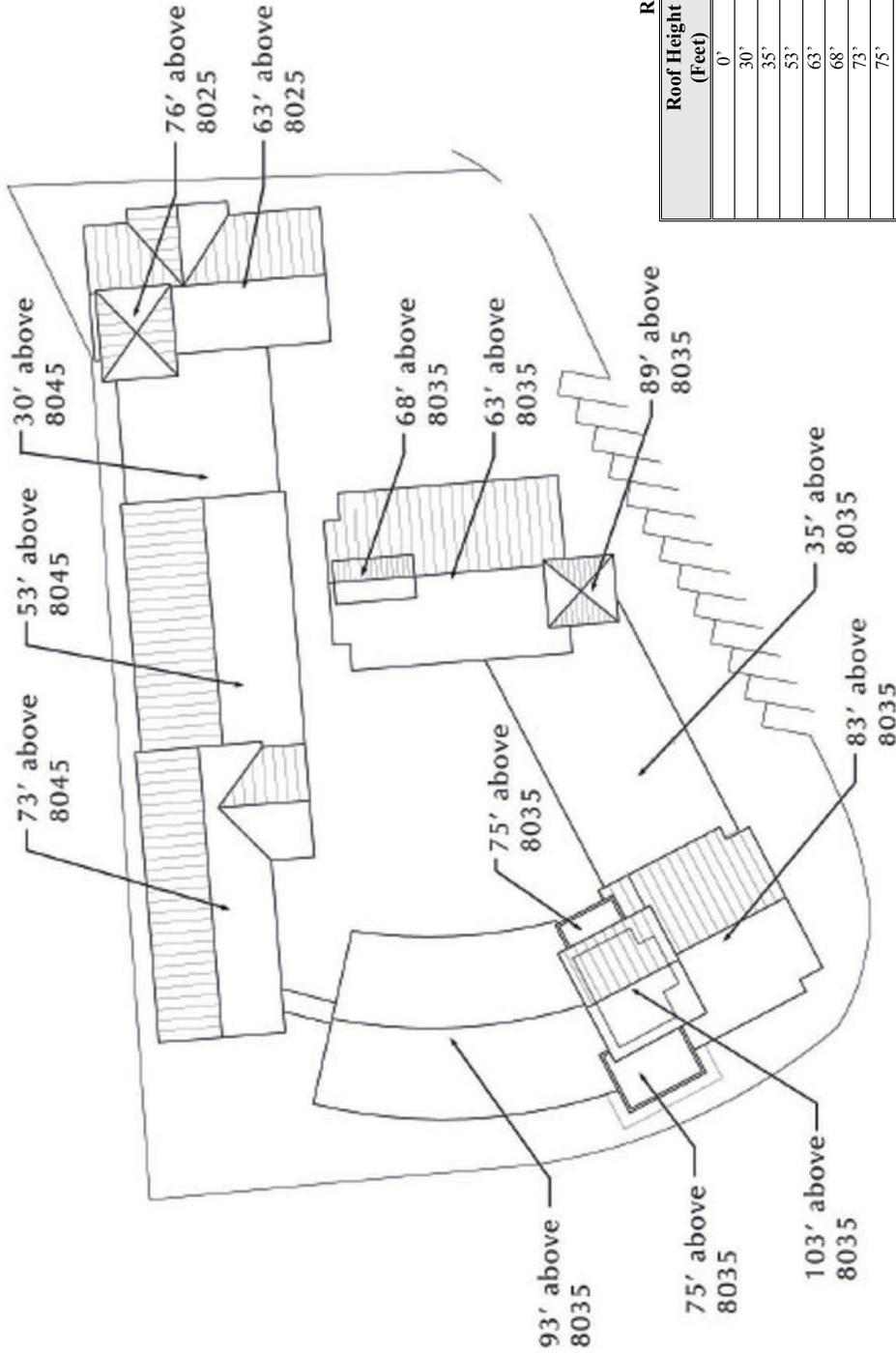
Source: Merrick Architecture, July 2008.



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Figure III-4
Site 1 Property Line Setbacks



Roof Height Distribution on Site 1

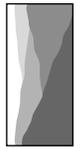
Roof Height (Feet)	Roof Area	Percentage (%)	Percentage of Site (%)
0'	45,347	0.00%	58.03%
30'	3,075	7%	3.94%
35'	5,340	12%	6.83%
53'	5,640	13%	7.22%
63'	0	23%	0.00%
68'	480	1%	0.61%
73'	5,750	13%	7.36%
75'	100	3%	0.13%
76'	950	2%	1.22%
83'	3,340	8%	4.27%
93'	6,380	14%	8.16%
103'	1,740	4%	2.23%
Total Building Area Square Footage	32,795	100%	42%
Total Square Footage of Site	78,142	--	100%

Notes:

- (1) Percentage of building is calculated by the square footage of the building area at given height/total building area square footage (32,795).
- (2) Percentage of site is calculated by the square footage of building area at given height/total square footage of site (78,142)
- (3) Site 1 square footage is calculated by Site 1 acreage (1.7939) multiplied by square feet per acre (43,560)
- (4) A total of 24,380 square footage of roof height is over 50 feet is 24,380.
- (5) 74 percent of Site 1 is over 50 feet.

Note: Elevation numbers represent underside of parking garage ceiling.

Source: Merrick Architecture, July 2008.



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Site 1 Proposed Development Land Uses

Hotel

The hotel would be located fronting Canyon Boulevard, oriented around an inner courtyard. The hotel is proposed to include 198 rooms and 14,390 square feet of lobby/check-in space, and hotel amenities and operations space. Hotel amenities and operations space may include business and service offices, maintenance storage, food services and meeting rooms. Amenities associated with the hotel may include office and personal services such as real estate sales, reservations, beauty salon, and child care facilities. Additional amenities may include meeting/conference rooms, a pool/spa/fitness area, and a public plaza.

The proposed density for Site 1 would be approximately 110 rooms per acre (“RPA”), which exceeds the maximum allowed density of 55 RPA, and 48 RPA aggregate density for the Resort General zoning within the Specific Plan.

Affordable Housing

Site 1 proposed development would require approximately 13,448 square feet of affordable housing (approximately 27 rooms)¹ for up to 54 full-time employee equivalents (“FTEE”).² The required affordable housing would be provided off site and as such is not included in the density calculation described above.

Retail

Development on Site 1 would include 22,000 square feet of various retail businesses which may include a restaurant/bar and gift shops (e.g., clothing, books, specialty food, sporting goods, luxury items, etc.). Retail would front the public plaza and Minaret Road to the east. The public plaza space would include outdoor seating and landscaping features.

Site 1 Access and Parking

All vehicular access to the proposed hotel would be from Canyon Boulevard to the west. Primary pedestrian access to the hotel would be from Canyon Boulevard or through the pedestrian corner located diagonally east/west through the center of the site. The Site 1 hotel would surround a courtyard, while the proposed retail would be oriented around a public plaza. A proposed public plaza/pedestrian corridor

¹ Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 500 square feet of living space per affordable housing unit is required per 2 FTEE; therefore 13,448 square feet/500 square feet equals 26.9 rooms.

² Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 250 square feet of living space is required per one FTEE; therefore 13,448 square feet/250 square feet equals 53.8 FTEE.

with public art features would provide a link through the site to the existing North Village development and Gondola building. Crosswalks and sidewalks would facilitate pedestrian connection to Main Street, Lake Mary Road and Minaret Road.

Site 1 parking would include three surface hotel check-in parking spaces and two understructure parking levels with 238 spaces for a total of 241 on-site parking spaces. In addition, 13 off-site on-street retail parking spaces would be located along Lake Mary Road. Emergency vehicle staging space would be provided on the northwest and southeast portion of the site. On the southwest corner of the site, enclosed service vehicle loading space would be provided off the Canyon Boulevard access point. Overall Project circulation and access is discussed in more detail below, and in Section IV.M (Traffic/Circulation) of this Draft EIR.

Site 1 Demolition and Construction

As previously stated, the development of Site 1 would require the demolition of existing structures. These include the old Inyo Mono Title building and accessory garage, possibly the operating Whiskey Creek Restaurant³ and the paved surface parking. If it is determined that the existing Whiskey Creek Restaurant could be remodeled, it would remain in its current location and would be redesigned to be more space-efficient.

³ *It is currently undetermined if the restaurant would be demolished, and the Project does not propose to remove the restaurant.*

Site 2 (Church Site)

Site 2 Location

Site 2 is located on the southwest corner of the Main Street-Lake Mary Road/Minaret Road intersection and comprises nine parcels (APN's 33-010-02 through -07, and 33-010-31 and -32). The site is also referred to as the "Church" site, due to the location of an existing church building.

Site 2 comprises a total of approximately five acres, of which approximately one acre is a vacated right-of-way. In addition to the vacant church, the site has seven existing buildings, including the North Village Inn, some office/retail and storage structures, and surface parking. All existing development would be demolished or relocated in order to construct a five-star hotel, hotel amenities and common areas, and retail facilities. Some of the planned hotel rooms along the borders of the site may be offered as permanent or fractional ownership residential units (refer to Figure III-6). Additionally, understructure parking and nine street parking spaces on Lake Mary Road would be available.

Site 2 Setbacks

Figure III-7 illustrates the proposed property line setbacks. The northwestern property line setback would be ten feet along Lake Mary Road; the eastern property line setback would be ten feet along Minaret Road; and the southern property line setback would be 25 feet. These proposed setbacks require modifications to existing setback requirements as currently allowed under the Specific Plan.

Site 2 Building Heights

Proposed development at Site 2 will involve multiple buildings with varying building heights (refer to Figure III-8). Height measurement standards are pursuant to proposed amended Specific Plan guidelines. Approximately 69 percent of the roof area exceeds the existing 50-foot maximum height requirement as set forth in the Specific Plan. The maximum building heights on Site 2 would be three proposed tower structures (130, 120 and 118 feet), each above the underside of parking garage ceiling (8,040 elevation). Proposed residential or hotel room development along the eastern property line fronting Minaret Road would not exceed 35 to 45 feet in height above natural grade (7,990-8,020 elevation). Proposed retail, hotel and hotel amenity (excluding the towers) at the northwestern property line along Lake Mary Road would not exceed 95 feet in height above underside of parking garage ceiling (8,025-8,045 elevation). Proposed hotel rooms, lobby and hotel amenities located in the south central portion of Site 2 (excluding the tower) would not exceed 108 feet in height above underside of parking garage ceiling (8,040 elevation). Proposed hotel rooms at the far western point of the site along Lake Mary Road would not exceed 94 feet above natural grade (8,045 elevation).

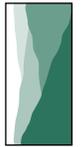
Table III-3 illustrates the specific land uses for Site 3; these land uses are described in further detail below.

**Table III-3
Site 2 Proposed Development Land Uses**

Development Areas	Square Feet
Residential Areas	
364 Condominium/Hotel Rooms	217,750
Affordable Housing Units ⁽¹⁾	22,418
Total Condominium/Hotel/Residential Area	238,250
Non-Residential Areas	
Hotel Amenities and Operations	
Pool/Spa	1,500
Conference	3,000
Restaurant/Bar Area Within Hotel	4,500
General Use Areas ⁽²⁾	15,640
<i>Total Hotel Amenities and Operations</i>	<i>24,640</i>
Retail	
Restaurant/Bar Area Outside Hotel	4,625
General Use Areas ⁽²⁾	13,875
<i>Total Retail Area</i>	<i>18,500</i>
Total Non-Residential Areas	43,140⁽³⁾
Parking ⁽⁴⁾	
3 Surface Parking Spaces	
327 Understructure Parking Spaces	
Notes:	
(1) Up to 45 affordable housing one-bedroom units would be provided on site.	
(2) General use areas can include office space, maintenance facilities, service areas, check-in lobby area, meeting rooms, fitness center, gift shop, clothing, etc.	
(3) Specific square footage numbers listed are estimated and serve to study a maximum non-residential square footage of 43,140 square feet.	
(4) Parking would include 330 on-site spaces and an additional 9 off-site on-street spaces along Lake Mary Road. Site 2 parking would be compliant with Town Municipal Code.	
Source: Mammoth Crossing Ventures, LLC (May 2008).	



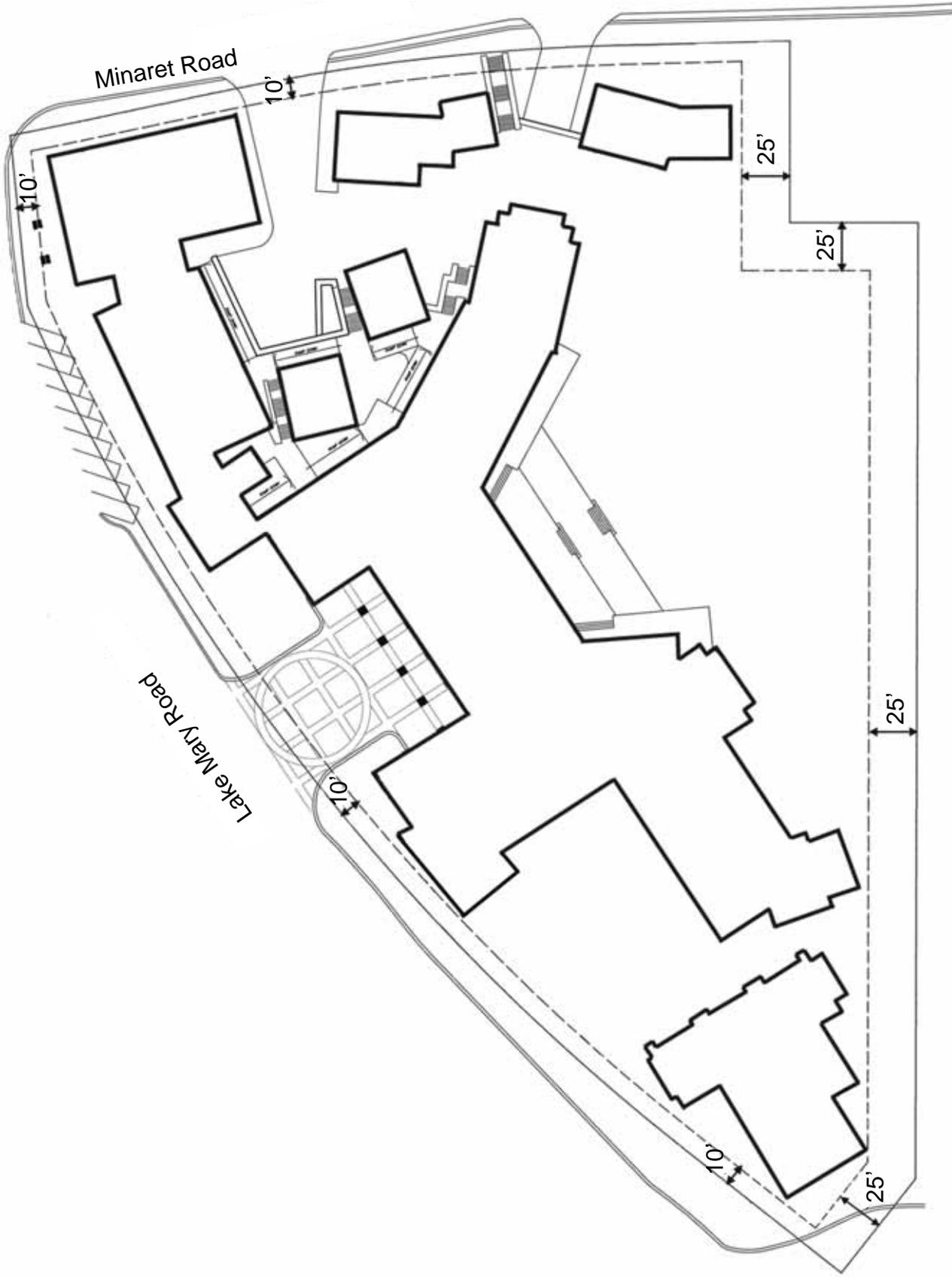
Source: Merrick Architecture, July 2008.



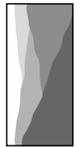
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Figure III-6
Site 2 Development Area



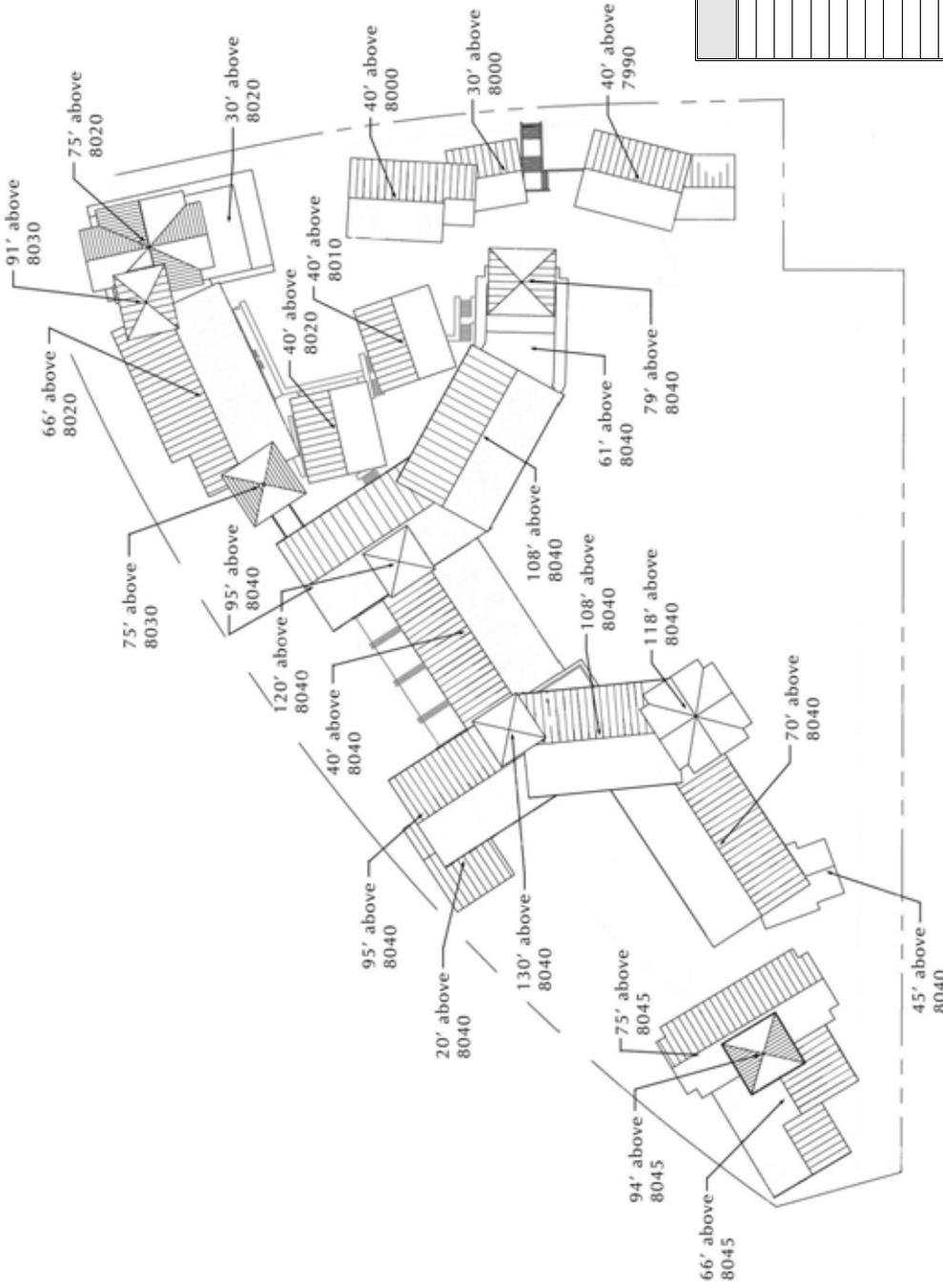
Source: Merrick Architecture, July 2008.



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Figure III-7
Site 2 Property Line Setbacks



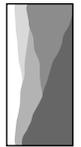
Roof Height Distribution on Site 2

Roof Height (Feet)	Roof Area	Percentage ⁽¹⁾	Percentage of Site ⁽²⁾
0'	127,043	0.00%	65.52%
20'	1,200	2%	61%
30'	3,390	5%	1.72%
40'	16,010	23%	8.13%
45'	970	1%	0.49%
61'	1,200	2%	0.61%
66'	9,760	14%	4.96%
70'	5,720	8%	2.90%
75'	7,610	11%	3.86%
79'	1,370	2%	0.70%
91'	1,070	1%	0.54%
94'	1,150	2%	0.58%
95'	7,520	11%	3.82%
108'	8,780	13%	4.46%
118'	2,360	3%	1.20%
120'	880	1%	0.45%
130'	880	1%	0.45%
Total Building Area Square Footage	69,870	100%	36%
Total Square Footage of Site	196,913⁽³⁾	--	100%

Notes:
 (1) Percentage of building is calculated by the square footage of the building area at given height/total building area square footage (69,870).
 (2) Percentage of site is calculated by the square footage of building area at given height/total square footage of site (196,961).
 (3) Site 1 square footage is calculated by Site 1 acreage (4.5205) multiplied by square feet per acre (43,560).
 (4) A total of 48,300 square footage of roof height is over 50 feet.
 (5) 69 percent of Site 2 is over 50 feet.

Note: Elevation numbers represent underside of parking garage ceiling.

Source: Merrick Architecture, July 2008.



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Figure III-8
Site 2 Height Analysis

Site 2 Proposed Development Land Uses

Hotel

The Site 2 hotel is proposed by the applicant to be designed as a five-star rated accommodation. The hotel would be located to the southwest of the site's proposed retail area; both the hotel and the retail (discussed below) would front Lake Mary Road. The hotel would include 364 rooms and 24,640 square feet of lobby/check-in space, hotel operations space and may include other amenities. Hotel operations space may include business and service offices, maintenance storage, food services and meeting rooms. Amenities associated with the hotel may include office and personal services, such as real estate sales, reservations, beauty salon, and child care facilities. Additional amenities may include a restaurant/bar, meeting/conference rooms, and a pool/spa/fitness area. A terraced patio would be situated to the south of the hotel building and the area located further to the south would remain in the natural forest setting.

The proposed density for Site 2 would amount to 81 rooms per acre ("RPA"), which exceeds the existing maximum allowed density of 48 RPA for the Specialty Lodging zoning within the Specific Plan.

Residential

A portion of the hotel rooms may include up to 24 two-bedroom condominium units in a stand-alone building at the southwestern property line fronting Minaret Road or at the far western portion of the site along Lake Mary Road or at both. These condominium units would accommodate permanent year-round residents and these non-employee housing units may be sold as fractional ownership units.

Affordable Housing

Site 2 would provide approximately 22,418 square feet of required affordable housing (up to 45 rooms)⁴ on site for up to 90 full-time employee equivalents (FTEEs).⁵

Retail

Development on Site 2 would include up to 18,500 square feet of various retail businesses which may include a restaurant/bar and gift shops (e.g., clothing, books, specialty food, etc.). Visitor-serving retail would be to the northeast of the hotel fronting Lake Mary Road.

⁴ Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 500 square feet of living space per affordable housing unit is required per 2 FTEE; therefore 22,418 square feet/500 square feet equals 44.8 rooms

⁵ Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 250 square feet of living space is required per one FTEE; therefore 22,418 square feet/250 square feet equals 89.7 FTEE.

Site 2 Access and Parking

The hotel and retail features located on Site 2 would be accessed by vehicles from Lake Mary Road to the north and with two entrance/exit points off of Minaret Road to the east. Pedestrian access to and from the site would be facilitated by proposed and existing crosswalks on Lake Mary Road, and two crosswalks on Minaret Road to connect east to Main Street and north to the Village. In addition, a pedestrian corridor would be provided diagonally through the retail area across the northeastern corner of the site.

Site 2 parking would include three surface hotel check-in parking spaces and three understructure parking levels with 327 spaces for a total of 330 on-site parking spaces. In addition, nine off-site on-street retail parking spaces would be located along Lake Mary Road. Emergency vehicle staging space would be provided in several locations on the eastern portion of Site 2 off Minaret Road, and on the far western part of the site of Lake Mary Road. Enclosed service vehicle loading space would be provided off the northern Minaret Road access point and understructure service vehicle loading space would be provided off the southern Minaret Road access point. Overall Project circulation and access is discussed in more detail below and in Section IV.M, Traffic and Circulation, of this Draft EIR.

Site 2 Demolition and Construction

As previously stated, the development of Site 2 would require the demolition or relocation of all existing structures. These include the North Village Inn, some office/retail and storage structures, surface parking and the church. The older buildings on site will be made available to groups who wish to move them off site.

Site 3 (Ullr Lodge/White Stag Inn)

Site 3 Location

Site 3 is located on the southeast corner of Main Street-Lake Mary Road/Minaret Road intersection and consists of APN's 33-100-14 through -18; comprising a total of approximately three acres. Site 3 is also known as the "Ullr Lodge/White Stag Inn" site due to the location of these two hotels/lodges on the site. Both the Ullr Lodge and the White Stag Inn have surface parking areas and several small accessory structures on site. All structures on this site would be demolished or removed in order to develop a family-oriented hotel, hotel amenity and common areas, and employee housing (refer to Figure III-9). In addition, understructure parking would be constructed.

Site 3 Setbacks

Figure III-10 illustrates the proposed property line setbacks for Site 3. The northern property line setback along Main Street would be 10 to 13 feet; the eastern property line setback would be 24 feet; and the southern property line setback would be 48 feet to accommodate an undeveloped right-of-way recently reserved by the Town as part of a separate project approval. The right-of-way is not proposed as part of this Project. The western property line setback would be 12 feet; however, entry stair landings extend into the setback area along Minaret Road. These proposed setbacks require modifications to existing setback requirements as currently allowed under the Specific Plan.

Site 3 Building Heights

Proposed development at Site 3 will involve multiple buildings with varying building heights (refer to Figure III-11). Height measurement standards are pursuant to proposed amended Specific Plan guidelines. Approximately 100 percent of the roof area exceeds the existing 50-foot maximum height requirement as set forth in the Specific Plan. The topography of the site, which includes a steep drop-off south of Main Street, means that the building area would be located below the street elevation along most of the site's Main Street-State Route 203 and Minaret Road frontage. The maximum heights of any building on Site 3 would be three proposed tower structures; one located at the northeastern portion of the site, at 70 feet above the underside of the garage ceiling (7,990 elevation) one located in the north central portion of the site, at 75 feet above underside of parking garage ceiling (8,000 elevation), and the other located at the northwestern corner of the site, at 85 feet above underside of parking garage ceiling (8,000 elevation). Proposed employee housing and hotel suites at the northern property line along Main Street would not exceed 60 feet in height above natural grade (7,990 elevation). The portion of the hotel at the western property line along Minaret Road would not exceed 65 feet in height (the tower) above underside of parking garage ceiling (8,000 elevation) and averages from 50 to 55 feet. The proposed hotel located at the southern property line along the proposed new roadway would not exceed 85 feet in height above underside of parking garage ceiling (8,000 elevation).

Table III-4 illustrates the specific land uses for Site 3; these land uses are described in further detail below.

**Table III-4
Site 3 Proposed Development Land Uses**

Development Areas	Square Feet
Residential Areas	
180 Condominium/Hotel Rooms	120,150
Affordable Housing Units ⁽¹⁾	10,125
Total Residential Area	130,175
Non-Residential Areas	
Hotel Amenities and Operations	
Pool/Spa	1,500
Conference	3,000
Restaurant/Bar Area Within Hotel	4,500
General Use Areas ⁽²⁾	21,120
Total Non-Residential Areas	30,120⁽³⁾
Parking⁽⁴⁾	
3 Surface Parking Spaces	
146 Understructure Project Parking Spaces	
100 Understructure Public Parking Garage (Town of Mammoth Lakes)	
<p>Notes:</p> <p>(1) Up to 21 affordable housing one-bedroom units would be provided on site for hotel employees.</p> <p>(2) General use areas can include office space, maintenance facilities, service areas, check-in lobby area, meeting rooms, fitness center, gift shop, clothing, etc.</p> <p>(3) Specific square footage numbers listed are estimated and serve to study a maximum non-residential square footage of 24,170 square feet.</p> <p>(4) Parking would provide on-site spaces including 149 Project parking spaces and 100 public parking spaces required by the Town of Mammoth Lakes as a community benefit. Site 3 parking would be compliant with Town Municipal Code.</p> <p>Source: Mammoth Crossing Ventures, LLC (May 2008).</p>	

MAIN ST. (HWY 203)

*PEDESTRIAN BRIDGE
CONNECTING MAIN ST.
TO EMP. HOUSING TO
BE DEVELOPED AT
TTM/USE PERMIT STAGE

EMPLOYEE
HOUSING
HOTEL

HOTEL AMENITY
W/ HOTEL ABOVE

PUBLIC
PLAZA

AMENITY W/
HOTEL ABOVE

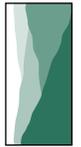
HOTEL ABOVE

AMENITY
W/ HOTEL
ABOVE

ARRIVAL
PLAZA

MINARET ROAD

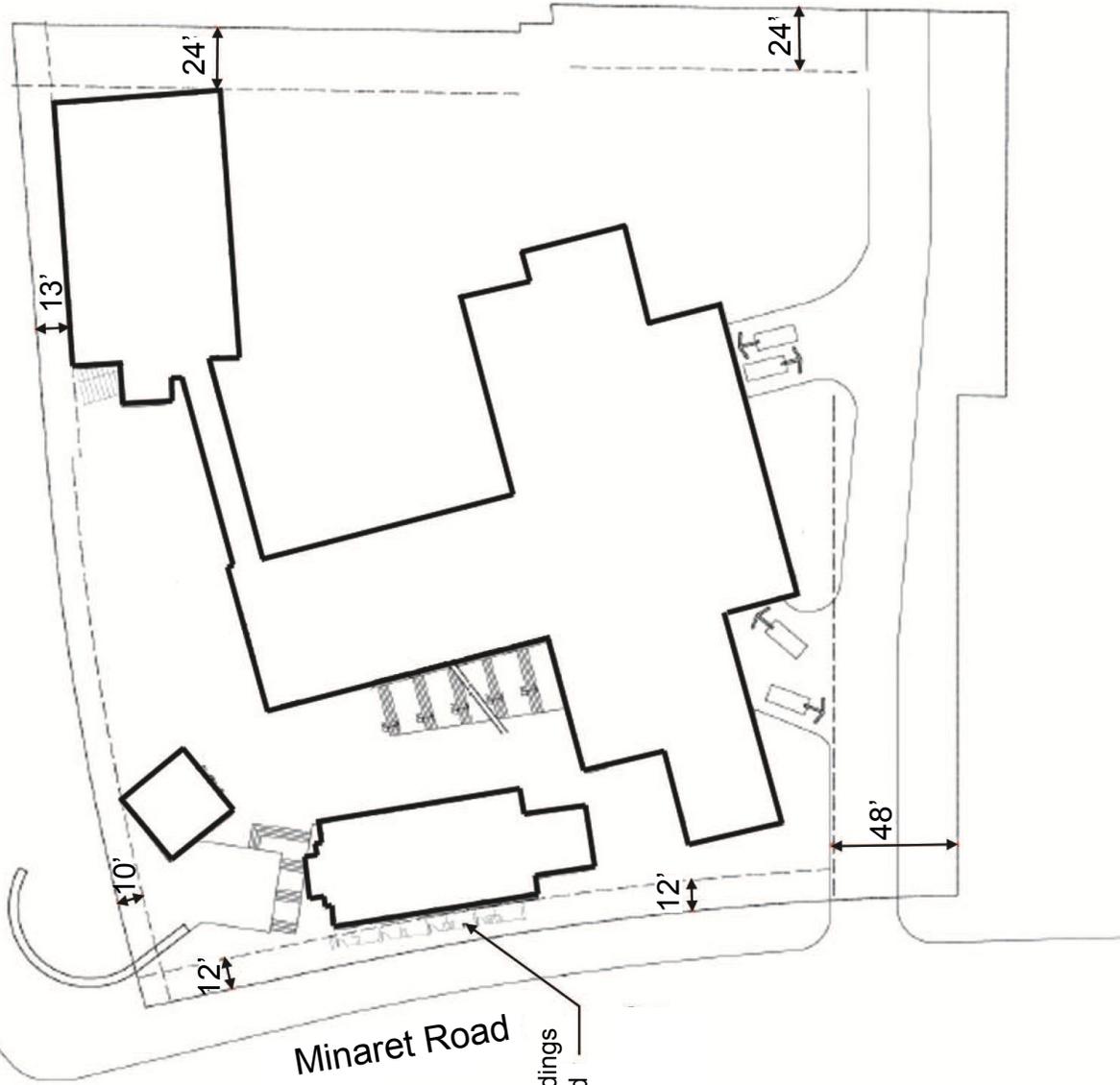
Source: Merrick Architecture, July 2007.



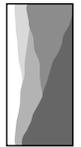
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Figure III-9
Site 3 Development Area



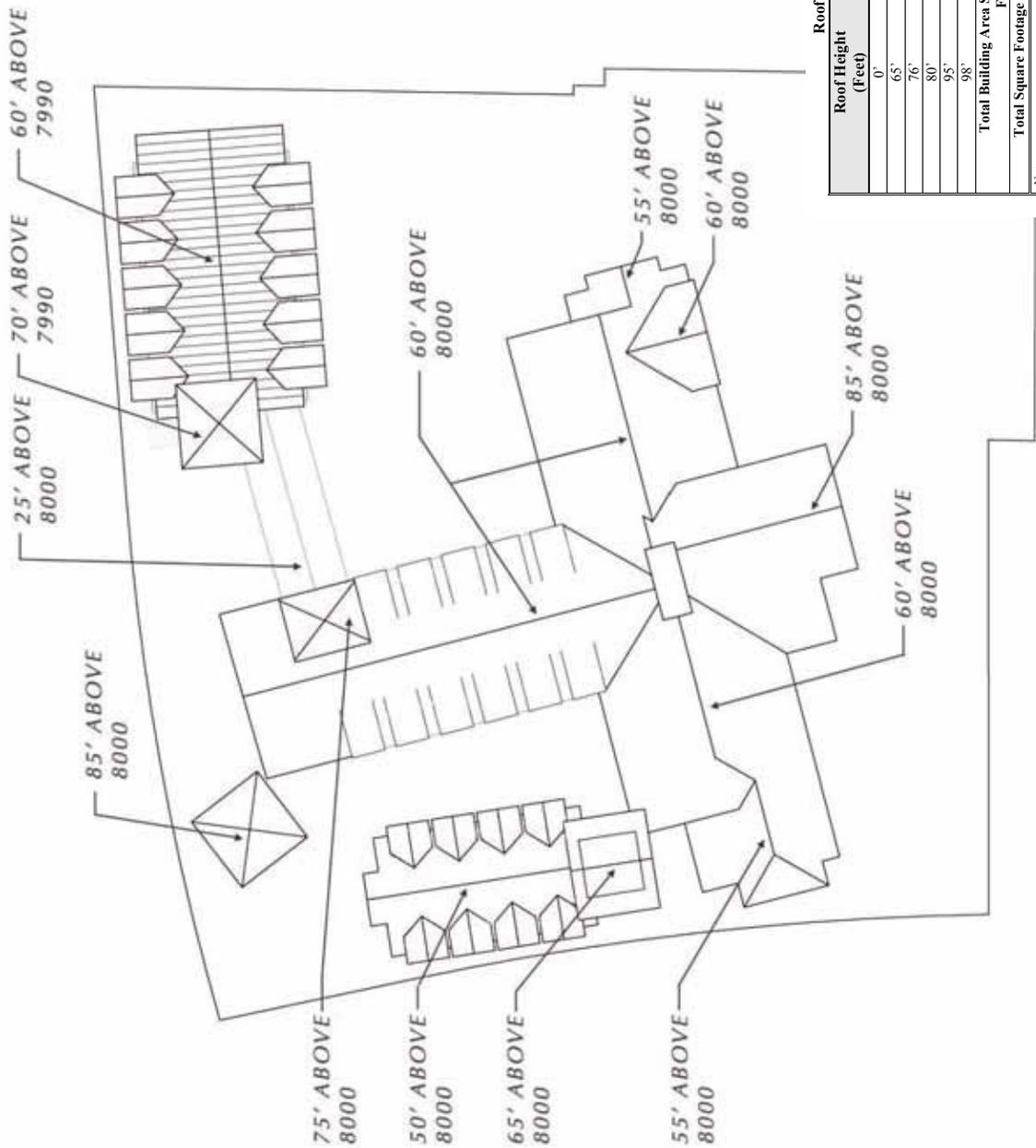
Source: Merrick Architecture, July 2008.



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Figure III-10
 Site 3 Property Line Setbacks



Roof Height Distribution on Site 3

Roof Height (Feet)	Roof Area	Percentage ⁽¹⁾	Percentage of Site ⁽²⁾
0'	67,634	0.00%	52.40%
65'	6,280	10%	4.87%
76'	33,170	54%	25.70%
80'	8,480	14%	6.57%
95'	1,150	2%	0.89%
98'	12,350	20%	9.57%
Total Building Area Square Footage	61,430	100%	48%
Total Square Footage of Site	129,064⁽³⁾	--	100%

Notes:

- (1) Percentage of building is calculated by the square footage of the building area at given height/total building area square footage (61,430).
- (2) Percentage of site is calculated by the square footage of building area at given height/total square footage of site (129,064).
- (3) Site 1 square footage is calculated by Site 1 acreage (2.9629) multiplied by square feet per acre (43,560).
- (4) A total of 61,430 square footage of roof height is over 50 feet.
- (5) 100 percent of Site 2 is over 50 feet.

Note: Elevation numbers represent underside of parking garage ceiling.

Source: Merrick Architecture, July 2007.



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Site 3 Proposed Development Land Uses

Hotel

The family-style hotel would be located fronting an entry courtyard and short-term parking area north of a new undeveloped street right-of-way⁶ connecting to Minaret Road along the southern end of Site 3. The hotel is proposed to include 180 rooms with 30,120 square feet of lobby/check-in space, hotel operations space and may include amenities. Amenities associated with the hotel may include a courtyard common area, a restaurant/bar, a meeting/conference room, and a pool/spa/fitness area. The proposed density for Site 3 would amount to 61 rooms per acre (“RPA”), which exceeds the existing maximum allowed density of 48 RPA for the Specialty Lodging zoning within the Specific Plan.

Affordable Housing

Site 3 would provide approximately 10,125 square feet of required affordable housing (approximately 21 rooms)⁷ on site for up to 40.5 full-time employee equivalents (“FTEEs”).⁸ These condominium units would accommodate employee housing and would be located on the bottom floors of the northeastern wing of the hotel.

Site 3 Access and Parking

A new public road right-of-way⁹ has been reserved and would be developed from Minaret Road, extending eastward at the southern end of Site 3, adjacent to the Sierra Star Golf Course. Site 3 would be accessible from two points off the new road. A proposed pedestrian/bicycle corridor would link the site to the existing path along the portion of the Sierra Star Golf Course located southeast of the site, potentially linking the site to the Main Street corridor and the central Mammoth Lakes’ area.

With the exception of three hotel check-in parking spaces, all parking would be located in two understructure levels. The Project would provide 149 required parking spaces for the Project and 100

⁶ *The new street right-of-way was required and approved by the Town in spring of 2007 as part of the Lodestar/Tanavista TTM and UPA located on the parcel directly to the south of Site 3. The street is not proposed as part of this Project.*

⁷ *Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 500 square feet of living space per affordable housing unit is required per 2 FTEE; therefore 10,125 square feet/500 square feet equals 20.3 rooms.*

⁸ *Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 250 square feet of living space is required per one FTEE; therefore 10,125 square feet/250 square feet equals 40.5 FTEE.*

⁹ *The new street right-of-way was required and approved by the Town in spring of 2007 as part of the Lodestar/Tanavista Tentative Tract Map (TTM) and Use Permit Application (UPA) located on the parcel directly to the south of Site 3. The street is not proposed as part of this Project. This street is commonly referred to as 7B Road.*

public parking spaces for a total of 249 on-site parking spaces. Emergency vehicle staging space is provided on the southeast portion of the site. Understructure service vehicle loading space is provided off the new road access point. Overall Project circulation and access is discussed in more detail below and in Section IV.M, Traffic and Circulation), of this Draft EIR.

Site 3 Demolition and Construction

As previously stated, the development of Site 3 would require the demolition or removal of existing vacant structures. These include the Ullr Lodge, the White Stag Inn, paved surface parking areas, and small accessory structures.

Site 4 (Lodestar Parcel)

Location

Site 4 is located on Minaret Road south of Site 3 and southeast of the Main Street-Lake Mary Road/Minaret Road intersection. The site is on APN 33-330-47 and consists of 1.3 acres.

Site 4 is currently in the *Lodestar Master Plan* area. The applicant is requesting a boundary change to the Specific Plan to incorporate the Site 4 parcel into the Specific Plan area. The original *Lodestar Master Plan* (“LMP”), adopted in 1991, encompasses an area of approximately 226 acres around the Sierra Star Golf Course.¹⁰ A project to construct 45 Residential Condominiums (consistent with the LMP’s allowed maximum density of 33 units¹¹ per acre) was approved by the Town of Mammoth Lakes in February 2007 (Tentative Tract Map [“TTM”] 36-240, Use Permit Application [“UPA”] 2006-08). A Mitigated Negative Declaration was prepared and adopted by the Town for the project at the same time. Due to construction estimates, the building permit application was withdrawn and as of October 2007, there are currently no plans to develop Site 4 as approved although the TTM and UPA remain current. The applicant proposes to leave the zoning parameters on Site 4 as they are approved in the February 2007 *Lodestar Master Plan* amendment and District Zoning Amendment (“DZA” 2006-02). Any development that would occur on this site has been previously analyzed in the Mitigated Negative Declaration prepared in February 2007 by the Town, and in the Environmental Impact Report for the *Lodestar Master Plan*, prepared by EIP Associates, and certified by the Town in February 1991 (SCH#90020042).

¹⁰ *A series of amendments were recently proposed to the Lodestar Master Plan which include redesignating a series of Lodestar Master Plan sub-areas to be part of a new Master Plan, the Sierra Star Master Plan. Other areas, including Site 4, remain part of the LMP and subject to its regulations.*

¹¹ *Note that under the Specific Plan density is calculated by rooms per acre and not units per acre.*

Image and Character

According to the Project Applicant, the Project is intended to define three corners of the Main Street-Lake Mary Road/Minaret Road intersection in a way that will create a sense of arrival for the North Village area. The Project would be anchored by distinctive design consistent with design guidelines set for in the *North Village Specific Plan* (“Specific Plan”). Landmark architecture, public art, pedestrian oriented retail plazas and public space are intended to enhance and invigorate the core Specific Plan area. Through the development of the Project, the Specific Plan area would be aided to complete its role as a major visitor-oriented lodging, retail and entertainment district, animated by diverse shopping opportunities, short-term accommodations and cultural and entertainment venues.

The applicant intends to develop the Project with a mix of uses, located and positioned to best enhance the visitor experience and preserve Mammoth Lakes’ character of a village in the forest. Major public places and retail uses would generally be located on the ground level with visual access from streets and includes pedestrian linkage corridors. Most hotel accommodations would be located on upper floors. The nature and location of ground level shops would vary. Buildings and structures would be detailed to provide a scale and texture of development design appropriate to Mammoth Lakes, with public space supportive of and contributing to a distinctive sense of place.

Building Design

Form, Mass and Scale

The Project would aim to organize the form and mass of each of its proposed buildings relative to the scale of neighboring buildings and the surrounding tree-canopy to the extent possible. The three hotels, as previously described, would exceed the maximum 50-foot height limit and would constitute a substantial intensification of building mass and increase in heights relative to existing development on each of the sites. The proposed building massing and heights would be varied and building ends would be stepped to compensate for the intensification of building mass and height.

Project design would be intended to conform with requirements of the Specific Plan, as well as the *Town of Mammoth Lakes Design Guidelines*, and new design or development standards adopted as part of the proposed Specific Plan amendment, applicable to the proposed Mammoth Crossing District. The Project’s proposed architecture on each site and overall site planning would be intended to be complementary. Landscaping, public space, and pedestrian access and connectivity would be emphasized throughout the Project. Pedestrians and vehicles would be separated as much as possible for safety and convenience. As previously described, modifications to existing setback requirements as currently allowed under the Specific Plan are necessary to build the Project as proposed. Setback amendments are proposed as part of the Project.

The Project is designed to meet the overall intent of the Specific Plan and the General Plan, which is to facilitate the development of the area as a concentrated, pedestrian-oriented activity center with limited

vehicular access. The Specific Plan area is adjacent to the base of the Mammoth Mountain Ski Area, a major winter and summer recreational destination. Development in the Specific Plan area is intended to be oriented toward year-round activity, and the strengthening of winter visitor activity. Architectural, signage and landscaping guidelines are included in the Specific Plan and, as such, will be incorporated into the Project.

Public Space

A key concept of the Project is to provide pedestrian connectivity within the Specific Plan area and to facilitate walking and bike use. As such, building forms have been arranged to provide pedestrian access through the Project sites and to provide gathering spaces within open courtyards and a public plaza. The Project's placement of sidewalks, trails, and paths, and public plazas would aim to connect the hotels and residents with the Town core as well as with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and trails. Pursuant to Specific Plan and *Town of Mammoth Lakes Design Guidelines*, trails and sidewalks would be appropriately landscaped. Pedestrian and bicycle circulation are discussed in more detail below.

Recreation

The Project is designed to enhance and complement recreational amenities already available in the Town, specifically as provided for in the *North Village Specific Plan* area. The Project would act as a link to provide pedestrian and bicycle connectivity from the North Village area to the Town core via trails and crosswalks. The Project would provide guests of the hotel with access to hotel amenities as previously described. Recreation features associated with the Project's three hotels may include swimming pools, bicycles, spa facilities and fitness areas. Residents of the on-site condominiums and affordable housing units would be provided common open space and recreational amenities consistent with Town Municipal Code requirements.

Conversion of Existing Residential Facilities

Eighteen residential units are located within the existing North Village Inn located on Site 2 and would be removed as part of the planned improvements. There are no existing residential units located on Site 1 or Site 3. Removal of existing on-site housing would result in a decrease of housing units, necessitating the construction of replacement housing. The Project Applicant would be required to submit an Existing Supply Report ("ESR") pursuant to Town Municipal Code 17.52 "Conversion of Existing Residential Facilities." The ESR is intended to describe the existing housing and stipulate the conditions for which the housing is to be replaced. The ESR is required to be submitted and approved prior to the issuance of building permits by the Town. The Project Applicant would also be required to submit: a Facilities Report detailing the condition and estimated useful life of all elements of the existing buildings and other structures involved in the Project, a Building History Report, an Existing Tenancy Report, and a Development Plan. Refer to Section IV.K, Population and Housing, of this Draft EIR, for a more detailed description of these required reports. In addition, all requirements pursuant to Town Municipal Code

17.36 “Housing” shall apply to conversions of existing rental properties to other uses or to a condominium form of ownership.

Affordable Housing

Site 1 would provide approximately 13,448 square feet of required affordable housing (up to 27 rooms) for up to 54 full-time employee equivalents (“FTEEs”).¹² The required affordable housing would be provided off-site and as such, is not included in the calculation of development quantities for the Project described above. Site 2 would provide approximately 22,418 square feet of required affordable housing (up to 45 rooms) on site for up to 90 FTEEs.¹³ Site 3 would provide approximately 10,125 square feet of required affordable housing (approximately 21 rooms) on site for up to 40.5 FTEEs.¹⁴ This issue is discussed in further detail in Section IV.K, Population and Housing, of this Draft EIR.

Infrastructure

Roadways

The existing roadways that serve the Project site are Main Street, Lake Mary Road, Minaret Road and Canyon Boulevard. State Route 203 (“SR 203”) continues through the Town on Main Street and on Minaret Road north of the Main Street-Lake Mary Road/Minaret Road intersection. The Project proposes various improvements to these roadways. Two lanes in each direction would be maintained on Lake Mary Road and a center median to provide left-turn stacking in both directions would also be provided. Traffic signals at the intersections with Minaret Road and Canyon Road are proposed to remain. A fourth lane will be added to the Canyon Boulevard intersection to serve as an access to Site 2. No additional improvements are planned for Canyon Boulevard and/or Minaret Road. As previously mentioned, a new paved public road (referred to as 7B Road) would be constructed off of Minaret Road at the southern end of Site 3 adjacent to the Sierra Star Golf Course. This new road is part of a previous project approval and is not proposed as part of this Project.¹⁵ Although this roadway is not necessitated by the Project, nor does the Project have the ability to control the design, construction and maintenance of this road, the Project Applicant is supportive of the Town’s goals of increased connectivity, and is willing to make

¹² Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 500 square feet of living space per affordable housing unit is required per 2 FTEE and a minimum of 250 square feet of living space is required per one FTEE.

¹³ Ibid.

¹⁴ Pursuant to Town Municipal Code 17.36.030(C) Housing Requirements a minimum of 500 square feet of living space per affordable housing unit is required per 2 FTEE and a minimum of 250 square feet of living space is required per one FTEE.

¹⁵ The new street right-of-way was required and approved by the Town in spring of 2007 as part of the Lodestar/Tanavista Tentative Tract Map (TTM) and Use Permit Application (UPA) located on the parcel directly to the south of Site 3. The street is not proposed as part of this Project. This street is commonly referred to as 7B Road.

provisions for the Site 3 access road to ultimately connect to a future road across Sierra Star, to the extent that timing and other factors make this feasible. All Site 3 buildings would be serviced from internal driveways accessed from the proposed new 7B Road. Internal driveways, parking areas, service vehicle loading areas and emergency vehicle staging space would be privately owned and maintained. Project circulation and access is discussed in more detail in Section IV.M, Traffic and Circulation, of this Draft EIR.

Overall Vehicular Circulation and Parking Systems

Figure III-12 illustrates the vehicular movements and access points for the Project's four locations. Details of the proposed access locations are as follows:

- Site 1 – Access would be off of Canyon Boulevard. This access point would provide for all turn movements into and out of the site.
- Site 2 – Access would be provided off of Lake Mary Road. This access would provide for all turn movements on Lake Mary Road. Two access points would be off of Minaret Road. The most southerly access point would provide for all turn movements while the northerly access would be restricted to right turns in and out only.
- Site 3 – Access would be provided off of Minaret Road to the new road. As stated previously, the new road is part of a previous project approval and not proposed as part of this Project. This access point would provide for all turn movements into and out of the site.
- Site 4 – No new access points are currently proposed for Site 4. There is an existing access point on the southern portion of Site 4 off of Minaret Road.

Short-term surface parking would be provided adjacent to the check-in locations; guests would be directed to understructure parking structures located beneath the hotel buildings for parking during the duration of their stay. Additional proposed short-term parking includes passenger drop off and loading spaces within each site, on-street and understructure spaces to serve proposed retail uses on Site 1 and Site 2, and spaces for service and delivery vehicles. Tour bus parking, loading and unloading would be accommodated on Sites 2 and 3. Connections would be provided from surface parking lots to internal walkways and pedestrian circulation areas (such as plazas and pedestrian, bicycle and trail facilities).

Service Vehicles

Service vehicles would be routed and managed with the intent of minimizing conflicts with the Project's visitor activities and uses, pedestrian uses and circulation, and local traffic. For Site 1 all buildings would be serviced from internal driveways on Canyon Boulevard, for Site 2 from Minaret Road, and for Site 3 from the proposed new road. Space for short-term service parking in centralized service bays will be provided for each site (see site specific details above). Each hotel would have designated central facilities to accommodate service delivery and waste management. All vehicles would share common entries to reduce curb cuts and driveways. Service areas would be designed to accommodate required service

vehicle sizes (refer to Figure III-13). The Project Applicant would be required to submit a Service Delivery Management Plan (“SDMP”) for approval by the Town. The SDMP is required to be submitted and approved prior to the issuance of building permits by the Town.

Pedestrian and Bicycle Circulation System

Existing safe pedestrian activated signal crossings for pedestrians are at the Main Street-Lake Mary Road/Minaret intersection and at the Lake Mary Road/Canyon Boulevard intersection. Two additional crosswalks would be added on Minaret Road at the new roadway intersection to link Site 2 with Site 3. Pedestrian and bicycle linkage from the Sierra Star Golf Course area and Main Street town core to the North Village would be provided on Site 3. The pedestrian and bicycle connections from Site 3 would connect to adjacent trails either existing or proposed.

Figure III-14 and Figure III-15 illustrate the pedestrian and bike path network, respectively. As shown on these figures, the pedestrian pathways would include interior sidewalks fronting the hotels, public plazas, and retail, while the proposed bicycle system is restricted to the borders of the Project sites. Prohibiting bicycle riding throughout the interior of the Project sites is a safety design feature. However, bicycles can be walked throughout the Project sites and bicycle facilities would be provided on each Project site for hotel guests, visitors and residents. Bicycle facilities would include, but are not limited to, secure, covered bike parking/racks for a variety of bicycle sizes, lockers, and storage. Pedestrian connections to and from hotel areas would link the Project with the North Village and Gondola building, thus tying into the larger Town wide recreational trail network which includes pedestrian trails, bike lanes and sidewalks that are adjacent to major roadways such as Minaret Road, Main Street and Meridian Boulevard. Sidewalks and pathways on the Project’s development sites would be lit according to the Town’s Outdoor Lighting ordinance. All proposed pedestrian crossings, sidewalks, pathways, trails and bike lanes would be compliant with the standards provided in the Americans with Disabilities Act (“ADA”).

Emergency Vehicle Access & Staging Areas

As previously mentioned and illustrated in Figure III-12, primary points of vehicular access into the Project’s three proposed development sites would be from Canyon Boulevard for Site 1, Lake Mary Road and Minaret Road for Site 2, and Minaret Road and the new road for Site 3. No new access points are currently proposed for Site 4. Emergency vehicle access would be provided from these access points.

Emergency vehicle parking would be provided internally at an accessible location within each site. Figure III-16 illustrates the Project’s emergency vehicle staging areas and standpipe systems¹⁶ located

¹⁶ *A standpipe system is an arrangement of piping, valves, hose connections and allied equipment installed in a building or structure with the hose connections located in such a manner that water can be discharged in streams or spray patterns through attached hose and nozzles.*

within each site. Site 1 would have four emergency vehicle staging areas and two standpipe system locations. Site 2 would have six emergency vehicle staging areas and four standpipe system locations. Site 3 would have five emergency vehicle staging areas and four standpipe system locations.

Supplemental fire lanes would be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials to ensure adequacy for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle traffic. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in location accessible to fire equipment.

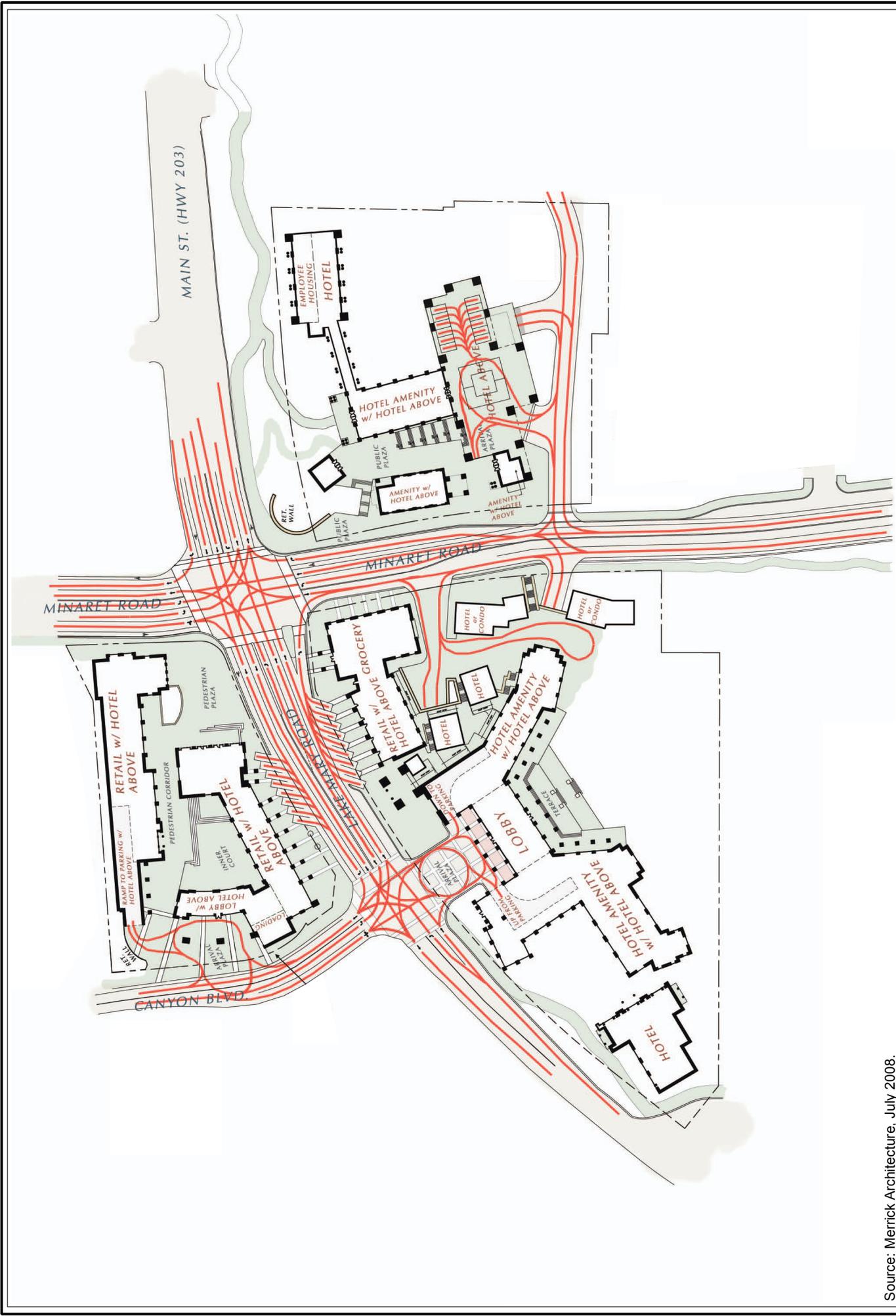
Bus/Shuttle Shelters

Currently, shuttle services operated by the Town of Mammoth Lakes and by Mammoth Mountain Ski Area provide year-round day and nighttime service to the North Village.¹⁷ All lines provide transfers to other lines at the North Village. The Project would not only use the existing bus/shuttle shelters located at the North Village, but also proposes additional transit stops pursuant to the Town's transit needs at the time of Project development. Additional transit stops could include a stop on Lake Mary Road just west of Minaret Road. In addition, all three Project hotels would provide their guests with exclusive shuttle service for destinations in Town as well as service to the Mammoth Yosemite Airport.

Snow Management

Snow management would be addressed with each building to ensure that residents and visitors are provided safe and convenient access to and from lodging and within the public use areas throughout the winter season. Ground and roof level snow storage areas would be provided on each of the three Project sites. Snow management would be designed in accordance with Town Municipal Code Chapter 12.16 "Snow Removal" regulations. The Project Applicant would be required to submit a Snow Management Plan ("SMP") for approval by the Town and the Mammoth Lakes Fire Protection District. Methods to prevent snow and ice build-up such as snowplowing, cinder application and installation of heat traced pavement on adjacent roadways (i.e., Lake Mary Road, Minaret Road and Main Street) which could result in hazardous driving conditions would be included in the SMP. The SMP is required to be submitted and approved prior to the issuance of building permits by the Town.

¹⁷ Town of Mammoth Lakes website, *Transportation Options*, <http://www.ci.mammoth-lakes.ca.us/transit/home.htm>, accessed by CAJA staff, December 12, 2007.



Source: Merrick Architecture, July 2008.

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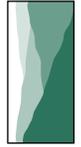
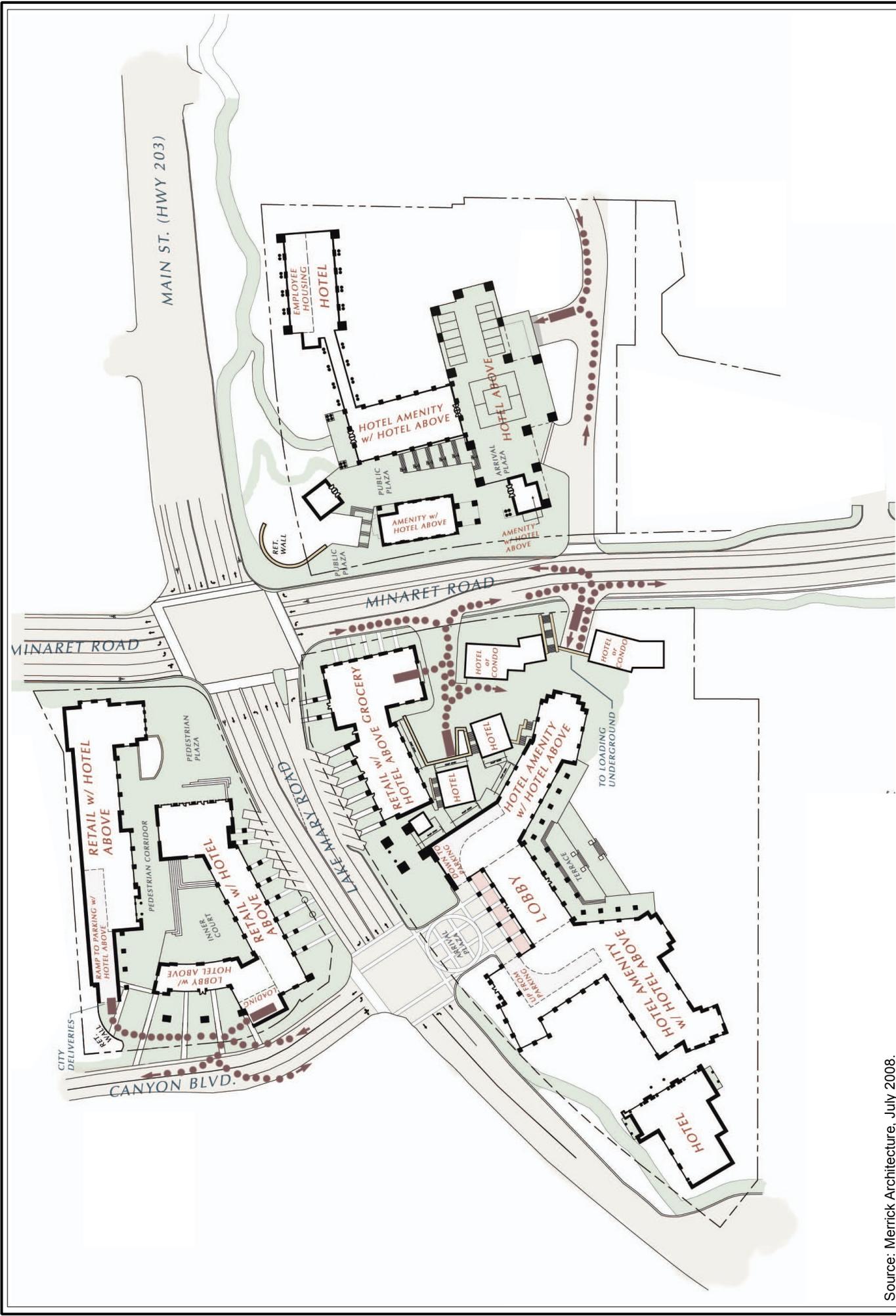
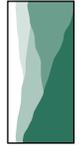


Figure III-12
 Vehicle Circulation Map



Source: Merrick Architecture, July 2008.

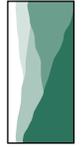


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Figure III-13
Service Vehicle & Loading Map



Source: Merrick Architecture, July 2008.



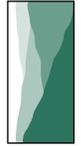
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Figure III-14
Pedestrian Circulation Map



- POTENTIAL STANDPIPE LOCATION
- ▨ FIRE TRUCK and STAGING AREA

Source: Merrick Architecture, July 2008.



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Figure III-16
Emergency Vehicle Access & Staging Area Map

Waste Management

The Project would be required to comply with municipal laws and regulations regarding provision of recycling collection rooms. The Project would include on-site solid waste storage, trash receptacles and recycling will be required to reduce the bulk of waste deposited in the Benton Crossing Landfill. The Project would be incorporated into the Town's recycling program in compliance with Assembly Bill 939 (The California Integrated Waste Management Act of 1989). All construction, demolition, and renovation projects in the Town are subject to the requirements of Town Ordinance No. 88-01 as codified in the Town's Municipal Code Chapter 15.08 "Construction Site" regulations. As stated therein, each permittee shall provide for the adequate removal and disposal of all construction debris.

Grading and Drainage

Grading would not be balanced on site. The proposed Project would require approximately 156,430 cubic yards of grading of which approximately 7,350 cubic yards would be excavation/embankment and approximately 149,080 cubic yards would be excavation/expansion would be cut and hauled to an off-site location. The Project would develop the grades and topographic forms needed to achieve necessary grades for siting buildings in relationship to utility extensions, roads, and pedestrian areas per the Specific Plan and the Town Municipal Code Chapter 12.08 "Land Clearing, Earthwork, and Drainage Facilities" requirements. The Project Applicant would be required to submit a Construction Management Plan ("CMP") for approval by the Town. The CMP would include the Haul Route for the removal of the grading materials. The approved Haul Route shall ensure that construction truck trips do not affect sensitive uses in the Project vicinity. The CMP is required to be submitted and approved prior to the issuance of building permits by the Town. The Project proposes approximately 266,660 square feet of impervious surfaces including 171,000 square feet of roof area and 95,650 square feet of pavement areas. The remaining area of the site (137,460 sf) is to be landscaped or left in a natural state. The Project will decrease the impervious surface for Site 1 by approximately 8 percent, and increase the impervious surface for Site 2 and 3 by 44 percent and 29 percent, respectively.

The Project's stormwater runoff and drainage conditions are similar to the existing conditions. Flows are conveyed through the Project sites to existing and proposed drainage facilities. Stormwater from the Project requires retention of the 20-year storm for one hour. New infiltration systems meeting this 20-year storm capacity would be installed for each site.

Landscape Design and Planting

Landscape site work would be consistent with traditional approaches for the region, and would address current needs, Town Municipal Code Chapter 17.38 “Water-Efficient Landscape” regulations, Chapter 17.16.050 “Grading and Clearing” regulations and environmental considerations. In addition, the Project Applicant would submit a Vegetative Hazard Management Plan (“VHMP”) for approval by the Mammoth Lakes Fire Protection District. The VHMP is required to be submitted prior to the issuance of building permits by the Town. Landscaping would be designed to enhance user experience, safety, and enjoyment. The Project would comply with the Development and Design Standards set forth in the *North Village Specific Plan* and the *Town of Mammoth Lakes Design Guidelines* as approved by the Planning Commission.

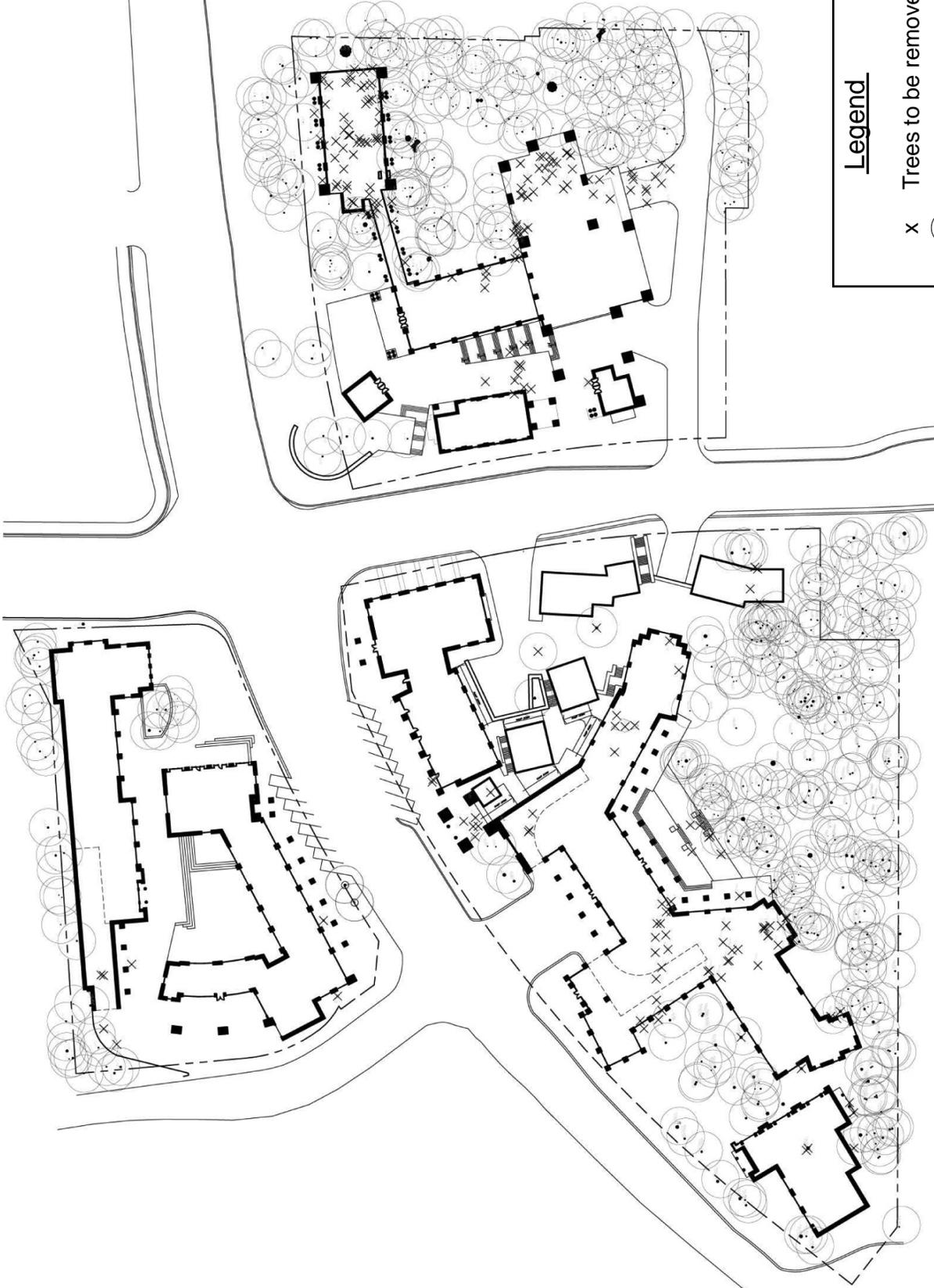
The overall style and landscape of all three sites would feature materials and forms associated with the Eastern Sierras and Mammoth Lakes area to enhance the natural beauty. The Project would appear to be nestled in the forest and would retain, and protect during construction activities, existing native trees where possible as illustrated on Figure III-17. As stated above, the Project would comply with Town Municipal Code Chapter 17.16.050 “Grading and Clearing” which requires the preservation of existing trees and vegetation.

Site 1 landscaping would preserve the majority of existing trees along the northern border to provide a forested transition between the proposed new development and the adjacent Fireside Condominiums. In addition, the majority of the existing trees throughout the proposed public plaza area and along the Lake Mary Road border would also be preserved. Site 1 would remove approximately five to ten existing trees.

Site 2 landscaping would preserve the majority of the existing trees along the southern border. Development on Site 2 would result in the removal of approximately 40 to 50 trees. The trees that would be removed are located on the northern portion of the site that is currently developed. The majority of trees that would remain would preserve the forested transition to the adjacent Hidden Valley Condominiums and Sierra Star Golf Course.

Site 3 landscaping would preserve the majority of trees along the western border to preserve the forested transition between adjacent Holiday Haus Inn and the Sierra Star Golf Course. Site 3 landscaping would remove approximately 80 to 100 trees.

Where new plantings are proposed, the Project would use native plants that are indigenous and adapted to the Mammoth Lakes region. New landscaping would be provided on all three sites throughout the pedestrian transition areas and public plazas.



Source: Merrick Architecture, May 2008.

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 Environmental Planning and Research



Figure III-17
 Tree Retention/Tree Removal Plan

Lighting

A detailed lighting plan for the Project's development shall be prepared for approval by the Planning Commission showing location, intensity, heights, fixture type and design, and any other pertinent information with the filing of future TTMs and UPAs. All construction-related lighting would be located and aimed away from adjacent residential areas and would consist of the minimal wattage necessary to provide safety at the construction site. A Construction Safety Lighting Plan would also be submitted to the Town for review concurrent with Grading Permit application. Lighting shall comply with the design guidelines established for Specific Plan and Town Municipal Code Chapter 17.34 "Outdoor Lighting" regulations. Lighting shall be provided for safety, security, and an attractive nighttime environment. The lighting needs at the Project site would vary according to the type and intensity of use. Varying illumination levels would be developed which address the particular needs of outdoor spaces and activities: safety, security, vehicular and pedestrian movement, retailing, signage, etc. Excessive illumination would be avoided and lighting would be designed and placed so as to minimize glare and reflection and to maintain 'dark skies.'

Phasing & Schedule

The Project has been organized so that it would be developed in several phases. Each phase would stand-alone and operate successfully as a complete entity. Development within each phase is intended to be coordinated with surrounding land uses, vehicular circulation, emergency access routes, and pedestrian bike and trail systems so that visitors are clearly guided and that there are logical transitions within the circulation network. During the construction period, there would be temporary construction fencing to screen most activities from surrounding uses. Most phases would last approximately 24 to 36 months. Some phases may be under construction simultaneously. All construction staging would occur within the Project boundaries. Construction activities are proposed to be complete by 2020.

C. PROJECT OBJECTIVES

The objectives of the Project are as follows:

- To create an intensely developed “Town Visitor Core” area and primary visitor oriented hub, with mixed uses proposed on the Town’s eastside locations,
- To complete the development within the North Village to fulfill its role as a major public place, animated by diverse shopping opportunities, short-term accommodations and entertainment venues.
- To create the economic synergy to allow a sustainable visitor core.
- To meet the overall intent of the *North Village Specific Plan*; which is to facilitate the development of the area as a concentrated, pedestrian-oriented activity center with limited vehicular access.
- To produce a development design that is appropriate to the character of the Mammoth Lakes region.
- To enhance the Town to be comparable to other high-quality mountain resort destinations in North America.
- To develop additional affordable housing and visitor accommodations.
- To provide bicycle and pedestrian trails connections to existing trails and other town-wide circulation systems, so as to complement and enhance the town-wide trails network.
- To provide development that is responsive to the existing and expected future hotel demand within the Town.

D. DISCRETIONARY ACTIONS

The Town of Mammoth Lakes is the Lead Agency for purposes of complying with CEQA and is the primary public agency responsible for approving projects on these properties. Several discretionary actions would be necessary for the Project, including, but not limited to:

- General Plan Amendment
- North Village Specific Plan Amendment
- Tentative Tract Map
- Use Permits (including design review)
- Building Permits
- Grading Permits

- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project

Additionally the Project will require redesignating the existing zone designations within the existing *Specific Plan* zone district. Under the current Town of Mammoth Lakes zoning regulations, Project site parcels within the *North Village Specific Plan* area are designated as Specialty Lodging (SL) or Resort General (RG). Under the proposed *North Village Specific Plan*, the proposed Mammoth Crossing development would be designated as the “Mammoth Crossing” (MC) zoning district, providing for a range of short-stay accommodation choices, affordable housing, and retail and service uses of the types described above. Other approvals will be identified in accordance with applicable laws and regulations.

This Draft EIR serves as the environmental document for all discretionary actions associated with development of the Project. This EIR is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This Draft EIR is also intended to cover all federal, state, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed below. Federal, state and regional agencies that may have jurisdiction over the Project include, but are not necessarily limited to:

- California Department of Transportation (CalTrans)
- Great Basin Unified Air Pollution Control District (Air District)
- Lahontan Regional Water Quality Control Board (Lahontan RWQCB)
- Mammoth Lakes Fire Protection District (MLFPD)
- Mammoth Community Water District (MCWD)

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

INTRODUCTION

Section 15128 of the State *CEQA Guidelines* states:

“An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

An Initial Study (“IS”) was prepared for the Mammoth Crossing Project (“Project”) in October 2007 (see Appendix A to the Draft EIR). Based on the analysis contained in the IS and analysis done for the preparation of various Draft EIR sections, it was determined that implementation of the Project would not result in significant environmental impacts to the environmental impact topics listed below and therefore, are not discussed in detail in Section IV of this EIR. (Some less than significant impacts are discussed in the various sections of Section IV where additional analysis was required to determine the significance level; those issues are not discussed below.)

AGRICULTURAL RESOURCES

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. The Farmland Mapping and Monitoring Program (FMMP) designates the site as “other land” and no important farmland is identified. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Thus there is no impact and no further analysis of this issue is required.¹

The project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Generally, lands given the Land Use Designation of Agriculture (AG) may be eligible for a Williamson Act Contract, depending on the use of the land. The Project site is zoned Resort General (Site 1) and Specialty Lodging (Site 2 and 3) under the North Village Specific Plan and as stated previously, there is no identified prime farmland on the Project site. Therefore, the Project would not conflict with existing zoning for agricultural use or Williamson Act Contract. Thus there is no impact and no further analysis of this issue is warranted.

¹ California Division of Land Resource Protection, *Farmland Mapping and Monitoring Program Overview*, website: http://www.consrv.ca.gov/dlrp/FMMP/overview/survey_area_map.htm, October 12, 2007.

The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. The Project site is in an urbanized setting and no agricultural land uses are located in proximity to the Project site. Therefore, the Project would not result in conversion of Farmland to non-agricultural use. Thus there is no impact and no further analysis of this issue is required.

AIR QUALITY

The project would not create objectionable odors affecting a substantial number of people. The types of projects that commonly result in odor impacts include: wastewater treatment plant, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing, fiberglass manufacturing, auto body shops, rendering plants, and coffee roasters. The Project does not include any of these types of uses and therefore the Project would not create objectionable odors that could affect a substantial number of people. Impacts related to objectionable odors would be less than significant. Thus, no further analysis of this issue is warranted.

BIOLOGICAL RESOURCES

The project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No waters of the U.S. or waters of the State were observed on the Project site, including wetlands, streams, ponds, or lakes. Therefore, the Project would have no impact on jurisdictional resources and no further analysis of this issue is warranted.

The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan. The Project site and its vicinity are not located within an area covered by a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan; therefore, no impact would occur. Thus, no further analysis of this issue is warranted.

GEOLOGY AND SOILS

The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The Project does not include the use of septic tanks. No further discussion of this issue is necessary.

HAZARDS AND HAZARDOUS MATERIALS

The project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. The Project would not involve the routine transport, use or disposal of substantial quantities of hazardous materials. The Project would involve the development of residential (including hotel and affordable housing), retail, and commercial land uses and would only involve the use of common household and maintenance solvents typically associated with such activities. As such, no impact would occur and no further analysis of this issue is warranted.

The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Project site is not located within one-quarter mile of any existing or known proposed schools. Furthermore, the Project would not involve the routine transport, use, disposal, or accidental release of substantial quantities of hazardous materials. Therefore, the Project would not have the potential to emit substantial quantities of hazardous materials within one-quarter mile of an existing or proposed school and no impact would occur. Thus, no further analysis of this issue is warranted.

The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would not create a significant hazard to the public or the environment. According to the California Department of Toxic Substances Control, Hazardous Waste and Substances Sites database, the Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would not result in impacts related to being located on a site that is included on a list of hazardous materials sites. Thus, no further analysis of this issue is required.

The project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the project area. The Project site is not within an airport land use plan, nor is it within two miles of a public or private airport. The airport closest to the Project site is the Mammoth Yosemite Airport, located approximately ten miles to the east of the Project site. Therefore, the Project would not expose persons to safety hazards associated with an airport. Thus, no further analysis of this issue is required.

The project would not be within the vicinity of a private airstrip, resulting in a safety hazard for people residing or working in the project area. The Project site is not within two miles of a public or private airport. The airport closest to the Project site is the Mammoth Yosemite Airport, located approximately ten miles to the east of the Project site. Therefore, the Project would not expose persons to safety hazards associated with an airport. Thus, no further analysis of this issue is required.

The project would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project would not affect an emergency response plan. While the Project would introduce new development to the Project site, such development would conform with all applicable local, county, regional, State, and federal regulations pertaining to emergency safety. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and no impact would occur. The Emergency Response Plan may require amendments to accommodate the Project and the Project design will have to be consistent with the objectives of the plan. Thus, no further analysis of this issue is warranted.

HYDROLOGY AND WATER QUALITY

The project would not place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. The Project site is not located within a FEMA identified flood zone² or other flood hazard delineation map.³ Additionally, the Project would not place structures in an area that would impede or redirect flood flows within a 100-year flood hazard area. Therefore, there impacts as a result of developing within a 100-year floodplain would be less than significant. Thus, no further analysis of this issue is warranted.

The project would not place within a 100-year flood hazard area structures which would impede or redirect flood flow. As stated above, the Project site is not located within a FEMA identified flood zone. Therefore the Project would not place structures which would impede or redirect flood flows within a 100-year flood hazard and impacts would be less than significant. Thus, no further analysis of this issue is warranted.

The project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. No dams or levees are located in the Project site area. Therefore, the Project would not expose people or structures to a significant risk or loss, injury or death involving flooding, as a result of the failure of a levee or dam. Thus, no further analysis of this issue is warranted.

LAND USE AND PLANNING

The project would not physically divide an established community. Although the Project site is partially undeveloped, development and a roadway system already occur in the Project area. Implementation of the Project would not divide an established community and would not preclude the access or future use of any surrounding areas. Additionally, the Project would implement connectivity/pedestrian improvements

² Federal Emergency Management Agency (FEMA), *Flood Insurance Rate Map (FIRM) Mammoth Lakes, Mono County*, <http://msc.fema.gov>, October 16, 2007.

³ *Town of Mammoth Lakes 2005 General Plan Update, Revised Draft Program EIR, October 2005, page 4-146.*

that would better connect parcels to the north and south of the Project site, and integrate these parcels with the surrounding developments. Thus, no further analysis of this issue is required.

The project would not conflict with any applicable habitat conservation plan or natural communities' conservation plan. The Project site and its vicinity are not located within an area covered by a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan. Therefore, development of the Project would not conflict with any habitat conservation plan and no further analysis of this issue is warranted.

MINERAL RESOURCES

The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. There are no known mineral resources at or near the Project site. Thus, the Project would not result in the loss or availability of a known mineral resource that would be of value to the region and the residents or the state. No further analysis of this issue is required.

The project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. See discussion above. Therefore, no impact would occur and no further analysis of this issue is required.

NOISE

The project would not be located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels. The Project site is not within an airport land use plan, nor is it within two miles of a public or private airport. Therefore, the Project would not expose persons to safety hazards associated with an airport. Thus, no further analysis of this issue is required.

The project would not be located within the vicinity of a private airstrip, exposing people residing or working in the project area to excessive noise levels. See discussion above. Thus, no further analysis of this issue is warranted.

RECREATION

The project would include recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

The Project is viewed as part of a resort recreation center with residential uses, outdoor use areas, swimming pools and access to multiple options for recreational amenities (e.g., Mammoth Mountain,

trails and walkways, and the North Village area). As previously stated, the Project's recreational amenities in conjunction with the Town's current facilities and the collection of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the Project's demand for parks and recreational services. The Project provides for on-site recreational amenities for guests, visitors and residents pursuant to the requirements of the North Village Specific Plan and would not involve the need for construction or expansion of off-site public recreational facilities. On-site recreational facilities may include swimming pools, spas, and gyms. Separate private facilities would be provided for employees residing on site. Therefore, impacts would be less than significant and no further analysis of this issue is required, however any impacts associated with park facilities will be addressed in the Public Services section of the EIR.

TRANSPORTATION/TRAFFIC

The project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Due to the nature and scope of the Project, implementation of the Project would not have the potential to result in a change in air traffic patterns at any airport in the area. Therefore, no further discussion of this issue is required.

UTILITIES AND SERVICE SYSTEMS

The project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge ("ROWD") containing information which may be required by the appropriate Regional Water Quality Control Board ("RWQCB"). The RWQCB then authorizes a National Pollutant Discharge Elimination System (NPDES) permit that ensures compliance with wastewater treatment and discharge requirements. The Project site is not served by a private on site wastewater treatment system, but instead conveys wastewater via municipal sewage infrastructure to a treatment plant operated by the Mammoth Community Water District. This treatment facility is a public facility and is therefore subject to the State's wastewater treatment requirements. Wastewater from the Project site is therefore treated according to the wastewater treatment requirements enforced by the California Regional Water Quality Control Board, Lahontan Region, and no significant impact would occur. Therefore, no further analysis related to this specific issue is required.

The project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Solid waste disposal service for the Town of Mammoth Lakes is currently contracted to Mammoth Disposal Incorporated. Solid waste is disposed at the Benton Crossing Landfill, which is located within Mono County. The landfill has a remaining capacity of 1.7 million cubic yards of compacted waste and is anticipated to have the capacity to accommodate the Town's waste generation

and disposal needs for the next 20 years. In addition, the Town has an option for five years at the Pumice Valley Landfill. With the existing capacity in the Benton Crossing Landfill as well as the option for disposal for five years at the Pumice Valley Landfill, there is adequate landfill capacity for the Project population. While the Project will generate an increase in the amount of solid waste disposed of at the landfill, the Project would not result in the need to construct a new landfill or expand existing facilities. In addition, recycling will be required within the Project and the applicant will be required to comply with municipal laws and regulations regarding provision of recycling collection rooms. Therefore, no further discussion of this issue is required.

The project would comply with federal, state, and local statutes and regulations related to solid waste. The construction and operation of the Project would be required to adhere to all applicable federal, State, and local statutes and regulations related to solid waste. Therefore, Project impacts regarding compliance with federal, State, and local statutes and regulations related to solid waste would be less than significant, and no further discussion of this issue is required.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

B. AESTHETICS

INTRODUCTION

This section addresses the subject of aesthetics with respect to the Mammoth Crossing Project (“Project”) and includes a description of existing visual conditions and an evaluation of potential aesthetic effects associated with implementing the Project. Computer-generated visual simulations illustrating “before” and conceptual “after” visual conditions at the Project site as seen from 10 representative, public vantage points are presented as part of the analysis. Digitized photographs and computer modeling and rendering techniques were used to prepare the simulation images.

In addition, this section addresses the subjects of nighttime illumination, daytime glare, and the effects of shade/shadow from proposed buildings. Computer models were used to determine approximate shadow patterns emanating from proposed buildings during the summer solstice, winter solstice, and spring and fall equinox.

ENVIRONMENTAL SETTING

Regulatory Framework

Mammoth Lakes is a recreation resort community located in the Eastern Sierra and contains a plethora of mountain meadows, creeks, mountain vistas, forests, and wildlife. Visitors enjoy fishing, skiing, snowboarding, hiking, camping, bicycling, and other recreational pursuits throughout the year. To ensure the preservation of existing valuable visual resources and the Town’s visual character, regulations and requirements have been integrated into the current *Town of Mammoth Lakes General Plan 2007* (“General Plan”) as well as the Town of Mammoth Lakes Municipal Code (“Town Municipal Code”).

The Town adopted the General Plan and certified Revised Final Program EIR on the 2005 General Plan Update in 2007. The General Plan contains a specific plan land use designation intended to provide a more refined description of land uses and development policies. The General Plan designates Sites 1, 2, and 3 as *North Village Specific Plan* (“Specific Plan”). The Specific Plan was adopted in December 2000. It was amended in January 2005 and May 2008. The Specific Plan area, while conforming to the overall development goals established in the General Plan, is oriented toward the ultimate goal of establishing the North Village as a center for year-round resort activity. Therefore, the relevant policies that address aesthetics resources from General Plan and the Specific Plan are addressed below. As discussed in the Section III, Project Description, of this Draft EIR, the Project includes amendments to the General Plan and the Specific Plan which would be required to accommodate the Project’s proposed land uses.

Additionally, the Town Municipal Code Section 17.32.120 sets forth the design review process and authority. The *Town of Mammoth Lakes Design Guidelines* (“Design Guidelines”), in accordance with

Town Municipal Code Section 17.32.120, are a communication tool to assist the Town in guiding and evaluating renovation of existing and new development projects. The Town Municipal Code also sets forth design criteria for Signs and Outdoor Lighting (Section 17.40 and Section 17.34, respectively).

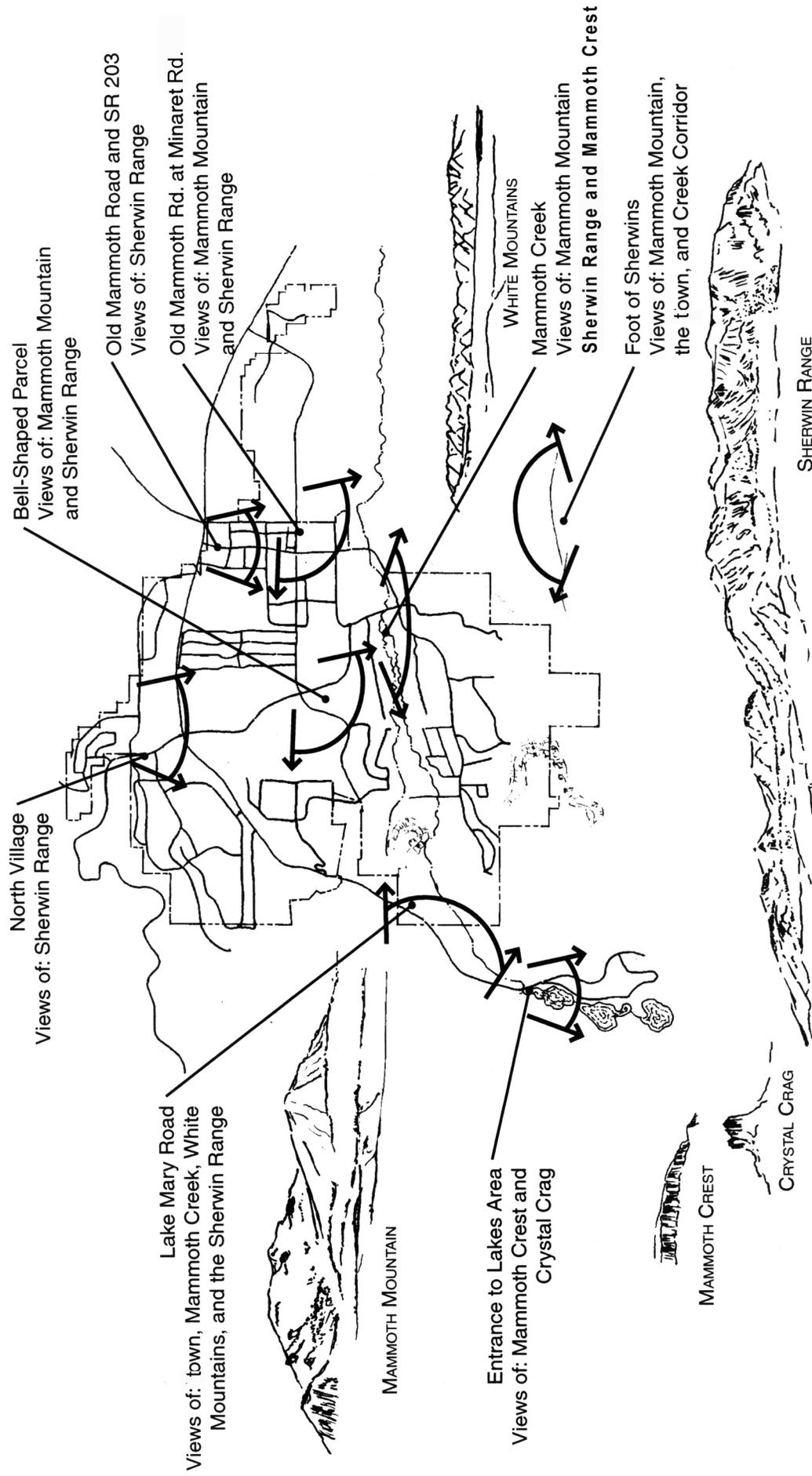
General Plan 2007

Visual resources are addressed in the Community Vision, the Community Design Element and the Neighborhood and District Character Element of the General Plan. The General Plan addresses the Town's dramatic setting as one of the major attractions to residents and visitors. In order to achieve the Community Vision the Town places a high value on maintaining exceptional standards for design and development that complement and are appropriate to the Eastern Sierra Nevada mountain setting and their sense of a "village in the trees" with small town charm. The intent of the Community Design Element is to establish the goals and policies to describe the relationship between people and the man-made and natural environment. The intent of the Neighborhood and District Character Element is to enhance the unique character of Mammoth Lakes, through the careful development of individual sites and districts. The Town is comprised of 12 different districts of which the North Village is one. District boundaries are based on the 1987 General Plan Planning Districts and are defined by existing development, patterns of vegetation, topographic features, circulation patterns, and the pattern and relationships of land uses. Master planning of these specific districts provides a basis for future land use decisions incorporating the goals, policies and actions in the Community Design Elements as well as the Neighborhood and District Character Element.

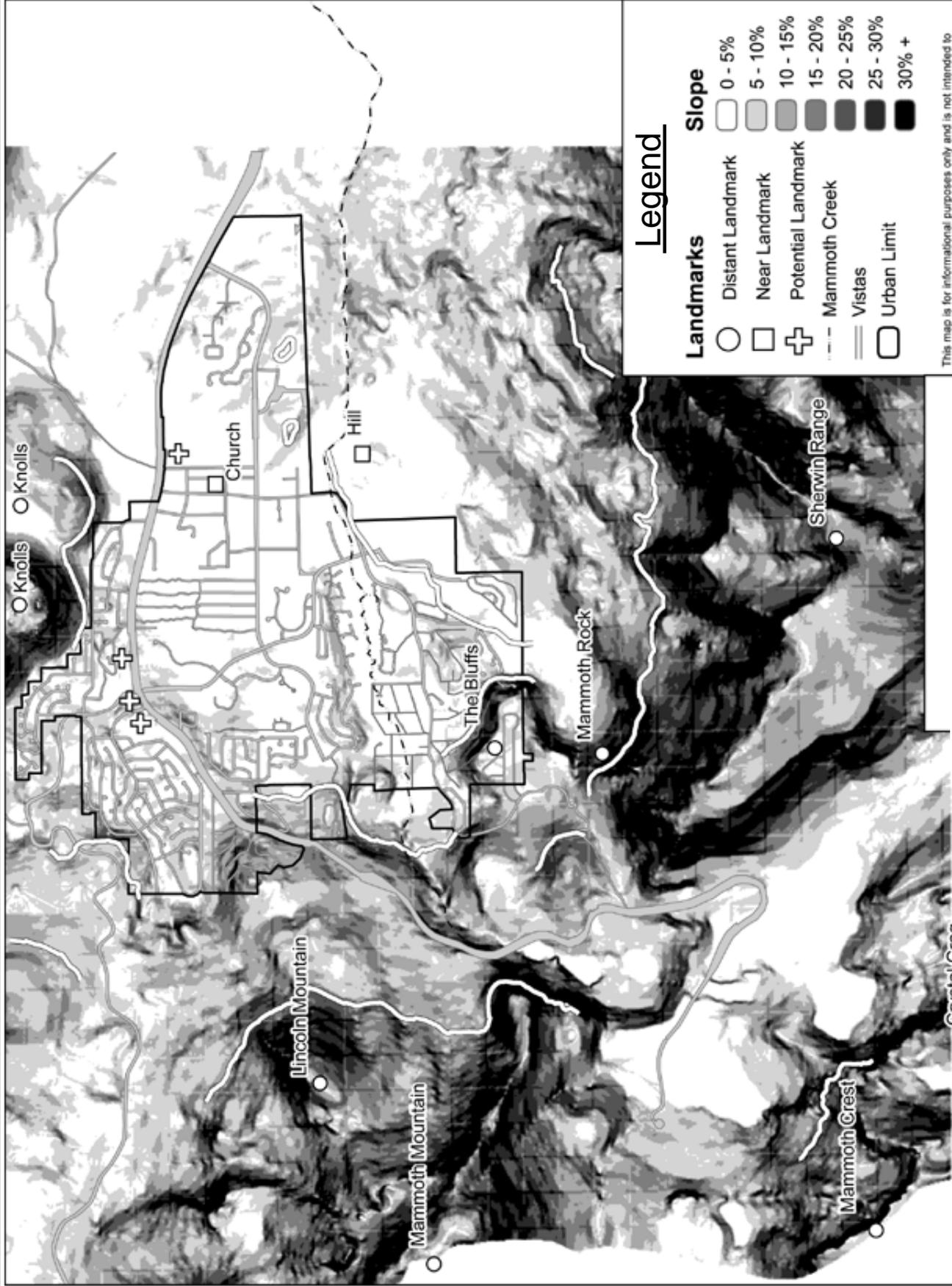
Districts are a distinctive and important part of the Town and add a different complementary element to the community of Mammoth Lakes. The North Village District, in the northwest portion of Town adjacent to Main Street, Lake Mary Road, and Minaret Road, is primarily comprised of more urban development. The North Village is an intensely focused entertainment district. It should incorporate active open pedestrian plazas showcasing mountain views with retail, entertainment, and public art including local talent. North Village characteristics relating to aesthetics include the following:

- Viewsheds to Sherwin Range and the Knolls are preserved
- Landscape that recalls the Eastern Sierra and establishes scale and street edge
- Create a sense of exploration using pedestrian-oriented sidewalks, plazas and courtyards with pedestrian comforts
- Gateway intersection at Minaret Road and Main Street/Lake Mary Road

The policies in the General Plan support the retention of major landscape characteristics and unique natural features such as large trees, Mammoth Mountain, Mammoth Rock, Crystal Crag, the Bluffs, the Sherwin Range, Long Valley, Mammoth Knolls, and Mammoth Crest. Major view corridors and vistas toward these important landscape features are identified in the General Plan, and are shown in Figure IV.B-1, Major View Corridors and Vistas and Figure IV.B-2 Vistas and Landmarks.



Source: Natural Resources Conservation & Open Space Plan for the Town, September 2000, prepared by Diane Bonanno and Intis Lutens.

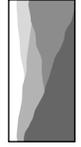


Legend

- | | |
|----------------------|--------------|
| Landmarks | Slope |
| ○ Distant Landmark | 0 - 5% |
| □ Near Landmark | 5 - 10% |
| ⊕ Potential Landmark | 10 - 15% |
| --- Mammoth Creek | 15 - 20% |
| == Vistas | 20 - 25% |
| ▭ Urban Limit | 25 - 30% |
| | 30% + |

This map is for informational purposes only and is not intended to provide legal descriptions of lots or other physical features. Any information on this map is subject to change without notice at any time.

Source: Town of Mammoth Lakes General Plan.



Scale (Feet)

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Figure IV.B-2
Vistas and Landmarks

The General Plan policies and implementation measures ensure the preservation of the visual resources and visual character of the Town of Mammoth Lakes. Consistency with General Plan policies is analyzed below under “Environmental Impacts.”

North Village Specific Plan 2000

As described above, the Project site falls within the jurisdiction of the Specific Plan. The Specific Plan establishes architectural and landscaping guidelines to strengthen the North Village’s image as a resort activity node in Mammoth Lakes. The design emphasizes the creation of diverse shopping, recreational, residential and cultural opportunities. The scale of the individual ground level shops should vary giving the commercial center a feeling of a village that has grown over time. Building expressions should be generally vertical rather than horizontal in form and should be carefully detailed to generate the scale and texture appropriate to pedestrian places. The arrangement of buildings should define the edges of the public plazas and serve as foreground buildings to larger scale lodges and hotels. The style of the architecture and landscape is intended to feature the materials and forms associated with the Sierra. Development in the North Village should preserve views between and over buildings, across the valley, to Mammoth Mountain, to the Sherwin Mountains.

The Specific Plan designation contains land use districts indicating site-specific land use designations for individual parcels. Site 1 is zoned as Resort General (RG) and Sites 2 and 3 are zoned as Specialty Lodging (SL) in Specific Plan. The Specific Plan also contains development and design standards describing density, site coverage, building area and heights, building setbacks, and other building design specifications. The Specific Plan policies and implementation measures ensure the preservation of the visual resources and visual character relevant to the North Village in support of the Town’s overall goal. Consistency with the Specific Plan policies is analyzed below under “Environmental Impacts.”

As discussed in the Section III, Project Description, of this Draft EIR, the Project includes amendments to the Specific Plan, as well as the General Plan, which would be required to accommodate the Project’s proposed land uses.

Town of Mammoth Lakes Design Guidelines

The Design Guidelines are “intended to bring a comprehensive and unified approach to the review of development projects so that integration of individual projects can create an attractive community.”

The Design Guidelines are based on core community values to guide future development to ensure that the Town retains its uniqueness as a mountain resort. The community values include the following:

- Unique eclectic character;
- Identifiable neighborhoods;
- Maintenance of important views and vistas;

- Natural beauty;
- Healthy forests;
- Understandable, convenient and complete pedestrian, bike and transit connections;
- Building scale and proportions appropriate to a pedestrian environment;
- Use of natural, regional materials in the built environment;
- Encouragement of integrated systems design; and
- Environmentally sensitive design.

Each of the community values has associated design principles detailed in the Design Guidelines. The design principals are expressed throughout the Design Guidelines in the form of specific objectives and guidelines. The six objectives in the Design Guidelines include the following:

- **Site Design.** Proposed developments shall address the opportunities and limitations of the site and its surroundings and should integrate the relationship between the site's topography, existing vegetation, other natural features, adjacent properties, views, solar access, the uses proposed and the development plan.
- **Architectural.** The architectural style of buildings within the Town of Mammoth Lakes is currently diverse and of an eclectic quality. Residents and property owners identify with this character and would like to see it maintained, while improving the general quality of the built environment, pedestrian spaces and pedestrian relationships to buildings.
- **Landscape and Public Space.** The objective of any landscaping plan shall be to create a pleasant setting and to preserve and enhance the natural landscape character of the development area. The scale and overall design shall be such that new vegetation and landforms blend with the natural environment.

Removal of trees, shrubs, and non-hazardous native plant materials generally shall be limited to that essential for development of the site.

Each development application shall evaluate any and all existing trees on site greater than six inches in diameter at shoulder height, and substantiate proposed removal to the Town of Mammoth Lakes. New vegetation should be of substantial size and variation to resemble a natural pre-disturbance condition.

- **Lighting.** Outdoor lighting plays a significant role in creating safe pedestrian environments, establishing character in the town and highlighting special features of the built environment. Exterior lighting must conform to the Town Municipal Code Chapter 17.34 – Ordinance No 03-09 “Outdoor Lighting” in addition to these Design Guidelines.

- **Signage.** Signage should reflect the character of the neighborhood with regard to materials, form and use.

Signage form and quality should relate directly to its purpose, context and location.

Signage should inform and direct, but in a manner and style which creates a memorable environment, particularly within pedestrian zones. As such, signage provides an opportunity to introduce whimsical, historical and/or sculptural character.

- **Outdoor Sales/Storefront Displays.** Outdoor sales, public events, and storefront displays provide the opportunity for businesses and event sponsors to create an attractive environment, adding interest and activity to the streetscape, and attracting residents/tourists and pedestrians/shoppers.

Town of Mammoth Lakes Municipal Code

The Town Municipal Code sets forth rules and regulations governing the design, use, and display of lighting and signs within the Town. It is acknowledged in the Town Municipal Code that the economy of the Town is dependent upon aesthetics, as it is a tourist-based economy. Lighting and signs have the potential to substantially impact the environment and, as such, affect the local economy.

Outdoor Lighting

Chapter 17.34 of the Town Municipal Code sets forth rules and regulations for outdoor lighting within the Town of Mammoth Lakes. The purpose of Chapter 17.34 is to accomplish the following:

- To promote a safe and pleasant nighttime environment for residents and visitors;
- To protect and improve safe travel for all modes of transportation;
- To prevent nuisances caused by unnecessary light intensity, direct glare, and light trespass;
- To protect the ability to view the night sky by restricting unnecessary upward projection of light;
- To phase out existing non-conforming fixtures that violate this chapter, including those owned by the Town and other public agencies; and,
- To promote lighting practices and systems to conserve energy.

Section 17.34.060 of the Town Municipal Code requires that an Outdoor Lighting Plan be submitted in conjunction with: an application for design review approval; a conditional use permit; subdivision approval; or, a building permit for a new structure or addition(s) of 25 percent or more in terms of gross floor area, seating capacity, or parking spaces (either with a single addition or cumulative additions). An Outdoor Lighting Plan is required for all new outdoor lighting installations on commercial (including four or more units of multi-family residences), industrial, public and institutional properties.

Signs

Chapter 17.40 of the Town Municipal Code sets forth rules and regulations governing the display of signs within the Town. The purpose of Chapter 17.40 is to achieve the following:

- Recognize that commercial signs are a necessary means of useful communication for the convenience of the public;
- Regulate the number, location, height, size, design, construction, color and illumination of signs in order to maintain and improve the image, attractiveness and environmental qualities of the town;
- Preclude sign size and placement from conflicting with the principal permitted use of the site or adjoining sites;
- Regulate sign size in relationship to the scale of the street frontage and/or building face where such signage is to be placed;
- Enhance the attractiveness and economic well-being of the town as a place to live, vacation and conduct business while cultivating the town's premier status in an increasingly competitive resort market;
- Protect, preserve and enhance the unique aesthetic character, beauty and charm of the town, and thereby encourage the continued development of tourism within the town;
- Protect the public from hazardous conditions that can result from commercial signs which are structurally unsafe, obscure the vision of motorists, create dangers to pedestrian traffic, or which compete or conflict with necessary traffic signals and warning signs;
- Avoid the creation of a "tourist trap" atmosphere which can result when business enterprises compete for attention through the use of commercial advertising signs, and promote an overall visual effect which has a minimum of clutter;
- Eliminate distracting lighting and excessive glare by reasonably limiting the illumination of signs to subdued, adequately shielded or concealed light sources;
- Encourage the construction of commercial signs of natural materials which are aesthetically pleasing and are compatible with natural surroundings and the buildings to which they identify; and,
- Retain permit affordability in order to promote maximum applicant revenues being used for creative signage.

Existing Visual Character

Project Site

As previously discussed in Section II, Environmental Setting, of this Draft EIR, the Project, is comprised of four separate sites totaling approximately 11 acres. The Project is located in the northwest portion of Town. Sites 1 through 3 include existing development and are within the section of Town commonly known as the “North Village,” while the core area of development surrounding the gondola is known as the “The Village at Mammoth” or “The Village.” Sites 1 through 3 are located at the northwest, southwest and southeast corners of the Main Street-Lake Mary Road/Minaret Road intersection, respectively. Site 4 is undeveloped and is not within the Specific Plan area. Site 4 is located to the south of the Main Street-Lake Mary Road/Minaret Road intersection to the east of Minaret Road (refer to Figure II-2 [Aerial Photograph] in Section II, Environmental Setting, of this Draft EIR). Site 4 is proposed to be incorporated into the Specific Plan boundary and no new development is proposed on Site 4 as part of this Project. Therefore, the Project’s three development sites total approximately 9.3 acres. The three development sites are primarily developed and are generally characterized by existing and abandoned development surrounded by residential and recreational land uses. Detailed existing conditions of each Project site is as follows:

- Site 1 comprises approximately two acres, of which approximately .05 acres is a vacated right-of-way. In addition to the operating Whiskey Creek Restaurant, Site 1 contains several existing occupied office/commercial buildings and paved surface parking areas. Site 1 is relatively flat and includes the Jeffery pine-fir community along the northern edge. Site 1 is primarily paved; there are approximately five to ten trees within the paved area. Refer to Figure II-5, Views of Project Site 1 in Section II, Environmental Setting, of this Draft EIR.
- Site 2 comprises a total of approximately five acres, of which approximately one acre is a vacated right-of-way. Site 2 has an existing vacant church and seven occupied buildings, including the North Village Inn, some office/retail and storage structures, and surface parking. Site 2 includes the Jeffery pine-fire forest plant community along on the southern portion of the site. Site 2 is relatively flat along the northern portion of the site and has a steep drop-off on the southern edge toward the Sierra Star Golf Course. Refer to Figure II-6, Views of Project Site 2 in Section II, Environmental Setting, of this Draft EIR.
- Site 3 comprises a total of approximately three acres. Site 3 has the vacant Ullr Lodge and White Stag Inn. Both the Ullr Lodge and the White Stag Inn have surface parking areas and several small accessory structures on site. Site 3 includes the Jeffery pine-fire forest plant community along on the western and southern portion of the site. Site 3 has a steep embankment from its Main Street and Minaret Road borders. The existing buildings are developed on a relatively flat area which gently slopes south toward the Sierra Star Golf Course. Refer to Figure II-7, Views of Project Site 3 in Section II, Environmental Setting, of this Draft EIR.

Surrounding Area

Existing Viewsheds

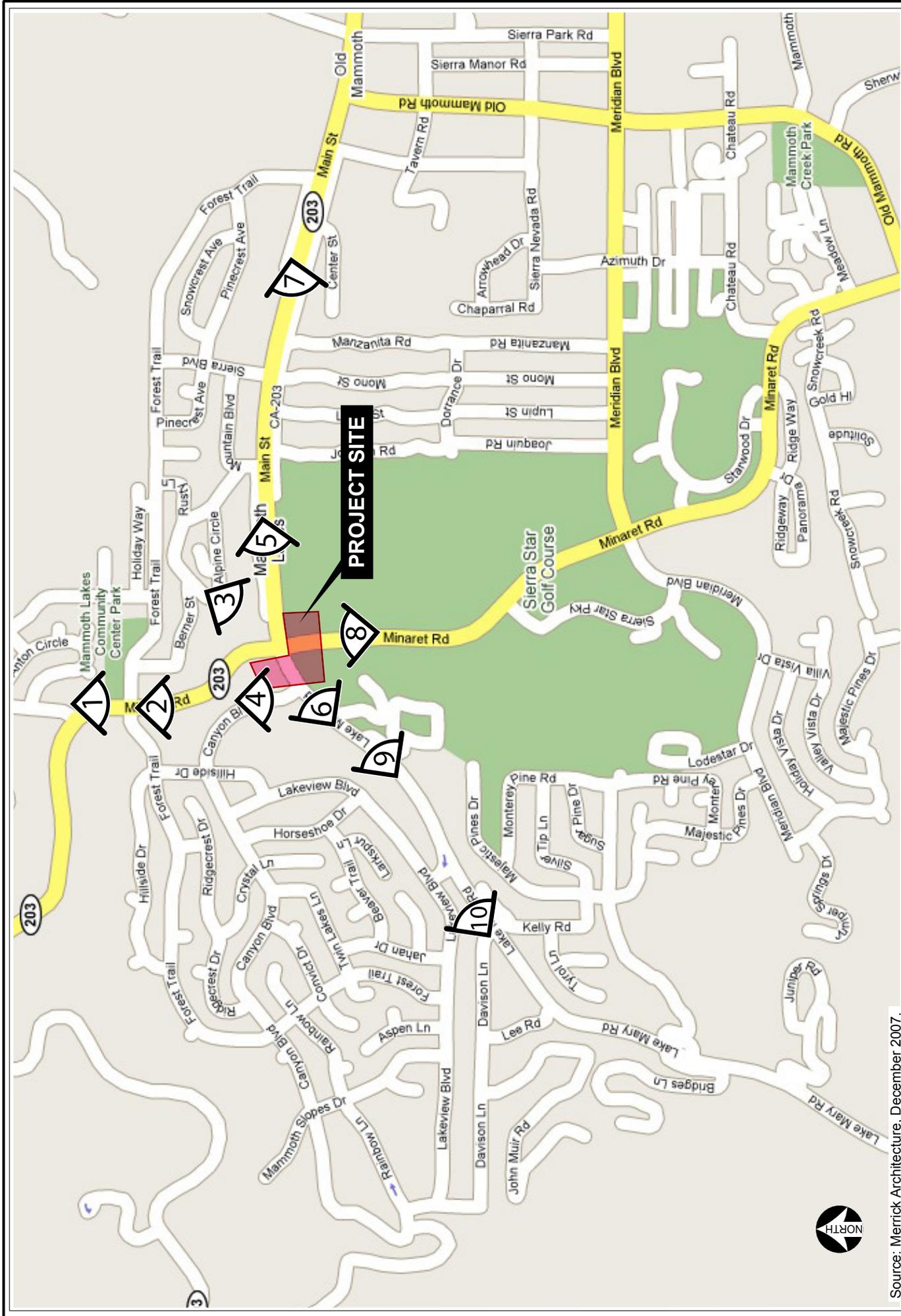
Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. In the area surrounding the Project site, the existing viewsheds are defined primarily by major view corridors and vistas (refer to Figure IV.B-1 and IV.B-2) as well as the nearby roadways (e.g., Lake Mary Road, Main Street and Minaret Road). The major view corridors and vistas that could be potentially affected by the development of the Project as well as other viewpoints of interest are identified and discussed in detail below. The locations of these viewpoints are depicted in Figure IV.B-3, Viewpoint Location Map.

Public views are those which can be seen from vantage points that are publicly accessible, such as those from streets, freeways, parks and vista points. These views are generally available to a greater number of persons than are private views. As shown previously in Figure IV.B-1 and IV.B-2, the Town has identified public view and public view corridors that visually connect community to surroundings (General Plan Policy C.2.W). Private views are those which can be seen from vantage points located on private property. Private views are not necessarily considered to be impacted when interrupted by land uses on adjacent blocks.

Public Views and Scenic Vistas

Throughout the Town, there are several places where views of scenic resources from areas near the Project site are publicly accessible. The following 10 view locations were analyzed (refer to Figure IV.B-3.) A detailed description and figures illustrating the before and after views is presented further below in this section under the heading Impact AES-1 Public Views of Scenic Vistas (refer to Figures IV.B-4 through IV.B-23.)

- View 1: Mammoth Knolls Drive/Minaret Road Intersection Looking South
- View 2: Forest Trail/Minaret Road Intersection Looking South
- View 3: Northeast of the Lake Mary Road-Main Street/Minaret Road Intersection Looking Southwest
- View 4: Canyon Boulevard Looking South
- View 5: Main Street Near the Project Site Looking West
- View 6: Lake Mary Road Near the Project Site Looking East
- View 7: Main Street Commercial Corridor Looking West
- View 8: Minaret Road Looking North
- View 9: Lake Mary Road West of View 6 Looking Northeast
- View 10: Lake Mary Road West of View 9 Looking Northeast



Source: Merrick Architecture, December 2007.

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Environmental Planning and Research

Figure IV.B-3
Viewpoint Location Map

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Shading/Shadows

The issue of shade and shadow addresses the blockage of direct sunlight by on-site buildings, which affect adjacent properties. Shading is an important environmental issue because it may impact the users or occupants of certain land uses, including routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors.¹ In the Mammoth Lakes area shading is also an important safety issue. In winter conditions snow and ice buildup are more likely to occur in shaded areas creating hazardous conditions (i.e., black ice) especially in locations where there are sloping roads and driveways.

Shadow lengths are dependent on the height and size of the building from which it is cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e., time of day) and elliptical orbit (i.e., change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice

“Solstice” is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90 degrees). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2 degrees of the arc. At winter solstice, about December 21, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 21, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year. Shadows are shown for winter solstice, cast from 9:00 a.m. to 3:00 p.m., and for summer solstice, cast from 9:00 a.m. to 5:00 p.m.

Autumn and Spring Equinox²

At the time of the autumn equinox, near September 22, and the spring equinox, near March 21, night and day are nearly the same length and the sun crosses the celestial equator moving southward (in the northern hemisphere). The autumnal equinox marks the first day of the season of autumn and the spring

¹ City of Los Angeles, Department of Environmental Affairs, Draft Los Angeles CEQA Thresholds Guide, 1998.

² Please note there are no established thresholds of significance for equinox shadows. The existing and proposed equinox shadows depicted in this section are for informational purposes only.

equinox marks the first day of the season of spring. Shadows are shown for the autumn/spring equinox, cast from 8:00 a.m. to 4:00 p.m.

Assumptions

Topography was incorporated as one of the components in the following analysis as the changes in elevation in the area of the Project site are varied. The heights of the proposed buildings were based on available architectural diagrams. The topography, dimensions, setbacks, and placement of existing buildings were estimated based on the existing and proposed site plans.

Existing Shadow-Sensitive Uses and Shadow Patterns

The area around the Project site was surveyed for shadow sensitive uses in November 2007. There are adjacent shadow-sensitive uses surrounding the Project site, including, but not limited to, the Sierra Star Golf Course, the Holiday Haus hotel and the nearby residences. Although the Sierra Star Golf Course is mostly used in the summer months, when there is no snow on the ground, it is used sparingly in the winter months for snowshoeing by local residents. The usable outdoor spaces associated with the nearby residences (e.g., yards, balconies, etc.) are routinely used in the summer months; however, these outdoor spaces are rarely used in the winter months. As there are currently buildings on the Project site, there are shadows currently being cast from buildings.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the project could have a significant environmental impact if it would:

- (a) Have a substantial adverse effect on a scenic vista;
- (b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, or historic buildings within a scenic highway;
- (c) Significantly degrade the existing visual character or quality of the site and its surroundings; or
- (d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Although there are no adopted thresholds of significance for shadow impacts in the State *CEQA Guidelines*, the following thresholds are used in this analysis:

- A project impact would normally be considered significant if shadow-sensitive uses³ would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).⁴
- Require an exception (variance) to the policies and regulations in the General Plan, Planning Code, or Uniform Building Code, and the exception causes a fundamental conflict with policies and regulations in the General Plan, Planning Code, and Uniform Building Code addressing the provision of adequate light related to appropriate uses.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

³ *Shadow sensitive uses are facilities and operations sensitive to the effects of shading, including the following: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; existing solar collectors and on sloping roads and driveways where snow and ice buildup would create hazardous conditions.*

⁴ *City of Los Angeles, Department of Environmental Affairs, Draft Los Angeles CEQA Thresholds Guide, 1998.*

Project Impacts and Mitigation Measures

Impact AES-1 Public Views of Scenic Vistas

A significant impact would occur if the Project substantially blocks public views of a scenic vista. The following discussion provides a comparison of “before” views and “after” views of the Project site which are publically accessible and of scenic resources which are publically accessible from areas near the Project site. A total of 10 photo simulations depicting views after the Project is constructed are presented below. The locations from which the view photographs were taken and the direction of each view is indicated on Figure IV.B-3. The “before” views are described above under the heading Public Views and Scenic Vistas in the Environmental Setting section. The “after” views were produced by simulating what the Project is expected to look like after construction is completed using computer modeling, photographs, and Project plans. The “before” and “after” views are presented in Figures IV.B-4 through IV.B-25.

Mammoth Knolls Drive/Minaret Road Intersection Looking South (View 1)

View 1 is located on Minaret Road just north of The Village at the Mammoth Knolls Drive/Minaret Road intersection. This view looks south in the direction of the Project site. Public views from this area include the pine tree lined Minaret Road. As shown on Figures IV.B-4 and IV.B-5, due to the curves and the natural topography on Minaret Road no development on the Project site either before or after Project build-out is visible from this public view. The Project would not substantially block views of a scenic vista from View 1. Therefore, public views of scenic vistas would not be altered with the development of the Project from View 1 and **no impact** would occur.

Forest Trail/Minaret Road Intersection Looking South (View 2)

View 2 is located at the Forest Trail/Minaret Road intersection just north of The Village. This view looks south in the direction of the Project site. Public views from this area include Minaret Road, The Village on the west side of Minaret Road, a surface parking lot for The Village to the east of Minaret Road in the foreground, and the Sherwin Range in the background. This view is considered a major view corridor and the Sherwin Range is considered a major scenic vista in the *General Plan*. As shown on Figures IV.B-6 and IV.B-7, due to the natural topography on Minaret Road no development on the Project site either before or after Project build-out is visible from this public view. The Project would not substantially block views of a scenic vista from View 2. Therefore, public views of scenic vistas would not be altered with the development of the Project from View 2 and **no impact** would occur.

Northeast of the Lake Mary Road-Main Street/Minaret Road Intersection Looking Southwest (View 3)

View 3 is located northeast of the Project site in a nearby residential land use area off of Alpine Circle. The view looks southeast in the direction of the Project site. Public views from this area include a grove of pine trees surrounding a tennis court. Some existing development is visible through the grove of pine

trees. As shown on Figures IV.B-8 and IV.B-9, due to the existing trees and natural topography no development on the Project sites either before or after Project build-out is visible from this public view. The Project would not substantially block views of a scenic vista from View 3. Therefore, public views of scenic vistas would not be altered with the development of the Project from View 3 and **no impact** would occur.

Canyon Boulevard Looking South (View 4)

View 4 is located on the west side of Canyon Boulevard looking south toward the Project site. As shown on Figure IV.B-10, public views from this site in its existing condition include Canyon Boulevard, the Canyon Boulevard/Lake Mary Road intersection, some existing buildings on Project Sites 1 and 2, existing pines on Project Site 2, the slopes of the undeveloped parcel to the west of Canyon Boulevard in the foreground and existing trees which partially obstructed views of the Sherwin Range in the background. Public views of the scenic Sherwin Range are currently partially obstructed by the existing development, pine trees, and utility poles and wires.

As illustrated on Figure IV.B-11 after construction of the Project, views of the proposed hotels on Project Site 1 and Site 2 would be visible in the foreground. The visibility of the proposed hotels represents an alteration of an existing viewshed and would result in a partial obstruction of public views of the Sherwin Range. However, public views would not be fully obstructed and existing views of the Sherwin Range would be partially maintained. As previously noted, the public views of the scenic Sherwin Range are currently partially obstructed. The lower height of the Site 2 hotel's lobby/check in area allows a partial view of the Sherwin Range to remain intact. Although views of the Sherwin Range and existing pines would be partially obscured by the Project, the Project would not substantially block views of a scenic vista from the View 4 location. Therefore, the impact of the development of the Project on the view from Canyon Boulevard looking south toward the Sherwin Range would be **less than significant** and no mitigation measures are required.

Main Street Near the Project Site Looking West (View 5)

View 5 is located to the east of the Project site on Main Street. The view is looking west in the direction of the Project site. As shown on Figure IV.B-12, public views from this view point include Main Street in the foreground; a wooden barrier wall and trees on the north side of Main Street; the vacant White Stag Inn on Site 3 and adjacent pine tree grove on the southern side of Main Street; the Lake Mary Road-Main Street/Minaret Road intersection and the existing development on Project Site 1 as well as development currently under construction west of Canyon Boulevard. A portion of Mammoth Mountain is visible in the background although partially obstructed by existing pine trees.

As shown in Figure IV.B-13, after Project build-out the proposed hotel and ground level retail on Project Site 1, and the proposed hotel on Site 3 would be visible in the background from this view. The proposed development on Site 3, while primarily within the existing tree canopy, would partially obstruct the view

of Mammoth Mountain. The visibility of the proposed Site 3 hotel represents an alteration of an existing viewshed and would result in a partial obstruction of public views of Mammoth Mountain. However, public views would not be fully obstructed and existing views of the Mammoth Mountain would be largely maintained. Therefore development of the Project would not substantially block views of a scenic vista from View 5. Therefore, the Project would not result in significant changes to public views of Main Street looking north and this impact would be ***less than significant*** and no mitigation measures are required.

Lake Mary Road Near the Project Site Looking East (View 6)

View 6 is located to the west of the Project site on Lake Mary Road near the northwestern corner of Project Site 3. The view looks east in the direction of the Project site. As shown on Figure IV.B-14, public views from this point include the existing development on Project Site 1 and Site 2; the Fireside Condominiums adjacent and north of Project Site 1; the Canyon Boulevard/Lake Mary Road intersection; the slopes of the undeveloped parcel on the northwest corner of the Canyon Boulevard/Lake Mary Road intersection in the foreground; and the Lake Mary Road-Main Street/Minaret Road intersection; pine trees and the scenic Mammoth Knolls in the background. The Mammoth Knolls are considered a distant landmark and scenic vista in the *General Plan*.

As shown in Figure IV.B-15, the proposed hotels on Project Site 1 and Site 2 are visible from this view. While views of the existing pines and scenic Mammoth Knolls would remain partially visible, they would be largely obscured by the Project and the Project would result in substantial changes to scenic views from the View 6 location. Therefore, the Project would substantially block public views of a scenic vista from Lake Mary Road near the Project site looking east and this impact would be ***significant***.

Main Street Commercial Corridor Looking West (View 7)

View 7, Figure IV.B-10, is located to the east of View 5 on Main Street. The view is looking west in the direction of the Project site. As shown on Figure IV.B-16, public views from this point include Main Street and commercial land uses on the north and south of Main Street in the foreground, and pine trees and Mammoth Mountain in the background. Due to the curves and natural topography, the Project site under existing conditions is not visible from this public view. As shown in Figure IV.B-17, the proposed Project is not visible from this view point. Therefore, the Project would not substantially block public views of a scenic vista from View 7 and ***no impact*** would occur.

Minaret Road Looking North (View 8)

View 8, Figure IV.B-18, is located to the south of the Project Site on the eastern side of Minaret Road. The view is looking north in the direction of the Project site. Public views from this point include all four corners of the Lake Mary Road-Main Street/Minaret intersection. Existing development on Project Sites 1 through 3 are visible as are the partially obstructed distant landmark of the scenic Mammoth Knolls in the background. The Mammoth Knolls are currently partially obstructed by existing pine trees from this

public view. As shown in Figure IV.B-19, the proposed hotels on Project Sites 1 and 2 are visible from this view and the views of the existing pines and scenic Mammoth Knolls would be substantially obscured by the Project. The Project would substantially block public views of a scenic vista from the View 8 location. Therefore, the Project would result in significant changes to views from Minaret Road looking north and this impact would be **significant**.

Lake Mary Road West of View 6 Looking Northeast (View 9)

View 9, Figure IV.B-20, is located west of View 6 and is looking northeast towards the Project site. Public views from this point include the pine tree lined Lake Mary Road and utility poles and lines in the foreground, and the Canyon Boulevard-Lake Mary Road intersection and the distant landmark of the scenic Mammoth Knolls in the background. Project Site 1 is visible in the far distance from this public view.

As shown in Figure IV.B-21, the proposed hotel on Project Site 1 is visible from this view. The scenic view features visible from this view include the existing pine trees and the scenic Mammoth Knolls in the background. Although views of the existing pines would be obscured by the Project, the scenic Mammoth Knolls would not be obscured. Therefore, the Project would not result in significant changes to views from Lake Mary Road near the Project site looking east and this impact would be **less than significant**.

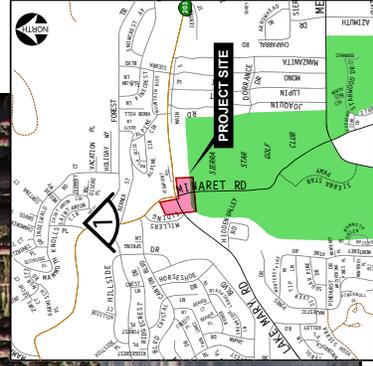
Lake Mary Road West of View 9 Looking Northeast (View 10)

View 10, Figure IV.B-22, is located west of View 9 and is looking northeast towards the Project site. Public views from this point include the pine tree lined Lake Mary Road and existing residential land uses on the north and south sides of Lake Mary Road in the foreground and pine trees in the background. The Project site under existing conditions is not visible from this public view.

As shown in Figure IV.B-23, existing trees and topography obstruct the view of the Project thus the proposed Project is not visible from this view point. Therefore, the development of the Project would not introduce an incompatible visual element within a field of view containing a scenic vista or substantially block views of a scenic vista from View 10 and **no impact** would occur.

View Impact Summary

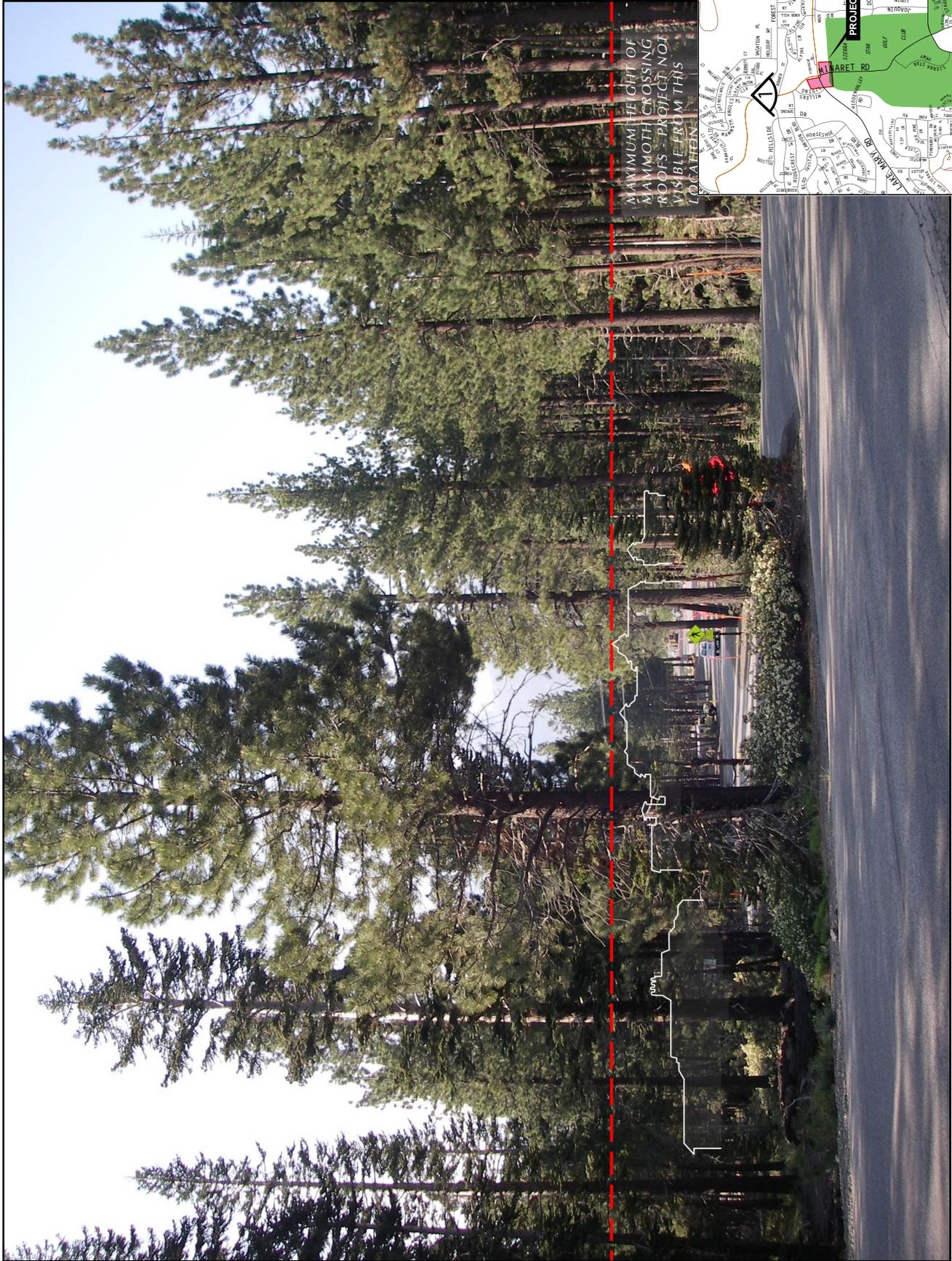
The Project would not obscure public views of scenic vistas from Views 1, 2, 3, 4, 5, 7, 9, and 10. However, views of the scenic Mammoth Knolls from Views 6 and 8 would be partially obscured. The Project would result in substantial changes to views of surrounding scenic Mammoth Knolls, resulting in impacts to public views of scenic vistas. No mitigation measures are available to fully mitigate such impacts. Therefore, impacts to views would be **significant and unavoidable**.



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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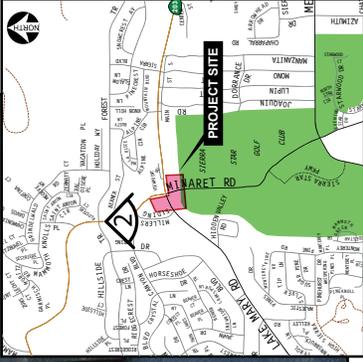
Figure IV.B-4
**View 1: Mammoth Knolls Drive/
Minaret Road Intersection Looking South**
(Before Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-5
View 1: Mammoth Knolls Drive/
Minaret Road Intersection Looking South
(After Project)



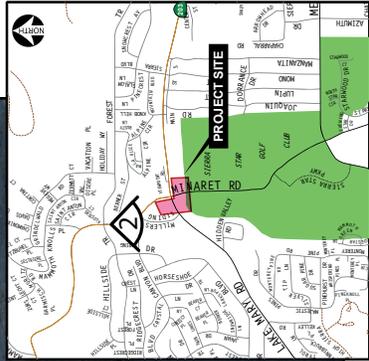
Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-6
View 2: Forest Trail/
Minaret Road Intersection Looking South
(Before Project)



MAXIMUM HEIGHT OF
MAMMOTH-CROSSING
ROOFS - PROJECT NOT
VISIBLE FROM THIS
LOCATION



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-7
View 2: Forest Trail/
Minaret Road Intersection Looking South
(After Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

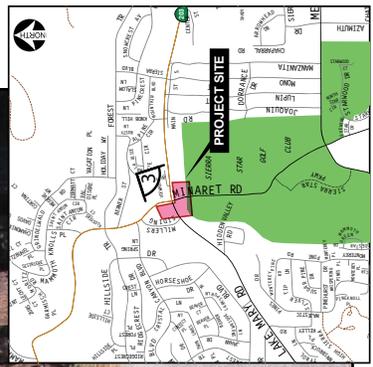
 **CHRISTOPHER A. JOSEPH & ASSOCIATES**
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**View 3: Northeast of the Lake Mary Road-Main Street/
Minaret Road Intersection Looking Southwest
(Before Project)**

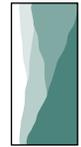
Figure IV.B-8



MAXIMUM HEIGHT OF
MAMMOTH CROSSING
ROOFS - PROJECT NOT
VISIBLE FROM THIS
LOCATION

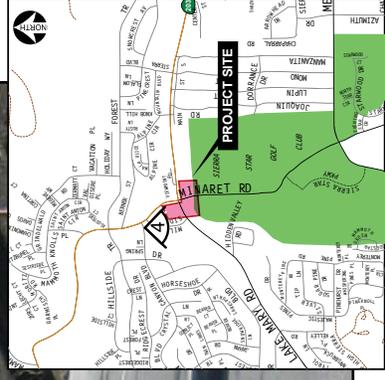


Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.



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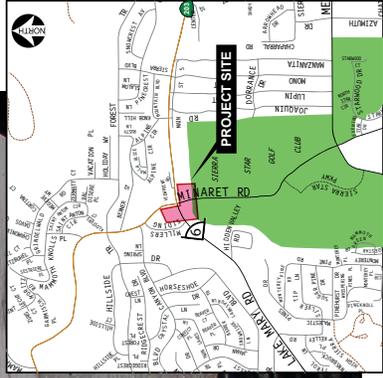
Figure IV.B-9
View 3: Northeast of the Lake Mary Road-Main Street/
Minaret Road Intersection Looking Southwest
(After Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-10
View 4: Canyon Boulevard Looking South
(Before Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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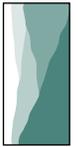
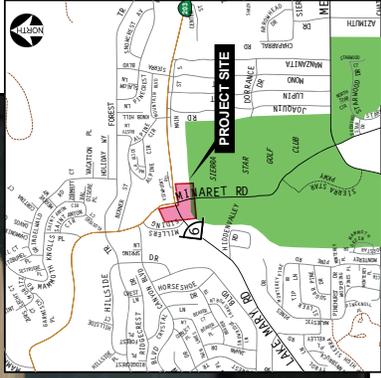


Figure IV.B-14
View 6: Lake Mary Road Near the
Project Site Looking East
(Before Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-15
View 6: Lake Mary Road Near the
Project Site Looking East
(After Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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Figure IV.B-17
View 7: Main Street Commercial
Corridor Looking West
(After Project)

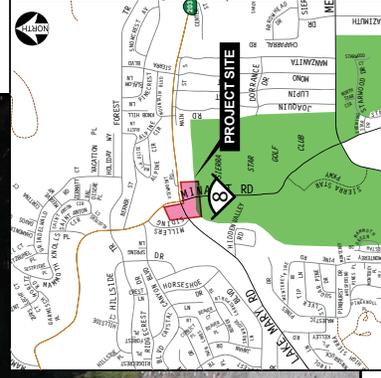


Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

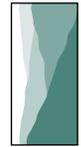


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Figure IV.B-18
View 8: Minaret Road Looking North
(Before Project)

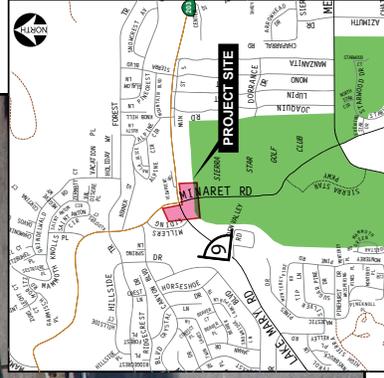


Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.



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Figure IV.B-19
View 8: Minaret Road Looking North
(After Project)



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

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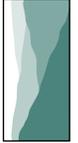


Figure IV.B-20
View 9: Lake Mary Road West
of View 6 Looking Northeast
(Before Project)

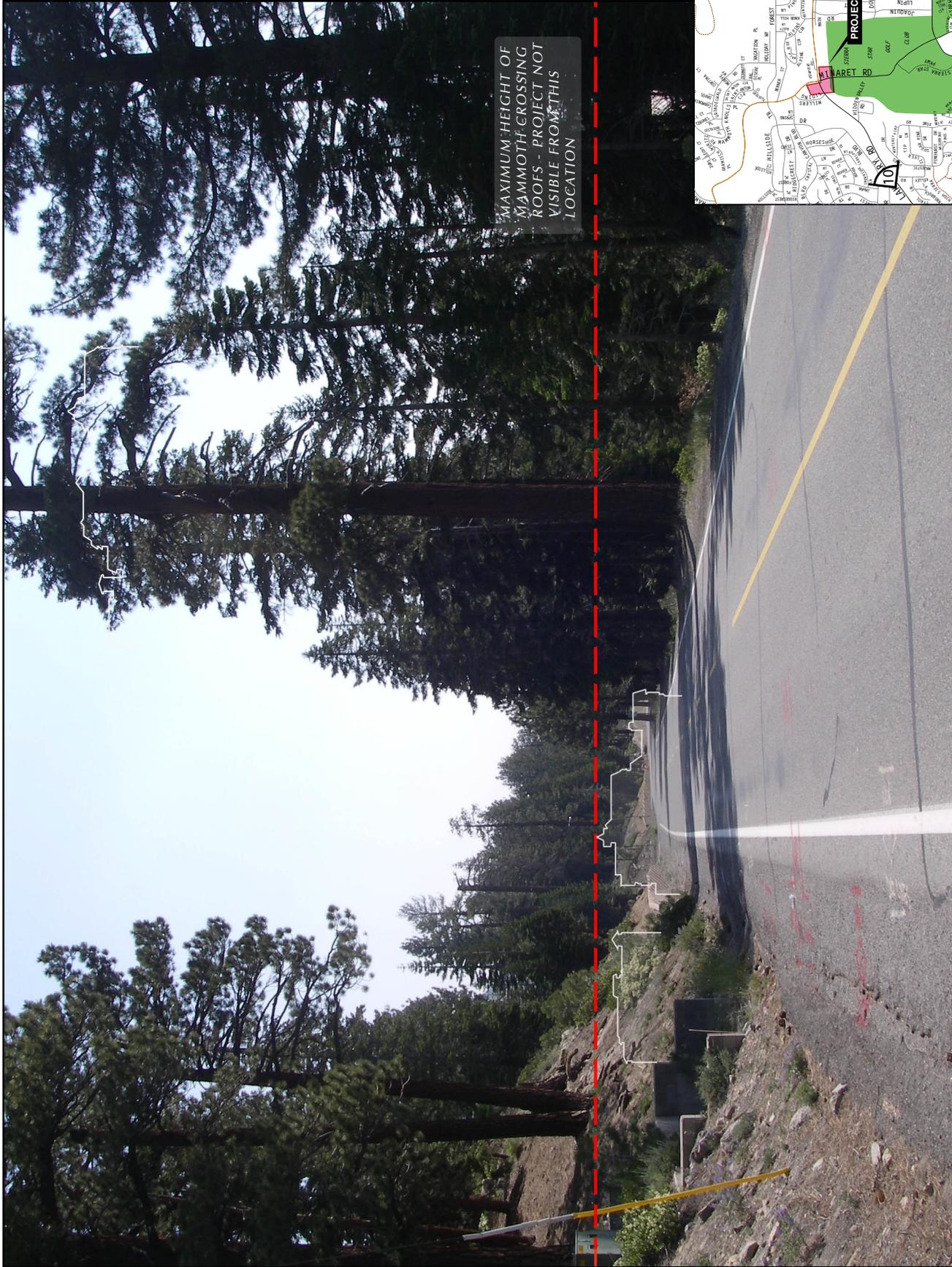


Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.

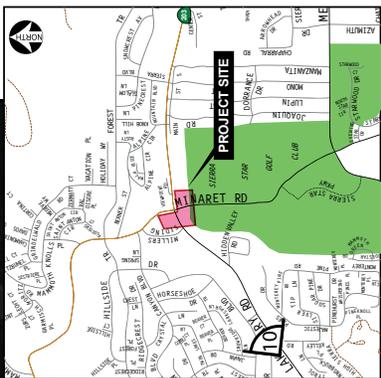
CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



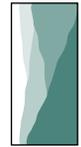
Figure IV.B-21
View 9: Lake Mary Road West
of View 6 Looking Northeast
(After Project)



MAXIMUM HEIGHT OF
MAMMOTH-CROSSING
ROOFS - PROJECT NOT
VISIBLE FROM THIS
LOCATION



Source: Merrick Architecture, Christopher A. Joseph & Associates, July 2008.



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Figure IV.B-23
View 10: Lake Mary Road West of
View 9 Looking Northeast
(After Project)

Impact AES-2 Scenic Resources within a State Scenic Highway

In the vicinity of the Town, State Route 203 (“SR 203”) is an eligible State Scenic Highway (not officially designated) and U.S. Highway 395 is an officially designated State Scenic Highway.⁵ Through the Town, SR 203 is known as Main Street and Minaret Road north of the Lake Mary Road-Main Street/Minaret Road intersection. Visual impacts on SR 203 are included in the above discussion of impacts on public views along Main Street and Minaret Road, which are represented in Views 1, 2, 5 and 7. Significant visual resources that are visible from these represented view points include Mammoth Mountain and the Sherwin Range. As discussed above, the potential impact on views along Main Street and Minaret Road would be ***less than significant*** with the development of the Project. With respect to U.S. Highway 395, the Project would not be visible from any vantage point along its route due to intervening topography and ***no impact*** would occur.

Impact AES-3 Visual Character and Design

Consistency with General Plan Policies Related to Aesthetics

The Project is located within the Specific Plan area, which was adopted in 2000 and amended in 2005 and 2008. As stated above, the Project includes amendments to the Specific Plan, as well as amendments to the General Plan. These amendments will include the definition of a new zoning district within the Specific Plan area. Under the amended Specific Plan, the proposed Mammoth Crossing development would be designated as the "Mammoth Crossing" (MC) zoning district, providing for a range of short-stay accommodation choices, affordable housing, and retail and service uses. The MC zoning district would replace and supersede the existing zoning for the Project. The text and mapping of the Specific Plan would be amended to reflect these changes, including new development standards required to accommodate the Project.

As discussed above, the General Plan sets forth policies and implementation measures to ensure the preservation of the visual resources and visual character of the Town of Mammoth Lakes. A consistency analysis of the Project with applicable aesthetics policies contained within the General Plan as they relate to visual character and overall appearance is presented in Table IV.B-1, Consistency with General Plan Applicable Aesthetics Policies. Additional General Plan policy consistency analysis is presented in Section IV.I, Land Use and Planning, of this Draft EIR, as policies relate specifically to land use.

⁵ California Department of Transportation California Scenic Highway Mapping System, website: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, June 12, 2006.

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
COMMUNITY DESIGN ELEMENT	
Celebrate Public Spaces	
<p>C.2.A Create well-designed and significant public spaces in resort/commercial developments to accommodate pedestrians and encourage social interaction and community activity.</p>	<p>Consistent. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces that are intended to improve the existing conditions which currently do not provide significant public spaces or accommodate pedestrian movement. The Project would include public plaza space featuring outdoor seating and landscaping, designed to promote social interaction and community activity. As described in Section III, Project Description, of this Draft EIR, a key concept of the Project is to provide pedestrian connectivity within the Specific Plan area. As such, building forms have been arranged to provide pedestrian access through the Project sites and to provide gathering spaces within open courtyards and a public plaza. The Project's placement of sidewalks, trails, and paths, and public plazas would aim to connect the hotels and residents with the Town-core, as well as, with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and trails. Pursuant to Specific Plan and <i>Town of Mammoth Lakes Design Guidelines</i>, trails and sidewalks would be appropriately landscaped.</p>
<p>C.2.D Preserve and enhance special qualities of districts through focused attention on land use, community design and economic development.</p>	<p>Consistent. The Project is designed as a mixed-use village and would be consistent with the new design or development standards adopted as part of the amended Specific Plan and Mammoth Crossing District, as well as the Design Guidelines and North Village characteristics. As discussed in Section III, Project Description, of this Draft EIR, the Project would strengthen the North Village's special qualities as a commercial and resort activity node in Mammoth Lakes by emphasizing the mountain environment and distinct small town appearance, maintaining landscape content, and encouraging visual variety. Additionally, the Project would provide hotels, restaurants, visitor-oriented and retail operations, and condominiums. The Project would be designed to complement the existing alpine architectural character of nearby development and improve the design of the existing development parcels in the Specific Plan area. The Project would provide a gateway to the North Village at the Lake Mary Road-Main Street/Minaret Road intersection and would provide open pedestrian plazas on each of the Project's three sites.</p>

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
<p>C.2.E Ensure that each district center is an attractive destination that is comfortable and inviting with sunny streets, plazas and sidewalks.</p>	<p>Consistent. The Project's proposed amenities would include public plazas appropriately landscaped and would connect to both existing and planned pedestrian pathways/trails and bicycle systems from adjacent recreational amenities, outdoor spaces and neighborhoods. As shown in Figures IV.B-26 through IV.B-28, the Project would not shade outdoor plaza, pathways/trails and streets for more than four hours during summer months when outdoor plaza areas are primarily used. During winter months, the Project would shade portions of adjacent roadways for more than three hours. However the majority of the outdoor spaces available to guests and visitors of the Project would not be impacted by shading of the proposed Project. This is discussed in detail under Impact AES-7 Shading/Shadows below. See response to Policy C.2.D.</p>
<p>C.2.F Improve visual appearance as well as pedestrian access and activity by requiring infill development patterns. Encourage rehabilitation and reorientation of existing strip commercial development consistent with neighborhood and district character.</p>	<p>Consistent. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces. The Project would redevelop existing commercial development located on Site 1, the residential and commercial buildings on Site 2, and the vacant Ullr Lodge and White Stag Inn on Site 3 into a clustered village consistent with neighborhood and the North Village district character. The existing development on the Project's three sites consists of an assortment of buildings of various styles, ages, structural conditions and heights. The existing development is primarily focused around large surface parking lots fronting Lake Mary Road and Minaret Road. There is limited street presence and pedestrian amenities associated with the existing development. See response to Policy C.2.A and C.2.D.</p>
<p>C.2.G Ensure that development in commercial areas provides for convenient pedestrian movement between adjoining and adjacent properties.</p>	<p>Consistent. See response to Policy C.2.A and C.2.E. In addition, the Project provides access to existing and planned pedestrian facilities along Minaret Road, Canyon Boulevard, Lake Mary Road, and Main Street.</p>

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
Celebrate the Spectacular Natural Surroundings	
<p>C.2.I Achieve highest quality development that complements the natural surroundings by developing and enforcing design standards and guidelines.</p>	<p>Consistent. The Project would cluster buildings in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. The three hotels would exceed the existing maximum 50-foot height limit and would constitute a substantial intensification of building mass and increase in heights relative to existing development on each of the sites. However, the proposed building ends would be stepped to compensate for the intensification of building mass and height. Project design would be required to conform with requirements of the Specific Plan, as well as the <i>Town of Mammoth Lakes Design Guidelines</i>, and new design or development standards adopted as part of the proposed Specific Plan amendment, applicable to the proposed Mammoth Crossing District. The Project's proposed architecture on each site and overall site planning would be intended to be complementary. Landscaping, public space, and pedestrian access and connectivity would be emphasized throughout the Project. Modifications to existing setback requirements as currently allowed under the Specific Plan are necessary to build the Project as proposed. Setback amendments are proposed as part of the Project. Architectural, signage and landscaping guidelines are included in the Specific Plan and, as such, will be incorporated into the Project. See response to Policy C.2.D.</p>
<p>C.2.J Be stewards in preserving public views of surrounding mountains, ridgelines and knolls.</p>	<p>Generally Consistent. As discussed below under Impact AES-2 Public Views and Scenic Vistas, the Project would partially block public views of the surrounding Mammoth Knolls from certain vantage points; however the Project would not significantly impact the most dominant views in the study area of the Sherwin range to the south of the Project site.</p>
<p>C.2.L Create a visually interesting and aesthetically pleasing built environment by requiring all development to incorporate the highest quality of architecture and thoughtful site design and planning.</p>	<p>Consistent. See response to Policy C.2.D and C.2.I. Additionally, the Project would be consistent with the Specific Plan's intent to encourage visual variety, locate higher density at the edges of the pedestrian core, organize spaces around focal points, and provide distinctive architectural elements such as towers to convey their importance as major public destinations.</p>

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
<p>C.2.N Plan the siting and design of buildings to preserve the maximum amount of open space, trees and natural features to be consistent with themes and district character.</p>	<p>Generally Consistent. The Project would cluster development on each site towards along the edges of major streets to preserve and maximize open, landscaped areas on the interiors of Sites 1, 2, and 3, and transitional vegetated areas to the south in the case of sites 2 and 3. The Project would organize the form and mass of each of its proposed buildings relative to the scale of neighboring buildings and nearer to larger and more dense existing tree-canopy on and adjacent to the site to create a village atmosphere. Building massing and heights would be varied and building ends would be stepped.</p> <p>As part of the approval process, the Town will review the grading plans to assess the need for removal of any trees. Natural features on the Project sites include the sloping terrain and the existing mature trees along the edges of the Project sites. These trees would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3 in compliance with Town Municipal Code Chapter 17.16.050 “Grading and Clearing” which requires the preservation of existing trees and vegetation. The natural topography in the area slopes downward to the south and southwest with the highest elevation being on Site 1 (8,045 elevation) and the lowest elevation being on Site 3 (7,990 elevation). The height of buildings on Site 3 (lowest elevation) would not exceed the height of buildings on Site 1 (highest elevation); therefore the Project would blend with the natural topography. Project site elevations are illustrated on Figures III-5 (Site 1), Figure III-8 (Site 2) and Figure III-11 (Site 3) in Section III, Project Description, of this Draft EIR. Additionally the Town will review all landscaping plans to ensure that some native trees and shrubs are used to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas.</p> <p>See Response to Policy C.2.D, C.2.I, and C.2.L for discussions of consistency with district character.</p>
<p>C.2.O Site development adjustments may be considered to preserve significant groups of trees or individual specimens. Replanting with native and compatible non-native trees to mitigate necessary tree removal is required.</p>	<p>Consistent. See Response to Policy C.2.N.</p>

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
C.2.S Ensure that pedestrian facilities have adequate non-glare lighting, visible signage and markings for pedestrian safety.	Consistent. The Project would include an Outdoor Lighting Plan to ensure compliance with the Town's Lighting Ordinance (Chapter 17.34 of the Municipal Code). Excessive illumination would be avoided and lighting would be designed and placed to minimize glare and reflection. The Project is subject to design review by the Town Community Development Department at the time of Use Permit Application, which would consider the adequacy of signage and markings for pedestrian safety.
Distinctive Architecture	
C.2.T Use natural, high quality building materials to reflect Mammoth Lakes' character and mountain setting.	Consistent. Buildings and structures would incorporate materials that provide a texture of development design appropriate to Mammoth Lakes. Project design would be intended to conform with requirements of the Specific Plan, as well as the <i>Town of Mammoth Lakes Design Guidelines</i> , and new design or development standards adopted as part of the proposed Specific Plan amendment, applicable to the proposed Mammoth Crossing District. See response to Policy C.2.A and C.2.I.
C.2.U Require unique, authentic and diverse design that conveys innovation and creativity and discourages architectural monotony.	Consistent. See response to Policy C.2.D, C.2.I, and C.2.L for discussions of consistency with district character including variety of design.
Comfortable Building Height, Mass, and Scale	
C.2.V Building height, massing and scale shall complement neighboring land uses and preserve views to the surrounding mountains.	Generally Consistent. The Project would cluster development and taller buildings towards the edges of the sites fronting Minaret, Lake Mary Road, and Main Street, and would allow for transitions of scale and height that would complement neighboring land uses. The clustering of development would also provide pedestrian connections to these streets, and allow for some views of the surrounding mountains from each site. As noted above, the Project would partially block public views of the surrounding Mammoth Knolls from certain vantage points, but would not significantly impact views of the Sherwin Range to the south.
C.2.W Maintain scenic public views and view corridors as shown in Figures 1 and 2 that visually connect community to surroundings.	Generally Consistent. See response to Policy C.2.J and C.2.V.
C.2.X Limit building height to the trees on development sites where material tree coverage exists and use top of forest canopy in general area as height limit if no trees on site.	Generally Consistent: According to a tree survey done for the adjacent Sierra Star Master Plan project in January 2007, trees in the area average 90 feet in height (see Appendix M of this Draft EIR). Some of the tower features and tallest portions of buildings on the sites may penetrate the existing forest canopy, or appear above the height of the tree canopy when viewed from certain perspectives. However, when considered across the

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
	entirety of the Project, and because the project proposes to use of stepped building designs, and provide varied rooflines and articulation of heights, the Project, for the most part, would appear consistent with the height of the existing forest canopy in the general area. Also see response to Policy C.2.N.
Community Design and Streetscape	
C.3.B Require distinctive design features at unique sites such as mountain portals, the terminus of a public view and other important public spaces and social gathering places.	Consistent. The Project would provide a gateway to the North Village at the Lake Mary Road-Main Street/Minaret Road intersection. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces that are intended to improve the existing conditions which currently do not provide significant public spaces or accommodate pedestrian movement. In addition, the Town will review the location of the proposed structures, bulk/massing, use of building materials, colors, and landscaping to ensure consistency with the Town Municipal Code which strives to protect major view corridors and major landscape characteristics. See response to Policy C.2.A and C.2.D.
C.3.E Ensure that landscaping, signage, public art, street enhancements and building design result in a more hospitable and attractive pedestrian environment. Require an even higher level of design quality and detail in commercial mixed use areas.	Consistent. See response to Policy C.2.D, C.2.N and C.2.S.
C.3.F Underground utilities within the community.	Consistent. The Project is subject to design review by the Town Community Development Department at the time of Use Permit Application, other departments and divisions, and outside agencies. All utilities would be located underground and would be reviewed by the Town for consistency with Design Guidelines.
Natural Environment	
C.4.A Development shall be designed to provide stewardship for significant features and natural resources of the site.	Generally Consistent. See response to Policy C.2.J , C.2.N. and C.2.X.
C.4.B To retain the forested character of the town, require use of native and compatible plant species in public and private developments and aggressive replanting with native trees.	Consistent. The Project would cluster development along the edges of major streets to preserve and maximize open, landscaped areas on the interiors of Sites 1, 2, and 3. Existing mature trees along the edges of the Sites would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3. However, some trees would be removed as part of the proposed development and grading would occur. Landscape site work would be consistent with traditional approaches for

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
	<p>the region, and would address current needs, Town Municipal Code Chapter 17.38 “Water-Efficient Landscape” regulations and environmental considerations.</p> <p>The Project would comply with the Development and Design Standards set forth in the Specific Plan and the Town’s Design Guidelines as approved by the Planning Commission. As part of the approval process, the Town would review the grading plans to assess the need for removal of any trees. Additionally the Town will review all landscaping plans to ensure that some native trees and shrubs are used to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas. See response to Policy C.2.D, C.2.I and C.2.N.</p>
<p>C.4.C Retain overall image of a community in a forest by ensuring that native trees are protected wherever possible and remain an important component of the community.</p>	<p>Consistent. See response to Policy C.4.B.</p>
<p>C.4.D Retain the forested character of the town by requiring development to pursue aggressive replanting with native trees and other compatible species.</p>	<p>Consistent. See response to Policy C.4.B.</p>
<p>C.4.E Limited tree thinning, and upper-story limbing may be permitted where needed to maintain public safety and the health of the forest but not for the enhancement of views.</p>	<p>Consistent. See response to Policy C.4.B.</p>
<p>Night Sky, Light Pollution, and Glare</p>	
<p>C.5.A Require outdoor light fixtures to be shielded and down-directed so as to minimize glare and light trespass.</p>	<p>Consistent. See response to Policy C.2.S.</p>
<p>C.5.C Improve pedestrian safety by eliminating glare for motorists through use of non-glare roadway lighting. A light fixture’s source of illumination shall not be readily visible at a distance. Number of fixtures used shall be adequate to evenly illuminate for pedestrian safety.</p>	<p>Consistent. See response to Policy C.2.S.</p>
<p>NEIGHBORHOOD AND DISTRICT CHARACTER</p>	
<p>North Village</p>	
<p>The North Village District, in the northwest portion of town adjacent to Main Street, Lake Mary Road, and Minaret Road, is primarily comprised of more urban development. It includes hotels, restaurants, visitor-oriented and general commercial operations, professional and medical offices, condominiums, single family homes and community facilities. The North</p>	<p>Generally Consistent. The Project, as described in detail in Section III, Project Description, of this Draft EIR, would include elements consistent with nearly all the characteristics proposed in the North Village policy by creating a pedestrian-oriented development, contributing to a gateway intersection at Minaret Road and Main Street/Lake Mary Road, and providing resort</p>

**Table IV.B-1
Consistency with General Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
<p>Village is an intensely focused entertainment district. It should incorporate active open pedestrian plazas showcasing mountain views with retail, entertainment, and public art including local talent.</p> <p>North Village characteristics:</p> <ol style="list-style-type: none"> 1. Viewsheds to Sherwin Range and the Knolls are preserved 2. Landscape that recalls the Eastern Sierra and establishes scale and street edge 3. Create a sense of exploration using pedestrian-oriented sidewalks, plazas and courtyards with pedestrian comforts 4. Easy pedestrian access across main streets 5. Gateway intersection at Minaret Road and Main Street/Lake Mary Road 6. Visitor-oriented entertainment retail district 7. Active day and evening through all four seasons, designed to achieve a 2-3 hour visit 8. Resort and resident activities, amenities and services 9. Animation with retail and significant businesses oriented to the street 10. Retail and services in “storefront” setting located at the sidewalk 11. A variety of resort lodging supported by meeting facilities, outdoor activities and restaurants, arts, culture and entertainment 12. Create year-round non-vehicular links to mountain portals 13. Lake Mary Road connected to the North Village District by trails 14. Shared and pooled parking, convenient structured parking and small-scale street adjacent surface parking 15. Encourage living and working in close proximity to transit-oriented development 	<p>and resident amenities. The Project design would create a scale, form, and mass suited to the resort-alpine character of the site and the adjacent land uses. The Project would complement the design of the existing North Village Specific Plan area by being consistent with design for the area, proposing land uses in an efficient fashion, and contributing to the resort environment of the Town.</p> <p>The Project would provide pedestrian and bicycle connections to the North Village and gondola building, and tying into the larger Town-wide recreational trail network for both existing and future trails and paths. Public outdoor spaces would be designed to connect community members and allow for community activities including activities such as art fairs or farmers’ markets. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces. However, while viewsheds to the Sherwin Range are not blocked, the Project would partially block views to the Mammoth Knolls from Lake Mary Road near the Project site looking east (View 6) and Minaret Road looking north (View 8).</p> <p>See response to Policy C.2.A, C.2.D, C.2.E, C.2.G, C.2.J, C.2.V, and C.2.W.</p>

Consistency with the North Village Specific Plan Policies Related to Aesthetics

As discussed above, the Project is located within the Specific Plan boundaries. The Specific Plan designation contains land use districts indicating site-specific land use designations for individual parcels. Site 1 is zoned as Resort General (RG) and Sites 2 and 3 are zoned as Specialty Lodging (SL) in the Specific Plan. The Specific Plan also contains development and design standards describing density, site coverage, building area and heights, building setbacks, and other building design specifications. A consistency analysis of the Project with applicable aesthetics policies contained within the Specific Plan is presented in Table IV.B-2, Consistency with Specific Plan Applicable Aesthetics Policies.

**Table IV.B-2
Consistency with Specific Plan Applicable Aesthetics Policies**

Policy	Consistency Analysis
Overall Land Use Policies	
<p>2 Site-specific development plans shall be sensitive to physical and environmental constraints as well as opportunities created by existing conditions.</p>	<p>Consistent. The Project would cluster buildings in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. Natural features on the Project sites include the sloping terrain and the existing mature trees along the edges of the Project sites. These trees would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3 in compliance with Town Municipal Code Chapter 17.16.050 “Grading and Clearing” which requires the preservation of existing trees and vegetation. The natural topography in the area slopes downward to the south and southwest with the highest elevation being on Site 1 (8,045 elevation) and the lowest elevation being on Site 3 (7,990 elevation). The height of buildings on Site 3 (lowest elevation) would not exceed the height of buildings on Site 1 (highest elevation); therefore the Project would blend with the natural topography. Project site elevations are illustrated on Figures III-5 (Site 1), Figure III-8 (Site 2) and Figure III-11 (Site 3) in Section III, Project Description, of this Draft EIR. See response to General Plan Policy C.2.N.</p>
<p>3 High architectural standards shall be used throughout the North Village Specific Plan Area to create the desired image and promote cohesiveness among development.</p>	<p>Consistent. The Project would cluster buildings in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. See response to General Plan Policy C.2.F, C.2.I. and C.2.L.</p>
<p>6 Landscape plans shall be designed to promote continuity among landscaped areas throughout the project.</p>	<p>Consistent: As described in Section III, Project Description, of this Draft EIR, a key concept of the Project is to provide pedestrian connectivity within the Specific Plan area. As such, building forms have been arranged to provide pedestrian access through the Project sites and to provide gathering spaces within open courtyards and a public plaza. The Project’s placement of sidewalks, trails, and paths, and public plazas would aim to connect the hotels and residents with the Town-core, as well as, with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and trails. Pursuant to Specific Plan and <i>Town of Mammoth Lakes Design Guidelines</i>, trails and sidewalks would be appropriately landscaped. See response to General Plan Policy C.2.N.</p>

7	Building heights and setbacks for proposed development areas shall be coordinated to promote a varied skyline.	Consistent: See response to Specific Plan Policy 3 and General Plan Policy C.2.N.
9	North Village shall appear to be nestled within a forest, with native trees surrounding the pedestrian core and integrated into the development where practical. Building heights shall generally be held at or below the height of surrounding trees. The height standards will reflect this policy. The perimeter of North Village shall have a greater forested feel than the plaza areas due to the different land use objectives between the Specialty Lodging and Plaza Resort areas and the transitional nature between the programmed activity area and the surrounding residential community.	Generally Consistent: See response to General Plan Policy C.2.N and C.2.X.
10	View corridors through North Village shall be protected by establishing building massing and setback requirements. Taller buildings shall be located where they will not block or impede important views of the surroundings from public spaces.	Generally Consistent: See response to General Plan Policy C.2.V.
11	Careful attention should be exercised in the design and detailing of the various storefronts along the pedestrian corridor. Building ornamentation, signs, materials, architectural detailing, outdoor use areas, etc. all must combine to create a rich tapestry of texture, color, and interest. Building frontages should be expressions of individual uses rather than bland homogeneity. Eating and dining activities should be allowed to take place in the public spaces. Plazas should be large enough to accommodate public events, yet feel friendly even when sparsely occupied. A public events program is expected to be developed to coordinate activities throughout the whole year among the Town, North Village homeowner or commercial association(s) and the other resort developments.	Consistent: See response to General Plan Policy C.2.A.

Form, Mass, and Scale

The Project would aim to organize the form and mass of each of its proposed buildings relative to the scale of neighboring buildings and the surrounding tree-canopy. The bulk of each of the hotels are below the forest canopy and only some of the towers of the hotels on the sites may penetrate the existing forest canopy. As described previously under Impact AES-1, the Project would partially block views of the Mammoth Knolls from the View 6 and View 8 locations. The three hotels, as previously described, would exceed the maximum 50-foot height limit and would constitute a substantial intensification of building mass and increase in heights relative to existing development on each of the sites. Building

massing and heights would be varied and building ends would be stepped. Each hotel would be built over understructure parking. The Town would review all final proposed building designs to ensure that the Project would be responsive and expressive of its unique alpine setting. The Project will take into consideration neighboring building colors when using strong, deep trim colors on doors and structural details.

Project design would be intended to conform with requirements of the Specific Plan, as well as the Design Guidelines, and new design or development standards adopted as part of the proposed Specific Plan amendment, applicable to the proposed Mammoth Crossing District. The Project's proposed architecture on each site and overall site planning would be intended to be complementary. Landscaping, public space, and pedestrian access and connectivity would be emphasized throughout the Project. Pedestrians and vehicles would be separated as much as possible for safety and convenience. As previously described, modifications to existing setback requirements as currently allowed under the Specific Plan are necessary to build the Project as proposed. Setback amendments are proposed as part of the Project.

Landscape Design and Planting

The overall style and landscape of all three sites would feature materials and forms associated with the Eastern Sierras and Mammoth Lakes area. The Project would appear to be nestled in the forest and would retain, and protect during construction activities, existing native trees where possible. Site 1 has fewer standing trees than Site 2 and Site 3. The Project proposes to remove trees on all three sites as illustrated on Figure III-17, Tree Retention/Tree Removal Plan, in Section III, Project Description, of this Draft EIR.

Site 1 landscaping would preserve the majority of existing trees along the northern border to provide a forested transition between the proposed new development and the adjacent Fireside Condominiums. In addition, the majority of the existing trees throughout the proposed public plaza area and along the Lake Mary Road border would also be preserved. Site 1 would remove approximately five to ten existing trees.

Site 2 landscaping would preserve the majority of the existing trees along the southern border. Development on Site 2 would result in the removal of approximately 40 to 50 trees. The trees that would be removed are located on the northern portion of the site that is currently developed. The majority of trees that would remain would preserve the forested transition to the adjacent Hidden Valley Condominiums and Sierra Star Golf Course.

Site 3 landscaping would preserve the majority of trees along the western border to preserve the forested transition between adjacent Holiday Haus Inn and the Sierra Star Golf Course. Site 3 landscaping would remove approximately 80 to 100 trees.

Where new plantings are proposed, the Project would use native plants that are indigenous and adapted to the Mammoth Lakes region. New landscaping would be provided on all three sites throughout the pedestrian transition areas and public plazas.

Landscape site work would be consistent with traditional approaches for the region, and would address current needs, Town Code Chapter 17.38 “Water-Efficient Landscape” regulations , Chapter 17.16.050 “Grading and Clearing” regulations and environmental considerations. Landscaping would be designed to enhance user experience, safety, and enjoyment. The Project would comply with the Development and Design Standards set forth in Specific Plan and the Design Guidelines as approved by the Planning Commission.

Grading and Drainage

The Project would develop the grades and topographic forms needed to achieve necessary grades for siting buildings in relationship to utility extensions, roads, and pedestrian areas per the Specific Plan and the Town Municipal Code Chapter 12.08 “Land Clearing, Earthwork, and Drainage Facilities” requirements. Grading would be done to create natural-looking slopes that have diversity in gradient and profile where feasible. All grading operations would be carefully managed to blend into to adjacent non-graded areas and protect existing trees.

Signage

The Project would provide signage that is designed to be clear, understandable and attractive to both the vehicular and pedestrian viewer. The signage would reflect the mountain retreat community character of the Project with regard to materials, form and use. Signage would inform and direct, but in a manner and style which is intended to create a memorable impression and show a connection to nature, architecture and the historic past. Signage would link together the entire resort, clubs, and residential components, and cultivate an inclusive relationship throughout the Project site. The Project is required to comply with the Town Municipal Code Chapter 17.34 and 17.40, which states that prior to the issuance of building permits, all buildings containing three or more separate businesses shall prepare a Master Sign Plan.

Visual Character Summary

This analysis is based on conceptual designs for the Project. As detailed in the preceding discussion, the Project would be designed to complement the existing alpine architectural character of nearby development and elsewhere within the Town. As indicated in Table IV.B-1 and Table IV.B-2 above, the Project would be generally consistent with the applicable policies associated with aesthetics in the adopted General Plan and Specific Plan. While the General Plan does not explicitly prohibit the proposed height increases of the Project’s proposed development, the Specific Plan does. The Project includes amendments to the General Plan and the Specific Plan which would be required to accommodate the Project’s proposed land uses. If approved, the Project would be consistent with the Projects proposed height increases. With respect to the view corridors and scenic vistas, the development of the Project would result in significant impacts from the viewpoints identified as Major View Corridors, Vistas or Landmarks in the General Plan.

As detailed in the preceding discussion, the Project would be designed to complement the existing alpine architectural character of nearby development and throughout the Town. The Town would review all final building designs to ensure that the Project would be responsive to, and expressive of, the unique alpine setting. Therefore, the Project would not degrade the existing character or quality of the Project site and its surroundings, and the associated impact would be *less than significant* and no mitigation measures are required.

Impact AES-4 Light and Glare

A significant impact may occur if a Project introduces new sources of light or glare on the Project site which would be incompatible with the areas surrounding the Project site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Ambient lighting emanating from the existing uses on the Project site contributes to the ambient lighting levels in the surrounding area. The Project site would be illuminated with indoor and outdoor lighting. The lighting needs at the Project site would vary according to the type and intensity of use. Varying illumination levels would be developed which address the particular needs of outdoor spaces and activities: safety, security, vehicular and pedestrian movement, retailing, signage, etc. While, the proposed Project would eliminate the existing source of glare from windshields of parked cars by moving the on-site parking to the subterranean parking levels, the Project would increase the amount of development on the Project site. Therefore, Project implementation would incrementally increase the amount of nighttime lighting and glare to the Project site over existing conditions. Excessive illumination would be avoided and lighting would be designed and placed so as to minimize glare and reflection and to maintain ‘dark skies.’ Development of the proposed Project would include architectural features and façades that have a low level of reflectivity.

A detailed lighting plan for the Project’s development is required to be prepared for approval by the Planning Commission showing location, intensity, heights, fixture type and design, and any other pertinent information with the filing of future Tentative Tract Maps and Use Permit Applications. The Project is required to comply with the design guidelines established for Specific Plan and Town Municipal Code Chapter 17.34 “Outdoor Lighting” regulations. Compliance with applicable regulations would ensure that impacts related to light and glare would be *less than significant* and no mitigation measures are required.

Impact AES-5 Shading/Shadows

A significant shade/shadow impact could occur if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). In addition, a significant impact could occur if the Project required an exception (variance) to the policies and regulations in the

General Plan, Planning Code, or Uniform Building Code, and the exception causes a fundamental conflict with policies and regulations in the General Plan, Planning Code, and Uniform Building Code addressing the provision of adequate light related to appropriate uses. In addition, the shading of roadways for extended periods of time could lead to hazardous roadway conditions such as black ice.

Summer Solstice

Figure IV.B-24 illustrates the summer solstice shadows at 9:00 a.m., 1:00 p.m., and 5:00 p.m. The morning summer solstice shadows are generally cast towards the northwest, then shrink as they move overhead and extend towards the east in the afternoon. As shown in Figures IV.B-24, morning shadows would be cast onto the western portions of Project Sites 1, 2 and 3. The afternoon shadows would be cast onto the eastern portions of Project Sites 1, 2 and 3 and onto the commercial land uses east of Site 1 and east of Site 3, however afternoon shadows would not exceed four hours. Therefore, as summer solstice shadows would not cast onto any shadow-sensitive uses in the Project vicinity, summer solstice shadow impacts would be ***less than significant*** and no mitigation measures are required.

Winter Solstice

Figure IV.B-25 illustrates the winter solstice shadows at 9:00 a.m., 12:00 p.m., and 3:00 p.m. The morning winter solstice shadows are generally cast towards the northwest in the morning, then shrink as they move overhead, and extend towards the northeast in the afternoon.

As shown in Figure IV.B-25, the Project's winter solstice shadows would cast onto a portion of the adjacent residential land use north of Project Site 1 in the morning and throughout the afternoon. However, the usable outdoor spaces associated with the nearby residences (e.g., yards, balconies, etc.) are rarely used in the winter months. Winter solstice shadows would cast onto portions of Lake Mary Road, Main Street and Minaret Street for more than three hours. Shading of these roadways for extended periods of time could lead to hazardous roadway conditions such as black ice. As stated in Section III, Project Description, and Section IV.L, Public Services, of this Draft EIR, the Project Applicant is required to submit a Snow Management Plan ("SMP") designed in accordance with Town Municipal Code Chapter 12.16 "Snow Removal" regulations. The SMP is required to be submitted and approved by the Town and the Mammoth Lakes Fire Protection District prior to the issuance of building permits by the Town. However, even with implementation of the required SMP, winter solstice shadow's hazardous impacts would be potentially ***significant***. However, implementation of the following mitigation measure would reduce winter shade hazardous impacts to a less-than-significant level.

Mitigation Measure AES-5 Shading/Shadows

The Project Applicant shall implement a snow plowing and cindering plan during the three worst-case shadow months of the year at any portion of a pedestrian or vehicular travel-way that receives less than two hours of mid-day sun for more than a week. The Community Development Director shall review the methodology and effectiveness of the plan during its implementation. If it is determined by the Town that

the plan does not adequately reduce hazards resulting from shadows (i.e. black ice), the Town shall require the Project Applicant to install heat traced pavement at any portion of a pedestrian or vehicular travel-way that receives less than two hours of mid-day sun for more than a week.

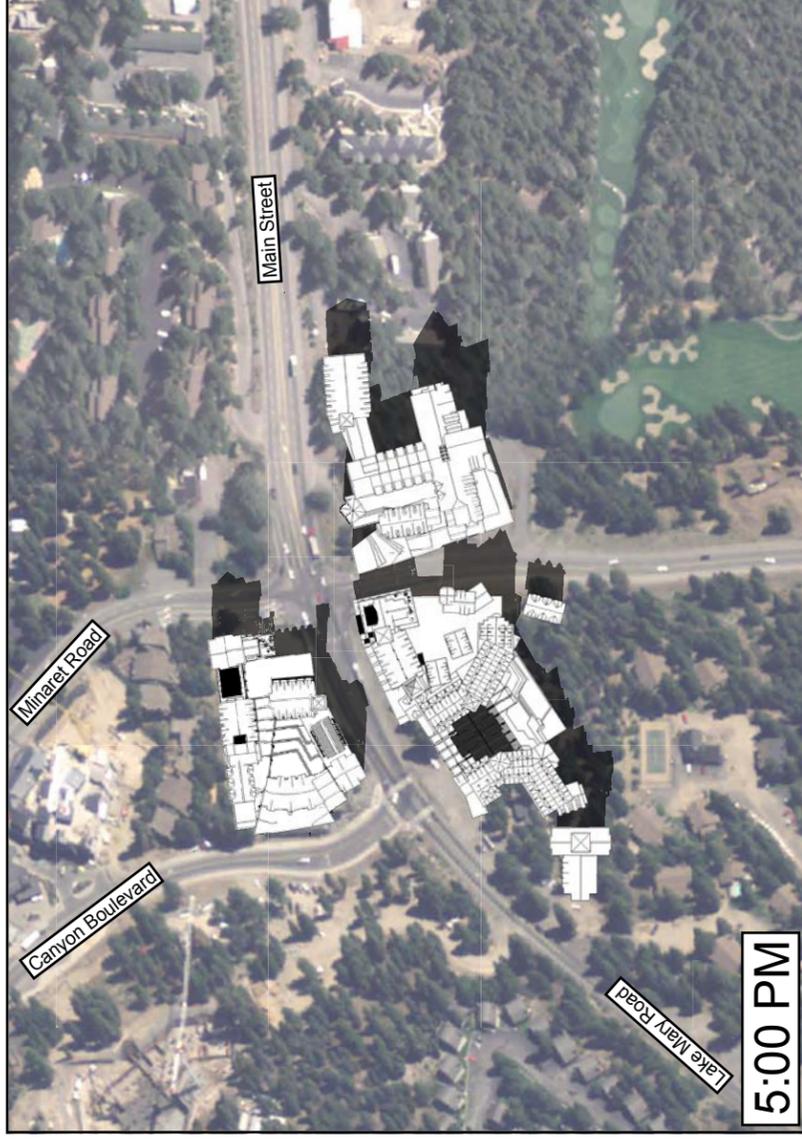
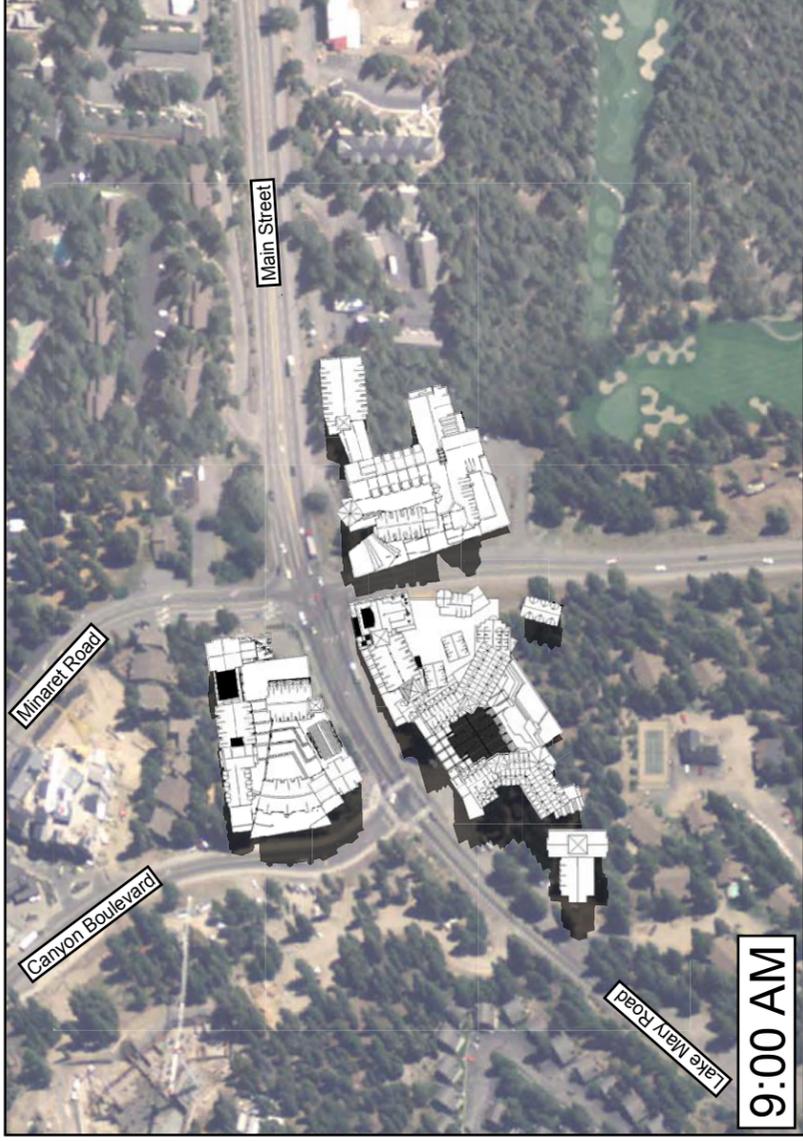
Autumn and Spring Equinox Shadows

Figure IV.B-26 illustrates the equinox shadows at 9:00 a.m., 1:00 p.m., and 5:00 p.m. The morning equinox shadows are generally cast towards the west in the morning, then shrink as they move overhead, and extend towards the east in the afternoon.

As shown in Figure IV.B-26, the Project's equinox shadows would cast onto portions of the adjacent residential and resort land uses to the west of Project Site 1 in the morning and to the east of Project Site 1 and Site 3 on adjacent commercial land uses in the afternoon. However, as stated previously, the equinox shadows depicted in Figures IV.B-28 are for informational purposes only. There are no established thresholds of significance for equinox shadows.

As previously discussed the sensitive shade receptors near the Project site include resort and recreational land uses such as the Sierra Star Golf Course, the Holiday Haus hotel and the nearby residences. However, as noted above, none of these sensitive receptors would be shaded for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

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Source: Google Earth Pro, 2008.



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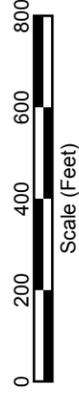
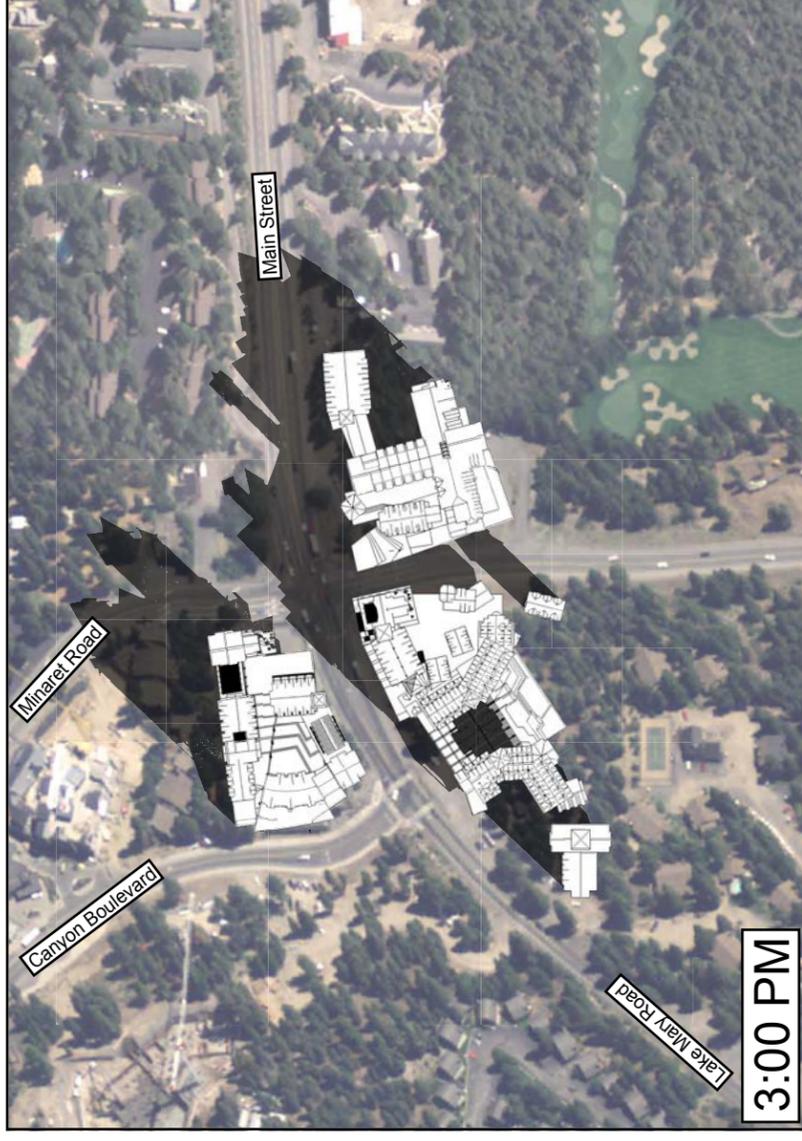
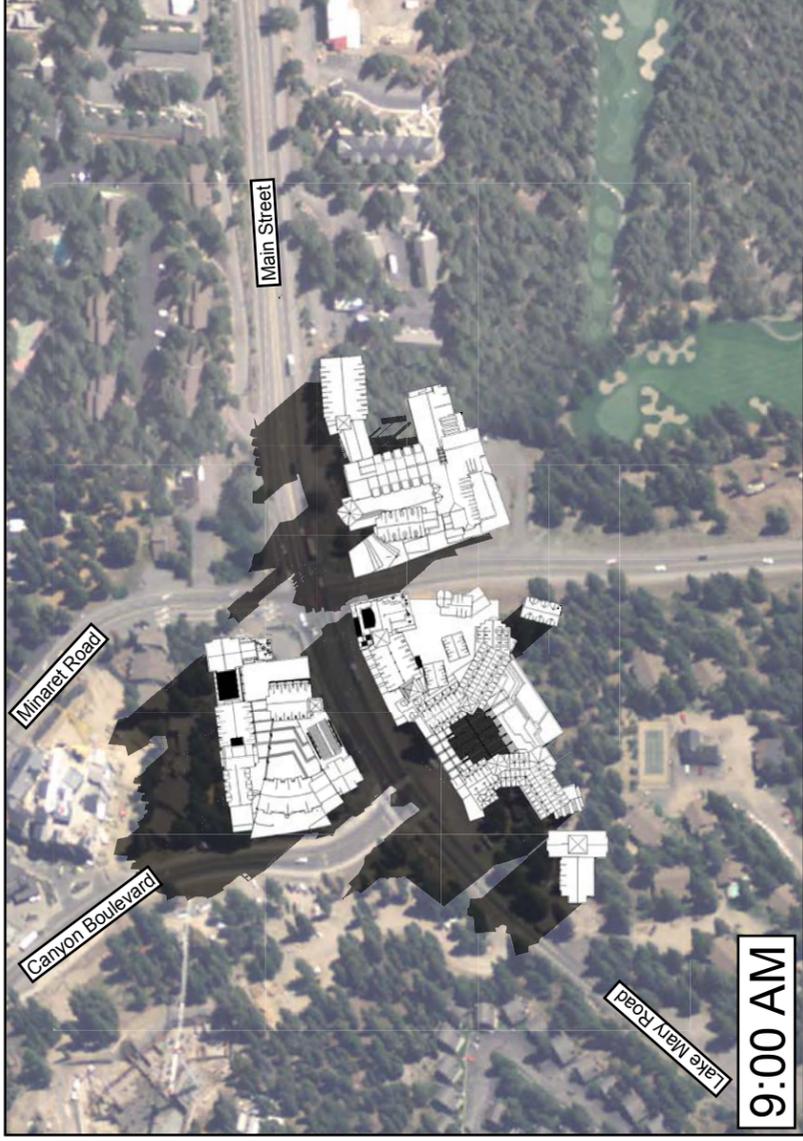


Figure IV.B-24
Summer Solstice Shading
June 21st

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Source: Google Earth Pro, 2008.

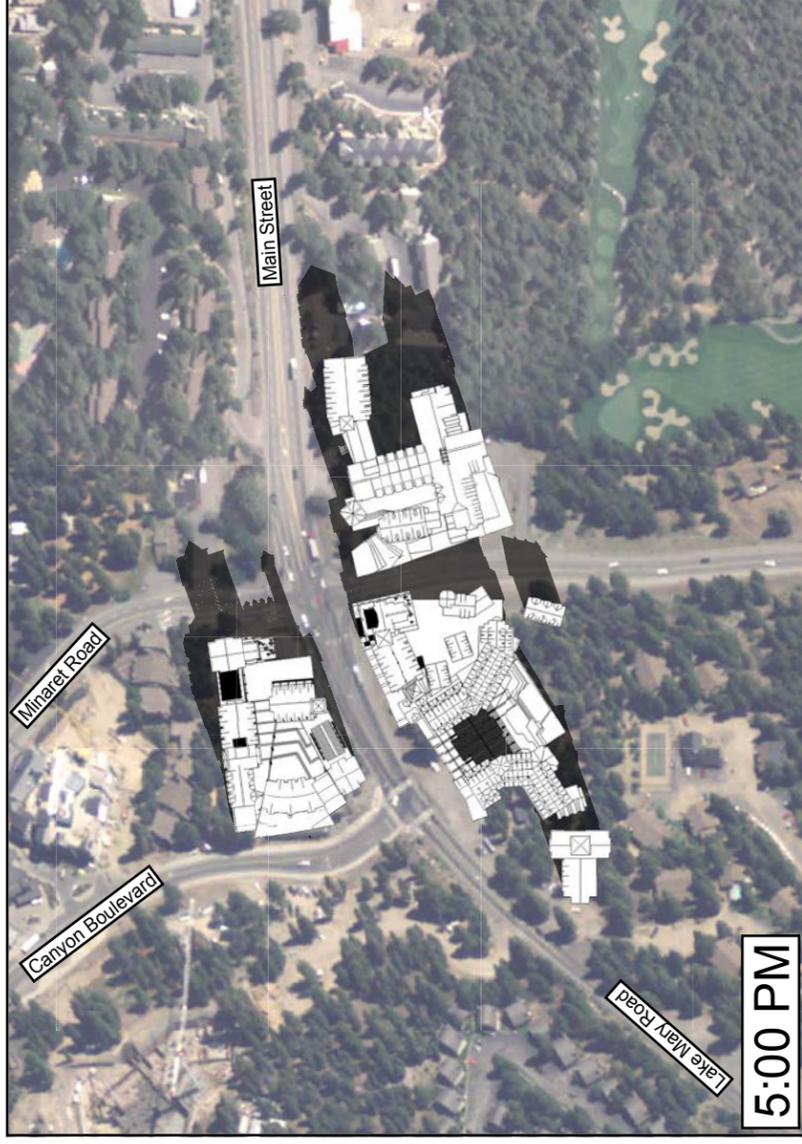
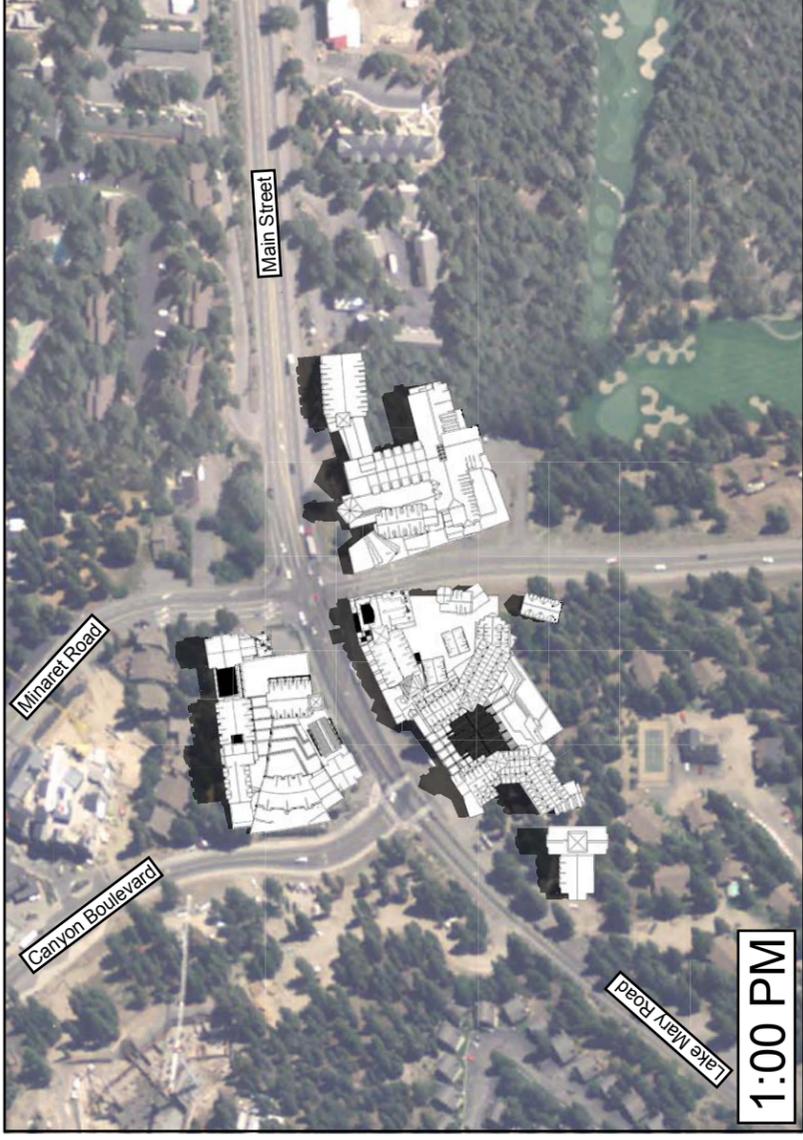
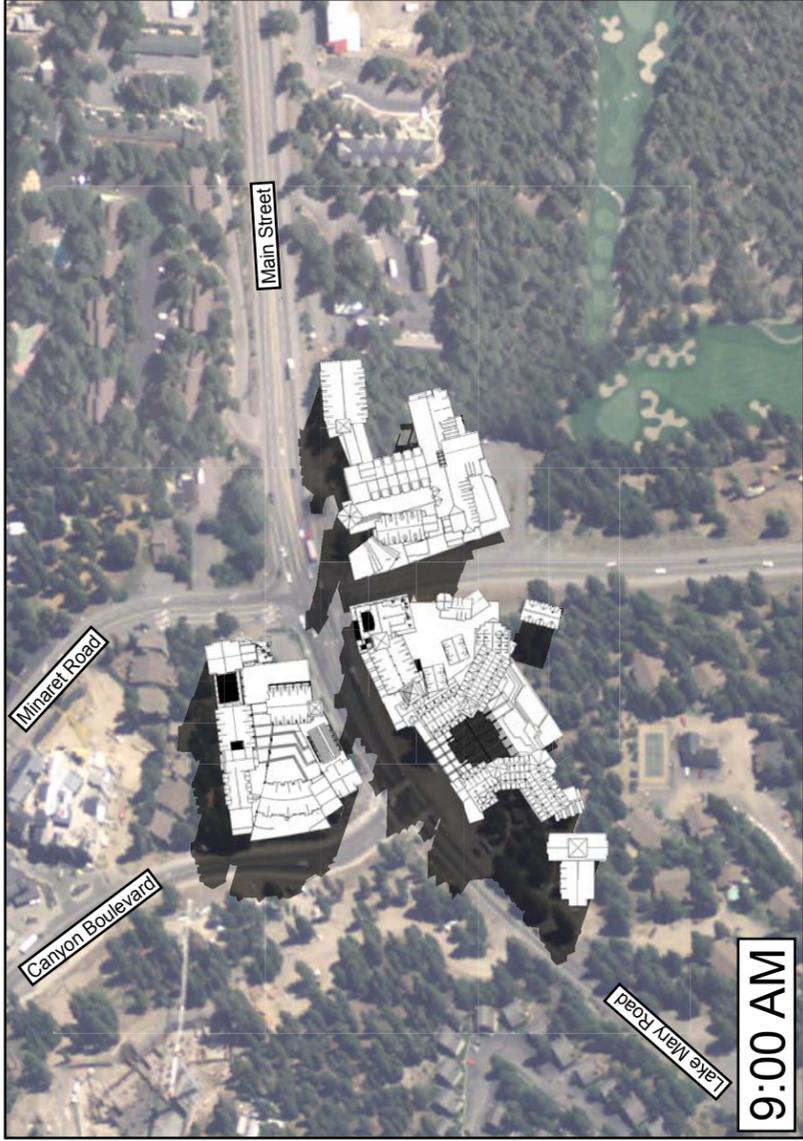


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Figure IV.B-25
Winter Solstice Shading
December 21st

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Source: Google Earth Pro, 2008.



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Figure IV.B-26
Fall Equinox Shading
September 21st

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Impact AES-6 Temporary Construction

The Project would require the demolition and removal of existing on-site development. A description of the demolition of existing structures by site is as follows:

Site 1 would require the demolition of existing man-made features. These include the old Inyo Mono Title building and accessory garage, possibly the operating Whiskey Creek Restaurant⁶ and the paved surface parking. If it is determined that the existing Whiskey Creek Restaurant could be remodeled, it would remain in its current location and would be redesigned to be more space-efficient. The existing sidewalk along Canyon Boulevard and approximately five to ten existing trees would also be removed.

Site 2 would require the demolition or relocation of all existing man-made structures. These include the North Village Inn, some office/retail and storage structures, surface parking and the church. The older buildings on site will be made available to groups who wish to move them off site. Development on Site 2 would result in the removal of approximately 40 to 50 trees. The trees that would be removed are located on the northern portion of the site that is currently developed.

Site 3 would require the demolition or removal of existing man-made vacant structures. These include the Ullr Lodge, the White Stag Inn, paved surface parking areas, and small accessory structures. Site 3 landscaping would remove approximately 80 to 100 trees.

The Project's three sites are surrounded by existing development and or disturbed areas thus, construction activities would be visible from the surrounding land uses, including adjacent residential uses.

During Project construction, dump trucks and other trucks hauling demolition or grading materials from the Project sites would be required to access the site via local roadways. Trucking would also be required for the delivery and removal of excavation equipment, cranes, other machinery, and for the delivery of materials. As with on-site activities, the visual aspect of trucks loaded with debris and/or soils would be interesting to some viewers and unsightly to others. Proposed access to the site for dump trucks, semi-trailers, and truck and trailers in the removal of construction debris and excavated soils and delivery of heavy equipment would occur via Main Street (SR 203) and/or Minaret Boulevard.

Short-term light and glare impacts associated with construction activities would likely be limited to nighttime lighting (for security purposes) in the evening hours. In accordance with Chapter 15.08.020 (hours of working) in the Town's Municipal Code, operations permitted under a building permit would be limited to the hours between 7:00 a.m. and 8:00 p.m., Monday through Saturday. Work hours on Sundays and Town recognized holidays would be limited to the hours between 9:00 a.m. and 5:00 p.m. and

⁶ *It is currently undetermined if the restaurant would be demolished, and the Project does not propose to remove the restaurant.*

permitted only with the approval of the building official or designee. All construction-related lighting would be located and aimed away from adjacent residential areas and would consist of the minimal wattage necessary to provide safety at the construction site. A Construction Safety Lighting Plan would also be submitted to the Town for review concurrent with Grading Permit application. Residential uses adjacent to the site may be impacted as a result of nighttime security lighting used during construction activities; however, construction activities would cease after 8:00 p.m.

The Project has been organized so that it would be developed in several phases. Each phase would stand-alone and operate successfully as a complete entity. Development within each phase is intended to be coordinated with surrounding land uses, vehicular circulation, emergency access routes, and pedestrian bike and trail systems so that visitors are clearly guided and that there are logical transitions within the circulation network. Most phases would last approximately 24 to 36 months. Some phases may be under construction simultaneously. All construction staging would occur within the Project boundaries. Construction activities are proposed to be complete by 2020.

During the construction period, there would be temporary construction fencing to screen most activities from surrounding uses. However, it is likely that construction vehicles and activities would still be visible. Additionally, excavation and demolition activities are likely to require approximately 320 daily truck trips (inbound and outbound), resulting in a potentially *significant* aesthetic impact, especially along Main Street (SR 203) and Minaret Road. Although implementation of Mitigation Measure AES-6 would reduce impacts resulting from construction activities, surrounding residential areas would be exposed to the visually-related construction impacts for an extended period of time. Thus, construction-related visual impacts would be *significant and unavoidable*.

Mitigation Measure AES-6 Temporary Construction

Construction equipment staging areas shall use appropriate screening (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material, when feasible. Staging locations shall be indicated on Final Development Plans and Grading Plans.

CUMULATIVE IMPACTS

Impact AES-7 Cumulative Impacts

The Project site is located in the North Village part of the Town and is surrounded by existing development. There are 40 related projects in the vicinity of the Project. Descriptions of the related projects are located in Table II, Related Projects, in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. Related projects that are close enough to the Project site to have a direct cumulative visual quality impact in combination with the Project include Related Project Numbers 5, 6, 8, 12, 19, and 27 north of Lake Mary Road and Main Street, and 15, 22, and 36

south of Lake Mary Road and Main Street (refer to Figure II-11). Other related projects are scattered throughout the Town and consist of development ranging from ten unit residential projects to larger resort projects. According to the Town, the 40 related projects are generally consistent with respective land use and zoning designations.

As described in this section, the Project although consistent in character with surrounding development would result in significant impacts to public views of the scenic Mammoth Knolls to the northeast of Town. Similar to the Project, each of the related projects proposed in the Project vicinity would be required to conform to Town development regulations and be reviewed against the Town Municipal Code Section 17.32.120 as well as the Town Municipal Code Signs and Outdoor Lighting ordinances, Section 17.40 and Section 17.34, respectively, and the Town's Design Guidelines prior to final approval. However, development of the Project in association with these related projects would result in a gradual infill of existing development in this sector of the Town, which would result in changes in visual character in the area. Therefore, the Project combined with the related projects would result in a cumulative impact to views and the visual character of the Town. As a result, cumulative impacts with respect to scenic views and existing visual character would be considered significant and the Project's incremental contribution to cumulative impacts would be *significant and unavoidable*.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

There are no mitigation measures available to reduce the significant impacts to public views of scenic vistas. Therefore, Project-specific impacts and cumulative impacts with respect to public views and scenic vistas would remain *significant and unavoidable*. Implementation of Mitigation Measure AES-6 Temporary Construction would not fully reduce Project-specific impacts temporary aesthetic construction impacts. Therefore, Project-specific impacts with respect to temporary construction impacts would also remain *significant and unavoidable*.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

C. AIR QUALITY

INTRODUCTION

This section examines the degree to which the Mammoth Crossing Project (“Project”) may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities such as site demolition, grading, building, and haul truck trips, as well as long-term effects related to the ongoing operation of the Project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the actual quantity of pollutant measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

The potential for the Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, to expose sensitive receptors to substantial pollutant concentrations, or to create objectionable odors affecting a substantial number of people are also discussed.

ENVIRONMENTAL SETTING

Project Location

The Project site is located in the Town of Mammoth Lakes (“Town”), Mono County, California. The climate of Mono County is dry with clear skies, excellent visibility, hot summers, and wide fluctuations in daily temperatures. The average minimum temperature is in the upper 20s (degrees Fahrenheit), while the average maximum temperature is in the mid- to high 50s. Most of the precipitation in this area, approximately 70 percent, occurs between November and February. Spring is the windiest season, with fast-moving northerly weather fronts. During the day, southerly winds result from the strong solar heating of the mountain slopes, causing upslope circulation. Summer winds are northerly at night as a result of cool air draining off the mountainsides. The mean annual wind speed in Mammoth Lakes is less than 11 miles per hour (mph). Mean annual wind speeds just outside of Mammoth Lakes at elevations of 8,900 feet and 7,800 feet above sea level are 21.7 and 11.5 mph, respectively.

Sensitive Receptors

Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive receptors to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered

moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function. The nearest sensitive receptors to the Project are residential uses located adjacent to the Project site. In the future, there will also be sensitive residential uses located on adjacent portions of the Project site, since portions of the site are already built and may be occupied while adjacent portions of the site are undergoing construction.

REGULATORY SETTING

The Town is part of the Great Basin Valley Air Basin (“Air Basin”), which is within the Great Basin Unified Air Pollution Control District (“Air District”). Air quality within the Air Basin is addressed through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for regulating and improving the air quality within the Air Basin are discussed below.

Federal

United States Environmental Protection Agency

The United States Environmental Protection Agency (“U.S. EPA”) is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (“SIP”) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

State

California Air Resources Board

The California Clean Air Act (“CCAA”) requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (“CAAQS”) by the earliest practicable date. The California Air Resources Board (“CARB”), a part of the California Environmental Protection Agency (“California EPA”), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local

programs, and prepares the SIP. The CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

California Global Warming Solutions Act

In September 2006, the California Legislature adopted Assembly Bill 32 (“AB 32”), the California Global Warming Solutions Act of 2006. AB 32 requires the CARB to adopt regulations to require the reporting and verification of statewide greenhouse gas (“GHG”) emissions and to monitor and enforce compliance with that program. As part of this effort, the CARB will adopt a statewide GHG emissions limit equivalent to the statewide GHG emissions levels in 1990, to be achieved by 2020. The CARB will develop a scoping plan for the development of the rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions by January 1, 2009. These are expected to include market-based compliance mechanisms. AB 32 requires the CARB to set minimal standards for GHGs. The minimal standards will be the threshold for which GHG emission reduction requirements will not be required. AB 32 would further require the CARB to monitor compliance with and enforce any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism that it adopts. The following timeline for implementation of AB 32 was published by the CARB (September 25, 2006):

By July 1, 2007	The CARB forms Environmental Justice and Economic and Technology Advancement advisory committees.
By July 1, 2007	CARB adopts list of discrete early action measures that can be adopted and implemented before January 1, 2010.
By January 1, 2008	CARB adopts regulations for mandatory greenhouse gas emissions reporting. CARB defines 1990 baseline for California (including emissions from imported power) and adopts that as the 2020 statewide cap.
By January 1, 2009	CARB adopts plan indicating how emission reductions will be achieved from significant sources of greenhouse gases via regulations, market mechanisms and other actions.
During 2009	CARB staff drafts rule language to implement its plan and holds a series of public workshops on each measure (including market mechanisms).
By January 1, 2010	Early action measures take effect.
During 2010	CARB conducts series of rulemakings, after workshops and public hearings, to adopt greenhouse gas regulations including rules governing market mechanisms.
By January 1, 2011	CARB completes major rulemakings for reducing greenhouse gases including market mechanisms. CARB may revise the rules and adopt new ones after 1/1/2011 in furtherance of the 2020 cap.

By January 1, 2012 Greenhouse gas rules and market mechanisms adopted by CARB take effect and are legally enforceable.

December 31, 2020 Deadline for achieving 2020 greenhouse gas emissions cap.

In October 2006, the Governor issued an Executive Order in which he designated the California EPA Secretary with the primary responsibility for implementing AB 32 (rather than providing the CARB with unfettered discretion as the law required). In late December, the Governor announced the members of a blue-ribbon Market Advisory Committee board to devise approaches to develop a market for carbon trading. More developments are likely as the Governor and the Legislature determine who has primary responsibility for implementation and the relationship between regulations and market-based mechanisms.

In response to the Executive Order, the Secretary of California EPA created the Climate Action Team (“CAT”), which, in March 2006, published the *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (the “2006 CAT Report”). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor’s targets are met and can be met with existing authority of the State agencies.

In October 2007, Governor Schwarzenegger signed SB 97, which requires the Governor’s Office of Planning and Research (“OPR”) to prepare CEQA guidelines for the mitigation of GHG emissions. OPR must prepare these guidelines and transmit them to the Resources Agency by July 1, 2009. The Resources Agency must then certify and adopt the guidelines by January 1, 2010. OPR and the Resources Agency are required to periodically review the guidelines to incorporate new information or criteria adopted by the CARB pursuant to AB 32.

Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990 levels, and the present year (2008) is near the midpoint of this timeframe, it is expected that the regulations would affect many existing sources of greenhouse gas emissions and not just new general development projects.

Regional

Great Basin Unified Air Pollution Control District

The Great Basin Unified Air Pollution Control District (“Air District”) is the agency principally responsible for comprehensive air pollution control in the Great Basin Valley Air Basin (“Air Basin”). To that end, the Air District, a regional agency, works directly with county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. The Air District develops rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary. Although the Air District is responsible for regional air quality planning efforts, it does not

have the authority to directly regulate the air quality issues associated with plans and new development projects within the Air Basin.

METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project. Air pollutant emissions associated with the proposed Project have been quantitatively estimated and compared to thresholds of significance.

Air Pollutants

Air pollutant emissions within the Air District are generated by “stationary” and “mobile” sources. Stationary sources can be divided into two major subcategories: “point” and “area” sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples are boilers or combustion equipment that produces electricity or generates heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbeque lighter fluid and hair spray. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Federal and State governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health and welfare. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria that have been adopted for them. The federal and State standards have been set at levels considered safe to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

The criteria air pollutants which are most relevant to current air quality planning and regulation in the Air District include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and lead. In addition, toxic air contaminants and greenhouse gas (GHG) emissions are of concern in the Air Basin. Each pollutant and their health effect are briefly described below.

Criteria Air Pollutants

Ozone (O₃)

Ozone (O₃) is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x)—both by-products of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

Individuals exercising outdoors, children and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for O₃ effects. Short-term exposures (lasting for a few hours) to O₃ at levels typically observed in California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities.

Ozone exposure under exercising conditions is known to increase the severity of the above mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include ozone may be more toxic than exposure to O₃ alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Carbon Monoxide (CO)

Carbon monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. Carbon monoxide concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike O₃—and motor vehicles operating at slow speeds are the primary source of CO in the Air Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving

heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5})

Respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

A consistent correlation between elevated ambient fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of PM₁₀ and PM_{2.5}.

Nitrogen dioxide (NO₂)

Nitrogen dioxide (NO₂) is a by-product of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x (nitrogen oxides). Nitrogen dioxide absorbs blue light and result is a brownish-red cast to the atmosphere and reduced visibility. Nitrogen dioxide also contributes to the formation of PM₁₀.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO₂ at levels

found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO₂ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of O₃ and NO₂.

Sulfur dioxide (SO₂)

Sulfur dioxide (SO₂) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries.

A few minutes exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Sulfates (SO₄²⁻)

Sulfate is a negatively charged ion that occurs as microscopic particles resulting from combustion. The presence of sulfates in the atmosphere increases the acidity and forms acid rain.

Most of the health effects associated with fine particles and SO₂ at ambient levels are also associated with SO₄²⁻. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO₄²⁻ concentrations. However, efforts to separate the effects of SO₄²⁻ from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Lead

Lead occurs in the atmosphere as particulate matter. The combustion of leaded gasoline used to be the primary source of airborne lead in the Air Basin, although the use of leaded gasoline is no longer permitted for on-road motor vehicles. Today the primary sources of airborne lead pollution include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters.

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Toxic Air Contaminants (TACs)

Toxic air contaminants (TACs) refer to a diverse group of “non-criteria” air pollutants that can affect human health, but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. There are hundreds of toxic air contaminants and exposure to these pollutants can cause or contribute to cancer, birth defects, genetic damage, and other adverse health effects.

TACs are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects from TACs may be both chronic and acute on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects result from low-dose long-term exposure from routine releases of air

toxics. The effect of major concern for this type of exposure is cancer, which requires a period of 10-30 years after exposure to develop.¹

TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average).² According to the California Air Resources Board (“CARB”), diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State’s Proposition 65 or under the federal Hazardous Air Pollutants programs. California has adopted a comprehensive diesel risk reduction program. The U.S. EPA has adopted low sulfur diesel fuel standards that will reduce diesel particulate matter substantially. These went into effect in June 2006.

Greenhouse Gas Emissions

Greenhouse Gases (GHG)

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. Greenhouse gases consist of water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆) and aerosols. Some greenhouse gases such as CO₂ are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. A brief description of each of the listed GHGs and their health effect is provided below:

Water vapor (H₂O)

Water vapor (H₂O) is the most abundant, important, and variable greenhouse gas in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the

¹ California Air Resources Board (CARB), *Air Quality Analysis Guidance Handbook, Chapter 3 (Basic Air Quality Information)*, http://www.aqmd.gov/ceqa/handbook/CH3_rev.doc, accessed July 14, 2006.

² South Coast Air Quality Management District (SCAQMD), *Air Toxics Control Plan*, <http://www.aqmd.gov/aqmp/docs/AirToxicsControlPlan.pdf>, accessed July 14, 2006.

warming of the atmosphere rather than a direct result of industrialization.³ The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a greenhouse gas, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that put the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

There are no health effects from water vapor. When some pollutants come in contact with water vapor, they can dissolve and then the water vapor can be a transport mechanism to enter the human body. The main source of water vapor is evaporation from the oceans (approximately 85 percent). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.

Carbon dioxide (CO₂)

Carbon dioxide (CO₂) is an odorless, colorless natural greenhouse gas. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. Current concentrations of carbon dioxide in the ambient air are about 370 parts per million (ppm). The National Institute for Occupational Safety and Health (NIOSH) reference exposure level is 5,000 ppm, averaged over 10 hours in a 40-hour workweek. The short-term reference exposure level is 30,000 ppm, averaged over 15 minutes. At those levels, potential health problems are as follows: headache, dizziness, restlessness, paresthesia; dyspnea (breathing difficulty); sweating, malaise (vague feeling of discomfort); increased heart rate, cardiac output, blood pressure; coma; asphyxia; and/or convulsions.⁴

Carbon dioxide is emitted from natural and anthropogenic (human) sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. In 1999, the concentration of carbon dioxide in the atmosphere was 367 ppm, which is an increase from the concentration during the Industrial Era (1750) of 280 ± 10 ppm.⁵ The concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by

³ U.S. Environmental Protection Agency (EPA) 2006b.

⁴ National Institute for Occupational Safety and Health, 2005.

⁵ Intergovernmental Panel on Climate Change (IPCC), 2001, Chapter 3.

2100 as a direct result of anthropogenic sources.⁶ Some predict that this will result in an average global temperature rise of at least 2° Celsius.⁷ Sinks are mechanisms by which a gas or aerosol is taken out of the atmosphere. Carbon dioxide is removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks.

Methane (CH₄)

Methane (CH₄) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other greenhouse gases. Methane is not toxic. The immediate health hazard is that it may cause burns if it ignites. It is highly flammable and may form explosive mixtures with air. Methane is violently reactive with oxidizers, halogens, and some halogen-containing compounds. Methane is also an asphyxiant and may displace oxygen in an enclosed space.⁸

Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane.⁹ Other anthropocentric sources include fossil-fuel combustion and biomass burning.

Nitrous oxide (N₂O)

Nitrous oxide (N₂O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is harmless. In some cases, heavy and extended use can cause Olney's Lesions (brain damage). Concentrations of N₂O also began to rise at the beginning of the Industrial Revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load.¹⁰ It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction.

⁶ *Intergovernmental Panel on Climate Change (IPCC), 2001, Chapter 3.*

⁷ *Ibid.*

⁸ *Occupational Safety and Health Administration (OSHA), 2003.*

⁹ *U.S. Environmental Protection Agency, 2006b.*

¹⁰ *Ibid.*

Chlorofluorocarbons (CFCs)

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs are no longer being used; therefore, it is not likely that health effects would be experienced. Nonetheless, in confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.¹¹

CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years (NOAA 2005).

Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Of all the greenhouse gases, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order) HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂).¹² Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each.¹³ Concentrations of HFC-152a are about 1 ppt.

Most HFCs do not have health effects associated with them. For example, 1, 1- difluoroethane (HCFC-152A), does not have any adverse health effects.¹⁴ However, HFC-134a has a chronic inhalation exposure of 80 milligrams per cubic meter (mg/m³); the critical effect is Leydig cell hyperplasia.¹⁵ HFCs are man-made for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons (PFCs)

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆).

¹¹ National Institute for Occupational Safety and Health, 1989.

¹² U.S. Environmental Protection Agency, 2006j.

¹³ Ibid.

¹⁴ U.S. Environmental Protection Agency, 1994.

¹⁵ U.S. Environmental Protection Agency, 1995.

Measurements in 2000 estimate global concentrations of CF₄ in the stratosphere are over 70 parts per trillion (ppt).¹⁶

High concentrations of CF₄ can cause confusion, dizziness, or headache and may cause effects on cardiovascular system, resulting in cardiac disorders.¹⁷ The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur Hexafluoride (SF₆)

Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest global warming potential (GWP) of any gas evaluated, 23,900. Concentrations in the 1990s were about 4 ppt.¹⁸ In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Aerosols

Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. The health effect of aerosols is similar to particulate matter, discussed above. Sulfate aerosols are emitted when fuel with sulfur in it is burned. Black carbon (or soot) is emitted during bio mass burning and incomplete combustion of fossil fuels. Particulate matter regulation has been lowering aerosol concentrations in the United States; however, global concentrations are likely increasing greenhouse gas emissions.

Global Climate Change

The issue of global climate change alleged to be caused by GHG emissions is currently one of the most important and widely debated scientific, economic, and political issues in the United States. Climate change is a shift in the “average weather” that a given region experiences. This is measured by changes in temperature, wind patterns, precipitation, and storms, including the potential for more extreme or more frequent severe weather conditions. While the effects of global climate change may occur on a global, regional, or local basis, the impacts are believed to result from changes in the global climate of the Earth as a whole. Global climate change can occur naturally, as in the case of an ice age.

¹⁶ U.S. Environmental Protection Agency, 2006j. (EPA), *High Global Warming Potential Gases. Science.* <http://www.epa.gov/highgwp/scientific.html>, CAJA staff accessed August 20, 2007.

¹⁷ National Institute for Occupational Safety and Health, 1997.

¹⁸ U.S. Environmental Protection Agency, 2006j (EPA), *High Global Warming Potential Gases. Science.* <http://www.epa.gov/highgwp/scientific.html>, CAJA staff accessed August 20, 2007.

Simply put, the greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. Greenhouse gases keep the average surface temperature of the Earth close to a hospitable 60 degrees Fahrenheit. Without the greenhouse effect, the Earth would be a frozen globe with an average surface temperature of about 5 degrees Fahrenheit. If global warming occurs, ambient air quality could potentially worsen. High temperatures, strong sunlight, and a stable air mass are ideal for formation of ground-level ozone. This is damaging to plants and humans. In addition, rainfall patterns could change; resulting in more frequent droughts and flashfloods, and the snow pack in the Sierra Nevada, which provides much of California's water supply, could be reduced.

Scientists have shown that the concentration of these gases in the atmosphere can impact temperature by "trapping" heat within the Earth's atmosphere because these greenhouse gases absorb longwave radiation emitting from the Earth's surface; therefore, an increase in the concentration of greenhouse gases will result in a corresponding increase in the amount of radiation contained within the Earth's atmosphere. Oxygen and nitrogen, the primary components of the Earth's atmosphere, do not absorb longwave radiation.

Based on the potential increase in longwave radiation contained within the atmosphere (the so-called "greenhouse effect"), some believe that the accumulation of these gases in the Earth's atmosphere is the cause of the observed increase in the Earth's temperature (global warming) over recent decades. The potential health effects from global climate change may be from temperature increases, climate-sensitive diseases, extreme events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems. Heat related problems include heat rash and heat stroke. In addition, climate sensitive diseases may increase, such as those spread by mosquitoes and other disease carrying insects. Those diseases include malaria, dengue fever, yellow fever, and encephalitis. Extreme events such as flooding and hurricanes can displace people and agriculture, which would have negative human health consequences including the spreading of disease and death. Global climate change may also contribute to air quality problems from increased frequency of smog and particulate air pollution.¹⁹

Global Warming Potential (GWP)

Greenhouse gases have varying global warming potential ("GWP"). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the "cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas."²⁰ One teragram of carbon dioxide equivalent (Tg CO₂ Eq.) is essentially the emissions of the gas multiplied

¹⁹ Association of Environmental Professionals, *Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA Documents (Final)*, June 29, 2007.

by the GWP. One teragram is equal to one million metric tons. The carbon dioxide equivalent is a good way to assess emissions because it gives weight to the GWP of the gas. A summary of the atmospheric lifetime and GWP of selected gases is summarized in Table IV.C-1. As shown in the table, GWP ranges from 1 to 23,900.

**Table IV.C-1
Global Warming Potentials and Atmospheric Lifetimes**

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide (CO ₂)	50 - 200	1
Methane (CH ₄)	12 ± 3	21
Nitrous Oxide (N ₂ O)	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF ₄)	50,000	6,500
PFC: Hexafluoroethane (C ₂ F ₆)	10,000	9,200
Sulfur Hexafluoride (SF ₆)	3,200	23,900

Source: U.S. Environmental Protection Agency, <http://www.epa.gov/nonco2/econ-inv/table.html>, updated Oct. 19, 2006.

Inventory

An analysis of data compiled by the United Nations Framework Convention on Climate Change (“UNFCCC”) indicates that in 2004, total worldwide GHG emissions were 20,135 teragram of carbon dioxide equivalent (Tg CO₂ Eq.), excluding emissions/removals from land use, land use change, and forestry.²¹ In 2004, the United States (“U.S.”) contributed the most GHG emissions (35 percent of global emissions). In 2004, total GHG emissions in the U.S. were 7,074.4 Tg CO₂ Eq., which is an increase of 15.8 percent from 1990 emissions.²² In 2005, total U.S. GHG emissions were 7,260.4 Tg CO₂ Eq.²³ Overall, total U.S. emissions have risen by 16.3 percent from 1990 to 2005, while the U.S. gross domestic product has increased by 55 percent over the same period.²⁴ Emissions rose from 2004 to 2005, increasing by 0.8 percent (56.7 Tg CO₂ Eq.). The main causes of the increase include: (1) strong

²⁰ U.S. Environmental Protection Agency. 2006l.

²¹ United Nations Framework Convention on Climate Change (UNFCCC), Greenhouse Gas Emissions Data, Predefined Queries, Annex I Parties - GHG total without LULUCF (land use, land-use change, and forestry), http://unfccc.int/ghg_emissions_data/predefined_queries/items/3841.php, 2006.

²² U.S. Environmental Protection Agency (EPA), Office of Atmospheric Programs, April 2006. *The U.S. Inventory of Greenhouse Gas Emissions and Sinks: Fast Facts.* <http://epa.gov/climatechange/emissions/downloads06/06FastFacts>.

²³ U.S. Environmental Protection Agency (EPA), *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2005, Executive Summary, April 15, 2007, USEPA #430-R-07-002.* <http://www.epa.gov/climatechange/emissions/downloads06/07CR.pdf>, ES-4.

²⁴ *Ibid.*

economic growth in 2005, leading to increased demand for electricity and (2) an increase in the demand for electricity due to warmer summer conditions.²⁵ However, a decrease in demand for fuels due to warmer winter conditions and higher fuel prices moderated the increase in emissions.²⁶

California is a substantial contributor of global GHGs as it is the second largest contributor in the U.S. and the twelfth to sixteenth largest in the world.²⁷ During 1990 to 2003, California's gross state product grew 83 percent while GHG emissions grew 12 percent. While California has a high amount of GHG emissions, it has low emissions per capita. In 2004, California produced 492 Tg CO₂ Eq.²⁸, which is approximately seven percent of U.S. emissions. The major source of GHG in California is transportation, contributing 41 percent of the state's total GHG emissions.²⁹ Electricity generation is the second largest generator, contributing 22 percent of the state's GHG emissions.

Emissions from fuel use in the commercial and residential sectors in California decreased 9.7 percent over the 1990 to 2004 period.³⁰ According to the California Energy Commission ("CEC"), the decrease in greenhouse gases demonstrates the efficacy of energy conservation in buildings (Title 24 requirements) and appliances. The new 2005 Title 24 Standards will further reduce greenhouse gas emissions. The decrease in GHGs attributed to these sources is even more substantial when the population increase in California is considered.

Currently, there is no known GHG emission data for the Great Basin Unified Air Pollution Control District or for the Town. However, naturally-occurring carbon dioxide emissions in the vicinity of the Town have been identified. In 1990, it was recognized that magmatic gasses were killing trees in certain portions of the caldera. The trees were killed by high carbon dioxide flux in the soil gasses surrounding their roots. The most well known location of high carbon dioxide soil gas is at the north end of Horseshoe Lake where scientists estimate between 50 and 150 tons of carbon dioxide are emitted daily.

Federal and State Ambient Air Quality Standards

As required by the Federal Clean Air Act ("FCAA"), the National Ambient Air Quality Standards ("National AAQS") have been established for six major air pollutants: carbon monoxide (CO), nitrogen oxides (NO_x), ozone (O₃), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur

²⁵ *Ibid.*

²⁶ *Ibid.*

²⁷ California Energy Commission (CEC), December 2006, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 Staff Final Report, CEC-600-2006-013-SF.*, <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>.

²⁸ *Ibid.*

²⁹ *Ibid.*

³⁰ California Energy Commission (CEC), December 2006, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 Staff Final Report, CEC-600-2006-013-SF.*, <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>

oxides (SO₂), and lead. The California Ambient Air Quality Standards (“California AAQS”) apply to these same six criteria. The California AAQS are more stringent than the National AAQS and, in the case of PM₁₀ and SO₂, far more stringent. Federal and State standards are summarized in Table IV.C-2. Federal and State standards for these pollutants establish upper limits that protect all segments of the population, including those most susceptible to the pollutants’ adverse effects (e.g., children, the elderly, people weak from illness or disease, or persons doing heavy work or exercise). The U.S. EPA develops and is responsible for updating the National AAQS, and the CARB is responsible for establishing the California AAQS.

**Table IV.C-2
Ambient Air Quality Standards**

Air Pollutant	Averaging Time	State Standard	Federal Standard
Ozone	1 Hour	0.09 ppm	—
	8 Hour	0.07 ppm	0.08 ppm
Carbon Monoxide	1 Hour	20.0 ppm	35.0 ppm
	8 Hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide	1 Hour	18 ppm	—
Sulfur Dioxide	1 Hour	0.25 ppm	—
	24 Hour	0.04 ppm	0.14 ppm
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³
PM _{2.5}	24 Hour	—	35 µg/m ³

Notes:
 ppm = parts per million by volume
 µg/m³ = micrograms per cubic meter
 — = no standard exists for this category
 (1) The lead standard is not listed because of the phase-out of leaded gasoline. Atmospheric lead remains a toxic air contaminant, but unless there is reason to suspect lead in the source emissions there is no reason to analyze for it.

Source: California Air Resources Board, Ambient Air Quality Standards, website:
<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, November 2, 2007.

Regional Air Quality Standards

Air quality in Mammoth Lakes is monitored by the Air District. This Air Basin consists of Inyo, Mono, and Alpine Counties. Spot monitoring conducted by CARB for this area in 1972 identified particulates as the most probable air quality problem for the Air Basin. As a result, particulate monitoring stations were set up to monitor PM₁₀ in the Air Basin. Currently, there are 12 monitoring sites in the Air Basin, including one station in Mammoth Lakes at the Gateway (Rite Aid) Center. Data reported for the years 2003 to 2006 for particulate matter are summarized in Table IV.C-3.

Table IV.C-3
PM₁₀ and PM_{2.5} Concentrations in the Mammoth Lakes Region

	24-Hour Maximum Concentration		Annual Average Concentration		Days Above National/State Standard	
	PM _{2.5}	PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}	PM ₁₀
Regulatory Standards						
California	N/A	50	12	20	N/A	N/A
National	65	150	15	50	N/A	N/A
Monitoring Data						
2003: Gateway Home Center	34	74	N/A	N/A	0	0/1
2004: Gateway Home Center	27	86	N/A	24.1	0	0/3
2005: Gateway Home Center	27	85	N/A	24.7	0	0/6
2006: Gateway Home Center	N/A	78	N/A	20.2	N/A	0/3
2007: Gateway Home Center	N/A	67	N/A	17.8	N/A	0/3
<i>Notes:</i>						
(1) All concentrations in $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter						
(2) N/A = there was insufficient (or no) data available to determine the value						
<i>Source: CARB, 2006.</i>						

Ozone and CO monitoring data was also collected at the Mammoth Lakes Gateway Home Center monitoring station as presented in Table IV.C-4. Table IV.C-4 indicates that from 2000 to 2004 (the most recent available data at the time of this Draft EIR), the Gateway Home (Rite Aid) Center monitoring station did not report any violations of the California or NAAQS for CO.

The maximum one hour concentration recorded at the Mammoth Lakes – Gateway Home Center station for O₃ was reported as 0.1 ppm. The Gateway Home (Rite Aid) Center monitoring station did report four days in exceedance of the California standard for ozone in 2001. The maximum eight-hour CO concentration measured at the Mammoth Lakes monitoring station was 0.083 ppm in 2003 and 2004. Exceedances of the ozone standard have occurred predominantly at night. In addition, the 2001 CARB

transport review found that the San Joaquin Valley was the major contributor to the Mammoth Lakes ozone standard exceedances.³¹

**Table IV.C-4
Ambient Air Quality Ozone and Carbon Monoxide Standards and Monitoring Data
Near the Project Area**

	Ozone		CO	
	1-hour (ppm)	8-hour (ppm)	1-hour (ppm)	8-hour (ppm)
Regulatory Standards				
California	0.09	0.07	20.0	9.0
National	N/A	0.08	35.0	9.0
Monitoring Data				
2000: Gateway Home Center	N/A	N/A	4.2	2.5
2001: Gateway Home Center	0.100	N/A	15.4	2.5
2002: Gateway Home Center	0.071	N/A	3.8	1.8
2003: Gateway Home Center	0.088	0.083	N/A	N/A
2004: Gateway Home Center	0.092	0.083	N/A	N/A
<i>Notes:</i> ppm = parts per million N/A = not available or not applicable				
<i>Source: CARB (http://www.arb.ca.gov/adam/welcome.html) and CARB Almanac 2005 – Appendix B.</i>				

Attainment Status

Effective January 23, 2005, the Mono County portion of the Air Basin has a nonattainment designation for O₃ (State standard only). All of the Air Basin is designated in nonattainment of the federal PM₁₀ standard. The Mammoth Lakes area and Mono County are considered in attainment of all other federal and State standards. Therefore, discussion of impacts for this Project will focus on those pollutants which are designated as non-attainment (O₃ and PM₁₀). Although Mono County is categorized as nonattainment of the State O₃ standard, there is no ozone implementation plan for attaining the ozone standard in Mono County, nor is one required as outlined in the 2001 CARB Ozone transport review. Instead, the document states “Transport from the central portion of the (San Joaquin) Valley is responsible for ozone violations in Mammoth Lakes.”³²

A Draft Air Quality Management Plan (“AQMP”) for the Town was released on January 19, 1990. The AQMP identified PM₁₀ sources and mitigation that could be instituted to attain the National AAQS. The AQMP, prepared by the Air District, is required under the FCAA and will become part of the State Implementation Plan (“SIP”) to attain Federal standards. The AQMP identifies exceedances of the PM₁₀ standard that occur predominantly in the winter due to increased emissions from wood stoves, fire places, and traffic related road dust and cinders used for de-icing roads. This change is also fueled largely by the

³¹ Town of Mammoth Lakes, General Plan Update EIR, October 2005, p. 4-23.

³² Town of Mammoth Lakes, General Plan Update EIR, October 2005, p. 4-23.

influx of visitors to the Mammoth Lakes area during ski season. The combination of periods of meteorological stagnation and peak periods at the ski resorts result in violations of PM₁₀ standards. The AQMP includes a control strategy to satisfy the FCAA requirement by demonstrating how the Mammoth Lakes area will meet and maintain the National AAQS for PM₁₀ by requiring that vehicle miles traveled (“VMT”) per day in the Town of Mammoth Lakes not exceed 106,600 and requiring all new residential developments be limited to one solid fuel burning appliance per unit. These requirements are based on calculations provided in Appendix I of the AQMP.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the *CEQA Guidelines*, the proposed project would have a significant environmental impact on air quality if it would:

- (a) Conflict with or obstruct implementation of the applicable air quality plan;
- (b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- (c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- (d) Expose sensitive receptors to substantial pollutant concentrations; or
- (e) Create objectionable odors affecting a substantial number of people.

Global Climate Change

There are currently no adopted thresholds or guidance to assess the significance of this impact. Global climate change is an international phenomenon; the regulatory background and scientific data are changing rapidly.

Nonetheless, the Californian Environmental Protection Agency Climate Action Team developed a report that “proposes a path to achieve the Governor’s targets that will build on voluntary actions of California business, local government and community actions, and State incentive and regulatory programs” (the “CAT 2006”). The report indicates that the strategies will reduce California’s emissions to the levels proposed in Executive Order S-3-05. If the project is not consistent with those strategies that the lead agency deems are feasible, then a project could potentially be deemed to have a significant impact with regards to global climate change.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Threshold (e) listed above were determined to result in no impact. Therefore, only Thresholds (a) through (d) listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes’ General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. In-Town affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

The Project would be located near public transportation stops and would include a shuttle, as well as pedestrian connections to encourage the use of alternative modes of transportation. The Project is located adjacent to the Gondola, a mountain portal. All these measures would advance shopping locally and using alternative modes of transportation to access commercial and retail needs, which would result in a reduction of vehicle trips that would support the implementation of regional air quality goals.

Project Impacts and Mitigation Measures

Impact AQ-1 Construction Emissions

Foreseeable construction activities for the Project would include site preparation, grading, placement of utilities and other infrastructure, placement of foundations for structures, removal of existing structures, and fabrication of structures across the entire approximately nine-acre developed Project area. Construction activities typically require the use of heavy trucks, excavating and grading equipment,

concrete breakers, concrete mixers, and other mobile and stationary construction equipment. Emissions during grading and construction would be caused by material handling, traffic on unpaved or unimproved surfaces, use of paving materials and architectural coatings, exhaust from construction worker vehicle trips, and exhaust from diesel-powered construction equipment.

Heavy construction activity on dry soil exposed during construction phases through 2020 could cause emissions of dust (usually monitored as PM₁₀). Reactive organic gases (ROGs,) nitrogen oxides (NO_x), carbon monoxide (CO), and additional particulate matter emissions also would be created from the combustion of diesel fuel by heavy equipment and construction worker vehicles. Throughout the construction phases, construction-related emissions would vary day-to-day depending on the specific construction phase. Construction-related activities associated with the Project would result in dust and equipment exhaust emissions that could, at times, contribute to nuisances to adjacent residential uses. In addition, the Project would be developed in separate phases, so there may be portions of the Project sites that are built and occupied while adjacent portions of the Project sites are undergoing construction.

Construction projects using typical grading and construction equipment, such as dump trucks, scrapers, bulldozers, compactors, front-end loaders, fork lifts, and cranes which temporarily emit precursors of ozone (e.g., ROGs or NO_x), are already included in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone ambient air quality standards. Mono County is classified as attainment for all California AAQS, except ozone (O₃) and respirable particulate matter (PM₁₀), and all National AAQS except PM₁₀. However, there is no O₃ implementation plan for attainment in Mono County, nor is one required as outlined in the 2001 CARB Ozone Transport Review.³³ The primary source of O₃ in the Town is from precursor pollutants NO_x and volatile organic compounds (VOCs) originating from the San Joaquin Valley. Weather conditions in the San Joaquin Valley are ideal for the production of O₃. As stated earlier, air movements and prevailing winds carry the O₃ into Mono County and subsequently, Mammoth Lakes. Under California State law, the CARB determines the contribution of transported pollution as overwhelming, significant, inconsequential, or some combination of the three. The CARB Ozone Transport Review states that; “Transport from the central portion of the (San Joaquin) Valley is responsible for ozone violations in Mammoth Lakes . . .” and that the resulting impacts on the Town’s air quality were classified as “overwhelming.”

The maximum 1-hour O₃ concentration recorded at the Mammoth Lakes Station during the 2000 to 2005 period was 0.1 ppm, which was recorded in 2001. During the reported period, the California standard of 0.09 ppm was exceeded 4 times in 2001; the federal standard of 0.12 ppm was not exceeded during this time. The maximum 8-hour O₃ concentration was 0.09 ppm, which was recorded in 2001. During the same period, the federal standard of 0.08 ppm was exceeded two times in 2001. Prior to the above

³³ California Air Resources Board, 2001, page 45.

exceedances, the Mammoth Lakes Gateway monitoring station had not recorded an exceedance since 1995.

All of California is in non-attainment for PM₁₀ under both State and federal standards. The maximum reported PM₁₀ concentration at the Mammoth Lakes – Gateway Home Center monitoring station was 134 micrograms per cubic meter (ug/m³) recorded in 2001. Between 2000 and 2005 the California AAQS for PM₁₀ was exceeded two to five times per year. Therefore, this analysis is primarily focused on the two common pollutants of O₃ and PM₁₀.

The development of the Project's three sites has been organized so that it could be developed in several phases, with most phases lasting approximately 24 to 36 months. Each phase would operate successfully as a complete entity throughout the entire development. All staging would occur within the Project boundaries. Some phases may be under construction simultaneously. Construction activities are proposed to be complete in 2020.

The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model. Data sheets for the URBEMIS modeling are provided in Appendix K of this Draft EIR. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table IV.C-5 identifies daily emissions that are estimated to occur on peak construction days associated with each of the Project's three sites.

**Table IV.C-5
Estimated Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 1 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	9	1.88
Off-Road Diesel Equipment	2.83	23.44	11.96	0.00	1.17	1.08
On-Road Diesel Equipment	5.00	74.62	25.46	0.11	3.22	2.73
Worker Trips	0.03	0.06	1.02	-	0.01	0.00
Total Emissions	7.86	98.12	38.43	0.11	13.40	5.69
Site 1 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.11	8.51	4.68	0.00	0.54	0.50
Building Vendor Trips	0.08	1.02	0.88	0.00	0.05	0.04
Building Construction Worker Trips	0.28	0.48	8.83	0.01	0.07	0.03
Architectural Coatings Off-Gas	65.91	-	-	-	-	-
Architectural Coatings Worker Trips	0.02	0.04	0.67	0.00	0.01	0.00
Asphalt Off-Gas	0.05	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.61	10.07	6.79	0.00	0.83	0.77
Asphalt On-Road Diesel Equipment	0.01	0.12	0.04	0.00	0.01	0.00
Asphalt Worker Trips	0.05	0.08	1.53	0.00	0.01	0.01
Total Emissions	69.12	20.32	23.42	0.01	1.52	1.35

**Table IV.C-5
Estimated Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 2 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	31.20	6.52
Off-Road Diesel Equipment	2.03	14.69	9.80	0.00	0.68	0.62
On-Road Diesel Equipment	1.76	21.30	8.15	0.06	1.02	0.80
Worker Trips	0.02	0.03	0.64	0.00	0.01	0.00
Total Emissions	3.81	36.02	18.60	0.07	32.91	7.94
Site 2 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	2.63	12.97	9.89	0.00	0.82	0.76
Building Vendor Trips	0.11	1.18	1.18	0.00	0.06	0.05
Building Construction Worker Trips	0.35	0.61	11.64	0.01	0.11	0.06
Architectural Coatings Off-Gas	112.16	-	-	-	-	-
Architectural Coatings Worker Trips	0.03	0.05	0.91	0.00	0.01	0.01
Asphalt Off-Gas	0.10	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.8	11.29	8.72	0.00	0.88	0.81
Asphalt On-Road Diesel Equipment	0.01	0.15	0.06	0.00	0.01	0.01
Asphalt Worker Trips	0.03	0.07	1.38	0.00	0.02	0.01
Total Emissions	117.22	26.32	33.78	0.01	1.91	1.71
Site 3 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	27.6	5.76
Off-Road Diesel Equipment	2.03	14.69	9.80	0.00	0.68	0.62
On-Road Diesel Equipment	1.36	16.36	6.26	0.05	0.78	0.61
Worker Trips	0.02	0.03	0.64	0.00	0.01	0.00
Total Emissions	3.40	31.08	16.70	0.05	29.07	7.00
Site 3 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.98	10.41	9.21	0.00	0.6	0.55
Building Vendor Trips	0.04	0.43	0.51	0.00	0.03	0.02
Building Construction Worker Trips	0.14	0.25	4.93	0.01	0.06	0.03
Architectural Coatings Off-Gas	58.49	-	-	-	-	-
Architectural Coatings Worker Trips	0.01	0.02	0.72	0.00	0.01	0.00
Asphalt Off-Gas	0.08	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.48	9.28	8.57	0.00	0.66	0.61
Asphalt On-Road Diesel Equipment	0.01	0.09	0.04	0.00	0.00	0.00
Asphalt Worker Trips	0.03	0.05	1.10	0.00	0.02	0.01
Total Emissions	62.26	20.53	24.72	0.01	1.37	1.23
<i>Note: Subtotals may not appear to add correctly due to rounding in the URBEMIS 2007 model.</i>						
<i>Source: Christopher A. Joseph & Associates, 2008. Calculation sheets are provided in Appendix K of this Draft EIR.</i>						

As shown, development of the Project would result in the generation of pollutant emissions. However, the Air District does not currently have thresholds for determining the level of significance for air emissions. In the absence of such thresholds, any emissions that may result in a violation of an air quality standard or contribute substantially to an existing air quality violation will be considered significant. Since PM₁₀ is classified as non-attainment, any PM₁₀ emissions will contribute substantially to an existing

air quality violation. Therefore, unless PM₁₀ emissions are reduced by implementation of feasible control measures, impacts caused by these emissions would be considered significant. As a result, in the absence of mitigation measures, construction activities at the Project site would result in potentially *significant* air quality impacts.

Mitigation Measures AQ-1 Construction Emissions

In compliance with Rule 401 and 402, the Project applicant shall require that the following practices be implemented by including them in the contractor construction documents to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the Project construction phases:

- a. Water all construction areas at least twice daily; water trucks will be filled locally after the contractor makes water acquisition agreements and obtains any required permits.
- b. Cover all trucks hauling soil, sand, and other loose materials;
- c. Apply clean gravel, water, or non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites;
- d. Remove excess soils from paved access roads, parking areas and staging areas at construction sites;
- e. Sweep streets daily (with mechanical sweepers) if visible soil material is carried onto adjacent public streets;
- f. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more);
- g. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.);
- h. Install gravel-bags, cobble entries, or other Best Management Practices (BMPs) and erosion control measures to prevent silt runoff to public roadways;
- i. Replant vegetation in disturbed areas as soon as possible;
- j. Install wheel washers for all exiting trucks or wash off the tires or tracks of all trucks and equipment leaving the construction site;
- k. Suspend excavation and grading activities when wind (as instantaneous gusts) exceeds 25 miles per hour (mph) and when sustained winds exceed 25 mph increase the frequency of watering from twice daily, as described in Mitigation Measure AQ-1a above, to three to four times a day;
- l. The construction fleet will meet the terms set forth in the CARB Proposed Regulation for in-use Off Road Diesel Vehicles, paragraph (d)(3) Idling. The proposed regulation implementation date is May 1, 2008.

- m. Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use;
- n. All equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications;
- o. When feasible, alternative fueled or electrical construction equipment shall be used for the Project site;
- p. Use the minimum practical engine size for construction equipment;
- q. Gasoline-powered equipment shall be equipped with catalytic converters, where feasible; and
- r. Incorporate BMP's during construction of the Project site.

As shown below in Table IV.C-6, even with implementation of the recommended mitigation measures outlined above, development of the Project would continue to result in the generation of pollutant emissions. In addition, PM₁₀ emissions cannot be reduced to zero with the implementation of the recommended mitigation measures. Therefore, the Project would continue to result in a **significant and unavoidable** impact with regard to PM₁₀ emissions.

Table IV.C-6
Estimated Mitigated Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 1 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	3.32	0.69
Off-Road Diesel Equipment	2.83	23.44	11.96	0.00	1.17	1.08
On-Road Diesel Equipment	5.00	74.62	25.46	0.11	3.22	2.73
Worker Trips	0.03	0.06	1.02	-	0.01	0.00
Total Emissions	7.86	98.12	38.43	0.11	7.72	4.50
Site 1 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.11	8.51	4.68	0.00	0.54	0.5
Building Vendor Trips	0.08	1.02	0.88	0.00	0.05	0.04
Building Construction Worker Trips	0.28	0.48	8.83	0.01	0.07	0.03
Architectural Coatings Off-Gas	64.42	-	-	-	-	-
Architectural Coatings Worker Trips	0.02	0.04	0.67	0.00	0.01	0.00
Asphalt Off-Gas	0.05	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.61	10.07	6.79	0.00	0.83	0.77
Asphalt On-Road Diesel Equipment	0.01	0.12	0.04	0.00	0.01	0.00
Asphalt Worker Trips	0.05	0.08	1.53	0.00	0.01	0.01
Total Emissions	67.63	20.32	23.42	0.01	1.52	1.35

**Table IV.C-6
Estimated Mitigated Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 2 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	11.51	2.40
Off-Road Diesel Equipment	2.03	14.69	9.80	0.00	0.68	0.62
On-Road Diesel Equipment	1.76	21.30	8.15	0.06	1.02	0.80
Worker Trips	0.02	0.03	0.64	0.00	0.01	0.00
Total Emissions	3.81	36.02	18.60	0.07	13.22	3.83
Site 2 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.98	10.41	9.21	0.00	0.6	0.55
Building Vendor Trips	0.08	0.81	0.95	0.00	0.05	0.03
Building Construction Worker Trips	0.27	0.47	9.23	0.01	0.11	0.06
Architectural Coatings Off-Gas	96.43	-	-	-	-	-
Architectural Coatings Worker Trips	0.02	0.03	0.7	0.00	0.01	0.01
Asphalt Off-Gas	0.15	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.48	9.28	8.57	0.00	0.66	0.61
Asphalt On-Road Diesel Equipment	0.01	0.17	0.07	0.00	0.01	0.01
Asphalt Worker Trips	0.03	0.05	1.10	0.00	0.02	0.01
Total Emissions	100.45	21.22	29.83	.01	1.46	1.28
Site 3 - Site Grading and Excavation						
Fugitive Dust	-	-	-	-	11.81	2.47
Off-Road Diesel Equipment	2.03	14.69	9.80	0.00	0.68	0.62
On-Road Diesel Equipment	1.36	16.36	6.26	0.05	0.78	0.61
Worker Trips	0.02	0.03	0.64	0.00	0.01	0.00
Total Emissions	3.40	31.08	16.70	0.05	13.28	3.70
Site 3 - Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.98	10.41	9.21	0.00	0.60	0.55
Building Vendor Trips	0.04	0.43	0.51	0.00	0.03	0.02
Building Construction Worker Trips	0.14	0.25	4.93	0.01	0.06	0.03
Architectural Coatings Off-Gas	51.44	-	-	-	-	-
Architectural Coatings Worker Trips	0.01	0.02	0.38	0.00	0.01	0.00
Asphalt Off-Gas	0.08	-	-	-	-	-
Asphalt Off-Road Diesel Equipment	1.48	9.28	8.57	0.00	0.66	0.61
Asphalt On-Road Diesel Equipment	0.01	0.09	0.04	0.00	0.00	0.00
Asphalt Worker Trips	0.03	0.05	1.10	0.00	0.02	0.01
Total Emissions	55.22	20.53	24.72	0.01	1.37	1.23
<i>Note: Subtotals may not appear to add correctly due to rounding in the URBEMIS 2007 model.</i>						
<i>Source: Christopher A. Joseph & Associates, 2008. Calculation sheets are provided in Appendix K of this Draft EIR.</i>						

Impact AQ-2 Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project site after occupation. Stationary area source emissions would be generated by the consumption of propane for space and water heating devices, cooking appliances, and fireplaces,

the operation of landscape maintenance equipment, the use of consumer products, and the application of architectural coatings (paints). Mobile emissions would be generated by the motor vehicles traveling to and from the Project site.

The Mammoth Lakes portion of the Air Basin is designated as nonattainment for O₃ (State standard only) and as a nonattainment area for PM₁₀ (State and federal standards). As discussed previously, however, the O₃ impact in Mammoth Lakes is primarily the result of pollution generated in the San Joaquin Valley, transported by air currents and winds over the Sierra Nevada and is not a condition substantially generated by activities and sources in the Town. In fact, exceedances of the O₃ standard would likely occur without any contribution of emissions of O₃ precursors (nitrogen oxides and hydrocarbons) from Town activity. In the absence of any quantifiable thresholds of significance from the Air District, as well as the demonstrated condition in which local O₃ levels are created by emissions generated outside the Town and reach levels in excess of State standards only in the evening, the increase in O₃ precursor emissions as a result of implementation of the Project would not substantially contribute to the exceedances of the State O₃ standard.

According to the AQMP, particulate matter that causes PM₁₀ violations consists primarily of road dust and soot from wood combustion. In other words, tailpipe emissions from heavy-duty diesel engines constitute a minor or negligible component of PM₁₀ impacts in the Mammoth Lakes area. In addition, motor vehicle emissions such as those used in snow-removal equipment have been greatly reduced since the AQMP analysis was completed because State and federal programs now require the use of low-sulfur diesel fuel as of 2006. When fully implemented in 2020, heavy duty on road diesel engines will be up to 95 percent cleaner than today's models. As a result, CARB estimates a 90 percent reduction in particulate emissions for new on- and off-road engines.

Nonetheless, an analysis of winter daily operational emissions³⁴ has been prepared utilizing the URBEMIS 2007 computer model. Default heating fuel use and ambient temperature were adjusted to account for the climate at the proposed Project. As discussed previously, the Project would be divided into several phases. Each phase would operate successfully as a complete entity throughout the entire development. Some phases may be under construction simultaneously. Therefore, in order to accurately predict the emissions generated by activities at the Project site, the operational emissions from Site 1 and the construction emissions from Site 2 have been combined. This is then repeated for Site 3 until all sites of the Project have been completed and the entire Project is at build-out. The results of these calculations are presented in Table IV.C-7.

³⁴ Winter operational emissions are expected to be conservative based on heating needs and expected traffic.

**Table IV.C-7
Estimated Winter Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Proposed Site 1 Operational Emissions						
Water and Space Heating ⁽¹⁾	0.60	8.23	6.91	0.00	0.01	0.01
Landscape Maintenance	-	-	-	-	-	-
Consumer Products	0.00	-	-	-	-	-
Architectural Coatings	0.79	-	-	-	-	-
Motor Vehicles ⁽²⁾	11.37	17.45	131.10	0.17	35.13	6.72
Phase I Total Operational Emissions	12.76	25.68	138.01	0.17	35.14	6.73
<i>Peak Phase II Construction Emissions (Mitigated)</i>	<i>117.22</i>	<i>26.32</i>	<i>33.78</i>	<i>0.07</i>	<i>32.91</i>	<i>7.94</i>
Total Emissions	129.98	52	171.79	0.24	68.05	14.67
Proposed Site 1 & 2 Operational Emissions						
Water and Space Heating ⁽¹⁾	1.08	14.90	12.52	0.00	0.03	0.03
Landscape Maintenance	-	-	-	-	-	-
Consumer Products	0.00	-	-	-	-	-
Architectural Coatings	1.32	-	-	-	-	-
Motor Vehicles ⁽²⁾	16.92	25.98	195.16	0.26	52.31	10.02
Phase II Total Operational Emissions	19.32	40.88	207.68	0.26	52.34	10.05
<i>Peak Phase III Construction Emissions (Mitigated)</i>	<i>62.26</i>	<i>20.53</i>	<i>24.72</i>	<i>0.01</i>	<i>1.37</i>	<i>1.23</i>
<i>Phase I Operational Emissions</i>	<i>12.76</i>	<i>25.68</i>	<i>138.01</i>	<i>0.17</i>	<i>35.14</i>	<i>6.73</i>
Total Emissions	94.34	87.09	370.41	0.44	88.85	18.01

**Table IV.C-7
Estimated Winter Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Proposed Site 1, 2, & 3 Operational Emissions						
Water and Space Heating ¹	0.54	7.40	6.22	0.00	0.01	0.01
Landscape Maintenance	-	-	-	-	-	-
Consumer Products	0.00	-	-	-	-	-
Architectural Coatings	0.7	-	-	-	-	-
Motor Vehicles ⁽²⁾	7.68	11.83	88.82	0.12	23.83	4.56
Phase III Total Operational Emissions	8.92	19.23	95.04	0.12	23.84	4.57
<i>Phase I Operational Emissions</i>	<i>12.76</i>	<i>25.68</i>	<i>138.01</i>	<i>0.17</i>	<i>35.14</i>	<i>6.73</i>
<i>Phase II Operational Emissions</i>	<i>19.32</i>	<i>40.88</i>	<i>207.68</i>	<i>0.26</i>	<i>52.34</i>	<i>10.05</i>
Total (Site-Wide) Operational Emissions at Build-Out	41	85.79	440.73	0.55	111.32	21.35
<p><i>Notes:</i></p> <p>(1) Based on vendor observations that winter propane use increases by a factor of five, the default heating emission was increased by an equivalent factor.</p> <p>(2) The default winter temperature in URBEMIS 2007 of 40 degrees Fahrenheit was reduced to the lowest temperature setting (30 degrees Fahrenheit) to account for lower temperatures in the site vicinity.</p> <p>Subtotals may not appear to add correctly due to rounding in the URBEMIS 2007 model. Phase I includes Site 1, Phase II includes Site 2, and Phase III includes Site 3.</p> <p>Source: Christopher A. Joseph & Associates, 2008. Calculation sheets are provided in Appendix K of this Draft EIR.</p>						

As CO, NO_x, ROC, SO_x, and PM_{2.5} are classified as in attainment, the emissions of these pollutants would constitute *less-than-significant* impacts. The impacts of PM₁₀ emissions as a result of Project operations were evaluated based on the Project's compliance with the Town of Mammoth Lakes' AQMP. This AQMP requires that vehicle miles traveled ("VMT") per day in the Town of Mammoth Lakes not exceed 106,600 and that all new residential developments be limited to one solid fuel burning appliance per unit. These requirements are based on the assumption that 23.8 grams of PM₁₀ are emitted per VMT and that each EPA II solid-fuel burning appliance emits an average of 171 grams of PM₁₀ per day. The VMT for the Town of Mammoth Lakes is 108,215. Based on Table J of the Traffic Impact Analysis for the Project, the Project is expected to generate 6,450 VMT per day upon build-out (see Appendix I of this Draft EIR), resulting in a total of 114,665 VMT. However, due to Policy R.10.H from the 2007 General Plan, no solid fuel burning appliances shall be permitted to be installed within any residential units within multi-unit developments. Therefore only one solid fuel burning appliance would be allowed in each of the Hotels (three total) and the Project's residential units would not contribute to PM₁₀ emissions from solid fuel burning appliances. This information was used to calculate total daily PM₁₀ emissions for the Project at the time of the Project build-out. As shown in Table IV.C-8, the total PM₁₀ emissions anticipated as a result of the Project at its completion is 27,141 grams per day. As a result, particulate emissions

generated by wood combustion from the Project would not substantially contribute to Federal and State PM₁₀ violations.

**Table IV.C-8
PM₁₀ Emissions for the Town of Mammoth Lakes as Outlined in the AQMP**

Emission Source	Quantity	Emission Rate grams/day	PM ₁₀ Emissions grams/day
Vehicle Miles Traveled	6,450	23.8	153,510
Phase II solid-fuel burning appliances ⁽¹⁾	-739	171	126,369
Total PM₁₀ Emissions			27,141
<i>Notes:</i>			
<i>(1) A total of 742 hotel rooms are planned for the Project, none of which would contain solid fuel burning appliances. However, one solid fuel burning appliance per hotel (three total) may be allowed.</i>			
<i>Source: Christopher A. Joseph and Associates, June 2008.</i>			

As stated earlier, since PM₁₀ is classified as non-attainment, any PM₁₀ emissions will contribute substantially to an existing air quality violation. Therefore, unless PM₁₀ emissions are reduced by implementation of feasible control measures, impacts caused by these emissions would be considered significant. As a result, in the absence of the mitigation measures, operation activities at the Project site would result in potentially *significant* air quality impacts.

Mitigation Measures AQ-2 Operational Emissions

The Project Applicant shall require the following implementation measures to reduce PM₁₀ operational emissions resulting from the Project to a less than significant level:

- a. The Project shall include a transportation demand management program to reduce overall vehicle miles traveled (“VMTs”), in order to demonstrate compliance with the federal PM₁₀ standard of 150 µg/m³. The program shall include, but not be limited to, circulation system improvements, shuttles to and from parking areas, and the location of facilities to encourage pedestrian circulation;
- b. The Project shall be linked to existing developed areas through existing road networks, public transit systems, open space systems, and bicycle and pedestrian systems;
- c. The Project shall implement trip reduction measures particularly during PM peak traffic hours to disperse trips between parking areas and mountain portals to and from the ski area;
- d. Residential condominium units shall enter into a transit fee agreement with the Town consistent with the Town’s established Transit Fee Agreement Program; and
- e. A maximum of one solid fuel burning appliance may be installed or only one solid fuel burning appliance may be allowed in each hotel. No other solid fuel burning appliances shall be installed on the Project site.

In addition, the Project Applicant will consider the use of geothermal heating for both heating and snow removal to reduce PM₁₀ emissions resulting from crushed cinder and dirt.

Impact AQ-3 Local CO Concentrations

Traffic-congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). By generating additional traffic, the Project could potentially cause exceedances of the 1-hour or 8-hour federal or State CO standards. These conditions would only occur during worst-case atmospheric conditions when temperatures are very low and there is little to no wind speed. Although the Mammoth Lakes Gateway Home Center monitoring station has not recorded any exceedances of the State or federal CO standards, elevated CO concentrations due to heavy traffic volumes and congestion at specific intersections or roadway segments are generally localized and can lead to high levels of CO, or “hot spots.” For this reason, CO modeling was performed in the Project area for intersections or roadway segments currently operating at LOS D, E, or F that would be affected by Project traffic, or for intersections that would decline to LOS D, E, or F as a result of the Project (see Appendix I of this Draft EIR). Therefore, CO modeling was performed for the following roadway intersections based on the Saturday peak traffic hour:

- Minaret Road/Forest Trail;
- Mountain Blvd/Main Street;
- USPO Driveway/Main Street; and
- Center Street/Main Street.

For this analysis, CO concentrations were calculated based on a simplified CALINE4 screening procedure to determine if the Project would cause any exceedances of the State and federal CO standards. The national 1-hour ambient air quality standard is 35.0 ppm and the State 1-hour ambient air quality standard is 20.0 ppm. The 8-hour national and state ambient air quality standard is 9.0 ppm. This methodology assumes worst-case conditions (i.e., wind direction is parallel to the primary roadway, 90 degrees to the secondary road; wind speed of less than one meter per second; and a high level of atmospheric stability or lack of change) and provides a screening of maximum, worst-case CO concentrations. Maximum CO concentrations were calculated for peak-hour traffic volumes at the intersections noted above under existing conditions, existing plus Project conditions, and cumulative conditions. Results are presented in Table IV.C-9 and Table IV.C-10.

**Table IV.C-9
Summary of Localized CO Analysis (1-hour) for the Project**

Intersection	1-Hour CO Concentrations (ppm)		
	Existing 2008	Existing plus Approved Projects	Cumulative w/Project (2009)
1-Hour Ambient Air Quality Standard	20.0	20.0	20.0
Minaret Road/Forest Trail	5.1	5.2	5.2
Mountain Blvd/Main Street	5.6	5.7	5.7
USPO Driveway/Main Street	5.4	5.4	5.4
Center Street/Main Street	5.3	5.4	5.3
<i>Note: Reported concentrations are for the roadway edge and represent a conservative estimate of potential CO concentrations.</i>			
<i>Source: Christopher A Joseph & Associates, 2008.</i>			

The year 2009 was used as the date for CO emission analysis under cumulative conditions, which includes all future growth assumed in Section IV.M (Traffic and Circulation) of this Draft EIR. In some cases, future or cumulative CO emissions are lower than existing CO levels because vehicles are projected to improve in efficiency in the future and reduce CO emissions. Traffic conditions may also improve in the future at some intersections because of traffic improvement measures, thus reducing concentrated CO emissions. Based on the CALINE4 computer-modeling results (Table IV.C-9 and Table IV.C-10), local CO concentrations would not exceed State or national ambient air quality standards. Therefore, emissions of CO associated with the Project would result in a *less-than-significant* CO air quality impact and no mitigation measures are required.

**Table IV.C-10
Summary of Localized CO Analysis (8-hour) for the Project**

Intersection	8-Hour CO Concentrations (ppm)		
	Existing 2004	Existing plus Approved Projects	Cumulative w/Project (2009)
8-Hour Ambient Air Quality Standard	9.0	9.0	9.0
Minaret Road/Forest Trail	2.6	2.6	2.6
Mountain Blvd/Main Street	2.9	3.0	2.9
USPO Driveway/Main Street	2.7	2.8	2.8
Center Street/Main Street	2.7	2.7	2.7
<i>Notes: Reported concentrations are for the roadway edge and represent a conservative estimate of potential CO concentrations.</i>			
<i>Source: Christopher A Joseph & Associates, 2008.</i>			

The presence of vehicles within the underground parking structures at the Project is an additional potential source of CO emissions. Underground parking would potentially result in an increase of vehicles operating in a cold start mode. During a cold start, the car's catalytic converter does not effectively control emissions and in effect, the emissions from the tailpipe are the same as the uncontrolled emissions from the engine during a cold start thereby increasing CO emissions. In addition,

turbulence created by vehicle motion and at the entry and exit areas would cause CO emissions generated by vehicles in the parking garage to irregularly emit from the openings in the underground structure.

Parking garages are categorized as indoor environments and are not widely regulated the way the ambient environment is regulated. Parking garages are not considered sensitive receptors because individuals utilizing such structures are exposed to pollutant levels for short periods. Therefore a CO hotspot analysis was not conducted for the underground parking structures.

Impact AQ-4 Greenhouse Gas Emissions

Parts of the Earth's atmosphere act as an insulating blanket of just the right thickness, trapping sufficient solar energy to keep the global average temperature in a suitable range. The blanket is a collection of atmospheric gases called greenhouse gases (GHG) based on the idea that the gases also trap heat like the glass walls of a greenhouse. These gases, water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), as discussed and defined above, all act as effective global insulators, reflecting visible light and infrared radiation back to Earth. Human activity such as producing electricity and driving motor vehicles has elevated the concentration of these gases in the atmosphere. Many scientists believe that this, in turn, is causing the Earth's temperature to rise. A warmer Earth may lead to changes in rainfall patterns, much smaller polar ice caps, a rise in sea level, and a wide range of impacts on plants, wildlife, and humans.

An individual project cannot generate enough greenhouse gas emissions to influence global climate change. However, an individual project may contribute an incremental amount of GHG emissions. For most projects, the main contribution of GHG emissions is from motor vehicles, but how much of those emissions are "new" is uncertain. New projects do not create new drivers, and therefore do not create a new mobile source of emissions. Rather, new projects only redistribute the existing traffic patterns. Larger projects will certainly affect a larger geographic area, but again, would not cause the creation of new drivers. Some mixed-use and transportation-oriented projects can actually reduce the number of vehicle miles traveled that a person drives.

Greenhouse Gas (GHG) Inventory

The emissions are estimated in tons per year, which are converted to teragrams of carbon dioxide equivalents (Tg CO₂ Eq.) using the formula: Tg CO₂ Eq. = (tons of gas) x (GWP) x (0.902 metric tons of gas) / (1,000,000). One Tg is equal to one million metric tons. The global warming potential ("GWP") for the gases assessed are located in Table IV.C-1.

Note that emissions models such as EMFAC and URBEMIS evaluate aggregate emissions and do not demonstrate, with respect to a global impact, how much of these emissions are "new" emissions specifically attributable to the project in question. For most projects, the main contribution of greenhouse gas emissions is from motor vehicles, but how much of those emissions are "new" is uncertain. New

projects do not create new drivers. Some mixed use and transportation-oriented projects can actually reduce the number of vehicle miles traveled that a person drives; this reduction is not typically discussed in CEQA documents. Therefore, it is anticipated that the Project will not substantially add to the global inventory of greenhouse gas emissions. This is especially true considering that the Project is adding retail uses next to residential uses. Nevertheless, greenhouse gas emissions are estimated using procedures similar to those for criteria pollutants.

Carbon Dioxide (CO₂): The Project will generate emissions of carbon dioxide primarily in the form of vehicle exhaust and in the consumption of natural gas for heating from on-site combustion. Carbon dioxide emissions from vehicles were calculated with EMFAC 2007 emission factors using burden values for the South Coast Air Quality Management District. Carbon dioxide emissions from natural gas combustion were generated from guidance as presented in the Climate Leaders Greenhouse Inventory Protocol.³⁵ The natural gas usage came from discussions with the California Energy Commission; it is lower than default URBEMIS 2007 natural gas usage because the Project will only use natural gas for heating the buildings and for minimal hot water heating. The carbon dioxide emissions are shown in Table IV.C-11. As shown in Table IV.C-11, at build-out, the Project is estimated to emit 0.0075 Tg CO₂ Eq.

**Table IV.C-11
Carbon Dioxide Emissions**

Emission Source	2017
Vehicles (tons/year)	856.87
Natural Gas Combustion (tons/year)	6,639.68
Total (tons per year)	7,496.55
Total (Tg CO₂ Eq.)	0.0075

Methane: The Project will generate some methane gas from vehicle emissions and natural gas combustion. Methane emissions from natural gas combustion were generated using guidance as presented in the Climate Leaders Greenhouse Inventory Protocol.³⁶ Methane emissions from vehicles were estimated using U.S. EPA emission factors for on-highway vehicles and the same assumptions were used to estimate criteria pollutants in URBEMIS 2007. The emissions are shown in Table IV.C-12. As shown in Table IV.C-12, in 2017, emissions would be 1.72E-5 Tg CO₂ Eq.

³⁵ U.S. Environmental Protection Agency, 2004b.

³⁶ U.S. Environmental Protection Agency, 2004b.

**Table IV.C-12
Methane Emissions**

Emission Source	2017
Vehicles (tons/year)	0.005
Natural Gas Combustion (tons/year)	0.742
Total (tons/year)	0.747
Total (Tg CO₂ Eq.)	1.72E-5

Nitrous Oxide (N₂O): The Project generates small amounts of nitrous oxide from vehicle emissions. Emissions from natural gas combustion were generated using guidance as presented in the Climate Leaders Greenhouse Inventory Protocol.³⁷ Nitrous oxide from vehicles was estimated using U.S. EPA emission factors for on-highway vehicles and the same assumptions that were used to estimate criteria pollutants. The emissions are presented in Table IV.C-13. As shown in Table IV.C-13, in 2017 emissions would be 5.39E-6 Tg CO₂ Eq.

**Table IV.C-13
Nitrous Oxide Emissions**

Emission Source	2017
Vehicles (tons/year)	0.0056
Natural Gas Combustion (tons/year)	0.0126
Total (tons/year)	0.0182
Total (Tg CO₂ Eq.)	5.39E-6

Water Vapor: The Project does not contribute to this greenhouse gas because water vapor concentrations in the upper atmosphere are primarily due to climate feedbacks and not emissions from industrial and commercial activities.

Ozone (O₃): Ozone is a greenhouse gas; however, unlike the other greenhouse gases, ozone in the troposphere is relatively short-lived and, therefore, is not global in nature. According to CARB, it is difficult to make an accurate determination of the contribution of ozone precursors (NO_x and ROG_s) to global warming.³⁸ Therefore, Project emissions of ozone precursors would not significantly contribute to global climate change.

Chlorofluorocarbons (CFCs): As mentioned previously, there is a ban on chlorofluorocarbons; therefore, the Project will not generate emissions of these greenhouse gases and is not considered any further in this analysis.

Hydrofluorocarbons (HFCs): The Project may emit a small amount of hydrofluorocarbon emissions from leakage and service of refrigeration and air conditioning equipment and from disposal at the end of

³⁷ *Ibid.*

³⁸ *California Air Resources Board, 2004b.*

the life of the equipment.³⁹ However, the details regarding the refrigerant used and the capacity are unknown at this time.

Perfluorocarbons (PFCs) and Sulfur Hexafluoride (SF₆): These GHGs are typically used in industrial applications, none of which would be used by the Project. Therefore, it is not anticipated that the Project would emit any of these greenhouse gases.

Inventory Summary: The primary GHG generated by the Project would be carbon dioxide. At build-out, total unmitigated carbon dioxide equivalents would be 0.0031 Tg CO₂ Eq., which is 0.0006 percent of California's 2004 emissions (0.0031 Tg CO₂ Eq. divided by 492 Tg CO₂ Eq. = 0.0000062 * 100 = 0.0006 percent). The Town and the Air District currently do not have greenhouse gas inventories.

Compliance with Strategies

California Governor Arnold Schwarzenegger announced on June 1, 2005 through Executive Order S-3-05 GHG emission reduction targets as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. AB 32, as discussed above, requires that by January 1, 2008, CARB shall determine what the statewide greenhouse gas emissions level was in 1990, and approve a statewide greenhouse gas emissions limit that is equivalent to that level, to be achieved by 2020. However, it should be noted that at the time of publication of this document, the CARB had not yet published the quantified 1990 GHG emissions inventory.

Therefore, the California Environmental Protection Agency prepared a Climate Action Team Report ("CAT Report") that "proposes a path to achieve the Governor's targets that will build on voluntary actions of California business, local government and community actions, and State incentive and regulatory programs."⁴⁰ The CAT Report introduces strategies to reduce California's emissions to the levels proposed in Executive Order S-3-05. Under AB 32, CARB has the primary responsibility for reducing GHG emissions. However, the CAT Report contains strategies that many other California agencies can utilize. These strategies are presented in Table IV.C-14, below. As shown, the Project complies with all feasible and applicable measures to bring California to the emission reduction targets. However, as no thresholds of significance pertaining to GHG emissions have been adopted by the Town or established by the State, no determination on the significance of this impact has been made.

³⁹ U.S. Environmental Protection Agency, 2004c.

⁴⁰ California Environmental Protection Agency, Climate Action Team Report, 2006.

**Table IV.C-14
Project Compliance with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

STRATEGY	PROJECT COMPLIANCE
California Air Resources Board	
Vehicle Climate Change Standards: AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the CARB I September 2004.	Consistent. Following a phase-in period, the majority of the vehicles that access the Project would be expected to be in compliance with any vehicle standards that CARB adopts.
Other Light Duty Vehicle Technology: New standards would be adopted to phase in beginning in the year 2017 model year.	Consistent. Following a phase-in period, the majority of the vehicles that access the Project would be expected to be in compliance with any vehicle standards that CARB adopts.
Diesel Anti-Idling: In July 2004, the CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	Consistent. Mitigation AQ-1 requires that the construction fleet will meet the terms set forth in the CARB Proposed Regulation for in-use Off Road Diesel Vehicles, paragraph (d)(3) Idling. The proposed regulation implementation date is May 1, 2008.
Hydrofluorocarbon Reduction: 1) Ban retail sale of HFC in small cans; 2) Require that only low GWP refrigerants be used in new vehicular systems; 3) Adopt specifications for new commercial refrigeration; 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs; 5) Enforce federal ban on releasing HFCs.	Consistent. This measure applies to consumer products. When CARB adopts regulations for these reduction measures, any products that the regulations cover will comply with the measures.
Alternative Fuels: Biodiesel Blends: CARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	Consistent. When available, vehicles that access the Project would be required to use biodiesel blends.
Alternative Fuels: Ethanol: Increased use of ethanol fuel.	Not Applicable.
Heavy-Duty Vehicle Emission Reduction Measures: Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	Consistent. These are CARB enforced standards; vehicles that access the Project that are required to comply with the standards will comply with the strategy.
Reduced Venting and Leaks on Oil and Gas Systems: Rule considered for adoption by the Air Pollution Control Districts for improved management practices.	Not Applicable.
Hydrogen Highway: The California Hydrogen Highway Network (CA H2 Net) is a State initiative to promote the use of hydrogen as a means of diversifying the sources of transportation energy.	Not Applicable.
Achieve 50% Statewide Recycling Goal: Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane	Not Applicable.

**Table IV.C-14
Project Compliance with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

STRATEGY	PROJECT COMPLIANCE
emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	
Zero Waste – High Recycling: Additional recycling beyond the State’s 50% recycling goal.	Not Applicable.
Landfill Methane Capture: Install direct gas use or electricity projects at landfills to capture and use emitted methane.	Not Applicable.
Department of Forestry	
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	Not Applicable.
Afforestation/Reforestation Projects: Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	Consistent: The Project landscaping would incorporate some native trees and shrubs to revegetate disturbed areas. Planting on the Project site would use some native conifers, deciduous trees, and shrubs.
Department of Water Resources	
Water Use Efficiency. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	Consistent. The Project does not include any major source of water consumption. However, the Project would be required to adhere to the Uniform Building Code (UBC) which requires the installation of low flow water devices in new commercial development. In addition, the Project would include landscaping that is consistent with Town Municipal Code Chapter 15.36 “Water-Efficient Landscape” regulations.
California Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	Consistent. The Project will be required to comply with the updated Title 24 standards for building construction including exterior lighting requirements, as applicable. Some of the changes required in the new standard include requirements for indoor lighting efficiency, cool roof coating requirements, duct insulation, and efficient space conditioning. Although no commitments have been made, this does not preclude the Project from incorporating enhanced energy-efficient building features over and above Title 24 standards.
Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	Consistent. Appliances that are purchased for the Project will be consistent with existing energy efficiency standards.
Cement Manufacturing: Cost-effective reductions to reduce energy consumption and to lower carbon dioxide emissions in the cement industry.	Not Applicable.

**Table IV.C-14
Project Compliance with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

STRATEGY	PROJECT COMPLIANCE
<p>Municipal Utility Strategies: Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.</p>	<p>Not Applicable.</p>
<p>Alternative Fuels: non-Petroleum Fuels: Increasing the use of non-petroleum fuels in California's transportation sector, as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.</p>	<p>Not Applicable.</p>
<p>Business Transportation and Housing</p>	
<p>Measures to Improve Transportation Energy Efficiency: Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.</p>	<p>Consistent: The Project promotes fuel conservation through design features, which promote pedestrian traffic, and programs, which encourage public transportation use.</p>
<p>Smart Land Use and Intelligent Transportation Systems (ITS): Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.</p> <p>ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.</p> <p>Governor Arnold Schwarzenegger is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment.</p> <p>Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.</p>	<p>Consistent: The Project locates retail next to residential land uses, which is considered smart land use. Because the Project is locating retail next to residential, the Project is potentially reducing the number of vehicle miles traveled. In addition, the Project is located on a transit route, which has the potential to reduce trips as well.</p> <p>The Project provides goods to those located near the Project site thereby improving the efficiency of goods movement.</p>

**Table IV.C-14
Project Compliance with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

STRATEGY	PROJECT COMPLIANCE
Department of Food and Agriculture	
Enteric Fermentation: Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	Not Applicable.
State and Consumer Services Agency	
Green Buildings Initiative: Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and -leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	Consistent. As discussed above, the Project is initiating energy efficiency under what is required by Title 24. In addition, 2005 Title 24 amendments are 8.5 percent more efficient than those in 2001.
Public Utilities Commission (PUC)	
Accelerated Renewable Portfolio Standard: The Governor has set a goal of achieving 33 percent renewable in the State's resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	Not Applicable.
Investor-Owned Utility: This strategy includes energy efficiency programs, combined heat and power initiative, and electricity sector carbon policy for investor owned utility.	Not Applicable.
<i>Source: Summarized from Climate Action Team Report, 2006.</i>	

CUMULATIVE IMPACTS

Impact AQ-5 Cumulative Impacts

The Great Basin Unified Air Pollution Control District does not have numerical thresholds to determine whether the Project would result in a cumulatively considerable net increase of PM₁₀ or O₃ precursors. However, as discussed above, O₃ impacts are primarily the result of pollution generated in the San Joaquin Valley. Thus, the cumulative increase of O₃ precursor emissions as a result of construction and operation of the proposed and related projects would not substantially contribute to the exceedances of the State O₃ standard and, thus, would not be cumulatively considerable.

According to the Town's General Plan Update EIR, the increases in PM₁₀ emissions associated with both construction and operation of the proposed and related projects would be considered cumulatively

considerable even without development of the Project.⁴¹ Since the Project's construction impact with regard to PM₁₀ emissions would remain significant and unavoidable, the Project's cumulative construction impact on air quality would also be considered ***significant and unavoidable***.

Based on Table J of the Traffic Impact Analysis, the Project is expected to generate 6,450 VMT per day upon build-out (see Appendix I of this Draft EIR). Cumulative VMT for 2009 without the Project is expected to be 110,073 VMT per day. Therefore, total cumulative estimated VMT upon Project build-out is 116,523. This number exceeds the limit of 106,600 VMT set by the AQMP. Therefore, without mitigation measures, cumulative operational impacts for the Project would be ***significant***.

Although the proposed Project would result in higher VMTs than the Town's limit of 106,600, future VMTs would be reduced with the implementation of Mitigation Measures AQ-2, which would include measures to reduce VMTs. In addition, cumulative projects within the Project study area would see similar reductions since solid-fuel burning appliances would be eliminated. Therefore, a further reduction in PM₁₀ emissions would be anticipated despite the exceedance of the Town's VMT limit.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction Impacts

As stated above, implementation of construction Mitigation Measures AQ-1 would reduce construction-related air quality emissions. However, because the region is in non-attainment for PM₁₀, any generation of PM₁₀ emissions during construction of the Project would result in a ***significant and unavoidable*** impact.

Operational Impacts

Implementation of the Mitigation Measures AQ-2 described above would ensure that operational emissions from the Project would be reduced to a ***less-than-significant*** level.

Cumulative Impacts

Since the Project's construction impact with regard to PM₁₀ emissions would remain significant and unavoidable, the Project's cumulative construction impact on air quality would also be considered ***significant and unavoidable***.

The recommended Project operational mitigation measures would also reduce the cumulative emissions associated with operation of the proposed and related projects to a ***less-than-significant*** level.

⁴¹ Town of Mammoth Lakes, General Plan Update EIR, October 2005, p. 4-41.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

D. BIOLOGICAL RESOURCES

INTRODUCTION

This section of the Draft Environmental Impact Report (“Draft EIR”) provides a description of the biological resources on the Mammoth Crossing Project (“Project”) site, information on regulations that serve to protect sensitive biological resources; an assessment of the potential impacts of the Project on such resources, and recommended measures to mitigate potentially significant impacts on sensitive biological resources. A technical biological report was prepared and reviewed to analyze the potential biological resources impacts associated with the Project. The *Biological Site Assessment Report*, prepared by biologists from Christopher A. Joseph and Associates (“CAJA”) is included in Appendix D of this Draft EIR.

ENVIRONMENTAL SETTING

Regional Setting

The Project site is located in the Town of Mammoth Lakes (“Town”), Mono County, California. The Town is located on the eastern slopes of the Sierra Nevada at an elevation of approximately 7,900 feet above sea level within Section 34, Township 3 South, Range 27 East Mt. Diablo Base (“MDB”) and Meridian (“M”). The Town is located approximately 168 miles south of Reno, Nevada, and approximately 310 miles north of Los Angeles, California. Neighboring communities of the Town include June Lake to the northwest, Benton to the east, and Tom’s Place to the southeast (refer to Figure II-1 and Figure II-2). Regional access is provided by U.S. Highway 395 and California State Route 203. Local roadways which provide access to the Project site include Minaret Road, Main Street, Lake Mary Road and Canyon Boulevard.

Local Setting

As previously discussed in Section II, Environmental Setting, of this Draft EIR, the Project, is comprised of four separate sites totaling approximately 11 acres. The Project is located in the northwest portion of Town. Sites 1 through 3 include existing development and are within the *North Village Specific Plan* (“Specific Plan”) area. Sites 1 through 3 are located at the northwest, southwest and southeast corners of the Main Street-Lake Mary Road/Minaret Road intersection, respectively. Site 4 is undeveloped and is not within the Specific Plan area. Site 4 is located to the south of the Main Street-Lake Mary Road/Minaret Road intersection to the east of Minaret Road (refer to Figure II-2). Site 4 is proposed to be incorporated into the Specific Plan boundary and no new development is proposed on Site 4 as part of this Project.

REGULATORY FRAMEWORK

The following discussion identifies federal, state and local environmental regulations that serve to protect sensitive biological resources relevant to the California Environmental Quality Act (“CEQA”) review process.

Federal

Federal Endangered Species Act

The Federal Endangered Species Act (“FESA”) of 1973, as amended, provides the regulatory framework for the protection of plant and animal species (and their associated critical habitats), which are formally listed, proposed for listing, or candidates for listing as endangered or threatened under the FESA. The FESA has four major components: provisions for listing species, requirements for consultation with the United States Fish and Wildlife Service (“USFWS”) and the National Marine Fisheries Service (“NOAA Fisheries”), prohibitions against “taking” of listed species, and provisions for permits that allow incidental “take.” The FESA also discusses recovery plans and the designation of critical habitat for listed species. Both the USFWS and the NOAA Fisheries share the responsibility for administration of the FESA. During the CEQA review process, each agency is given the opportunity to comment on the potential of the Project to affect listed plants and animals.

Sensitive Species

The United States Forest Service (“USFS”) designates plant and animal species identified by a regional forester that are not listed or proposed for listing under FESA for which population viability is a concern, as evidenced by significant current or predicted downward trend in population numbers or density, or significant current or predicted downward trends in habitat capability that would reduce a species’ existing distribution, as “sensitive.” Although these species generally have no special legal status, they are given special consideration under the CEQA during project review.

Clean Water Act Section 404 and 401

The United States Army Corps of Engineers (“Corps”) and the United States Environmental Protection Agency (U.S. EPA) regulate the discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act (“CWA”) (33 U.S.C. 1344). Waters of the United States are defined in Title 33 CFR Part 328.3(a) and include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. The lateral limits of jurisdiction in those waters may be divided into three categories – territorial seas, tidal waters, and non-tidal waters – and is determined depending on which type of waters is present (Title 33 CFR Part 328.4(a), (b), (c)). Activities in waters of the United States regulated under Section 404 include fill for development, water resource projects (such as dams and levees), infrastructure developments (such as highways and airports) and mining projects. Section 404 of the CWA requires a federal license or permit before dredged or fill

material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).

Section 401 of the Clean Water Act (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification from the state in which the discharge originates or would originate, or, if appropriate, from the interstate water pollution control agency having jurisdiction over the affected waters at the point where the discharge originates or would originate, that the discharge will comply with the applicable effluent limitations and water quality standards. A certification obtained for the construction of any facility must also pertain to the subsequent operation of the facility. The responsibility for the protection of water quality in California rests with the State Water Resources Control Board (“SWRCB”) and its nine Regional Water Quality Control Boards (“RWQCBs”).

Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act (16 U.S.C. Sections 661-667e, March 10, 1994, as amended 1946, 1958, 1978, and 1995) requires that whenever waters or channel of a stream or other body of water are proposed or authorized to be modified by a public or private agency under a federal license or permit, the federal agency must first consult with the USFWS and/or NOAA Fisheries and with the head of the agency exercising administration over the wildlife resources of the state where construction will occur (in this case the California Department of Fish and Game [“CDFG”]), with a view to conservation of birds, fish, mammals and all other classes of wild animals and all types of aquatic and land vegetation upon which wildlife is dependent.

The Migratory Bird Treaty Act and, Bald and Golden Eagle Protection Act

The Federal Migratory Bird Treaty Act (“MBTA”) (16 U.S.C. 703 et seq.), Title 50 Code of Federal Regulations (“CFR”) Part 10, prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the United States Department of the Interior. As used in the MBTA, the term “take” is defined as meaning, “to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires.” With a few exceptions, most birds are considered migratory under the MBTA. Disturbances that causes nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA.

The Bald Eagle Protection Act (“BEPA”) (16 U.S.C. 668) was passed in 1940 to protect bald eagles and was later amended to include golden eagles. Under the BEPA it is unlawful to import, export, take, sell, purchase, or barter any bald eagle or golden eagle, their parts, products, nests, or eggs. Take includes pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing eagles.

State

California Endangered Species Act

The State of California enacted similar laws to the FESA, the California Native Plant Protection Act (“NPPA”) in 1977 and the California Endangered Species Act (“CESA”) in 1984. The CESA expanded upon the original NPPA and enhanced legal protection for plants, but the NPPA remains part of the California Fish and Game Code. To align with the FESA, CESA created the categories of “threatened” and “endangered” species. It converted all “rare” animals into the CESA as threatened species, but did not do so for rare plants. Thus, these laws provide the legal framework for protection of California-listed rare, threatened, and endangered plant and animal species. The CDFG implements NPPA and CESA, and its Wildlife and Habitat Data Analysis Branch maintains the California Natural Diversity Database (“CNDDDB”), a computerized inventory of information on the general location and status of California’s rarest plants, animals, and natural communities. During the CEQA review process, the CDFG is given the opportunity to comment on the potential of the Project to affect listed plants and animals.

Fully Protected Species and Species of Special Concern

The classification of “fully protected” was the CDFG’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibian and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at Section 5515, amphibian and reptiles at Section 5050, birds at Section 3511, and mammals at Section 4700) dealing with “fully protected” species states that these species “...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species,” although take may be authorized for necessary scientific research. This language makes the “fully protected” designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with fully protected species were amended to allow the CDFG to authorize take resulting from recovery activities for state-listed species.

Species of special concern are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFG because are declining at a rate that could result in listing or historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFG, land managers, consulting biologist, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under the CEQA during Project review.

California Fish and Game Code Sections 3503 and 3513

According to Section 3503 of the California Fish and Game Code it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird (except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)). Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the MTBA, prohibiting the take or possession of any migratory non-game bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by the CDFG.

California Native Plant Society

The California Native Plant Society (“CNPS”) publishes and maintains an Inventory of Rare and Endangered Vascular Plants of California in both hard copy and electronic version (www.cnps.org/rareplants/inventory/6thedition.htm). The Inventory assigns plants to the following categories:

- 1A – Presumed extinct in California
- 1B – Rare, threatened, or endangered in California and elsewhere
- 2 – Rare, threatened, or endangered in California, but more common elsewhere
- 3 – Plants for which more information is needed
- 4 – Plants of limited distribution

Additional endangerment codes are assigned to each taxa as follows:

- 1 – Seriously endangered in California (over 80 percent of occurrences threatened/high degree of immediacy of threat).
- 2 – Fairly endangered in California (20-80 percent occurrences threatened).
- 3 – Not very endangered in California (<20 percent of occurrences threatened or no current threats known).

Plants on Lists 1A, 1B, and 2 of the CNPS Inventory consist of plants that may qualify for listing, and are given special consideration under CEQA during Project review. Although plants on List 3 and 4 have little or no protection under CEQA, they are usually included in the Project review for completeness.

Porter-Cologne Water Quality Control Act

Waters of the State are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The Regional Water Quality Control Board (“RWQCB”) protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These waterbodies have high resource value, are vulnerable to filling, and may not be

regulated by other programs, such as Section 404 of the CWA. Waters of the State are regulated by the RWQCB under the State Water Quality Certification Program, which regulates discharges of dredged and fill material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, but does involve activities that may result in a discharge of harmful substances to waters of the State, the RWQCB has the option to regulate such activities under its State authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

California Fish and Game Code Section 1600

Streams, lakes, and riparian vegetation as habitat for fish and other wildlife species, are subject to jurisdiction by the CDFG under Sections 1600-1616 of the California Fish and Game Code. Any activity that will do one or more of the following: 1) substantially obstruct or divert the natural flow of a river, stream, or lake; 2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or 3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake; generally require a 1602 Lake and Streambed Alteration Agreement. The term “stream,” which includes creeks and rivers, is defined in the California Code of Regulations (“CCR”) as follows: “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72). In addition, the term stream can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife.¹ Riparian is defined as, “on, or pertaining to, the banks of a stream;” therefore, riparian vegetation is defined as, “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself.”² Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from the CDFG.

Sensitive Vegetation Communities

Sensitive vegetation communities are natural communities and habitats that are either unique, of relatively limited distribution in the region, or of particularly high wildlife value. These resources have been defined by federal, state, and local conservation plans, policies or regulations. The CDFG ranks sensitive communities as “threatened” or “very threatened” and keeps records of their occurrences in its CNDDDB. Sensitive vegetation communities are also identified by CDFG on its List of California Natural Communities Recognized by the CNDDDB. Impacts to sensitive natural communities and habitats

¹ California Department of Fish and Game. Environmental Services Division (ESD). 1994. *A Field Guide to Lake and Streambed Alteration Agreements, Sections 1600-1607, California Fish and Game Code.*

² *Ibid.*

identified in local or regional plans, policies, regulations or by federal or state agencies must be considered and evaluated under the CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

Local

In addition to federal and state regulations, the *Town of Mammoth Lakes General Plan 2007* (“General Plan”)³ defines certain goals, policies, and implementation measures protecting natural resources. Also, the Town has adopted various codes and ordinances that provide protection to natural resources within the Town’s limits.

Town of Mammoth Lakes General Plan

The Town adopted the current General Plan and certified the Final Program Environmental Impact Report for the General Plan Update in 2007.⁴ The policies protecting natural resources applicable to the Project are listed below from the Resource Management and Conservation Element of the General Plan.

Habitat Resources

- Policy (R.1.A): Be stewards of important wildlife and biological habitats within the Town’s municipal boundary.
- Policy (R.1.B): Development shall be stewards of Special Status plant and animal species and natural communities and habitats.
- Policy (R.1.C): Prior to development, projects shall identify and mitigate potential impacts to site-specific sensitive habitats, including special status plant and animal species.
- Policy (R.1.D): Be stewards of primary wildlife habitats through public and/or private management programs. For example: a. Construction of active and passive recreation and development areas away from the habitat b. Use of fences or other barriers and buffer zones
- Policy (R.1.I): Encourage the management of forest resources in and adjacent to the Town to ensure forest health, minimize insect and pathogen outbreaks, and reduce fuel loading.
- Policy (R.1.J): Live safely with wildlife within our community.

Healthy Ecosystem

- Policy (R.2.A): Trash enclosures, receptacles and food storage areas shall be animal resistant.
- Policy (R.2.B): Be stewards of forested areas, wetlands, streams, significant slopes and rock outcroppings. Allow stands of trees to continue to penetrate the community to retain mountain character of Mammoth Lakes. Minimize tree removal for development to the greatest extent possible.

³ *Town of Mammoth Lakes 2007 General Plan.*

⁴ *Town of Mammoth Lakes 2005 General Plan Update FPEIR.*

Water Resources

- Policy (R.4.B): Support and encourage water conservation and recycling practices within private and public developments.
- Policy (R.4.C): Require drought-tolerant landscaping and water-efficient irrigation practices for all development and Town-maintained landscaped areas, parks and park improvement projects. Park design may include limited turf as appropriate to the intended use.
- Policy (R.4.D): Require development to use native and compatible non-native plants, especially drought-resistant species, to greatest extent possible when fulfilling landscaping requirements.
- Policy (R.4.E): Limit use of turf over root zones of native trees to avoid or minimize adverse impacts of excessive water to root zones of native trees.

Erosion and Sedimentation

- Policy (R.5.A): Wisely manage natural and historic drainage patterns.
- Policy (R.5.B): Require parking lot storm drainage systems to include facilities to separate oils and silt from storm water where practical and when warranted by the size of the project.
- Policy (R.5.C): Prevent erosion, siltation, and flooding by requiring use of Best Management Practices (BMPs) during and after construction.

Town of Mammoth Lakes Municipal Code

The Town has adopted the following codes that provide protection to natural resources within the Town's limits.

- Chapter 6.24 Feeding Wildlife Prohibited – Prohibits feeding or in any manner providing food for one or more non-domesticated mammalian predators or rodents, including but not limited to bears, mountain lions, coyotes, raccoons, mice or squirrels, except in those instances outlined in Chapter 6.24-020 (e.g., person is the owner of non-domesticated animal and possess authorization from the appropriate agency(ies) and where person provides foods for trapped, injured or unweaned non-domesticated animal between the time the agency in charge of animal control is notified and such animal is picked-up).
- Chapter 12.08 Land Clearing, Earthwork, and Drainage Facilities – Regulates work on public and private property in order to control grading, earthwork, clearing, erosion, sedimentation, drainage interference, and to promote the conservation of natural resources, including the natural beauties of the land, streams and watersheds, hills, trees and vegetation; to protect the public health and safety; and to generally preserve the terrain and the flora in their natural state as much as possible.
- Chapter 12.28 Animal Poisoning and Trapping – Prohibits the use or attempt to use poison on any animal or use or set any trap to confine, hold, grasp, clamp, crush any animal located within

the boundaries described in Section 12.28.050 located in the Town, except in those instances outlined in Chapter 12.28-030 (e.g., any officer, employee or agent or person acting with permission of the animal control department of the Town acting in his or her official capacity, any owner or lessee or renter of real property or the agent of such owner or lessee or renter may poison or trap mice, rats, rodents and other vermin of less than five pounds live body weight, etc.).

- Chapter 17.38 Water-Efficient Landscaping Regulations – Promotes the values and benefits of landscapes while recognizing the need to invest water and other resources as efficiently as possible, establishes a structure for designing, installing, and maintaining water efficient landscapes in new projects; and establishes provisions for water management practices and water waste prevention for established landscapes.
- Chapter 17.16.050 Grading and Clearing (B) – Requires the preservation of existing trees and vegetation in all residential zones. Existing trees and vegetation shall be preserved to the maximum extent possible. No live trees over six inches in diameter shall be removed without prior approval of the planning director. The director shall base his approval upon the health of the tree(s), the necessity to remove the tree(s) because of building or driveway construction or snow removal/storage, potential hazard or solar access. Creation of views, lawns or similar amenities shall not be sufficient cause to remove native trees. As mitigation for tree removal, the planning director may require replacement plantings. Required replacement shall not exceed a total trunk diameter equal to that removed and shall be limited to plantings in areas suitable for tree replacement.
- Chapter 17.34 Outdoor Lighting – Provides rules and regulations for outdoor lighting within the Town to promote safe and pleasant nighttime environment for residents and visitors; to protect and improve safe travel for all modes of transportation; to prevent nuisances cause by unnecessary light intensity, direct glare, and light trespass; to protect the ability to view the night sky by restricting unnecessary upward projection of light; to phase out existing non-conforming fixtures that violate this chapter, including those owned by the Town and other public agencies, and to promote lighting practices and systems to conserve energy.

METHODOLOGY

A *Biological Site Assessment* report was prepared by biologists from Christopher A. Joseph and Associates (“CAJA”) for the Project site (December 2007) and is included as Appendix D of this Draft EIR. The general purpose of the biological site assessment was to (1) provide a description of the existing biological conditions of the site, (2) determine the potential for special-status plant and animal species and sensitive habitats to occur on the site, (3) identify potentially significant impacts to biological resources that may occur as a result of the Project, and (4) provide avoidance and minimization measures to reduce potentially significant impacts. Biologists from CAJA reviewed available background information pertaining to the biological resources in the vicinity of the Project site and conducted a site assessment on July 26, 2006 to evaluate the impacts of the Project on biological resources. The methods

used to assess the biological resources in the Project site are described in more detail below. In addition to conducting the field reconnaissance, CAJA also reviewed the following background documents:

- *Snowcreek Master Plan Update Draft Environmental Impact Report*, prepared by Christopher A. Joseph and Associates, August 2007;
- *Sierra Star Master Plan Draft Environmental Impact Report*, prepared by Christopher Joseph A. and Associates, April 2007;
- *Final Environmental Impact Statement for the Proposed Snowcreek Golf Course Expansion Project* prepared by the United States Department of Agriculture, Forest Service, June 1997;
- *Final Environmental Impact Report for Lodestar at Mammoth – Volume I-III*, prepared by EIP Associates, February 1991; and
- *The Town of Mammoth Lakes General Plan* prepared by the Town of Mammoth Lakes, 2007.

Vegetation Communities

Plant communities were classified based on existing descriptions given in *Preliminary Descriptions of the Terrestrial Natural Communities of California*⁵ or *A Manual of California Vegetation*⁶. Due to the extensive level of disturbance on the Project site, however, in some cases it was necessary to identify variants of plant community types or to describe non-vegetated areas that are not described in the literature. Therefore, the following habitat classifications are based on shared observed characteristics for those areas.

Special Status Species

For the purposes of this analysis, special-status species include those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS or NOAA Fisheries under the FESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFG under the CESA; plants occurring on List 1A, List 1B, and List 2 of the CNPS Inventory; plants and animals designated as “species of special concern” or “fully protected” by the CDFG; and plants and animals designated as “sensitive” by the USFS.

The potential occurrence of special-status species in the Project site was evaluated by first developing a list of special-status plants and animals that are known to or have the potential to occur in the vicinity of the Project site based on a search of the CNDDDB and CNPS Electronic Inventory records, including the Old Mammoth (434B) United States Geological Service (“USGS”) 7.5-Minute Quadrangle and the eight

⁵ Holland. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game.

⁶ Sawyer & Keeler-Wolf. 1995. *A Manual of California Vegetation*. California Native Plant Society.

surrounding USGS quadrangles^{7,8} and review of the USFWS List of Listed, Proposed, and Candidate Species Which May Occur in Mono County,⁹ *The Town of Mammoth Lakes General Plan*,¹⁰ and *The Town of Mammoth Lakes 2007 General Plan Update Final Environmental Impact Report (FEIR)*.¹¹ Each species was then evaluated for its potential to occur in the Project site according to the following criteria:

The potential for special-status plant and animal occurrence is classified according to the following criteria, and the results are given in Appendix A:

- Not Expected: There is no suitable habitat present in the Project site (i.e., habitats in the Project site are unsuitable for the species requirements (e.g., foraging, breeding, cover, substrate, elevation, hydrology, plant community, disturbance regime, etc.) or the Project site has been surveyed during the proper time of year with negative results.
- Low Potential: There are no known records of occurrence in the vicinity of the Project site and/or there is marginal or very limited suitable habitat present in the Project site;
- Moderate Potential: There are known records of occurrence in the vicinity of the Project site and/or there is some suitable habitat present in the Project site.
- High Potential: There is one or several known records of occurrence adjacent or in close proximity to the Project site and/or there is considerable and/or ideal suitable habitat present in the Project site.
- Present: The species was observed in the Project site recently.

Appendix A of the *Biological Site Assessment Report* (Appendix D of this Draft EIR), presents the list of special-status plants and animals that are known to or have the potential to occur in the vicinity of the Project site, their habitat requirements, and a rating of potential for their occurrence. No species were identified as “present” or had “high potential” to occur within the Project site; those species identified as having a “moderate” potential to occur in the site are discussed further in this section of the Draft EIR.

⁷ California Department of Fish and Game. December 2007 California Natural Diversity Database (CNDDDB) Rarefind [CD-ROM], Wildlife Habitat Data Analysis Branch, California Department of Fish and Game. Sacramento: California.

⁸ California Native Plant Society. December 2007. *Inventory of Rare and Endangered Plants* (online edition, v7-06d). California Native Plant Society, Sacramento. (<http://cnps.org/inventory>).

⁹ U.S. Fish and Wildlife Service, Sacramento Office. December 2007. *Endangered and Threatened Species List*. (http://www.fws.gov/sacramento/es/spp_list.htm)

¹⁰ *Town of Mammoth Lakes 2007 General Plan*.

¹¹ *Town of Mammoth Lakes 2005 General Plan Update FPEIR*, May 2007.

Sensitive Natural Communities

Sensitive natural communities include those such as riparian habitats, wetlands, and habitats for protected species. These communities are usually identified in local or regional plans, policies, or regulations, or by federal or state agencies (e.g., USFWS, Corps, CDFG, and RWQCB). Vegetation communities and wildlife habitats identified in the Project site were evaluated to determine if they are considered sensitive by local, state, or federal agencies. The specific methods used to determine potential presence of sensitive natural communities are described in more detail below.

Riparian Habitat

A review of aerial photographs and Project site photographs, and an on-site inspection of the drainages, ponds, and other aquatic features were conducted to determine if the banks of these features support hydrophytic or stream-dependent woody plant species (i.e., riparian species).

Waters of the United States and Waters of the State

The Project site was evaluated for wetland and “other water” features regulated under federal (Section 404 and 401 of the Clean Water Act) and state regulations (Porter-Cologne Water Quality Control Act or CDFG Streambed Alteration Program). The wetland and other waters assessment was based on the technical guidelines and methods in the *1987 Corps of Engineers Wetland Delineation Manual*.¹² Under these procedures, an area is identified as a wetland if positive indicators are present for each of the three wetland parameters – (1) vegetation, (2) soil, and (3) hydrology. In addition, the site was inspected for the presence of “other waters”, features that are inundated for sufficient duration and depth to exclude growth of wetland vegetation and are often characterized by an ordinary high water mark (“OHWM”). Other waters, for example, generally include lakes, rivers, and streams.

EXISTING CONDITIONS

The Project Site is mapped in the northern portion of the Old Mammoth USGS 7.5-Minute Topographic Quadrangle. The Project site is relatively level and ranges in elevation between approximately 8,050 to 7,960 feet above mean sea level (msl), sloping gently downward from northwest to southeast. The Project site is surrounded on all sides by residential and commercial development and is not directly connected to any large, contiguous open space areas.

The United States Department of Agriculture (“USDA”) Natural Resource Conservation Service (“NRCS”) has mapped two soil types on the Project site: (1) Vitrandic Xerorthents, 15 to 30 percent slopes, mapped within Site 1 located on the north side of Lake Mary Road/Main Street; and (2) Chesaw

¹² *Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-7, U.S. Army Engineer Waterways Experiment Station, Vicksburg, Miss.*

family, 5 to 15 percent slopes¹³, comprising the remainder of the Project site. The Chesaw series consists of very deep, somewhat excessively drained soils formed in glacial outwash and are typically found on terraces, terrace escarpments and eskers on slopes ranging from 0 to 65 percent. In a typical profile, the surface layer is dark gray, brown, and black gravelly loamy sand and is approximately 12 to 18 inches thick, underlain by a variegated, very gravelly sand parent material. Vitrandic Xerorthents consists of deep, somewhat excessively drained soils formed in glacial moraine and are typically found on terraces, terrace escarpments and eskers on slopes ranging from 0 to 65 percent. In a typical profile, the surface layer is dark gray gravelly loamy sand and is approximately 12 to 18 inches thick, underlain by a variegated, very gravelly sand parent material.¹⁴

Vegetation Communities and Wildlife Habitats

Vegetation communities and wildlife habitats identified in the Project site are described below and illustrated on Figure IV.D-1. Plant species identified during general vegetation and animal surveys are listed on page A-1 within Appendix D of this Draft EIR.

Jeffrey Pine Forest

Jeffrey pine (*Pinus jeffreyi*) forest is the dominant plant community within the undeveloped portions of Site 2 and Site 4. This community is not identified as sensitive in local or regional plans, policies, regulations, or by the CDFG. This plant community generally has well-drained soils and is replaced by subalpine coniferous forest and lodgepole pine forest at its upper elevation limit.¹⁵ All plant species observed in this community within the Project site are common to the region. Jeffrey pine forms an intermittent canopy, growing in association with occasional red fir (*Abies magnifica*) individuals. The forest understory is relatively sparse and homogenous, supporting low growing, scattered shrubs, and open, unvegetated areas covered by pine needle litter. Common understory species include Great Basin sagebrush (*Artemisia tridentata*), rabbit-brush (*Chrysothamnus viscidiflorus*), tobacco brush (*Ceanothus velutinus*), and creeping snowberry (*Symphoricarpos mollis*). Developed features such as roads, parking lots and structures are also present in portions of the Jeffrey pine forest on the Project site. Due to the proximity of nearby roads and buildings, much of the Jeffrey pine forest onsite provided disturbed habitat conditions, evidenced by low species diversity, low habitat complexity/structure, and the presence of weedy, invasive species such as Russian thistle (*Salsola tragus*).

¹³ U.S. Department of Agriculture, Natural Resources Conservation Service. *Web Soil Survey 1.1, National Cooperative Soil Survey*. Accessed on April 19, 2007.
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

¹⁴ Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. *Official Soil Series Descriptions*. <http://soils.usda.gov/technical/classification/osd/index.html>.

¹⁵ Holland, R.F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game.

Great Basin Sagebrush

A stand of Great Basin sagebrush (*Artemisia tridentata*) was mapped along a moderate slope on coarse, gravelly and well drained soils within the northeastern portion of Site 2. Great Basin sagebrush is found within a wide elevation range, mainly from 3,600 to 9,800 feet (1,098 to 2,990 meters) on the eastern slopes of the Sierras, in the northern Mojave and Great Basin deserts, the Modoc Plateau, and within isolated pockets of the inner South Coast Range.¹⁶ Great Basin sagebrush occurs in the Project site in association with rabbitbrush (*Chrysothamnus viscidiflorus*), creeping snowberry, tobacco brush, and Greenleaf manzanita (*Arctostaphylos patula*), and a few scattered red fir saplings. The relatively dense and low-growing shrub canopy in this community includes occasional patches of bare ground with sparsely distributed herbaceous species such as western tansy mustard (*Descurania pinnata*), ranger's buttons (*Sphenosciadum capitatum*), and yellow salsify (*Tragopogon dubius*). This community is not identified as sensitive in local or regional plans, policies, regulations, or by the CDFG.

Barren

Landscapes generally devoid of vegetation are labeled on Figure IV.D-1 as Barren and include unpaved areas of exposed gravel and/or cobbles that appear to have been used as a borrow area and recently graded. Located on the southwest corner of the Lake Mary and Minaret Road intersection, this area is completely unvegetated and partially surrounded by chain link fencing.

Developed

Significant portions of each of the Project's three sites consist of existing commercial and a few residential buildings with landscaping and parking areas. All of Site 1 and approximately 40 percent of Site 2 and 50 percent of Site 3 is developed and/or paved and regularly disturbed by vehicles and/or equipment. Vegetation within developed areas consists of scattered Jeffrey pines and non-native/ornamental vegetation planted for landscaping purposes.

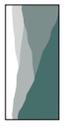
¹⁶ Holland, R.F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game.



Legend

- Project Site
- Plant Communities**
- Barren
- Developed
- Jeffrey Pine Forest
- Great Basin Sagebrush

Source: Town of Mammoth Lakes, CaSIL and Christopher A. Joseph & Associates, January 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

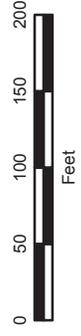


Figure IV.D-1
Plant Communities

Wildlife

The vegetation communities present in the Project site and within surrounding areas likely provide habitat for a wide variety of common wildlife species. Given the proximity of development to natural vegetation communities found in the Project site, many of the wildlife species found on the site tend to be less sensitive to human-related disturbances. Although Great Basin sagebrush generally provides important foraging habitat for larger mammals, the fragmented and disturbed condition of the stand found in the Project site would preclude it from providing significant winter-range habitat for migratory herds such as mule deer (*Odocoileus hemionus*). Several wildlife species may forage within Jeffrey pine forest and Great Basin sagebrush, but some require special habitat features, such as cliffs, caves, and ponds, that provide breeding, resting, and escape cover. Wildlife species occurring on the Project site are generally those that have adapted to, and are tolerant of, human activities, and are common in urban areas, including common species such as American Crow (*Corvus brachyrhynchos*) and Common Raven (*Corvus corax*).

Wildlife species observed in the Project site during the survey are common to the region and are generally tolerant to human disturbance. Wildlife species observed on-site are listed in Appendix B. Observed mammals include golden-manteled ground squirrel (*Spermophilus lateralis*), Nuttall's cottontail (*Sylvilagus nuttallii*), and Douglas's squirrel (*Tamiasciurus douglasii*). Evidence of black bear (*Ursus americanus*) (e.g., scat) was also observed. Twelve bird species were observed during the site reconnaissance, including Northern Flicker (*Colaptes auratus*), Western Wood Peewee (*Contopus sordidulus*), American Crow, Common Raven, Steller's Jay (*Cyanocitta stelleri*), Dark-eyed Junco (*Junco hyemalis*), Clark's Nutcracker (*Nucifraga columbiana*), Mountain Chickadee (*Poecile gambeli*), Red-breasted Nuthatch (*Sitta canadensis*), Pygmy Nuthatch (*Sitta pygmaea*), Red-breasted Sapsucker (*Sphyrapicus ruber*), and American Robin (*Turdus migratoriu*).

Amphibian presence was not observed and is not anticipated on-site, due to the lack of suitable aquatic features such as wetlands, streams, or ponds. Reptiles are potentially present on the Project site given the arid conditions, friable soils and patches of open vegetation that may provide opportunities for foraging and basking. However, due to the intensity and frequency of site disturbance, limited amount of refuge sites (such as dense vegetation cover or rock outcrops), the site's adjacency to roads and development and its isolation from other natural habitats, it is unlikely that the site supports a viable reptile population.

Some migratory songbirds may nest in trees and shrubs within the Project site. Other migratory birds may use the site to rest and forage. Due to the heavily and frequently disturbed nature of the site, and the level of human activity within and surrounding the site in adjacent residential and commercial developments, uncommon or sensitive bird species are generally not expected or are considered to have a moderate to low potential to nest on-site, as discussed in the following section.

Special Status Species

As discussed above in the Background and Methods section, the special-status plant and animal species evaluated for their potential to occur in the Project site are listed on Page A-1 within Appendix D of this Draft EIR. Those species rated as having a “moderate” potential for occurrence are discussed further below. No special-status species were “present” or had a “high” potential for occurrence. The plants and animals rated as “not expected” to occur or that have a “low” potential for occurrence are not discussed in this section because: (1) these species are not likely to occur in the Project site due to the fact that the general habitat and/or micro-habitat requirements for the species are not present, (2) the species distribution does not include the Project site, and/or (3) the species was not detected during field surveys.

Plants

Based upon a review of the resources and databases available, as outlined in the Background and Methods discussion above, 33 special-status plant species have been documented in the general vicinity of the Project site. The *Biological Site Assessment Report* (Appendix D of this Draft EIR) summarizes the potential for occurrence of these plant species based on habitat criteria, observed site conditions, and background research. WRA and CAJA conducted a focused rare plant survey on July 26, 2006, which coincided with peak blooming periods of all special-status plant species with potential to occur within the Project site. Plant species were identified to the level necessary to determine if they were rare or not. Based on this evaluation, all of these species were considered “not expected” to occur on-site due to varying reasons, including lack of observation during their reported blooming season, absence of suitable habitat on-site, and/or a high level of human-related disturbance. All of the 32 plant species observed within the Project site are common to the region and are not considered to be special-status. A complete list of observed species is provided in Appendix B of the *Biological Site Assessment Report* (Appendix D of this Draft EIR).

Wildlife

Based on the data compilation, background research and site survey, 61 special-status wildlife species were recorded to occur, or have the potential to occur, in the region. The *Biological Site Assessment Report* (Appendix D of this Draft EIR) summarizes the potential for occurrence of these species within the Project site. The requirements of these species recorded in the region were evaluated as compared to the conditions observed during the site survey to determine their potential for occurrence. Many of the species were considered unlikely to occur because the Project site is surrounded by development and an existing golf course. Undeveloped portions of Jeffrey pine-fir forest and Great Basin sagebrush scrub have low structural diversity and high levels of disturbance, likely resulting in relatively low animal species and numbers occupying these habitats.

Of the 61 special-status species evaluated, eight species have a “moderate potential” to occur within the Project site. The remaining 53 species are considered unlikely to occur because the Project site is surrounded by development and provides limited areas of suitable habitat. Of these 53 species, 14

wildlife species have “low potential” for occurrence and are not likely to be affected by the proposed Project. Although these species may occasionally disperse through or forage on-site, the fragmented areas of natural habitats are altered by regular disturbance from surrounding developments. On-site habitats provide limited opportunities for burrow or den occupation by sensitive mammal species or nesting by several special-status bird species. The remaining 39 species are “not expected” to occur on the site due to varying reasons, including a lack of suitable habitat on-site, the high disturbance and human activity level on the site, and/or the lack of known or recent documented occurrences in the area.

The eight species that have a moderate potential for occurrence and therefore may be impacted by the proposed development are discussed below:

Mammals

Long-eared myotis (*Myotis evotis*). Western Bat Working Group (“WBWG”) Medium Priority. Long-eared myotis is a bat species that primarily inhabits coniferous forest and woodland, including juniper, ponderosa pine, and spruce-fir. It typically forages over rivers, streams, and ponds within the forest-woodland environment. Water features on the Sierra Star Golf Course, situated less than ¼ mile from the site, may provide suitable foraging habitat for this species. During summer, the long-eared myotis roosts in a wide variety of structures, including cavities in snags, under loose bark, stumps, buildings, rock crevices, caves and abandoned mines. During winter, it typically hibernates primarily in caves and abandoned mines. Maternity colonies, hibernacula, and roosts are vulnerable to disturbance and destruction.¹⁷ This species may roost in mature Jeffrey pine trees and unoccupied buildings on the Project site. According to CNDDDB records, there is a documented occurrence of long-eared myotis approximately seven miles southwest of the Project site in Devils Postpile National Monument.¹⁸

Fringed myotis (*Myotis thysanodes*). WBWG High Priority. This bat species has been found in hot desert scrubland, grassland, xeric woodland, sage-grass steppe, mesic old-growth forest, and multi-aged subalpine coniferous and mixed-deciduous forest. Xeric woodlands (oak and pinyon-juniper) appear to be the most commonly used habitat. Where available, caves, buildings, underground mines, rock crevices in cliff faces and bridges are used most often for maternity and night roosts, while hibernation has only been documented in buildings and underground mines. Tree-roosting has also been documented in Oregon, New Mexico, and California. This species has potential to roost in large Jeffrey pine trees and unoccupied buildings on the Project site.

Long-legged myotis (*Myotis volans*). WBWG High Priority. Habitat for the long-legged myotis primarily consists of coniferous forests, but the species also occurs seasonally in riparian and desert habitats. They establish roosts in trees, rock crevices, fissures in stream banks, and buildings. This species may forage and roost in Project site. Mature Jeffrey pine trees and unoccupied buildings may

¹⁷ New Mexico Department of Game and Fish. 1997. *Fish and Wildlife Information Exchange--VA Tech*. Online. Available: <http://www.fw.vt.edu/fishex/nm.htm>. Accessed 14 April 1998, last update 29 October 1997.

¹⁸ California Department of Fish and Game. December 2007. *Natural Diversity Database*. Commercial version.

provide suitable roosting habitat. According to CNDDDB records, there is a documented occurrence of long-legged myotis approximately seven miles southwest of the Project site in Devils Postpile National Monument.¹⁹

Yuma myotis (*Myotis yumanensis*), Western Bat Working Group (WBWG) Low-Medium Priority. The Yuma myotis is common in a wide variety of habitats including riparian, desert scrub, moist woodlands and forests, ranging from sea level to 3,300 meters (11,000 feet), but is uncommon to rare above 2,560 meters (8,000 feet).²⁰ This species roosts in buildings, mines, caves, or crevices and has also been observed roosting in abandoned swallow nests and under bridges. Separate night roosts may be used in more open areas. This bat species is known for its ability to survive in urbanized environments. It is also found in heavily forested settings. Day roosts are found in buildings, trees, mines, caves, bridges and rock crevices. Night roosts are associated with man-made structures. According to CNDDDB records, there is a documented occurrence of Yuma myotis approximately seven miles southwest of the Project site in Devils Postpile National Monument.²¹ The Yuma myotis is more closely associated with water than most other North American bats²² and may forage over golf course water features located southeast of the Project site. Potentially suitable roosting habitat is available on site in large trees and unoccupied buildings.

Birds

Cooper's Hawk (*Accipiter cooperi*), CDFG Species of Special Concern. This hawk is associated with woodland and forest habitats throughout California. Although nest sites are usually found in isolated areas, this species frequently occurs in urban habitats in winter and during migration. Mature trees in the Project site may provide nesting habitat for this species.

Olive-sided Flycatcher-nesting (*Contopus cooperi*, USFWS Bird of Conservation Concern (BCC). This species historically used recently burned areas, but now that most fires are suppressed, it often takes advantage of areas that have been logged, as well as other clearings and edges, which are superficially similar to post-fire stands. Suitable breeding and foraging habitat is available within Jeffrey pine forest habitat within the Project site.

Lewis' Woodpecker (*Melanerpes lewis*), USFWS BCC. Lewis' Woodpeckers prefer logged or burned out areas. They prefer old growth woodlands rather than dense forest. In winter they choose oak woodland

¹⁹ California Department of Fish and Game. December 2007. *Natural Diversity Database. Commercial version.*

²⁰ California Department of Fish and Game. California Interagency Wildlife Task Group. 2007. *California Wildlife Habitat Relationships version 8.1 personal computer program. Sacramento, California.*

²¹ California Department of Fish and Game. December 2007. *Natural Diversity Database. Commercial version.*

²² NatureServe. December 2007. *NatureServe Explorer: An online encyclopedia of life [web application]. Version 6.1. NatureServe, Arlington, Virginia. Available at <http://www.natureserve.org/explorer>. (Accessed: January 2008)*

or commercial orchards such as almond and walnut and pecan trees.²³ Suitable breeding and foraging habitat is available in the Project site.

White-headed Woodpecker (*Picoides albolarvatus*), USFWS BCC. White-headed Woodpecker requires mature ponderosa pine stands. They have also been found in ornamental gardens, mixed ponderosa pine/Douglas fir forest, Douglas fir forest, Engelmann spruce/lodgepole pine forest and black cottonwoods. Suitable breeding and foraging habitat is available in the Project site.

Other Migratory Birds and Raptors

Bird nesting activities are protected under the State Fish and Game Code, and if any are migratory birds they are also protected under the Federal Migratory Bird Treaty Act; therefore, these bird species are also considered to be special-status species. Under this legislation, destroying active nests, eggs, and young is illegal. Migratory birds and raptors forage and nest in a wide variety of habitats throughout Mono County. Typically, migratory birds and raptors nest within trees and other vegetation in areas that are removed from human disturbance; however, some species such as great horned owl (*Bubo virginianus*) and red-tailed hawk are known to nest in and adjacent to developed areas where there is nearby undeveloped lands supporting an abundance of prey. Although the habitats on-site are highly disturbed and support limited natural vegetation and/or habitat complexity generally desired by most birds for nesting, some birds may still nest on-site.

Wildlife Movement

The movement and migration of wildlife in urban and suburban areas has been substantially altered due to habitat fragmentation over the past century. This fragmentation is most commonly caused by development, which can result in large patches of land becoming inaccessible and forming a virtual barrier between undeveloped areas, or resulting in additional roads which, although narrow, may result in barriers to smaller or less mobile wildlife species. Habitat fragmentation results in isolated “islands” of habitat, which prevents the exchange of genetic material within species populations in different geographic areas necessary to maintain the genetic variability to withstand major environmental disturbances such as fire or climate change.²⁴ A lack of genetic variability within a population may eventually lead to extinction, as it will not have the ability to evolve or adapt to changing conditions over time.

The exchange of genetic material within wildlife populations is accomplished through the dispersal of individuals. Animals disperse for different reasons, some following pre-programmed migratory routes while others disperse due to disturbances (development, fire) or scarcity of resources (food, water). In these situations, larger terrestrial species such as deer can often overcome considerable obstacles from

²³ Winkler, H., D. Christie, D. Nurney. 1995. *Woodpeckers A Guide To The Woodpeckers Of The World*. New York: Houghton Mifflin Company.

²⁴ California Wilderness Coalition, et. al. *Missing Linkages: Restoring Connectivity to the California Landscape*. (<http://www.calwild.org/resources/pubs/linkages/index.htm>)

urban development, including freeways, large building complexes and tall fences. Smaller, less mobile animals, however, are often confined to remaining fragments of isolated habitat. Generally areas less than several hundred square miles are considered too small to contain major wildlife movement or migratory corridors, but rather these areas may be located within such a route or be considered a secondary pathway. Corridors connect larger areas of land and allow for free genetic exchange within a species population, while pathways may allow for wildlife movement but may not serve to promote the larger exchange and viability of genetic variability between areas. Linkages are considered a type of corridor, as they provide some type of physical connection between habitat areas, such as drainage or freeway undercrossing; however, depending on the quality or size of the linkage, certain wildlife species may be unable or unlikely to use the linkage. For highly mobile or flying animals, linkages may exist as discontinuous patches of habitat which are close enough to act as “stepping stones” that facilitate movement between larger habitat areas.

Due to considerable residential and commercial development within and surrounding and the Project site, including a network of busy roadways bisecting the site, the Project site does not provide viable linkages or migration corridors between habitat areas. To the extent that small and fragmented patches of remnant habitats occur within the Project Site, they have become virtual islands of habitat and provide limited opportunity for wildlife movement and exchange of genetic material. Wildlife movement between the site and Inyo National Forest lands is likely to be very restricted (except for bird species) due to the lack of physical linkages and existing barriers (roads). Migration through the site may occasionally occur for only the most mobile terrestrial species such as mule deer or black bear as “accidental” incidents, possibly facilitated by disturbances causing an individual to panic and flee the site, and likely only at night when the considerable barriers of traffic and human disturbance activities in the surrounding urban environment are at their lowest levels. Such movement is sporadic and very unlikely to result in a significant exchange in genetic material or linkage of the site to core habitat areas beyond the Town limits. Therefore, the Project site does not act as a true wildlife corridor, movement pathway, or linkage of note between larger habitat areas for terrestrial wildlife.

Sensitive Natural Communities

Riparian Habitat

Riparian habitat was not observed during an initial inspection of aerial photography and topographic maps of the Project site. Subsequently, no drainages or aquatic features supporting riparian vegetation were observed during the biological site assessment.

Plant Communities

Although two sensitive plant communities have been recorded in the vicinity of the Project site, Mono Pumice Flat and Water Birch Riparian Scrub, no sensitive plant communities or habitats exist on the Project site. These sensitive plant communities require highly alkaline soils or direct hydrology via groundwater discharge, rivers or streams, or surface ponds; in addition, both require relatively

undisturbed site conditions. Only disturbed and partially developed Jeffrey pine forest and Great Basin sagebrush scrub habitats were observed on the Project site, which are not identified as sensitive in local or regional plans, policies, regulations, or by the CDFG. Therefore, the Project site does not support sensitive natural communities.

Jurisdictional Resources

No waters of the United States or waters of the State were observed on the Project site, including wetlands, streams, ponds, or lakes. Furthermore, such jurisdictional features are not expected to have occurred on the site historically. The Project site is situated on a gently sloped hillside supporting upland (non-wetland) vegetation consisting of coniferous trees and montane chaparral plants, well drained and non-wetland soils, and lacks drainage-like or depressional topography.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the *CEQA Guidelines*, the project could have a significant environmental impact on biological resources if it would:

- (a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or United States Fish and Wildlife Service;
- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or United States Fish and Wildlife Service;
- (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- (d) Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of a native wildlife nursery site;
- (e) Conflict with an local polices or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- (f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Thresholds (c) and (f) listed above were determined to result in no impact. Therefore, only Thresholds (a), (b), (d) and (e) listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off-site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve construction of multiple buildings ranging in height from one to approximately seven stories.

Significant portions of the Project site consist of existing commercial and residential buildings with landscaping and parking areas. All of Site 1 and approximately 40 percent of Site 2 and 50 percent of Site 3 are developed and/or paved and regularly disturbed by vehicles and surrounding development. All existing development on the sites, with the possible exception of the Whiskey Creek Restaurant on Site 1, would be demolished for construction of parking lots, new buildings, and landscaped areas. On Sites 2 and 3, the proposed Project will result in an expansion of the existing development footprint into undeveloped areas that currently support Jeffrey pine forest and Great Basin sagebrush scrub, resulting in potential impacts to biological resources that are discussed in further detail below.

The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

The impacts of the Project on biological resources are grouped below into major categories of impacts. The actual impact and its anticipated location on the Project site is described in detail within each major category below.

Impact BIO-1 Special Status Species

Based on results from the *Biological Site Assessment Report* conducted by CAJA (Appendix D of this Draft EIR), eight special-status wildlife species, including four bat and four bird species, have a moderate potential to occur within the Project site; these species and/or their potential habitat may be impacted by the Project. No special-status plants are present on-site. Recommended applicable sensitive species surveys and mitigation measures are outlined below.

Plants

Although 33 special-status plant species were recorded to occur, or have the potential to occur, in the region, none are expected to occur on-site based on a lack of suitable habitat, disturbed conditions, and/or lack of observation during a survey that coincided with peak blooming periods of all potentially present species. Therefore, the proposed Project would have **no impact** on special-status plants and no mitigation measures are required.

Wildlife

Based on the results of the biological site assessment, four bat and four bird species were considered to have a moderate potential to occur within the Project site and, therefore, may be adversely impacted by the proposed Project.

Bats

Potentially suitable roost habitat is present for four special-status bat species: long-eared myotis, long-legged myotis, fringed myotis, and Yuma myotis, including any mature (greater than 25-inch diameter at breast height) tree stand and any large snags or felled trees. Removal of roost habitat during the bat hibernation or maternity season has potential to result in harm, death, displacement and/or disruption of bats and/or nursery colony roosts; this impact may be considered **significant** under CEQA. To avoid impacting breeding or hibernating bats, implementation of Mitigation Measure BIO-1a below, restricting tree and building removal activities during the maternity and roost seasons or conducting preconstruction surveys, is recommended to reduce this impact to a less-than-significant level.

Birds

Four sensitive bird species have a moderate potential to nest on-site, including Coopers Hawk, Lewis' Woodpecker, White-headed Woodpecker, and Olive-sided Flycatcher; in addition, non special-status migratory and other bird species have a high potential to nest on the site. Construction activities including vegetation removal, noise and vibration have a potential to result in direct (i.e., death or physical harm) and indirect (i.e., nest abandonment) significant impacts to nesting birds; these impacts would be considered *significant*. However, implementation of Mitigation Measure BIO-1-b below, involving either vegetation removal/initiation of construction activities before the nesting season or pre-construction surveys during the nesting season would reduce this impact to a less-than-significant level.

Mitigation Measure BIO-1a Special Status Species

To avoid impacting breeding or hibernating bats, tree and snag removal shall occur in September and October, after the bat breeding season and before the bat hibernation season. If snag and tree removal is to take place outside of this time frame, a pre-construction bat survey should be conducted. If no roosting bats are found during the survey, no further mitigation would be required. If bats are detected, a 50-foot buffer exclusion zone should be established around each occupied snag or tree until the roosting activities have ceased.

Mitigation Measure BIO-1b Special Status Species

To avoid impacting nesting birds and/or raptors, **one** of the following must be implemented:

- Conduct vegetation removal and other ground disturbance activities associated with construction during September through March, when birds are not nesting;

- OR -

- Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction raptor survey no more than 30 days prior to initiation of grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the project site). If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFG and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 25 feet is required by CDFG for songbird nests, and 200 to 500 feet for raptor nests, depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel restricted from the area. A survey report by the qualified biologist verifying that the young have fledged shall be submitted to the Town prior to initiation of grading in the nest-setback zone.

Impact BIO-2 Sensitive Natural Communities

No riparian vegetation or other sensitive communities exists within or adjacent to the Project site. While the Jeffrey pine-fir forest plant community present on-site is not considered sensitive, it contains many trees that would meet the minimum size (six inches in diameter) to require approval from the Town prior to removal; impacts to these trees are addressed under “Impact BIO-4: Conformance with Town Policies and Ordinances” below. Therefore, the Project would have ***no impact*** on sensitive natural communities and no mitigation measures are required.

Impact BIO-3 Wildlife Movement and Habitat Connectivity

The Project is unlikely to disrupt wildlife movement and will not impede the use of native wildlife nursery sites or migration corridors. Given that the Project site already consists of developed and/or disturbed habitats and is completely surrounded by residential or resort developments and busy Town streets, the site does not currently provide an open space buffer between developments adjacent to migration corridors. It is unlikely that the Project site is important for wildlife movement or nursery use. In addition, no major migratory routes for mule deer or other important migratory animals in the region, occurs within the Urban Growth Boundary (“UGB”) which entirely encompasses the Project site.²⁵ Therefore, the Project would have a ***less-than-significant*** impact on wildlife movement, migration corridors, or nursery sites and no mitigation measures are required.

Impact BIO-4 Conformance with Town Policies and Ordinances

The proposed development would conflict with the intent of some policies of the Town’s Municipal Code regarding tree removal. General Plan policy consistency is discussed in detail in Section IV.I, Land Use and Planning of this Draft EIR. The Jeffrey pine-fir forest plant community present on-site contains several trees that would meet the minimum size (six inches in diameter) to require approval from the Town prior to removal. The Project should be designed to conform with the municipal code such that existing trees and vegetation are preserved to the maximum extent possible. Prior to the issuance of building permits by the Town, the Project Applicant shall submit a Vegetative Hazard Management Plan (“VHMP”) for approval by the Mammoth Lakes Fire Protection District (MLFPD). In compliance with MLFPD requirements, implementation of the VHMP may require tree trimming and/or the removal of additional trees. Although not documented in the Town’s Municipal Code (Chapter 17.16.050), it is the Town’s intent not to protect all live trees but, native trees over six inches in diameter.²⁶ The removal of live trees over six inches in diameter associated with the proposed Project and implementation of the VHMP may result in ***significant*** impacts; however, the implementation of Mitigation Measure BIO-4 below would reduce this impact to a less-than-significant level.

²⁵ Town of Mammoth Lakes 2005 General Plan Update FPEIR, May 2007.

²⁶ Personal Communication. Bill Taylor, Deputy Community Development Director, Town of Mammoth Lakes. July 10, 2007 – phone conference with CAJA.

Mitigation Measure BIO-4 Conformance with Town Policies and Ordinances

Prior to the removal of any trees greater than six inches in diameter, a final analysis of the number and value of trees removed shall be prepared by a licensed forester or certified arborist. Prior to removal of any trees greater than six inches in diameter a tree removal permit must be approved by the Town. Said tree replacement shall be within the Project area, or off-site; as may be approved by the Community Development Director.

CUMULATIVE IMPACTS**Impact BIO-5 Cumulative Impacts**

The Project site is located in the North Village part of the Town and is surrounded by existing development. There are 40 related projects in the vicinity of the Project. Descriptions of the related projects are located in Table II, Related Projects, in Section II, Environmental Setting, of this Draft EIR. Related projects that are close enough to the Project site to have a direct cumulative biological impact in combination with the Project include Related Project Numbers 5, 6, 8, 12, 19 and 27 north of Lake Mary Road and Main Street, and 15, 22, and 36 south of Lake Mary Road and Main Street (refer to Figure II-11). Other related projects are scattered throughout the Town and consist of development ranging from ten unit residential projects to larger resort projects. With respect to the biological impacts identified under the Project described above, related projects in the area may also have potential to impact nesting birds, bats, and protected trees. However, with the measures proposed to mitigate these impacts under the Project, these impacts are not anticipated to be cumulatively considerable or significantly adverse when evaluated with other related projects in the vicinity.

The cumulative impacts discussion under Section IV.K, Population and Housing, of this Draft EIR notes that the Project, when considered with other related residential projects in the area, would result in an estimated Persons At One Time ('PAOT') population increase of 19,647 persons and would not exceed the Town's forecasted growth of 52,000 PAOT in the Town.²⁷ The anticipated population increase may have significant impacts upon special-status species within the surrounding Inyo National Forest's natural resources. However, policies listed in the General Plan require the Town to work closely with agencies, including the Inyo National Forest, to ensure that the regional natural ecosystem is maintained.

The Inyo National Forest is one of the ten most visited units in the Forest Service, and visitation to the Inyo National Forest and adjacent areas has been growing consistently over the past several years and is expected to grow at similar levels over the next 20 years.²⁸ The cumulative population growth from the Project and related residential projects of nearly 19,647 persons, and their potential impact to natural

²⁷ Town of Mammoth Lakes General Plan Policy L.1.A limits total peak population of permanent and seasonal residents and visitors to 52,000.

²⁸ Federal Highway Administration and Federal Transit Administration. Field Report – Inyo and Humboldt-Toiyabe National Forests Eastern Sierra Expanded Transit System.

resources in the Inyo National Forest is relatively insignificant compared to the impacts from the approximately 130,000 to 150,000 summer visitors and 1.3 million winter visitors to the Town.²⁹ However, while only 8.3 percent of the Forest's visitors are regional residents (from the 93546 and 93514 zip codes), regional residents account for nearly 25 percent of visitor frequency (regional residents had a visitor frequency of 124 as compared to 380 for other visitors).³⁰ The primary activities of forest users are viewing natural features, relaxing, hiking, walking, downhill skiing/snowboarding, cross country skiing, camping and fishing.³¹ Although many of these activities have generally low impacts on natural resources, particularly when conducted in accordance with existing Forest Service management controls (such as well-planned and maintained trails, camping area restrictions, limited wilderness area permits, and ski area capacity limits),³² a cumulative increase in these activities from additional frequent resident visitors may have an adverse impact on sensitive resources from excessive use, possibly resulting in erosion, habitat degradation, and wildlife habituation and disturbance.

Increased visitor use and the associated management of natural resources within the Inyo National Forest are being addressed by the United States Forest Service through planning efforts including the *USFS Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses Final Environmental Impact Statement* (FEIS), the *Inyo National Forest Winter Needs Assessment* conducted in collaboration with the Town in 2003 and 2004, and the *Inyo National Forest's Forest Land and Resource Management Plan*, which was updated by the *Record of Decision* (ROD) for the *Supplemental Environmental Impact Statement* (SEIS) of the *Sierra Nevada Forest Plan Amendment* (SNFPA).³³ In addition, the Inyo National Forest will need to update its Forest Land and Resource Management Plan, as it is nearly 20 years old and out-of-date,³⁴ in accordance with the *Sierra Nevada Forest Plan Amendment* (SNFPA). This document gives management direction to all forests to address problems of (1) old forest ecosystems and associated species, (2) aquatic, riparian, and meadow ecosystems, and (3) fire and fuels.³⁵

Impacts to natural resources within the Inyo National Forest from recreational use are expected to increase due to the Town's cumulative population increase from the Project and other regional residential projects, and these impacts may be considered cumulatively considerable or significantly adverse; however, identification and quantification of such impacts would be speculative under the current analysis. Potential impacts to sensitive natural resources within the Inyo National Forest were evaluated

²⁹ *Federal Highway Administration and Federal Transit Administration. Field Report – Inyo and Humboldt-Toiyabe National Forests Eastern Sierra Expanded Transit System.*

³⁰ *Inyo National Forest. 2003. National Visitor Use Monitoring Results, Inyo National Forest. USDA Forest Service, Region 5. August 2003.*

³¹ *Federal Highway Administration and Federal Transit Administration. Field Report – Inyo and Humboldt-Toiyabe National Forests Eastern Sierra Expanded Transit System.*

³² *CAJA Staff Personal Communication: Mike Schlafmann, U.S. Forest Service. July 5, 2006.*

³³ *U.S. Forest Service. 2004. Sierra Nevada Forest Plan Amendment, Final SEIS, Record of Decision. U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. January 2004.*

³⁴ *CAJA Staff Personal Communication: Mike Schlafmann, U.S. Forest Service. July 5, 2006.*

³⁵ *U.S. Forest Service. 2004. Sierra Nevada Forest Plan Amendment, Final SEIS, Record of Decision. U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. January 2004.*

as part of the Inyo National Forest's Land and Resource Management Plan Update associated with the 2004 SNFPA SEIS ROD. The SNFPA SEIS ROD reaffirmed that "providing recreation opportunities is one of the Forest Service's major missions in California, along with providing sustainable, healthy ecosystems."³⁶ The ROD notes that the projected tourism increase in the Sierra Nevada will contribute to an increased demand for recreation facilities and services, and that decisions for recreation activities will be made at the local level to reflect site-specific conditions.

In addition, compliance of the Project, and other development in the Town, with existing General Plan policies requiring the Town to work closely with regional agencies to ensure that the regional natural ecosystem is maintained, will address potential cumulatively considerable or significantly adverse impacts to sensitive natural resources. Thus, cumulative impacts to biological resources would be *less than significant* and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Biological resource impacts would be *less than significant* after implementation of the mitigation measures identified above.

³⁶ U.S. Forest Service. 2004. *Sierra Nevada Forest Plan Amendment, Final SEIS, Record of Decision*. U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. January 2004.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CULTURAL RESOURCES

INTRODUCTION

The information and analysis in this section is based primarily on the following report prepared for the Mammoth Crossing Project (“Project”), which is included in Appendix E of this Draft EIR:

- *Cultural Resources Survey and Evaluation of Historic Built Resources for the Mammoth Crossing Project, Mammoth Lakes, Mono County, California*, prepared by SWCA Environmental Consultants, February 2008 (i.e., “Cultural Resources Survey”).

ENVIRONMENTAL SETTING

Regional Cultural Setting

The archaeological record of central California is traditionally divided into temporal units based largely on changes in artifact types, styles, and frequencies of occurrence. This record reflects an increasingly complex economic and technological adaptation in the way native cultures subsisted within the context of California’s notably diverse environments. Along the Pacific Coast, native cultures developed maritime economies augmented by terrestrial plants and animals, while further inland they adapted to a series of altitude-sensitive biotic zones, including the sage scrub, chaparral, riparian, oak woodland, and pine forest communities. Settlement patterns, population movement, trade, and other modes of social culture provided behavioral matrices for the use of material culture to obtain and process natural resources.

Archaeological Setting

Archaeological surveys conducted throughout the Mammoth Lakes region have identified numerous archaeological sites throughout the region. The sites have been characterized as stoneworking and subsistence sites, including temporary hunting or seasonal base camps. Archaeological researchers in east-central California generally worked in isolation and gave localized names to the various archaeological periods they studied. The result was a plethora of names for each segment of the archaeological sequence, even though the same broad characteristics could be found over a large region. Based on this research, the five prehistoric periods proposed for the area include:

- Mojave Complex (pre-3500 B.C.; pre-5500 years before present [B.P.])
- Little Lake Period (3500–1500 B.C.; 5500–3500 B.P.)
- Newberry Period (1500 B.C.–A.D. 600; 3500–1275 B.P.), which is subdivided into:
 - Early Newberry Period (1500–800 B.C.; 3500–2800 B.P.)
 - Middle Newberry Period (800–300 B.C.; 2800–2300 B.P.)

- Late Newberry Period (300 B.C.–A.D. 600; 2300–1275 B.P.)
- Haiwee Period (A.D. 600–1300; 1275–650 B.P.)
- Marana Period (A.D. 1300 to historic contact; 650 B.P. to historic contact)

During the Mojave Complex and Little Lake Periods, human activity in the Long Valley region was most likely sporadic. During the Newberry Period obsidian quarrying and biface production, presumably for trade, were intensive in Long Valley. During the Haiwee and Marana periods, biface production decreased and subsistence activities focused around riparian areas. Subsistence was heavily influenced by the seasonal availability of resources. A partial abandonment of upland and desert scrub areas occurred after A.D. 1000.

Ethnographic Setting

The Town of Mammoth Lakes (Town) is located within an ethnographic boundary zone occupied by the Northern Paiute and the Owens Valley Paiute. Both groups are speakers of the Western Numic language family, with the Northern Paiute speaking the Northern Paiute language and the Owens Valley Paiute speaking the Mono language. Neighboring groups include the Monache to the west (who speak a dialect of Mono), the Southern Sierra Miwok to the northwest and the Western Shoshone to the east. Since the Project area occupies a transitional zone between Northern Paiute and Owens Valley Paiute, it is necessary to consider both groups to fully understand the occupation history of the Project area.

The Northern Paiute historically occupied an extremely large territory within the Great Basin in eastern California, western Nevada, and southeast Oregon, spanning approximately 70,000 square miles. The Owens Valley Paiute occupied the Owens Valley on a year-round basis with semi-permanent settlements located on major rivers and streams along the valley's west side. The area provided a variety of food sources, including but not limited to, fish, waterfowl, medium-size fauna such as deer and bighorn sheep, smaller fauna such as marmots in the foothills and mountains covered with piñon/juniper, Jeffrey Pine (*Pinus jeffreyi*), and lodgepole pine (*Pinus murrayana*). Wild seed and root crops were also an important food source. Subsistence was heavily influenced by the seasonal availability of resources. Trade between groups was very important, with most such activity occurring during the warm summer months when the high mountain passes were open.

Historic Setting

Post-contact history for the state of California is divided into three specific periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848–present). The beginning of Spanish settlement in California, which marked the devastating disruption of the culture of indigenous Californians, occurred in the spring of 1769. After the end of the Mexican Revolution (1810–1821) against the Spanish crown, all Spanish holdings in North America (including both Alta and Baja California) became part of the new Mexican republic. With the Mexican Period, an era of extensive land

grants was begun, in contrast to the Spanish colonization through missions and presidios. Victory in the Mexican-American War (1846–1848) resulted in Mexico releasing its northern territories (now the states of California, Arizona, Colorado, New Mexico, and part of Utah) to the United States under the Treaty of Guadalupe Hidalgo in 1848. Even though California became a territory of the United States, the full impact of “Americanization” would not occur until the discovery of gold in 1848.

European settlement of the Project area began with the arrival of prospectors searching for gold strikes in the area during the late 1870s. In 1877 four prospectors searching for the Lost Cement Mine organized the Lakes Mining District on Mineral Hill near Lake Mary. The following year General George Dodge of Civil War and Union Pacific fame bought the claims and organized the Mammoth Mining Company. People began to arrive on news that the company was running four tunnels into Mineral Hill and constructing a tramway and a 20-stamp mill. Rumors also abounded that this was the “largest bonanza outside Virginia City.” In 1878 several mining camps were established in the Lakes Basin including Mammoth City, Pine City, Mineral Hill, Mill City, and Mineral Park. By the summer, over a thousand people had arrived in Mammoth City and approximately 1,500 the following year. The bonanza did not materialize, however, and in 1880 the Mammoth Mining Company shut down. After the Mammoth Mines closed, most of the mining camps were abandoned. The bonanza did not materialize, however, and in 1880 the Mammoth Mining Company shut down. After the Mammoth Mines closed, most of the mining camps were abandoned. A few settlers remained in Mineral Park (now known as Old Mammoth) and took up occupations as mill workers supplying lumber to the community of Bishop and cowhands driving cattle from Owens Valley into the mountain meadows for summer and fall grazing. During the early 1900’s, Old Mammoth began to be promoted as a tourist destination and resort community, and tourism became the most important industry in the region. The completion of a modern highway in 1937 made the area accessible to great numbers of people who continue to use the area for both summer and winter outdoor recreational activities. McGee (now Mammoth) Mountain became a downhill ski destination in 1941 with the establishment of a portable rope tow, the most primitive of modern ski lifts. The first chair lift was installed in 1955; the resort currently has 32 lifts. Mammoth Mountain is a year-round ski resort, encompassing more than 3,500 acres. The Town was established in 1984 and currently the community has an estimated population of more than 7,000 persons. The Project is located in the area of Town now known as the “North Village”.

Site Specific Conditions

As discussed in Section II, Environmental Setting, the Project is comprised of four separate sites located in the northwest portion of Town commonly known as the North Village. Portions of each of the three Project sites within the area of potential effect have been previously developed. The following is a discussion of each Project site’s present condition.

Project Site 1

Nearly the entire surface area of Site 1 has been previously developed, with two buildings occupying the northwestern and southeastern corners of the property and a paved parking lot in between. The building located at 60 Lake Mary Road is a commercial office building that was built less than 45 years ago. The second building, located at 24 Lake Mary Road, is the Whiskey Creek restaurant, which was also built less than 45 years ago. Open space within the Site 1 consists of small planter areas along the side of both buildings, and along the retaining wall located on the northern border of the site.

Project Site 2

Site 2 is partially developed with building fronts on Lake Mary Road. The ten buildings on this Project site include the former St. Joseph's Church, a two-story office building, a log building (Sartori Cabin/Mammoth Cable Television), and several buildings which comprise the North Village Inn. Eight of the buildings in the Project site were built less than 45 years ago or are of unknown age.

Project Site 3

Site 3 is partially developed with two motel buildings located along the western edge of the site. Both are two-story buildings surrounded by paved parking lots. The buildings are called the Ullr Lodge, and the White Stag Inn. The White Stag was built less than 45 years ago. The Ullr Lodge was built in four segments. The first segment of the building includes the picturesque façade and was completed in 1963, the contiguous second section in 1967, the third was built in 1969 and the final portion, the manager's house, was completed in 1979.

Project Site 4

As previously discussed, Site 4 is undeveloped. No new development is proposed on Site 4 as part of this Project, though developed is proposed on Site 4 as part of a previously approved project. The proposed development consists of 45 residential units and was previously approved by the Town, and a Mitigated Negative Declaration adopted pursuant to CEQA.

METHODOLOGY

Literature Review and Records Search

A cultural resources records search for the Project was performed by California Historical Resources Information System (CHRIS) Eastern Information Center (EIC) staff on October 23, 2007.¹ Other than official maps and records, the following sources of information at the EIC were consulted as part of the record search:

- National Register of Historic Places – Listed Properties (2006, updated to present)
- California Register of Historical Resources (2006, and review of minutes from State Historic Resources Commission meetings thereafter)
- California Inventory of Historical Resources (1976)
- California State Historical Landmarks (1996 and updates)
- California Points of Historical Interest (1992 and updates)
- Office of Historic Preservation Historic Property Directory and Determinations of Eligibility (2006)

The records search performed by the EIC indicated that 23 cultural resources studies have been conducted within a one-half mile radius of the Project area. Three of these surveys included the Project area, and three additional surveys are immediately adjacent to the Project area.

Seven cultural resources have been previously recorded within a one-half mile radius of the Project. These resources include: two historic period refuse deposits (26-3575 and 29-4357), and four lithic scatters² (26-3727, CA-MNO-2480, CA-MNO-2481, and CA-MNO-2482). No cultural resources have been previously recorded within the Project limits.

Pedestrian Survey

The Project's development area encompasses approximately nine acres and is divided into three assemblages of parcels which comprise the area of potential effect (designated herein as Sites 1, 2, and 3), and which are located on the northwest, southwest, and southeast corners of the intersection of Main

¹ Included in Appendix B of SWCA Environmental Consultants' Cultural Resources Survey, included in Appendix E of this Draft EIR.

² A lithic scatter is a distribution of cultural items that consist primarily of lithic (i.e., stone), which may include formed tools or chipping debris from tool-making activities.
(U.S. Department of Energy – Office of Fossil Energy, Glossary, website:
http://www.fossil.energy.gov/programs/reserves/spr/publications/2006_SPR_EIS/6_Gloss.pdf, February 14, 2008.)

Street, Lake Mary Road and Minaret Road, respectively (refer to Figure II-2, Aerial Photograph, in Section II, Environmental Setting). Each site was intensively surveyed by SWCA Environmental Consultants (SWCA) by walking linear transects spaced 10 meters apart. In areas of existing buildings and pavement, the survey consisted of checking planters, pathways, cut backs, and other open spaces where the ground surface was exposed. The ground surface was examined for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historic artifacts (e.g., metal, glass, ceramics), sediment discoloration that might indicate the presence of a cultural midden, depressions and other features indicative of the former presence of structures or buildings (e.g., postholes, foundations).

Architectural Survey

Following the pedestrian survey, SWCA evaluated the Project site's built environment at an intensive level for California Register eligibility. This included obtaining data from local repositories and using various local sources, augmented by internet research and telephone interviews. Eligibility for local landmark designation was not addressed as it lies beyond the purview of this report and the Project scope, and does not necessarily equate to historical significance under CEQA.

Properties containing buildings which retain "substantial integrity," or if reasons exist to believe the property might possess overriding significance, were intensively evaluated for California Register eligibility. Besides possessing one of the previously-listed significance characteristics, to be eligible for listing in the California Register resources must retain substantial integrity to their period of significance. The California Office of Historical Preservation 2002 guidance on the subject asserts "resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance."

As set forth in the National Park Service publication *How to Apply the National Register [of Historic Places] Criteria for Evaluation* (n.d.), the seven aspects or qualities that, in various combinations, define integrity are: location, design, setting, materials, workmanship, feeling and association. To retain its historic integrity, a property must possess several, and usually most, of these aspects. Properties judged not to retain requisite integrity were not evaluated for historic significance. Buildings constructed after the mid-1960s were not evaluated for historic significance. The seven aspects or qualities that, in various combinations, define integrity are: location, design, setting, materials, workmanship, feeling and association. To retain its historic integrity, a property must possess several, and usually most, of these aspects.

The Project area includes 16 parcels, of which four properties containing buildings constructed in or before 1962 were inspected. The investigation established whether or not improvements were still extant, or if alterations had reduced their integrity as defined in the California Register guidance. In addition, all properties were surveyed by vehicle, digitally photographed, and notes were made regarding alterations. Only properties which were found to possess sufficient integrity to qualify for California Register

consideration were recorded on State of California and The Resources Agency Department of Parks and Recreation (DPR) 523 forms.³

Native American SB-18 Tribal Consultation & Sacred Lands File Search

Pursuant to Government Code Section 65352.3 SWCA contacted the California Native American Heritage Commission (NAHC) by letter to request a list of Native American groups or individuals listed by the NAHC as contacts within the vicinity of the Project area, in addition to a review of the Sacred Lands File. The NAHC responded on November 8, 2007, with a list of six tribal entities:

- Benton Paiute Reservation
- Big Pine Band of Owens Valley
- Big Pine Band of Owens Valley THPO
- Bishop Paiute Tribe THPO
- Bridgeport Paiute Indian Colony
- Mono Lake Indian Community

Pursuant to Senate Bill 18 of 2005 (SB 18) the Town sent consultation letters to each of the six NAHC-listed tribal entities on November 27, 2007, inviting each group to consult with them directly regarding the potential for the presence of Native American cultural resources that may be impacted by the Project. As a follow up to the consultation letters, the Town contacted each of the tribes via telephone on December 7, 2007. To date, none of the six NAHC-listed tribal entities has responded.

Concurrent with the Town's efforts to conduct government-to-government Native American consultation in compliance with SB 18, SWCA initiated its own initial Native American consultation for the Project on November 5, 2007 in preparation of the Cultural Resources Study for the Project. SWCA sent consultation letters to each of the six NAHC-listed tribal entities on October 16, 2007, inviting each group to consult with them directly regarding the potential for the presence of Native American cultural resources that may be impacted by the Project. In addition to providing the list of tribal entities, the letter dated November 8, 2007, revealed that no Native American cultural resources were known in the Project area.

SWCA received one response by telephone from Bill Helmer, Tribal Historic Preservation Officer (THPO) for the Big Pine Band of Owens Valley. Mr. Helmer asked about the SB 18 consultation and

³ *Included in Appendix C of SWCA Environmental Consultants' Cultural Resources Survey, included in Appendix E of this Draft EIR.*

why SWCA was conducting additional consultation. Mr. Helmer did not provide information regarding cultural resources within the Project area. The Native American consultation correspondence is presented in Appendix E of this Draft EIR.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Based on Appendix G of the State *CEQA Guidelines*, a project would have a significant impact on cultural resources if the project would:

- (a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;
- (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- (c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
or
- (d) Disturb any human remains, including those interred outside of formal cemeteries.

For purposes of CEQA, to determine whether cultural resources could be significantly affected, the significance of the resource itself must first be determined. Section 15065 of the State *CEQA Guidelines* mandates a finding of significance if a project would eliminate important examples of major periods of California history or prehistory.

In addition, pursuant to Section 15064.5 of the State *CEQA Guidelines*, a project could have a significant effect on the environment if it “may cause a substantial adverse change in the significance of an historical resource.” A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired.” Material impairment means altering “...in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.” Impacts to those cultural resources not determined to be significant according to the significance criteria described above are not considered significant for the purposes of CEQA.

Historical Architectural Resources

Pursuant to Section 15064.5 of the State *CEQA Guidelines*, a historical resource (including both built environment and prehistoric archaeological resources) is presumed significant if the structure is listed on the California Register of Historical Resources (CRHR) or has been determined to be eligible for listing by the State Historical Resources Commission. The criteria for eligibility of listing in the California Register are based upon National Register criteria. To be eligible for listing in the California Register, a

property must be at least 50 years of age and possess significance at the local, state, or national level. A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the CRHR. The criteria are as follows:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. The resource is associated with lives of persons important in our past;
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

A resource less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance.⁴

Archaeological Resources

Pursuant to Section 15064.5 of the State *CEQA Guidelines*, archaeological resources, not otherwise determined to be historical resources, may be significant if they are unique. Pursuant to Public Resources Code Section 21083.2, a unique archaeological resource is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets one of the following criteria:

1. The resource contains information needed to answer important scientific questions and there is a demonstrable public interest in that information;
2. The resource has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
3. The resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

A non-unique archaeological resource means an archaeological artifact, object, or site that does not meet the above criteria. Non-unique archaeological resources receive no further consideration under CEQA.

⁴ *California Code of Regulations (CCR) Section 4852.*

Human Remains

According to Section 15064.5 of the State *CEQA Guidelines*, all human remains are a significant resource. Section 15064.5 of the State *CEQA Guidelines* also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are spelled out under Public Resources Code Section 5097.

Paleontological Resources

According to Appendix G of the State *CEQA Guidelines*, a project could have a significant effect if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Portions of each of the three Project development sites within the area of potential effect have been previously developed. As such, the Project may have the potential to impact cultural resources (including historical, archaeological, and paleontological resources, as well as human remains) that are either known to exist within the Project’s three development sites or have potential to be buried within the sites. Following is a discussion of potential Project impacts to known and unknown cultural resources.

Impact CULT-1 Impacts to Known Cultural Resources

As previously stated, the Project area includes 16 parcels and each parcel was intensively surveyed by walking linear transects spaced 10 meters apart. No prehistoric or historic archaeological resources were identified within the Project area. Four of the properties within the Project area contain buildings constructed in or before 1962. Sixteen buildings or structures were identified in the Project area, three of which were found to possess sufficient integrity to qualify for the California Register and were recorded on DPR 523 forms.⁵ The following discussion is broken down by each of the Project's three development sites.

Project Site 1

As previously discussed, nearly the entire surface area of Site 1 has been previously developed, with two buildings occupying the northwestern and southeastern corners of the property and a paved parking lot in between. The two buildings, located at 24 and 60 Lake Mary Road, include a commercial office building and the Whiskey Creek restaurant, respectively. The commercial office building was not intensively evaluated for CRHR eligibility. Both buildings were built less than 45 years ago and are therefore not eligible for listing in the CRHR.

Project Site 2

Site 2, as previously discussed, is partially developed with ten buildings that include the following: the former St. Joseph's Church, a two-story office building, a log building (Sartori Cabin/Mammoth Cable Television), and several buildings which comprise the North Village Inn. Two of these buildings—St. Joseph's Church/Mammoth Cable Television office and the Sartori Cabin/Mammoth Cable Television office—were evaluated for listing in the CRHR and DPR 523 forms filled out,⁶ however, neither building was found eligible for listing in the CRHR as described below.⁷

The St. Joseph's Church/Mammoth Cable Television office building lacks integrity and it has no known associations with significant patterns of events (Criterion 1); there are no direct associations with persons significant in our past (Criterion 2); the altered building does not possess high artistic values (Criterion 3); and it does not seem likely that the property would yield important prehistoric or historic information (Criterion 4).

The Sartori Cabin/Mammoth Cable Television office has been altered and relocated building has no known associations with significant patterns of events (Criterion 1); it does not retain the integrity of its

⁵ Included in Appendix C of SWCA Environmental Consultants' Cultural Resources Survey, included in Appendix E of this Draft EIR.

⁶ Ibid.

⁷ Ibid.

direct association with Joseph Sartori, a person significant in our past (Criterion 2); the altered building no longer possesses high artistic values because of the alterations (Criterion 3); and it is not likely to yield important prehistoric or historic information (Criterion 4).

None of the other buildings in this Project site are eligible for listing in the CRHR either as they were built less than 45 years ago or are of unknown age.

Project Site 3

As discussed above, Site 3 is partially developed with two motel buildings located along the western edge of the site: the Ullr Lodge and the White Stag Inn. The White Stag was built less than 45 years ago, and is not eligible for listing in the CRHR. The Ullr Lodge was built in four segments. The altered Ullr Lodge is not eligible for listing in the California Register separately or as a contributor to a district. It has no known associations with significant patterns of events (Criterion 1); there are no direct associations with persons significant in our past (Criterion 2); the altered buildings do not possess high artistic values (Criterion 3); and it is not likely to yield important prehistoric or historic information (Criterion 4).

None of the properties in the Project area are separately eligible for listing in the California Register. Furthermore, none of the properties in the Project area are eligible for listing in the California Register as historic districts or as contributors to historic districts. The appropriate California Historical Resource Status Codes (California Office of Historic Preservation 2003) for each of these properties is “6Z- Found ineligible for...California Register...designation through survey evaluation.” No local landmark eligibility finding was made as part of this evaluation. Because the properties in the Project area were not found eligible for listing in the California Register, they would not, at this time, qualify for National Register of Historic Places listing.⁸

Because none of the properties in the Project area of potential effects is eligible for listing in the California Register, the Project is not expected to result in the physical demolition, destruction, relocation, or alteration of any historical resources. The Project would not result in significant impacts to any previously recorded cultural resources located within the Project site. Any Project-related impacts associated with the construction and operation of the Project would be considered *less than significant* and no mitigation measures would be required.

⁸ *National Register of Historic Places guidance has a 50-year cut-off for evaluation of buildings, structures or objects, unless the improvements possess “exceptional importance at the national, State, or local level” (Criteria Consideration G).*

Impact CULT-2 Impacts to Unknown Cultural Resources

As discussed in the “Environmental Setting” above, the Project site and immediate vicinity have been subjected to multiple cultural resources studies. Seven cultural resources have been previously recorded within a one-half mile radius of the Project. These resources include: two historic period refuse deposits (26-3575 and 29-4357), and four lithic scatters⁹ (26-3727, CA-MNO-2480, CA-MNO-2481, and CA-MNO-2482). No cultural resources have been previously recorded within the Project limits, nor were any prehistoric or historic archaeological resources identified within the Project area during the intensive-level pedestrian survey. In addition, all properties within the Project area were found to be ineligible for listing in the California Register, and at this time would not qualify for National Register of Historic Places listing; therefore, none are a historical resource under CEQA.

Based on the paucity of previously recorded cultural resources in the literature search area and lack of identified prehistoric and historic archaeological resources within the Project area the Project is not sensitive for prehistoric and historic archaeological resources. While ground-disturbing construction associated with the Project has the potential to result in **significant** impacts to unrecorded buried archaeological deposits it is unlikely that any such deposits occur. However, the following mitigation measures are recommended below that would reduce any such impacts to unknown cultural resources to a less-than-significant level.

Mitigation Measure CULT-2a Impacts to Unknown Cultural Resources

If previously unrecorded archaeological materials are identified during construction grading, work in the area should be temporarily halted or redirected and a qualified archaeologist meeting the Secretary of the Interior’s standards for Archaeology¹⁰ and a Native American monitor shall be notified to evaluate the cultural find. If the archeologist determines that the site should be capped, the archeologist and Native American Monitors shall be on site during any capping activities. The archeologist and Native American Monitors shall be compensated for their services by the Project Applicant. The procedure to select and designate the archeologist and Native American Monitors shall be selected and designated as described in the Mitigation Monitoring Program as identified in the Final EIR.

⁹ A lithic scatter is a distribution of cultural items that consist primarily of lithic (i.e., stone), which may include formed tools or chipping debris from tool-making activities.

(U.S. Department of Energy – Office of Fossil Energy, Glossary, website:

www.fossil.energy.gov/programs/reserves/spr/publications/2006_SPR_EIS/6_Gloss.pdf, February 14, 2008.)

⁸ National Park Service, *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines [As Amended and Annotated]*, website: http://www.nps.gov/history/local-law/arch_stnds_9.htm, February 14, 2008.

Mitigation Measure CULT-2b Impacts to Unknown Cultural Resources

A qualified archaeologist and Native American monitor as selected and as needed per requirements identified in Mitigation Measure CULT-2a shall monitor ground-disturbing. The monitors shall be supplied with maps and site records for the previously recorded cultural resources within the Project site. The monitors shall prepare daily monitoring logs recording the type of work monitored, soil conditions, discoveries, and general observations.

Mitigation Measure CULT-2c Impacts to Unknown Cultural Resources

Previously unknown cultural resources identified during Project construction shall be protected through temporary redirection of work and possibly other methods such as fencing until formally evaluated for significance under CEQA. In the event that previously unrecorded cultural resources are exposed during construction, the archaeologist and Native American monitors as selected and as needed per requirements identified in Mitigation Measure CULT-2a shall be empowered to temporarily halt construction in the immediate vicinity of the discovery while it is documented and evaluated for significance. The monitors shall provide consultation when resources are found to determine how the resources shall be handled. If the selected Native American monitor and the Project Applicant cannot agree upon the proper treatment, the qualified archeologist monitoring the ground disturbing activities shall make the decision. Construction activities may continue in other areas. If the discovery is evaluated as significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate Project-related impacts to a less-than-significant level if preservation is not possible.

Mitigation Measure CULT-2d Impacts to Unknown Cultural Resources

Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Mono County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendent (“MLD”) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, re-inter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD’s recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measure CULT-2e Impacts to Unknown Cultural Resources

A monitoring report shall be prepared upon completion of construction monitoring, summarizing the results of the monitoring effort by the qualified archaeological monitor as selected and as needed per requirements in Mitigation Measure CULT-2a. Site records for any newly recorded or updated cultural resources shall be appended to the monitoring report.

Mitigation Measure CULT-2f Impacts to Unknown Cultural Resources

Artifacts or samples collected during the course of construction monitoring and any testing or data recovery associated with newly discovered resources by the qualified archaeological monitor and Native American monitor as selected and as needed per requirements identified in Mitigation Measure CULT-2a shall be curated in perpetuity in an appropriate facility upon completion of analysis and processing.

CUMULATIVE IMPACTS***Impact CULT-3 Cumulative Impacts***

Implementation of the Project in combination with the related projects as listed in Table II-1 in Section II, Environmental Setting, of this Draft EIR, would result in the development of additional low- to high-density residential, commercial, institutional, and public resort land uses. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. Impacts to cultural resources (including historic, archaeological, and paleontological resources, as well as human remains) tend to be site-specific and are assessed on a site-by-site basis. The extent of the cultural resources (if any) that occur at the related project sites is generally unknown and, as such, it is not known whether any of the related projects would result in significant impacts to cultural resources. However, similar to the Project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's impacts to cultural resources concluded that, through the implementation of the mitigation measures recommended above, project-related impacts to cultural resources would be less than significant. Therefore, the Project would not contribute to any potential cumulative impacts, and cumulative impacts to cultural resources would be ***less than significant*** and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the mitigation measures recommended above, the Project's impacts to cultural resources would be reduced to a ***less-than-significant*** level.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

F. GEOLOGY AND SOILS

INTRODUCTION

The information and analysis in this section is based primarily on the following report for the Mammoth Crossing Project (“Project”), which is included in Appendix F of this Draft EIR:

- Preliminary Geotechnical Investigation – Mammoth Crossing – 3 Corners, Mammoth Lakes, California, prepared by Sierra Geotechnical Services, Inc., November 30, 2007 (i.e., “Geotechnical Study”).

ENVIRONMENTAL SETTING

Regional Geology and Soils

The Project site is located in the western portion of the Long Valley caldera between the western margin of the caldera’s resurgent dome and the eastern flank of the Sierra Nevada fault escarpment (a fracture or fracture zone along which there has been displacement of one side with respect to the other). The United States Geological Survey (“USGS”) defines a caldera as a large, usually circular depression at the summit of a volcano formed when magma is withdrawn or erupted from a shallow underground magma reservoir. The removal of large volumes of magma may result in loss of structural support for the overlying rock, thereby leading to collapse of the ground and formation of a large depression. The Long Valley caldera is elongated in an east-west direction and was formed approximately 760,000 years ago by volcanic eruptions fed by a large magma chamber in the shallow crust. Despite recent activity in the resurgent dome east of Mammoth Mountain, the resurgent dome has experienced eruption only once every 100,000 to 200,000 years and last erupted approximately 50,000 years before present (“B.P.”).¹

Earthquake and volcanic activity over the past four million years has created the eastern Sierra Nevada landscape in the vicinity of Long Valley Caldera and the Mono Basin. The high mountains around Mammoth Lakes constitute the caldera walls with the Glass Mountains forming the west and southwest walls and the Benton Range forming the east wall. Mammoth Mountain is a smaller dome on the rim of the caldera formed by repeated eruptions from vents on the southwest rim of the caldera 220,000 to 50,000 years ago. The caldera, as well as other geologic features including Devil’s Postpile, Mammoth Rock, and Crystal Crag, provides evidence that the region around the Town of Mammoth Lakes (“Town”) is geologically young with an active recent history.²

The Town is underlain by a variety of rock types, including Pliocene to Recent volcanic and pyroclastic deposits (12 million years old to less than 10,000 years old), Pleistocene glacial deposits (2.5 million to

¹ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007.*

² *Ibid.*

10,000 years old), and Holocene alluvium (less than 10,000 years old). Soils are derived from these geologically recent deposits. Bedrock below volcanic deposits in the Mammoth Lakes area is predominately Mesozoic granitic rock of the Sierra Nevada batholith. A batholith is a large emplacement of igneous intrusive (also called plutonic) rock that forms from cooled magma deep in the Earth's crust. Batholiths are almost always made mostly of felsic or intermediate rock-types, such as granite, quartz monzonite, or diorite. The batholith is a series of intrusions that displaced overlying ancient sedimentary sea floor rocks during the Jurassic and Cretaceous Periods. Piedmont glaciation occurred throughout the Pleistocene, leaving a mantle of glacial till covering the basement and volcanic rocks throughout the area now occupied by the Town.

The Project area is located entirely on a debris-avalanche deposit formed by a rock avalanche off the northeast face of Lincoln Peak that dates approximately 50,000 years B.P. Predominant basement rock types of the Sierra Nevada include Cretaceous granitics with associated Paleozoic roof pendants (downward extension of the surrounding rock that protrudes into the upper surface of an igneous intrusive body)³ along the west margin of Mono Basin, and to a lesser degree, Paleozoic meta-sedimentary (sedimentary rock showing evidence of having been subject to metamorphism) formations mantled by Pleistocene glacial tills (heterogeneous [unsorted]) coarsely-graded glacial sediment).

Soils beneath the Town are classified as Frigid and Cyric and are typically gravelly loams with low water capacity generally developed on glacial outwash south of Mary Lake Road and on glacial moraines to the north of Mary Lake Road. Soils are sensitive to disturbances by development and have a moderate to high erosion potential, depending on the steepness of the slope. Soils derived from alluvial deposits are located in Sherwin Meadows. These soils, derived from water lain sediments deposited in relatively gentle terrain, are among the least erosion sensitive soils in the region. Additionally, loose, unconsolidated colluvial deposits with a moderate to high erosion and landslide potential are located on the slopes of Mammoth Mountain and Mammoth Rock.

Topographic Setting

The topography of the Mammoth Lakes area ranges from rolling alluvial plains at approximately 7,200 feet above mean sea level (“msl”) in Long Valley to approximately 11,600 feet above msl at the summit of Mammoth Mountain. An alluvial plain is a relatively flat and gently sloping landform found at the base of a range of hills or mountains, formed by the deposition of alluvial soil over a long period of time by one or more rivers coming from the mountains. In general, alluvial material consists of loose to medium dense, moist sand, silty sand, and clayey sand with cobble, boulders, and a moderate amount of roots. Slope gradients range from relatively flat areas in Sherwin Meadow and Long Valley to slopes of

³ *Encyclopedia Britannica, Roof Pendant, website: <http://www.britannica.com/bsp/topic/509191/article-9083889#tab=active~checked%2Citems~checked%3E%2Fbps%2Ftopic%2F509191%2Froof-pendant&title=roof%20pendant%20--%20Britannica%20Online%20Encyclopedia>, February 15, 2008.*

50 percent or greater on Mammoth Mountain. Slopes exceeding 30 percent are found in portions of Old Mammoth (particularly the bluff areas), Mammoth Slopes, Westridge, and the Mammoth Knolls.

Volcanic Setting

The Mono and Inyo Craters comprise a young volcanic chain with a violent history. At least 30 known volcanic events have occurred in the Mono Lake Long Valley area in the past 2,000 years. Most recently, in 1890, a phreatic type eruption (steam, water, mud and other gases, as a result of magma heating groundwater) occurred 35 miles north of the Town beneath the southern portion of Mono Lake. Another eruption in the area is likely to occur within the next thousand years. During the past 3,000 years the Mono-Inyo Craters have erupted at intervals of 700 to 250 years. The USGS estimates that eruptions at the Mono-Inyo Craters volcanic field have historically occurred at approximately 500-year intervals over the past 2,000 to 3,000 years. The most recent eruption in the region was at Mono Lake between 1720 and 1850. The occurrence of four earthquakes in the Long Valley area in May of 1980 with a Richter magnitude of 6 initiated a new phase magmatic activity and heightened potential for volcanic eruptions. Since the 1980s, frequent low magnitude (Richter magnitude less than 3.0) seismic activity indicates deep magmatic movement. The central portion of the Long Valley Caldera has risen more than 30 inches since the late 1970s, possibly in response to the filling of a shallow magma chamber.⁴

Carbon Dioxide

Following a period of earthquakes beneath Mammoth Mountain in 1989, magmatic gases (high levels of carbon dioxide in the soil) were determined to be killing approximately 120 acres of trees in certain portions of the caldera in 1990. Most notably, between 50 and 150 tons of carbon dioxide gas are emitted daily at the north end of Horseshoe Lake where approximately 30 acres of trees have been killed. Additional areas of carbon dioxide discharge are scattered around Mammoth Mountain primarily outside of the Mammoth Mountain Ski Area. Winter closures are implemented in a few small areas within the Mammoth Mountain Ski Area where carbon dioxide concentrations are potentially dangerous. Areas of discharge are also located outside of the established trails of Tamarack Cross-Country Ski Center. There is no indication that the area of carbon dioxide discharge has increased since 1995.^{5,6}

The source of the carbon dioxide is a large gas reservoir located deep underground related to long-term magmatic degassing beneath Mammoth Mountain. Because carbon dioxide is heavier than air, the USGS indicates that carbon dioxide gas can accumulate in snowbanks, depressions, and poorly ventilated enclosures, including structures, posing a potential danger to people. Concentrations are highly variable depending on wind and weather conditions. USGS scientists closely monitor the volcanic activity in the

⁴ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007.*

⁵ *Horseshoe Lake and Vicinity CO₂ Phenomenon, USDA Forest Service, January 28, 2000.*

⁶ *The USDA Forest Service's article "Horseshoe Lake and Vicinity CO₂ Phenomenon" (January 28, 2000) is included in Appendix F of this Draft EIR.*

region in order to provide the public with reliable and timely warning of volcanic unrest within the Long Valley area. Carbon dioxide is further discussed in Section IV.C, Air Quality, of this Draft EIR.

Site Geology and Soils

Soils in the vicinity of the Project area include undocumented fill, colluvium, alluvium, and pyroclastic tephra fall deposits.

Undocumented Fill

Undocumented fill was encountered in various test pits drilled on the Project's three sites. Fill thickness ranged from approximately two- to 7.5-feet. The undocumented fill soils consisted of a light to medium brown, and mottled brown to mottled grayish-brown, moist, loose to medium dense, silty, very fine to coarse-grained sand with few cobbles, boulders, and few to abundant roots and debris.

Colluvium

Colluvium was encountered in one test pit on Project Site 2 to an approximate depth of 3.5-feet below the existing grades. The colluvium consisted of a light brown, moist, loose to medium dense, silty, very fine to medium-grained sand with few gravels, and abundant roots.

Alluvium

Alluvial deposits were encountered in two test pits drilled on the Project's three sites to an approximate depth of 3.5-feet below existing grades. The alluvium consisted on light-brown, moist, loose to medium dense, very fine to medium sand with few to abundant cobble, few boulders to approximately 18-inches diameter, and few to abundant roots.

Pyroclastic Tephra Fall Deposits

Pyroclastic deposits were encountered in all test pits at depth. The pyroclastics consisted of light to medium brown and light gray to light grayish-brown, moist, loose to dense, massive, very fine to coarse sand and ash with abundant gravels, cobble clasts and boulders to approximately 48-inches diameter. These deposits were weakly- to well-cemented, and massive. Rock contents generally ranged between 30 to 50 percent of the deposit. The thickness of the pyroclastic deposits was not determined during a geotechnical investigation.

Hydrologic Setting

Surface waters on the site are regionally confined to the 71 square mile east-draining Mammoth Hydrologic Basin, which contains six distinct major watersheds, all of which are tributaries to Owens River and Crowley Lake.

The Project site has been determined to be outside the 500-year flood plain boundary. The nearest 100- and 500-year special flood zone hazard areas are located along Mammoth Creek to the south.

Groundwater

The generalized static groundwater level is approximately 100-feet below the ground surface with a gradient dipping due east. In addition, the Mammoth Community Water District/USGS production water Well No. 17, located in proximity to the Project site, has a mean static water depth of 375-feet below the ground surface.

Seismicity and Seismic Hazards

The Mono Lake Long Valley region is part of one of the most active seismic regions in the United States. The two main sources of earthquakes within this region are tectonic and those generated by the movement of magma or the formation of cracks through which magma can move. Tectonic earthquakes occur from rapid displacement on faults as a result of regional geologic stresses.

Earthquakes in the Mammoth Lakes area are a result of both tectonic and magmatic activity. There are several active or potentially active fault zones within 60 miles of the Town. Faults that have been active in the last 200 years include the Mono Lake, June Lake, and Hilton Creek faults in the northern extension of the Sierra Nevada Boundary fault system and main trace of the Sierra Nevada fault and the Owens Valley fault in the southern extension of the Sierra Nevada Boundary fault system. Faults that have been active during the last two million years include the Bodie Hills, White Mountains, Death Valley Furnace Creek, and Saline Valley faults. Within the vicinity of the Town, Hilton Creek, Owens Valley, Hartley Springs, Laurel Convict, Long Valley Caldera, Mono Craters Caldera, Silver Lake, and Wheeler Crest faults as well as the Chalfant Valley Fractures have the potential to induce ground shaking within the Town.⁷ The location of these faults relative to the Project site is noted in Table IV.F-1 and Figure IV.F-1 below. The nearest known active regional fault is the Hartley Springs fault located approximately 0.7 miles (1.7 kilometers) west of the Project sites. The Hartley Springs fault is classified as a type “B” seismic source, capable of producing a magnitude (M_w) 6.6 earthquake.

⁷ The USDA Forest Service’s article “Horseshoe Lake and Vicinity CO₂ Phenomenon” (January 28, 2000) is included in Appendix F of this Draft EIR.

**Table IV.F-1
Regional Faults and Seismicity**

Fault Segment	Approximate Distance from Project Site (km)	Maximum Magnitude
Hartley Springs	1.2	6.6
Hilton Creek	9.9	6.7
Round Valley	23.3	6.8
Mono Lake	33.5	6.6
Mohawk – Honey Lake Zone	39.1	7.3
Fish Slough	42.7	6.6
White Mountains	52.6	7.1
Robinson Creek	63.6	6.4
Death Valley (N. of Cucamonga)	72.6	7.0
Owens Valley	73.7	7.6
Birch Creek	79.6	6.4
Foothills Fault System	83.2	6.5
Deep Springs	86.4	6.6

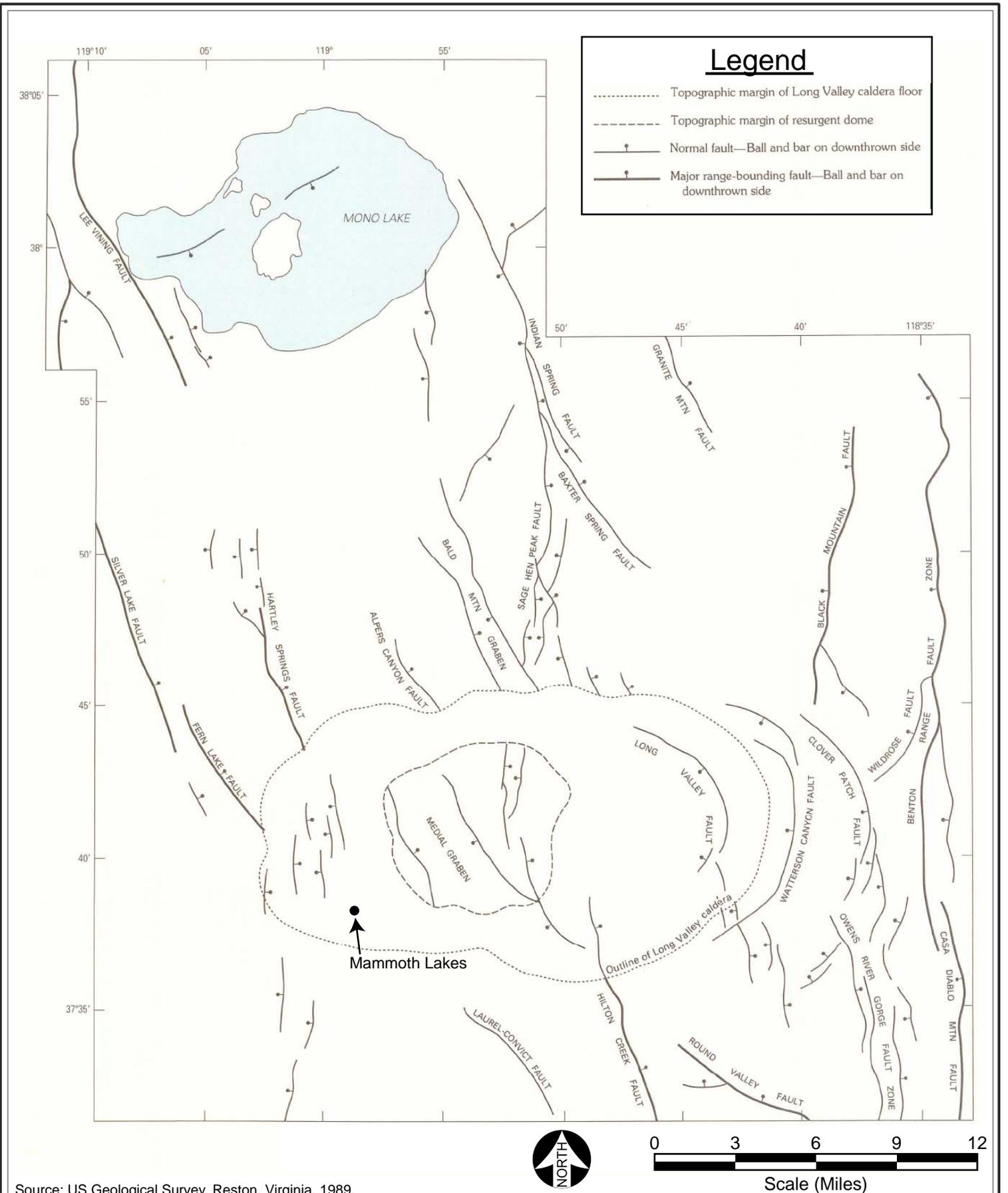
Source: Geotechnical Study, 2007.

The Town could experience considerable seismic activity in the future due to a high degree of crustal faulting in the Mono Lake and Long Valley area (which may lead to the release of tectonic strain by frequent small or moderate earthquakes), the present frequent moderate earthquakes and earthquake swarms along the Sierra Front Fault (which indicate the potential for a large earthquake), and the movement of magma beneath the caldera (which may be the cause of seismic events below the Long Valley Caldera).

Ground Motion

Ground motion is generated during an earthquake as two blocks of the Earth's crust slip past each other. In general, ground motion is greatest near the epicenter, increases with increasing magnitude, and decreases with increasing distance. However, the ground motion measured at a given site is influenced by a number of criteria, including depth of the epicenter, proximity to the projected or actual fault rupture, fault mechanism, duration of shaking, local geologic structure, source direction of the earthquake, underlying earth material, and topography.

Earthquake magnitude is a quantitative measure of the strength of an earthquake or the strain energy released by it, as determined by seismographic or geologic observations. Earthquake intensity is a qualitative measure of the effects a given earthquake has on people, structures or objects. Earthquake magnitude is measured on the Richter scale or as moment magnitude, and intensity is described by the Modified Mercalli intensity scale. A related form of measurement is peak ground acceleration, which is a measure of ground-shaking during an earthquake. Peak ground acceleration values are reported in units of gravity ("g"). Structures founded on thick soft soil deposits are more likely to experience more destructive shaking, with higher amplitude and lower frequency, than structures founded on bedrock.



In addition, thick soft soil deposits far distances from earthquake epicenters may result in seismic accelerations significantly greater than expected in bedrock.

As a general rule, the severity of ground shaking increases with proximity to the epicenter of the earthquake. Since the Town has primarily very low to moderate instability, the possibility of ground shaking is low.⁸

Fault Rupture

Ground surface rupture results when the movement along a fault is sufficient to cause a gap or break along the upper edge of the fault zone on the surface. Damage due to surface rupturing is limited to the actual location of the fault line break, unlike damage from ground shaking, which can occur at great distances from the fault.

Soil Lurching

Soil lurching refers to the rolling motion on the ground surface by the passage of seismic surface waves. Effects of this nature are likely to be most severe where the thickness of soft sediments varies appreciably under structures. In its present condition, the potential for soil lurching below the Project area is considered low to moderate due to the existence of potentially compressible soils within the upper few feet of material below existing grades.

Liquefaction

Soil liquefaction describes the behavior of loose saturated cohesionless soils, i.e. loose sands, which go from a solid state to have the consistency of a heavy liquid. Deposits most susceptible to liquefaction are young (Holocene-age, deposited within the last 10,000 years) sands and silts of similar grain size (well-sorted), in beds at least several feet thick, and saturated with water. Such deposits are often found along riverbeds, beaches, dunes, and areas where windblown silt (loess) and sand have accumulated. Liquefaction is characterized by a loss of shear strength in the affected soil layers, thereby causing the soil to behave as a viscous liquid. Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Liquefaction occurs in areas with shallow groundwater and where finer-grained sands make up a significant part of the near surface (less than 30 feet above mean sea level (amsl) soil section. Research and historical data indicate that loose granular soils below a near-surface groundwater table are most susceptible to liquefaction. This effect may be manifested at the ground surface by settlement and, possibly, sand boils where insufficient confining overburden is present over layers. Sand boils occur when water under pressure wells up through a bed of sand. In order for the potential effects of liquefaction to be manifested at the ground surface, the soils generally have to be

⁸ The USDA Forest Service's article "Horseshoe Lake and Vicinity CO₂ Phenomenon" (January 28, 2000) is included in Appendix F of this Draft EIR.

granular, loose to medium-dense and saturated relatively near the ground surface, and must be subjected to ground shaking of a sufficient magnitude and duration.

Based on the character of surface and subsurface soil and depth to groundwater, there appears to be little potential for liquefaction in the Town. Within Mammoth Lakes, areas of alluvium and moraine material with shallow groundwater have the potential for liquefaction. Areas subject to liquefaction because of fine-grained alluvium are in the low areas including Sherwin Meadows, areas to the north and south of the Old Mammoth District, and to a lesser extent, an area of shallow groundwater near the Meridian Boulevard and Minaret Road.

Seiches

A hazard associated with seismicity near large bodies of water in mountainous regions is the generation of seiches, commonly known as sloshing or surge waves. A seiche is a wave that oscillates in lakes, bays, or gulfs from a few minutes to a few hours as a result of seismic or atmospheric disturbances. The potential for seiches as the result of the design level earthquake in a nearby fault is considered non-existent, due to the distance of large open bodies of water from the Project area.

Landslides, Avalanches, and Slope Instabilities

Avalanches can occur as a result of moderate to large earthquakes in Alpine terrain, which can cause rock and snow to move vertically and laterally downslope. These hazards typically affect structures which are located at the base of slopes or within close proximity to the area of flow.

Landslides, earthslips, mudflows, and soil creeps are soil instabilities caused by steep slopes, shallow soil development, excess water, and lack of shear strength in the area. Erosion of supporting material at the foot of constructed slopes is another major cause of sliding. Triggering events for landslides include earthquakes, heavy precipitation, natural erosion, and earthwork/grading. Seismic activity induces some landslides but most slides result from the weight of rain saturated soil and rock exceeding the shear strength of the underlying material. Landslides move under the force of gravity and are affected by the type of earth materials involved, the internal friction of the slide mass, and the slope over which the mass is moving. Landslides are limited primarily to areas with a combination of poorly consolidated material and slopes that exceed 30 percent. Evidence of past landslides in the Project area was not observed either during aerial photographic review or in the field.

Volcanic Hazards

The Mammoth Lakes area is surrounded by territory having shown evidence of volcanic activity during the Pleistocene and Holocene (approximately 1.8 million years ago (ma) through the present). At least nineteen episodes of volcanism during the past approximately 3,000 years have been determined by radiocarbon dating methods. The most significant potential sources of volcanic activity are the Mono-Inyo Craters and the resurgent dome within the Long Valley caldera. Basaltic, rhyolitic, and phreatic

volcanism can be anticipated throughout the region. Basaltic eruptions tend to be least violent while rhyolitic and phreatic eruptions can be very explosive and are associated with large volumes of ejecta that can travel great distances. The Plinian eruption of the Long Valley caldera about 764,000 years ago is one such example where over 500 km³ of ash and debris were sent hundreds of kilometers away.

Explosive eruptions along the Inyo Craters volcanic chain occurred as recently as approximately 550 to 600 years ago. The most recent regional volcanic eruptions occurred between approximately 550 and 800 years ago along the Inyo Craters fracture zone. Historic non-eruptive volcanic activity occurred during the 1980 Mammoth Lakes earthquake sequence and during the 1989 Mammoth Mountain earthquake sequence. Magmatic gas emissions associated with fumarolic activity have been documented on Mammoth Mountain and at Horseshoe Meadows, approximately 4 mi (6.5 km) to the west. Fumarolic activity is also located near Shady Rest Campgrounds located approximately 0.9 mi (1.5 km) to the north and at Casa Diablo geothermal area, which is located approximately 2.5 mi (4 km) to the east.

The Mono Lake-Long Valley region is currently being monitored by several agencies and institutions to detect signs of any magmatic unrest and approaching eruptions. Future eruptions in the Mammoth Lakes are certain to occur like those in the past, but they can be neither predicted nor prevented at this time. Future volcanic eruptions are more likely to occur along the Mono-Inyo Craters volcanic chain than from the resurgent dome or south moat area of the Long Valley caldera. The odds of an eruption occurring in any given year along the chain are one in a few hundred, and the odds that a small eruption at one location on the chain will have a significant impact on any specified place on or near the chain are roughly one in a thousand in any given year. Massive eruptions of the size similar to that of the Long Valley caldera are extremely rare, and current research shows no evidence that an eruption of such catastrophic proportions are brewing beneath the caldera.

A comprehensive daily monitoring program of activity along known faults helps scientists to assess the volcanic hazards in the Long Valley area and to recognize the early signs of possible eruptions. The USGS, in cooperation with the California Office of Emergency Services and local jurisdictions in eastern California, has established procedures to promptly alert the public to a possible eruption.

Lateral Spreading

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material toward an open or “free” face such as an open body of water, channel, or excavation. Generally in soils, this movement is due to failure along a weak plane, and may often be associated with liquefaction. As cracks develop within the weakened material, blocks of soil displace laterally toward the open face. Cracking and lateral movement may gradually propagate away from the face as blocks continue to break free. Lateral spreading can occur within areas having potential for liquefaction.

Expansive Soils

Soil expansion is a phenomenon in which clay and silt soils expand in volume as a result of an increase in moisture content, and shrink in volume upon drying. Expansive soil expands and contracts due to changes in the moisture content of the soil, causing structural problems through differential movement of the structure. The isolated movement of sections of the structure can cause damage to the foundation and framing.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the Project could have a significant environmental impact if it would:

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
 - (ii) Strong seismic ground shaking;
 - (iii) Seismic-related ground failure, including liquefaction; or
 - (iv) Landslides.
- (b) Result in substantial soil erosion or the loss of topsoil;
- (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- (d) Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property; or
- (e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the

potential impacts associated with Threshold (e) listed above was determined to result in no impact. Therefore, only Thresholds (a), (b), (c) and (d) listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes’ General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. All parking would be understructure with the exception of limited hotel guest check-in spaces and off-site on-street retail parking for Site 1 and Site 2. Site 1 and Site 3 would include two levels of understructure parking, while Site 2 would include three levels. Grading and excavation would be required to accommodate the proposed Project and associated understructure parking. The proposed Project would require approximately 156,430 cubic yards of grading of which approximately 7,350 cubic yards would be excavation/embankment and approximately 149,080 cubic yards would be excavation/expansion (14,900 truck trips assuming 10 cubic yards per truck) would be cut and hauled to an off-site location. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses.

Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact GEO-1 Fault Rupture

The Project is not located within either an Earthquake Fault Zone or Alquist-Priolo Hazard Zone and there are no known active, potentially active, or inactive faults that transect the Project’s three sites. The

potential for fault rupture is considered to be low. Therefore, Project impacts related to fault rupture would be *less than significant* and no mitigation measures are required.

Impact GEO-2 Strong Seismic Ground Shaking

The California Division of Mines and Geology (“CDMG”) has included the Town within Seismic Zone III in the Urban Geology Master Plan with an expected modified Mercalli Rating of “IX” or “X” at maximum earthquake intensities. [The “IX” Mercalli rating indicates that heavy damage to unreinforced structures would result and some structures would collapse. The “X” rating indicates that masonry structures would be destroyed, some well built wooden structures would be destroyed, and public facilities would be damaged.]⁹

The Project site is located in a Seismic Zone 4 based on 1997 Uniform Building Code (“UBC”) and 2001 California Building Code (“CBC”). Chapter 15 of the Town Municipal Code requires that all structures within the boundaries of the Town shall be designed to the requirements of Seismic Zone 4 as defined in UBC/CBC. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the UBC and the CBC as well. The UBC/CBC identifies seismic factors that must be considered in structural design. One-third of the design snow load shall be added to the deadload for seismic design. In addition, a building permit is required for retaining walls exceeding four feet in height or retaining walls supporting any surcharge or special loads. Such walls are to be designed by a professional engineer licensed in the state.¹⁰

The State earthquake protection law (California Health and Safety Code 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. While there are no absolute guarantees when considering acts of nature such as earthquakes, the building requirements previously discussed have been designed to reduce the likelihood of damage as a result of ground shaking. Conformance with current UBC/CBC requirements, as well as the Town’s seismic design requirements would most likely reduce the potential for structures on the Project site to sustain damage during an earthquake event. However, Project impacts related to ground shaking would still be considered *significant*. Compliance with the following mitigation measures is required to reduce the impacts resulting from strong ground shaking to a less-than-significant level.

Mitigation Measure GEO-2a Strong Seismic Ground Shaking

Prior to issuance of building permits and grading activities, a design level geotechnical report shall be prepared for each of the Project’s three development sites and all recommendations in the report shall be adhered to. The design-level geotechnical report shall include foundation design criteria as well as earthwork and grading recommendations.

⁹ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007.

¹⁰ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007.

Mitigation Measure GEO-2b Strong Seismic Ground Shaking

Implement all recommendations contained within these site-specific geotechnical reports, including those pertaining to site preparation, excavation, fill placement and compaction; foundations; concrete slabs-on-grade; pavement design; lateral earth pressures and resistance; and surface drainage control.

Mitigation Measure GEO-2c Strong Seismic Ground Shaking

The final grading, drainage, and foundation plans and specifications shall be prepared and/or reviewed and approved by a Registered Geotechnical Engineer and Registered Engineering Geologist. In addition, upon completion of construction activities, the Project Applicant shall provide a final statement indicating whether the work was performed in accordance with Project plans and specifications and with the recommendations of the Registered Geotechnical Engineer and Registered Engineering Geologist.

Impact GEO-3 Liquefaction and Soil Instabilities

As previously stated, liquefaction occurs in areas with shallow groundwater and where finer-grained sands make up a significant part of the near surface (less than 30 feet above mean sea level [“amsl”]) soil section. Research and historical data indicate that loose granular soils below a near-surface groundwater table are most susceptible to liquefaction. Based on the character of surface and subsurface soil and depth to groundwater, there appears to be little potential for liquefaction in the Town. Geotechnical investigation on the Project sites indicates that undocumented fill soils are present and where observed ranged from approximately 2 to 7.5 feet. Additionally, 3.5 feet of colluvium and alluvium, and pyroclastic tephra fall deposits are present at the site. The sandy fill and colluvium, alluvium, and pyroclastic tephra fall deposit materials are generally characterized as loose to medium dense. The generalized static groundwater level is approximately 100 feet below the ground surface with a gradient dipping due east. Groundwater was not encountered on site during the field investigation and is not anticipated to be encountered during site development due to the location of the site with respect to overall drainage. Minor to moderate amounts of seepage may be encountered if the site is graded during the snowmelt runoff period between April and July. The potential for liquefaction to occur at the Project site is considered non-existent, given the lack of a static or permanently perched water table and the dense nature of bearing soils present on site. Because the potential for liquefaction to occur at the site is considered non-existent, the potential for ground failures associated with liquefaction (i.e., lateral spreading, post-liquefaction reconsolidation, and loss of bearing support) is also considered low. Impacts from liquefaction would be ***less than significant*** and no mitigation measures are required.

Impact GEO-4 Landslides and Avalanches

Landslides, earthslips, mudflows, and soil creeps are soil instabilities caused by steep slopes, shallow soil development, excess water, and lack of shear strength in the area. Erosion of supporting material at the foot of constructed slopes is another major cause of sliding. Landslides are limited primarily to areas with a combination of poorly consolidated material and slopes that exceed 30 percent. Evidence of past

landslides was not observed either during aerial photographic review or in the field. The potential for rock falls or snow avalanches to occur on the Project site is considered low, given the proximity of the site to a relatively steep slope area located south of the Project site. No evidence of past landslides has been observed. Therefore, Project impacts related to landslides and avalanches would be *less than significant* and no mitigation measures are required.

Impact GEO-5 Soil Erosion/Loss of Topsoil

The Project site would require grading and earthwork and would be subject to soil erosion and loss of topsoil. Erosion and loss of topsoil is possible surrounding the structures if left unprotected during the snowmelt season. Without proper implementation of erosion control measures during construction and operation of the Project, the sites could sustain soil erosion and loss of topsoil. This would be considered a *significant* impact. However, the following mitigation measures would reduce this impact to a less-than-significant level.

Mitigation Measure GEO-5a Soil Erosion/Loss of Topsoil

The following measures shall be implemented to prevent soil erosion and loss of topsoil:

- a. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared with the grading plans to fulfill regulatory requirements.
- b. Permanent erosion control measures shall be placed on all graded slopes. No graded areas shall be left unstabilized between October 15th and April 15th.
- c. Permanent erosion control measures for construction identified in the Project's Storm Water Pollution Prevention Plan ("SWPPP") per the requirements of the California State Water Resources Control Board ("SWRCB") adopted in accordance with the General Construction Activity Storm Water Permit ("General Permit") shall be implemented.
- d. Finish grading for all building areas shall allow for all drainage water from the building area to drain away from building foundations (two percent minimum grade on soil or sod for a distance of five feet). Ponding of water shall not be permitted.
- e. The required implementation of the Best Management Practices ("BMPs") identified in the Project's SWPPP would ensure that Project construction activities within the Project area would not cause substantial erosion on- or off-site. Additionally, for post construction, erosion control measures designed to minimize soil loss from exposed areas of the Project's three sites shall be determined in consultation with the Town's Department of Public Works.

Impact GEO-6 Volcanic Activity

A volcanic eruption could occur somewhere along Mono-Inyo Craters volcanic chain producing pyroclastic flow and surges, as well as volcanic ash and pumice fallout, which could significantly impact the subject site. The odds, however, of such an eruption are roughly one in a thousand in a given year. Although risk is present throughout the Town and surrounding areas, Project impacts related to volcanic activity would be ***significant***.

Mitigation Measure GEO-6a Volcanic Activity

The Project Applicant shall prepare an emergency evacuation plan in consultation with the Town in order to provide for the orderly evacuation of the Project site in case the potential for volcanic hazards increases and residents need to vacate the Project site.

Impact GEO-7 Expansive Soils

As noted, soils encountered at the Project site generally consisted of loose to dense, silty, very fine to coarse-grained sands, with abundant cobble clasts and boulders to approximately 48-inches diameter, which are not considered expansive soils. No expansive soils have been mapped or encountered in the Town.¹¹ Therefore, Project impacts related to expansive soils would be ***less than significant*** and no mitigation measures are required.

Impact GEO-8 Carbon Dioxide

As previously noted, high concentrations of carbon dioxide are located within isolated areas of the Town, prominently Horseshoe Lake. Carbon dioxide poses a health risk when collected at high concentrations in lower parts of depressions and enclosures. However, once the carbon dioxide is able to disperse within the atmosphere, there is no longer a health risk. The Project site is not located in an area associated with high levels of carbon dioxide. Therefore, impacts would be ***less than significant*** and no mitigation measures are required.

CUMULATIVE IMPACTS***Impact GEO-9 Cumulative Impacts***

Geotechnical impacts related to future development in the Town as described in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would involve hazards associated with site-specific soil conditions, erosion, volcanic activity, and ground-shaking during earthquakes. The related projects list represents the broadest range of reasonable foreseeable development, including a

¹¹ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007.

number of projects that have not yet been approved. The impacts on each related project site would be specific to that site and its users and would not be common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each related project site would be subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geology and soil impacts would be *less than significant* and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the mitigation measures listed above and compliance with applicable regulations would reduce all Project impacts related to geology and soils to a *less-than-significant* level.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

G. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section considers potential risks associated with hazards and hazardous materials resulting from the proposed redevelopment of the Mammoth Crossing Project (“Project”) area. This analysis considers potential risks to residents and visitors of Mammoth Lakes from on-site and off-site sources of hazards and hazardous materials.

Hazardous materials can threaten human health and/or the environment through routine emissions and/or accidental releases. Hazardous materials include materials that are toxic, corrosive, flammable, reactive, irritating, and strongly sensitizing. According to the State of California, a hazardous material is defined as:

"A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either: 1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed."

A detailed analysis of hazards associated with geology and flooding are located in Section IV.F, Geology and Soils, and Section IV.H, Hydrology and Water Quality, of this Draft EIR, respectively.

METHODOLOGY

A Phase I Environmental Site Assessment has not been prepared for the Project area and this analysis is a conservative approach to include a discussion on potential environmental hazards and hazard mitigation requirements that may be associated with the proposed Project. Specifically, this section is an assessment of potential regulatory compliance issues associated with demolition of existing facilities on the Project’s three sites.

ENVIRONMENTAL SETTING

Project Area

The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection in the northwestern part of the Town of Mammoth Lakes (“Town”) in Mono County. The Project area has varying topography interspersed with alpine trees, and is currently occupied with several buildings and paved surface area. Following is a description of existing uses on each of the sites that comprise the Project area.

Site 1

Site 1 is located on the northwest corner of the Main Street-Lake Mary Road/Minaret Road intersection. Site 1 is currently developed with: the Whiskey Creek Restaurant, which was constructed in 1981; several buildings, including a commercial office building, which was constructed in 1980; and paved surface parking areas.

Site 2

Site 2 is located on the southwest corner of the Main Street-Lake Mary Road/Minaret Road intersection. Site 2 is currently developed with: the Laurel Lodge/North Village Inn, which was initially constructed in 1958 and added onto circa the 1970's; the vacant St. Joseph's Church/Mammoth Cable Television, which was constructed in the 1950's and relocated to its current location in the 1970's; the Sartori Cabin/Mammoth Cable Television, initially built in the 1920's and relocated to its current location in the 1970's; some office/retail and storage structures; and surface parking areas.

Site 3

Site 3 is located on the southeast corner of the Main Street-Lake Mary Road/Minaret Road intersection. Site 3 is currently developed with: the White Stag Inn, which was constructed circa the 1970's; the Ullr Lodge, which was initially constructed in 1963 with additions in 1967, 1969, and 1979; a series of small accessory structures; and surface parking areas.

Site 4

Site 4, located south of site 3 along Minaret Road, proposes no new development as part of this Project.

Existing Surrounding Properties

The Project area proposed for development includes three sites (i.e., Site 1, Site 2, and Site 3). As mentioned above, Site 4 proposes no new development as part of this Project. (refer to Figure III-2 in Section III, Project Description, of this Draft EIR)

Site 1 is bounded to the north by the Fireside Condominiums, to the east by Minaret Road, to the south by Lake Mary Road and to the west by Canyon Boulevard. Site 1 is fully bounded by Specific Plan land use zoning.

Site 2 is bounded to the north by Lake Mary Road, to the east by Minaret Road, to the south by the Sierra Star Golf Course and to the south and west by the Hidden Valley Condominiums. Site 2 is bounded by Specific Plan land uses to the north, east and south, and by Residential Multi-Family 2 (RMF-2) land use zoning to the south and west.

Site 3 is bounded by Main Street to the north, the Holiday Haus Inn and the Sierra Star Golf Course to the east, Site 4 and the Sierra Star Golf Course to the south and Minaret Road to the west. Site 3 is bounded by Specific Plan land use zoning to the north and west, and Commercial (Lodging) and Resort (R) zoning to the east, and Resort (R) zoning to the south. (refer to Figure II-5, and Figure II-9 through Figure II-10).

Site 4 is bounded by Site 3 to the north, the Sierra Star Golf Course to the east, residential development to the south and Minaret Road to the west. Site 4 is bounded by Specific Plan land use zoning to the north, west and south, and by Resort (R) zoning to the east.

There are no industrial activities within the properties surrounding the Project site.

Sensitive Receptors

Appendix G to the State *CEQA Guidelines* considers a significant impact to occur if a Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Furthermore, the following land uses are generally considered to be sensitive receptors with respect to air quality impacts: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; child care centers; and athletic facilities.¹ For the purpose of this analysis, sensitive receptors with respect to potential hazardous materials exposure would include existing residential uses located: along both sides of Minaret Road adjacent to the Project area; along both sides of Canyon Boulevard adjacent to the Project area; along both sides of Lake Mary Road adjacent to the Project area; along both sides of Main Street adjacent to the Project area; and on-site residential uses proposed as part of the Project.

Topography

The Project area is located in the western portion of the Long Valley caldera between the western margin of the caldera's resurgent dome and the eastern flank of the Sierra Nevada. The Project area is located entirely on a debris-avalanche deposit formed by a rock avalanche off the northeast face of Lincoln Peak. Soils beneath the Town are typically gravelly loams with low water capacity generally developed on glacial outwash south of Mary Lake Road and on glacial moraines to the north of Mary Lake Road. Soils are sensitive to disturbances by development and have a moderate to high erosion potential, depending on the steepness of the slope. The Project area has varying topography. A more detailed description of the topographic setting is provided in Section IV.F, Geology and Soils, of this Draft EIR.

¹ *South Coast Air Quality Management District, Air Quality Analysis Guidance Handbook, July 1999, Figure 4-2.*

Asbestos-Containing Materials

Asbestos-containing materials (“ACM”) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. ACM is generally defined as either friable or non-friable. Friable ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to powder by hand pressure. Non-friable ACM is defined as any material containing one percent or less asbestos. Non-friable ACM cannot be crumpled, pulverized, or reduced to powder by hand pressure. When left intact and undisturbed, ACM does not pose a health risk to building occupants. Potential for human exposure occurs when ACM becomes damaged to the extent that asbestos fibers become airborne and are inhaled. Inhalation of asbestos airborne fibers can lead to various health problems, the most serious of which includes lung disease. Asbestos abatement measures will be required to ensure the health and safety of construction workers and those in the surrounding community.

The principal federal government agencies regulating asbestos are the Occupational Safety and Health Administration (“OSHA”) and the United States Environmental Protection Agency (“U.S. EPA”). The age of a building is directly related to its potential for containing elevated levels of ACM. Generally, all untested materials are presumed to contain asbestos in buildings constructed prior to 1981. The U.S. EPA recommends a proactive in-place management program be implemented wherever undamaged ACM are found in a building. The U.S. EPA recommends that damaged ACM be removed, repaired, encapsulated, or enclosed, and that all ACM are removed prior to any demolition or major renovation activities.

As previously discussed, all three sites contain existing structures that will be demolished or removed as part of the proposed Project. The age of the existing structures is known as stated above and these buildings have the potential to contain ACMs, and a comprehensive asbestos survey would be recommended prior to any demolition, renovation or relocation activities that may be undertaken in association with future development under the Project. Demolition of the existing structures on the Project site must be conducted in accordance with all applicable regulations concerning the removal of ACMs.

Lead-Based Paint

Lead-based paint (“LBP”), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACM, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

As discussed above, all three sites contain existing structures that will be demolished or removed as part of the proposed Project. As previously stated, the age of the existing structures is known and these buildings have the potential to contain LBP, and a comprehensive LBP survey would be recommended prior to any demolition, renovation or relocation activities that may be undertaken in association with future development under the Project. Demolition of the existing structures on the Project site must be conducted in accordance with all applicable regulations concerning the removal of LBPs. Lead-based paint abatement measures will be required to ensure the health and safety of construction workers and those in the surrounding community.

Other Hazards

A Phase I Environmental Site Assessment has not been prepared for the Project area in the past five years and further investigation may be required to identify potential environmental liabilities which may be present at the Project area. It is presently unknown if any underground storage tanks or significant spills or leaks of hazardous material have occurred in the Project area in the past. However it is unlikely given the past uses of the Project's three sites. Because the extent of potential past contamination of soils is not yet fully known, the impacts related to the exposure of contaminants to construction workers, nearby businesses and residents during soil grading and excavation activities is unknown.

Wildland Fires

The Town of Mammoth Lakes' ("Town") location relative to National Forest lands, and the large areas of urban interface with forest vegetation, increase the susceptibility of the Town to wildland fire. The combination of highly flammable fuel, long dry summers, and steep slopes create the potential for wildland fires in the Town's planning area. Uncertainty of water supply, transient visitor use, severe winter weather, and seasonal road conditions that restrict access to certain areas also contribute to unique fire hazard problems in the area. The planning area is rated as having a very high fire potential and the entire Town is designated as a wildland fire hazard zone. The Town of Mammoth Lakes, the Mammoth Lakes Fire Protection District, the United States Forest Service (i.e., Inyo National Forest), and Mono County continually and actively strive to minimize wildland fire risks. Over the next 1-4 years, the aforementioned participating agencies are coordinating and developing a comprehensive Fire Hazards Response Plan for the urban-wildland interface.

The Project site is near the center of Town in an urbanized area where residents are intermixed with wildlands. The Project site contains existing forest and all three Project sites (Site 1, Site 2, and Site 3) would preserve existing trees to the maximum extent possible. In addition, there are adjacent undeveloped/forested parcels to the south of Site 2. The Project site is not in the high-severity portion of the Town's designated wildland fire hazard zone, but could potentially expose people or structures to a significant risk of loss, injury or death involving wildland fires and impacts could be potentially significant.

The Project's landscape site work would be consistent with traditional approaches for the region, and would address current needs. Regulations of Town Municipal Code Chapter 17.38 "Water-Efficient Landscape" require water efficiency and conservation, including provisions for fire prevention measures in areas that are fire prone. Regulations of Chapter 17.16.050 "Grading and Clearing" require environmental considerations, including preservation of existing trees and vegetation to the maximum extent possible. The Project Applicant is required to submit, prior to the issuance of building permits by the Town, a Vegetative Hazard Management Plan for approval by the Mammoth Lakes Fire Protection District. In addition, prior to the issuance of a use permit, the MLFPD requires that new development prepare a Wildland Urban Interface Hazards Management Plan.

REGULATORY SETTING

Federal/State and Regional/Local

A myriad of laws and regulations at the federal, state, and local levels affect the management of hazardous materials. The following section describes the regulatory framework for hazardous materials and worker health and safety requirements.

Hazardous Materials

In California, the U.S. Environmental Protection Agency ("U.S. EPA") has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency ("California EPA"). In Mono County, the Environmental Health Department has the responsibility for the County's Certified Unified Program Agency ("CUPA") program (California Health and Safety Code Chapter 6.11), which regulates programs for Hazardous Waste, Underground Storage Tanks ("UST"), Aboveground Storage Tanks ("AST"), Hazardous Materials Disclosure ("HMD"), Business Plan, and the California Accidental Release Program ("California ARP").

Additionally the Mammoth Lakes Fire Protection District is the first responder to spills or accidental releases of hazardous materials² and is responsible for assisting with implementation of the Hazardous Materials Release Response Plan Program as part of the Mono County CUPA.³

Oversight for investigation and remediation of sites affected by hazardous materials releases can be performed by state agencies, such as the California EPA Department of Toxic Substances Control ("DTSC") or the State Water Resource Control Board.

² CAJA Staff phone correspondence with Mammoth Lakes Fire Protection District, Bob Rooks, Division Chief, March 10, 2008.

³ CAJA Staff phone correspondence with Mono County Environmental Health Department, Lewis Molina, Environmental Health Specialist, March 10, 2008.

In California, regional agencies are responsible for programs regulating emissions to the air, surface water, and groundwater. At the Project site, the Great Basin Unified Air Pollution Control District (“Air District”) has oversight over air emissions, and the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) has jurisdiction over Mono County, and regulates discharges and releases to surface and groundwater.

Worker Health and Safety Regulations

Worker health and safety in California is regulated by the California Department of Industrial Relations, Division of Occupational Safety and Health (“California OSHA”). California OSHA conducts on-site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

Injury and Illness Prevention Plan

The California General Industry Safety Order requires that all employers in California shall prepare and implement an Injury and Illness Prevention Plan, which should contain a code of safe practice for each job category, methods for informing workers of hazards, and procedures for correcting identified hazards.

Emergency Action Plan

The California General Industry Safety Order requires that all employers in California prepare and implement an Emergency Action Plan. The Emergency Action Plan designates employee responsibilities, evacuation procedures and routes, alarm systems, and training procedures.

Fire Prevention Plan

The California General Industry Safety Order requires that all employers in California prepare and implement a Fire Prevention Plan. The Fire Prevention Plan specifies areas of potential hazard, persons responsible for maintenance of fire prevention equipment or systems, fire prevention housekeeping procedures, and fire hazard training procedures.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the Project could have a significant environmental impact if it would:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.
- (f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the Project would have no impact with respect to Thresholds (a), (c), (d), (e), (f), and (g), listed above. As such, only further analysis of Threshold (b) and (h) is required to be provided below.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square

feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project's fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact HAZ-1 Upset and Accidental Release of Hazardous Materials

Hazardous materials and risk of upset conditions are largely site-specific. The Project would require demolition, renovation or relocation of existing structures and removal of paved surface areas on each of the three sites. Given the age of the buildings, there exists the potential for existing construction materials to contain either Asbestos-Containing Materials ("ACM") or Lead-Based Paint ("LBP"). Generally, all untested materials are presumed to contain asbestos in buildings constructed prior to 1981. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual. The existing buildings in the Project area have the potential to contain ACMs and/or LBPs, demolition impacts involving these hazardous substances are potential significant. Comprehensive ACM and LBP surveys would be recommended prior to any demolition or removal activities that may be undertaken in association with future development under the Project. Demolition of the existing structures on the Project site must be conducted in accordance with all applicable regulations concerning the removal of ACMs and LBPs.

In the event that potential environmental liabilities (e.g., contaminated soils, leaking underground tanks) in the Project area are identified, further investigation would be required before soil grading and excavation could occur.

Because the Project could potentially result in temporary, *significant* impacts during demolition, grading and the redevelopment of the Project area, the following mitigation measures are required to reduce these impacts to a less-than-significant level.

Mitigation Measure HAZ-1a Upset and Accidental Release of Hazardous Materials

The Project Applicant shall comply with California OSHA Construction Safety Orders, California Code of Regulations, Title 8, Section 1532.1 and with the California Health and Safety Code, Division 20, Chapter 6.5 for the evaluation, handling and transport of materials containing hazardous substances.

Should the Town require it, prior to demolition of on-site buildings and grading activities, a Phase I Environmental Site Assessment shall be conducted and all recommendations in the assessment shall be adhered to. It is anticipated that this further assessment/investigation will determine if any additional potential environmental liabilities are present in the Project area, and the assessment recommendations will assure a reduction of potential impacts to a less-than-significant level.

Mitigation Measure HAZ-1b Upset and Accidental Release of Hazardous Materials-ACMs

A licensed asbestos abatement consultant shall be retained to conduct a pre-construction assessment for asbestos and asbestos containing materials. Prior to the issuance of demolition or building relocation permits, the Project Applicant shall provide a letter to the Community Development Department from the qualified asbestos abatement consultant that no ACMs are present in on-site buildings. If ACMs are found to be present, they will need to be abated in compliance with all State and federal rules and regulations (including, but not limited to California Health and Safety Code, Division 20, Chapter 6.5), consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (“OSHA”), Chapter 29 Code of Federal Regulations (“CFR”), prior to demolition of any buildings in the Project area. The Project Applicant shall be required to comply with all applicable State and federal policies and procedures for removal of any ACM containing materials determined to be present within any structures on the Project area. Adherence to procedures outlined in the laws will assure that there will be a less-than-significant impact from asbestos due to the demolition or removal of buildings or structures.

Mitigation Measure HAZ-1c Upset and Accidental Release of Hazardous Materials-LBPs

A licensed lead-based paint abatement consultant shall be retained to conduct a pre-construction assessment of lead based paint and lead-based paint containing materials. Prior to the issuance of the demolition or building removal permits, the Project Applicant shall provide a letter to the Community Development Department from a qualified lead-based paint abatement consultant that no lead paint is present in on-site buildings. If lead-based paint is found to be present on buildings to be demolished or removed, it shall be abated in compliance with applicable State and federal rules and regulations governing lead paint abatement, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (“OSHA”), Chapter 29 Code of Federal Regulations, prior to demolition of any buildings in the Project area. The Project Applicant shall be required to comply with all applicable State and federal policies and procedures for removal of any LBP containing materials determined to be present within any structures on the Project site. Adherence to procedures outlined in the laws will assure that there will be a less-than-significant impact from lead-based paint due to the demolition or removal of buildings or structures.

Impact HAZ-2 Wildland Fires

As mentioned above, the Project site is near the center of Town in an urbanized area where residents are intermixed with wildlands. The Project site contains existing forest and all three Project sites (Site 1, Site 2, and Site 3) would preserve existing trees to the maximum extent possible. In addition, there are adjacent undeveloped/forested parcels to the south of Site 2.

Site 1 landscaping would preserve the majority of existing trees along the northern border to provide a forested transition between the proposed new development and the adjacent Fireside Condominiums. In addition, the majority of the existing trees throughout the proposed public plaza area and along the Lake Mary Road border would also be preserved.

Site 2 landscaping would preserve the majority of the existing trees along the southern border, preserving the forested transition to the adjacent Hidden Valley Condominiums and Sierra Star Golf Course.

Site 3 landscaping would preserve the majority of trees along the western border to preserve the forested transition between adjacent Holiday Haus Inn and the Sierra Star Golf Course.

New water-efficient landscaping would be provided on all three sites throughout the pedestrian transition areas and public plazas.

Physical augmentation of the Project sites would include removal of some of the existing vegetation and trees, and development of manufactured slopes, building pads, and on-site roadways. Supplemental fire lanes would be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials so as to be adequate for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle traffic. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in locations accessible to fire equipment. The Project would incorporate a number of fire safety features in accordance with applicable Mammoth Lakes Fire Protection District (“MLFPD”) fire-safety code and Town regulations for construction, access, fire flows, and fire hydrants. These fire-safety features include, but are not limited to, ample roads, adequate building spacing, use of fire resistive building materials, and adequate vegetative clearance around structures. For a more detailed discussion of Project design in relation to fire safety, refer to Section IV.L, Public Services-Fire Protection Services, of this Draft EIR.

The Project would be designed and developed in compliance with all applicable fire safety Town Municipal Codes and with all regional, State and federal requirements and regulations. In addition, the Project would prepare a Vegetative Hazard Management Plan and Wildland Urban Interface Hazards Management Plan both for approval by the MLFPD. Therefore potential impacts from wildland fires would be ***less than significant*** and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact HAZ-3 Cumulative Impacts

Development of the Project in combination with the of the 40 related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR has the potential to increase the risk for accidental release of hazardous materials. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. Each of the 40 related projects would require evaluation for potential threats to public safety, including those associated with transport/use/disposal of hazardous materials, accidental release of hazardous materials into the environment, hazards to sensitive receptors (including schools), listed hazardous material sites, aircraft-related hazards, emergency response, and wildland fire hazards. Because hazardous materials and risk of upset conditions are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Furthermore, implementation of Mitigation Measures HAZ-1a, HAZ-1b and HAZ-1c recommended above would ensure that the Project's impacts associated with hazards and hazardous materials would remain less than significant and would not contribute to a cumulative impact to hazards and hazardous materials. Further, each related project would be required to follow local, State, and federal laws regarding hazardous materials and other hazards, including wildland fires. Therefore, with full compliance with local, State, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be *less than significant* and no additional mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of mitigation measures listed above the Project would have a *less-than-significant* impact with respect to hazards and hazardous materials.

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. HYDROLOGY AND WATER QUALITY

INTRODUCTION

This section of the Draft EIR provides a description of the surface water and groundwater resources on the Mammoth Crossing Project (“Project”) site, information on regulations that serve to protect these resources, an assessment of the potential impacts of the Project on these resources, and recommended measures to mitigate potentially significant impacts on these resources. Various technical reports were reviewed and prepared to analyze the potential surface water and groundwater hydrology and water quality impacts associated with the Project. These technical reports are summarized in the section below and are included in Appendix G of this Draft EIR. Additional technical reports prepared to analyze the biological resources at the Project site were also utilized in the preparation of this section and are included in Appendix D of this Draft EIR.

BACKGROUND AND METHODS

The information and analysis in this section (except where footnoted otherwise or described below) is based on the *Mammoth Crossing, Mammoth Lakes, California, Preliminary Drainage Study, December 2007* prepared by Triad/Holmes Associates, herein referred to as Preliminary Drainage Study.

This *Preliminary Drainage Study*, which is incorporated herein by this reference, is included as Appendix G to this Draft EIR. In addition, the following reports prepared for the evaluation of biological resources at the Project site were utilized in the preparation of this section and are included in Appendix D to this Draft EIR:

In addition, *The Town of Mammoth Lakes 2005 Storm Drain Master Plan Update, May 26, 2005*, herein referred to as 2005 Storm Drain Master Plan, was utilized in the analysis of hydrologic and water quality impacts associated with the Project.

ENVIRONMENTAL SETTING

The Project site is located in the Town of Mammoth Lakes (“Town”), Mono County, California. The Town of Mammoth Lakes is located on the eastern slopes of the Sierra Nevada at an elevation of approximately 7,900 feet above sea level within Section 34, Township 3 South, Range 27 East Mt. Diablo Base (“MDB”) and Meridian (“M”). The Town is located approximately 168 miles south of Reno, Nevada, and approximately 310 miles north of Los Angeles, California. Neighboring communities of the Town include June Lake to the northwest, Benton to the east, and Crowley Lake to the southeast (refer to Figure II-1 and Figure II-2). Regional access is provided by U.S. Highway 395 and California State Route 203. Major arterials which provide access to the site include Minaret Road to the north and south, Main Street to the north, Joaquin Road to the east, Meridian Boulevard to the south, and Lake Mary Road to the west.

Surface Hydrology

Regional

The Town is located within the 71-square mile Mammoth Basin, a drainage area on the eastern slope of the Sierra Nevada that is tributary to the Great Basin, a large hydrologic/geographic region encompassing portions of California, Nevada, Utah, Idaho, and Oregon. Drainage to the Great Basin does not reach the ocean but instead evaporates or percolates to groundwater in a series of “sinks” or lakes.

The Mammoth Basin delivers surface and groundwater to Mammoth Creek/Hot Creek, which is tributary to the Owens River. Mammoth Creek and Hot Creek are different names for the same stream with the division in nomenclature occurring where U.S. Highway 395 crosses the stream to the southeast of Town. The Owens River ultimately terminates at Owens Lake, a dry “sink”/evaporation basin located at the southern end of the Owens Valley, approximately 125 miles southeast of the Town. The watershed boundaries of the Mammoth Basin consist of the Mammoth Crest divide on the Sierra Nevada crest to the west and south, the Dry Creek drainage divide on the north, and the Convict Creek drainage divide on the east. The general trend of the Mammoth Basin is to the southeast, with elevations ranging from approximately 11,600 feet above sea level (“asl”) on the Mammoth Crest to the southwest of Town to approximately 7,000 feet asl at the confluence of Hot Creek and the Owens River to the southeast of Town. The total flow length of the Mammoth Creek/Hot Creek drainage is approximately 18 miles.¹

The Mammoth Basin includes a system of lakes and interconnecting surface streams in its upper elevations, all of which are eventually tributary either by surface flow or underground flow to Mammoth Creek. Within or proximate to the Town, a total of five sub-watersheds are tributary to Mammoth Creek: the Lake Mary Basin, Old Mammoth, Murphy Gulch, Sherwin Creek, and Casa Diablo.²

Local

The Project site is located within the Murphy Gulch sub-watershed within the Town. This sub-watershed covers approximately 5,120 acres, of which the proposed Mammoth Crossing Project would encompass approximately 11 acres, with approximately nine acres being proposed for new development. The Project area is generally located along the south-central boundary of the Murphy Gulch sub-watershed.

Presently, Sites 1, 2, and 3 of the Project are developed. Due to the existing development of much of the proposed Project area, several stormwater drainage improvements and infrastructure already exist throughout the Project site. This drainage infrastructure is currently serving existing development within the proposed Project area. Existing facilities in the vicinity of the Project include a storm drain system along Lake Mary Road, Main Street, and Canyon Boulevard. Site 1 is tributary to an existing storm drain inlet at the southwest corner of the site. An existing natural swale is located along the south side of Main

¹ Town of Mammoth Lakes 2005 Storm Drain Master Plan Update, May 26, 2005.

² *Ibid.*

Street, within the Site 3 property. Another natural swale is located on the west side of Minaret Road, within the Site 2 property. Existing stormwater infrastructure within the Project area is tributary to the Town's storm drain system.

Drainage boundaries have been defined based on the existing and proposed conditions. Property lines do not play a major role in establishing the drainage boundaries. Drainage areas described in this discussion are shown in Appendix A of the *Preliminary Drainage Study* located in Appendix G of this Draft EIR. Drainage area A1 encompasses the entire Site 1. Drainage area 2B is based on the existing conditions of Site 2, with an additional area, Area 2A, added due to the proposed development on Site 2. Site 3 contains five drainage areas: 3A, 3B, 3C, 3D, and 3E.

Off-Site Drainage

Site 1 is bounded by Canyon Boulevard on the west, Project 80/50³ and Fireside Condominiums on the north, Main Street on the east, and Lake Mary Road on the south. Due to the topography of the area, the direction of the runoff flow is from northwest to southeast and the only possible drainage entrance for Site 1 is located along the west and north boundary lines. Canyon Boulevard collects and conveys runoff from the west via curb and gutter to an existing storm drain system, Project 8050 has its own drainage collection system which outlets to existing storm drain along Main Street.

The only possible offsite drainage entrance for Site 2 is along the south and southwest side of Lake Mary Road. As part of Lake Mary Bike Path project, future curb and gutter are proposed along Lake Mary Road, which will prevent offsite drainage entering Site 2. Site 3 is bounded by Main Street on the north and Minaret Road on the west. There is a small area (0.29 acres) between Main Street and Site 3, Area 3A, which is tributary to the site. An existing curb, inlet, slotted drain, and natural channel along the south side of Minaret Road prevent offsite runoff from the northwest to enter Site 3. Minaret Road slopes towards the south conveying runoff in the street.

Groundwater Hydrology

The Mammoth Basin is located within the Long Valley Groundwater Basin. Groundwater hydrology within the Mammoth Basin generally mimics surface water hydrology, with the local and regional groundwater table sloping generally to the southeast and contributing to baseflow in the Mammoth Creek/Hot Creek system. Perched groundwater exists sporadically at shallower depths than the regional water table and is dependent upon local soil conditions. Recharge of regional groundwater is dependent upon annual precipitation, which averages approximately 25 inches within the Town itself but ranges considerably across the surface watershed (from approximately 80 inches near the Sierra Nevada crest to less than 10 inches near the watershed's outlet to the Owens River).

³ *Project 80/50 is a proposed 23 unit multi-family residential condominium development. According to the Town, the first two phases of 80/50 are built; the third phase is partially constructed but on hold.*

Throughout the Mammoth Basin, the bulk of precipitation occurs during the winter months and falls in the form of snow. As a result, groundwater recharge rates (as well as surface water streamflows) are greatest during the annual snowmelt which generally occurs between April and June, depending on the size of the snowpack. Groundwater is a key source of water supply for the Town (see Section IV.N, Utilities, of this Draft EIR for more detail). The portions of the Project site that are not currently covered with impervious surfaces (e.g., paving, structures, and roadways) provide opportunities for groundwater recharge.

The generalized static groundwater level is approximately 100-feet below the ground surface with a gradient dipping due east. In addition, the Mammoth Community Water District/USGS production water Well No. 17, located in proximity to the Project site, has a mean static water depth of 375-feet below the ground surface.

Jurisdictional Resources

No waters of the U.S. or waters of the State were observed on the Project site, including wetlands, streams, ponds, or lakes. Soils are granular, typical of SCS Type “B” based on Figure 1-7 in the *1984 Storm Drainage and Erosion Control Design Manual*. Native vegetation in undeveloped areas includes pine trees and brush.

Federal and State Water Quality Programs

NPDES Permits and Related Requirements

The 1972 amendments to the Federal Water Pollution Control Act, later referred to as the Clean Water Act (“CWA”), prohibit the discharge of any pollutant to navigable waters of the United States from a point source unless the discharge is authorized by a National Pollution Discharge Elimination System (“NPDES”) Permit. While the original CWA focused on point source discharges (defined pipes and outfalls), stormwater discharges were added to the scope of the law by Congress in 1987. The United States Environmental Protection Agency (“U.S. EPA”) adopted final regulations that established Phase I stormwater discharge control requirements for the NPDES program in 1990. These regulations required large municipalities and specific industrial sites to obtain stormwater discharge permits under the NPDES program. In addition, these regulations required that stormwater discharge permits be issued to large construction activities consisting of five acres or more of land.

In 2003, the Phase II NPDES program requirements took effect, regulating nonpoint source discharges from all construction sites one acre or more in size and expanding the permit requirements to smaller municipalities. In California, the NPDES program is administered by the State Water Resources Control Board (“SWRCB”) through the nine Regional Water Control Boards (“RWQCBs”). Because the Town is a small community, it falls below the threshold for the Phase II NPDES program’s municipal stormwater regulations. Therefore, the Town’s municipal storm drainage system is not required to be covered by an

NPDES permit. However, the construction activities component of the Phase II NPDES program does apply to construction sites that disturb one acre or more within the Town.

In 1992, the California SWRCB adopted the General Construction Activity Storm Water Permit (“General Permit”) which is “...required for all stormwater discharges associated with construction activity where clearing, grading, and excavation results in a land disturbance of 5 or more acres.” However, by Modification of Water Quality Order 99-08-DWQ (approved by Motion on December 2, 2002) and consistent with the Phase II NPDES program for stormwater, the SWRCB lowered the threshold acreage of soil disturbance requiring permit coverage from five acres to one acre. Since most development projected to occur within the proposed Project area would fall within these criteria, permits must be obtained from the SWRCB prior to start of construction. In order to be covered under the General Permit, the project applicant for each individual project to be developed within the project area must submit a Notice of Intent (“NOI”) to the SWRCB. For coordinated development proposals, a single NOI can be submitted.

The General Permit requires all owners of land where construction activities occur (i.e., dischargers) to:

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation;
- Develop and implement a Stormwater Pollution Prevention Plan (“SWPPP”); and
- Perform inspections of stormwater pollution prevention measures (control practices).

The General Permit authorizes the discharge of stormwater associated with construction activity from construction sites. However, it prohibits the discharge of materials other than stormwater and all discharges which contain hazardous substances in excess of reportable quantities established at Title 40 Code of Federal Regulations Sections 117.3 or 302.4 unless a separate NPDES permit has been issued to regulate those discharges.

The General Permit requires development and implementation of a SWPPP, emphasizing Best Management Practices (“BMPs”), which are defined as “schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States.” The SWPPP has two major objectives:

- To help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and
- To describe and ensure the implementation of practices to reduce sediment and other pollutants in stormwater discharges.

In addition, dischargers are required to conduct inspections before and after storm events and to annually certify that they are in compliance with the General Permit.

Water Quality Standards and Total Maximum Daily Loads

In addition, the CWA requires states to adopt water quality standards for water bodies and to have those standards approved by the U.S. EPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, and fishing) and water quality criteria necessary to support those uses. Water quality criteria are expressed either in the form of set numeric concentrations or levels of constituents, such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements that describe the quality of water necessary to support a particular beneficial use. In 2000, the California Environmental Protection Agency (“California EPA”) established numeric water quality criteria for certain toxic constituents in California receiving waters with human health or aquatic life designated uses in the form of the California Toxics Rule (“CTR”).⁴

The Lahontan Regional Water Control Board (“Lahontan RWQCB”) adopted the Water Quality Control Plan (“Basin Plan”) for the Lahontan Region in 1994. The Basin Plan has since been amended numerous times. The Basin Plan designates the beneficial uses of receiving waters to which the Project site ultimately discharges via the Town’s storm drain system, and specifies both narrative and numerical water quality objectives for these receiving waters. Water quality objectives, as defined by the California Water Code Section 13050(h), are the “limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses or the prevention of nuisance within a specific area.” Because these standards are applicable to receiving waters, they do not apply directly to stormwater runoff from the Project site. Table IV.H-1, Designated Beneficial Uses of Mammoth Creek, lists the designated beneficial uses for Mammoth Creek and its tributary streams as described in the Basin Plan.

Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters. Impaired waters are those particular water-bodies whose beneficial uses are being compromised by poor water quality. The law requires that these jurisdictions establish priority rankings for these impaired waters and develop Total Maximum Daily Loads (“TMDLs”) for the impairing pollutant(s) affecting each impaired water-body. A TMDL is an estimate of the total load of each pollutant that a water-body can receive from point, nonpoint, and natural sources without exceeding water quality standards. Once established, a TMDL allocates pollutant loadings among current and future point and nonpoint pollutant sources discharging to the water-body.

The Project site discharges through the Town’s storm drain system into Mammoth Creek. Mammoth Creek identified in the 2002 Section 303(d) list of water quality impaired stream segments as impaired by metals. However, the listing is qualified with a statement that additional water quality monitoring is needed in order to determine the extent of the impairment and the need for a TMDL. Thus, the priority for TMDL is assigned as “low”. Potential sources of potential elevated metals concentrations are identified as natural sources, urban runoff, and nonpoint sources.

⁴ Title 40 Code of Federal Regulations Section 131.38.

**Table IV.H-1
Designated Beneficial Uses of Mammoth Creek**

Beneficial Use	Designated Beneficial Use
MUN – Municipal and Domestic Supply	Existing or Potential
AGR – Agricultural Supply	Existing or Potential
FRSH – Freshwater Replenishment	Existing or Potential
COMM – Commercial and Sport Fishing	Existing or Potential
GWR – Groundwater Recharge	Existing or Potential
REC1 – Water Contact Recreation	Existing or Potential
REC2 – Non-Contact Water Recreation	Existing or Potential
COLD – Cold Freshwater Habitat	Existing or Potential
RARE – Rare, Threatened, or Endangered Species	Existing or Potential
MIGR – Migration of Aquatic Organisms	Existing or Potential
SPWN – Spawning, Reproduction, and Development	Existing or Potential
WILD – Wildlife Habitat	Existing or Potential
<i>Source: Water Quality Control Plan, Lahontan Region; California Regional Water Quality Control Board, Lahontan Region, 1994.</i>	

The only TMDL-related work that is currently being undertaken by the RWQCB in the vicinity of the Mammoth Basin is the development of a nutrient TMDL for Crowley Lake, a reservoir on the Owens River downstream of the Mammoth Creek/Hot Creek confluence. However, the sources of these elevated nutrients are considered to most likely consist of pastures utilized for the grazing of cattle and located well downstream of the Town.

Additional Federal and State Regulations

Storm runoff from the Project site and discharges of runoff into and/or encroachment upon natural drainages, wetlands, and/or flood plains are subject to the requirements of the federal CWA and associated regulations, the State Porter-Cologne Water Quality Control Act and associated regulations, and to requirements established by the U.S. EPA, California EPA, SWRCB, Lahontan RWQCB, the Town, and the Mammoth Community Water District.⁵ In addition, intrusions into jurisdictional areas are subject to the requirements of the CWA (Section 404/401 permitting) and Sections 1600-1607 of the State Fish and Game Code (the “Streambed Alteration Agreement Act”), and to the respective requirements established by the U.S. Army Corps of Engineers (“Corps”) and California Department of Fish and Game (CDFG) to administer these programs.

Section 401 of the CWA requires that any person applying for a federal permit or license which may result in a discharge of pollutants into waters of the United States must obtain a state water quality

⁵ Federal CWA is at Chapter 33, United States Code, Sec. 1251 et seq.; Porter-Cologne Water Quality Control Act is at California Water Code, Sec. 13000 et seq.

certification that the activity complies with all applicable water quality standards, limitations, and restrictions. No license or permit may be issued by a federal agency until certification required by Section 401 has been granted. Further, no license or permit may be issued if certification has been denied. Section 401 water quality certification is normally provided with coverage under the General Construction Activities Stormwater Permit (“General Permit”).

In addition to the designation of beneficial uses and the establishment of applicable water quality standards and criteria, the Lahontan RWQCB Basin Plan also sets forth a series of land development guidelines intended to afford water quality protection for surface and groundwater (included in Appendix G to this Draft EIR). Although not mandatory, adoption of these guidelines by individual counties and municipalities within the Lahontan Region is recommended. In addition to these general guidelines, the Lahontan RWQCB Basin Plan identifies a set of specific policies and guidelines applicable to the Mammoth Lakes area above the 7,000 foot elevation contour (which includes the Project site). The policy requires that the equivalent of a SWPPP be submitted to the Lahontan RWQCB at least 90 days prior to the start of construction activities for new developments of either six or more dwelling units or commercial development involving soil disturbance of 0.25 acre or more. The guidelines stipulate the specific components of this submittal, including the identification of interim erosion control measures to be applied during construction and short- and long-term erosion control measures to be employed following the construction phase.

Local Programs

The Town is currently in the process of updating the *1984 Storm Drainage and Erosion Control Design Manual* that was prepared around the time the Town incorporated. This document specifies modeling and design approaches required for development projects located within the area served by the Town’s storm drainage system. Although the new 2005 Storm Drain Master Plan is not yet finalized, progress is sufficient enough that current development proposals are expected to be consistent with the data and modeling approaches it utilizes. In addition, developments within the Town’s storm drainage service area must comply with the erosion control requirements outlined in the *1984 Storm Drainage and Erosion Control Design Manual*.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, a significant impact would occur if a project would:

- (a) Violate any water quality standards or waste discharge requirements;
- (b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater

table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

- (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site;
- (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- (e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- (f) Otherwise substantially degrade water quality;
- (g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- (h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- (i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- (j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Threshold (g), (h) and (i) listed above were determined to result in no impact. Therefore, only Thresholds (a), (b), (c), (d), (e), (f), and (j) listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project's fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact HYD-1 Water Quality Standards

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies which regulate surface water quality (in this case, the Lahontan RWQCB). Significant impacts would occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the land development policies and guidelines applicable to the Mammoth Lakes area above 7,000 feet specified by the RWQCB in the Basin Plan.

Construction-Related Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust, concrete washout, and other solid wastes.

In addition, grading activities can greatly increase erosion processes, leading to impacts on storm drains and sediment loading to storm runoff. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control offsite migration of

pollutants. The area of disturbance for this Project is greater than one acre; therefore the Project is subject to the requirements of the National Pollution Discharge Elimination System (“NPDES”) requirements for construction projects as enforced by the RWQCB. The Project would require a Notice of Intent to associate this Project with the General Permit and the preparation and implementation of a Storm Water Pollution Prevention Plan (“SWPPP”) during construction.

Specific BMPs to be implemented on the Project site would be identified in detail in the SWPPPs to be prepared for individual developments within the Mammoth Crossing area. Though the requirements of permits are not anticipated, work shall conform to conditions of the Army Corps of Engineers, Lahontan Regional Quality Control Board, and State of California Fish and Game.

Construction activities associated with all proposed development within the proposed Mammoth Crossing area would be subject to inspection and would be required to be conducted in conformance with the General Permit. Coverage under this permit must be obtained from the SWRCB prior to start of construction. The General Permit requires that non-stormwater discharges from construction sites be eliminated or reduced to the maximum extent practicable, that a SWPPP be developed governing construction activities for the Project, and that routine inspections be performed of all stormwater pollution prevention measures and control practices being used at the site, including inspections before and after storm events.

The SWPPP prepared for construction of the Project must also address hazardous materials storage and use, erosion and sedimentation control, and spill prevention and response in addition to identifying measures for preventing non-stormwater discharges to surface water drainages and the Town’s storm drain system. In addition, provisions for implementing the land development policy and guidelines pertaining to the Mammoth Lakes area in the Basin Plan must be included in the SWPPPs. The required implementation of the BMPs in the Project’s SWPPP would ensure that Project construction activities within the Project area would not cause the violation of any water quality standards within Mammoth Creek. Thus, the Project would have a *less-than-significant* impact on the ability of Mammoth Creek to attain all applicable water quality standards.

Operation-Related Impacts

Activities associated with operation of the Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking areas and the internal roadway surfaces could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality generated from Project operation can be reduced through the proposed implementation of BMPs designed to be protective of receiving water quality. These BMPs, as proposed in the Drainage Reports prepared for proposed development within the Project area, include detention and sedimentation basins as well as *Rainstore 3* infiltration systems designed to filter runoff from paved areas on the Project site. BMPs require that storm drainage facilities be maintained to continue to work as designed. Particular items requiring maintenance include, but are not limited to, cleaning of the grates, removal of foreign materials

from storm drainage pipes, maintenance as necessary to outlet facilities, and repairs as necessary to damaged facilities. Additionally, snow removal would be performed in a way so as not to restrict drainage collection in gutters, inlets, and flow paths and snow shall not be placed where it will melt across traveled surfaces. However, even with implementation of required BMPs, operation of the Project could generate substances that could degrade the quality of water runoff resulting in a potentially **significant** impact to the receiving water quality in Mammoth Creek. Implementation of the following mitigation measure would reduce the Project's impacts to water quality standards to a less-than-significant level.

Mitigation Measure HYD-1 Water Quality Standards

In consultation with the Town, the Project Applicant shall identify and implement a suite of stormwater quality BMPs designed to address the most likely sources of stormwater pollutants resulting from operation of the proposed development projects within the proposed Project area. Pollutant sources and pathways to be addressed by these BMPs include, but are not necessarily limited to, parking lots, maintenance areas, trash storage locations, rooftops, interior public and private roadways, and storm drain inlets. The design and location of these BMPs will be subject to review and comment by the Town. Implementation of these BMPs shall be assured by the Community Development Director and Town Engineer prior to the issuance of Grading or Building Permits.

Impact HYD-2 Groundwater Depletion or Recharge

A significant impact may occur if a project would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Construction-Related Impacts

The generalized static groundwater level is approximately 100-feet below the ground surface. Given that the minor amount of groundwater that would be encountered and require pumping during construction from the Project site would not be extensive, groundwater pumping would not be substantial enough to deplete or interfere with groundwater recharge and would be considered **less than significant** and no mitigation measures are required.

If required, dewatering must be done in accordance with the General Permit adopted by the Lahontan RWQCB – NPDES No. CAG996001. The Project Applicant would be required to apply for coverage under this permit prior to beginning any dewatering work.

Operation-Related Impacts

As previously discussed, recharge of regional groundwater is dependent upon annual precipitation and groundwater is a key source of water supply for the Town. Because development of the Project would increase the amount of impervious surface, groundwater recharge impacts could be potentially **significant**. (Impervious surface area is discussed in detail under Impact HYD-4 Drainage System

Capacity below). Although, development of the Project is not anticipated to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, implementation of the following mitigation measures would reduce groundwater recharge impacts to a less-than-significant level.

Although generalized static groundwater level is approximately 100-feet below the ground surface, due to typical heavy snowpack melting in the spring, nearly all sites in Mammoth Lakes are subject to seasonal high groundwater and structures need to be protected from high groundwater levels. All Project structures, including but not limited to underground structures, parking garages, basements, underslabs, and crawl spaces would require subdrains, which would drain to retention basins. Nonetheless, operation impacts pertaining to groundwater intrusion to Project structures would be potentially **significant**. Implementation of the following mitigation measures would reduce anticipated impacts pertaining to groundwater intrusion to Project structures would to a less-than-significant level.

Mitigation Measure HYD-2a Groundwater Depletion or Recharge

All underground structures shall be designed with exterior wall drain board to a footing drain system as well as underslab subdrains. Crawlspace shall be protected with proper ventilation and subdrains. The system shall be designed such that subdrains shall be designed with outlet systems that have maximum water surface elevations lower than the bottom of the subdrains to ensure that subdrains would not be inundated with stormwater when retention basins reach capacity. Subdrain design shall be based on final Project design and shall be adequately sized so that retention basin capacity is maintained for stormwater retention purposes.

Mitigation Measure HYD-2b Groundwater Depletion or Recharge

In consultation with the Town and in compliance with the Lahontan RWQCB, and subject to the Town approval, the Project Applicant shall identify and install infiltration BMPs to offset the loss of pervious surface as a result of Project development. Infiltration BMPs would be selected based on Final Development Plans and design considerations in accordance with the methodology contained in the *California Stormwater Quality Association's New Development and Redevelopment Handbook*. Infiltration BMPs that would be considered could include infiltration trenches, pervious pavements, vegetated buffer strips or swales, and bioretention. Final selection would be dependent upon site characteristics and Final Development Plans and design considerations.

Impact HYD-3 Drainage Pattern Alteration

Construction-Related Impacts

Sites 1, 2, and 3 of the Project are developed and redevelopment of the proposed Project area would require grading, but no major modification of existing drainage paths. Proposed drainage conditions would be very similar to existing conditions. However, siltation or other pollution carried by this

increased runoff can be delivered to adjacent drainage channels during construction and can impact aquatic organisms and water quality downstream of the Project site.

As discussed above under Impact HYD-1, the required implementation of the BMPs in the Project's construction SWPPP would ensure that Project construction activities within the Project area would not cause substantial erosion or siltation on or off site. These BMPs would include, at a minimum, such measures as limiting site grading to dry spring and summer months and siltation fencing. Thus, the Project would have a *less-than-significant* impact in terms of increasing on- or off-site erosion and siltation through the alteration of existing drainage patterns and no mitigation measures are required.

Operation-Related Impacts

Sites 1, 2, and 3 of the Project are currently developed. Activities associated with the operation of the proposed new developments within the Project area are not considered likely to substantially increase on- or off-site erosion or siltation. Nonetheless, the proposed installation of permanent storm control facilities and sedimentation/infiltration basins will reduce Project-generated erosion and siltation impacts (see Mitigation Measure HYD-1).

Therefore, impacts pertaining to Project operation-generated erosion and siltation anticipated to result from new development within the proposed Project area would be *less than significant* and no mitigation measures are required.

Impact HYD-4 Drainage System Capacity

As previously stated, the proposed Project is conceptual and as such the specific details of the Project are subject to change and should be considered as estimates only. Overall, the Project would create 266,660 square feet of impervious surfaces consisting of roofs, drives, parking areas and other hard-scape areas. The Project would include 137,460 square feet of landscaped or natural areas. Overall, development of the proposed Project would decrease the impervious surface on Site 1 by approximately 8 percent, and increase the impervious surface for Sites 2 and 3 by 44 and 29 percent, respectively.

The drainage boundaries have been defined based on the existing and proposed conditions. Property lines do not play a major role in establishing the drainage boundaries. Drainage areas described in this discussion are shown in Appendix A of the *Preliminary Drainage Study* located in Appendix G of this Draft EIR. Drainage area 1A encompasses the entire Site 1. Drainage area 2B is based on the existing conditions of Site 2, with an additional area, Area 2A, added due to the proposed development on Site 2. Site 3 contains five drainage areas: 3A, 3B, 3C, 3D, and 3E. For this analysis, on-site runoff values were calculated for 20- and 100-year intensity storms. Drainage for both off-site and on-site conditions for each of the Project's three sites is discussed below.

Site 1

Project Site 1 (Drainage Area 1A) occupies approximately two acres and would be redeveloped with approximately 71,992 square feet of impervious surfaces including roof and pavement areas; an eight percent decrease. The Project would include approximately 6,151 square feet of landscaped area. All post-development on-site runoff would be directed to an existing 36-inch storm drain inlet located at the southeast corner of Site 1. Since Site 1 is already developed, and the proposed development would decrease the impervious surface area at Site 1 by approximately 8 percent, the existing capacity of the inlet and the connecting storm drain system would be adequate. Therefore, impacts from Site 1 related to drainage system capacity would be considered *less than significant* and no mitigation measures are required.

Site 2

Project Site 2 (Drainage Areas 2A and 2B) occupies approximately five acres and would be redeveloped with approximately 120,176 square feet of impervious surfaces, including roof and pavement area; a 44 percent increase. The Project would include approximately 76,737 square feet of landscaped area. All post-development on-site runoff would be directed to an existing off-site swale located southeast of the site via a proposed on-site detention basin. The runoff from the natural and undisturbed areas would be allowed to continue in historic sheet flow.

The proposed development would increase the impervious surface of Site 2 by approximately 44 percent. The total runoff rate from Site 2 during a storm of 20-year intensity would be 8.9 cubic feet per second (cfs). The Project design would include an on-site graded swale with a bottom width of one foot and side slopes of 3:1 to convey the required flow. An off-site swale currently conveys runoff to the existing 36-inch storm drain under Minaret Road, which eventually outlets to the Sierra Star Golf Course, the historic destination for this runoff. The depth of this swale varies from approximately 12 inches to 24 inches and the depth of flow during a 100-year storm would be 7.8 inches. Therefore, the capacity of this swale is adequate to convey the required runoff during a storm of 100-year intensity.

An off-site 36-inch storm drain is currently located in subarea 3.6.5 of the 2005 Storm Drain Master Plan.⁶ Based on the 2005 Storm Drain Master Plan, the 20-year runoff entering this storm drain is 14 cfs. To obtain a 100-year runoff value, 20- and 100-year cfs/acre ratios from Appendix B of the 2005 Storm Drain Master Plan were used. The runoff rate for the 100-year intensity storm entering the existing 36-inch storm drain is 27 cfs. The capacity of the existing storm drain pipe at 94 percent full is 145 cfs. Redevelopment of Site 2 would increase runoff by 0.2 cfs, producing 27.2 cfs entering the existing 36-inch storm drain. Since the capacity of the storm drain is 145 cfs, impacts on Site 2 related to drainage system capacity would be considered *less than significant* and no mitigation measures are required.

⁶ Subarea 3.6.5 is illustrated on Exhibit 8.13 and is included in Appendix D of the Preliminary Drainage Report included as Appendix G of this Draft EIR.

Site 3

Site 3 (Drainage Areas 3A, 3B, 3C, 3D, and 3E) occupies approximately three acres and would create 74,492 square feet of impervious surfaces consisting of roof and pavement area; a 29 percent increase. The Project would include 54,572 square feet of landscaped area. Post-development on-site runoff from Areas 3A and 3C would be directed to a future inlet at the east property line, which was originally designed as part of the 7B at the Grove project (a part of the *Sierra Star Master Plan* development).⁷ According to the Preliminary Drainage Study prepared for the Project, there would be no increase in runoff for these areas.

Runoff from Areas 3B and 3E would exit the site as sheet flow as it has historically done. The increase in runoff from Area 3B would be only 0.2 cfs, an insignificant addition to the existing flow. There would be no increase in runoff for Area 3E.

Area 3D encompasses the future 7B Road from Minaret Road to the proposed 7B at the Grove project site (a part of the *Sierra Star Master Plan* development). Runoff from this area would be controlled by the drainage system proposed for the 7B at the Grove project (as part of the *Sierra Star Master Plan* development).

Therefore, impacts from Site 3 related to drainage system capacity would be considered ***less than significant*** and no mitigation measures are required.

Street Drainage

Lake Mary Road, Canyon Boulevard, Main Street, and Minaret Road are adjacent to the Project site. Street parking is proposed for Sites 1 and 2 on the north and south sides of Lake Mary Road. If the amount of impervious surface within these areas is increased as part of the street parking, retention/infiltration basins would be added as required. Parking spaces along the south side of Lake Mary Road are included in retention/infiltration calculations for Site 2.

No major grading of the roads adjacent to the Project site is anticipated and street drainage would continue to flow as under present conditions. Curb and gutter installation is proposed along the east and west side of Minaret Road, which would convey the runoff to the south. An existing 36-inch storm drain along the east side of Minaret Road would need to be relocated into the Town's right-of-way. Based on analysis consistent with the 2005 Storm Drain Master Plan, development of the Project would not require any improvements to the Town's storm drain system in the vicinity of the Project site. Additionally, all improvements proposed in the *1984 Storm Drainage and Erosion Control Design Manual* in the Project vicinity have been addressed by previous projects.

⁷ Illustrated in Appendix A of the Preliminary Drainage Report included as Appendix G of this Draft EIR.

After construction of the Project, proposed conditions would be similar to existing conditions. Runoff would be conveyed through the sites to existing and proposed drainage facilities and then allowed to continue downslope under as close to historic conditions as practicable. The Project would have no significant impact on the immediate neighboring properties with respect to stormwater runoff.

However, Project impacts to the Town's storm drain facilities farther downstream (i.e., in the neighborhood of the Sierra Valley Sites) as a result of development on Sites 2 and 3 would be potentially **significant** as these facilities are currently operating at capacity according to the Town. In addition, additional storm drain line, or facilities may be required for runoff if the curb and gutter improvements made on Minaret Road exceeds the capacity of the curb and gutter system. As stated above, development on Site 1 would not result in any net increase in impervious surface area and therefore runoff quantity. As such, no impacts to Town drainage facilities would occur from Project development at Site 1. Implementation of the following mitigation measure would reduce drainage capacity impacts from Project development at Sites 2 and 3 to a less-than-significant level.

Mitigation Measure HYD-4a Drainage System Capacity

The Project Applicant shall design and construct improvements identified in the 2005 Storm Drain Master Plan to the extent necessary, as determined by the Town's Public Works Department, to increase the capacity of the Town's drainage facilities including the downstream Sierra Valley Site if no such improvements have been made by the time occupancy of Site 2 and Site 3 of the Project occurs.

Mitigation Measure HYD-4b Drainage System Capacity

In consultation with the Town and Lahontan RWQCB, and subject to Town approval, the Project Applicant shall identify and implement a suite of storm drainage facilities designed to safely capture, treat, and convey runoff from the required design storms. In addition, a detailed set of maintenance procedures necessary to assure that these storm drain facilities continue to work as designed shall be established and approved by the Town, in consultation with the Lahontan RWQCB. Particular items requiring maintenance include, but are not limited to, cleaning of gates, removal of foreign materials from storm drainage pipes, maintenance as necessary for outlet facilities and retention basins, and repairs as necessary to damaged facilities.

Impact HYD-5 Inundation by Mudflows

Mudflows result from soil instabilities created by steep slopes, shallow soil development, excess water, and lack of shear strength in the area. Erosion of supporting material at the foot of constructed slopes is another major cause of sliding, which can cause mudflows. Landslides and mudflows are limited primarily to areas with a combination of poorly consolidated material and slopes that exceed 30 percent. Evidence of past landslides was not observed either during aerial photographic review or in the field and the potential for mudflows to occur on the Project site is considered low, given the distance of the site to

any steep slopes. Therefore, impacts related to inundation by mudflows would be considered *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact HYD-6 Cumulative Impacts

Development of the Project in combination with the of the 40 related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would result in the further infilling of uses in an urbanized area. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. As discussed above, the Project site and the surrounding area primarily consist of a patchwork of developed areas and developed impervious urbanized surfaces, and are served by existing storm drains sufficient to serve new development. It is likely that most of the related projects would also drain to the Town's storm drain system. Each individual related project would be required to submit a drainage analysis to the Town. Each drainage analysis must illustrate how peak flows generated from each related project site would be accommodated by the Town's existing and/or proposed storm drainage facilities. Where necessary, each related project would be required to include detention or infiltration features designed to reduce the total rate and/or volume of runoff generated at its site. Therefore, cumulatively considerable impacts to the Town's existing or planned stormwater drainage system capacity would be less than significant. In addition, per the Basin Plan, development on each site larger than 0.25 acre above the 7,000 foot elevation level would be subject to uniform policy guidelines designed to minimize the water quality impacts associated with Project construction to the maximum extent practicable. All related projects that disturb one acre or more must also obtain coverage under the General Permit, including the preparation and submittal of a SWPPP to govern all construction activities associated with each project. As a result, cumulatively considerable water quality and erosion/siltation impacts would be reduced to a *less-than-significant* level.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the Mitigation Measure HYD-1 Water Quality Standards, Mitigation Measures HYD-2a and 2b Groundwater Depletion or Recharge, and Mitigation Measures HYD-4a and 4b Drainage System Capacity listed above, and compliance with applicable regulations, would reduce all Project impacts to surface and groundwater resources and hydrology to a *less-than-significant* level.

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. LAND USE AND PLANNING

INTRODUCTION

This section of the Draft Environmental Impact Report (“Draft EIR”) analyzes the potential for adverse impacts related to land use and planning resulting from implementation of the proposed Mammoth Crossing Project (“Project”).

ENVIRONMENTAL SETTING

Project Site and Surrounding Land Uses

The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection, which includes parcels at the northwest, southwest and southeast corners, for a total of approximately nine acres. The Project site is comprised of the following Assessor’s Parcel Numbers (“APNs”) and associated land use areas shown in parenthesis: 33-044-07 and 33-044-10 (Site 1 [Whiskey Creek Restaurant Site]); 33-010-02 through -07 and 33-010-31 and -32 (Site 2 [Church Site]); 33-100-14 though -18 (Site 3 [Ullr Lodge/White Stag Inn Site]); and 33-330-47 (Site 4 [Lodestar Parcel]).

The land uses surrounding the Project’s four locations are as follows:

- Site 1 is bounded to the north by the Fireside Condominiums, to the east by Minaret Road, to the south by Lake Mary Road and to the west by Canyon Boulevard. Site 1 is fully bounded by *North Village Specific Plan* (“Specific Plan”) land use zoning.
- Site 2 is bounded to the north by Lake Mary Road, to the east by Minaret Road, to the south by the Sierra Star Golf Course and to the south and west the Hidden Valley Condominiums. Site 2 is bounded by Specific Plan land uses to the north, east and south, and by Residential Multi-Family 2 (RMF-2) land use zoning to the south and west.
- Site 3 is bounded by Main Street to the north, the Holiday Haus Inn and the Sierra Star Golf Course to the east, Site 4 and the Sierra Star Golf Course to the to the south and Minaret Road to the west. Site 3 is bounded by Specific Plan land use zoning to the north and west, and Commercial (Lodging) and Resort (R) zoning to the east, and R zoning to the south.
- Site 4 is bounded by Site 3 to the north, the Sierra Star Golf Course to the east, residential development to the south and Minaret Road to the west. Site 4 is bounded by Specific Plan land use zoning to the north, west and south, and by R zoning to the east.

Figure II-3 in Section II, Environmental Setting, of this Draft EIR illustrates the land uses of the proposed Project and surrounding areas.

Land Use Designation and Zoning

Town of Mammoth Lakes General Plan 2007

California State Government Code Section 65300 requires each county and city, including charter cities, to adopt a comprehensive General Plan which should be integrated and internally consistent with a compatible statement of goals, objectives, policies and programs to provide for a decision-making basis on physical development. The Project site falls within the jurisdiction of the *Town of Mammoth Lakes General Plan 2007* (“General Plan”), adopted by the Mammoth Lakes Town Council on August 15, 2007. The General Plan consists of nine elements, including: 1) Economy; 2) Arts, Culture, Heritage, and Natural History; 3) Community Design; 4) Neighborhood and District Character; 5) Land Use; 6) Mobility; 7) Parks, Open Space, and Recreation; 8) Resource Management and Conservation; and 9) Public Health and Safety.

The General Plan contains a specific plan area land use designation intended to provide a more refined description of land uses and development policies for the North Village. Additionally, the specific plan area, while conforming to the overall development goals established in the General Plan, is oriented toward the ultimate goal of establishing the North Village as a center for year-round resort activity. The General Plan designates Sites 1, 2, and 3 as *North Village Specific Plan* (“Specific Plan”). The Specific Plan was adopted in December 2000. It was amended in January 2005 and May 2008. Site 4 is currently within the *Lodestar Master Plan* (“LMP”) area and designated as Resort land use.

The proposed development of Site 4, commonly known as the Tanavista project, is comprised of 45 residential condominiums (consistent with the LMP’s allowed maximum density of 33 units¹ per acre) was approved by the Town of Mammoth Lakes in February 2007 (Tentative Tract Map [“TTM”] 36-240, Use Permit Application [“UPA”] 2006-08). A Mitigated Negative Declaration was prepared and adopted by the Town for the project at the same time. Due to construction estimates, the building permit application was withdrawn and as of October 2007, there are currently no plans to develop Site 4 as approved although the TTM and UPA remain current. The Project Applicant proposes to leave the zoning parameters on Site 4 as they are approved in the February 2007 *Lodestar Master Plan* amendment and District Zoning Amendment (“DZA” 2006-02). Any development that would occur on this site has been previously analyzed in the Mitigated Negative Declaration prepared in February 2007 by the Town, and in the Environmental Impact Report for the LMP, prepared by EIP Associates, and certified by the Town in February 1991 (SCH#90020042). As such, the land use and planning impacts analyzed in the Draft EIR will be limited to those associated with the development of Project Site 1 through 3.

The objectives of the Specific Plan include development of year-round uses and visitor activity to strengthen the existing winter visitor market and to improve Mammoth’s attractiveness to spring,

¹ Note that under the Specific Plan density is calculated by rooms per acre and not units per acre.

summer, and fall resort visitors. The Specific Plan establishes architectural and landscaping guidelines to strengthen North Village's image as a resort activity node in Mammoth Lakes. The Specific Plan is intended to create visitor services and attractions, while emphasizing pedestrian access and mobility. Parcels developed for non-lodging purposes will be oriented toward visitor commercial uses. Development densities and standards and the mix of permitted/conditional uses within each land use district will result in a variety of hotel, commercial, and residential uses. Uses include hotels and similar visitor accommodations along with supporting restaurants, retail, and services. Detailed allocation of density, location of uses, and development standards as specified in the Specific Plan are discussed below.

In addition, the 2007 General Plan includes policies in the Neighborhood and District Character Element specifically addressing the desired characteristics and roles of the North Village District. The General Plan policies applicable to the Project are discussed further below in the Environmental Impacts section in Table IV.I-2.

Town of Mammoth Lakes Zoning Regulations

The Zoning Ordinance (Mammoth Lakes Municipal Code, Title 17) sets forth provisions governing the use and development standards of land, buildings, and structures in the Town. Some of those development standards address the size of yards abutting buildings and structures, height and bulk of buildings, density of population, number of dwelling units per acre, standards of performance, and other development criteria. The purpose of the Zoning Ordinance is to promote and protect the public health, safety, and welfare of the people of the Town, to safeguard and enhance the appearance and quality of development of the Town, and to provide for the social, physical and economic advantages resulting from comprehensive and orderly planned use of land resources (Section 17.04.010). Sites 1, 2, and 3 are zoned Specific Plan (SP). There are no provisions set forth by the Zoning Ordinance for parcels zoned SP. However, the parcels within the Project site zoned SP are subject to the provisions of the Specific Plan discussed below.

North Village Specific Plan 2000

The Project site falls within the jurisdiction of the *North Village Specific Plan 2000* ("Specific Plan") adopted by the Town Council in December 2000 and amended January 19, 2005. The purpose of the Specific Plan is to provide a more refined description of land uses and development policies, which, while conforming to the overall development goals established in the General Plan, are oriented toward the ultimate goal of establishing North Village as a center for year-round resort activity. The Specific Plan is comprised of the same elements identified in the General Plan. Objectives, policies, and implementation standards presented in the Specific Plan are oriented toward increased visitor uses and services and reflect the overall goals and policies established in the General Plan.

The Specific Plan designation contains land use districts indicating site-specific land use designations for individual parcels. Site 1 is zoned as Resort General (RG) and Sites 2 and 3 are zoned as Specialty

Lodging (SL) in the Specific Plan. The Specific Plan also contains development and design standards describing density, site coverage, building area and heights, building setbacks, and other building design specifications. Table IV.I-1 consists of a land use matrix displaying permitted uses, uses requiring administrative permit, and uses subject to use permit within the RG and SL designations.

**Table IV.I-1
North Village Specific Plan Land Use Matrix**

Permitted Uses	Resort General	Specialty Lodging
Office and Related Uses		
Administrative, clerical, and professional offices	O	
Financial institutions	O	
Telegraph/postal service offices	X	
General Commercial Uses		
Amusement, arcades, billiards, indoor recreation uses	O	
Automobile rental agency	O	
Bakeries, retail	X	
Barber and beauty shop	X	
Bicycle and moped rental, sales and service	O	
Catering establishments	O	
Cocktail lounges and bars	X	
Delicatessen	X	
Drug stores and pharmacies	O	
Hotels, resort condominiums, and inns	X	X
Night clubs	O	
Recreational facilities, commercial or public, outdoor	O	O
Restaurants, bars, night clubs within hotels	X	X
Restaurants	X	
Retail	O	
Accessory commercial uses within a hotel	X	X
Bed and Breakfast inns	X	X
Services (e.g., Laundromat, copying)	X	
Freestanding parking structures	A	A
Public and Quasi-Public		
Day nurseries and nursery schools	O	O
Libraries and museums, public or private	O	O
Parks, public or private	X	X
Post office branch	O	
Governmental offices and facilities	O	O
Convention and meeting facilities within or adjacent to lodging facilities	X	O
Ski area development		O
Events arena	O	O
Freestanding parking structures	A	A
Housing		
Employee, affordable, apartments, condominiums, other	X	X
<i>Notes:</i> <i>X = Permitted Use, O = Subject to Use Permit, A = Administrative Permit</i> <i>Source: North Village Specific Plan 2000, adopted December 2000 and amended May 21 2008.</i>		

Land Use Designations with the Specific Plan

The RG designation is applied to parcels adjacent to and easily accessible to the gondola plaza within the North Village, but still within the Pedestrian Core Overlay area. RG uses are also intended to provide visitor oriented resort services, although with lesser intensity than Plaza Resort (PR) parcels. The RG designation differs from the PR designation in that retail uses are limited to multi-tenant complexes or within full-service hotels. Restaurants are generally the only freestanding uses permitted in the RG district. Allowable uses in the RG district include hotels, resort condominiums, restaurants, residential, and employee housing facilities.

Policies specific to the RG land use district include:

1. A variety of resort oriented lodging and limited commercial uses shall be developed in the RG district. Visitor lodging shall be primarily inns, resort condominiums, or specialty lodging, as opposed to motels.
2. Predominantly understructure parking shall be required.
3. At least 50 percent of all commercial uses within a multi-tenant commercial development shall be devoted to restaurants.
4. Convenient, safe pedestrian connections to the rest of the North Village area, transit facilities and ski lifts shall be provided.

The SL designation is used for parcels located on the periphery of the Specific Plan area which are physically separated by topography and integrated access from the Pedestrian Core Overlay area. Often these parcels are adjacent to existing residential developments zoned RMF-2 (Residential Multiple Family-2) or RSF (Residential Single Family). Although some flexibility through the use permit process is provided, this designation promotes land uses such as lodges, bed and breakfast establishments, resort condominiums, European-style inns, employee housing, various residential uses, and public facilities.

Policies specific to the SL land use district include:

1. Development in this district shall be oriented toward visitor and resident lodging, resort condominiums, timeshare units or employee housing. Visitor lodging shall be inns or specialty hotels (i.e., European) as opposed to motels.
2. Development of parcels in this district strictly for commercial retail shall be prohibited to avoid strip commercial development and incompatibility with nearby residential uses.
3. Predominantly understructure parking shall be required.

Density

The maximum allowed density for RG zoning is 55 RPA, not to exceed an aggregate density of 48 RPA for the entire RG district. The maximum allowed density for SL zoning is 48 RPA. The Specific Plan allows for density exchanges among parcels in the same district under specific conditions.

- i. Density exchanges may only occur between parcels within the same district except as follows:
 - a. Where parcels with different land use designations are merged to accommodate a building that crosses the original designation boundary, density may be combined such that the total density of the new parcel is equal to the sum of the densities for each parcel prior to the merger.
 - b. Densities for the SL parcels 39, 22, 41 and the SL portions of parcels 21 and 28 may be transferred to the PR district.
 - c. Density from the ski-back trail Parcel “A” may be transferred to other PR parcels.
- ii. Density exchanges may permit greater density per acre on one parcel subject to a commensurate reduction in density on the other parcel when all other development requirements can be met.
- iii. The density exchange accomplishes at least one of the following:
 - 1) concentrates retail and accommodation uses adjacent to a major public plaza, 2) accommodates the location of public facilities including public parking structures, and 3) protects sensitive environmental areas, such as view corridors, vegetation, or steep slopes.
- iv. A request for a density exchange shall be subject to the approval of the Community Development Director.

Site Coverage

Maximum site coverage including all buildings and paved or otherwise developed impervious surfaces for each development area for the RG district is 70 percent. Maximum site coverage for the SL district is 60 percent.

Building Heights

Maximum building heights for the RG and SL districts are 40 feet with a maximum projected height of 50 feet. Building projections above the permitted height may be allowed, provided that a roughly equivalent reduction in the building footprint area above the height is provided below the permitted height and no more than 50 percent of the building square footage exceeds the permitted height. All buildings shall be measured to the building roof ridgeline of any section of roof. All building heights shall be measured

vertically from natural grade when the building does not sit above a parking garage. When all or a portion of a building sits above a parking garage, building height shall be measured from the garage roof elevation or plaza elevation at the perimeter of the building. In Resort General and Specialty Lodging areas when a substantial number of affordable housing units is provided within a proposed development, a one floor increase (maximum 12 feet in height and equivalent in area to the number of affordable units provided) in building height may be permitted if all other development standards are met (particularly in relation to shading, solar access and view corridors), subject to the approval of the Planning Commission.

Setbacks

Setbacks are measured from street rights-of-way and from Specific Plan boundaries. For the purpose of measuring setbacks, building heights are determined at the intersection of the building with a vertical plane established by the setback line. Measurement of building height is from natural grade. In RG and SL districts along Minaret Road and Lake Mary Road/Main Street, side and rear setbacks are generally a minimum of ten feet, however this distance can vary depending on the building location and height of the proposed building.

The Specific Plan also provides the following land use descriptions for site-specific uses within the Specific Plan area:

Site 1

The Inyo Mono Title parcel currently contains approximately 1,925 square feet of office commercial uses. According to the Specific Plan, this parcel can remain as a stand-alone use or be developed with a mix of first floor commercial or restaurant uses, with or without accommodations or residential uses with building heights of one to four levels. The Whiskey Creek site presently has an approximate 10,000 square feet restaurant with associated parking. According to the Specific Plan, this parcel can remain as a standalone use or be developed with a mix of first floor commercial and restaurant uses in conjunction with accommodation or residential uses above with building heights of one to four levels.

Sites 2 and 3

Parcels located within Sites 2 and 3 designated as SL differ from other sites within the Specific Plan area in that they are not easily connected to the pedestrian core. Due to their distance from the North Village Plaza area they are less accessible by foot or vehicle to the North Village Plaza. As such, each parcel is developed as a stand-alone use. Allowed uses include hotels, resort condominiums, inns, bed and breakfasts, housing and other residential uses. Commercial and restaurant uses are only permitted within these uses solely to provide service for their guests. Residential uses are encouraged which contribute to the employee-housing base or are available for short-term rentals. Potential private access easements may be effectuated between parcels 14 and 15 to allow access to the plaza (see Exhibit A of the Specific Plan). Similar in all respects to Planning Area 4, Figure 1, Parcel 14 is located on a hill above the rerouted

Canyon Blvd. This site is the most visible as the North Village is approached on Main Street and thus will make a signature statement for the North Village. Allowed uses include hotels, resort condominiums, inns, lodging, housing and other residential uses. Accessory commercial/restaurant facilities may be provided within the buildings.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) physically divide an established community;
- (b) conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; or
- (c) conflict with any applicable habitat conservation plan or natural community conservation plan.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the Project would have no impact with respect to Thresholds (a) and (c) listed above.

Although there are no adopted thresholds of significance for land use compatibility in the State *CEQA Guidelines*, the following threshold has been used in this analysis:

- A project would have a significant impact if a new land use was incompatible with surrounding existing and future planned development in the project area.

Accordingly, the following discussion focuses on State *CEQA Guidelines* Threshold (b) and the Project's land use compatibility with surrounding land uses.

Project Details

As previously stated, the Project is situated within the *North Village Specific Plan* ("Specific Plan") area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes' General Plan*, which would be required to accommodate the Project's proposed land uses. The Project proposes setback, height, density, and policy amendments to the Specific Plan. The specific amendments have been included as Appendix N of this Draft EIR. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of up to 742 condominium/hotel rooms, up to approximately 69,150 square feet of hotel amenities and operations and general retail uses, 40,500 square feet of retail development, and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project's fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. Project specific details related to design standards have not yet been established. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact LU-1 Consistency with Applicable Land Use Plans, Policies, or Regulations

CEQA requires an analysis of consistency with plans and policies as part of the environmental setting (see State *CEQA Guidelines* Section 15125). An EIR uses the policy analysis as an indicator of the resources that might be affected by a project and considers the importance a policy gives a resource in determining the significance of the physical impact. Conversely, the EIR considers the potential significance of the related physical impacts when analyzing a particular policy. Inconsistency with a policy may indicate a significant physical impact, but the inconsistency is not itself an impact. Using this approach, this EIR provides a detailed analysis of policies of the General Plan and analyses of other applicable plans (such as the Specific Plan, Air Quality Management Plan, and Mono County Local Transportation Commission) and policies so that the decision-makers may determine project consistency. The physical impacts of the Project are analyzed in other sections of the EIR. In addition to the General Plan, the Specific Plan and the Town Zoning Ordinance, the Project is currently governed by the land use policies and regulations set forth in the *Town of Mammoth Lakes Air Quality Management Plan*, the *Lahontan Regional Water Quality Control Plan*, the *Mono County Regional Transportation Plan*, and the *Mammoth Community Water District's Urban Water Management Plan* and the *Groundwater Management Plan*. Consistency analysis with these listed plans are discussed in detail in Section IV.C, Air Quality, Section IV.H, Hydrology and Water Quality, Section IV.M, Traffic and Circulation, and Section IV.N, Utilities of this Draft EIR, respectively

The General Plan Guidelines published by the State Office of Planning and Research defines consistency as, "An action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment." Therefore, the

standard for analysis used in the EIR is based on general agreement with the policy language and furtherance of the policy intent (as determined by a review of the policy context). The determination that the Project is consistent or inconsistent with the General Plan policies or other Town plans and policies is ultimately the decision of the Town. Furthermore, although CEQA analysis may identify some areas of inconsistency with Town policies, the Town has the ability to impose additional requirements or conditions of approval on a project, at the time of its approval, to bring a project into more complete conformance with existing policies.

Town of Mammoth Lakes General Plan 2007

The General Plan contains specific plan areas. The General Plan designates Sites 1, 2, and 3 as NVSP. Sites 1 and 2 would be developed with two hotels (including amenities and operations, pool/spa, conference area, restaurant/bar, and general use areas); affordable workforce housing; retail uses (including restaurant/bar, and general use areas); and parking. Site 3 would be developed with a family-style hotel (including amenities and operations, pool/spa, conference area, restaurant/bar, and general use areas); affordable workforce housing; and parking for hotel guests as well as spaces for use by the general public. As previously discussed, Site 4 is currently within the Lodestar Master Plan area. No development is proposed for Site 4 as part of this Project; however, this parcel would be subject to a General Plan Amendment to incorporate it into the NVSP area.

The objective of the Specific Plan is to develop the North Village as a concentrated, pedestrian-oriented activity center with limited vehicular access. Development should be oriented toward year-round uses and visitor activity to strengthen the existing winter visitor market and to improve the Town's attractiveness to spring, summer, and fall resort visitors. Specifically, the Specific Plan is intended to create visitor services and attractions, while emphasizing pedestrian access and mobility.

The Specific Plan establishes architectural and landscaping guidelines to strengthen the North Village's image as a resort activity node in Mammoth Lakes. Parcels developed for non-lodging purposes should be oriented toward visitor commercial uses. Development densities and standards and the mix of permitted/conditional uses within each land use district should result in a variety of hotel, commercial, and residential uses. Uses include hotels and similar visitor accommodations along with supporting restaurants, retail, and services.

Construction of Project would provide year-round visitor lodging, while development of on-site visitor amenities such as retail, restaurants, personal services, meeting/conference rooms, and recreational facilities would improve the Town's attractiveness to year-round visitors. These land uses would be consistent with the intent of the Specific Plan. Construction of the Project with these uses would serve to integrate the Project site further with other uses and areas in the Specific Plan. Additionally, development of the Project sites with visitor lodging would facilitate pedestrian access to the Gondola and enhance pedestrian mobility in the Specific Plan area.

The Project includes a General Plan Amendment for Site 4 to amend the land use designation of the site from Lodestar Master Plan to the Specific Plan. The site is currently an undeveloped portion of the Sierra Star Golf Course area. No changes to uses or development are proposed on Site 4 under the Project at this time. However, Site 4 is bounded by Specific Plan land use zoning to the north, west, and south. The Specific Plan area contains vacant land, which the Town envisions will be ultimately developed according to Specific Plan standards. Once Site 4 is redesignated to the Specific Plan any proposed development would be required to conform to the Specific Plan development and design standards similar to other vacant parcels in the Specific Plan. Therefore, potential land uses developed on Site 4 would be consistent with the intent of the Specific Plan and would serve to unify the area along Minaret Road in the Specific Plan area.

Table IV.I-2 compares the Project characteristics with all applicable policies outlined in the General Plan as they relate to land use issues. General Plan policies related to aesthetics and visual resources are presented in Section IV.B, Aesthetics, of this Draft EIR. While some policies overlap in both Sections IV.I (Land Use) and IV.B (Aesthetics) of this Draft EIR, the policy consistency analysis for each Section has been prepared to reflect the intent of the policy as it relates to either “land use” or “visual resources,” respectively.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
ECONOMY ELEMENT	
Economic Development	
E.1.D Encourage restaurants, retail, entertainment, lodging, and services.	Consistent. The Project proposes hotel lodging and areas of commercial development including approximately 109,650 square feet of non-residential space including various visitor-serving commercial businesses, entertainment and recreation uses, office and personal services, and public plaza space featuring outdoor seating and landscaping.
Marketing, Promotion and Special Events	
E.1.L Support diverse arts, cultural, and heritage programming, facilities and development of public venues for indoor and outdoor events.	Consistent. The Project proposes public plazas, which could be used for outdoor events. In addition, the Project proposes approximately 9,000 square feet for meeting and conference rooms that could be available for use in staging indoor events.
Sustainable Tourism	
E.2.A Support a range of outdoor and indoor events, facilities, and services that enhance the community’s resort economy.	Consistent. The Project proposes facilities and services for indoor events including approximately 9,000 square feet of conference and meeting space, and public plaza areas for outdoor events and other public spaces. See response to Policy E.1.D and E.1.L.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
Diversify Economy	
E.3.A Encourage mix of uses in the Main Street, Old Mammoth Road, and Shady Rest District and the North Village District.	Consistent. The Project proposes a mix of uses including visitor-lodging and amenities, affordable housing, commercial, and retail uses.
E.3.B Support inclusion of cultural and educational institutions as components of mixed use developments.	Generally Consistent. Although the Project would not specifically provide any cultural or educational institutions it is possible that the public plaza or conference facilities would be used for such events.
E.3.C Support development of major public and private facilities that contribute to destination resort visitation in Mammoth Lakes.	Consistent. See response to Policy E.1.D and E.1.L. The Project proposes several major land use types including commercial, retail, and hotel/resort uses, including a hotels, fitness centers, spas, and conference facilities. The Project would integrate a mix of uses with surrounding development. Additionally, the Project would be located near to the Gondola providing access to Mammoth Mountain skiing facilities. These facilities would contribute to the Town's identity as a resort destination.
E.3.D Encourage adequate and appropriate commercial services for residents and visitors.	Consistent. See response to Policy E.1.D and E.3.C.
Business and Employment	
E.3.E Support establishment and expansion of industries complementary to the community, our environment and economy.	Consistent. See response to Policy E.1.D. The Project would be developed in the North Village, an area of high-profile, pedestrian oriented, resort activity. The Project would be consistent with existing land uses in the North Village and would increase visitor accommodations close to an existing recreation node (Gondola access to Mammoth Mountain). The Project also proposes approximately 109,650 square feet of non-residential space. These uses would complement and expand existing commercial and recreational activities in the Town and would be developed in an environmentally friendly manner by being located near residential uses, incorporating energy efficient materials and practices, and would contribute to the economy of the Town and region.
E.3.F Encourage a wider range of employment opportunities within the community.	Consistent. The Project proposes visitor-serving uses and does not propose any uses that would contribute to a wider range of employment opportunities than currently exist.
E.3.I Support creation of office space and live/work spaces.	Consistent. Although the Project does not include live/work spaces, it would include the construction of 66 on-site affordable housing rooms and office space.
E.3.J Continue to attract a diversified labor force through a mix of housing types and housing affordability.	Consistent. The Project proposes construction of 66 on- and 27 off-site affordable housing units, which would serve to attract a diversified labor force.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
ARTS, CULTURE, HERITAGE AND NATURAL HISTORY	
Rich Community Culture	
A.2.A Encourage and support a wide variety of visual and performing arts, cultural amenities, events and festivals, and forums for local arts organizations.	Consistent. The Project proposes facilities and services available for indoor and outdoor events and other public events.
Expressive of Community	
A.3.B Encourage development of arts, culture, and heritage facilities and venues.	Consistent. See response to Policy E.1.L and A.2.A.
A.3.D Be stewards of the cultural, historical and archeological resources in and adjacent to town.	Consistent. Section IV.E, Cultural Resources, of this Draft EIR includes analysis of cultural, historical and archeological resources and mitigation measures to protect them.
COMMUNITY DESIGN	
Celebrate Public Spaces	
C.2.A Create well-designed and significant public spaces in resort/commercial developments to accommodate pedestrians and encourage social interaction and community activity.	Consistent. The Project would include pedestrian and bicycle linkages from Site 3 to the Sierra Star Golf Course area and Main Street Town-core to the North Village. Other parts of the Project site would include pedestrian connections to outdoor spaces and retail and commercial amenities. As described in Section III, Project Description, of this Draft EIR, a key concept of the Project is to provide pedestrian connectivity within the Specific Plan area. The Project's placement of sidewalks, and paths, and public plazas would aim to connect the hotels and residents with the Town-core, as well as, with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and sidewalks. Public outdoor spaces would be designed to connect community members and allow for community activities including activities such as art fairs or farmers' markets.
C.2.B Maximize opportunities for public spaces that support community interaction, such as outdoor café and restaurant patios, performance and arts spaces, and child activity centers through public-private partnerships.	Consistent. The Project would approximately 109,650 square feet of non-residential space including various visitor-serving commercial businesses, entertainment and recreation uses, and public plaza space featuring outdoor seating and landscaping.
C.2.C Encourage development of distinct districts, each with an appropriate density and a strong center of retail, services or amenities.	Consistent. The Project is consistent with the underlying commercial design concepts expressed in this policy. The Project would be consistent with the Specific Plan, which encourages the development of year-round uses and visitor activity to strengthen the existing winter visitor market and to improve Mammoth's attractiveness to spring, summer, and fall resort visitors. The Specific Plan establishes architectural and landscaping guidelines to strengthen North Village's image as a resort activity node in Mammoth Lakes.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	The Specific Plan is intended to create visitor services and attractions, while emphasizing pedestrian access and mobility. Parcels developed for non-lodging purposes will be oriented toward visitor commercial uses. The Project is designed to meet the overall intent of the Specific Plan and the Town's General Plan, which is to facilitate the development of the area as a concentrated, pedestrian-oriented activity center with limited vehicular access. The proposed density for the Project exceeds the current maximum allowed density of 48 rooms per acre.
C.2.D Preserve and enhance special qualities of districts through focused attention on land use, community design and economic development.	Consistent. The Project would complement the design of the existing <i>North Village Specific Plan</i> area by being consistent with design for the area, proposing land uses in an efficient fashion, and contributing to the resort environment of the Town. The Project would be consistent with the new design or development standards adopted as part of the amended Specific Plan and Mammoth Crossing District, as well as the Design Guidelines and North Village Characteristics. As discussed in Section III, Project Description, of this Draft EIR, the Project would strengthen the North Village's special qualities as a commercial and resort activity node in Mammoth Lakes by providing hotels, restaurants, visitor-oriented and retail operations, and condominiums.
C.2.E Ensure that each district center is an attractive destination that is comfortable and inviting with sunny streets, plazas and sidewalks.	Consistent. See response to Policy C.2.C and C.2.D. The Project would include a pedestrian and bicycle system with interior sidewalks and connecting sidewalks from recreational amenities, outdoor spaces and neighborhoods. The majority of the outdoor spaces available to guests and visitors of the Project would not be impacted by shading of the proposed Project. This is discussed in detail under Impact AES-7 Shading/Shadows in Section IV.B, Aesthetics, of this Draft EIR.
C.2.F Improve visual appearance as well as pedestrian access and activity by requiring infill development patterns. Encourage rehabilitation and reorientation of existing strip commercial development consistent with neighborhood and district character.	Consistent. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces. The Project would redevelop existing commercial development located on Site 1, the residential and commercial buildings on Site 2, and the vacant Ullr Lodge and White Stag Inn on Site 3 into a clustered village consistent with neighborhood and the North Village district character. The existing development on the Project's three sites consists of an assortment of buildings of various styles, ages, structural conditions and heights. The existing development is primarily focused around large surface parking lots fronting Lake Mary Road and Minaret Road. There is

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Policy	Consistency Discussion
	limited street presence and pedestrian amenities associated with the existing development. See response to Policy C.2.A and C.2.D.
C.2.G Ensure that development in commercial areas provides for convenient pedestrian movement between adjoining and adjacent properties.	Consistent. See response to Policy C.2.C and 2.C.E. In addition, the Project provides access to existing and planned pedestrian facilities along Minaret Road, Canyon Road, Lake Mary Road, and Main Street.
C.2.H Support transit ridership and pedestrian activity by emphasizing district parking, shared parking, mixed use and other strategies to achieve a more efficient use of land and facilities.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by proposing several major land use types including commercial, retail, recreation, and hotel/resort uses near transit stops. Additionally, the Project would provide pedestrian and bicycle connections to the North Village and Gondola building, and tying into the larger Town-wide recreational trail network for both existing and future sidewalks and paths. The extent to which the Project proposes a balanced expansion of all major land use types, coordinated with commercial recreation development, would be contemplated by the Town during Project review and/or consideration. Short-term surface parking would be provided adjacent to check-in locations with long-term parking located under the hotel buildings to efficiently use land on the Project site. Shuttle service would be provided by the hotels to destinations in Town as well as the Mammoth Airport.
Celebrate the Spectacular Natural Surroundings	
C.2.I Achieve highest quality development that complements the natural surroundings by developing and enforcing design standards and guidelines.	<p>Consistent. As noted in Section IV.B, Aesthetics, of this Draft EIR, the Project would result in significant unavoidable impacts to one scenic vista. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. As part of the approval process, the Town will review the location of the proposed structures and bulk/massing to determine if this impact can be reduced, and will review the use of building materials, colors, and landscaping to ensure consistency with the Town Development Code.</p> <p>The Project is located in a developed urbanized area within the Town's Urban Growth Boundary. For the most part, development would be generally consistent with the height of these trees and would not be in excess of forest canopy (estimated at approximately 90' in height) in the general area. However, the towers and some portions of buildings on the sites may penetrate the existing forest canopy. Landscaping would incorporate some native trees and shrubs to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and</p>

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Policy	Consistency Discussion
	to soften building massing, and to introduce decoration and color into outdoor use areas. Planting on the Project site would use some native conifers, deciduous trees, and shrubs.
C.2.J Be stewards in preserving public views of surrounding mountains, ridgelines and knolls.	<p>Generally Consistent. As discussed in Section IV.B, Aesthetics, of this Draft EIR, the Project would partially block public views of the surrounding Mammoth Knolls from certain vantage points; however the Project would not significantly impact the most dominant views in the study area, which are of the Sherwin range to the south of the Project site. For the most part, scenic vistas are limited from the public areas surrounding the Project site and no other scenic views would be blocked.</p> <p>However, the location and massing of the proposed structures would be consistent with the Design Guidelines and the Specific Plan policies. Additionally, the Project includes revisions to the Zoning Ordinance. If those revisions are approved, the height and setbacks of the buildings would be consistent with the height limitation in the Town's Zoning Code.</p> <p>The Project would be consistent with the Specific Plan's intent to encourage visual variety, locate higher density at the edges of the pedestrian core, organize spaces around focal points, and provide distinctive architectural elements such as towers to convey their importance as major public destinations.</p>
C.2.L Create a visually interesting and aesthetically pleasing built environment by requiring all development to incorporate the highest quality of architecture and thoughtful site design and planning.	Consistent. See response to Policy C.2.I and C.2.J.
C.2.M Enhance community character by ensuring that all development, regardless of scale or density, maximizes provision of all types of open space, particularly scenic open space.	Consistent. The Project would cluster visitor lodging to allow areas of open, landscaped areas interspersed among commercial and resort uses, and recreational amenities. The Project's placement of sidewalks, and paths, and public plazas would aim to connect the open spaces within the Project area.
C.2.N Plan the siting and design of buildings to preserve the maximum amount of open space, trees and natural features to be consistent with themes and district character.	Consistent. The Project design would create a scale, form, and mass suited to the resort-alpine character of the site and the adjacent land uses. The Project would cluster development to preserve and maximize open, landscaped areas interspersed among commercial and resort uses, and recreational amenities. Specifically, the Project would cluster development along the edges of major streets to preserve and maximize open, landscaped areas on the interiors of Sites 1, 2, and 3. As part of the approval process, the Town will review the grading plans to assess the need for removal of any trees.

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Policy	Consistency Discussion
	<p>Existing mature trees along the edges of the Sites would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3. For the most part, development would be primarily consistent with the height of these trees and would not be in excess of forest canopy in the general area. However, the towers and some portions of buildings on the sites may be in excess of the existing forest canopy. Additionally the Town will review all landscaping plans to ensure that some native trees and shrubs are used to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas.</p> <p>See Response to Policy C.2.D, C.2.I, and C.2.L for discussions of consistency with district character.</p>
<p>C.2.O Site development adjustments may be considered to preserve significant groups of trees or individual specimens. Replanting with native and compatible non-native trees to mitigate necessary tree removal is required.</p>	<p>Consistent. See response to Policy C.2.N.</p>
<p>C.2.Q Design development so that public spaces contribute to an overall sense of security and lack of vulnerability to crimes of opportunity.</p>	<p>Consistent. Design for the Project would be consistent with traditional approaches for the region, would address current needs, codes, regulations, and environmental considerations; would enhance the user experience, safety, and enjoyment; and would contribute to adequate buffering as needed.</p>
<p>C.2.R Plan parks for safety and compatibility with adjacent uses through thoughtful design including location of buildings, lighting, parking, emergency access, public transit and pedestrian/ bicycle access.</p>	<p>Consistent. See response to Policy C.2.Q.</p>
<p>C.2.S Ensure that pedestrian facilities have adequate non-glare lighting, visible signage and markings for pedestrian safety.</p>	<p>Consistent. The proposed Project would include an Outdoor Lighting Plan to ensure compliance with the Town's Lighting Ordinance (Chapter 17.34 of the Municipal Code). Excessive illumination would be avoided and lighting would be designed and placed to minimize glare and reflection. The Project is subject to design review by the Town Community Development Department, which would consider the adequacy of signage and markings for pedestrian safety.</p>
<p>Distinctive Architecture</p>	
<p>C.2.T Use natural, high quality building materials to reflect Mammoth Lakes' character and mountain setting.</p>	<p>Consistent. See response to Policy C.2.C. and C.2.I.</p>

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Policy	Consistency Discussion
C.2.U Require unique, authentic and diverse design that conveys innovation and creativity and discourages architectural monotony.	Consistent. See response to Policy C.2.C. and C.2.I.
Comfortable Building Height, Mass, and Scale	
C.2.V Building height, massing and scale shall complement neighboring land uses and preserve views to the surrounding mountains.	Generally Consistent. See response to Policy C.2.J.
C.2.W Maintain scenic public views and view corridors (shown in Figures 1 and 2) that visually connect community to surroundings.	Generally Consistent. See response to Policy C.2.J.
C.2.X Limit building height to the trees on development sites where material tree coverage exists and use top of forest canopy in general area as height limit if no trees exist on site.	Generally Consistent. Existing mature trees along the edges of the Sites would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3. Some of the tower features and tallest portions of buildings on the sites may penetrate the existing forest canopy, or appear above the height of the tree canopy when viewed from certain perspectives. When considered across the entirety of the Project, and because the Project proposes to use of stepped building designs, and provide varied rooflines and articulation of heights, the Project, for the most part, would appear consistent with the height of the existing forest canopy in the general area.
Community Design and Streetscape	
C.3.B Require distinctive design features at unique sites such as mountain portals, the terminus of a public view and other important public spaces and social gathering places.	Consistent. The Town will review the location of the proposed structures, bulk/massing, use of building materials, colors, and landscaping to ensure consistency with the Town Municipal Code which strives to protect major view corridors and major landscape characteristics.
C.3.D Development shall provide pedestrian oriented facilities, outdoor seating, plazas, weather protection, transit waiting areas and other streetscape improvements.	Consistent. See response to Policy C.2.H., C.2.I. and C.2.C.
C.3.E Ensure that landscaping, signage, public art, street enhancements and building design result in a more hospitable and attractive pedestrian environment. Require an even higher level of design quality and detail in commercial mixed use areas.	Consistent. See response to Policy C.2.S. and C.2.N.
C.3.F Underground utilities within the community.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All utilities would be located underground and would be reviewed by the Town for consistency with Design Guidelines.

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Policy	Consistency Discussion
Natural Environment	
C.4.A Development shall be designed to provide stewardship for significant features and natural resources of the site.	Generally Consistent. See response to Policy C.2.J, C.2.N. and C.2.X.
C.4.B To retain the forested character of the town, require use of native and compatible plant species in public and private developments and aggressive replanting with native trees.	Consistent. See response to Policy C.2.N.
C.4.C Retain overall image of a community in a forest by ensuring that native trees are protected wherever possible and remain an important component of the community.	Consistent. See response to Policy C.2.N. and C.2.X.
C.4.D Retain the forested character of the town by requiring development to pursue aggressive replanting with native trees and other compatible species.	Consistent. See response to Policy C.2.N.
Night Sky, Light Pollution, and Glare	
C.5.A Require outdoor light fixtures to be shielded and down-directed so as to minimize glare and light trespass.	Consistent. See response to Policy C.2.S.
C.5.C Improve pedestrian safety by eliminating glare for motorists through use of non-glare roadway lighting. A light fixture's source of illumination shall not be readily visible at a distance. Number of fixtures used shall be adequate to evenly illuminate for pedestrian safety.	Consistent. See response to Policy C.2.S.
Quiet Community	
C.6.A Minimize community exposure to noise by ensuring compatible land uses around noise sources.	Consistent. As noted in Section IV.J, Noise, of this Draft EIR, the proposed residential uses within the Project site would not be exposed to traffic noise levels exceeding 70 dBA L_{dn} .
C.6.B Allow development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worstcase noise levels, either existing or future, with future noise levels to be predicted based on projected 2025 levels.	Consistent. The Project would be in compliance with the Town's noise ordinances.
C.6.C Development of noise-sensitive land uses shall not be permitted in areas where the noise level from existing stationary noise sources exceeds the noise level standards described in the Noise Element.	Consistent. See response to Policy C.6.B.
C.6.F Require mitigation of all significant noise impacts as a condition of project approval.	Consistent. See response to Policy C.6.B.
C.6.G Require preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all	Consistent. A noise analysis was prepared for the Project to ensure compliance with the Town's noise ordinances.

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Policy	Consistency Discussion
proposed projects that may result in potentially significant noise impacts.	
NEIGHBORHOOD AND DISTRICT CHARACTER	
North Village	
<p>The North Village District, in the northwest portion of town adjacent to Main Street, Lake Mary Road, and Minaret Road, is primarily comprised of more urban development. It includes hotels, restaurants, visitor-oriented and general commercial operations, professional and medical offices, condominiums, single family homes and community facilities. The North Village is an intensely focused entertainment district. It should incorporate active open pedestrian plazas showcasing mountain views with retail, entertainment, and public art including local talent.</p> <p>North Village characteristics:</p> <ol style="list-style-type: none"> 1. Viewsheds to Sherwin Range and the Knolls are preserved 2. Landscape that recalls the Eastern Sierra and establishes scale and street edge 3. Create a sense of exploration using pedestrian-oriented sidewalks, plazas and courtyards with pedestrian comforts 4. Easy pedestrian access across main streets 5. Gateway intersection at Minaret Road and Main Street/Lake Mary Road 6. Visitor-oriented entertainment retail district 7. Active day and evening through all four seasons, designed to achieve a 2-3 hour visit 8. Resort and resident activities, amenities and services 9. Animation with retail and significant businesses oriented to the street 10. Retail and services in “storefront” setting located at the sidewalk 11. A variety of resort lodging supported by meeting facilities, outdoor activities and restaurants, arts, culture and entertainment 12. Create year-round non-vehicular links to mountain portals 13. Lake Mary Road connected to the North Village District by trails 14. Shared and pooled parking, convenient structured parking and small-scale street adjacent surface parking 15. Encourage living and working in close proximity to transit-oriented development 	<p>Generally Consistent. The Project, as described in detail in Section III, Project Description, of this Draft EIR, would include elements consistent with nearly all the characteristics proposed in the North Village policy by creating a pedestrian-oriented development, contributing to a gateway intersection at Minaret Road and Main Street/Lake Mary Road, and providing resort and resident amenities. The Project design would create a scale, form, and mass suited to the resort-alpine character of the site and the adjacent land uses. The Project would complement the design of the existing North Village Specific Plan area by being consistent with design for the area, proposing land uses in an efficient fashion, and contributing to the resort environment of the Town. The Project would provide pedestrian and bicycle connections to the North Village and Gondola building, and tying into the larger Town-wide recreational trail network for both existing and future sidewalks and paths. Public outdoor spaces would be designed to connect community members and allow for community activities including activities such as art fairs or farmers’ markets. The Project proposes redevelopment of three of the four corners that comprise the Main Street-Lake Mary Road/Minaret Road intersection with a combination of resort accommodations, retail uses, and public spaces. However, while viewsheds to the Sherwin Range are not blocked, as noted in Section IV.B, Aesthetics, of this Draft EIR, the Project would block views to the Mammoth Knolls from Lake Mary Road near the Project site looking east (View 6) and Minaret Road looking north (View 8).</p> <p>See response to Policy C.2.A, C.2.D, C.2.E, C.2.G, C.2.J, C.2.V, and C.2.W.</p>

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Policy	Consistency Discussion
LAND USE	
Livability	
L.1.A Limit total peak population of permanent and seasonal residents and visitors to 52,000 people.	Consistent. As discussed detail in Section IV.K, Population and Housing, of this Draft EIR, the Persons At One Time (PAOT) is used as the Town's threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. Actual build-out population would depend on the types and density of units actually developed and not all properties are likely to develop at the maximum density. Although the 2005 General Plan Update Final Program EIR (May 2007) analyzes a maximum PAOT to be 60,700, this policy limits total peak population of permanent and seasonal residents and visitors to 52,000. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation (the Project and related projects) would not exceed the anticipated PAOT of 52,000.
L.1.B Require all development to meet community goals for highest quality of design, energy efficiency, open space preservation, and promotion of a livable, sustainable community. Development that does not fulfill these goals shall not be allowed.	Consistent. As described in the 2007 General Plan policies for the North Village, the Project would incorporate landscaping appropriate to the Eastern Sierra context, would create a pedestrian- and transit-oriented development and encourage year round non-vehicular links to mountain portals, and contribute to a gateway intersection at Minaret Road and Main Street/Lake Mary Road. Additionally, the Project would preserve many existing mature trees on the site and would cluster development along the edges of the Sites to preserve open space. Development of these uses in proximity to the Gondola, retail and commercial uses, and transit would contribute to a livable and sustainable community.
L.1.C Give preference to infill development.	Consistent. The Project is part of the North Village Specific Plan area located in the center of Town and could be considered as infill development.
L.1.D Conduct district planning and focused studies for special areas and sites within the community to aid in future planning.	Consistent. The Project is part of the North Village Specific Plan area. The Town is undertaking the District Planning Study to be undertaken for the North Village area to study the proposed Project and its relationship to the context and character of the Specific Plan area. Therefore, with the completion of this process, the Project is consistent with this policy.

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Policy	Consistency Discussion
Housing	
L.2.A Emphasize workforce housing for essential public service employees, such as firefighters, police, snow removal operators, and teachers.	Consistent. The Project proposes 66 on-site and 27 off-site affordable housing units and would comply with the Affordable Housing Mitigation Regulations. The Project shall be required to provide housing for the estimated 185 fulltime equivalent employees (FTEE) associated with the Project.
L.2.B Encourage a mix of housing types and forms consistent with design and land use policies.	Consistent. The Project primarily proposes visitor lodging consistent with the North Village Specific Plan, but also proposes 95 units of affordable housing.
L.2.C Rehabilitate existing housing and build new housing for workforce housing.	Consistent. As discussed in Section IV.K, Population and Housing, of this Draft EIR, 18 residential units would be removed and 24 market-rate permanent year-round residential housing units, and 66 on-site and 27 off-site affordable housing units would be constructed as part of the Project.
Small Town Character	
L.3.A Achieve a diversity of uses and activities and efficient use of land by maintaining a range of development types.	Consistent. The Project would develop a variety of resort lodging, including restaurants, resort services, neighborhood conveniences, activities, and outdoor recreation that would attract visitors during the day and evening and through all four seasons. See response to Policy C.2.C., C.2.I., and Neighborhood and District Character.
L.3.B Develop vital retail centers and streets.	Consistent. See response to Policy L.3.A.
L.3.C Encourage development of small neighborhood-serving retail and services dispersed through town.	Consistent. See response to Policy C.2.C., C.2.I., and Neighborhood and District Character.
L.3.D Encourage outdoor dining in resort and commercial districts to increase street level animation.	Consistent. See response to Policy C.2.B., and Neighborhood and District Character discussion.
L.3.F Ensure appropriate community benefits are provided through district planning and development projects.	Consistent. The Project would be consistent with the North Village Specific Plan district planning goals and would locate visitor lodging within the North Village, an area of concentrated, pedestrian-oriented activity center with limited vehicular access. Development would be oriented toward year-round uses and visitor activity to strengthen the existing winter visitor market and to improve the Town's attractiveness to spring, summer, and fall resort visitors. Specifically, the Project would create visitor services and attractions, while emphasizing pedestrian access and mobility.
L.3.H Density may be clustered or transferred within clearly articulated district, master, and specific plans to enhance General Plan goals and policies. Development rights may also be transferred between districts when that transfer furthers protection of identified environmentally	Consistent. The Project does not propose any transfer of unused density, or to re-assign density from other parts of the North Village Specific Plan area to accommodate its proposed densities. However, the Project does provide a concentration of density on its three sites, which would exceed the density allowed under the

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sensitive areas.	existing Specific Plan zoning. Site 1 is zoned as Resort General (RG), which allows for 55 rooms per acres, not to exceed an aggregate density of 48 rooms per acre for the entire RG district. The density of development on Site 1 would be 110 rooms/acres. Sites 2 and 3 are zoned as Specialty Lodging (SL), which allows for 48 rooms per acre. Development on Site 2 would be 81 rooms/acre and 61 rooms/acre on Site 3.
Accommodations and Community Amenities	
L.5.A Encourage and support a range of visitor accommodations that include a variety of services and amenities.	Consistent. The Project is consistent with the underlying concepts expressed in this policy of providing visitor housing and recreation amenities. The Project proposes areas of commercial development including 109,650 square feet of non-residential space including retail uses, restaurant, and conference and meeting space.
L.5.B Locate visitor lodging in appropriate areas.	Consistent. The Project would locate visitor lodging within the North Village, an area of concentrated, pedestrian-oriented activity center with limited vehicular access. Development would be oriented toward year-round uses and visitor activity to strengthen the existing winter visitor market and to improve the Town's attractiveness to spring, summer, and fall visitors. The Project would create visitor services and attractions, while emphasizing pedestrian access and mobility.
L.5.C Ensure there are an adequate number of units available for nightly rental.	Consistent. The Project would include the construction of three hotels (including 742 condominium/hotel rooms).
L.5.E Development shall complement and diversify the range of resort community activities and amenities.	Consistent. See response to Policy L.5.A.
L.5.F Require all multi-family, resort, and specific plan development to include activities, amenities and services to support long-term visitation.	Consistent. See response to Policy L.5.A.
MOBILITY	
Regional Transportation	
M.2.A Maintain and expand access to recreation areas via coordinated system of shuttle and bus services, scenic routes, trails and highways.	Consistent. The Project is located within walking distance of the Village Gondola allowing access to Mammoth Mountain, a major recreation area. The Project area is currently served by bus and shuttle services operated by the Town and by Mammoth Mountain Ski Area, which would serve to connect the Project to other recreation and amenities in the Town. Existing bus stops and shelters would be maintained and additional transit stops and shelters would be provided to meet Town Mobility Planning requirements. In addition, all three Project hotels would provide shuttle services around Town and to the Mammoth Yosemite Airport. The Project includes a pedestrian system that would

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	connect to proposed buildings and open space areas and to other Town pathways to create safe continuous routes.
In-Town Transportation	
M.3.A Maintain a Level of Service D or better on the Peak Design Day at intersections along arterial and collector roads.	Consistent. No Project-specific mitigation measures are required. However, the Project will contribute to Developer Impact Fees (DIFs) as required by the Town and as part of the Project Conditions of Approval. Implementation of the mitigation measure proposed in the General Plan Update would be required in order to improve cumulative plus Project LOS to an acceptable LOS D and to reduce cumulative plus Project impacts on the study area street system to a less than significant level.
M.3.B Reduce automobile trips by promoting and facilitating: <ul style="list-style-type: none"> • Walking • Bicycling • Local and regional transit • Innovative parking management • Gondolas and trams • Employer-based trip reduction programs • Alternate work schedules • Telecommuting • Ride-share programs • Cross-country skiing and snowshoeing 	Consistent. The Project is consistent with this policy by including pedestrian and bicycle sidewalks and paths. The pedestrian sidewalks/paths would create internal pedestrian connections within the Project site and connect to existing and future Town sidewalks/paths. The bicycle paths/lanes would connect with Town bikeways to create safe continuous routes. The Project site is currently served for transit by Mammoth Lakes Transit Red Line. Bus stops and shelters would be located near the Project site. Additionally, the Project is located adjacent to the Gondola allowing access to Mammoth Mountain a major recreation area.
M.3.C Reduce automobile trips by promoting land use and transportation strategies such as: implementation of compact pedestrian-oriented development; clustered and infill development; mixed uses and neighborhood-serving commercial mixed use centers.	Consistent. The Project proposes infill development by redeveloping existing low-level land uses with more intense hotel, residential, commercial, and retail development. The Project would encourage reduction in automobile trips by developing lodging and residential uses in a pedestrian-oriented atmosphere and adjacent to neighborhood-serving commercial uses and access to the Mammoth Mountain via the Gondola. The Project would be located adjacent to an existing transit network, would include the provision of shuttle services, and would provide pedestrian and bicycle facilities to encourage the use of alternative transportation modes.
M.3.D Encourage visitors to leave vehicles at their lodging by developing pedestrian, bicycle, transit and parking management strategies.	Consistent. See response to Policy M.3.B and M.3.C.
M.3.E Require development to implement Transportation Demand Management (TDM) measures.	Consistent. The Project would include TDM measures such as pedestrian and bicycle facilities and transit service and facilities (e.g., stops and shelters).
M.3.F Encourage the school district, ski resort and other major public and private traffic generators to develop and implement measures to change travel behavior.	Consistent. See response to Policy M.3.B, M.3.C., and M.3.E. Additionally, the Project would be located adjacent to the Gondola allowing visitors access to recreational activities without using automobiles.

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M.3.G Construction activities shall be planned, scheduled and conducted to minimize the severity and duration of traffic impediments.	Consistent. As a condition of approval, Project construction activities shall be planned and scheduled and will be limited to set hours.
M.3.H Commercial developments shall not allow delivery vehicles and unloading activity to impede traffic flow through adequate delivery facilities and/or delivery management plans.	Consistent. Service vehicles would be routed and managed to minimize conflicts with the Project's visitor activities and local traffic. All buildings would be serviced from internal roadways. Service areas would be designed to accommodate required service vehicle sizes.
Walking and Bicycling	
M.4.A Improve safety of sidewalks, trails and streets.	Consistent. The Project proposes various improvements to adjacent roadways. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed internal access and pedestrian and bicycle facility system would be reviewed by the Town to ensure that a safe movement of people is maintained.
M.4.B Provide a high quality pedestrian system linked throughout the community with year-round access.	Consistent. The Project would include a pedestrian system throughout that would provide access to the Gondola and other Project amenities in addition to interconnecting the Sites. The Project is pedestrian oriented and would include pedestrian connections to existing Town pedestrian pathways to create safe continuous routes.
M.4.C Design streets, sidewalks and trails to ensure public safety such as: <ul style="list-style-type: none"> • adequate dimensions and separation • glare-free lighting at intersections • directional and informational signage • trash receptacles • benches • shuttle shelters • protected roadway crossings • landscaping • groomed community trails • snow removed from sidewalks 	Consistent. The Project proposes various improvements to adjacent roadways and would include pedestrian and bicycle facilities. Project paths and sidewalks would be lit, signed, and would include landscaping. In addition, the Project would include trash receptacles, benches, and shuttle shelters.
M.4.D Provide safe travel for pedestrians to schools and parks.	Consistent. The Project is consistent with this policy by including a pedestrian trail system that would connect to the Town's existing multi-use paths/sidewalks and future planned paths/sidewalks to create safe continuous routes.
M.4.E Development shall improve existing conditions to meet Town standards.	Consistent. The Project proposes various improvements to existing adjacent roadways. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies.
Transit System	
M.5.A Expand and increase reliability of transit service to meet the needs of the community and visitors.	Consistent. The Project would be required to pay an annual Transit and Transportation Fee to the Town as

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	part of the Conditions of Approval. Existing bus stops and shelters would be maintained and additional transit stops and shelters would be provided on Lake Mary Road. Additionally, all three Project hotels would provide shuttle services around Town as well as the Mammoth Yosemite Airport, which would help to expand transit service in the Town.
M.5.B Encourage transit use by requiring development and facility improvements to incorporate features such as shelters, safe routes to transit stops, and year-round access.	Consistent. Bus stops and shelters would be located at appropriate areas of the Project site. Design, location and implementation will be reviewed and approved by the Town.
M.5.C Increase availability of transit services by working collaboratively with other agencies and organizations.	Consistent. The Project area is currently served by bus and shuttle services operated by the Town and by Mammoth Mountain Ski Area. Existing bus stops and shelters would be maintained and additional transit stops and shelters would be provided on Lake Mary Road just west of Minaret Road. In addition, all three Project hotels would provide shuttle services around Town as well as the Mammoth Yosemite Airport.
Parking	
M.6.A Develop efficient and flexible parking strategies to reduce the amount of land devoted to parking.	Consistent. The Project proposes minimal surface parking with the bulk of parking provided as understructure parking. To minimize the need for parking, the Project also provides for bus stops, shuttles, includes visitor-serving services, as well as pedestrian paths and sidewalks.
M.6.B Support development of strategically located public parking facilities.	Consistent. Site 3 would provide 100 parking spaces for use by the general public.
Streets	
M.7.A Install traffic control and safety operational improvements at intersections on arterial roads as required to meet the above Levels of Service.	Consistent. No Project-specific mitigation measures are required. However, the Project will contribute to Developer Impact Fees (DIF) as required by the Town and as part of the Project Conditions of Approval. Implementation of the mitigation measure proposed in the General Plan Update EIR would be required in order to improve cumulative plus Project LOS to an acceptable LOS D and to reduce cumulative plus Project impacts on the study area street system to a less than significant level.
M.7.C Improve substandard roadways to Town standards.	Consistent. See response to Policy M.4.E, M.4.A, and M.7.A.
M.7.D Monitor impact of development on local and regional traffic conditions and roadway network to plan for future improvements in the network.	Consistent. A traffic impact analysis was prepared for the Project to assess potential impacts to roadways. As discussed in Section IV.M, Traffic and Circulation, of this Draft EIR, a monitoring program would be implemented on an annual (typical winter Saturday) basis to document effective hotel unit trip generation. The monitoring report would include an actual trip count (not

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	estimated) and would be submitted to the Town on an annual basis. The Project would contribute fair share funding for improvements to accommodate future traffic.
M.7.E Require all development to construct improvements and/or pay traffic impact fees to adequately mitigate identified impacts. Mitigation of significant project-related impacts may require improvements beyond those addressed by the current Capital Improvement Program and Town of Mammoth Lakes Air Quality Management Plan and Particulate Emissions Regulations.	Consistent. See response to Policy M.7.A.
M.7.H Development shall dedicate, design and construct internal and adjacent streets, sidewalks and trails to Town standards.	Consistent. The Project internal access roads will be privately owned and maintained consistent with the Town Development Code, in consideration of the climatic extremes of the region.
Traffic Calming	
M.8.C Improve pedestrian traffic and roadway circulation affected by snow storage by increasing shoulder width and building sidewalks and trails along State Route 203, Minaret Road, Meridian Boulevard, and Old Mammoth Road.	Consistent. The Project proposes improvements to State Route 203 (i.e., Minaret Road north of Main street) and Minaret Road (south of Main Street) to improve pedestrian circulation, in accordance with the Town's adopted plans.
Snow Management	
M.9.A Require snow management methods that minimize environmental damage while optimizing road and pedestrian safety.	Consistent. The Project would incorporate snow management devices and roof drainage systems in the roof and building design, so that pedestrian paths and walkways would be kept free of snow, and so that snow will not be permitted to shed freely into active pedestrian or vehicular areas.
M.9.B Increase year-round pedestrian access to sidewalks and transit stops.	Consistent. See response to Policy M.9.A.
M.9.C Support development of geothermal and solar heating opportunities for snow removal.	Consistent. The Project applicant is exploring the use of geothermal heating opportunities for both heating and snow removal.
PARKS, OPEN SPACE, AND RECREATION	
A Town Within a Park	
P.2.C Maximize parks and open space through flexible form-based zoning, development clustering and transfers of development rights within individual districts.	Consistent. The Project would cluster development on the Project site to maximize open space areas on Sites 2 and 3.
Recreational Opportunities	
P.4.A Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.	Consistent. Although the Project would not develop any public agency and private partnerships, the Project would include multi-use paths (bicycle, walking/running), spa/wellness center, and provide access to Mammoth Mountain via the Gondola.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
<p>P.4.B Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors. Activities include but are not limited to:</p> <ul style="list-style-type: none"> • downhill skiing & snowboarding • day & backcountry hiking • cross-country skiing • walking • back-country skiing & snowboarding • interpretive trails & signage • snowshoeing • climbing • sledding • touring • dog sledding • street & mountain biking • ice skating • camping • snowmobiling • fishing • sleigh rides • fall-color viewing • tennis • birding • swimming • health & fitness • soccer • off-highway vehicles • racquetball • equestrian activities • snow play • BMX • skateboarding 	<p>Consistent. The Project would include multi-use paths (bicycle, walking/running), spas, pools and provide access to Mammoth Mountain via the Gondola. The Project would contribute access to affordable and year-round recreation in the Town.</p>
<p>P.4.C Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.</p>	<p>Consistent. The Project would include non-motorized recreation, including multi-use paths (bicycle, walking/running), and provide access to Mammoth Mountain via the Gondola. The Project would contribute to non-motorized modes of recreation in the Town.</p>
Connected Throughout	
<p>P.5.A Create open space corridors by combining open space on neighboring properties.</p>	<p>Consistent. The Project proposes clustered development to allow for the connection of open space with properties neighboring Sites 2 and 3.</p>
<p>P.5.B Design and construct trails as components of a regional and local network for recreation and commuting.</p>	<p>Consistent. The Project would include a bicycle and pedestrian system that would connect to existing Town bikeways to create safe continuous routes.</p>

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
P.5.C Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.	Consistent. See response to Policy P.5.B.
P.5.D Design public and private streets not only as connections to different neighborhood districts but also as an essential element of the open space system. Include parks and plazas, treelined open spaces and continuous recreational paths in design.	Consistent. The Project does not include any public or private streets. However, the proposed pedestrian and bicycle facility system would be reviewed by the Town to ensure that streets are an essential element of the open space system and include areas of tree-lined open spaces and a continuous recreational path.
P.5.E Design parks and open space to be accessible and usable except when set aside for preservation of natural resources, health and safety.	Consistent. The Project does not include any Town parks. However, the Project does include public plazas and is designed to enhance and complement recreational opportunities already available in the Town. Additionally, park-like and open space areas on the Project site would be accessible. The Project includes “stand alone” recreational amenities such as swimming, workout facilities, and spa
P.5.F Ensure provision of parkland dedications or payment of in-lieu fees through project approvals or development impact fees.	Consistent. The Project’s proposed recreational and public amenities, in conjunction with the Town’s current facilities, and the collection of Developer Impact Fees would be adequate to accommodate the Project-created demand for recreational services.
RESOURCE MANAGEMENT AND CONSERVATION	
Habitat Resources	
R.1.A Be stewards of important wildlife and biological habitats within the Town’s municipal boundary.	Consistent. The Project site has been surveyed for sensitive species and the Project would not impact rare, unique, or endangered species. Implementation of mitigation measures for pre-construction surveys and tree removal permits as described in Section IV.B, Biological Resources, of this Draft EIR would maintain this impact at a less than significant level.
R.1.B Development shall be stewards of Special Status plant and animal species and natural communities and habitats.	Consistent. See response to Policy R.1.A.
R.1.C Prior to development, projects shall identify and mitigate potential impacts to site-specific sensitive habitats, including special status plant, animal species and mature trees.	Consistent. See response to Policy R.1.A.
R.1.D Be stewards of primary wildlife habitats through public and/or private management programs. For example, construction of active and passive recreation and development areas away from the habitat.	Consistent. See response to Policy R.1.A.
R.1.I Encourage the management of forest resources in and adjacent to the Town to ensure forest health, minimize insect and pathogen outbreaks, and reduce fuel loading	Consistent. See response to Policy R.1.A.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
R.1.J Live safely with wildlife within our community.	Consistent. See response to Policy R.1.A.
Healthy Ecosystem	
R.2.A Trash enclosures, receptacles and food storage areas shall be animal resistant.	Consistent. The Project would incorporate animal resistant trash enclosures, receptacles and food storage areas.
R.2.B Be stewards of forested areas, wetlands, streams, significant slopes and rock outcroppings. Allow stands of trees to continue to penetrate the community to retain the mountain character of Mammoth Lakes. Minimize tree removal for development to the greatest extent possible.	Consistent. Landscaping would incorporate some native trees and shrubs to revegetate disturbed areas, to preserve the resort-alpine character of the Town. Planting on the Project site would use native conifers, deciduous trees, and shrubs. Some trees on the site may meet the minimum size (six inches in diameter) to require approval from the Town prior to removal. However, implementation of mitigation measures as described in Section IV.B, Aesthetics, and Section IV.D, Biological Resources, of this Draft EIR would reduce this impact to less than significant.
Water Resources	
R.4.B Support and encourage water conservation and recycled water use within private and public developments.	Consistent. Project landscaping will include drought resistant designs and planting and would conform to the Town's adopted water-efficient landscape regulations. Additionally Mammoth Community Water District policies regarding water conservation will be followed.
R.4.C Require drought-tolerant landscaping and water-efficient irrigation practices for all development and Town-maintained landscaped areas, parks and park improvement projects. Development design, including parks, may include limited turf as appropriate to the intended use.	Consistent. See response to Policy R.4.B.
R.4.D Require development to use native and compatible non-native plants, especially drought-resistant species, to greatest extent possible when fulfilling landscaping requirements.	Consistent. See response to Policy R.4.B.
R.4.E Limit use of turf over root zones of native trees to avoid or minimize adverse impacts of excessive water to native trees.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project landscaping would be drought resistant and would conform to the Town's adopted water-efficient landscape regulations. Additionally Mammoth Community Water District policies regarding water conservation would be followed.
Erosion and Sedimentation	
R.5.A Wisely manage natural and historic drainage patterns.	Consistent. The Project would require grading on the site. Sites 1, 2, and 3 are previously developed and there are no natural or historic drainage patterns on the site. Site 4 is currently undeveloped. However, the Project would incorporate measures as described by the Lahontan Regional Water Quality Control Board

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	(Lahontan RWQCB) during and after construction to manage runoff from the Project site.
R.5.B Require parking lot storm drainage systems to include facilities to separate oils and silt from storm water where practical and when warranted by the size of the project.	Consistent. The Project will follow the Lahontan RWQCB guidelines for drainage and water retention facilities.
R.5.C Prevent erosion, siltation, and flooding by requiring use of Best Management Practices (BMPs) during and after construction.	Consistent. The proposed Project will follow the Lahontan RWQCB Best Management Practices (BMPs) and guidelines during and after construction.
Energy Resources	
R.6.A Reduce energy demand by promoting energy efficiency in all sectors of the community.	Consistent. The Project would incorporate energy conserving materials, systems, and appliances including, planting native, drought tolerate landscaping, incorporating energy efficient appliances in the buildings, and conforming to Town ordinances for recycling..
R.6.C Encourage energy efficiency in new building and retrofit construction, as well as resource conservation and use of recycled materials.	Consistent. See response to Policy R.6.A.
Green Technology	
R.7.A Use green building practices to greatest extent possible in all construction projects.	Consistent. See response to Policy R.6.A.
R.7.B Encourage development of housing close to work, commercial services, recreation areas and transit routes to reduce fuel consumption.	Consistent. The Project would include mixed-uses including affordable residential uses adjacent to commercial services and recreation areas. The Project would include provisions for transit and shuttle service. The Project would include bus stops and shelters as identified by the Town's Mobility Planning process as deemed necessary per the existing conditions at the time of Project development.
Solid Waste	
R.9.A Support programs to recycle materials such as paper, cardboard, glass, metal, plastics, motor oil; and programs to compost or chip for mulch tree cuttings, brush, and other vegetation.	Consistent. The Project would incorporate the Town's recycling program, thereby diverting solid waste from the landfill.
Air Quality	
R.10.A Support regional air quality improvement efforts.	Consistent. As discussed in Sections IV. C, Air Quality, and IV.M, Transportation, the proposed Project would include mixed uses, which would include some retail, commercial, and visitor-serving uses. The Project includes in-Town workforce housing in proximity to retail and commercial services. The Project would be located near public transportation stops and would include a shuttle, as well as a pedestrian connections to encourage the use of alternative modes of transportation. The Project is located adjacent to the Gondola, a mountain portal. All these measures would advance shopping locally and using alternative modes of

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	transportation to access commercial and retail needs, which would result in a reduction of vehicle trips that would support the implementation of regional air quality goals.
<p>R.10.B Promote land use patterns that reduce number and length of motor vehicle trips, including:</p> <ul style="list-style-type: none"> • development of in-town workforce housing • residential and mixed use development adjacent to commercial centers • mountain portals and transit corridors • provision of a mix of support services in employment areas 	Consistent. See response to Policy R.10.A.
<p>R.10.C Support strategies for development that reduce projected total vehicle miles traveled including, but are not limited to:</p> <ul style="list-style-type: none"> • circulation system improvements • mass transit facilities • private shuttles • design and location of facilities to encourage pedestrian circulation 	Consistent. See response to Policy R.10.A.
<p>R.10.D Mitigate impacts on air quality resulting from development through design, participation in Town air pollution reduction programs, and/ or other measures that address compliance with adopted air quality standards.</p>	Consistent. See response to Policy R.10.A.
<p>R.10.E Reduce air pollutants during construction through implementation of Best Management Practices (BMPs).</p>	Consistent. The Project would incorporate BMPs during construction to reduce air pollutant emissions.
<p>R.10.F Develop an efficient transportation system to reduce CO2 emissions and air pollutants.</p>	Consistent. The Project emphasizes pedestrian access and mobility. As such, the Project is pedestrian oriented and would include pedestrian connections to existing Town pedestrian pathways to create safe continuous routes.
<p>R.10.G Reduce PM-10 emissions resulting from excessive accumulations of cinders and dirt on roadways.</p>	Consistent. The control of dust and cinders in winter is achieved through the Town's street sweeping program. The Project would be required to pay their fair share of developer impact fees that, in part, fund the street sweeping program. In addition, as previously stated the Project applicant is exploring the use of geothermal heating opportunities for both heating and snow removal to reduce PM ₁₀ emissions resulting from crushed cinder and dirt.
<p>R.10.H No solid fuel burning appliances will be installed within any multi-unit development.</p>	Consistent: Per Town requirements, the Project would be limited to a maximum of one solid fuel burning appliance in each hotel facility. Individual rooms and

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	units would not include any solid fuel burning appliances.
R.10.L Mitigation of significant project-related impacts may require improvements beyond those addressed by the current Capital Improvement Program and Town of Mammoth Lakes Air Quality Management Plan and Particulate Emissions Regulations.	Consistent. As discussed in Section IV.C, Air Quality, of this Draft EIR, the Project would implement Mitigation Measure AQ-2 Operational Emissions to reduce the significant impacts associate with the level of respirable particulate emissions (PM ₁₀).
R.11.A Support the objectives of the U.S. Mayors Climate Protection Agreement, Assembly Bill 32, and California Executive Order S-03-05 and implement actions to reduce Mammoth Lakes' carbon footprint.	Consistent. As discussed in Section IV.C, Air Quality, of the Draft EIR, greenhouse gas emissions were estimated using procedures similar to those for criteria pollutants and the Project would be consistent with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies.
PUBLIC HEALTH AND SAFETY	
Police Enforcement	
S.2.B Ensure effective code enforcement and policing programs.	Consistent. As discussed in Section IV.L, Public Services, of this Draft EIR, with implementation of mitigation measures recommended by the Mammoth Lakes Police Department (MLPD), the MLPD would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
S.2.D Increase public access to police services.	Consistent. See response to Policy S.2.B.
Hazards - Snow Management	
S.3.A Design all structures in Mammoth Lakes to withstand snow loads and to reduce any additional hazards created by snow accumulation.	Consistent. The Project would be designed to current Town Municipal Code to withstand snow loads. The Project would incorporate snow management devices and roof drainage systems in the roof and building design, so that snow will not be permitted to shed freely into active pedestrian or vehicular areas.
S.3.B Design buildings so that snow shed, ice shed and snowmelt are not a hazard to people and property.	Consistent. See response to Policy S.3.A.
S.3.C All developments shall provide and maintain adequate on-site snow storage or maintain a Town-approved snow-hauling program.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for snow management including areas adjacent to driveways and parking areas, ground level snow storage, and landscape snow shed areas. Ground and roof level snow storage areas would be identified. Landscape snow shed areas would be designated and located adjacent to the base of buildings and would be sized to accommodate the anticipated volumes of snow. Roof forms would be designed in coordination with pedestrian areas at the base of buildings. Snow falling from roofs would be directed

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
	to landscaped areas at the base for the buildings or to lower level flat roofs. The management of snow at the Project site would be the sole responsibility of the property owners.
S.3.D Maintain safe public access and circulation through comprehensive snow removal programs provided by the Town or by private entities.	Consistent. See response to Policy S.3.C.
Hazards - Avalanche	
S.3.E Development shall mitigate potential avalanche hazards.	Consistent. As discussed in Section IV.F, Geology and Soils, of this Draft EIR, no evidence of past landslides has been observed on the Project site.
Hazards - Geologic and Seismic	
S.3.H Restrict development in areas with steep slopes.	Consistent. The Project would not be located on areas of steep slopes.
S.3.I Require geotechnical evaluations and implement mitigation measures prior to development in areas of potential geologic or seismic hazards.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project would be designed in conformance with the recommendations contained in the Geotechnical Report and to current California Building Code (CBC) requirements, which will reduce the potential for structures on the Project site to sustain damage during an earthquake event.
Hazards - Flood	
S.3.K Restrict development in flood areas and near perimeter of natural water bodies.	Consistent. The Project is not located within a flood zone.
Fire	
S.3.L All construction shall comply with wildland fire-safe standards, including standards established for emergency access, signing and building numbering, private water supply reserves available for fire use, and vegetation modification.	Consistent. The Project design has been reviewed by the Mammoth Lakes Fire Protection District and would conform to design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan.
S.3.M Involve local fire department in the development review process.	Consistent. See response to Policy S.3.L.
S.3.N Minimize the incidence of fires by supporting the Mammoth Lakes Fire Protection District's (MLFPD) ability to respond to emergencies.	Consistent. As described in Section IV.K, Public Services, of the Draft EIR, the Project would not require the need for new staff or new or altered fire protection facilities.
S.3.O Support provision of adequate water flow throughout the town and provision of adequate water storage to meet peak fire demand during times of peak domestic demands.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Town would review the Project for conformance with the design and fire suppression standards and requirements as provided in the Mammoth Lakes Fire Protection District Plan.

**Table IV.I-2
Comparison of Project Characteristics to Applicable Policies in the General Plan**

Policy	Consistency Discussion
Hazards - Hazardous Materials	
S.3.R Provide for safe use and disposal of hazardous materials.	Consistent. Project uses include resort, affordable housing, commercial, and retail uses. A small amount of everyday chemicals would be used including solvents and cleaners. These materials would be disposed of in compliance with all hazardous waste regulations.
S.3.S Require a Hazardous Materials Disclosure form from all development.	Consistent. The Project developer would be required to submit a Hazards Materials Disclosure form during both construction and operation of the Project.
Emergency Preparedness	
S.4.B Maintain an Emergency Plan.	Consistent. The Project would include the preparation of emergency plans.
S.4.C Cooperate with emergency response agencies to maintain preparedness to respond to all types of emergencies.	Consistent. The Project design has been reviewed by the Mammoth Lakes Fire Protection District and would conform with design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan. Additionally, the Town of Mammoth Lakes Police Department has been contacted to verify that it would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
Education	
S.5.A Encourage development and enhancement of school sites and other administrative, educational and recreational facilities.	Consistent. As discussed in Section IV.K, Public Services, of this Draft EIR, the Project applicant is required to pay school developer fees levied by the Town pursuant to Section 17620 of the California Education Code.
S.5.B Support expansion of educational opportunities within the community.	Consistent. See Response to Policy A.2.D and P.2.D.

As previously stated, the Specific Plan designation contains land use districts indicating site-specific land use designations for individual parcels. Site 1 is zoned as Resort General (RG) and Sites 2 and 3 are zoned as Specialty Lodging (SL) in the Specific Plan. The Specific Plan also contains development and design standards describing density, site coverage, building area and heights, building setbacks, and other building design specifications.

Table IV.I-3 compares the Project characteristics with all applicable policies outlined in the Specific Plan as they relate to land use issues. Specific Plan policies related to aesthetics and visual resources are presented in Section IV.B, Aesthetics, of this Draft EIR. While some policies overlap in both Sections IV.I (Land Use) and IV.B (Aesthetics) of this Draft EIR, the policy consistency analysis for each Section has been prepared to reflect the intent of the policy/standard as it relates to either "land use" or "visual resources," respectively.

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
Overall Land Use Policies	
1 Development in the North Village Specific Plan Area shall reflect anticipated market needs and public demand by providing a variety of lodging, commercial, and recreational services. A large number of rooms will be available for transient occupancy.	Consistent. The Project would provide hotels, restaurants, visitor-oriented and retail operations, and condominiums. The Project would be built in three phases facilitating development of Project components relevant to current market needs and public demand. Out of the Project's 742 rooms, 694 would be available as transient occupancy.
2 Site-specific development plans shall be sensitive to physical and environmental constraints as well as opportunities created by existing conditions.	Consistent. Based on the conceptual development plans for the proposed Project the buildings would be clustered and arranged in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. Environmental constraints on the Project sites include the sloping terrain and the existing mature trees along the edges of the Project sites. These trees would be retained for the most part, especially along the northern edge of Site 1, southern edge of Site 2, and western edge of Site 3 in compliance with Town Municipal Code Chapter 17.16.050 "Grading and Clearing" which requires the preservation of existing trees and vegetation. The natural topography in the area slopes downward to the south and southwest with the highest elevation being on Site 1 (8,045 elevation) and the lowest elevation being on Site 3 (7,990 elevation). The height of buildings on Site 3 (lowest elevation) would not exceed the height of buildings on Site 1 (highest elevation); therefore the Project would blend with the natural topography. Project site elevations are illustrated on Figures III-5 (Site 1), Figure III-8 (Site 2) and Figure III-11 (Site 3) in Section III, Project Description, of this Draft EIR. See response to General Plan Policy C.2.N.
3 High architectural standards shall be used throughout the North Village Specific Plan Area to create the desired image and promote cohesiveness among development.	Consistent. The Project would cluster buildings in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. See response to General Plan Policy C.2.F, C.2.I. and C.2.L.
5 All development projects shall adhere to proper construction procedures concerning grading and revegetation.	Consistent. The Project site is located in a Seismic Zone 4 based on 1997 Uniform Building Code ("UBC") and 2001 California Building Code ("CBC"). Chapter 15 of the Town Municipal Code requires that all structures within the boundaries of the Town shall be designed to the requirements of Seismic Zone 4 as defined in UBC/CBC.

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
	Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the UBC and the CBC as well. The UBC/CBC identifies seismic factors that must be considered in structural design. The Project would comply with Town Municipal Code Chapter 17.16.050 “Grading and Clearing” which requires the preservation of existing trees and vegetation. In addition, the Project Applicant would submit a Vegetative Hazard Management Plan (“VHMP”) for approval by the Mammoth Lakes Fire Protection District.
<p>6 Landscape plans shall be designed to promote continuity among landscaped areas throughout the project.</p>	<p>Consistent. As described in Section III, Project Description, of this Draft EIR, a key concept of the Project is to provide pedestrian connectivity within the Specific Plan area. As such, building forms have been arranged to provide pedestrian access through the Project sites and to provide gathering spaces within open courtyards and a public plaza. The Project’s placement of sidewalks, trails, and paths, and public plazas would aim to connect the hotels and residents with the Town-core, as well as, with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and trails. Pursuant to Specific Plan Design Standards and <i>Town of Mammoth Lakes Design Guidelines</i>, trails and sidewalks would be appropriately landscaped. See response to General Plan Policy C.2.N.</p>
<p>7 Building heights and setbacks for proposed development areas shall be coordinated to promote a varied skyline.</p>	<p>Consistent. See response to Specific Plan Policy 3 and General Plan Policy C.2.N.</p>
<p>9 North Village shall appear to be nestled within a forest, with native trees surrounding the pedestrian core and integrated into the development where practical. Building heights shall generally be held at or below the height of surrounding trees. The height standards will reflect this policy. The perimeter of North Village shall have a greater forested feel than the plaza areas due to the different land use objectives between the Specialty Lodging and Plaza Resort areas and the transitional nature between the programmed activity area and the surrounding residential community.</p>	<p>Consistent. See response to General Plan Policy C.2.N.</p>
<p>10 View corridors through North Village shall be protected by establishing building massing and setback requirements. Taller buildings shall be located where they will not block or impede important views of the surroundings from public spaces.</p>	<p>Generally Consistent. See response to General Plan Policy C.2.V.</p>

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
<p>11 Careful attention should be exercised in the design and detailing of the various storefronts along the pedestrian corridor. Building ornamentation, signs, materials, architectural detailing, outdoor use areas, etc. all must combine to create a rich tapestry of texture, color, and interest. Building frontages should be expressions of individual uses rather than bland homogeneity. Eating and dining activities should be allowed to take place in the public spaces. Plazas should be large enough to accommodate public events, yet feel friendly even when sparsely occupied. A public events program is expected to be developed to coordinate activities throughout the whole year among the Town, North Village homeowner or commercial association(s) and the other resort developments.</p>	<p>Consistent. See response to General Plan Policy C.2.A.</p>
<p>12 Development of employee housing within the North Village is encouraged.</p>	<p>Consistent. The Project shall comply with the Affordable Housing Mitigation Regulations and shall provide housing for the estimated 185 Full Time Equivalent Employees associated with the Project. A housing mitigation development plan shall be submitted along with the Project generating the need for the housing. Currently, pursuant to Town Municipal Code 17.36.030(C), the Project includes 33 on-site affordable housing units and 13.4 off-site affordable housing units to accommodate the 185 full-time employee equivalents generated by the Project.</p>
Resort General (RG) (Site 1)	
<p>1 A variety of resort oriented lodging and limited commercial uses shall be developed in the RG district. Visitor lodging shall be primarily inns, resort condominiums, or specialty lodging, as opposed to motels.</p>	<p>Consistent. Site 1 would include a hotel and a series of associated common and amenity areas and uses, retail space, and a public open space plaza. The hotel would be located fronting Canyon Boulevard, oriented around an inner courtyard. The hotel is proposed to include 198 rooms and 14,390 square feet of lobby/check-in space, and hotel amenities and operations space. Hotel amenities and operations space may include business and service offices, maintenance storage, food services and meeting rooms. Amenities associated with the hotel may include office and personal services such as real estate sales, reservations, beauty salon, and child care facilities. Additional amenities may include meeting/conference rooms, a pool/spa/fitness area, and a public plaza. Development on Site 1 would include 22,000 square feet of various retail businesses which may include a restaurant/bar and gift shops (e.g., clothing, books, specialty food, sporting goods, luxury items, etc.).</p>

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy		Consistency Analysis
		Retail would front the public plaza and Minaret Road to the east. The public plaza space would include outdoor seating and landscaping features.
2	Predominantly understructure parking shall be required.	Consistent. Site 1 parking would include three surface hotel check-in parking spaces and two understructure parking levels with 238 understructure parking spaces for a total of 241 on-site parking spaces. In addition, 13 off-site on-street retail parking spaces would be located along Lake Mary Road.
4	Convenient, safe pedestrian connections to the rest of the North Village area, transit facilities and ski lifts shall be provided.	Consistent. The Project would include pedestrian and bicycle linkages from Site 3 to the Sierra Star Golf Course area and Main Street Town core to the North Village. The Project's placement of sidewalks, trails, and paths, and public plazas would aim to connect the hotels and residents with the Town core, as well as, with the North Village. The walkways and paths would connect internally and with existing or planned Town paths and trails. See response to General Plan Policy C.2.A, C.2.C, C.2.E, C.2.F and C.2.G.
Specialty Lodging (SL) Land Use Policies (Site 2 and 3)		
1	Development in this district shall be oriented toward visitor and resident lodging, resort condominiums, timeshare units or employee housing. Visitor lodging shall be inns or specialty hotels (i.e., European) as opposed to motels.	Consistent. The Site 2 hotel is proposed by the applicant to be designed as a five-star rated accommodation. The hotel would be located to the southwest of the site's proposed retail area; both the hotel and the retail (discussed below) would front Lake Mary Road. The hotel would include 364 rooms. A portion of the hotel rooms may include up to 24 two-bedroom condominium units in a stand-alone building at the southwestern property line fronting Minaret Road or at the far western portion of the site along Lake Mary Road or at both. These condominium units would accommodate permanent year-round residents and these non-employee housing units may be sold as fractional ownership units. Site 2 would provide approximately 22,418 square feet of required affordable housing (up to 45 rooms) on site for up to 90 full-time employee equivalents. Site 3 would include a family-style hotel with 180 rooms. Site 3 would provide approximately 10,125 square feet of required affordable housing (approximately 21 rooms) on site for up to 40.5 full-time employee equivalents.
2	Development of parcels in this district strictly for commercial retail shall be prohibited to avoid strip commercial development and incompatibility with nearby residential uses.	Consistent. The Project would include three hotels with associated amenities and on-site affordable housing units.
3	Predominantly understructure parking shall be required.	Consistent. Site 2 parking would include three surface hotel check-in parking spaces and three understructure

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
	parking levels with 327 spaces for a total of 330 on-site parking spaces. In addition, nine off-site on-street retail parking spaces would be located along Lake Mary Road. Site 3 would include three hotel check-in parking spaces and two understructure levels. The Project would provide 149 required parking spaces for the Project and 100 public parking spaces for a total of 249 on-site parking spaces.
Public Facilities Policies	
2 Sewer facilities shall be improved to avoid overloading of current facilities.	Consistent. As noted in Section IV.N, Utilities, of this Draft EIR, the Project Applicant shall coordinate with MCWD to design and construct an equivalent sewer upgrade project to increase the capacity of sewer lines along Manzanita Road between Dorrance Road and Center Street if the Shady Rest Tract project is not complete by occupancy of the Mammoth Crossing Project.
3 Improvements shall be made, as determined by the Town Engineer, to downstream drainage in order to prevent damage and to accommodate any increased flows.	Consistent. As noted in Section IV.H, Hydrology and Water Quality, the Project would have no significant impacts related to the Town's existing drainage system capacity. However, the Project would comply with any improvements deemed necessary by the Town Engineer in order to prevent damage and to accommodate increased flows as a result of the Project.
4 Solid waste disposal shall include on-site storage and recycling methods which will reduce the amount and bulk of waste deposited at the Benton Crossing Landfill.	Consistent. The Project would include on site storage and recycling methods to reduce the bulk of waste deposited in the Benton Crossing Landfill. The Project would be incorporated into the Town's recycling program and in compliance with Assembly Bill 939 (The California Integrated Waste Management Act of 1989).
Circulation Policies	
1 On-street parking shall be eliminated, except for chain-up zones, short-term parking, transit stops and service pullouts. Adequate off-street, structured parking will be required for each proposed development within North Village.	Consistent. As noted above, all three Project sites would have understructure parking and would be limited to three hotel check in spaces per site. In addition, the Project is including 100 spaces understructure public parking on Site 3.
2 The existing street circulation system shall be revised to decrease visitor traffic through residential neighborhoods and improve traffic safety conditions.	Consistent. See response to General Plan Policy M.3.B.
4 Proposed streets and driveways shall be evaluated by the Town and Caltrans prior to construction to minimize the potential for unsafe access or traffic congestion.	Consistent. Caltrans has been involved in the planning process of the conceptual plans for the proposed Project and will review the final site plans once prepared. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies.
5 All roadway improvements shall be designed in conformance with applicable Town and Caltrans	Consistent. As noted in Section IV.M, Traffic and Circulation, the Project would be consistent with the

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
standards for traffic index, vehicular speed, and structural section. All roadway designs shall be approved by the Town of Mammoth Lakes Public Works Department and Caltrans (SR 203).	<i>Mono County Regional Transportation Plan.</i> The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies.
6 A system of pedestrian walkways shall be developed throughout the project area to facilitate pedestrian circulation between developments and with areas outside of North Village including Main Street and the balance of the Resort Corridor.	Consistent. See response to General Plan Policy M.4.A and M.4.D.
8 Bus stops and drop-off stations shall be provided at strategic locations throughout North Village to enable increased use of public transportation facilities.	Consistent. See response to General Plan Policy M.5.A.
9 All lighting on project roads shall be controlled to prevent excessive nighttime glare.	Consistent. Lighting shall comply with the design guidelines established for North Village Specific Plan and Town Municipal Code Chapter 17.34 "Outdoor Lighting." See response to General Plan Policy M.4.C.
11 At each development phase, mitigations for traffic related impacts shall be imposed in accordance with adopted policies and regulations.	Consistent. As noted in the Section IV. M, Traffic and Circulation, mitigation measures would be required to reduce cumulative plus Project intersection LOS.
12 The number of parking spaces required for any use within the Specific Plan Area shall be in proportion with and sufficient to accommodate the potential demand created by each use.	Consistent. The Project would be parked according to the requirements of the Town. Short-term surface parking would be provided adjacent to the check-in locations; guests would be directed to understructure parking structures located beneath the hotel buildings for parking during the duration of their stay. Additional proposed short-term parking includes passenger drop off and loading spaces within each site, on-street and understructure spaces to serve proposed retail uses on Site 1 and Site 2, and spaces for service and delivery vehicles. Tour bus parking, loading and unloading would be accommodated on Sites 2 and 3. In addition, Site 3 would implement 100 public parking spaces for visitors to the North Village.
Conservation and Open Space Policies	
2 Project development shall be designed to minimize or eliminate impacts on natural water resources.	Consistent. Landscape site work would be consistent with traditional approaches for the region, and would address current needs, Town Municipal Code Chapter 17.38 "Water-Efficient Landscape" regulations, Chapter 17.16.050 "Grading and Clearing" regulations and environmental considerations.
3 Project development shall be designed to minimize air quality impacts.	Consistent. As noted in Section IV.C, Air Quality, the Project is consistent with the Town of Mammoth Lakes Air Quality Management Plan. See response to General Plan Policy R.10.A, R.10.F, R.10.G, R.10.H, and R.11.A.

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy		Consistency Analysis
4	Project development shall be designed to conserve energy resources.	Consistent. See response to General Plan Policy R.6.A, R.7.B, and R.11.A.
5	Significant environmental features shall be preserved where feasible and shall be incorporated into project designs.	Consistent. Based on the conceptual development plans for the proposed Project the buildings would be clustered and arranged in a variety of heights to mirror the scale, complexity, and form and mass relative to the neighboring buildings and the surrounding tree-canopy to the extent possible. As noted above, the Project would be designed to follow the natural topography. See response to General Plan Policy C.2.I and C.2.N.
Safety Policies		
1	Provide suitable access to and circulation through the site for emergency vehicles.	<p>Consistent. Site 1 would have four emergency vehicle staging areas and two standpipe system locations. Site 2 would have six emergency vehicle staging areas and four standpipe system locations. Site 3 would have five emergency vehicle staging areas and four standpipe system locations.</p> <p>Supplemental fire lanes would be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials to ensure adequacy for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle traffic. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in location accessible to fire equipment. Final site plans are subject to review and approval by the Mammoth Lake Fire Protection District.</p>
2	Construct all buildings to minimize potential damage from earthquakes.	Consistent. The Project site is located in a Seismic Zone 4 based on 1997 Uniform Building Code (“UBC”) and 2001 California Building Code (“CBC”). Chapter 15 of the Town Municipal Code requires that all structures within the boundaries of the Town shall be designed to the requirements of Seismic Zone 4 as defined in UBC/CBC. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the UBC and the CBC as well. The UBC/CBC identifies seismic factors that must be considered in structural design. See response to General Plan Policy S.3.I.
Noise Policies		
1	Appropriate noise attenuation features shall be included in the design of all facilities.	Consistent. As noted in Section IV.J, Noise, the Project would comply with the Town’s Noise Ordinance.

**Table IV.I-3
Consistency with Specific Plan Applicable Land Use Policies**

Policy	Consistency Analysis
2 All construction and maintenance equipment will be properly equipped and operated to minimize noise disturbance.	Consistent. As noted in Section IV.J, Noise, the Project would be required to implement mitigation to reduce the noise from construction impacts to nearby sensitive receptors.
3 Noise sources, such as an outdoor music system, which add to the ambiance of the pedestrian resort, may be permitted subject to the regulations in the Municipal Code.	Consistent. The Project would be in compliance with the Town Noise Ordinances.
Parks and Recreation Policies	
1 All hotels, full-service or specialty lodging, shall provide appropriate recreational amenities for their guests.	Consistent. Recreation features associated with the Project's three hotels may include swimming pools, bicycles, spa facilities and fitness areas. Residents of the on-site affordable housing units would be provided recreational amenities in accordance with Policy 5 of the Parks and Recreation Element of the Specific Plan. See response to General Plan Policy P.4.A.
2 Some recreation facilities shall be available to the general public.	Consistent. Recreation features associated with the Project's three hotels may include swimming pools, bicycles, spa facilities and fitness areas. Residents of the on-site affordable housing units would be provided recreational amenities in accordance with Policy 5 of the Parks and Recreation Element of the Specific Plan
3 Open space areas and tree preservation shall be incorporated into the designs to retain the alpine character of Mammoth Lakes.	Consistent. Each of the three Project sites would include open public plaza with outdoor seating available to guests and visitors of the North Village.

Town of Mammoth Lakes Zoning Regulations

Under the current Town of Mammoth Lakes zoning regulations, Project site parcels 1, 2, and 3 within the Specific Plan area were designated as Specialty Lodging (SL) or Resort General (RG). As described in Section III, Project Description, of this Draft EIR, Project Site 1 would exceed the maximum allowed density of 55 RPA, and 48 RPA aggregate density for the RG zone, Site 2 would exceed the existing maximum allowed density of 48 RPA for the SL zone, and Site 3 would exceed the existing maximum allowed density of 48 RPA for the SL zone. The proposed height of the Project exceeds the maximum allowed 50-foot height permitted under the Specific Plan. In addition, the Project's proposed setbacks exceed the existing setback requirements currently allowed under the Specific Plan.

While the Project proposes changes to the zoning designations of Sites 1, 2, and 3 to "Mammoth Crossing" (MC) zoning district, providing for a range of short-stay accommodation choices, affordable housing, and retail and service uses of the types described above, this zoning designation amendment has not yet been approved and adopted for Sites 1, 2, and 3, therefore the Project would be inconsistent with the existing Specific Plan zoning.

Site 4 is designated as R zoning. Site 4 would remain as R zoning and existing zoning parameters on Site 4 as they are approved in the February 2007 *Lodestar Master Plan* amendment and District Zoning Amendment (DZA 2006-02) would be maintained. Therefore, no zoning changes are proposed and zoning on the site would be consistent with the R zoning designation.

As noted, the Project site is currently governed by the land use policies and regulations set forth in the General Plan, the Specific Plan, and the Town of Mammoth Lakes Zoning Ordinance. As discussed in Table IV.I-2 and Table IV-3, the Project would be generally consistent with the applicable policies outlined in the 2007 General Plan and the May 2008 Specific Plan (with the exception of policies related to aesthetics and visual resources, which are presented in Section IV.B, Aesthetics, of this Draft EIR), respectively. The Project is generally consistent with and implements all other applicable plans and policies. However, the Project is not consistent with existing Specific Plan density, height, and setback requirements. The Project will require redesignating the existing zone designations within the existing Specific Plan zone district. Under the current Specific Plan, the proposed Mammoth Crossing development would be designated as the “Mammoth Crossing” (MC) zoning district, providing for a range of short-stay accommodation choices, affordable housing, and retail and service uses of the types described above. As previously stated, inconsistency may indicate a significant physical impact, but the inconsistency is not itself an impact. The physical impacts of the Project are analyzed in section IV.B through IV.N of this Draft EIR. Thus, Project impacts to land use would be *less than significant* and no mitigation measures are required..

Impact LU-2 Land Use Compatibility

A project would have a significant impact if it introduced a land use that would be incompatible with surrounding existing and future planned development in the project area. As discussed in Section II Environmental Setting, of this Draft EIR, the Project Site is located in an urbanized area surrounded by existing residential, resort, recreation and retail developments. Adjacent residential land uses include the Fireside Condominiums to the north and the Hidden Valley Condominiums to the southwest. Figure II-5 illustrates an overall view of the surrounding land uses in the Project area. The Project’s proposed new development would occur within the Specific Plan area.

The Specific Plan designation is intended to create visitor-oriented entertainment retail and lodging district anchored by a pedestrian plaza and a gondola connection to Mammoth Mountain Ski Area. Uses include hotels and similar visitor accommodations along with supporting restaurants, retail, and services. Development projects will provide a wide range of amenities and services that enhance the visitor experience. The Specific Plan is intended to create visitor services and attractions, while emphasizing pedestrian access and mobility. Parcels developed for non-lodging purposes would be oriented toward visitor commercial uses. The Project is designed to meet the overall intent of the Specific Plan and the Town’s General Plan, which is to facilitate the development of the area as a concentrated, pedestrian-oriented activity center with limited vehicular access.

While the Project would introduce a more lively and intensive use, the Project would not introduce a substantial permanent increase in ambient noise levels in the Project vicinity above levels of the existing conditions. The Project would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. In addition, the Project would provide 100 spaces of public parking which would help alleviate the existing parking conditions in the North Village area.

The Specific Plan establishes architectural and landscaping guidelines to strengthen North Village's image as a resort activity node in Mammoth Lakes. While the Project would constitute a substantial intensification of building mass and increase in heights relative to existing development on each of the sites, the Project would aim to organize the form and mass of each of its proposed buildings relative to the scale of neighboring buildings and the surrounding tree-canopy. Landscaping, public space, and pedestrian access and connectivity would be compatible with adjacent walkways within the North Village area. The Project would appear to be nestled in the forest and would retain, and protect during construction activities, existing native trees where possible. Where new plantings are proposed, the Project would use native plants that are indigenous and adapted to the Mammoth Lakes region.

The Project is consistent with overall intent of the Specific Plan, which encourages the development of year-round uses and visitor activity to strengthen the existing winter visitor market and to improve Mammoth's attractiveness to spring, summer, and fall resort visitors. Adjacent residential land uses are comprised of multi-family developments and are currently surrounded by existing resort, recreation and visitor-serving amenities. Therefore the Project would introduce a similar adjacent land use to these existing residential developments. In addition, the Project is similar to the future planned developments in the Project area as listed on Table II-1, Related Projects, in Section II, Environmental Setting and illustrated on Figure II-11 (e.g., Holiday Haus Inn, The Westin, and Mammoth Hillside). Therefore impacts to land use compatibility would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact LU-3 Cumulative Impacts

Cumulative land use impacts could occur if other related projects in the vicinity of the Project site would result in land use impacts in conjunction with the Project. Descriptions of the related projects are located in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. As described in Table II-1, of the 40 related projects, 33 are residential projects located within the Town. Each of these related projects would be required to demonstrate consistency with the goals, policies, and objectives of the General Plan, applicable regional plans and compatibility with surrounding land uses. These requirements ensure that cumulative land use impacts will be avoided or mitigated to *less-than-significant* levels.

MITIGATION MEASURES

Because the Project would not result in significant impacts on land use and planning, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project's land use impacts would be *less than significant*.

IV. ENVIRONMENTAL IMPACT ANALYSIS

J. NOISE

INTRODUCTION

This section analyzes the potential for adverse impacts on the Mammoth Crossing Project (“Project”) area noise levels resulting from implementation of the Project. Information used in the following analysis is drawn from the Project description, the Traffic Impact Analysis prepared for the Project and the *Town of Mammoth Lakes General Plan 2007* (“General Plan”).

ENVIRONMENTAL SETTING

Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (“dB”). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (“dBA”) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. Table IV.J-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The L_{eq} is a measure of ambient noise, while the L_{dn} and Community Noise Equivalent Level (“CNEL”) are measures of community noise. Each is applicable to this analysis and defined as follows:

- Ambient noise (“ L_{eq} ”), the equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- Community Noise (“L_{dn}”), the Day-Night Average Level, is a 24-hour average L_{eq} with a ten dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a five dBA “weighting” during the hours of 7:00 p.m. to 10:00 p.m. and a ten dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
- L_{min}, the minimum instantaneous noise level experienced during a given period of time.
- L_{max}, the maximum instantaneous noise level experienced during a given period of time.

**Table IV.J-1
Representative Environmental Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet	—100—	
Gas Lawnmower at 3 feet	—90—	
	—80—	Food Blender at 3 feet Garbage Disposal at 3 feet
Diesel Truck going 50 mph at 50 feet	—70—	Vacuum Cleaner at 10 feet
Noisy Urban Area during Daytime	—60—	Normal Speech at 3 feet
Gas Lawnmower at 100 feet	—50—	Large Business Office
Commercial Area	—40—	Dishwasher in Next Room
Heavy Traffic at 300 feet	—30—	Theater, Large Conference Room (background)
Quiet Urban Area during Daytime	—20—	Library
Quiet Urban Area during Nighttime	—10—	Bedroom at Night, Concert Hall (background)
Quiet Suburban Area during Nighttime	—0—	Broadcast/Recording Studio
Quiet Rural Area during Nighttime	—0—	Lowest Threshold of Human Hearing
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: California Department of Transportation, 1998.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low

daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

When evaluating changes in 24-hour community noise levels, a difference of three dBA is a barely perceptible increase to most people. A five dBA increase is readily noticeable, while a difference of ten dBA would be perceived as a doubling of loudness.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about three dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about five dBA, while a solid wall or berm reduces noise levels by five to ten dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more.

Fundamentals of Environmental Groundborne Vibration

Groundborne vibration is sound radiated through the ground, and is an oscillatory motion that can be described in terms of the displacement, velocity, or acceleration. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides, etc.), or manmade causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous, such as factory machinery, traffic, trains, and most construction vibrations (with the exception of pile driving, blasting, and some other types of construction/demolition), or transient, such as explosions.¹

The ground motion caused by vibration is measured as particle velocity in inches per second in the United States. The peak particle velocity (“PPV”) is defined as the maximum instantaneous positive or negative

¹ California Department of Transportation, *Transportation Related Earthborne Vibrations, Technical Advisory Number TAV-02-01-R9601, February 20, 2002.*

peak of the vibration signal. According to data published by the California Department of Transportation (“Caltrans”), the PPV threshold of perception for humans falls approximately in the 0.006-0.019 range. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

The general human reaction to various continuous vibration levels, as well as their potential damage to buildings, is described in Table IV.J-2, Reaction of People and Damage to Buildings at Various Continuous Vibration Levels.

As shown in Table IV.J-2, data published by Caltrans indicate that 0.08 inch/second PPV is the level at which continuous vibrations are readily perceptible by people, and 0.10 inch/second PPV is the level at which continuous vibrations begin to annoy people in buildings. It should be noted, however, that the annoyance levels in Table IV.J-2 need to be interpreted with care. Depending on the activity (or inactivity) a person is engaged in, vibrations may be annoying at much lower levels than those shown in Table IV.J-2. In particular, elderly, retired, or ill people staying mostly at home, people reading in a quiet environment, people involved in vibration sensitive hobbies or other activities are but a few examples of people that are potentially annoyed by much lower vibration levels.²

² California Department of Transportation, *Transportation Related Earthborne Vibrations, Technical Advisory Number TAV-02-01-R9601, February 20, 2002.*

**Table IV.J-2
Reaction of People and Damage to Buildings at Various Continuous Vibration Levels**

Vibration Level (Peak Particle Velocity – in/sec)⁽¹⁾	Human Reaction	Effect on Buildings
0.006-0.019	Threshold of perception; possibility of intrusion.	Vibrations unlikely to cause damage of any type.
0.08	Vibrations readily perceptible.	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected. This criterion level may also be used for historical buildings, or buildings that are in poor condition.
0.10	Level at which continuous vibrations begin to annoy people.	Virtually no risk of “architectural” damage to normal buildings.
0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations).	Threshold at which there is a risk of “architectural” damage to normal dwelling-houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize “architectural” damage.
0.4-0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage.
<p><i>Notes:</i> (1) The vibration levels are based on peak particle velocity in the vertical direction. Where human reactions are concerned, the value is at the point at which the person is situated. For buildings, the value refers to the ground motion. No allowance is included for the amplifying effect, if any, of standard components.</p> <p><i>Source: California Department of Transportation, Transportation Related Earthborne Vibrations, Technical Advisory Number TAV-02-01-R9601, February 20, 2002.</i></p>		

REGULATORY FRAMEWORK

Federal Regulations

Noise

There are no federal noise regulations applicable to the Project.

Groundborne Vibration

The State *CEQA Guidelines* do not define the levels at which groundborne vibration is considered "excessive." This analysis uses the Federal Railway Administration's vibration impact thresholds for sensitive buildings, residences, and institutional land uses. These thresholds for residences and buildings

where people normally sleep (e.g., nearby residences) are 80 vibration decibel (VdB) for infrequent activities (less than 70 per day) and 72 VdB for frequent events (more than 70 per day).

State Regulations

Noise

The California Department of Health Services (“DHS”), Office of Noise Control, has published the Guidelines for Noise and Land Use Compatibility, which recommend guidelines for local governments to use when setting standards for human exposure to noise and preparing noise elements for general plans. These guidelines are summarized in Table IV.J-3, Noise and Land Use Compatibility Criteria. It should be noted that application of these guidelines to development projects is not mandated by the DHS; however, each jurisdiction is required to consider the Noise and Land Use Compatibility Criteria when developing its general plan noise element and when determining acceptable noise levels within its community.

**Table IV.J-3
Noise and Land Use Compatibility Criteria**

Land Use	Community Noise Exposure (L_{dn} or CNEL, dB)			
	Normally Acceptable ⁽¹⁾	Conditionally Acceptable ⁽²⁾	Normally Unacceptable ⁽³⁾	Clearly Unacceptable ⁽⁴⁾
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 - 70	—	above 65
Sports Arena, Outdoor Spectator Sports	—	50 - 75	—	above 70
Playgrounds, Neighborhood Parks	50 - 70	—	67 - 75	above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	—	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	—

Notes:

- (1) *Normally Acceptable:* Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
- (2) *Conditionally Acceptable:* New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
- (3) *Normally Unacceptable:* New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
- (4) *Clearly Unacceptable:* New construction or development should generally not be undertaken.

Source: Office of Noise Control, California Department of Health Services (DHS).

As shown in Table IV.J-3, residential land uses and other noise sensitive receptors generally should be located in areas where outdoor ambient noise levels do not exceed 65 to 70 dBA (L_{dn} or CNEL). For single-family, duplex, and mobile homes, an exterior noise level up to 60 dBA (L_{dn} or CNEL) is considered to be a “normally acceptable” noise level, which is based on the assumption that any buildings involved are of normal construction that would not require special noise insulation. For multi-family homes, motels, and hotels, an exterior noise level up to 65 dBA (L_{dn} or CNEL) is considered to be a “normally acceptable” noise level. Between these noise values and 70 dBA (L_{dn} or CNEL), exterior noise levels for these land uses would be considered to be “conditionally acceptable,” where construction should only occur after a detailed analysis of the noise reduction requirements is made and needed noise attenuation features are included in the Project. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. For commercial uses, exterior noise levels up to 70 dBA (L_{dn} or CNEL) are considered to be a “normally acceptable” noise level, while exterior noise levels up to 77 dBA (L_{dn} or CNEL) are considered to be a “conditionally acceptable” noise level.

Title 24 of the California Code of Regulations codifies Sound Transmission Control requirements, which establishes uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new multi-family dwellings. Dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application.

Local Regulations

Town of Mammoth Lakes Noise Regulation

The Town of Mammoth Lakes (“Town”) is the local agency responsible for adopting and implementing policies as they relate to noise levels and its affect on land uses within its jurisdiction. Both acceptable and unacceptable noise levels associated with construction activities and exterior noise levels at various land use zones have been defined and quantified. Chapter 8.16 of the Mammoth Lakes Municipal Code (Town Noise Ordinance) controls unnecessary, excessive, and annoying noise in the Town. The Town Noise Ordinance sets forth sound measurement and criteria, maximum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance to the peace, and legal remedies for violations.

Exterior Noise Limits

Section 8.16.070 of the Town Noise Ordinance establishes exterior noise limits for various land use categories. These exterior noise limits are shown in Table IV.J-4, Town of Mammoth Lakes Exterior

Noise Limits. According to Section 8.16.070 of the Town Noise Ordinance, noise levels are not allowed to exceed:

- 1) The noise standard for that land use identified in Table IV.J-4 for a cumulative period of more than thirty minutes in any hour; or
- 2) The noise standard plus five decibels for a cumulative period of more than fifteen minutes in any hour; or
- 3) The noise standard plus ten decibels for a cumulative period of more than five minutes in any hour; or
- 4) The noise standard plus fifteen decibels for a cumulative period of more than one minute in any hour; or
- 5) The noise standard plus twenty decibels or the maximum measured ambient level, for any period of time.

**Table IV.J-4
Town of Mammoth Lakes Exterior Noise Limits**

Receiving Land Use	Time Period	Noise Zone Classification ⁽¹⁾ Maximum Noise Levels (dBA) (Levels Not to Be Exceeded More Than Thirty Minutes in Any Hour)		
		Rural/ Suburban	Suburban	Urban
One and Two Family Residential	10 p.m. to 7 a.m.	40	45	50
	7 a.m. to 10 p.m.	50	55	60
Multiple Dwelling Residential/Public Space	10 p.m. to 7 a.m.	45	50	55
	7 a.m. to 10 p.m.	50	55	60
Limited Commercial/Some Multiple Dwellings	10 p.m. to 7 a.m.	55	—	—
	7 a.m. to 10 p.m.	60	—	—
Commercial	10 p.m. to 7 a.m.	60	—	—
	7 a.m. to 10 p.m.	65	—	—
Light Industrial	Anytime	70	—	—
Heavy Industrial	Anytime	75	—	—

Notes:
(1) The classification of different areas of the community in terms of environmental noise zones shall be determined by the noise control officer, based upon assessment of community noise survey data. Additional area classification should be used as appropriate to reflect both lower and higher existing ambient levels than those shown. Industrial noise limits are intended primarily for use at the boundary of industrial zones rather than for noise reduction within the zone.

Source: Town of Mammoth Lakes Noise Ordinance, Chapter 8.16.

In addition, if the existing exterior ambient noise level exceeds the permissible level within the noise limit categories, the allowable noise exposure standard is increased in five dBA increments in each category as appropriate to encompass or reflect the ambient noise level. Furthermore, in the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category would

be increased to reflect the maximum ambient noise level (Section 8.16.070 and 8.16.080 of the Town Noise Ordinance).

Interior Noise Limits

Section 8.16.080 of the Town Noise Ordinance establishes interior noise limits for multifamily residential dwellings. According to Section 8.16.080 of the Town Noise Ordinance, interior noise levels resulting from outside sources within residential units shall not exceed 45 dBA for a cumulative period more than five minutes in any hour between 7 a.m. and 10 p.m., and 35 dBA for a cumulative period of more than five minutes in any hour between 10 p.m. and 7 a.m. In addition, interior noise levels may not exceed:

- 1) The noise standards plus five decibels for a cumulative period of more than one minute in any hour; or
- 2) The noise standard plus ten decibels or the maximum measured ambient, for any period of time.

Furthermore, if the existing interior ambient noise level exceeds the permissible level within the noise limit categories, the allowable noise exposure standard is increased in five dBA increments in each category as appropriate to encompass or reflect the ambient noise level.

Construction Noise Limits

According to Section 15.08.020 of the Town Municipal Code, construction activities are permitted between the hours of 7 a.m. and 8 p.m., Monday through Saturday. Work hours on Sundays and Town recognized holidays are limited to the hours between 9 a.m. and 5 p.m., and are permitted only with the approval of the building official or designee.

The Town has established noise standards for construction activity in Section 8.16.090 of the Town Noise Ordinance. The construction noise standards are shown in Table IV.J-5, Town of Mammoth Lakes Construction Noise Standards. As shown below in Table IV.J-5, the Town has established maximum exterior noise levels during permitted work hours from the operation of equipment used in construction, drilling, repair, alteration, or demolition work. All mobile and stationary internal-combustion powered equipment and machinery are also required to be equipped with suitable exhaust and air-intake silencers in proper working order.

**Table IV.J-5
Town of Mammoth Lakes Construction Noise Standards**

Construction Equipment ⁽¹⁾	Maximum Noise Levels			
	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Areas Semi- Residential Commercial	Business Properties
Mobile Equipment⁽²⁾				
Daily, except Sundays and legal holidays; 7 a.m. to 8 p.m.	60dBA	65 dBA	70 dBA	—
Daily, 8 p.m. to 7 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA	—
Daily, including Sunday and legal holidays; All hours	—	—	—	75 dBA
Stationary Equipment⁽³⁾				
Daily, except Sundays and legal holidays; 7 a.m. to 8 p.m.	78 dBA	80 dBA	85 dBA	—
Daily, 8 p.m. to 7 a.m. and all day Sunday and legal holidays	60 dBA	65 dBA	70 dBA	—
Daily, including Sunday and legal holidays; All hours	—	—	—	85 dBA
<i>Notes:</i> (1) All mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order. (2) Maximum noise levels for nonscheduled, intermittent, short-term operation (less than ten days) of mobile equipment. (3) Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of ten days or more) of stationary equipment.				
<i>Source: Town of Mammoth Lakes Noise Ordinance, Chapter 8.16.</i>				

Groundborne Vibration Regulation

A vibration threshold has been established in Section 8.16.090 of the Town Noise Ordinance. As indicated in Section 8.16.090 of the Noise Ordinance, operating or permitting the operation of any device that creates a vibration that is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. According to Section 8.16.020 of the Town Noise Ordinance, the vibration perception threshold is generally defined as a motion velocity of 0.01 inch per second over the range of one to one hundred Hertz (“Hz”),³ which is considered to be the minimum ground-borne or structure-borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as, but not limited to, sensation by touch or visual observation of moving objects.

³ Hertz is a unit of frequency equal to one cycle per second.

EXISTING CONDITIONS

Existing Noise Environment

The Project is situated within the North Village Specific Plan area at the Main Street-Lake Mary Road/Minaret Road intersection. The Project site and surrounding area are characterized predominantly by residential, retail, resort and recreational land uses. The majority of the Project area is currently developed.

According to the General Plan Noise Element, the most significant noise sources in the Town include:

- Traffic on State Route 203 and major Town roadways
- Aircraft operations at Mammoth/June Lakes Airport (Mammoth Yosemite Airport)
- Helicopter operations at Mammoth Hospital⁴
- Snowmaking operations
- Snow removal activities
- Avalanche control operations
- Industrial activities near State Route 203 and Meridian Boulevard

Additional noise sources in the Town also result from temporary or periodic construction activities as well as recreational activities, such as the use of snowmobiles and off-road motorcycles. Located within the Town, the Project site is also subject to these various noise sources.

Existing Roadway Noise Levels On Site

While the various noise sources identified above generate mostly short-term noise levels, vehicular traffic is the major long-term noise source in the Town. Existing (winter 2008) roadway noise levels were calculated for the roadway segments of the Minaret Road/Lake Mary Road-Main Street intersection which both border and bisect the Project's three sites, to identify on-site noise levels due to traffic.⁵ This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model ("FHWA-RD-77-108") and traffic volumes from the Project traffic analysis (included as Appendix H of this Draft EIR). The noise model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle

⁴ The Mammoth Hospital is no longer being used for helicopter operations.

⁵ The roadway noise levels are calculated for the existing (2008) typical winter conditions, which were used to represent the baseline condition in the Traffic Impact Analysis for the Project.

noise rates identified for the state of California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The calculated average daily 24-hour noise levels along these roadway segments are presented in Table IV.J-6, Existing (Winter 2008) Roadway Noise Levels On Site.

**Table IV.J-6
Existing (Winter 2008) Roadway Noise Levels On Site**

Roadway	Roadway Segment	Reference CNEL at 100 feet ⁽¹⁾	Distance to Noise Contour (feet)		
			70 L _{dn}	65 L _{dn}	60 L _{dn}
Minaret Road	North of Lake Mary Road/Main Street	57.2	14	14	65
	South of Lake Mary Road/Main Street	55.8	—	24	52
Lake Mary Road	West of Minaret Road	58.4	—	37	79
Main Street	East of Minaret Road	58.9	—	39	84

Notes:
 (1) Distances are in feet from roadway centerline. The identified noise level at 100 feet from the roadway centerline is for reference purposes only as a point from which to calculate the noise contour distances. It does not reflect an actual building location or potential impact location.

Source: Christopher A. Joseph and Associates, May 2008. Calculation data and results are provided in Appendix H to this Draft EIR.

Existing Roadway Noise Levels Off Site

Existing (Winter 2008) roadway noise levels were calculated for the roadway segments in the Project vicinity that have existing noise-sensitive uses facing the roadways. As with the on-site noise levels, this task was accomplished using the FHWA-RD-77-108 model and traffic volumes from the Project traffic analysis. The average daily noise levels along these roadway segments are presented in Table IV.J-7, Existing (Winter 2008) Roadway Noise Levels Off Site. These noise measurements shown represent the noise levels experienced at approximately 75 feet from the roadway centerline.

**Table IV.J-7
Existing (Winter 2008) Roadway Noise Levels Off Site**

Roadway	Roadway Segment	Off Site Uses	dBA L _{dn} at 75 feet ⁽¹⁾
Minaret Road	North of Meridian Boulevard.	Rural	57.9
	South of Meridian Boulevard	Rural	55.3
	North of Lake Mary Road/Main Street	Hotel	59.8
	South of Lake Mary Road/Main Street	Rural	58.2
	South of 7B Road	Rural	58.0
	North of Forest Trail	Rural	57.7
	South of Forest Trail	Commercial	58.7
Meridian Boulevard	West of Minaret Road	Rural	56.9
	East of Minaret Road	Rural	57.7

**Table IV.J-7
Existing (Winter 2008) Roadway Noise Levels Off Site**

Roadway	Roadway Segment	Off Site Uses	dBA L_{dn} at 75 feet⁽¹⁾
Lake Mary Road	West of Minaret Road	Hotel	63.5
	West of Kelly Road	Rural	54.6
	East of Kelly Road	Rural	55.7
	West of Lakeview Boulevard	Residential	56.4
	East of Lakeview Boulevard	Residential	56.8
	West of Canyon Boulevard	Residential	56.9
	East of Canyon Boulevard	Residential	60.1
Main Street	East of Minaret Road	Residential	63.9
	East of Mountain Boulevard	Residential	63.7
	West of Mountain Boulevard	Residential	63.7
	West of Center Street	Residential	63.9
	East of Center Street	Commercial	63.9
	West of Old Mammoth Road	Commercial	63.4
	East of Old Mammoth Road	Commercial	60.7
Forest Trail	West of Minaret Road	Hotel	54.0
	East of Minaret Road	Residential	50.3
Kelly Road	South of Lake Mary Road	Rural	52.7
Lakeview Boulevard	North of Lake Mary Road	Rural	51.3
Canyon Boulevard	North of Lake Mary Road	Hotel	57.6
Mountain Boulevard	North of Main Street	Residential	50.2
	South of Main Street	Residential	47.6
Center Street	North of Main Street	Commercial	50.7
	South of Main Street	Commercial	52.0
Old Mammoth Road	South of Main Street	Commercial	59.3
<i>Notes:</i> (1) The dBA L _{dn} values represent the noise levels experienced at approximately 75 feet from the roadway centerline.			
<i>Source: Christopher A Joseph and Associates, 2008. Calculation data and results are provided in Appendix H of this Draft EIR.</i>			

Existing Groundborne Vibration

Existing sources of groundborne vibration in the Town, including the Project site and its vicinity, generally include, but are not limited to, construction activities, avalanche control activities (e.g., blasting), snow removal activities, and roadway truck traffic. Within the Project area, the existing residential uses are considered to be vibration-sensitive land uses.

ENVIRONMENTAL IMPACTS

Methodology

Implementation of the Project could result in the introduction of noise levels that may exceed permitted Town noise levels. The primary sources of noise associated with the Project would be construction activities at the Project site and Project-related traffic volumes associated with operation of the proposed

residential and commercial developments. Secondary sources of noise would include new stationary sources (such as heating, ventilation, and air conditioning units) and increased human activity throughout the Project site. The net increase in Project site noise levels generated by these activities and other sources have been quantitatively estimated and compared to the applicable noise standards and thresholds of significance.

Aside from noise levels, groundborne vibration would also be generated during the construction phase of the Project by various construction-related activities and equipment. Thus, the groundborne vibration levels generated by these sources have also been estimated and compared to applicable thresholds of significance.

Construction Noise Levels

Construction noise levels were estimated by data published by the United States Environmental Protection Agency (“U.S. EPA”). Potential noise levels are identified for off-site locations that are sensitive to noise, including existing residences.

Roadway Noise Levels

Roadway noise levels have been calculated for various locations around the Project site vicinity. The noise levels were calculated using the FHWA-RD-77-108 model and traffic volumes from the Project traffic analysis. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans.

Groundborne Vibration Associated with Construction Equipment

Groundborne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by Harris Miller Miller & Hanson Inc. for the Federal Transit Administration. Potential vibration levels resulting from construction of the Project are identified for off-site locations that are sensitive to vibration, including existing residences.

Thresholds of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, the project could have a significant environmental impact if it would result in:

- (a) Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies;
- (b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;

- (c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- (d) A substantial temporary or periodic increase in ambient noise levels in the project above levels existing without the project;
- (e) Exposure of people residing or working in the project area to excessive noise levels if the project is located within an area covered by an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport; or
- (f) Exposure of people residing or working in the project area to excessive noise levels if the project is located in the vicinity of a private airstrip.

The State *CEQA Guidelines* do not define the levels at which groundborne vibration or groundborne noises are considered “excessive.” This analysis uses the Town of Mammoth Lakes’ vibration impact threshold identified in Section 8.16.090 of the Town Noise Ordinance. According to Section 8.16.090 of the Town Noise Ordinance, operating or permitting the operation of any device that creates a vibration that is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The vibration perception threshold is generally defined in the Town Noise Ordinance as a motion velocity of 0.01 inch per second over the range of one to one hundred Hertz (Hz).

The State *CEQA Guidelines* do not define the levels at which temporary and permanent increases in ambient noise are considered “substantial.” As discussed previously in this section, a noise level increase of three dBA is barely perceptible to most people, a five dBA increase is readily noticeable, and a difference of ten dBA would be perceived as a doubling of loudness. Based on this information, if the existing noise environment at the sensitive land use exceeds the Town’s exterior noise limits as shown in Table IV.J-4, Town of Mammoth Lakes Exterior Noise Limits, an increase in L_{dn} noise levels of three dBA or greater resulting from the Project would be considered a significant impact. However, if the existing noise environment at the sensitive land use is at or below the Town’s exterior noise limits, an increase in L_{dn} noise levels of five dBA or greater resulting from the Project would be considered significant.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Threshold (e) and (f) listed above were determined to result in no impact. Therefore, only Thresholds (a) through (d) listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General*

Plan, which would be required to accommodate the Project's proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project's fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact NOISE-1 Exposure of Persons to Excessive Noise Levels

Construction of the Project would require the use of heavy equipment for site grading and excavation, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in Table IV.J-8, Noise Ranges of Typical Construction Equipment, and Table IV.J-9, Typical Outdoor Construction Noise Levels. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately six dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another six dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

During construction, two basic types of activities would be expected to occur and generate noise. The first activity would involve the preparation, excavation, and grading of the Project site to accommodate the building foundations for the new residential and retail developments that are being proposed. This would require approximately 156,430 cubic yards of grading of which approximately 7,350 cubic yards

would be excavation/embankment and approximately 149,080 cubic yards would be excavation/expansion. This would require approximately 320 daily truck trips (inbound and outbound) to haul the material to an off-site location. The second activity that would generate noise during construction would involve the physical construction and finishing of the new buildings. Overall, construction activities within the Project site are anticipated to occur over a 12-year period, ending in 2020. No pile driving activities would be required for the Project.

**Table IV.J-8
Noise Ranges of Typical Construction Equipment**

Construction Equipment	Noise Levels in dBA L_{eq} at 50 feet ⁽¹⁾
Front Loader	73–86
Trucks	82–95
Cranes (moveable)	75–88
Cranes (derrick)	86–89
Vibrator	68–82
Saws	72–82
Pneumatic Impact Equipment	83–88
Jackhammers	81–98
Pumps	68–72
Generators	71–83
Compressors	75–87
Concrete Mixers	75–88
Concrete Pumps	81–85
Back Hoe	73–95
Pile Driving (peaks) ⁽²⁾	95–107
Tractor	77–98
Scraper/Grader	80–93
Paver	85–88
Notes:	
(1) Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.	
(2) Pile drivers are not anticipated to be used during any phase of construction of the proposed Project.	
Source: U.S. EPA 1971.	

**Table IV.J-9
Typical Outdoor Construction Noise Levels**

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74
Source: U.S. EPA, 1971.				

As shown in Table IV.J-9, typical outdoor noise levels at noise-sensitive receptors 50 feet from the noise source could range from 77 dBA to 86 dBA L_{eq} , without implementation of noise reduction measures. The noisiest pieces of equipment which would be anticipated to be used during the Project's development would include front loaders and backhoes, which can produce maximum noise levels of approximately 86 and 95 dB(A) at 50 feet with implementation of the required feasible noise reduction control measures. Construction equipment would not include pile drivers. As with all construction equipment, these noise levels would diminish rapidly with distance from the construction site at a rate of approximately six dB(A) per doubling of distance.

The nearest sensitive receptors are the multi-family residences located approximately 25 feet to the north of Site 1 and 25 feet west and southwest of Site 2. These multi-family residential units would experience noise levels in excess of approximately 86 dBA L_{eq} during site grading and finishing. Additional multi-family residential units are located approximately 100 feet to the northwest of Site 1 and to the north-northwest of Site 2. These additional multi-family residential units may experience noise levels of approximately 80 dBA L_{eq} during site grading and finishing. Single-family residential units are located approximately 500 feet to the southwest of Site 2, 700 feet northeast of Site 1 and 700 feet northwest of Site 3. Due to the distance of these receptors from the Project site, and the fact that noise attenuates at approximately six dB (A) per doubling of distance, it is not likely that construction noise would be audible at these locations.

In addition, as discussed previously, the Project would be constructed in phases, with most phases lasting approximately 24 to 36 months. Each phase may be occupied prior to the construction of each subsequent phase, resulting in "new" sensitive receptors being generated by the development of each phase within the Project's three sites. Accordingly these "new" sensitive receptors may be exposed to maximum noise levels of approximately 86 dBA L_{eq} during site grading and finishing of the previous phase.

Currently, under Section 15.08.020 of the Town Municipal Code, construction activities are limited to between the hours of 7 a.m. and 8 p.m., Monday through Saturday. Work hours on Sundays and Town recognized holidays are limited to the hours between 9 a.m. and 5 p.m., and are permitted only with the approval of the building official or designee. In addition, the Town has established noise standards for construction activity in Section 8.16.090 of the Town Noise Ordinance (see Table IV.J-5, Town of Mammoth Lakes Construction Noise Standards). According to these established construction noise standards, the maximum exterior noise levels allowed in multi-family residential areas for mobile (e.g., excavator, backhoe, dozer, loader, etc.) and stationary equipment (e.g., generators, compressors, pumps, etc.) during 7 a.m. to 8 p.m. Monday through Saturday are 80 dBA and 65 dBA, respectively. In addition, the maximum exterior noise levels allowed in multi-family residential areas for mobile and stationary equipment during 8 p.m. to 7 a.m. Monday through Saturday, and all day Sunday and legal holidays, are 64 dBA and 55 dBA, respectively. Furthermore, all mobile and stationary internal-combustion powered

equipment and machinery are required to be equipped with suitable exhaust and air-intake silencers in proper working order under the Town Noise Ordinance.

Compliance with the provisions of the Town Municipal Code and Noise Ordinance, would ensure construction activities associated with the Project would only occur within the hours permitted for construction within the Town (i.e., 7 a.m. to 8 p.m., Monday through Saturday, and 9 a.m. to 5 p.m. on Sundays and Town recognized holidays with approval of the building official or designee). While the Project would comply with the construction hours of the Town Municipal Code, construction noise levels experienced by nearby off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed for mobile and stationary construction equipment under the Town Noise Ordinance (see Table IV.J-5, Town of Mammoth Lakes Construction Noise Standards). As such, potentially significant temporary construction noise impacts could result. Implementation of Mitigation Measures NOISE-1a and NOISE-1b would reduce noise levels from construction activity; however temporary construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in *significant and unavoidable* temporary construction noise impacts.

Mitigation Measure NOISE-1a Exposure of Persons to Excessive Noise Levels

Project developers shall require by contract specifications that the following construction best management practices ("BMPs") be implemented by contractors to reduce construction noise levels:

- a. Provide advance notification of construction to the immediate surrounding land uses around a development site.
- b. Ensure that construction equipment is properly muffled according to industry standards.
- c. Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible.
- d. Schedule high noise-producing activities between the hours of 8 a.m. and 5 p.m. to minimize disruption on sensitive uses.
- e. Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets.

Mitigation Measure NOISE-1b Exposure of Persons to Excessive Noise Levels

Project developers shall require by contract specifications that construction staging areas within the Project site would be located as far away from noise-sensitive sites as feasible.

Impact NOISE-2 Excessive Groundborne Vibration or Groundborne Noise Levels*Construction*

Construction activities that would occur within the Project site would include grading and excavation which would have the potential to generate low levels of groundborne vibration. Table IV.J-10, Vibration Source Levels for Construction Equipment, identifies various vibration velocity levels for the types of construction equipment that would operate during the construction of the Project. Based on the information presented in Table IV.J-10, vibration levels could reach as high as approximately 87 VdB within 25 feet of the Project site from the operation of large bulldozers.

**Table IV.J-10
Vibration Source Levels for Construction Equipment**

Construction Equipment		Approximate VdB at 25 feet
Pile Driver (impact)	Upper Range	112
	Typical	104
Pile Drive (sonic)	Upper Range	105
	Typical	93
Large Bulldozer		87
Caisson Drilling		87
Loaded Trucks		86
Jackhammer		79
Small Bulldozer		58
<i>Source: Harris Miller Miller Hanson, Transit Noise and Vibration Impact Assessment, May 2006.</i>		

Construction activities associated with the Project would have the potential to impact existing off-site sensitive receptors, which include the residential uses that are located adjacent to the Project Site 1 boundaries to the north and northwest and Site 2 south and southwest. Similar to noise levels, vibration levels attenuate at approximately 6 VdB per doubling of distance. Therefore, a vibration level of 100 VdB measured at 50 feet from the source would be reduced to approximately 94 VdB at 100 feet from the source.

The nearest sensitive receptors are the multi-family residences located approximately 25 feet to the north of Site 1 and 25 feet west and southwest of Site 2. These multi-family residential units may experience vibration levels of approximately 87 VdB with the use of large bulldozers and caisson drilling on the Project site. Additional multi-family residential units are located approximately 100 feet to the northwest of Site 1 and to the north-northwest of Site 2. These additional multi-family residential units may experience vibration levels of approximately 75 VdB with the use of large bulldozers and caisson drilling. Single-family residential units are located approximately 500 feet to the southwest of Site 2, 700 feet northeast of Site 1 and 700 feet northwest of Site 3. Due to the distance of these receptors from the Project site, and the fact that vibration attenuates at approximately six VdB per doubling of distance, it is not likely that construction vibrations would be noticeable at these locations.

In addition, as discussed previously, the Project would be constructed in phases, with most phases lasting approximately 24 to 36 months. Each phase may be occupied prior to the construction of each subsequent phase, resulting in “new” sensitive receptors being generated by the development of each phase within the Project’s three sites. Accordingly, these ‘new’ sensitive receptors may be exposed to maximum noise levels of approximately 87 dBA L_{eq} during site grading and finishing of the previous phase.

As discussed under Regulatory Framework above, the Town has identified a vibration impact threshold in Section 8.16.090 of the Town Noise Ordinance. According to Section 8.16.090 of the Town Noise Ordinance, operating or permitting the operation of any device that creates a vibration that is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way is prohibited. However, the nearest existing residences would be approximately 25 feet from construction.

Construction of the Project would require the use of typical construction equipment that could generate some groundborne vibration and ground-borne noise, but the Project would not involve the use of pile drivers, which have the potential to generate substantial vibration. In addition, per the Town’s requirements, construction activities that would produce groundborne vibration would primarily occur between the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday. Therefore, these activities would not occur during recognized sleep hours for residents. Based on this information, proposed construction activities associated with the Project would not expose sensitive receptors in the Project vicinity to excessive groundborne vibration levels. Therefore, Project impacts related to excessive construction-related groundborne vibration and groundborne noise would be considered *less than significant* and no mitigation measures would be required.

Operational

The Project is viewed as a pedestrian-oriented activity center with hotel uses, residential uses, commercial/retail uses, entertainment facilities, outdoor use areas, and multiple options for recreational and public amenities. These may include office and personal services such as real estate sales, reservations, beauty salon, child care facilities, meeting/conference rooms, a pool/spa/fitness area, a restaurant/bar, and a public plaza. Activities associated with these types of uses are not anticipated to involve groundborne vibration and groundborne noise. Therefore, Project operational impacts associated with excessive groundborne vibration and groundborne noise would be considered *less than significant* and no mitigation measures are required.

Impact NOISE-3 Permanent Increases in Noise (Operational Impacts)

Traffic Noise Levels On Site

Upon completion of the Project, noise levels within the Project site would be primarily generated by vehicular traffic on the surrounding roadways. As discussed previously, the Town has established exterior noise standards for different land uses. As indicated in the Town Noise Ordinance, noise levels

at each land use may not exceed the exterior noise standard plus 20 dBA for any period of time (maximum noise level). As such, the maximum noise level that is allowed for any period of time for single-family residential uses would be 70-80 dBA L_{dn} during daytime hours and 60-70 dBA L_{dn} from 10 p.m. until 7 a.m. (See Table IV.J-4, Town of Mammoth Lakes Exterior Noise Limits). The average daily noise levels along the roadway segments of Minaret Road, Lake Mary Road and Main Street were determined in order to identify on-site noise levels due to traffic on these roadways in the future when the Project is completed.

Table IV.J-11 shows the distances from the roadway centerlines to the 70 dBA L_{dn} contour for each of the roadways that would either bisect or border the Project site in the future when buildout of the Project has been completed. Based on the conceptual site plan for the Project showing the locations of the proposed residential uses relative to the surrounding roadways, none of the residential uses proposed in the Project site would be located within the 70 dBA L_{dn} contours of the roadways analyzed in Table IV.J-11. Thus, the proposed residential uses within the Project site would not be exposed to traffic noise levels exceeding 70 dBA L_{dn} . Thus, impacts associated with traffic noise levels on site would be considered *less than significant* and no mitigation measures are required.

**Table IV.J-11
Future Plus Project Roadway Noise Levels On Site**

Roadway	Roadway Segment	Reference CNEL at 100 feet ⁽¹⁾	Distance to Noise Contour (feet)		
			70 L_{dn}	65 L_{dn}	60 L_{dn}
Minaret Road	North of Lake Mary Road/Main Street	57.3	14	31	66
	South of Lake Mary Road/Main Street	56.1	—	26	55
Lake Mary Road	West of Minaret Road	58.7	—	38	82
Main Street	East of Minaret Road	59.1	—	40	87

Notes:
(1) Distances are in feet from roadway centerline. The identified noise level at 100 feet from the roadway centerline is for reference purposes only as a point from which to calculate the noise contour distances. It does not reflect an actual building location or potential impact location.

Source: Christopher A. Joseph and Associates, 2008. Calculation data and results are provided in Appendix H to this Draft EIR.

Traffic Noise Levels Off Site

As discussed under the Thresholds of Significance heading of this section, a difference of three dBA is barely-perceptible to most people, a five dBA increase is readily noticeable, and a difference of ten dBA would be perceived as a doubling of loudness. As such, this Draft EIR considers an impact to be significant if noise resulting from the Project increases L_{dn} noise levels by three dBA if sensitive land uses currently exceed Town noise limits, or by five dBA if sensitive land uses are currently at or below Town noise limits.

Because traffic is considered to be a long-term noise source, a substantial permanent increase in ambient noise levels in the Project vicinity could potentially occur. Table IV.J-12, Predicted Future Roadway Noise Levels, identifies the changes in future noise levels along the study area roadway segments in the Project vicinity.

As shown in Table IV.J-12, implementation of the Project would increase local noise levels off site by a maximum of 4.0 dBA L_{dn} at the segment of Minaret Road located north of Meridian Boulevard. However, this increase would not exceed the established Town threshold of five dBA L_{dn} for the existing 60.0 dBA L_{dn} noise limit at this roadway segment. Therefore, this impact would be considered *less than significant* and no mitigation measures are required.

**Table IV.J-12
Future Roadway Noise Levels Off Site**

Roadway	Roadway Segment	Noise Levels in dBA L_{dn} at 75 feet ⁽¹⁾			
		Existing Noise Levels	Existing Plus Project	Increase	Significance Threshold
Minaret Road	North of Meridian Boulevard	57.9	61.9	4.0	5.0
	South of Meridian Boulevard	55.3	55.5	0.2	5.0
	North of Lake Mary Road/Main Street	59.8	59.9	0.1	5.0
	South of Lake Mary Road/Main Street	58.2	58.4	0.2	5.0
	South of 7B Road	58.0	58.4	0.4	5.0
	North of Forest Trail	57.7	57.9	0.3	5.0
	South of Forest Trail	58.7	58.8	0.1	5.0
Meridian Boulevard	West of Minaret Road	56.7	56.9	0.2	5.0
	East of Minaret Road	57.6	57.7	0.1	5.0
Lake Mary Road	West of Minaret Road	63.2	63.3	0.1	3.0
	West of Kelly Road	54.6	54.7	0.1	5.0
	East of Kelly Road	55.7	55.9	0.2	5.0
	West of Lakeview Boulevard	56.4	56.5	0.1	5.0
	East of Lakeview Boulevard	56.8	57.0	0.2	5.0
	West of Canyon Boulevard	56.9	56.9	0.0	5.0
	East of Canyon Boulevard	60.1	60.3	0.2	3.0

**Table IV.J-12
Future Roadway Noise Levels Off Site**

Roadway	Roadway Segment	Noise Levels in dBA L_{dn} at 75 feet ⁽¹⁾			
		Existing Noise Levels	Existing Plus Project	Increase	Significance Threshold
Main Street	East of Minaret Road	63.6	63.9	0.3	3.0
	East of Mountain Boulevard	63.7	63.7	0.0	3.0
	West of Mountain Boulevard	63.7	63.7	0.0	3.0
	West of Center Street	63.8	63.9	0.1	3.0
	East of Center Street	63.8	63.9	0.1	3.0
	West of Old Mammoth Road	63.3	63.4	0.1	3.0
	East of Old Mammoth Road	60.5	60.7	0.2	3.0
Forest Trail	West of Minaret Road	54.0	54.0	0.0	5.0
	East of Minaret Road	50.3	50.3	0.0	5.0
Kelly Road	South of Lake Mary Road	52.7	52.9	0.2	5.0
Lakeview Boulevard	North of Lake Mary Road	51.3	51.3	0.0	5.0
Canyon Boulevard	North of Lake Mary Road	57.6	57.9	0.3	5.0
Mountain Boulevard	North of Main Street	50.2	50.2	0.0	5.0
	South of Main Street	47.6	47.6	0.0	5.0
Center Street	North of Main Street	50.7	50.7	0.0	5.0
	South of Main Street	52.0	52.0	0.0	5.0
Old Mammoth Road	South of Main Street	59.3	59.4	0.1	5.0

Notes:
 (1) The dBA L_{dn} values represent the noise levels experienced at approximately 75 feet from the roadway centerline.

Source: Christopher A. Joseph and Associates, 2008. Calculation data and results are provided in Appendix H to this Draft EIR.

On-Site Non-Vehicular Noise

Upon completion of the proposed residential developments associated with the Project, sources of noise that would be generated by operation of the new residential buildings would include new stationary sources such as ventilation and air conditioning (“HVAC”) systems. In addition, limited retail (69,150 square feet of hotel amenities and operations and general retail uses, 40,500 square feet of retail development) would also be developed. As such, the proposed limited retail would also include stationary sources of noise such as HVAC systems as well as noise associated with delivery vehicles and loading dock activities. However, in accordance with Section 8.16.090 of the Town Noise Ordinance, the HVAC systems associated with the proposed Project would be required to be sufficiently enclosed or muffled and maintained so as not to create a noise disturbance in excess of the exterior noise standards established for different land uses in the Town (see Table IV.J-4, Town of Mammoth Lakes Exterior Noise Limits).

In terms of noise generated by delivery vehicles and loading dock activities at the Hotel and new retail developments, Section 8.16.090 of the Town Noise Ordinance also prohibits the loading, unloading,

opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of 10 p.m. and 7 a.m. in such a manner as to cause a noise disturbance across a residential property line.

Furthermore, the new retail developments within the Project site would also be subject to the exterior noise standards established by the Town. Thus, with compliance with the provisions of the Town Noise Ordinance, potential noise impacts associated with HVAC systems and retail loading dock activities would be considered *less than significant* and no mitigation measures are required.

Impact NOISE-4 Temporary Increases in Noise (Construction)

Construction activities associated with the Project, particularly the use of heavy machinery, would generate temporary and intermittent ambient noise level increases in the Project vicinity. The proposed Project would employ a variety of construction equipment types including, but not limited to trucks, cranes, boring machines, compaction equipment, bulldozers, skip loaders, backhoes, scrapers, and pavers, which would temporarily increase noise levels at the construction site when in use. Compliance with the provisions of the Town Municipal Code and Noise Ordinance, would ensure construction activities associated with the Project would only occur within the hours permitted for construction within the Town (i.e., 7 a.m. to 8 p.m., Monday through Saturday, and 9 a.m. to 5 p.m. on Sundays and Town recognized holidays with approval of the building official or designee). While the Project would comply with the construction hours of the Town Municipal Code, construction noise levels experienced by nearby off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed for mobile and stationary construction equipment under the Town Noise Ordinance (see Table IV.J-5, Town of Mammoth Lakes Construction Noise Standards). As such, potentially significant temporary and intermittent increases in noise levels during construction activities could result. Implementation of Mitigation Measures NOISE-1a and NOISE-1b as discussed under Impact NOISE-1, (Exposure of Persons to Excessive Noise Levels) would reduce noise levels from construction activity; however temporary construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in *significant and unavoidable* temporary construction noise impacts.

CUMULATIVE IMPACTS

Impact NOISE-5 Cumulative Impacts

This cumulative impact analysis considers development of the Project in combination with ambient growth and other development projects within the vicinity of the Project. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and growth in the nearby area could combine with the Project to result in cumulative noise impacts.

Development of the Project in combination with the Town's 40 related projects would result in an increase in construction-related and traffic-related noise in the Project area. Related Projects are shown in Table II-1 in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the

broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The nearest related projects to the Project site, where construction activities would be concentrated, are the Lodestar project (i.e., Project Site 4) located approximately 100 feet to the south of the proposed Project and the Holiday Haus Inn located approximately 100 feet to the east of the Project site. Due to the close proximity of these receptors to the areas of the Project site where most construction would be concentrated, it is likely that construction noise would be audible at these locations.

While each of the related projects would be subject to Section 15.08.020 of the Town Municipal Code, which limits the hours of allowable construction activities, and to Section 8.16.090 of the Town Noise Ordinance, which establishes noise standards for mobile and stationary construction equipment, cumulative construction noise levels experienced by nearby off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed. As such, potentially significant cumulative construction noise impacts could result. Implementation of Mitigation Measures NOISE-1a and NOISE-1b as discussed under Impact NOISE-1, (Exposure of Persons to Excessive Noise Levels) would reduce noise levels from construction activity associated with the Project and related projects would be subject to similar mitigation measures; however cumulative construction noise levels could continue to exceed the Town's maximum exterior noise standards resulting in **significant and unavoidable** cumulative construction noise impacts.

Cumulative development in the Town would not result in the exposure of people to or the generation of excessive groundborne vibration, due to the localized nature of vibration impacts and the fact that all construction would not occur at the same time and at the same location. As mentioned above, the construction activities for each related project would only occur during the permitted hours designated in the Town's Municipal Code, and thus would not occur during recognized sleep hours for residents or on days that residents are most sensitive to exterior noise. In addition, the construction activities would be required to comply with the construction vibration threshold established in Section 8.16.090 of the Town Noise Ordinance. As such, future cumulative development associated with groundborne vibration would result in a less-than-significant cumulative impact. Therefore, the cumulative groundborne vibration impact of the Project would be **less than significant** and no mitigation measures are required.

The cumulative baseline and cumulative plus Project ambient noise levels are presented in Table IV.J-13. As shown in Table IV.J-13, cumulative development would increase local noise levels by a maximum of 2.1 dBA L_{dn} at the segment of Minaret Road, south of Meridian Boulevard. Because the increase in local noise levels along roadway segments resulting from implementation of the Project would not exceed the established thresholds of significance, this would not represent a substantial permanent increase in ambient noise levels. Therefore, this impact would be considered **less than significant** and no mitigation measures are required.

**Table IV.J-13
Cumulative Roadway Noise Levels**

Roadway	Roadway Segment	Noise Levels in dBA L_{dn} at 75 feet ⁽¹⁾			
		Cumulative Baseline	Cumulative Plus Project	Increase	Significance Threshold
Minaret Road	North of Meridian Boulevard	59.0	59.3	0.3	5.0
	South of Meridian Boulevard	57.8	59.9	2.1	5.0
	North of Lake Mary Road/Main Street	60.1	60.2	0.1	3.0
	South of Lake Mary Road/Main Street	59.6	60.0	0.1	3.0
	South of 7B Road	59.5	59.7	0.2	5.0
	South of Forest Trail	59.0	59.2	0.2	5.0
Meridian Boulevard	West of Minaret Road	58.4	58.5	0.1	5.0
	East of Minaret Road	58.2	58.4	0.2	5.0
Lake Mary Road	West of Minaret Road	63.3	63.6	0.3	3.0
	West of Kelly Road	55.5	55.8	0.3	5.0
	East of Kelly Road	56.3	56.8	0.5	5.0
	West of Lakeview Boulevard	56.8	57.0	0.2	5.0
	East of Lakeview Boulevard	57.1	57.3	0.2	5.0
	West of Canyon Boulevard	57.2	57.3	0.1	5.0
	East of Canyon Boulevard	60.5	60.8	0.3	3.0
Main Street	East of Minaret Road	63.6	63.9	0.3	3.0
	West of Mountain Boulevard	63.8	64.0	0.2	3.0
	West of Mountain Boulevard	63.8	64.0	0.2	3.0
	West of Center Street	63.8	64.0	0.2	3.0
	East of Center Street	63.7	63.9	0.1	3.0
	West of Old Mammoth Road	63.5	63.7	0.3	3.0
	East of Old Mammoth Road	60.6	60.7	0.1	3.0
Forest Trail	West of Minaret Road	55.8	55.8	0.0	5.0
	East of Minaret Road	52.8	52.8	0.0	5.0
Kelly Road	South of Lake Mary Road	54.1	54.2	0.1	5.0
Lakeview Boulevard	North of Lake Mary Road	52.7	52.7	0.0	5.0
Canyon Boulevard	North of Lake Mary Road	58.3	58.6	0.3	5.0
Mountain Boulevard	North of Main Street	51.5	51.5	0.0	5.0
	South of Main Street	47.6	47.6	0.0	5.0
Center Street	North of Main Street	50.7	50.7	0.0	5.0
	South of Main Street	53.4	54.0	0.6	5.0
Old Mammoth Road	South of Main Street	59.8	59.9	0.1	5.0

Notes:
 (1) The dBA L_{dn} values represent the noise levels experienced at approximately 75 feet from the roadway centerline.
 Source: Christopher A. Joseph and Associates, 2008. Calculation data and results are provided in Appendix H to this EIR.

With regard to stationary sources, it is also not expected that there would be a cumulatively significant impact. The major stationary source of noise that will be introduced into the Specific Plan area would likely be HVAC equipment for new residential and retail developments. However, in accordance with Section 8.16.070 of the Town Noise Ordinance, all new developments within the Town would also be subject to the exterior noise standards established by the Town for different land uses (see Table IV.J-4, Town of Mammoth Lakes Exterior Noise Limits). Furthermore, in accordance with Section 8.16.090 of the Town Noise Ordinance, the HVAC systems associated with new developments in the Town would be required to be sufficiently enclosed or muffled and maintained so as not to create a noise disturbance in excess of the exterior noise standards established for different land uses in the Town. Thus, with compliance with the provisions of the Town Noise Ordinance, potential noise impacts associated with HVAC systems would be *less than significant* and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Operational noise impacts associated with the Project would be *less than significant*. However, even with implementation of Mitigation Measures NOISE-1a and NOISE-1b listed above, temporary construction-related noise impacts associated with the Project and construction-related cumulative noise impacts would be reduced; but could continue to exceed Town thresholds for construction noise, therefore construction noise impacts would remain *significant and unavoidable*.

IV. ENVIRONMENTAL IMPACT ANALYSIS

K. POPULATION AND HOUSING

INTRODUCTION

This section addresses the following: (1) the potential of the Mammoth Crossing Project (“Project”) to induce population and/or housing growth; (2) the degree to which the Project would cause growth in comparison to adopted population and housing growth forecasts; (3) the consistency of the Project with adopted regional and local policies; and (4) the potential of the Project to affect the balance between jobs and housing. In addition, the potential cumulative population and housing impacts of the Project in combination with all known related projects are evaluated in this section.

ENVIRONMENTAL SETTING

Existing On Site Physical Conditions

Buildings currently exist on Project Sites 1 through 3. Site 1 contains the Whiskey Creek Restaurant, the old Inyo Mono Title building and accessory garage, and several existing buildings including an apartment. Site 2 contains seven existing buildings including a vacant church, the North Village Inn (which is being used as rental housing), an apartment, and office/retail and storage structures. Site 3 contains the Ullr Lodge, the White Stag Inn, and several small accessory structures on site. All structures on the Project area would be demolished or removed. As such, these portions of the Project site do contain existing residents or livable housing units, as well as employees.

Housing

The total number of housing units in the Town increased 12 percent from 1990 to 2000 as shown in Table IV.K-1. Multi-family housing experienced the greatest increase during this time period. By 2024 the total number of housing units in the Town is anticipated to increase approximately 70 percent from 9,871 in 2004 to 16,710 in 2024.¹

¹ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report (FPEIR), Population, Housing, and Economy, p. 4-224, May 2007.*

**Table IV.K-1
Housing Unit Growth Trends (1990 – 2024)**

Year	Units	Numerical Change	Percent Change
1990	7,102	-	-
2000	7,960	858	12%
2004	9,871	1,911	24%
2024	16,710	6,839	69%

Source: United States Census Bureau, Census 2000; www.census.gov, CAJA staff, December 8, 2006.

General Plan Housing Element

Household Tenure

The United States Census Bureau, Census 2000 (“Census”) data concluded that there were 2,814 households residing in Mammoth Lakes during 2000, 53.9 percent of which were classified as family households. Although there are more housing units in Mammoth Lakes than there are households, housing units are not affordable or available for the average resident. Census 2000 data shows the housing unit count to be 7,960, but only 2,814 of these housing units are occupied year round. The remaining 4,579 housing units (57.5 percent) are owned by second homeowners and are utilized on a seasonal, recreational, or occasional basis.² Additionally, of the 2,966 households in 2004, 2,560 were employee households.³

Overcrowded Households

The United States Census Bureau defines overcrowding as a housing unit that is occupied by more than one person per room (not including kitchens and bathrooms). Overcrowded households are defined as those with 1.01 or more persons per room, and units with more than 1.5 persons per room are considered severely overcrowded.

According to the 2000 census, 301 households in Mammoth Lakes are living in overcrowded conditions compared to the 164 units that were overcrowded in 1990. Mammoth Mountain Ski Area employees have an average of 2.8 roommates compared to the 2.3 roommates of the average Mammoth area employee. These numbers may not be reflected in census data because many ski area employees are not permanent residents.

In comparison with the statewide average for overcrowding (15.2 percent), census data shows the Town of Mammoth Lakes has fewer overcrowded units (10.7 percent) than the average California community.

² *Eastern Sierra Housing Needs Assessment, prepared by Housing Collaborative, Inc., December 2004, page 58.*

³ *Eastern Sierra Housing Needs Assessment, prepared by Housing Collaborative, Inc., December 2004, page 62.*

However, the true number of overcrowded households is likely greater than reflected in the census due to seasonal overcrowding, which was not accounted for in the census data.

Housing Units by Type

As noted, although there are more housing units located in Mammoth Lakes than there are households, the majority of these units are owned by second homeowners and used for seasonal, recreational, or occasional occupation. Census 2000 data show single-family detached homes are the most common form of residential housing (3,309 units). However, the combined total for multi-unit condominiums is higher (5,721 units).⁴

Regional Housing Need

The State of California and the *Town of Mammoth Lakes General Plan* (“General Plan”) require the development of a balanced residential environment with provision of suitable housing for all people regardless of age, race, status or income. The General Plan describes in detail the issues and constraints relating to housing in Mammoth Lakes. A Regional Housing Needs Allocation Plan is required pursuant to Section 65584 of Article 10.6 of state housing element law. The housing need is the minimum number of units needed to serve the Town of Mammoth Lakes, projected household population and to accommodate a normal vacancy rate and the expected loss of housing stock. In a January 8, 2002 letter, the state Department of Housing and Community Development (“HCD”) provided a range of numbers of housing units for which the Town of Mammoth Lakes should plan (refer to Table IV.K-2).⁵

**Table IV.K-2
Mammoth Lakes Fair Share of Regional Housing Needs (2001- 2008)**

Income Group	Number	Percent
Very Low	60	20.2%
Low	53	17.9%
Moderate	69	23.2%
Above Moderate	114	38.4%
TOTAL	296	99.7%
<i>Source:</i>		
<i>Regional Housing Need Plan, Town of Mammoth Lakes - General Plan Housing Element, December 2003, p. 17.</i>		

Affordable Housing Mitigation Regulations

The Town Council adopted Affordable Housing Mitigation Regulations (Chapter 17.36) in 2006. The regulations address the development of workforce housing sufficient to mitigate the increased workforce

⁴ California Department of Finance, Demographic Research Unit, Table 2: E-5 City/County Population and Housing Elements, January 1, 2006.

⁵ Town of Mammoth Lakes General Plan Housing Element, December 2003, pages 17.

housing demand created by a project. In order to determine the potential impact of a project, a formula is used to estimate the number of fulltime equivalent employees for each business type. The result is that projects are required to provide housing for the estimated number of its fulltime equivalent employees (“FTEE”). For every one FTEE generated by a project, a minimum of 250 square feet of living space is required to fulfill regulations.

A housing mitigation development plan must be submitted along with any Project generating the need for workforce housing. On-site housing is preferred. However, the regulations do allow Alternate Housing Proposals. These may deviate from the requirement for new construction of on-site workforce housing including provision of off-site housing, in-lieu fees, establishing a housing credit, or other alternate mitigation plan. Alternate Housing Proposals may be approved if the Town finds the proposal provides a greater community workforce housing benefit. Affordability levels range from 80 percent to 200 percent of median household income with the majority being affordable to households making median income or less.⁶

Commercial projects less than 5,000 square feet, residential projects with less than five units, visitor lodging projects with fewer than four rooms, and all projects in the industrial zones may pay a fee in lieu of providing housing. To encourage on-site housing in commercial projects beyond the mitigation regulations, shared parking is permitted.⁷

Conversion of Existing Residential Facilities

As detailed under Town Municipal Code 17.52 “Conversion of Existing Residential Facilities”, a suitable stock of rental housing being available in a resort community is essential to the functioning of that community. Therefore, Town Municipal Code 17.52 is adopted to assure that the rental housing supply in the Town is not adversely affected by conversion of existing rental properties to other uses or to a condominium form of ownership.

Pursuant to Town Municipal Code 17.52, the Project Applicant would be required to submit the following reports:

- Existing Supply Report (“ESR”): The ESR is intended to describe the existing housing and stipulate the conditions for which the housing is to be replaced. The ESR is required to be submitted and approved prior to the issuance of building permits by the Town.

⁶ Town of Mammoth Lakes 2005 General Plan Update FPEIR, Population, Housing, and Economy, page 4-231, May 2007.

⁷ Ibid.

- **Facilities Report:** The Facilities report shall be prepared by a California licensed architect or California registered civil or structural engineer and include information detailing the condition and estimated useful life of all elements of the existing buildings and other structures involved in the Project.
- **Building History Report:** This Report shall include the date of construction of all elements of the project; a statement of the use or uses of the facilities since construction; the date and description of each structural repair or renovation requiring an expenditure of one thousand dollars or more; a statement regarding current ownership of all improvements and underlying property; and a building codes analysis, to include a construction plan of the construction necessary.
- **Existing Tenancy Report:** This Report shall include the names and addresses of all tenants; the number of families occupying the units who are on fixed incomes, have full-time college students, have children or have disabled individuals residing in the home; the size and rental rate of each unit; the number, rental rate and size of units occupied under any federal or state assistance program; and a relocation plan for existing tenants, to include provisions as required by Section 66427.5 of the Subdivision Map Act and applicable state law.
- **Development Plan:** Elements required to be submitted in the Development Plan shall include those required pursuant to a conditional use permit application

In addition, all requirements pursuant to Town Municipal Code 17.36 “Housing” shall apply to conversions of existing rental properties to other uses or to a condominium form of ownership.

North Village Specific Plan

The *North Village Specific Plan's* (“Specific Plan”) allocations of density, location of uses, and development standards are consistent with the General Plan. In addition, the Specific Plan addresses all future development (including expansions of existing operations) in the Specific Plan area. The primary goals of the Specific Plan involve the development of facilities directed toward transient or visitor occupancy. Housing for local residents is proposed as a necessary accessory use in the Specific Plan area. Implementation of the Specific Plan will result in an increase in service-related employment opportunities and consequently in the need for low to moderate priced living accommodations.

Development within the Specific Plan area is required to construct or make available a number of affordable housing units pursuant to Mammoth Lakes Municipal Code, Affordable Housing Mitigation Regulations, Chapter 17.36. The Specific Plan requires that a minimum of 50 percent of the affordable housing required be located on property within the Resort zone or within the Specific Plan area, and the balance be located in any zone(s) other than the Residential Multi-Family (RMF-1) zone, and be located

100 percent within the Town boundaries. It should be noted that mitigation housing produced for any development within the resort corridor shall not be counted in the density calculation of the development.

Population

Population Characteristics and Growth Forecasts

Permanent Residents

The Town is experiencing growth rates similar to the rest of the Eastern Sierra region. As of 2000, the full-time resident population was 7,094 with a growth rate of 48 percent from 1990 to 2000. The permanent population at build out is expected to grow from approximately 7,600 residents in 2004 to approximately 11,000 people in 2024 (refer to Table IV.K-3).⁸ Actual build out population will depend on the types and density of units actually developed (not all properties are likely to develop at the maximum density).

**Table IV.K-3
Permanent Population Growth Trends (1970 – 2024)**

Year	Population	Numerical Change	Percent Change
1970	3,528	-	-
1980	3,929	401	11%
1990	4,785	856	22%
2000	7,094	2,309	48%
2003	7,495	401	6%
2004	7,569	74	1%
2024	11,000	3,431	45%

*Sources:
2000 Census Bureau, the Town of Mammoth Lakes - General Plan Housing Element December 2003, page 8,
and Town of Mammoth Lakes 2005 General Plan Update FPEIR, Population, Housing, and Employment
Element, page 4-220.*

Persons at One Time

Due to the resort nature of the Town, the actual population of the Town is always greater than the permanent population. The actual population includes permanent residents, transient/seasonal residents and visitors. Population growth and seasonal fluctuations in population place a strain on housing and other services.

⁸ Town of Mammoth Lakes General Plan, Housing Element, December 2003, page 8.

The Town uses “Persons at One Time” threshold, herein referred to as “PAOT,” to measure population intensity or total peak population, which represents an average winter Saturday. For purposes of projecting PAOT, the Town applies a person/unit occupancy, based upon the 2000 census of 2.43 persons per household for all units occupied by permanent residents, and a person/unit occupancy of 4.0 persons per household for all remaining visitor, second home, and seasonal resident units. The General Plan EIR occupancy rate is a generalized factor applied across all visitor-occupied units, including hotels and motels, and seasonal condominium units and single-family homes. It is likely that individual occupancy rates per unit will vary depending on unit size, number of bedrooms, and other characteristics, and that the proportion of units occupied would be less than 100 percent on any given winter weekend.

The General Plan Land Use Element forecasts buildout for the 20-year planning period of the 2007 General Plan; estimates of future population are based on an analysis of the number of units that could be constructed by a project. Considering Town land use designations and all land built to capacity, General Plan build out in 2024 is forecast to result in a peak population of over 52,000 but less than 60,000. Although the 2005 General Plan Update Final Program EIR (May 2007) anticipated maximum PAOT to be 60,700, General Plan Land Use Policy L.1.A limits total peak population of permanent and seasonal residents and visitors to 52,000. The Town’s estimated permanent population is approximately 7,600 and the current maximum PAOT is estimated at approximately 35,000.⁹ As such, the current capacity for PAOT growth would be approximately 17,000.¹⁰

As stated above, actual build-out population will depend on the size, type and density of units actually developed and not all properties are likely to develop at the maximum density. Similarly, sites that are not anticipated to be developed may actually be used. Determining a reasonable build-out forecast for the 20-year planning period of the General Plan is challenging. Although many different approaches can be used to make projections, any forecast must acknowledge that because of changing demographics, market and economic conditions, numbers will be constantly changing. Maintaining build-out population will be achieved through implementation of the General Plan goals and policies. The General Plan has identified the following four steps to accommodate and control build-out population:

- (1) District planning will be conducted to establish project context, program and characteristics.
- (2) Project-related impacts will be evaluated and mitigated to maintain acceptable Levels of Service and population policies through the California Environmental Quality Act (CEQA) or other analysis.

⁹ *Town of Mammoth Lakes 2005 General Plan Update FPEIR, Population, Housing, and Employment Element, May 2007, page 4-221.*

¹⁰ *Current capacity of 17,000 is calculated by subtracting the current PAOT (35,000) from the General Plan maximum PAOT (52,000).*

- (3) Project-related market, economic and fiscal impacts will be evaluated as needed.
- (4) The functional and aesthetic qualities of site and architectural design will be evaluated through the discretionary review process.

Employment

Due to Mammoth Lakes' tourism-based economy the majority of the population living in Mammoth Lakes is employed in the retail and services industry, education, and health and social services as shown in Table IV.K-4. It is this employment group that is most profoundly impacted by increasing real-estate values and rents. Escalating real-estate values are forcing many employees to relocate further and further away from their place of full-time employment. Many households must spend more than 30 percent of their monthly income on housing, or are faced with increased commuting costs and potentially decreased living standards.¹¹

**Table IV.K-4
Employment by Industry 2000**

Industry Type	2000	
	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	40	.9
Construction	350	8.1
Manufacturing	113	2.6
Wholesale trade	77	1.8
Retail trade	424	9.8
Transportation and warehousing, and utilities	60	1.4
Information	46	1.1
Finance, insurance, real estate and rental and leasing	166	10.8
Professional, scientific, management, admin.	379	8.8
Educational, health and social services	482	11.2
Arts, entertainment, recreation, and services	1,598	37.1
Other services	117	2.7
Public administration	161	3.7
TOTAL	4,013	100

Source: Census Bureau (2000 Census, SF3: P49)

ENVIRONMENTAL IMPACTS

Thresholds of Significance

As stated in Section 15126.2(d) of the State *CEQA Guidelines*, "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." Based on

¹¹ *Town of Mammoth Lakes General Plan Housing Element, December 2003, pages 8-9.*

Appendix G of the State *CEQA Guidelines*, a project would have a significant impact on population and housing resources if the project would:

- (a) Induce substantial population growth in an area, either directly (for example, through extension of roads or other infrastructure);
- (b) Displace substantial numbers of existing housing necessitating the construction of replacement housing; or
- (c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, potentially significant impacts exist for all three thresholds. Therefore, the thresholds listed above are addressed in the following discussion.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes’ General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact POP-1 Population Growth

The Project would create opportunities for both temporary and permanent employment. The potential for the Project to induce population growth from such forms of employment is discussed below.

Population Growth Due to Temporary Jobs

Construction of the Project is anticipated to generate temporary construction-related jobs. However, construction-related employment opportunities would not likely result in household relocation by construction workers to the vicinity of the Project site for various reasons, including the following:

- Construction employment has no regular place of business; rather, construction workers commute to job sites that may change several times a year.
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized, and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.
- Some construction workers would likely be drawn from the construction employment labor force (eight percent of the total labor force) already present in the Town and surrounding communities. The construction of the hotels would require specialized workers (as mentioned above), and the developer would likely employ these workers from outside the Town and area.

Consequently, Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project. As such, a substantial number of permanent residents would not likely be generated as a result of the construction of the Project and impacts associated with population growth due to temporary jobs would be *less than significant* and no mitigation measures are required.

Population Growth Due to Permanent Jobs

The Project includes up to 742 condominium/hotel rooms and 40,500 square feet of retail development. In addition to the new residents associated with the proposed residential uses, the Project would create an estimated 185 FTEEs (as shown in Table IV.K-5). These employees would either: (1) live in the residences constructed as part of the Project, (2) already reside in the Town, (3) commute to the Town, or (4) relocate to the Town. The State of California documents the Town of Mammoth Lakes'

unemployment rate at 5.3 percent, totaling 300 people in May 2007.¹² Therefore, some of the employment associated with the Project could be filled by persons from the existing employment base in the Project area and/or by future residents at the Project site. However, for a conservative analysis, it is assumed that all 185 employees would relocate to the area, introducing 185 employee-related residents to the Town through indirect population growth due to permanent jobs. This is consistent with the growth anticipated in the 2007 General Plan. Therefore, impacts associated with population growth due to permanent jobs would be *less than significant* and no mitigation measures are required.

**Table IV.K-5
Estimated Employee Generation**

Development Area	Hotel Rooms	FTEE Generation Rate (per room)	Retail Square Feet	FTEE Generation Rate (per square foot)	TOTAL FTEE Generated by Project
Site 1	198	.225	22,000	.00042	54 ⁽¹⁾
Site 2	364	.225	18,500	.00042	90 ⁽²⁾
Site 3	180	.225	0	n/a	40.5 ⁽³⁾
Total	742	n/a	40,500	n/a	185

Notes:
 (1) 198 multiplied by .225 = 44.6 FTEE. 22,000 multiplied by .00042 = 9.24 FTEE.
 (2) 364 multiplied by .225 = 81.9 FTEE. 18,500 multiplied by .00042 = 7.8 FTEE.
 (3) 180 multiplied by .225 = 40.5 FTEE. There is no retail land use associated with Site 3.
 Source: Town of Mammoth Lakes Title 17 Zoning, Chapter 17.36 Housing Requirements, Section 030(A), 2006.

Population Growth Associated with New Infrastructure

Infrastructure associated with the Project would serve the Project site and would not facilitate additional development as a result of increased infrastructure. Additionally, the Project is consistent with the adopted *General Plan*. Therefore, impacts associated with the development of the Project would be *less than significant* and no mitigation measures are required.

Population Growth Associated with New Housing

Housing Under Existing Zoning

According to the existing Specific Plan's Specialty Lodging density designation, 48 rooms-per-acre (RPA) are allowed. The development area consists of approximately nine acres; therefore, approximately 445 rooms under the existing zoning would be permitted. As mentioned above, mitigation affordable housing produced for any development within the resort corridor shall not be counted in the density calculation of the development. Under the existing Specific Plan zoning, the development of 445 rooms would be consistent with the Town's build-out peak population since the existing land use designation has

¹² State of California, Employment Development Department, Labor Market Information Division, Labor Force Data for Sub-County Areas, website: <http://www.calmis.ca.gov/file/lfmonth/monosub.xls>.

been analyzed, and anticipated development of the site has been included in General Plan population projections. Therefore, the population associated with development under existing zoning would not exceed the PAOT established by the Town.

Housing Under Proposed Zoning

The proposed Project requires amendments to the Specific Plan to increase the allotted 48 RPA density to 80 RPA. As mentioned previously, for purposes of projecting PAOT, the Town applies a person/unit occupancy, based upon the Census 2000 of 2.43 persons per household for all units occupied by permanent residents, and a person/unit occupancy of 4.0 persons per household for all remaining visitor, second home, and seasonal resident units.

Implementation of the proposed Project would generate an increase in both the Town's projected permanent and seasonal/visitor populations. The proposed Project would result in construction of 742 hotel rooms, of which 48 could result in permanent year-round condominium residential housing rooms. In addition, the Project would include 66 on-site affordable housing rooms¹³ for a total of 808 rooms built on-site. For the purposes of this analysis, permanent year-round housing would be comprised of two-bedroom units; therefore the Project could result in a total of 57 on-site, permanent year-round housing units. The Project is anticipated to generate 2.43 persons per housing unit. Therefore the Project's 57 combined condominium and affordable permanent housing units could result in approximately 139 new permanent residents.¹⁴

In addition, the proposed Project would contribute to the Town's seasonal/visitor population increase. For purposes of forecasting the seasonal/visitor population, the 114 rooms allotted for permanent housing are subtracted from the total 808 proposed rooms (742 hotel rooms combined with 66 on-site affordable housing rooms), leaving 694 rooms for seasonal visitors. For consistency, seasonal housing would also be comprised of two-bedroom units, resulting in 347 units.¹⁵ Based on the Town's estimate of 4.0 persons per unit, the 347 seasonal units proposed by the Project could generate an increase in the Town's seasonal/visitor population of approximately 1,388 persons. The Project's 57 permanent units combined with the 347 seasonal/visitor units result in a total of 404 new units. Therefore, the proposed Project's increase to PAOT could result in a permanent population of 139 persons and a seasonal/visitor population of 1,388 persons, totaling 1,527 PAOT.

As discussed above, the average 4.0 person/unit occupancy rate is a generalized factor, and may well overstate actual occupancy, particularly of smaller units and hotel rooms. Further, it is unlikely that each

¹³ The 66 on-site affordable housing rooms are comprised of 45 rooms on Site 2 and 21 rooms on Site 3.

¹⁴ 2.43 persons per household multiplied by 57 units equals 139 new permanent residents.

¹⁵ 4.0 persons per household multiplied by 347 units equals 1,388 new seasonal/visitor residents.

size and type of unit would be fully occupied by four people on a given average winter Saturday. A Market Analysis was prepared by EPS Consultants in April, 2007; this report was peer reviewed by the Town.¹⁶ According to this analysis the expected average persons per unit for the Mammoth Crossing Project would be 3.18. Therefore, the 4.0 persons/unit is a conservative estimate representing an average winter Saturday and considers all types and various room configurations proposed by the Project are fully occupied with four people per unit.

Considering the methodology above, the Project is anticipated to contribute approximately nine percent¹⁷ of the remaining PAOT growth capacity (17,000); therefore development of the proposed Project would not exceed the Town's peak PAOT (52,000). Therefore, impacts to population growth associated with the development of the Project would be *less than significant* and no mitigation measures are required.

Additionally, the Project shall comply with the Affordable Housing Mitigation Regulations and shall provide housing for the estimated 185 FTEE associated with the Project. A housing mitigation development plan shall be submitted along with the Project generating the need for the housing. Currently, pursuant to Town Municipal Code 17.36.030(C), the Project includes 33 on-site affordable housing units and 13.4 off-site affordable housing units to accommodate the 185 FTEE generated by the Project. Therefore, impacts to affordable housing associated with the development of the Project would be *less than significant* and no mitigation measures are required.

Impact POP-2 Housing Displacement

Eighteen residential units are located within the existing North Village Inn located on Site 2 and would be removed as part of the planned improvements.¹⁸ There are no existing residential units located on Site 1 or Site 3. Removal of existing on-site housing would result in a decrease of housing units, necessitating the construction of replacement housing. The Project Applicant would be required to submit an Existing Supply Report ("ESR") pursuant to Town Municipal Code 17.52 "Conversion of Existing Residential Facilities." The ESR is intended to describe the existing housing and stipulate the conditions for which the housing is to be replaced. The ESR is required to be submitted and approved prior to the issuance of building permits by the Town. In addition, as discussed under Impact POP-1, the Project is proposing to build 24 permanent year-round residential housing units and 33 on-site affordable housing units to realize a total of 57 permanent year-round housing units, which exceeds the number of units proposed to be removed. Therefore the Project impacts related to housing displacement would be *less than significant* and no mitigation measures are required.

¹⁶ A copy of this report is available at the Town of Mammoth Lakes Community Development Department.

¹⁷ The Project's contribution of 8.98 percent was calculated by dividing the Project's incremental contribution to population growth (1,527) by the PAOT growth capacity (17,000).

¹⁸ Mark Deeds, Goodman Realty, electronic mail correspondence CAJA staff, February 28, 2008.

Additionally, as stated under Impact POP-1, the Project shall comply with the Affordable Housing Mitigation Regulations per Town Municipal Code 17.36.040 and shall provide housing for the estimated number of its FTEE associated with the Project.

Impact POP-3 Resident Displacement

As mentioned in the discussion of Impact POP-2, 18 existing residential units are located within the Project on Site 2 in the North Village Inn and would be removed as part of the planned improvements. Removal of such properties would displace approximately 44 people based on occupancy factors used in the 2005 General Plan Update Final Program EIR. Such displacement could result in a potentially significant impact. However, as discussed in Impact POP-1 and Impact POP-2, the Project Applicant would be required to submit an Existing Supply Report (“ESR”) pursuant to Town Municipal Code 17.52 “Conversion of Existing Residential Facilities.” The ESR is intended to describe the existing housing and stipulate the conditions for which the housing is to be replaced. The ESR is required to be submitted and approved prior to the issuance of building permits by the Town, and the Project is proposing to build 24 permanent year-round residential housing units and 33 affordable housing units to realize a total of 57 permanent year-round on-site housing units, and would accommodate approximately 139 new residents. Therefore the Project impacts related to housing displacement would be *less than significant* and no mitigation measures are required.

Additionally, as stated under Impact POP-1, the Project shall comply with the Affordable Housing Mitigation Regulations per Town Municipal Code 17.36.040 and shall provide housing for the estimated number of its FTEE associated with the Project.

CUMULATIVE IMPACTS

Impact POP-4 Cumulative Impacts

Growth in PAOT is expected to continue in the Town as new permanent and seasonal housing units are constructed. As mentioned previously, for purposes of projecting PAOT, the Town applies a person/unit occupancy, based upon the census of 2.43 persons per household for all units occupied by permanent residents, and a person/unit occupancy of 4.0 persons per household for all remaining visitor, second home, and seasonal resident units. Of the 40 related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR, 32 include residential developments within the Town, representing a combination of both permanent and seasonal/visitor units. Of the total 4,844 related projects housing units, permanent affordable housing could total approximately 800 units, and seasonal/visitor housing could total approximately 4,044 units. In theory, if all of these projects were constructed, the future residential units proposed for development would increase the permanent

population by 1,944 persons¹⁹ and the seasonal/visitor population by 16,176 persons²⁰, totaling 18,120 PAOT. This represents a conservative analysis, since, a) it is likely that not every Related Project listed would ultimately be built; and b) actual seasonal/visitor occupancy rates will reflect a range of unit types and sizes, and in many cases are likely to be less than 4.0 persons per unit.

As mentioned above, the current PAOT growth capacity of the Town is approximately 17,000. Therefore the cumulative population generation of the related projects without the proposed Project could potentially exceed the current PAOT growth capacity for the Town.

The proposed Project would increase the density assigned in the existing Specific Plan zoning from 48 RPA to 80 RPA, contributing to a potential population increase in the Specific Plan area and the Town's 2024 build-out projection of PAOT. As previously discussed, the PAOT associated with the proposed Project would represent approximately nine percent of the Town's current capacity for PAOT growth (17,000). PAOT associated with the related projects (18,120) combined with the proposed Project's PAOT (1,527), could amount to as much as 19,647 PAOT for cumulative residential development.

As previously described, the PAOT is used as the Town's threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. Actual build-out population would depend on the types and density of units actually developed and not all properties are likely to develop at the maximum density. Although the 2005 General Plan Update Final Program EIR (May 2007) analyzes a maximum PAOT to be 60,700, General Plan Land Use Policy L.1.A limits total peak population of permanent and seasonal residents and visitors to 52,000. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation would not exceed the anticipated PAOT of 52,000. The cumulative impacts to PAOT would therefore be *less than significant* and no mitigation measures are required.

In addition, for the reasons noted above, development of the Project in conjunction with the applicable related projects would assist the Town in meeting its fair share of regional housing need, constituting a beneficial rather than adverse housing impact.

Because development of the Project and the related projects would help address a portion of unmet housing demand and serve anticipated population growth in the Project area, either directly (for example,

¹⁹ 2.43 persons per household multiplied by 800 units equals 1,944 new permanent residents.

²⁰ 4.0 persons per household multiplied by 4,044 units equals 16,176 new seasonal/visitor residents.

by proposing new homes and businesses), or indirectly (for example, through extension of roads or other infrastructure), cumulative impacts would be beneficial rather than adverse.

MITIGATION MEASURES

Because the Project would not result in impacts on population and housing, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project specific impacts as well as cumulative impacts to population and housing would be *less than significant*.

IV. ENVIRONMENTAL IMPACT ANALYSIS

L. PUBLIC SERVICES

INTRODUCTION

This section addresses the subject of public services with respect to the Mammoth Crossing Project (“Project”) and includes an examination of the existing services provided to the Project site and the impacts that the Project would have on those services. The public services section is subdivided into the following five sections: (1) police; (2) fire protection; (3) schools; (4) parks and recreation; and (5) snow removal services.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes’ General Plan* (“General Plan”), which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off-site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

1. POLICE SERVICES

ENVIRONMENTAL SETTING

The Town of Mammoth Lakes Police Department (“MLPD”), located at 568 Old Mammoth Road, provides police services to the Project site and surrounding area. The MLPD is responsible for providing public safety services in the town including patrol, investigations, custody of adult offenders, wildlife management, and narcotic enforcements. In addition, the MLPD offers the following specialized crime enforcement teams to protect the citizens and property of Mammoth Lakes: Patrol Division, K-9 Unit, Detective Division, Sexual Assault Response Team (“SART”), Wildlife Management, Drug Abuse Resistance Education/School Resource Officer (“DARE/SRO”), Property & Evidence, Mono County Narcotic Enforcement Team (“MONET”), Bicycle Patrol and a Mounted Enforcement Unit.¹ The Mono County Sheriff’s Department and the California Highway Patrol also provide police protection and law enforcement in the Town and surrounding community.²

The MLPD currently employs 23 sworn and 5 non-sworn employees; consisting of 1 chief, 1 lieutenant, 5 patrol sergeants, 13 patrol officers (including 1 K-9 officer, 1 DARE/SRO officer, 1 traffic officer, 1 detective, and 2 narcotics investigators). Non-sworn personnel include one administrative assistant, one senior records clerk, one non-sworn investigator, one community service officer, and one animal control officer.³ MLPD remains the only agency within Mono County that provides 24-hour patrol coverage. The average response time for emergency calls in the Project area is approximately five minutes and approximately 7 to 8 minutes for non-emergency calls. The existing level of service for the MLPD is one officer per 1,000 residents.

As discussed in Section IV.K, Population and Housing, of this Draft EIR, the Town of Mammoth Lakes (“Town”) is subject to large fluctuations in resident populations and visitation levels due to its tourism based economy. The Town uses a “Persons at One Time” threshold, herein referred to as “PAOT,” to measure actual population or total peak population, which represents an average winter Saturday. However, the Town expects resident and visitor recreational activities to increase in non-winter months as well. Criminal investigation calls, the primary job function of the MLPD, increase during the peak visitor months.⁴

¹ Town of Mammoth Lakes Police Department (MLPD), website: <http://www.mammothlakesspd.org/index.php>, CAJA staff, January 8, 2008.

² Town of Mammoth Lakes 2005 General Plan Update Draft Program Environmental Impact Report (DPEIR), website: <http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm>, CAJA staff, January 8, 2008.

³ Chief Randy Schienle, Mammoth Lakes Police Department, electronic mail correspondence CAJA staff, November 20, 2007.

⁴ Town of Mammoth Lakes 2005 General Plan Update FPEIR, Public Services Element, May 2007, p. 4-239.

In 2006 MLPD officers responded to 5,212 dispatched calls for service, wrote 1,906 reports, and made 460 arrests.⁵ Table IV.L-1 shows crime trends in Mono County for 2005 and 2006. Statistics are not yet available for the year 2007. The existing level of police service provides adequate protection to the Project area. However as this and other developments come on line, additional police staffing and equipment will be required in order to maintain current levels of service, such as response times and officer safety.⁶ The new MLPD facility has been approved by the Town, but funding has not been fully secured and it is not under construction at this time.

Table IV.L-1
County of Mono California Crime Index (CCI), 2005-2006

	2005 ⁽¹⁾	2006 ⁽¹⁾	Percent Change 2005-2006 ⁽²⁾
Crimes	Number of Crimes	Number of Crimes	Number of Crimes
Total violent crimes	59	40	-32.2
Homicide	0	0	—
Forcible rape	9	8	—
Robbery	4	1	—
Aggravated assault	46	31	—
Total property crimes	254	258	1.6
Burglary	102	114	11.8
Motor vehicle theft	27	17	
Larceny-theft (over \$400)	125	127	1.6

Notes:
 (1) The population of Mono County in 2005 was 13,512; the population in 2006 was 13,755.
 (2) Percent changes are not calculated when base numbers are less than 50.

Source:
 Criminal Justice Statistics Center, *Crime in California – Advanced Release, Individual Crime Tables 2005-2006*, http://ag.ca.gov/cjsc/publications/advrelease/ad/ad06/tabs/AR06_MONO_26.pdf, January 8, 2008.

Although the 2005 General Plan Update Final Program EIR (May 2007) anticipated maximum PAOT to be 60,700, General Plan Land Use Policy L.1.A limits total peak population of permanent and seasonal residents and visitors to 52,000. The Town's estimated permanent population is approximately 7,600 and the current maximum PAOT is estimated at approximately 35,000.⁷ As such, the current capacity for PAOT growth would be approximately 17,000⁸ over current conditions.

⁵ Town of Mammoth Lakes 2005 General Plan Update FPEIR, Public Services Element, May 2007, p. 4-239.

⁶ *Ibid.*

⁷ Town of Mammoth Lakes 2005 General Plan Update FPEIR, Population, Housing, and Employment Element, May 2007, page 4-221.

⁸ Current capacity of 17,000 is calculated by subtracting the current PAOT (35,000) from the General Plan maximum PAOT (52,000).

ENVIRONMENTAL IMPACTS

Threshold of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.

Project Impacts and Mitigation Measures

Impact PS-1 Police Services

The MLPD's level of service is impacted by the Town's permanent resident population as well as the PAOT population. As discussed in Section IV.K, Population and Housing, of this Draft EIR, implementation of the proposed Project would result in a permanent population of 139 persons and a seasonal/visitor population of 1,388 persons, totaling 1,527 PAOT. However, current population patterns in the Town indicate that households similar to those proposed by the Project and hotel rooms are not at full occupancy year-round; therefore, this is a conservative estimate. The additional number of people and activity on the Project site could result in an increase in the need for police services.

The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the MLPD. To some extent, it is logical to anticipate that the crime rate in a given area would increase as the level of activity or population increase, along with an increase in opportunities for crime. However, because a number of other factors also contribute to the resultant crime rate, such as police presence, crime prevention measures, and on-going legislation/funding, the potential for increased crime rates is not necessarily directly proportional to increases in land use activity. As shown in Table IV.L-1, the violent crime rate in Mono County decreased from 2005 to 2006, while the property crime rate increased.

The Project is viewed as a pedestrian-oriented activity center with hotel uses, residential uses, commercial/retail uses, entertainment facilities, outdoor use areas, and multiple options for recreational and public amenities. The Project would increase the number of persons and level of activity on the Project site during both peak and off-peak tourism periods, and would therefore result in increased demands for police services including vehicles, personnel, and equipment.⁹ The current MLPD facility

⁹ Chief Randy Schienle, Mammoth Lakes Police Department, electronic mail correspondence CAJA staff, November 20, 2007.

would not be able to accommodate additional personnel.¹⁰ Although the MLPD is currently in the process of building a new police facility that will be available in the next two to three years, it would not be able to adequately meet Project needs until that time. As previously discussed, the new MLPD facility has been approved by the Town, but funding has not been fully secured and it is not under construction at this time. Therefore impacts to police protection impacts are considered to be *significant*. The proposed Project is required to provide its fair share of Developer Impact Fees¹¹ (“DIFs”) to assist the MLPD in the construction of a public safety and dispatch facility and holding facilities as needed, as well as the recruitment and retention of new employees. With payment of the DIFs and implementation of the mitigation measures listed below the Project’s impacts to police services would be less than significant.

Mitigation Measure PS-1a Police Services

During construction the Project shall implement crime prevention features subject to the approval of the MLPD. Crime prevention features may include on-site security staff, construction security fencing, control to proposed parking areas, security lighting, and landscape planning and minimization of “dead-space” to eliminate areas of concealment.

Mitigation Measure PS-1b Police Services

During the operation of the Project, crime prevention features shall be implemented in conjunction with the non-residential components associated with the Project development as approved by the MLPD. Crime prevention features shall include trained security personnel on-site for bars and restaurants that cater to late night crowds and to patrol the non-residential components between the hours of between 6 p.m. to 2 a.m., if deemed necessary by the MLPD. All trained security personnel associated with the Project shall work in conjunction with the MLPD law enforcement to solve crimes and crime problems as requested by the MLPD. Additional MLPD-approved crime prevention features may be requested as the final uses associate with the Projects visitor-serving amenities are established.

CUMULATIVE IMPACTS

Impact PS-2 Cumulative Police Services

Implementation of the Project in conjunction with the related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would further increase the demand for police services. Projects proposed, planned or under construction within the Town would significantly increase both the permanent and tourist populations. As discussed in Section IV.K, Population and Housing, of this Draft EIR, PAOT is used as a measurement because of the large visitor population in the

¹⁰ Chief Randy Schienle, Mammoth Lakes Police Department, electronic mail correspondence CAJA staff, November 20, 2007.

¹¹ Appendix K of this Draft EIR includes the Town’s current Developer Impact Fee Schedule dated June 2007.

Town at any given time. By the year 2024 at General Plan build-out, PAOT is anticipated to reach 60,700 persons, but will be limited to 52,000 by General Plan policy, which is an increase of approximately 17,000 over current conditions. PAOT associated with the related projects (18,120) combined with the proposed Project's PAOT (1,527) would amount to 19,647 PAOT for cumulative residential development. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation is likely overstated.

Increases in population in the Town have the potential to increase calls for police protection services. Given the current condition of the existing police station combined with the increasing development and permanent resident and visitor population in Mammoth Lakes, it is anticipated that a new station would be needed for the MLPD to adequately provide police protection services in the future. It has been determined that the MLPD's current facility is considered to be at capacity for the Town's current build out, and new facilities would be required for additional development.¹² As stated above, the new MLPD facility has been approved by the Town, but funding has not been fully secured and it is not yet under construction. Therefore, the Project in conjunction with the related projects listed in Table II-1 would require that the new police facility be completed in the next two to three years to meet these additional needs. Similar to the Project, each related project would be required to implement project specific mitigation measures and to pay required DIFs which support the development of new police facilities, hiring additional staff and purchasing additional equipment in order for the MLPD to maintain acceptable service ratios, response times or performance objectives. Therefore, cumulative police protection impacts are considered to be *less than significant* and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure PS-1a Police Services and PS-1b Police Services, Project specific impacts on police services would be *less than significant*.

¹² Chief Randy Schienle, Mammoth Lakes Police Department, electronic mail correspondence CAJA staff, November 20, 2007.

2. FIRE PROTECTION SERVICES

ENVIRONMENTAL SETTING

Fire Protection and Emergency Response Services in the Project area are provided by the Mammoth Lakes Fire Protection District (“MLFPD”). Mono County provides primary emergency medical paramedic services for the Project and the MLFPD serves as the backup medical service provider. The MLFPD has two stations (see Table IV.L-2) that cover the Town and the surrounding areas of Lakes Basin, Camp High Sierra and the Mammoth Mountain Ski Area.¹³ The MLFPD has automatic mutual-aid agreements with adjoining fire departments in Long Valley and June Lake to provide backup assistance during an emergency. In addition, the MLFPD attends unified command planning meetings with the California Department of Forestry and Fire Protection (“CDF”) and retains the ability to respond under mutual aid requests, but as there are no CDF response lands in close proximity, the incident related interaction is limited.¹⁴

**Table IV.L-2
Fire Stations that Serve the Project Area**

Fire Station	Location	Equipment ⁽¹⁾	Staff	Approximate Distance from Project Site
MLFPD Station One	3150 Main St Mammoth Lakes, CA 93546	2 Engines 1 Ladder Truck 1 Ambulance 1 Water Tender	1 Fire Chief 5 Full-Time Firefighters 22 Volunteer Firefighters ⁽²⁾ 2 Mono County Paramedics	.75 miles
MLFPD Station Two	1574 Old Mammoth Rd Mammoth Lakes, CA 93546	2 Engines	21 Volunteer Firefighters ⁽²⁾	1.25 mile
<p>Notes:</p> <p>(1) Two utility vehicles vary depending on needs, and four staff vehicles are assigned to staff personnel.</p> <p>(2) The combined stations staff 43 volunteer personnel (paid per call); approximately half are assigned to each station.</p> <p>Source: Fire Marshal Thom Heller, MLFPD, electronic mail correspondence, November 11, 2007 and Jen Daugherty, Assistant Planner, Town of Mammoth Lakes.</p>				

Fire Stations

There are two fire stations that would serve the Project and surrounding area (see Table IV.L-2). The traveling distance to the Project site from Fire Station One would be approximately 0.75 mile and about 1.75 miles from Fire Station Two, depending on the exact location of the incident. Fire Station Number

¹³ Town of Mammoth Lakes, 2005 General Plan Update DPEIR, website: <http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm>, CAJA staff, November 19, 2007.

¹⁴ Fire Marshal Thom Heller, Mammoth Lakes Fire Protection District, electronic mail correspondence CAJA staff, November 11, 2007.

One was recently replaced by an updated and expanded facility. The new building is approximately 17,600 square feet with administrative offices in addition to housing for full time staff.¹⁵

Response Times

Response distance relates directly to the linear travel distance (i.e., miles between a station and a site) and the MLFPD's ability to successfully navigate the given accessways and adjunct circulation system. Roadway congestion and intersection level of service along the response route can affect the response distance when viewed in terms of travel time. The response time goal of MLFPD is less than six minutes for all incidents in MLFPD's district; this goal is generally met within the private land boundary of Town. However, adverse weather conditions are the primary reason for not successfully having the first in unit arriving within the first six minutes. Response outside the private land boundary, such as to the Lakes Basin or Mammoth Mountain Main Lodge/Inn takes longer due to additional driving time.

Staffing

Staffing for the MLFPD includes 43 volunteer personnel (paid per call) and six full-time employees, including the Chief (see Table IV.L-2). In addition, two Mono County Paramedics are based at Station Number One. Approximately half of the department members are assigned to each station. The District's offices are located at Fire Station One on Main Street. The current ratio of fire fighters per population varies due to the Town's large fluctuations in resident populations and visitation levels. The MLFPD has 49 firefighters for 7,500 permanent residents or a ratio of 1:153. At current maximum occupancy (permanent residents plus visitors), MLFPD has 49 firefighters for 41,000 population or a ratio of 1:837. The MLFPD will be staffing a fulltime shift by the beginning of 2008. This will involve the addition of at least four fulltime employees.¹⁶

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, the Project could have a significant environmental impact if it would:

- (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain

¹⁵ Fire Marshal Thom Heller, Mammoth Lakes Fire Protection District, electronic mail correspondence CAJA staff, January 14, 2008.

¹⁶ Fire Marshal Thom Heller, Mammoth Lakes Fire Protection District, electronic mail correspondence CAJA staff, November 11, 2007.

acceptable service ratios, response times or other performance objectives for fire protection services.

Project Impacts and Mitigation Measures

Impact PS-3 Fire Services

As discussed in Section IV.K, Population and Housing, of this Draft EIR, implementation of the proposed Project would result in a permanent population of 139 persons and a seasonal/visitor population of 1,388 persons, totaling 1,527 PAOT. PAOT is used as a measurement because of the large visitor population in the Town at any given time, and includes permanent residents, transient/seasonal residents and visitors. Current population patterns in the Town indicate that households similar to those proposed by the Project and hotel rooms are not at full occupancy year-round; therefore this is a conservative estimate. The MLFPD's level of service is impacted by the Town's PAOT population. As such the additional number of people and activity on the Project site could result in an increase in the need for fire services.

Physical augmentation of the Project Sites would include removal of some of the existing vegetation and trees and development of manufactured slopes, building pads, and on-site roadways. Primary points of vehicular access into the Project's three proposed development sites would be from Canyon Boulevard for Site 1, Lake Mary Road and Minaret Road for Site 2, and Minaret Road and the new road for Site 3 (refer to Figure III-12). No access points are currently proposed for Site 4 as no development is scheduled to take place there at this time. A new road would be developed to access the southern border of Site 3 from Minaret Road. New internal access roads would be created on the Project site. The access roads would be privately owned and maintained, and would provide residential, neighborhood and emergency access. The Project Applicant would be required to submit a Snow Management Plan ("SMP") for approval by the Town and the MLFPD. Methods to prevent snow and ice build-up such as snowplowing, cinder application and installation of heat traced pavement on adjacent roadways (i.e., Lake Mary Road, Minaret Road and Main Street) which could result in hazardous driving conditions would be included in the SMP. The SMP is required to be submitted and approved prior to the issuance of building permits by the Town.

Emergency vehicle parking is provided internally at an accessible location within each site. Emergency parking for Site 1 is located at the northwest corner of the site near the entry access point on Canyon Boulevard. Emergency parking for Site 2 is located at the northeast corner of the site near the north entry access point on Minaret Road. Emergency parking for Site 3 is located at the southeast corner of the site near the second entry access point on the new road (refer to Figure III-16 in Section III, Project Description of this Draft EIR).

Supplemental fire lanes would be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials so as to be adequate for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle

traffic. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in location accessible to fire equipment.

The Project would incorporate a number of fire safety features in accordance with applicable MLFPD fire-safety code and Town regulations for construction, access, fire flows, and fire hydrants. These fire safety features include, but are not limited to, ample roads, adequate building spacing, use of fire resistive building materials, and adequate vegetative clearance around structures. The Project Applicant is required to submit, prior to the issuance of building permits by the Town, a Vegetative Hazard Management Plan for approval by the Mammoth Lakes Fire Protection District. In addition, prior to the issuance of a use permit, the MLFPD requires that new development prepare a Wildland Urban Interface Hazards Management Plan.

The response time goal of MLFPD is less than six minutes for all incidents in MLFPD's district, which is generally met within the private land boundary of the Town. However, as described above, adverse weather conditions are the primary reason for not successfully having the first in unit arriving within the first six minutes. Currently, all study area intersections currently operate below or within the Town's adopted threshold of significance in the existing condition during typical winter Saturday conditions, including Old Mammoth Road, with the exception of United States Post Office ("USPO") Driveway/Main Street, as discussed in Section IV.M, Traffic and Circulation of this Draft EIR (refer to Table IV.M-3, Existing (2008) Typical Winter Saturday Intersection LOS). It is anticipated that approximately 2,604 daily trips and 235 peak-hour trips will be generated by the Project. With Project implementation, all study area intersections are forecast to operate below or within the Town's adopted threshold of significance in the existing plus Project condition with the exception of USPO Driveway/Main Street (refer to Table IV.M-6, Existing Plus Project Typical Winter Saturday Intersection LOS).

Although the intersection of USPO Driveway/Main Street is deficient in the existing condition and would continue to operate at an unacceptable LOS with the addition of the Project to existing conditions, the Town is proceeding with plans to install a traffic signal at this location per the Town's Capital Improvement Program ("CIP"). In addition, the Project contributions to DIFs would provide funding for installation of Opticom traffic coordination devices,¹⁷ which, on average, reduce emergency response times by 20 percent and help reduce accidents at intersections.¹⁸

As described above, the Project would represent a more intense use of the site. Although the relationship is not directly proportional, more intense uses of land typically result in the increased potential for fire

¹⁷ *Opticom is a traffic priority control system that enables the emergency vehicle operator to temporarily command the signal sequence of the approaching intersection.*

¹⁸ *Source: 3M Traffic Management Solutions, 3M Opticom Priority Control System, website: <http://multimedia.3m.com/mws/mediawebsserver?66666UuZjcFSLXTtMxTaMxf2EVuQEcuZgVs6EVs6E666666->, July 1, 2008.*

and emergency incidents. Thus, the Project would create an increased demand for fire protection services. However, according to the MLFPD, with the mutual-aid agreement with neighboring fire districts, their current staffing and equipment, and the addition of four fulltime employees in the summer of 2008, facility levels are adequate to accommodate the Project's demand for fire protection services during peak and off-peak tourism periods. In addition, the MLFPD is a participant in the Town's Emergency Operations Plan ("EOP") which includes the Project area. The EOP would be revised with the development of the Project to include any needed updates or changes. It would be anticipated that only minor changes would be needed to update the EOP based upon the current plans and zoning.¹⁹

The proposed Project is required to provide its fair share of DIFs²⁰ to assist the MLFPD in the construction of new facilities as needed, as well as the recruitment and retention of new employees and the purchase of new equipment. Therefore with the payment of DIFs to support both the MLFPD and the Town's CIP, implementation of Project fire safety features, emergency vehicle access and staging areas, and the preparation of vegetative and fire hazard plans and an SMP, impacts related to fire protection services would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact PS-4 Cumulative Fire Services

The Project in conjunction with the related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would be anticipated to cumulatively increase the demand for fire protection services in the MLFPD. This is primarily a result of the number and type of new buildings that the Project and the related projects bring to the MLFPD, including hotel uses, residential uses, commercial/retail uses, entertainment facilities, outdoor use areas, and multiple options for recreational and public amenities. As discussed in Section IV.K, Population and Housing, of this Draft EIR, PAOT is used as a measurement because of the large visitor population in the Town at any given time. PAOT associated with the related projects (18,120) combined with the proposed Project's PAOT (1,527), would amount to 19,647 PAOT for cumulative residential development. As discussed in Impact PS-2, the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation is likely overstated.

¹⁹ Fire Marshal Thom Heller, Mammoth Lakes Fire Protection District, electronic mail correspondence CAJA staff, January 14, 2008.

²⁰ Appendix K of this Draft EIR includes the Town's current Developer Impact Fee Schedule dated June 2007.

The MLFPD is anticipating the hiring of more fulltime positions to increase their capability to respond to additional calls and the associated administrative work that will come along with increased development and increased traffic volumes in the Town. The increase in staff and equipment is being provided for by increases in property tax and DIFs.²¹ MLFPD recognizes that the call volume and incident complexity will continue to increase as the population and unit numbers increase. As stated previously, MLFPD recently completed remodeling Fire Station One in response to additional community development. The MLFPD is anticipating the hiring of at least four more fulltime positions to increase their capability to respond to additional calls and the associated administrative work that will come along with increased development. MLFPD is also involved in the development of a strategic plan that will aid the department in planning for the future.

As described above under Project impacts, all study area intersections currently operate below or within the Town's adopted threshold of significance in the existing condition during typical winter Saturday conditions, with the exception of the two-way stop controlled intersection of USPO Driveway/Main Street, as discussed in Section IV.M, Traffic and Circulation of this Draft EIR (refer to Table IV.M-3, Existing (2008) Typical Winter Saturday Intersection LOS). With implementation of the Project and related projects, delays would be anticipated to increase at all study intersections. All study area intersections are forecasted to operate below or within the Town's adopted threshold of significance with the exception of three intersections (Minaret Road/Forest Trail, USPO Driveway/Main Street, and Center Street/Main Street); however, with improvements these three study area intersections would be anticipated to operate below or within the Town's adopted threshold of significance, based on the Town's criteria (refer to Table IV.M-7, Cumulative Plus Project Typical Winter Saturday Intersection LOS).

Similar to the Project, each related project would be required to implement project specific safety features and mitigation measures and to pay required DIFs which support the Town's CIP and the development of new fire protection facilities, hiring additional staff and purchasing additional equipment in order for the MLFPD to maintain acceptable service ratios, response times or performance objectives. Therefore, cumulative fire protection service impacts are considered to be *less than significant* and no mitigation measures are required.

MITIGATION MEASURES

Because the Project would not result in significant impacts on fire services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts on fire services would be *less than significant*.

²¹ Fire Marshal Thom Heller, Mammoth Lakes Fire Protection District, electronic mail correspondence CAJA staff, January 14, 2008.

3. SCHOOL SERVICES

ENVIRONMENTAL SETTING

Public education services within the Town of Mammoth Lakes are provided by the Mammoth Unified School District (“MUSD”). The MUSD has a current enrollment of 1,158 K-12 students, and is comprised of five schools including one elementary school, one middle school, one high school, one continuation school, and one academy for excellence school.²²

Mammoth Elementary (grades K-5), located at 2600 Meridian Boulevard; Mammoth Middle School (grades 6-8), located at 1600 Meridian Boulevard; Mammoth High School (grades 9-12), located at 365 Sierra Park Road; Sierra Continuation High School (“SHS”) (grades 11-12), located at 1601 Meridian Boulevard; and Mammoth Olympic Academy for Academic Excellence School (“MOAAES”) (grades 9-12), located at 365 Sierra Park Road are the MUSD schools that serve the Project site and surrounding area. Enrollment and class size trends for the three main schools over the last three years are shown in Table IV.L-3. Due to the specialized nature and small enrollment the MOAAES and the SHS are not included in Table IV.L-3. The MOAAES first opened in the 2003-2004 school year and has maintained an average enrollment of 21.25 students. The SHS has maintained an average class size of 27.3 students over the past three years. Schools near the Project site experience steady enrollment. These schools are near the estimated capacity of 1,290, and according to the MUSD both the Mammoth Elementary School and the Mammoth High School are in need of major improvements. To accommodate the student body at capacity, the elementary school has added several portable classrooms and the high school has added one portable classroom.²³

Table IV.L-3
School Data for Project and Vicinity

School Year	Mammoth Elementary School			Mammoth Middle School			Mammoth High School		
	2004 2005	2005 2006	2006 2007	2004 2005	2005 2006	2006 2007	2004 2005	2005 2006	2006 2007
Enrollment	536	528	548	295	287	272	317	353	319
Average Class Size	22.6	22	21.5	25.3	26.9	24.9	21.7	26.9	24.9
Pupil-Teacher Ratio	19.1	18.5	18.3	20.3	20.5	21.2	17.2	17.7	15.6
<i>Source: California Department of Education Educational Demographics Unit DataQuest, http://dq.cde.ca.gov/dataquest/dataquest.asp, CAJA staff, January 15, 2008.</i>									

School Developer Fees

Pursuant to California Education Code Section 17620(a)(1), the governing board at any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the

²² James Maxey, Business Manager, Mammoth Unified School District, electronic mail correspondence, November 16, 2007.

²³ *Ibid.*

boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The MUSD currently charges developer fees of \$2.63 per square foot of residential development and \$0.42 per square foot of commercial development.²⁴ Provided in Section 65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on schools services.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services.

Project Impacts and Mitigation Measures

Impact PS-5 School Services

As discussed in Section IV.K, Population and Housing, of this Draft EIR, the Project has been designed to integrate 57 on-site, year-round dwelling units (24 condominiums and 33 affordable units). The Project is anticipated to generate 2.43 persons per household, which could result in approximately 139 new permanent residents.²⁵ It should be noted that the Town's seasonal/visitor population would not contribute to a need for school services. Current population patterns in the Town indicate that households similar to those proposed by the Project are not occupied year-round; therefore this is a conservative estimate. As stated previously, the schools that would serve the Project experience steady enrollment and are currently at or near capacity. According to the MUSD, based on the generation rate shown in Table IV.L-4, the Project has the potential to generate approximately 78 Kindergarten through Twelfth grade students. The estimated break down is 47 elementary students, four middle school students, and 27 high school students. As stated previously, this is a conservative estimate based on the Project's 57 new residential units being occupied by families with children residing in Mammoth Lakes on a fulltime year-round basis.

²⁴ James Maxey, Business Manager, Mammoth Unified School District, electronic mail correspondence CAJA staff, October 23, 2006.

²⁵ United States Census Bureau, Census 2000; State and County Quickfacts, website: www.census.gov, CAJA staff, January 10, 2008.

**Table IV.L-4
Student Generation Rates for MUSD**

Development Type	K-6 Elementary	7-8 Middle	9-12 High School
Single-Family	.4002	.0294	.0227

Source: James Maxey, Business Manager, Mammoth Unified School District, correspondence, January 17, 2008.

Based on the developer fees established by each of the school districts, the Project Applicant would be required to pay \$2.63 per square foot of residential development and \$0.42 per square feet of commercial development. As stated previously, provided in Section 65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of these required developer fees, Project impacts to school services would be ***less than significant*** and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact PS-6 Cumulative School Services

Implementation of the Project in conjunction with the related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would further increase the demand for school services. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. Though the Town's seasonal/visitor population would not contribute to a need for school services the Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation is likely overstated.

However, as with the Project, the applicants of the related projects would be required to pay developer fees to the MSUD; payment of these fees would fully mitigate any impact that the related projects would have on school services. As stated previously, the Project's impacts to school services would be less than significant. Therefore, cumulative impacts to school services would be ***less than significant*** and no mitigation measures are required.

MITIGATION MEASURES

Because the Project would not result in significant impacts on school services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to school services would be ***less than significant***.

4. PARKS & RECREATIONAL SERVICES

ENVIRONMENTAL SETTING

The Town of Mammoth Lakes Parks and Recreation Department manages over 73.78 acres of parkland accessible to residents and visitors in five active parks and open space/trail system (See Table IV.L-5). The Town owns and operates 14.26 acres of parkland and operates 27.52 acres of parkland under a Special Use Permit from the United States Forest Service (“USFS”). In addition, the Town and Mono County jointly operate Whitmore Park, which consists of approximately 32 acres of parkland leased from Los Angeles. The parks in Mammoth Lakes include Community Center Park, Mammoth Creek Park, Shady Rest Park, Trails End Park and Whitmore Park. The range of outdoor activities continues to expand and the Town currently has plans to expand its park and recreation facilities. The proposed expansion includes a recreation center, festival/cultural sites, improvements to the Shady Rest Park, Open Space/Parklands and a Winter Play area with parking. The proposed Shady Rest Affordable Housing project is a private development with a park element that also contributes to the overall new parks in the Town. In addition to parks, the Town has seven miles of off-road Class A bike trails totaling over six acres and numerous other nearby recreation opportunities such as Mammoth Mountain Ski Area, Smoky Bear Flat, Lakes Basin, Devil’s Postpile National Monument, Red’s Meadow, Bodie State Historic Park, Inyo National Forest, Mono Lake Tufa State Reserve, and the John Muir and Ansel Adams Wilderness Areas. Additionally, the eastern entrance to Yosemite National Park is 32 miles to the north of Mammoth Lakes.

**Table IV.L-5
Park Areas Near the Project Site**

Name	Size	Amenities	Approximate Distance from Project Site (miles)
Community Center Park	5.18 acres	- Community Center - children's daycare - children's play area - six tennis courts - picnic tables - walking paths - restrooms - paved parking	0.21
Mammoth Creek Park East & West	19.97 acres	- Hayden Cabin museum - picnic tables - restrooms - children's play area - art sculpture - walking trails - biking trails - paved parking	1.2
Shady Rest Park	12.52 acres	- two soccer fields - three softball fields - restrooms - two sand volleyball courts - picnic areas/covered pavilion - a play area - paved parking	1.3
Trails End Park ⁽¹⁾	4.11 acres	- Volcom Brother's Skate Park - children's play area - water play area - horseshoe pits - restrooms - picnic pavilion	2
Whitmore Park	+/-32 acres	- three baseball/softball diamonds - restrooms - picnic/play areas - community swimming pool - paved parking	9
<p><i>Notes:</i> (1) <i>Currently under development.</i></p> <p><i>Source:</i> Town of Mammoth Lakes, http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm, CAJA staff, January 15, 2008. Craig Olson, Senior Planner, Town of Mammoth Lakes, correspondence, CAJA staff, July 10, 2006. Steve Speidel, Principal Planner, Town of Mammoth Lakes, correspondence via Jen Daugherty, Assistant Planner, with CAJA staff, July 24, 2007.</p>			

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the proposed project could have a significant environmental impact on parks and recreation if it would:

- (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services.
- (b) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- (c) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Project Impacts and Mitigation Measures

Impact PS-7 Park and Recreational Services

As discussed in Section IV.K, Population and Housing, of this Draft EIR, implementation of the proposed Project would result in a permanent population of 139 persons and a seasonal/visitor population of 1,388 persons, totaling 1,527 PAOT. The PAOT population includes permanent residents, transient/seasonal residents and visitors. Thus, following the Town's parkland dedication standard of five acres of parkland per 1,000 residents (permanent and seasonal),²⁶ the Project would create an additional demand of approximately seven acres²⁷ for parks and recreational services. Current population patterns in the Town indicate that households similar to those proposed by the Project and hotel rooms are not at full occupancy year-round, therefore this is a conservative estimate.

The Project is viewed as a pedestrian-oriented activity center with hotel uses, residential uses, commercial/retail uses, entertainment facilities, outdoor use areas, and multiple options for recreational and public amenities. These may include office and personal services such as real estate sales, reservations, beauty salon, child care facilities, meeting/conference rooms, a pool/spa/fitness area, a restaurant/bar, and a public plaza. As stated in Section III, Project Description, of this Draft EIR, recreation features associated with the Project's three hotels may include swimming pools, bicycles, spa

²⁶ Town of Mammoth Lakes 2005 General Plan Update FPEIR, Recreation Element, May 2007, p. 4-300.

²⁷ Calculation of parkland dedication acreage is .005 (5 acres/1,000 persons) multiplied by 1,395 PAOT (6.975 acres).

facilities and fitness areas. Pursuant to Policy 5 of the Parks and Recreation Element of the Specific Plan, Project residents of the on-site condominiums and affordable housing units would be provided private and separate recreational amenities.

The Project's proposed recreational and public amenities (as listed above) in conjunction with the Town's current facilities and the collection of DIFs²⁸ that support the Town's park and recreation fund (as required by Town Municipal Code 15.16.081), would be adequate to accommodate the Project's demand for parks and recreational services.²⁹ As development occurs within the Project area, Developer Impact Fees will be paid to the Town to offset the recreational facilities and maintenance. No additional parks or recreational facilities beyond what are proposed would be required. Therefore, based on Town requirements, Project impacts to park and recreational services would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact PS-8 Park and Recreational Services

As shown in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR, the related projects in the Town are primarily residential projects. Residential projects typically have the greatest impact on parks and recreational facilities, because they generate the greatest users of parks and recreational facilities – families with children. As discussed in Section IV.K, Population and Housing, of this Draft EIR, PAOT is used as a measurement because of the large visitor population in the Town at any given time. PAOT associated with the related projects (18,120) combined with the proposed Project's PAOT (1,527), would amount to 19,647 PAOT for cumulative residential development. The Town has proposed to expand its park and recreation facilities to allow the Town to maintain its standard of five acres per 1,000 residents. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation is likely overstated.

Although new facilities have been proposed by the Town, construction has not begun, and therefore these facilities do not serve to mitigate the immediate need for more parks. However, as with the Project, the applicants of the related projects would be required to pay DIFs that support the Town's park and recreation fund; payment of these fees would fully mitigate any impact that the related projects would have on park and recreational services. Therefore, cumulative impacts to the Town's park and recreation services would be *less than significant* and no mitigation measures are required.

²⁸ Appendix K of this Draft EIR includes the Town's current Developer Impact Fee Schedule dated June 2007.

²⁹ Town of Mammoth Lakes Municipal Code Chapter 15.16 Section 15.16.085 part E, CAJA staff, March 5, 2008.

MITIGATION MEASURES

Because the Project would not result in significant impacts on park and recreational services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to the Town's park and recreation services would be *less than significant*.

5. SNOW REMOVAL SERVICES

ENVIRONMENTAL SETTING

The Town of Mammoth Lakes Public Works Department is responsible for snow removal on the majority of non-state and non-federal public roadways. Roadway maintenance and snow removal on private roads and private property is the responsibility of the land owners. The Town owns and operates two plow trucks and nine Caterpillar loaders, five of which are equipped with plows and four with blowers. As necessary, snow removal occurs 24 hours a day during two 12-hour shifts. On average six loaders are employed during the day shift and eight on the night shift. Snow is stored along roadways and in vacant lots. The Town currently requires a ten-foot roadside easement for snow storage on roadways with less than 60 feet of right-of-way. In a large storm event, the easement alone would not be capable of containing the entire quantity of the snow. Snow removal uses up to two thirds of each year's total maintenance and improvement budget. During intense snow storm periods, equipment and facilities have been overburdened and unable to maintain the roads clear of snow.³⁰

Caltrans provides snow removal services on State Route 203 ("SR 203") from the junction of U.S. Highway 395 to the Caltrans Minaret Maintenance Station at postmile 2.4. In general, Caltrans is able to blow snow and store snow within their existing right-of-way. SR 203 borders the Project's Site 1 on the east and Site 3 on the north. Snow that accumulates at the Lake Mary/Minaret/Main intersection is pushed into the right-of-way at the southeast quadrant of the intersection. Snow on Main Street is blown to the north and south sides of the street, with the majority being blown to the south side. At times, snow is also hauled and stored east of town and south of SR 203 adjacent to Forest Service Land. Caltrans anticipates no change to their current SR 203 snow removal activities.³¹ Caltrans has a 200-foot wide right of way along the Main Street portion of SR 203. The State originally acquired this width because of the need for snow storage. Minaret Road north of Main Street is also a part of the SR 203. That right of way varies in width but is typically 75 to 85 feet wide.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the

³⁰ Town of Mammoth Lakes, 2005 General Plan Update DPEIR, website: <http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm>, CAJA staff, February 26, 2008.

³¹ Gayle Rosander, IGR/CEQA Coordinator, Caltrans D-9, correspondence, CAJA staff, October 25, 2007.

construction which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public facilities.

Project Impacts and Mitigation Measures

Impact PS-9 Snow Removal Services

As discussed in Section IV.K, Population and Housing, of this Draft EIR, the Project has been designed to integrate 57 on-site, year-round dwelling units. The Project is anticipated to generate 2.43 persons per household, which could result in approximately 139 new residents.³² Current population patterns in the Town indicate that households similar to those proposed by the Project and hotel rooms are at full occupancy year-round, therefore this is a conservative estimate.

According to the Specific Plan, the increase in paved areas due to street improvements and the development of the pedestrian plaza would result in greater snow removal requirements. The existing major public roads that serve the Project site are Minaret Road, Main Street/Lake Mary Road, and Canyon Boulevard. New internal access roads would be created on the Project site. The internal roadway system would be privately owned and maintained.

The management of snow at the Project site would be the sole responsibility of Mammoth Crossing property owners or their designated representative association. Snow management would be addressed with each building to ensure that residents and visitors are provided safe and convenient access to and from lodging and within the public use areas throughout the winter season. Ground and roof level snow storage areas would be provided on each of the three Project sites. Snow management would be designed in accordance with Town Municipal Code Chapter 12.16 "Snow Removal" regulations. The Project Applicant would be required to submit a Snow Management Plan ("SMP") for approval by the Town and the Mammoth Lakes Fire Protection District. Geothermal heat will be considered as a source for snowmelt in major plaza areas. Methods to prevent snow and ice build-up such as snowplowing, cinder application and installation of heat traced pavement on adjacent roadways (i.e., Lake Mary Road, Minaret Road and Main Street) which could result in hazardous driving conditions due to shading by the Projects proposed development would be included in the SMP. The SMP is required to be submitted and approved prior to the issuance of building permits by the Town. Therefore, Project impacts to the Town's snow removal services would be ***less than significant*** and no mitigation measures are required.

³² United States Census Bureau, Census 2000; State and County Quickfacts, website: www.census.gov, CAJA staff, January 10, 2008.

CUMULATIVE IMPACTS

Impact PS-10 Snow Removal Services

The Project in conjunction with the related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would not cumulatively increase the demand for snow removal services in the Town. As shown in Table II-1, the related projects in the Town are primarily private projects and therefore, as with the Project, the private land owners would be responsible for their own snow removal services. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation is likely overstated.

As development in the Town reaches build-out, improvements would be made to the fronting streets such that there would be an impact to the snow removal operations performed by the Town and by Caltrans for SR 203 which is concurrent with Main Street to the Lake Mary Road-Main Street/Minaret Road intersection and Minaret Road north of the Lake Mary Road-Main Street/Minaret Road intersection. The addition of streetlights, landscaping and irrigation within the right-of-way, driveways, public sidewalks and the heat-trace within the public sidewalks will increase the effort and the costs for maintenance. The related projects requiring the need for such improvements would be required to be annexed into a benefit maintenance district to cover these costs.³³

However, as private land owners would be responsible for their own snow removal services, and each of the related projects, similar to the Project, would be required to pay DIFs, impacts to snow removal services in the Town would be fully mitigated. As stated previously, the Project's impacts to snow removal services would be less than significant. The implementation of the related projects would not require the need for new staff or new or altered public works facilities. Therefore, cumulative impacts to snow removal services would be ***less than significant*** and no mitigation measures are required.

MITIGATION MEASURES

Because the Project would not result in significant impacts on snow removal services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to snow removal services would be ***less than significant***.

³³ Correspondence with Jeff Mitchell, Town of Mammoth Lakes Engineering Services Division, June 23, 2008.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

M. TRAFFIC AND CIRCULATION

INTRODUCTION

This section addresses the subject of traffic and circulation with respect to the Mammoth Crossing Project (“Project”) and includes an assessment of potential impacts associated with the development of the Project on the existing circulation system of the Town of Mammoth Lakes (“Town”). The information in this section is based primarily on the Traffic Impact Analysis for the Project prepared by LSA Associates, Inc. in May 2008 (included in Appendix I of this Draft EIR).

ENVIRONMENTAL SETTING

Project Location

The Project is proposed to be located on the northwest, southwest, and southeast corners of the intersection of Minaret Road and Lake Mary Road-Main Street in the northwest portion of the Town. In Section III, Project Description, of this Draft EIR, Figure III-12 illustrates vehicle circulation of the Project area.

Existing Parking Conditions

Parking on Site 1, 2 and 3 consists of limited surface parking. According to the Town, parking conditions for land uses in the North Village area are deficient.¹

Existing Bicycle and Pedestrian Conditions

Existing conditions throughout the Project’s three sites do not currently provide pedestrian access or pedestrian and bicycle connectivity within the North Village Specific Plan area and do not link to the larger Town-wide existing and planned recreational trail network, which includes pedestrian trails, bike lanes and sidewalks that are adjacent to major roadways. There are no existing bicycle lanes or other bicycle facilities on the Project’s three sites. The only existing sidewalk is located along Canyon Boulevard, which will be replaced with a new sidewalk with development of the Project.

Existing Transit Service

The Mammoth Mountain Transit Red Line, Blue Line, Yellow Line, Orange Line, Purple Line, and the Rainbow Evening Line currently serve the Project area. In addition, the Town’s Night Trolley also serves the Project area. All transit lines operate from late November through mid-April, and provide bus stops adjacent to the Project site on the northeast and southeast corner of Minaret Road/Lake Mary Road. The

¹ Correspondence with Ellen Clark, Senior Planner, Town of Mammoth Lakes, June 23, 2008.

Town has recently implemented a year-round Mammoth Lakes Transit system in the vicinity of the Project site. The Town Trolley provides bus stops on Old Mammoth Road and provides service to The Village via Old Mammoth Road and Main Street every 30 minutes from 9:00 a.m. to 10:00 p.m. The Midtown Lift provides bus stops on Chateau Road and also provides service to The Village via mid-Mammoth every 30 minutes Monday through Friday from 7:00 a.m. to 6:00 p.m. and on weekends from 9:00 a.m. to 6:00 p.m.

Red Line provides service to North Village, Snowcreek Athletic Club, and the Main Lodge via Old Mammoth Road, Minaret Road, Chateau Road, Main Street, and Canyon Boulevard. The Red Line service operates every 15 minutes from 7:00 a.m. to 5:30 p.m., 7 days a week.

Blue Line provides service to Canyon Lodge area via Hillside Drive, Minaret Road, Lakeview Boulevard, Lake Mary Road, and Canyon Boulevard. The Blue Line service operates every 15 minutes from 7:00 a.m. to 5:30 p.m., 7 days a week.

Yellow Line provides service to Eagle Lodge and the Village via Hillside Drive, Forest Trail, Minaret Road, Lakeview Boulevard, Lake Mary Road, Kelly Road, Majestic Pines Drive, Meridian Boulevard, and Canyon Boulevard. The Yellow Line service operates every 15 minutes from 7:30 a.m. to 5:30 p.m., 7 days a week.

Orange Line provides service to the Village and Tamarack Cross Country Ski Center via Hillside Drive, Forest Trail, Minaret Road, Lakeview Boulevard, Lake Mary Road, and Canyon Boulevard. The Orange Line service operates from the Village to Tamarack every 15 minutes from 8:30 a.m. to 4:30 p.m., 7 days a week, and from Tamarack to the Village every hour from 9:00 a.m. to 5:00 p.m., 7 days a week.

Purple Line currently provides service from the Village to Main Street and Mid-Mammoth via Hillside Drive, Forest Trail, Minaret Road, Lake Mary Road, Canyon Boulevard, Main Street, Lupin Street, Dorrance Drive, Manzanita Road, and Meridian Boulevard. The Purple Line service operates every 30 minutes from 7:00 a.m. to 6:00 p.m., Monday through Friday, and every 30 minutes from 9:00 a.m. to 6:00 p.m., Saturday and Sunday. In addition, the Purple Line is planned to provide bus stops adjacent to the Project site.

Rainbow Evening Line provides service from the Village to Canyon Lodge, Eagle Lodge, Meridian Boulevard, and Old Mammoth Road via Hillside Drive, Forest Trail, Minaret Road, Lakeview Boulevard, Lake Mary Road, Kelly Road, Majestic Pines Drive, Meridian Boulevard, Azimuth, Sierra Nevada Road, and Canyon Boulevard. The Rainbow Evening Line service operates every 60 minutes from 6:00 p.m. to 12:00 a.m., 7 days a week.

Night Trolley provides service to North Village and Snowcreek Athletic Club via Old Mammoth Road, Minaret Road, Chateau Road, Main Street, and Canyon Boulevard. The Night Trolley service operates every 15 minutes from 5:30 p.m. to 1:00 a.m., 7 days a week.

REGULATORY SETTING

Mono County Local Transportation Commission

The Mono County Local Transportation Commission (“MCLTC”) is the designated Regional Transportation Planning Agency for Mono County. Its membership includes three members of the Town of Mammoth Lakes Town Council and three members of the Mono County Board of Supervisors. The Director of Caltrans District 9 serves as an ex-officio member of the MCLTC. The MCLTC acts as an autonomous agency in filling the mandates of the Transportation Development Act.

The goal of the Mono County Regional Transportation Plan (“Transportation Plan”) is to provide and maintain a transportation system which provides for the safe, efficient and environmentally sound movement of people, goods and services, and which is consistent with the socioeconomic and land use needs of Mono County.² The Transportation Plan includes the existing highway and road system, as well as the bikeway/trail component and air travel.

Senate Bill 45 expanded the role of the MCLTC with additional responsibilities for project monitoring with significant, additional and discretionary funding for transportation projects and increased transportation planning responsibilities. The primary duties of the MCLTC consist of the following:

- Every four years, prepare, adopt and submit a Regional Transportation Plan (“RTP”), and every two years prepare a Regional Transportation Improvement Program (“RTIP”) for the Department of Transportation (Caltrans) and the California Transportation Commission;
- Annually, review and comment on the Transportation Improvement Plan contained in the State Transportation Improvement Program (“STIP”);
- Provide ongoing administration of the Transportation Development Act (“TDA”) Funds;
- Annually, prepare and submit the Overall Work Program; and
- Periodically allocate funds for Transportation Enhancement Activities (“TEA”).

² *Mono County Local Transportation Commission, Transportations Issues, website: http://www.monocounty.ca.gov/cdd%20site/LTC/lc_home.html, January 22, 2008.*

METHODOLOGY

Project Study Intersections and Forecast Scenarios

Analysis Scenarios

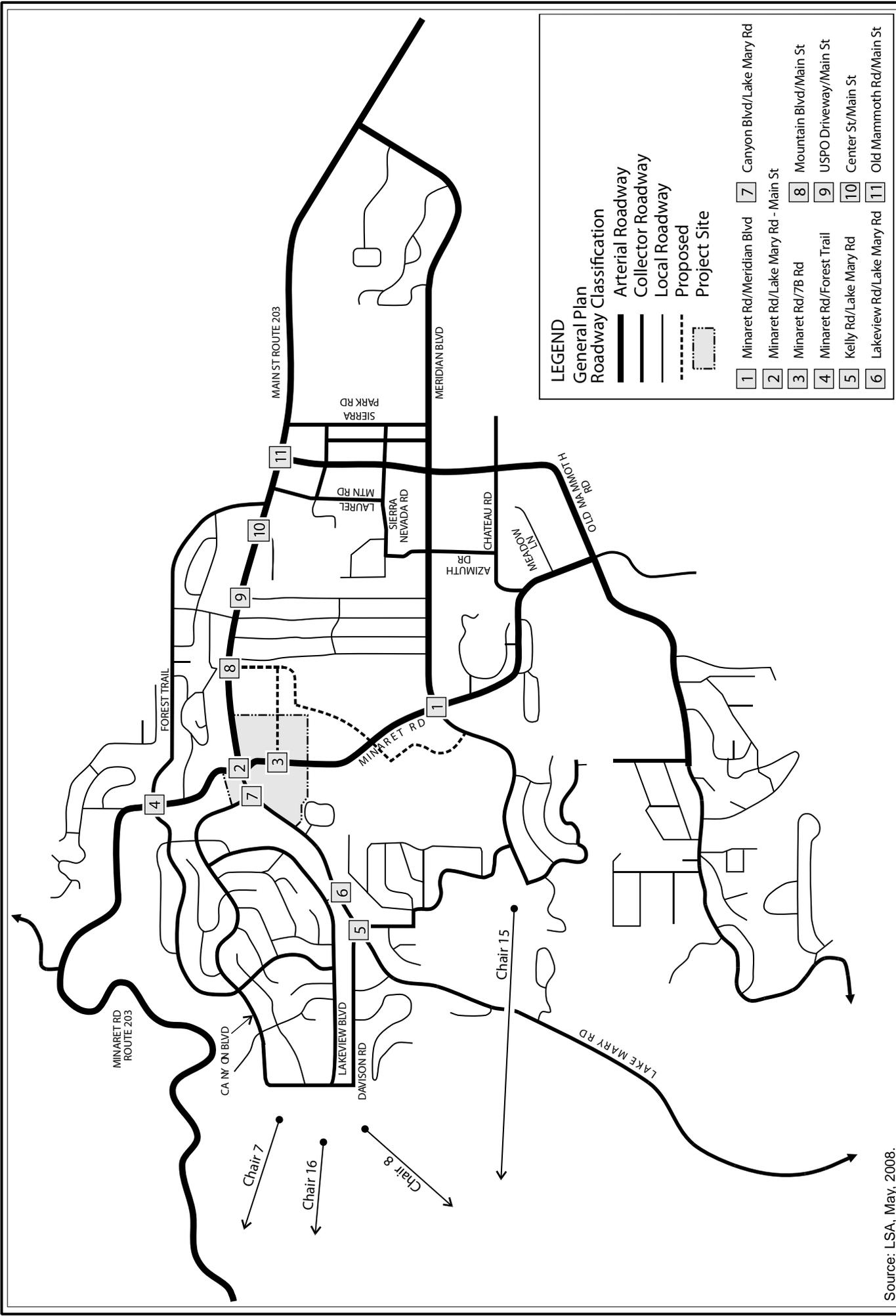
Five analysis scenarios were utilized in the Traffic Impact Analysis:

- Existing Conditions (2008)
- Cumulative Baseline Conditions (existing plus approved projects [2009])
- Existing Plus Project Conditions
- Cumulative Plus Project Conditions
- Long-Range Town Buildout: Existing General Plan
- Long-Range Town Buildout: Existing General Plan Plus Project

Project Study Intersections

Intersection operations were evaluated for eleven intersections for the analysis scenarios described above. Figure IV.M-1 shows the study area intersections and *Town of Mammoth Lakes General Plan* (“General Plan”) Roadway Classifications for the surrounding circulation system.

- | | |
|--|---|
| 1) Minaret Rd./Meridian Blvd. | 7) Canyon Blvd./Lake Mary Rd. |
| 2) Minaret Rd./Lake Mary Road-Main St. | 8) Mountain Blvd./Main St. |
| 3) Minaret Rd./7B Rd. | 9) United States Post Office (“USPO”) Driveway/Main St. |
| 4) Minaret Rd./Forest Trail | 10) Center St./Main St. |
| 5) Kelly Rd/Lake Mary Rd. | 11) Old Mammoth Rd./Main St. |
| 6) Lakeview Rd./Lake Mary Rd. | |



LEGEND

General Plan Roadway Classification

- Arterial Roadway
- Collector Roadway
- Local Roadway
- Proposed
- Project Site

- | | | | |
|---|-----------------------------------|----|--------------------------|
| 1 | Minaret Rd/Meridian Blvd | 7 | Canyon Blvd/Lake Mary Rd |
| 2 | Minaret Rd/Lake Mary Rd - Main St | 8 | Mountain Blvd/Main St |
| 3 | Minaret Rd/7B Rd | 9 | USPO Driveway/Main St |
| 4 | Minaret Rd/Forest Trail | 10 | Center St/Main St |
| 5 | Kelly Rd/Lake Mary Rd | 11 | Old Mammoth Rd/Main St |
| 6 | Lakeview Rd/Lake Mary Rd | | |

Source: LSA, May, 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.M-1
Study Area Intersections & Circulation System

Project Analysis Methods

Typical winter Saturday peak-hour baseline conditions were used to analyze traffic impacts for the existing and cumulative (existing plus approved projects) conditions. The “design” day used in this study is a typical winter Saturday, which occurs 15 to 20 times a year. The typical winter Saturday represents a conservative approach to traffic planning and mitigation.

Typical winter Saturday peak-hour traffic counts at all study area intersections were conducted by National Data & Surveying Services on Saturday, February 2, 2008. Observations showed that winter weather conditions prevailed and below-average rates for skiers and occupancy (11,796 total skiers and 76 percent occupancy) were reported. Traffic counts were retaken at control intersections of Minaret Road/Main Street and Old Mammoth Road/Main Street on Saturday, February 9, 2008, by Triad/Holmes Associates. The total reported skiers and occupancy on February 9th was 17,559 and 98 percent, respectively. Counts at these two locations resulted in an average increase of 43 percent from the previous count data. The measured 43 percent growth was then applied to the intersections not recounted to represent typical winter Saturday conditions.

Typical winter Saturday daily and p.m. peak-hour trips were generated using the generated by using standard trip rates from the Town and the Institute of Transportation Engineers (“ITE”), *Trip Generation Manual, 7th Edition*, observed rates from the Village Lodges (i.e., Grand Sierra, White Mountain, and Lincoln House) parking garages, and confirmed by counts from the Westin Hotel. Trip distribution and assignment were determined by the relationship of prominent attractions to the Project. The existing trip count data is provided in Appendix A of the Traffic Impact Analysis provided in Appendix I of this Draft EIR.

A cumulative scenario has been included in this analysis to account for traffic from approved development projects (i.e., related projects) that would be added to the existing circulation system. A list of 40 approved projects was supplied by Town staff (refer to Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR). The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. LSA Associates, Inc. determined related projects with more than 10 units have the potential to impact the circulation system. Of the 40 approved projects, 33 have more than 10 units, or an equivalent trip generation. Accordingly, 33 related projects were used in this analysis.

Study intersection operations were evaluated using level of service (“LOS”) calculations as discussed below.

LOS Criteria

The operations of intersections, roadway segments, and freeway segments are described with the term “level of service” (“LOS”). LOS is a qualitative description of traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver. Six levels of service are defined ranging from LOS

A (indicating free flow traffic conditions with little or no delay) to LOS F (representing over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). LOS E corresponds to operations “at capacity.” When volumes exceed capacity, stop-and-go conditions result and operations are designated as LOS F.

The Town’s LOS standard for intersections is LOS D, which corresponds to a volume-to-capacity (V/C) ratio of 0.90 for signalized intersections. An intersection is considered satisfactory when it operates at LOS A–D. An unsignalized intersection would be considered deficient if an individual minor street movement operates at LOS E or F and a total minor approach delay exceeds four vehicle hours for a single-lane approach and five vehicle hours for a multilane approach, consistent with the General Plan Update Draft EIR Traffic Analysis (2004).

A complete description of the meaning of LOS can be found in the Transportation Research Board Special Report 209, *Highway Capacity Manual*, which also establishes LOS A–F. Brief descriptions of the six LOS, as abstracted from the Manual, are shown in Table IV.M-1. The LOS criteria for unsignalized and signalized intersections are shown in Table IV.M-2.

For all study area intersections, the *2000 Highway Capacity Manual* (“HCM 2000”) analysis methodologies were used to determine intersection LOS. All LOS were calculated using the Traffix Version 7.8 software, which uses the 2000 HCM methodologies.

**Table IV.M-1
Intersection LOS Descriptions**

LOS	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally, drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced-flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Source: Transportation Research Board Special Report 209, Highway Capacity Manual

**Table IV.M-2
Level of Service Parameters**

Level of Service	Signalized Intersections Delay (seconds)	Unsignalized Intersections Delay (seconds) ⁽¹⁾
A	≤ 10.0	≤ 10.0
B	> 10.0 and ≤ 20.0	> 10.0–15.0
C	> 20.0 and ≤ 35.0	> 15.0–25.0
D	> 35.0 and ≤ 55.0	> 25.0–35.0
E	> 55.0 and ≤ 80.0	> 35.0 seconds/vehicle and > 4.0 hour cumulative delay for single-lane or > 5.0 hour cumulative delay for two-lane approach
F	> 80.0	

Note:
(1) If the intersection exceeds LOS D criteria, the hourly total criteria (four vehicle-hours for a single-lane and five vehicle-hours for a multilane approach) standard applies.

Source: Transportation Research Board Special Report 209, Highway Capacity Manual.

Signalized Intersections and Unsignalized Intersections

LOS for signalized and unsignalized intersections is determined using the methodology set forth in the 2000 HCM, where the calculation of LOS is dependent on the occurrence of gaps in the through traffic flow of the major street. Using data collected describing the intersection configuration and traffic volumes at the study area intersections, the delay (in seconds per vehicle) of each minor street or major street conflicting movement was estimated. These delays were used to calculate the intersection's average delay per vehicle, which was used to determine the intersection LOS. It should be noted that at two-way, stop-controlled intersections, the intersection delay refers only to the delay experienced by vehicles on the stop-controlled minor street. As a result, at locations where a higher volume of through traffic is experienced on the major street, fewer gaps will be experienced in the through traffic flow of the major street. As a result, the addition of only one or two vehicles to the stop-controlled minor street could result in the rapid deterioration of LOS at that intersection, although most vehicles at the intersection do not experience any delay.

The LOS threshold at unsignalized intersections can be easily exceeded when only a few vehicles experience a delay greater than 50 seconds. Therefore, the Town has identified unsignalized intersection LOS standards that allow greater delay on low-volume approaches. These thresholds are used as delay exceeds the 35-second threshold. Once that threshold is reached, the four vehicle-hour and five vehicle-hour standard applies.

Existing Traffic Conditions (Winter 2008)

The existing number of lanes and intersection control devices for Project area intersections are shown in Figure IV.M-2. Existing typical winter Saturday peak-hour traffic volumes at each study area intersection and average daily traffic ("ADT") on the roadways are shown in Figure IV.M-3. Existing levels of

service at study area intersections are shown in Table IV.M-3. The LOS worksheets for the existing conditions are presented in Appendix I to this Administrative Draft EIR.

**Table IV.M-3
Existing (2008) Typical Winter Saturday Intersection LOS**

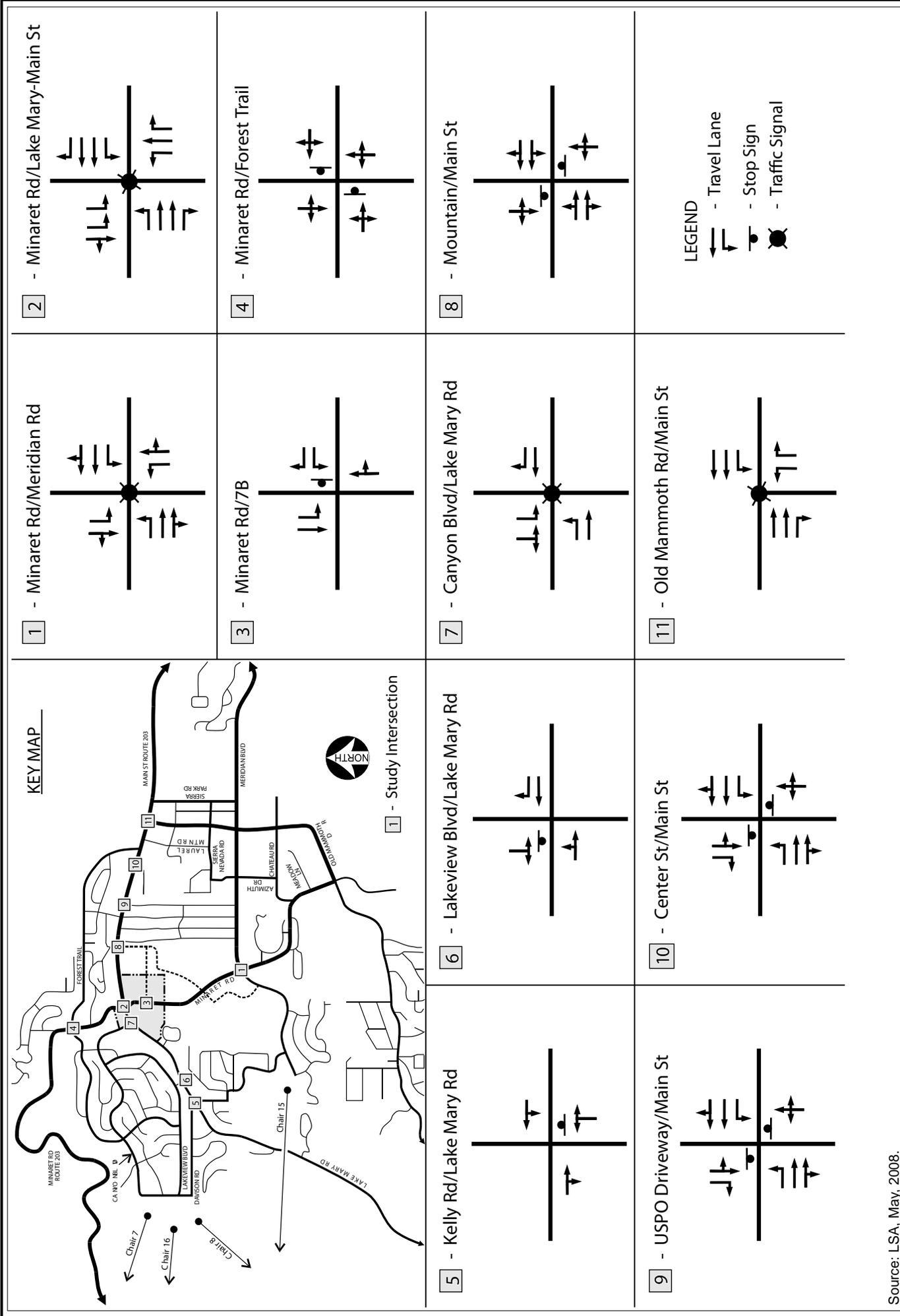
Intersection	Control⁽¹⁾	Delay (seconds)	LOS⁽²⁾
Minaret Rd./Meridian Blvd.	Signal	19.9	B
Minaret Rd./Lake Mary Rd.-Main St.	Signal	21.9	C
Minaret Rd./7B Rd.	TWSC	<i>Future Intersection</i>	-
Minaret Rd./Forest Trail	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F
Kelly Rd./Lake Mary Rd.	TWSC	11.3	B
Lakeview Rd./Lake Mary Rd.	TWSC	10.5	B
Canyon Blvd./Lake Mary Rd.	Signal	12.1	B
Mountain Blvd./Main St.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F
USPO ⁽³⁾ Driveway/Main St.	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F
Center St./Main St.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F
Old Mammoth/Main St.	Signal	14.1	B

Notes:

(1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.
(2) LOS = level of service
(3) USPO = United States Post Office
(4) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

Source: Traffic Impact Analysis prepared by LSA in May 2008.

As shown in Table IV.M-3, all study area intersections currently operate within or below the Town's threshold of significance in the existing condition with the exception of USPO Driveway/Main Street. The Town is planning the installation of a traffic signal at the time of the preparation of this Draft EIR.



Source: LSA, May, 2008.

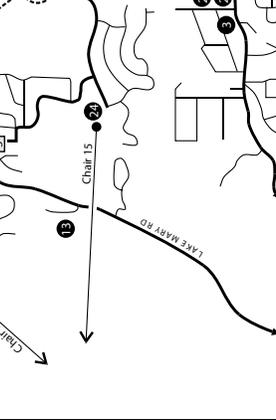
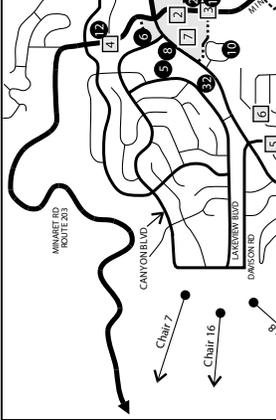
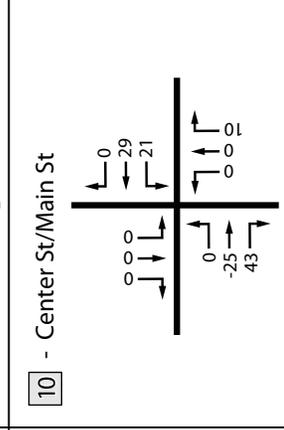
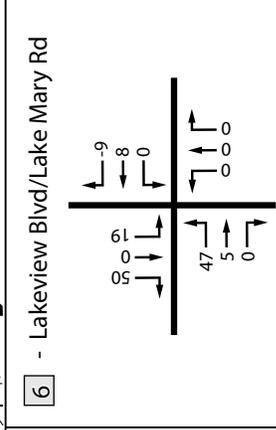
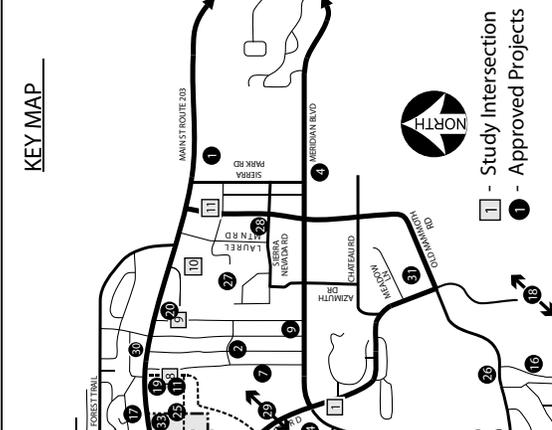
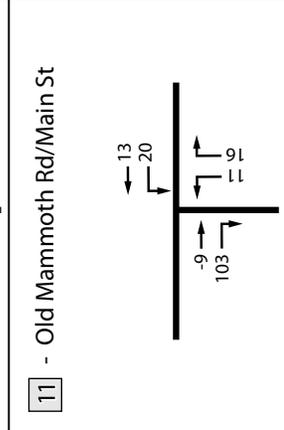
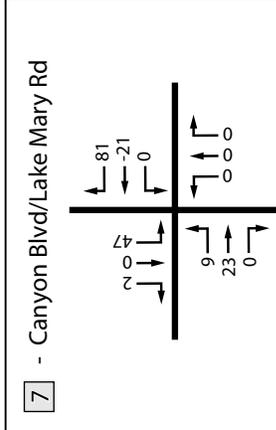
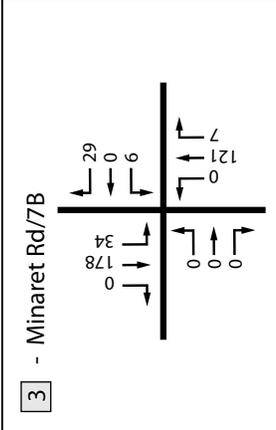
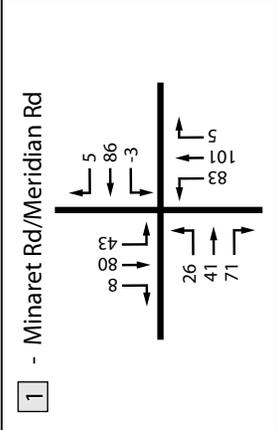
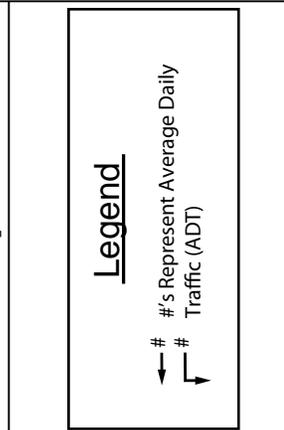
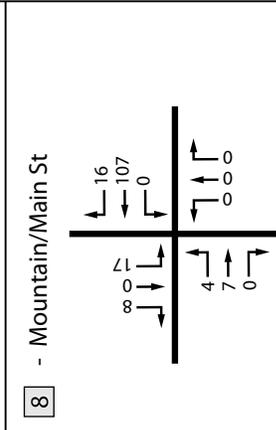
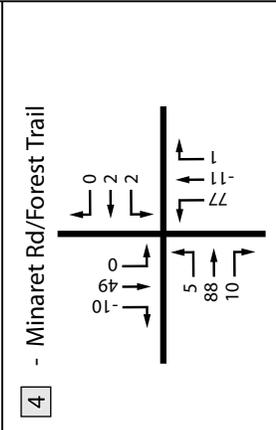
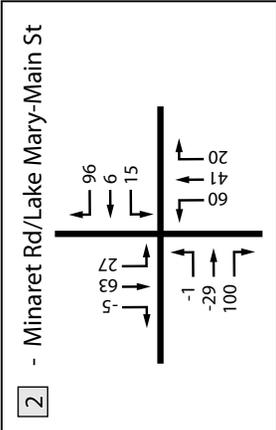
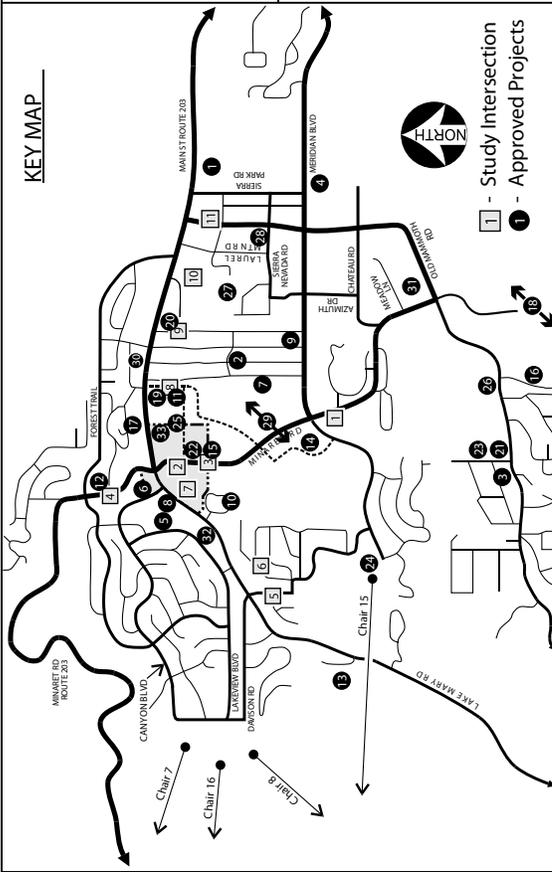
Cumulative (Existing Plus Approved Projects) Conditions

To forecast background traffic conditions, traffic volumes from approved projects in the vicinity of the Project were added to existing traffic volumes. In consultation with the Town and LSA, Associates, Inc., the related projects list (see Table II-1 of the Environmental Setting section of this Administrative Draft EIR) was modified slightly for the traffic analysis. The modified list includes approved projects with more than 10 units.

The cumulative projects plus existing conditions were developed by LSC Transportation Consultants utilizing the Town's traffic model. The growth in volumes from the existing modeled volumes to the 2009 cumulative baseline volumes were then determined and added to the existing ground counts to provide a 2009 cumulative baseline condition without Project. The location of the cumulative projects along with the traffic volumes contributed to study area intersections by the cumulative projects are illustrated in Figure IV.M-4. The cumulative baseline traffic volumes at each intersection are illustrated in Figure IV.M-5. A level of service analysis at study area intersections was prepared for the cumulative baseline condition. The cumulative baseline LOS is shown in Table IV.M-4. The LOS worksheets for the cumulative baseline conditions are included in Appendix I to this Draft EIR.

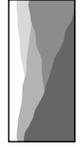
With improvements, all study area intersections are forecast to operate within or below the Town's threshold of significance in the cumulative condition (as shown in Table IV.M-4). The traffic on Forest Trail east of Minaret Road, where cumulative development is anticipated to potentially cause additional cut-through traffic, requires annual monitoring through the previously established Forest Trail Traffic Monitoring Program ("Monitoring Program") which was established as a mitigation measure for the North Village Specific Plan EIR prepared in October 2007. The annual monitoring of Forest Trail is intended to track any changes to cut-through traffic. If cut-through traffic increases as a result of the Project were identified via the Monitoring Program, Project cut-through impacts would be adequately addressed by the requirements and required mitigation measures would be implemented in compliance with the Monitoring Program. Potential mitigation measures could include the following:

- Modifications to traffic signal phasing on Main Street and Minaret Road;
- Stop signs along Forest Trail and Sierra Boulevard, Pinecrest Road, Grindelwald Road and Berner Street;
- No left turns from southbound traffic on southbound Sierra Boulevard to Main Street during winter months: possibly limit to afternoon peak hours only; and
- Other turn restrictions, such as no east bound through movement at the Forest Trail/Berner Street intersection would address this issue but also restrict residences in the immediate area.



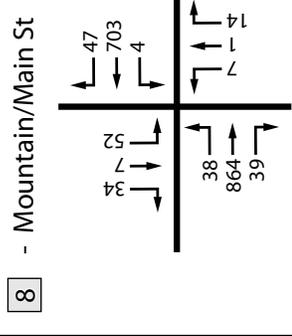
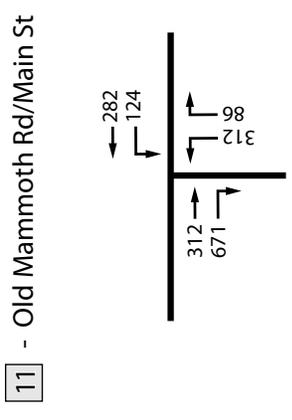
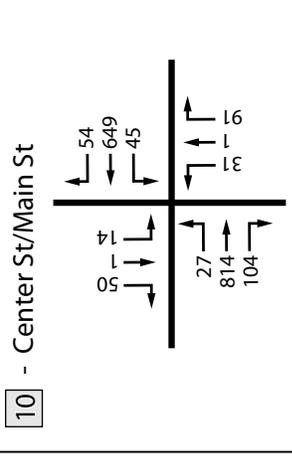
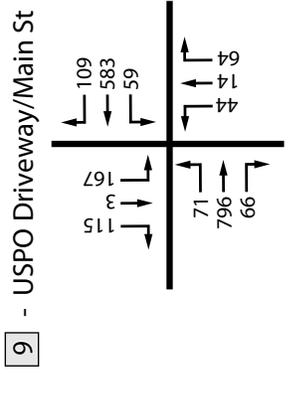
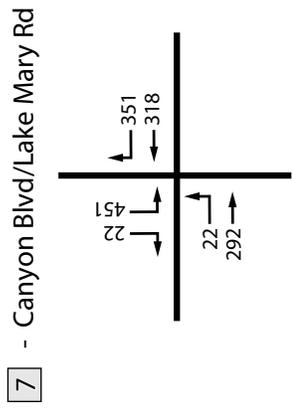
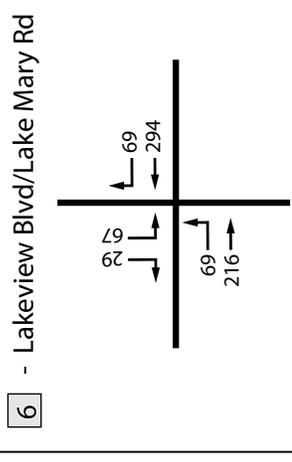
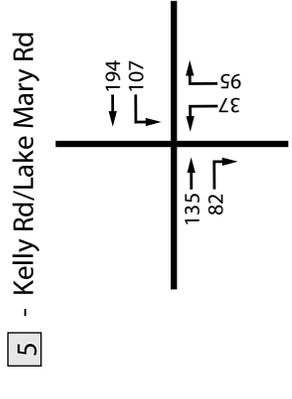
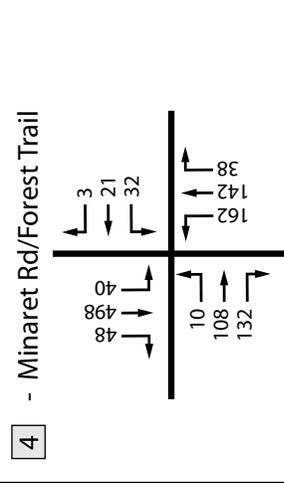
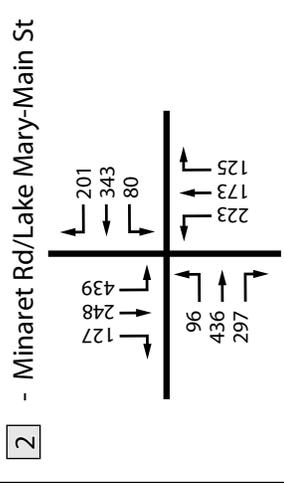
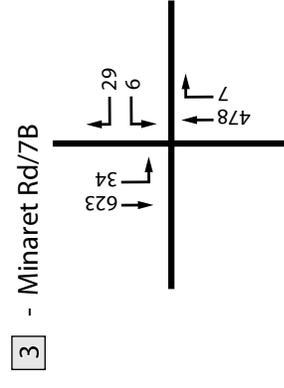
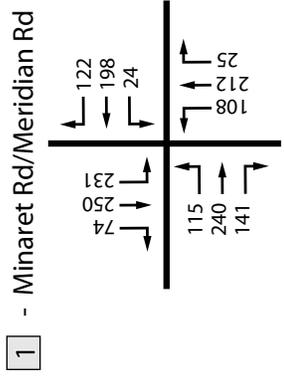
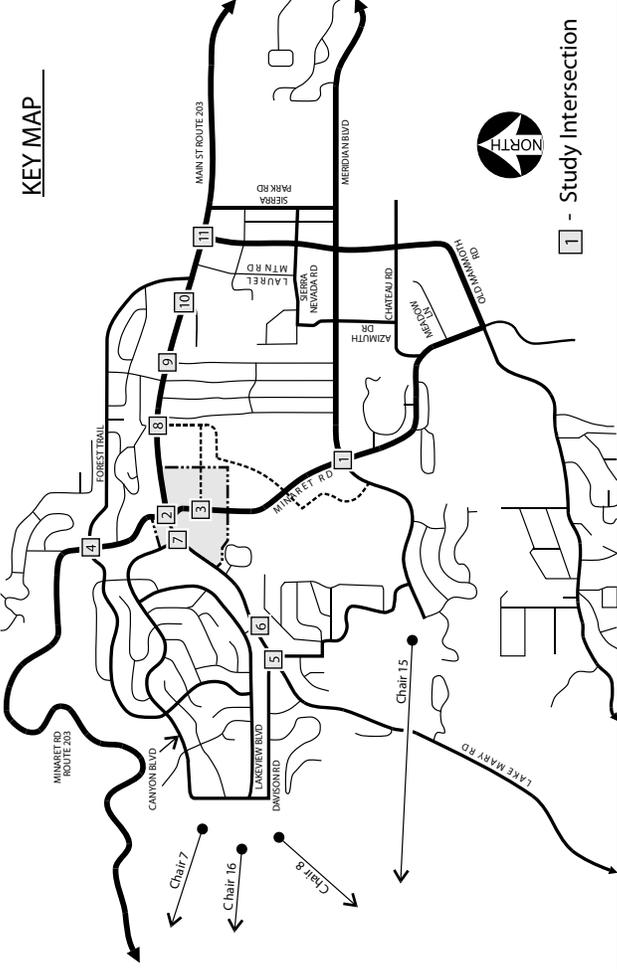
- Approved Projects Key**
- 1 Tavern Road Park and Ride
 - 2 The Jeffries
 - 3 Tosca/Big Air Mountain
 - 4 Mammoth Lakes Foundation
 - 5 Monache (Westin)
 - 6 80/50 Timeshare Condos
 - 7 Tallus Timeshare Condos
 - 8 Mammoth Hillside
 - 9 Mammoth Lakes Family Housing
 - 10 Fairway 4/5 (Woodwinds)
 - 11 Sierra Star 4b Housing
 - 12 Intrawest South Hotel
 - 13 Altis
 - 14 Fairway 16 (Solstice)
 - 15 Stonegate
 - 16 Snowcreek VI
 - 17 Mammoth View
 - 18 Snowcreek VIII
 - 19 Mammoth Gateway
 - 20 Manzanita Apartments
 - 21 Aspen Village Phase I
 - 22 Mammoth Crossing (Lodestar)
 - 23 Aspen Village Phase II
 - 24 Eagle Lodge
 - 25 3599 Main Street
 - 26 Snowcreek VII
 - 27 Shady Rest
 - 28 Clearwater Mammoth
 - 29 Sierra Star Master Plan
 - 30 Grey Eagle
 - 31 The Sherwin
 - 32 Ice Rink
 - 33 Holiday/Haus

Source: LSA, May, 2008.

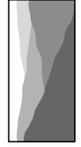


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 Environmental Planning and Research

Figure IV.M-4
 Approved Project Locations
 and Trip Assignment



Source: LSA, May, 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.M-5
Cumulative Baseline Typical Winter Saturday
Peak Hour Traffic Volumes

In addition, the Town is anticipating the installation of a roundabout (required mitigation of North Village) at Minaret Road/Forest Trail as an improvement.

The General Plan includes a mitigation of traffic signal installation at the Center Street/Main Street intersection. This mitigation is included in the Development Impact Fees (“DIFs”) program per the Town’s Capital Improvement Plan (“CIP”). The Town is planning the installation of a traffic signal at the USPO Driveway/Main Street intersection (currently planned to be installed next year [2009]). The planned signal at the Post Office would be removed with the Center Street/Main Street installation, and left turns onto Main Street from both directions would be prohibited.

**Table IV.M-4
Cumulative (2009) Typical Winter Saturday Intersection LOS**

Intersection	Control ⁽¹⁾	Delay (seconds)	LOS ⁽²⁾	With Improvement	
				Delay	LOS
Minaret Rd./Meridian Blvd.	Signal	31.6	C		
Minaret Rd./Lake Mary Road-Main St	Signal	30.0	C		
Minaret Rd./7B Rd.	TWSC	14.3	B		
Minaret Rd./Forest Trail ⁽³⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	5.3	A
Kelly Rd./Lake Mary Rd.	TWSC	11.8	B		
Lakeview Rd./Lake Mary Rd.	TWSC	11.4	B		
Canyon Blvd./Lake Mary Rd.	Signal	12.2	B		
Mountain Blvd./Main St. ⁽⁴⁾	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
USPO ⁽⁵⁾ Driveway/Main St.	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	30.5	D
Center St./Main St. ⁽⁶⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	22.1	C
Old Mammoth/Main St.	Signal	16.1	B		

Notes:

- (1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.
- (2) LOS = level of service
- (3) Roundabout implemented as an improvement since it is required by cumulative project.
- (4) Left turns onto Main Street from both directions will be prohibited as the improvement with installation of a traffic signal at Center/Main.
- (5) USPO = United States Post Office
- (6) Traffic signal planned to be installed per the Town’s Capital Improvement Plan (CIP).
- (7) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

Source: Traffic Impact Analysis prepared by LSA in May 2008.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the State *CEQA Guidelines*, a project would have a significant transportation/traffic impact if it would:

- (a) cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number or vehicle trips, the V/C ratio on roads, or congestion at intersections);
- (b) exceed, either individually or cumulatively, a LOS standard established by the Town (or Caltrans for State Route 203) for designated roads or highways;
- (c) result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- (d) substantially increase hazards to other motorists, cyclists or pedestrians due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- (e) result in inadequate emergency access;
- (f) result in inadequate parking capacity; or
- (g) conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks, pedestrian facilities).

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Threshold (c) listed above were determined to result in no impact. Therefore, only Thresholds (a), (b), (d), (e), (f) and (g) listed above are addressed in the following discussion.

The methodology utilized in this analysis for determining LOS for signalized and unsignalized intersections is described above under “Analysis Methods.”

Roadway operations and the relationship between capacity and traffic volumes are generally expressed in terms of LOS. These levels recognize that, while an absolute limit exists regarding the amount of traffic traveling through a given intersection (the absolute capacity), the conditions that motorists experience rapidly deteriorate as traffic approaches the absolute capacity. Under such conditions, congestion is experienced. There is general instability in the traffic flow, which means that relatively small incidents (e.g., momentary engine stalls) can cause considerable fluctuations in speeds and delays. This near-capacity situation is labeled LOS E. Beyond LOS E, capacity has been exceeded, and arriving traffic will

exceed the ability of the intersection to accommodate it. An upstream queue will then form and continue to expand in length until the demand volume again declines.

As mentioned previously, the Town's LOS standard for intersections is LOS D for signalized intersections. An intersection is considered satisfactory when it operates at LOS A–D. An unsignalized intersection would be considered deficient if an individual minor street movement operates at LOS E or F and total minor approach delay exceeds four vehicle hours for a single-lane approach and five vehicle hours for a multilane approach, consistent with the adopted Circulation Element and General Plan Update Draft EIR Traffic Analysis (2004).

Project Analysis Assumptions

Parking Facilities

The parking currently proposed by the Project is illustrated in Table IV.M-5. As previously discussed in Section III, Project Description, of this Draft EIR, Site 1 is designated as Resort General (RG) and Sites 2 and 3 are designated as Specialty Lodging (SL) under the Specific Plan. Both RG and SL land use designations require the majority of parking to be understructure. Although not required, the Project would provide 100 public parking spaces on Site 3 consistent with General Plan Mobility Policy M.6.B. A total of 100 parking spaces would be provided in excess of Town requirements.

**Table IV.M-5
Parking Requirements**

	Rooms⁽¹⁾	Required Parking⁽²⁾	Total Provided by the Project	Difference
Site 1				
Understructure Parking	198	238	238	
Check-in Spaces		3	3	
Site 1 Total		241	241	
Site 2				
Understructure Parking	364	327	327	
Check-in Spaces		3	3	
Site 2 Total		330	330	
Site 3				
Understructure Parking	180	146	146	
Check-in Spaces		3	3	
Public Parking		0	100	
Site 3 Total		149	249	+100
Total Parking		720	820	+100
<p><i>Notes:</i></p> <p>(1) Room combinations would vary upon approval of the Project's Final Development Plan. Room combinations are provided in Appendix I of this Draft EIR.</p> <p>(2) Resort condominium, multi-family and transient uses of more than 50 units which have a lobby or on-site management, common parking, and may have an accessory recreation amenity, meeting room(s), retail use or restaurant, which is oriented to the guests of the project, shall adhere to the following parking schedule:</p> <ul style="list-style-type: none"> • Studio/1 bedroom unit 1 space • 1 bedroom unit with lock off 1.75 spaces • 2 bedroom unit 1.5 spaces • 2 bedroom unit with lock of 2 spaces • 3+ bedroom unit 2 spaces • All projects shall provide a minimum of 3 check-in spaces. <p><i>Source: North Village Specific Plan, amended May 2008, Table 6: Parking Schedule for North Village, page 59.</i></p>				

Bicycle and Pedestrian Facilities

The Project would provide pedestrian access throughout the Project's three sites and subsequently provide pedestrian and bicycle connectivity within the Specific Plan area and link to the larger Town-wide existing and planned recreational trail network, which includes pedestrian trails, bike lanes and sidewalks that are adjacent to major roadways. Figures III-14 and III-15 in Section III, Project Description, of this Draft EIR illustrate the Project's pedestrian and bike path network, respectively.

Project Access

Primary access to the three corners of the Project site would be provided from the intersection of Lake Mary Road-Main Street/Minaret Road intersection and Canyon Boulevard. Project access points and overall vehicle movement are illustrated on Figure III-12, Vehicle Movements, and loading and vehicle movement is illustrated on Figure III-13, Loading and Service, in Section III, Project Description of this Draft EIR. Access, turn movements and service vehicle/loading areas for each site are as follows:

- Site 1 would be accessed from Canyon Boulevard to the west. This access point would provide for all turn movements into and out of the site. All Site 1 buildings would be serviced from internal driveways on Canyon Boulevard.
- Site 2 would be accessed from Lake Mary Road. This access would provide for all turn movements on Lake Mary Road. Two access points would be off of Minaret Road. The most southerly access point would provide for all turn movements while the northerly access would be restricted to right turns in and out only. This right-turn in/out driveway would be designed per Town Standard Plan No. 114, Figure B, to provide a channelizing island to prevent left-turn egress and ingress maneuvers and appropriate signage noting restricted left-turn egress. All Site 2 buildings would be serviced from internal driveways on Minaret Road.
- Site 3 would be accessed from Minaret Road to the new paved public road (referred to as the 7B Road). As stated previously, the new road is part of a previous project approval and not proposed as part of this Project. This access point would provide for all turn movements into and out of the site. All Site 3 buildings would be serviced from internal driveways from the proposed new road.

Service areas for each of the Project's three sites do not necessarily require access to structured parking garages that may otherwise discourage their use. On-street parking is proposed on Lake Mary Road to serve the ground-level retail uses on both sides of the street to the west of the Lake Mary Road-Main Street/Minaret Road intersection.

The Project would commit the following transit enhancements to and from the site.

1. An exclusive shuttle service provided for hotel guests to local areas of attraction, ski lifts, a gondola, and the airport.

As described above under the heading "Project Analysis Methods", Project trips were generated based on the land uses of the Project. Trip distribution and assignment were determined by the relationship of prominent attractions to the Project. Winter Saturday daily and peak-hour trips were generated for the proposed Project using trip rates from the *ITE Trip Generation Manual, 7th Edition* (2003), observed rates from the North Village Lodges (i.e., Grand Sierra, White Mountain, and Lincoln House) parking garage, and confirmed by the counts taken for the Westin Hotel project. The existing trip count data is provided in Appendix A of the Traffic Impact Analysis provided in Appendix I of this Draft EIR.

As shown in Table IV.M-6, the proposed Project would generate approximately 2,604 daily trips and 235 peak-hour trips. In light of the unique trip generation applied to the Project's proposed hotel units, a monitoring program would need to be implemented on an annual (typical winter Saturday) basis to document effective hotel unit trip generation. If actual Project hotel unit trip generation is significantly higher than documented in the Traffic Impact Analysis, the Project may be required to provide additional buses/shuttles and/or a bus stop on the easterly side of Minaret Road at the new paved public road (referred to as 7B Road) for a future transit route.

**Table IV.M-6
Project Trip Generation**

Land Use	Size	Units	Saturday Peak Hour			
			ADT	In	Out	Total
Trip Rate						
Resort Hotel ⁽¹⁾		DU	3.185	0.151	0.129	0.280
Condominium/Townhouse ⁽²⁾		DU	5.670	0.254	0.216	0.470
Quality Restaurant ⁽³⁾		TSF	94.360	6.384	4.436	10.820
High-Turnover (sit-down) Restaurant ⁽⁴⁾		TSF	158.370	12.600	7.400	20.000
Retail ⁽⁵⁾		TSF	49.970	2.381	2.381	4.762
Market ⁽⁶⁾		TSF	177.590	5.488	5.272	10.760
Office ⁽⁷⁾		TSF	2.370	0.221	0.189	0.410
Site 1 (Northwest Corner of Minaret Road/Lake Mary Road)						
Existing Trip Generation						
Whiskey Creek Restaurant ⁽⁸⁾	10.070	TSF	713	48	34	82
Old Inyo Mono Title Building ⁽⁹⁾	5.100	TSF	6	1	0	1
Total Existing Trip Generation			719	49	34	83
Project Trip Generation						
Resort Hotel	170	DU	541	26	22	48
Hotel/Visitor Amenities ⁽¹⁰⁾	14.390	TSF	-	-	-	-
Total Site 1 Residential Trip Generation			541	26	22	48
Quality Restaurant	2.750	TSF	259	18	12	30
High-Turnover Restaurant	2.750	TSF	436	35	20	55
Retail	16.500	TSF	825	39	39	79
Total Site 1 Commercial Trip Generation			1,520	91	72	163
Internal Capture (50%) ⁽¹¹⁾			(760)	(46)	(36)	(82)
Net Site 1 Commercial Trip Generation			760	46	36	82
Net Site 1 Trip Generation (Residential + Commercial)			1,301	71	58	129
Total Site 1 Trip Generation (Proposed – Existing)			583	23	24	47
Site 2 (Southwest corner of Minaret Road/Lake Mary Road)						
Existing Trip Generation						
North Village Inn ⁽⁹⁾	17.000	DU	48	2	2	4
63 Lake Mary Road	1.000	DU	6	0	0	0
The White Church	-	DU	-	-	-	-
Total Existing Trip Generation			54	2	2	4
Project Trip Generation						
Resort Hotel	193	DU	615	29	25	54
Hotel/Visitor Amenities ⁽¹⁰⁾	24.640	TSF	-	-	-	-
Condominiums (Employee Housing)	41	DU	232	10	9	19
Total Site 2 Residential Trip Generation			847	40	34	73
Quality Restaurant	2.313	TSF	218	15	10	25
High-Turnover Restaurant	2.313	TSF	366	29	17	46
Retail	10.875	TSF	543	26	26	52
Market	3.000	TSF	533	16	16	32
Total Site 2 Commercial Trip Generation			1,661	86	69	155
Internal Capture (50%) ⁽¹¹⁾			(830)	(43)	(35)	(78)
Pass-By Trip Reduction for Market (36%) ⁽¹²⁾			(96)	(3)	(3)	(6)
Net Site 2 Commercial Trip Generation			734	40	32	72
Net Site 2 Trip Generation (Residential + Commercial)			1,582	80	65	145
Total Site 2 Trip Generation (Proposed – Existing)			1,528	77	63	141

**Table IV.M-6
Project Trip Generation**

Site 3 (Southeast Corner of Minaret Road/Lake Mary Road)						
Existing Trip Generation						
White Stag Inn ⁽¹³⁾	21.000	DU	-	-	-	-
Ullr Lodge ⁽¹³⁾	19.000	DU	-	-	-	-
Total Existing Trip Generation			0	0	0	0
Project Trip Generation						
Resort Hotel	105	DU	334	16	14	29
Hotel/Visitor Amenities ⁽¹⁰⁾	46.040	TSF	-	-	-	-
Condominiums (Employee Housing)	27	DU	153	7	6	13
Total Site 3 Residential Trip Generation			488	23	19	42
Total Site 3 Trip Generation (Proposed – Existing)			488	23	19	42
Mammoth Crossing Transit Shuttle ⁽¹⁴⁾			6	3	3	6
Red Line Bus Route ⁽¹⁵⁾			-	-	-	-
Net Transit Trip Generation			6	3	3	6
Total Net Project Trip Generation (Site 1 + Site 2 + Site 3) – Existing Uses			2,604	126	110	235
<i>Notes:</i>						
<i>ADT = Average Daily Traffic</i>						
<i>DU = Dwelling Unit</i>						
<i>TSF = Thousand Square Feet</i>						
(1) Peak hour trip rate referenced from observed vehicular count data (inbound and outbound) at the Intrawest North Village Lodges (i.e., Grand Sierra, White Mountain, and Lincoln House) parking garage (February 9, 2008).						
(2) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (230) – Residential Condominium/Townhouse.						
(3) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (931) – Quality Restaurant.						
(4) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (932) – High-Turnover (sit-down) Restaurant.						
(5) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (814) – Specialty Retail.						
(6) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (850) – Supermarket.						
(7) Trip rate referenced from the ITE, Trip Generation Manual, 7th Edition (2003) Land Use Code (710) – General Office Building.						
(8) Based on the proximity of Whiskey Creek to the Village and other attractions, the existing trip generation for this land use has been reduced by 25 percent to account for pedestrian trips.						
(9) Existing use is observed to be 50 percent occupied. As such the trip generation has been reduced by 50 percent.						
(10) Hotel/Visitor Amenities consist of offices, meeting space and common areas associated with lodging uses. Trip generation is included in the Resort Hotel rate.						
(11) It is expected that approximately 50 percent of the restaurant and commercial retail are generated by a combination of persons within walking distance. It should also be noted that this includes pedestrians from surrounding developments in the North Village less than 1,000 feet away (Westin Hotel, Ritz Carlton, Hillside, Grand Sierra, White Mountain, Lincoln House and One Hotel).						
(12) Pass-by trip reduction based on an average pass-by percentage per Table 5.10 of the ITE Trip Generation Handbook, 2 nd Edition (2004) Land Use Code (850) – Supermarket. Pass-by trips are assigned to on-street parking only on Lake Mary Road.						
(13) Existing uses currently not occupied. As such no trips are generated for these existing uses.						
(14) Mammoth Crossing shuttle service is estimated to serve the Project site three times during the Saturday peak hour.						
(15) The Red Line bus route is expected to serve within the proximity of the Project on Minaret Road and Lake Mary Road-Main Street every half hour from 5:00 p.m.-12:00 a.m. As such, no Red Line bus trips into and out of the Project site are expected.						
<i>Subtotals may not appear to add correctly due to rounding.</i>						
<i>Source: Traffic Impact Analysis prepared by LSA in May 2008.</i>						

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes’ General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces, and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

Project Impacts and Mitigation Measures

Impact TRANS-1 Existing Plus Project Intersection LOS

The trip distribution and Project trips at study area intersections are illustrated in Figure IV.M-6. Existing plus Project traffic volumes are shown in Figure IV.M-7. LOS at study area intersections are shown in Table IV.M-7.

**Table IV.M-7
Existing Plus Project Typical Winter Saturday Intersection LOS**

Intersection	Control ⁽¹⁾	Delay (seconds)	LOS ⁽²⁾	With Improvement	
				Delay	LOS
Minaret Rd./Meridian Blvd.	Signal	28.6	C		
Minaret Rd./Lake Mary Road-Main St	Signal	27.5	C		
Minaret Rd./7B Rd.	TWSC	17.3	C		
Minaret Rd./Forest Trail ⁽³⁾	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
Kelly Rd./Lake Mary Rd.	TWSC	11.5	B		
Lakeview Rd./Lake Mary Rd.	TWSC	10.6	B		
Canyon Blvd./Lake Mary Rd.	Signal	13.8	B		
Mountain Blvd./Main St.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
USPO ⁽⁴⁾ Driveway/Main St. ⁽³⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	22.3	C
Center St./Main St.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	E		
Old Mammoth/Main St.	Signal	14.8	B		

Notes:

- (1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.
- (2) LOS – level of significance
- (3) Traffic signal planned to be installed per the Town’s Capital Improvement Plan (CIP).
- (4) USPO = United States Post Office
- (5) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

Source: Traffic Impact Analysis prepared by LSA in May 2008.

As shown in Table IV.M-7, all study area intersections are forecast to operate within or below the Town’s threshold of significance in the existing plus Project condition with the exception of USPO Driveway/Main Street.

Although the intersection of USPO Driveway/Main Street is deficient in the existing condition and would continue to operate at an unacceptable LOS with the addition of the Project to existing conditions, the Town is proceeding with plans to install a traffic signal at this location per the Town’s Capital Improvement Program (“CIP”). Therefore the impact would be **less than significant** and no mitigation measures are required.

Impact TRANS-2 Cumulative Plus Project Intersection LOS

The trip distribution and Project trips at study area intersections, previously referenced in Figure IV.M-6, were added to the cumulative baseline condition. Cumulative plus Project traffic volumes are shown in Figure IV.M-8. Cumulative plus Project LOS at study area intersections was analyzed and is shown in Table IV.M-8.

As shown in Table IV.M-8, all of the study area intersections are forecast with improvements to operate within or below the Town's threshold of significance in the cumulative plus Project condition with the exception of Center Street/Main Street. This location is also deficient in the without Project condition.

Mitigation Measure TRANS-2 Cumulative Plus Project Intersection LOS

Evaluation of intersection LOS shows that the addition of the Project traffic to the cumulative traffic would contribute to the cumulative deficiency and therefore significantly impact the Center Street/Main Street intersection in the cumulative plus Project scenario, according to the Town's criteria.

The following mitigation would be required for the cumulative plus Project condition to mitigate the intersection to LOS D or better:

- a. **Center Street/Main Street.** Payment of Development Impact Fees ("DIFs"), a portion of which is applicable to installation of a traffic signal at Center Street/Main Street intersection is consistent with the Town's General Plan recommended mitigation measures. When the Center Street/Main Street traffic signal is installed, the planned signal at the Post Office would be removed, and left turns onto Main Street from both directions would be prohibited. Traffic requiring this movement has been reassigned to the Center Street/Main Street intersection. All costs for the implementation of this improvement should be eligible for a credit to DIFs. This mitigation would be implemented as part of a traffic mitigation program that would be funded by the DIFs.
- b. In light of the unique trip generation applied to the hotel units, referenced from observed vehicular count data (inbound and outbound) at the Intrawest North Village Lodges (i.e., Grand Sierra, White Mountain, and Lincoln House) parking garage on February 9, 2008, it is recommended that a monitoring program be implemented on an annual (typical winter Saturday) basis to document effective hotel unit trip generation.

If hotel unit trip generation is significantly higher than documented in the traffic impact analysis, the Project may be required to provide additional buses/shuttles and/or a bus stop on the easterly side of Minaret Road at the new road also known as the 7B Road (for a future transit route).

Implementation of this mitigation measure would reduce this impact to a *less-than-significant* level.

**Table IV.M-8
Cumulative Plus Project Typical Winter Saturday Intersection LOS**

Intersection	Control ⁽¹⁾	Delay (seconds)	LOS ⁽²⁾	With Improvement	
				Delay	LOS
Minaret Rd./Meridian Blvd.	Signal	32.0	C		
Minaret Rd./Lake Mary Road-Main St	Signal	31.6	C		
Minaret Rd./7B Rd.	TWSC	29.9	D		
Minaret Rd./Forest Trail ⁽³⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	5.5	A
Kelly Rd./Lake Mary Rd.	TWSC	12.0	B		
Lakeview Rd./Lake Mary Rd.	TWSC	11.5	B		
Canyon Blvd./Lake Mary Rd.	Signal	13.9	B		
Mountain Blvd./Main St.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
USPO ⁽⁴⁾ Driveway/Main St. ⁽⁵⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	34.7	D
Center St./Main St. ⁽⁶⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	26.9	C
Old Mammoth/Main St.	Signal	17.2	B		

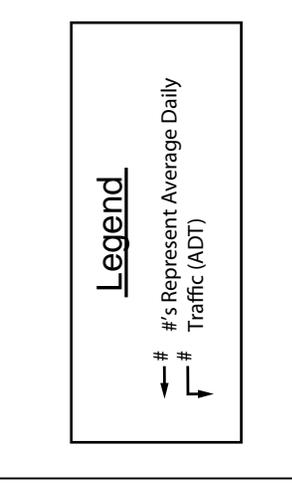
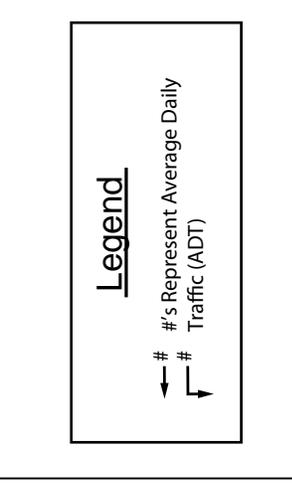
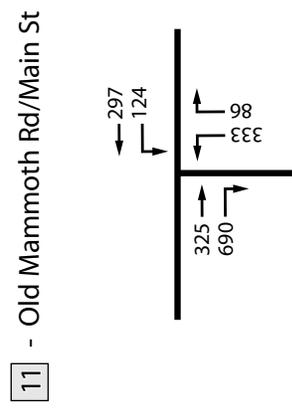
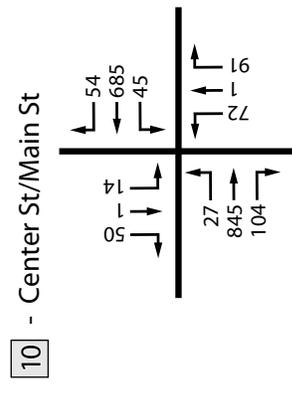
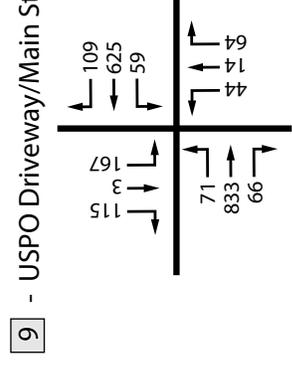
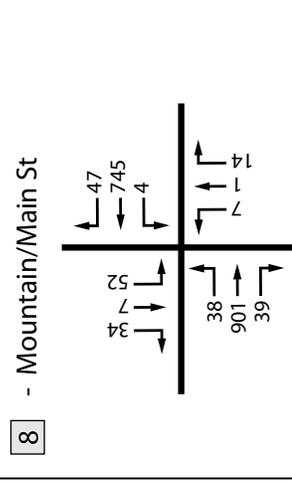
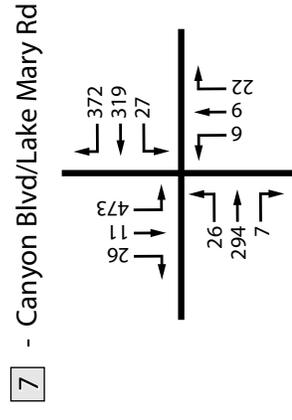
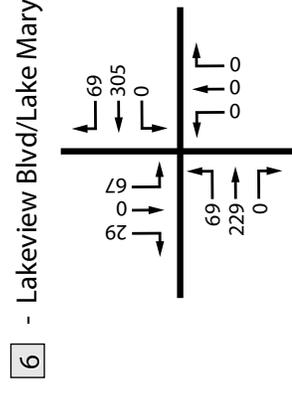
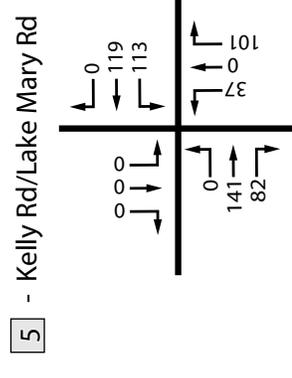
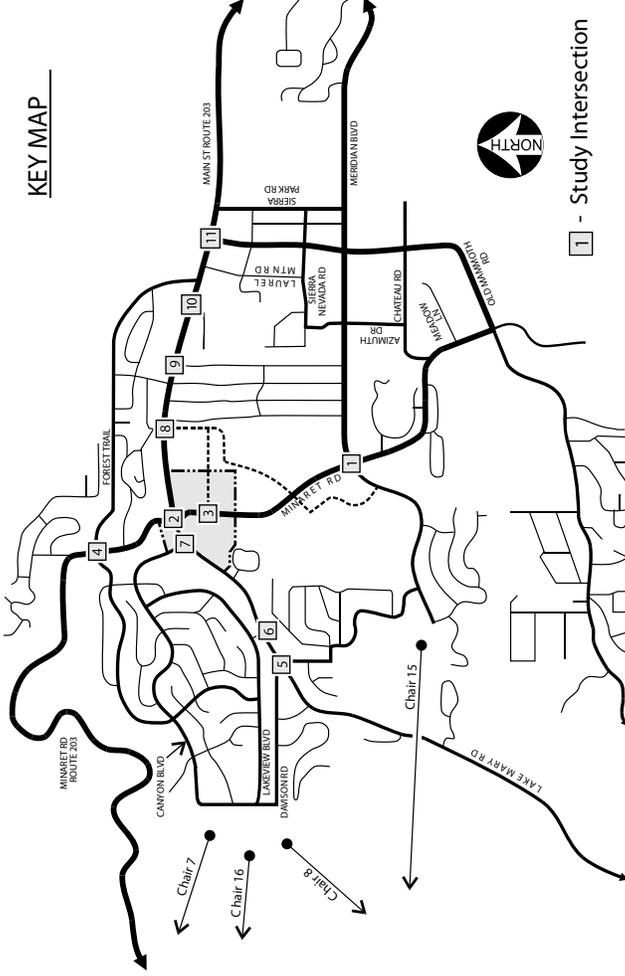
Notes:

- (1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.
- (2) LOS = level of service
- (3) Roundabout implemented as an improvement since it is required by cumulative project.
- (4) USPO = United States Post Office
- (5) Left turns onto Main Street from both directions will be prohibited as the improvement with installation of a traffic signal at Center/Main.
- (6) Traffic signal planned to be installed per the Town's Development Impact Fees (DIF) program.
- (7) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

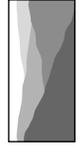
Source: Traffic Impact Analysis prepared by LSA in May 2008.

Impact TRANS-3 Internal Circulation and Access

The existing major public roads that serve the Project site are Minaret Road, Old Mammoth Road, and Lake Mary-Main Street. Primary access to the Project site would be provided from the Minaret Road/Lake Mary-Main Street intersection. The operation of the ingress and egress locations of the Project site along Canyon Boulevard, Lake Mary Road, and Minaret Road has been evaluated. Four access driveways (Driveway A on Canyon Boulevard north of Lake Mary, Driveway B on Lake Mary Road/Canyon Boulevard, Driveway C on Minaret Road south of Lake Mary, and Driveway D on Minaret south of Driveway C) would be provided at the Project site. Figure IV.M-9 illustrates these access locations with Project trip assignment.

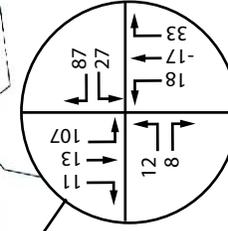
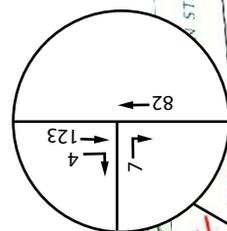
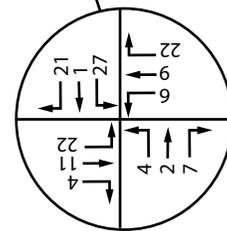
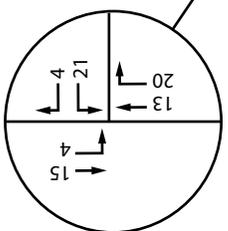


Source: LSA, May, 2008.



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Environmental Planning and Research

Figure IV.M-8
Cumulative Plus Project Typical Winter Saturday
Peak Hour Traffic Volumes



Legend

- A - Project Driveway
- + - Project Trip Assignment
- \leftarrow \rightarrow #s Represent Average Daily Traffic (ADT)

Source: LSA, May, 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



Figure IV.M-9
Project Trip Assignment at Access Locations

A 2000 HCM analysis was prepared for the four access driveways in the cumulative plus Project scenario, as illustrated in Table IV.M-9. Project trips were distributed based on the regional distribution patterns discussed previously and were assigned to each driveway based on logical travel corridors and minimum time paths.

**Table IV.M-9
Cumulative Plus Project Typical Winter Saturday Intersection LOS
at Study Area Access Locations**

Intersection	Cumulative Plus Project	
	Delay (seconds)	LOS ⁽¹⁾
Driveway A	21.3	C
Driveway B	13.9	B
Driveway C	13.8	B
Driveway D	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F
<i>Note:</i> (1) LOS = level of service Source: Traffic Impact Analysis prepared by LSA in May 2008.		

As shown in Table IV.M-9, all study area access driveways are forecast to operate within or below the Town's threshold of significance in the cumulative plus Project scenario. Although Driveway D (Minaret Road/7B Road) is forecast to operate at LOS F, this intersection does not exceed the four vehicle-hour criteria and, therefore, impacts to internal circulation and access would be *less than significant* and no mitigation measures are required.

Impact TRANS-4 Parking

The Project would provide understructure parking facilities for the majority of the development. Parking structures would be designed to provide adequate width and height to accommodate most private vehicles. Short-term surface parking would be provided adjacent to the check-in locations; guests would be directed to understructure parking structures located beneath the hotel buildings for parking during the duration of their stay. Additional proposed short-term parking includes passenger drop off and loading spaces within each site, on-street and understructure spaces to serve proposed retail uses, and spaces for service and delivery vehicles. Emergency vehicle parking would be provided internally at an accessible location within each site. Connections would be provided from surface parking lots to internal walkways and pedestrian circulation areas (such as plazas and pedestrian, bicycle and trail facilities).

The Project will be required to provide adequate parking in proportion with and sufficient to accommodate the potential demand created by each use of the Project consistent with Policy 12 of the Transportation and Circulation Element of the Specific Plan as part of the approval process. As illustrated in Table IV.M-5, the Project would provide parking pursuant to requirements of the Specific Plan. Site 1 is designated as Resort General (RG) and Sites 2 and 3 are designated as Specialty Lodging (SL) under the Specific Plan. Both RG and SL land use designations require the majority of parking to be understructure and a minimum of three check-in spaces is required for each hotel. As identified above in

Table IV.M-5, with the inclusion of Project parking the Project would provide an additional 100 parking spaces over what is required. The provision of public parking on Site 3 is consistent with General Plan Mobility Policy M.6.B. Therefore the Project would not result in inadequate parking capacity and impacts would be *less than significant* and no mitigation measures are required.

Impact TRANS-5 Bicycle and Pedestrian Facilities

The Town Trail System Master Plan proposes the extension of facilities to promote such non-motorized alternative forms of transportation as walking, bicycling and cross-country skiing. In addition, the Project would be required to provide pedestrian and bicycle use connectivity within the North Village Specific Plan area. In Section III, Project Description, of this Draft EIR, Figures III-14 and Figure III-15 illustrate the pedestrian and bike path network of the Project area. The Project's placement of sidewalks, paths, and public plazas would connect the hotels and residents with the Town-core, as well as with the North Village. The sidewalks and paths would connect internally and with existing or planned Town paths and sidewalks. Bicycle lanes and the points of access to existing or proposed bicycle paths are represented on Figure III-15. Crosswalks would be provided at the new public paved road (referred to as 7B Road) on Site 3 to provide safe connection between Site 1 and Site 3. For safety, bicycle riding would be prohibited throughout the interior of the Project site. However, bicycles can be walked throughout the Project site and bicycle parking facilities would be provided within the Project site. Bicycle traffic will be able to utilize the typical pedestrian crossings at the signalized intersections.

All Project bicycle and pedestrian facilities would ultimately connect with the Town's trail system, thereby providing the Project with a connection to Town-wide facilities. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed internal access and pedestrian and bicycle facility system would be reviewed by the Town to ensure that a safe movement of people is maintained. Therefore, impacts would be *less than significant* and no mitigation measures are required.

Impact TRANS-6 Transit

Shuttle services operated by the Town of Mammoth Lakes and by Mammoth Mountain Ski Area provide year-round day and nighttime service to the North Village. All lines provide transfers to other lines at the North Village. The Project would not only use the existing bus/shuttle shelters located at the North Village, but also proposes additional transit stops on Lake Mary Road just west of Minaret Road. In addition, all three Project hotels would provide their guests with exclusive shuttle service to local areas of attraction in Town, ski lifts, a gondola and the Mammoth Yosemite Airport. It is not anticipated that any increases in transit use would result in demand for the Mammoth Lakes or the Mammoth Mountain Ski Area that cannot be accommodated. Therefore, impacts to transit would be *less than significant* and no mitigation measures are required.

Impact TRANS-7 Hazards

The existing roadways that serve the Project site are Main Street, Lake Mary Road, Minaret Road and Canyon Boulevard. The Project proposes various improvements to these roadways. Two lanes in each direction would be maintained on Lake Mary Road and a center median to provide left-turn stacking in the eastbound direction would also be provided. Traffic signals at the intersections with Minaret Road and Canyon Road are proposed to remain. A fourth leg will be added to the Canyon Boulevard/Lake Mary intersection to serve as an access to the Project site. Also, a new paved public road (referred to as 7B Road) would be constructed off of Minaret Road at the southern end of the site and adjacent to the Sierra Star Golf Course. The Project would provide internal driveways, parking areas, service vehicle loading areas and emergency vehicle staging space. Roadway designs and vehicle access points would fit the land and allow for views of oncoming traffic. Safe crossings for pedestrians and bicycles would be provided at roadway intersections and at Project site vehicle access points that also support sidewalks. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed internal access and pedestrian and bicycle facility system would be reviewed by the Town to ensure that a safe movement of people is maintained.

Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials so as to be adequate for emergency and fire equipment vehicles. No agricultural land uses are located in proximity to the Project site. Therefore, the Project would not result in traffic hazards associated with incompatible uses, such as farm equipment. The Project would not substantially increase hazards due to a design feature or incompatible uses and impacts would be ***less than significant*** and no mitigation measures are required.

Impact TRANS-8 Emergency Access

Emergency vehicle access would be provided from the same primary access points as for vehicles, as illustrated in Section III, Project Description, of this EIR in Figure III-12. Emergency vehicle parking would be provided internally at an accessible location within each site. The Project would provide emergency vehicle staging areas and standpipe systems³ as illustrated in Figure III-16. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in locations accessible to fire equipment.

Supplemental fire lanes would be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii and back up space around buildings would be designed in cooperation with local officials to ensure adequacy for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle traffic.

³ *A standpipe system is an arrangement of piping, valves, hose connections and allied equipment installed in a building or structure with the hose connections located in such a manner that water can be discharged in streams or spray patterns through attached hose and nozzles.*

Therefore the Project would not result in inadequate emergency access and impacts would be *less than significant* and no mitigation measures are required.

Impact TRANS-9 Policy Consistency

The *Town of Mammoth Lakes' General Plan* and the *North Village Specific Plan* define policies to improve and develop an integrated multi-modal transportation system, one that serves the various needs of residents, employees and visitors. Applicable “mobility” policies and a brief discussion on how the Project is consistent with these policies are listed in Section IV.I, Land Use and Planning, of this Draft EIR, in Table IV.I-2 and Table IV.I-3.

The Mono County Local Transportation Commission (“MCLTC”) is the designated Regional Transportation Planning Agency for Mono County. The goal of the *Mono County Regional Transportation Plan* (“Transportation Plan”) is to provide and maintain a transportation system which provides for the safe, efficient and environmentally sound movement of people, goods and services, and which is consistent with the socioeconomic and land use needs of Mono County.⁴ The Transportation Plan includes the existing highway and road system, as well as the bikeway/trail component and air travel. The MCLTC does not currently have any adopted policies.

The Project would provide short-term surface parking adjacent to the check-in locations, and guests would be directed to understructure parking structures located beneath the hotel buildings for parking during the duration of their stay. The Project would provide for pedestrian and bicycle facilities and a shuttle service for hotel guests, facilitating the safety, use and comfort of passengers using transit within the Project area. As discussed in Table IV.I-2 and Table IV-3, the Project would be consistent with all applicable mobility policies outlined in the 2007 General Plan and the May 2008 Specific Plan. Therefore the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation and impacts would be *less than significant* and no mitigation measures are required.

Impact TRANS-10 Construction

During construction, more vehicle trips are expected to be generated during the grading and excavation phase than during other portions of Project construction activity. Because grading would not be balanced on site, grading operations would involve haulers conducting load trips per day (trips in and trips out). The proposed Project would require approximately 156,430 cubic yards of grading of which approximately 7,350 cubic yards would be excavation/embankment and approximately 149,080 cubic yards would be excavation/expansion which would be cut and hauled to an off-site location (most likely the United States Forest Service pit located at the Mammoth Airport approximately nine miles away from the Project location.) Based on a grading operation projection of 1,600 cubic yards (CY) per day, a

⁴ *Mono County Local Transportation Commission, Transportations Issues, website: http://www.monocounty.ca.gov/cdd%20site/LTC/lc_home.html, January 22, 2008.*

maximum of 160 trucks (10 CY per truck) over an eight-hour day (20 loads/hour) is anticipated. Using this projection, the 149,080 CY of excavation would last approximately 93 days (149,080 CY/1,600 CY per day). The return empty trip would equate to a total of 320 average daily trips (ADT), assuming 160 truck trips in, and 160 truck trips out. Based on the ADT of 320 and the roundtrip distance to the off-site hauling location of 18 miles, the projected VMT for construction-related truck traffic would be 5,760 (320 ADT x 18 miles). The 5,760 VMT for construction traffic is still less than the 6,450 VMT associated with full occupancy of the proposed Project. As such, no further impacts are anticipated due to the excavation/hauling operation. These trips would occur on no-snow conditions weekdays, Monday through Friday. The grading operation of trips generated during the weekday peak hour would have no impact on the traffic impact analysis's typical winter Saturday.

All other construction staging is to occur within the Project boundaries. Other construction phases (e.g., hauling of equipment and materials, removal or demolition of existing buildings) would generate comparatively fewer trips; thus, impacts associated with grading phase traffic would be considered the worst-case situation during Project construction.

In addition, permits will be required for the relocation and/or demolition of existing buildings, and the Project is subject to conditions of the grading permit. Therefore, the Project's construction impacts would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact TRANS-11 Cumulative Impacts

The long-range Town General Plan buildout scenario from the *Mammoth Crossings Traffic Impact Analysis* (LSC Consultants, Inc., March 2008) was used to evaluate long-range traffic impacts of the approved Project. Study area intersection LOS and mitigated LOS for long-range conditions are summarized in Table IV.M-10. Figure IV.M-10 illustrates General Plan long-range traffic volumes. Study area intersection LOS and mitigated LOS for long-range conditions plus Project are summarized in Table IV.M-11. Figure IV.M-11 illustrates General Plan plus Project long-range traffic volumes. The approved Project, which would include the development of 432 traffic-generating units (742 resort/hotel rooms and 66 affordable housing rooms) and 40,500 square feet of commercial uses on the three corners of Minaret Road/Lake Mary Road, can be mitigated with the measure identified previously. Therefore, LOS conditions will be improved from those reported in the General Plan analysis and the approved Project would not contribute to a significant adverse cumulative impact.

**Table IV.M-10
General Plan Typical Winter Saturday Intersection LOS (with Adopted Mitigations)**

Intersection	Control ⁽¹⁾	Delay (seconds)	LOS ⁽²⁾	With Mitigation ⁽³⁾	
				Delay	LOS
Minaret Rd./Meridian Blvd.	Signal	50.9	D		
Minaret Rd./Lake Mary Road-Main St	Signal	41.6	D		
Minaret Rd./7B Rd.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
Minaret Rd./Forest Trail ⁽⁴⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	21.4	C
Kelly Rd./Lake Mary Rd.	TWSC	33.2	D		
Lakeview Rd./Lake Mary Rd. ⁽⁵⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	31.5	D
Canyon Blvd./Lake Mary Rd.	Signal	14.3	B		
Mountain Blvd./Main St. ⁽⁶⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	13.4	B
USPO ⁽⁷⁾ Driveway/Main St. ⁽⁸⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	15.6	B
Center St./Main St. ⁽⁹⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	17.8	B
Old Mammoth/Main St.	Signal	16.3	B		

Notes:

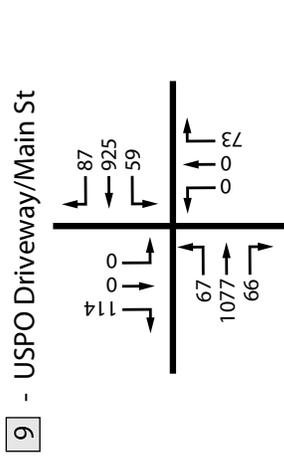
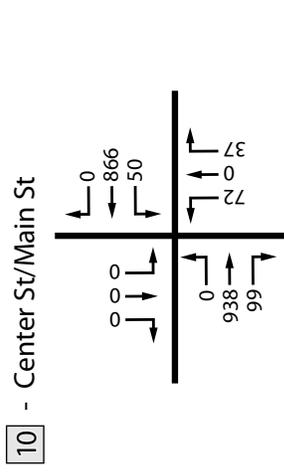
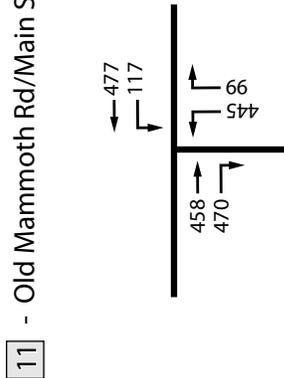
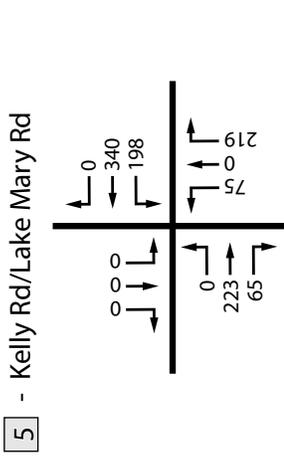
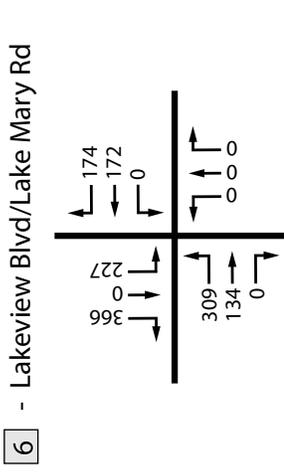
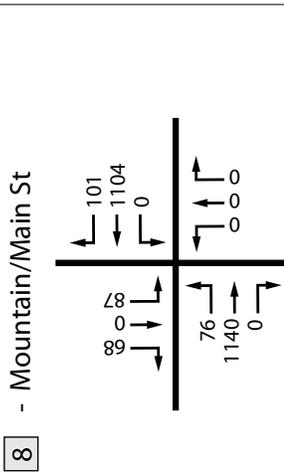
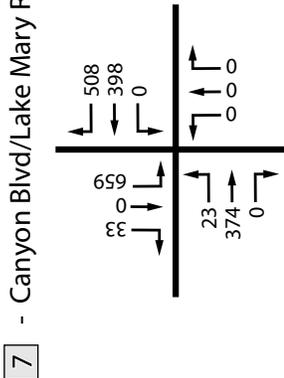
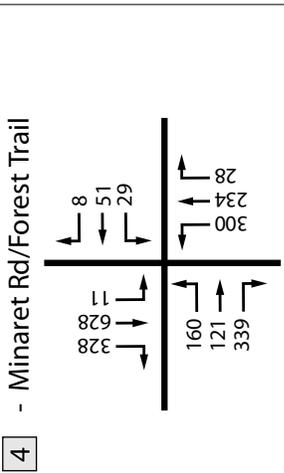
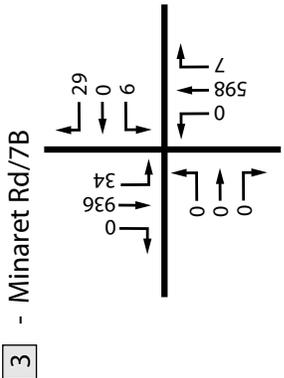
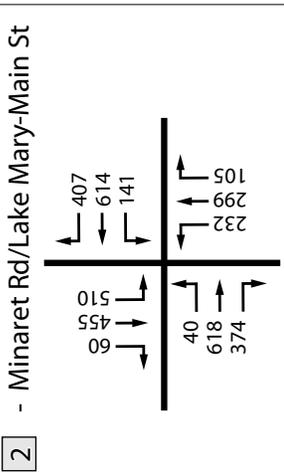
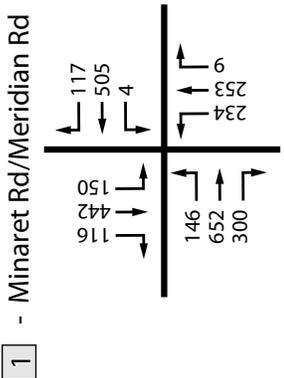
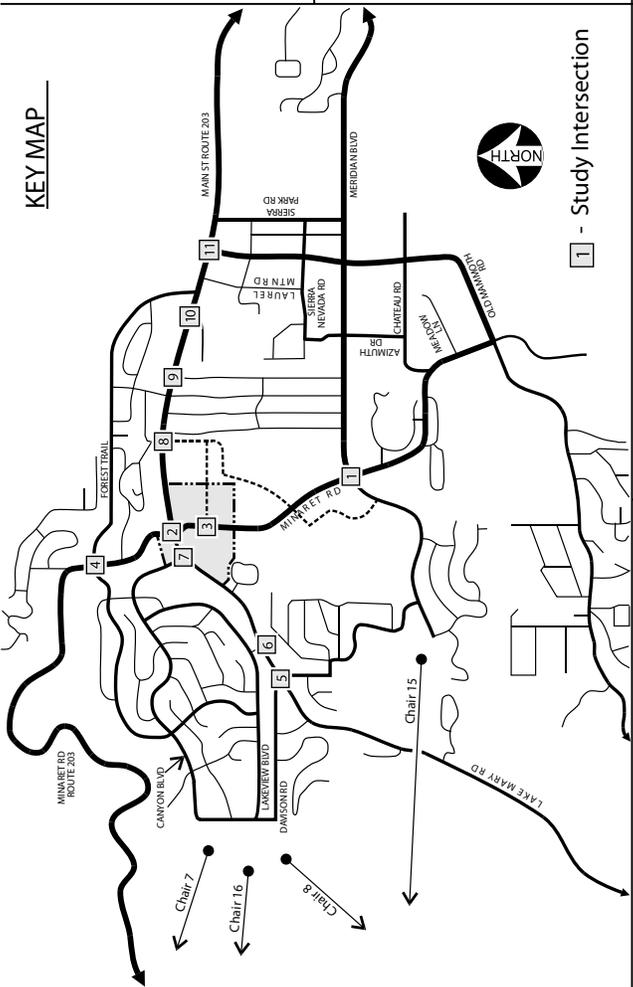
- (1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.
- (2) LOS = level of service
- (3) Mitigation measures are prescribed by the General Plan.
- (4) Roundabout implemented consistent with General Plan mitigation.
- (5) Provisions of separate southbound left- and right-turn lanes and an eastbound acceleration lane along Lake Mary Road (to accommodate two-stage left turns from Lakeview to Lake Mary) consistent with General Plan mitigation.
- (6) Traffic signal to be installed consistent with General Plan mitigation.
- (7) USPO = United States Post Office
- (8) Left turns onto Main Street from both directions will be prohibited with installation of a traffic signal at Center/Main. Left turns prohibited would be diverted to the intersection at Center Street.
- (9) Traffic signal to be installed with General Plan mitigation.
- (10) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

Source: Traffic Impact Analysis prepared by LSA in May 2008.

As shown in Table IV.M-10, all study intersections would continue to operate within or below the Town's threshold of significance under long-range conditions with General Plan mitigation provisions.

It should be noted that the mitigation measures prescribed by the General Plan (as reported in Table IV.M-9) are implemented in the General Plan plus Project scenario.

KEY MAP



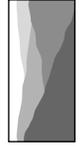
Legend

#s Represent Average Daily Traffic (ADT)

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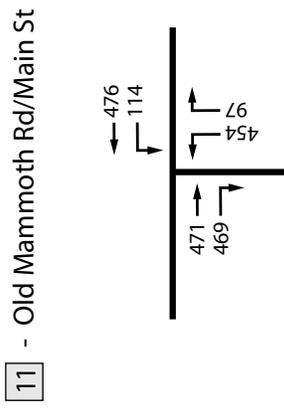
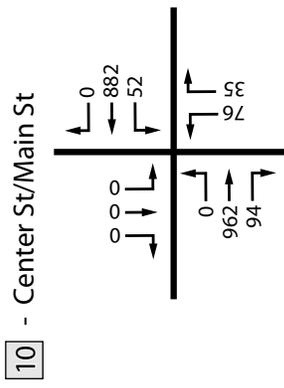
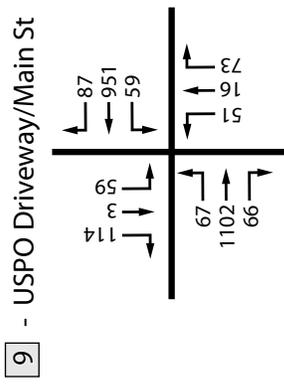
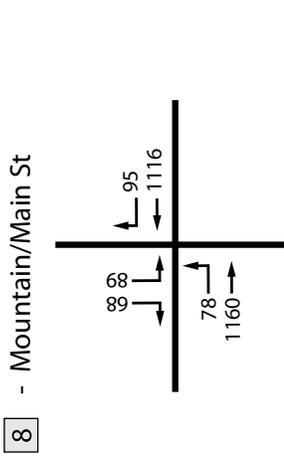
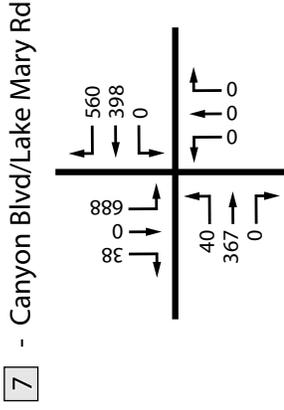
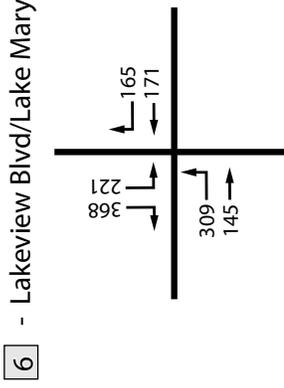
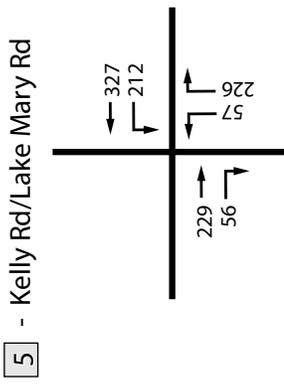
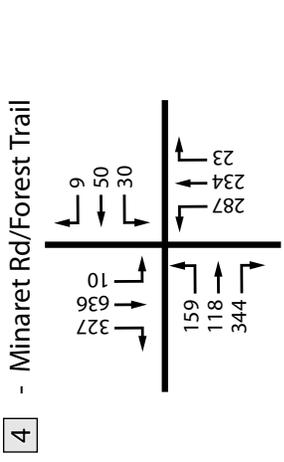
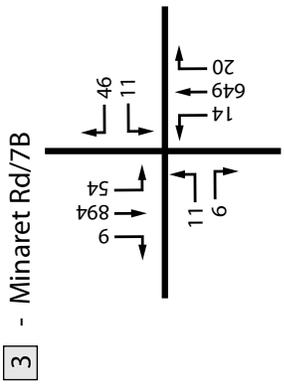
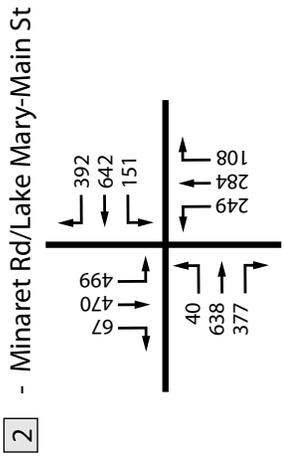
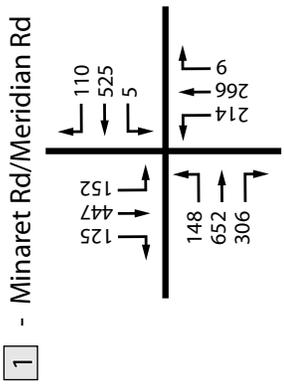
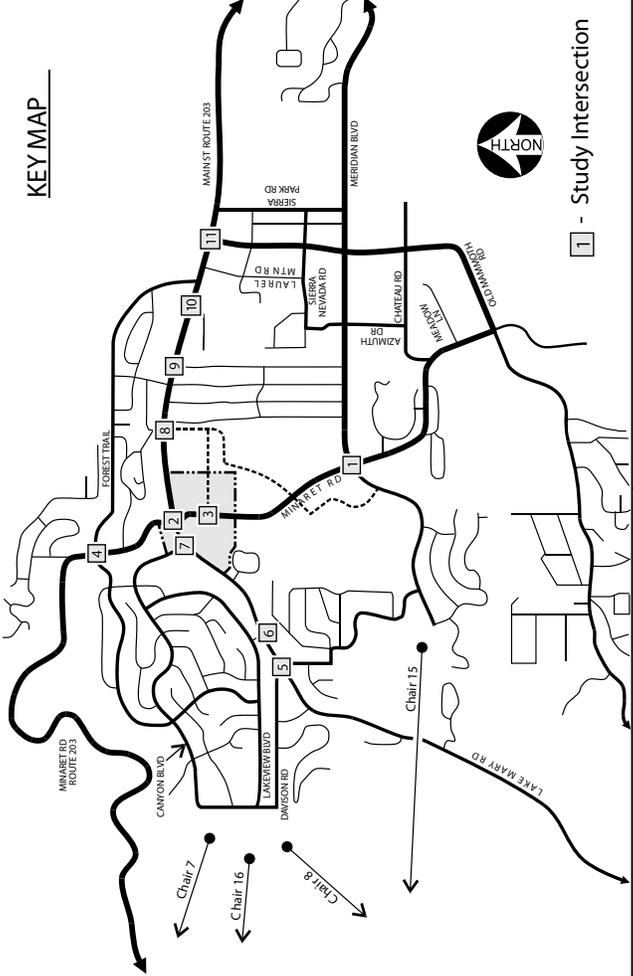
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Source: LSA, May, 2008.

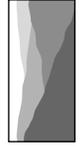


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Figure IV.M-10
Adopted General Plan Typical Winter Saturday
Peak Hour Traffic Volumes



Source: LSA, May, 2008.



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Figure IV.M-11
Adopted General Plan Plus Project Typical Winter Saturday Peak Hour Traffic Volumes

**Table IV.M-11
General Plan Plus Project Typical Winter Saturday Intersection LOS (with Adopted Mitigations)**

Intersection	Control ⁽¹⁾	Delay (seconds)	LOS ⁽²⁾	With Mitigation ⁽³⁾	
				Delay	LOS
1. Minaret Rd./Meridian Blvd.	Signal	50.8	D		
2. Minaret Rd./Lake Mary Road-Main St	Signal	44.5	D		
3. Minaret Rd./7B Rd.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	F		
4. Minaret Rd./Forest Trail ⁽⁴⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	26.8	D
5. Kelly Rd./Lake Mary Rd.	TWSC	>35.0 seconds but <4.0 hour cumulative delay on minor street approach	E		
6. Lakeview Rd./Lake Mary Rd. ⁽⁵⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	30.2	D
7. Canyon Blvd./Lake Mary Rd.	Signal	15.1	B		
8. Mountain Blvd./Main St. ⁽⁶⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	13.5	B
9. USPO ⁽⁷⁾ Driveway/Main St. ⁽⁸⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	15.9	B
10. Center St./Main St. ⁽⁹⁾	TWSC	>35.0 seconds but >4.0 hour cumulative delay on minor street approach	F	17.7	B
11. Old Mammoth/Main St.	Signal	16.5	B		

Notes:

(1) TWSC = two-way stop controlled; Signal = controls all lanes of an intersection.

(2) LOS = level of service

(3) Mitigation measures are prescribed by the General Plan.

(4) Roundabout implemented consistent with General Plan mitigation.

(5) Provisions of separate southbound left- and right-turn lanes and an eastbound acceleration lane along Lake Mary Road (to accommodate two-stage left turns from Lakeview to Lake Mary) consistent with General Plan mitigation.

(6) Traffic signal to be installed consistent with General Plan mitigation.

(7) USPO = United States Post Office

(8) Left turns onto Main Street from both directions will be prohibited with installation of a traffic signal at Center/Main. Left turns prohibited would be diverted to the intersection at Center Street.

(9) Traffic signal to be installed with General Plan mitigation.

(10) **Italic and Bold** = unsatisfactory LOS and exceeds four vehicle-hour criteria

Source: Traffic Impact Analysis prepared by LSA in May 2008.

As shown in Table IV.M-11, all study intersections would continue to operate within or below the Town's threshold of significance under long-range conditions plus Project with General Plan mitigation provisions. No additional improvements outside of the prescribed mitigation measures of the General Plan are required based on the evaluation of LOS at the study intersections in the General Plan plus Project scenario.

Thus, cumulative impacts would be *less than significant* and no mitigation measures are required for the long-range Town buildout conditions.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure TRANS-2, traffic impacts would be reduced to a *less-than-significant* level.

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IV. ENVIRONMENTAL IMPACT ANALYSIS

N. UTILITIES

INTRODUCTION

This section addresses the subject of utilities with respect to the Mammoth Crossing Project (“Project”) and includes an examination of the existing services provided to the Project site, future needs, and the potential impacts the Project would have on those services. The utilities section is subdivided into the following four sections: (1) wastewater; (2) water; (3) electricity; and (4) propane.

Project Details

The Project is situated within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan, as well as amendments to the *Town of Mammoth Lakes General Plan*, which would be required to accommodate the Project’s proposed land uses. The Project being considered in this Draft EIR is conceptual and represents what could be developed once the proposed amendments have been approved and adopted by the Town. Once the Project reaches the Final Development Plan stage the specific details of the Project may be subject to change.

The Project would require the demolition of existing structures and grading of the topographic features of the Project site to the extent necessary for construction of the Project. Development of the proposed Project would include the construction of the following: up to 742 condominium/hotel rooms; up to approximately 69,150 square feet of hotel amenities and operations, and general retail uses; 40,500 square feet of retail development; and 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing, totaling 45,991 square feet, would be required to be provided as part of the Project, some of which would be constructed off-site as separate projects that will require independent environmental reviews and analyses. Proposed development at the three Project sites, approximately nine acres, would involve multiple buildings ranging in height from one to approximately seven stories. The Project’s fourth site, approximately one acre, proposes no new development as part of this Project. This parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and as part of this Project, is proposed to be incorporated as approved into the Specific Plan boundary. For a detailed discussion of the Project description, refer to Section III, Project Description, of this Draft EIR.

1. WASTEWATER SERVICES

ENVIRONMENTAL SETTING

The Mammoth Community Water District (“MCWD”) was formed in 1958 to provide water and wastewater services to the Town of Mammoth Lakes (“Town”). The MCWD boundaries include 3,640 acres of land in the developed portion of the Town of Mammoth Lakes. The Town of Mammoth Lakes includes approximately 2,500 acres of privately owned land in the developed portion of the 24-square mile incorporated area. The remaining incorporated area is publicly owned and is managed by the Inyo National Forest. A major characteristic of the Town is the seasonality of land use activities. As a result, the MCWD experiences large fluctuations in demand for water and wastewater service. During the seven-month winter ski season, activity is centered in the Town. During the summer months of July, August, and September, outdoor recreation activities shift to areas outside of the Town. The greatest demand for water service occurs during the summer months when irrigation of residential landscaping takes place. October and November represent the lowest period of demand for service from the MCWD. The majority of the water demand on the District’s system comes from residential uses.¹

Wastewater lines within the boundaries of the Town are owned, operated and maintained by MCWD. The MCWD’s sewage collection system includes 13 wastewater pump stations and over 35 miles of wastewater mains and interceptors. The MCWD sewer collection system consists of four main wastewater lines ranging in size from 6 to 18 inches in diameter, located within Old Mammoth Road, Meridian Boulevard, Sierra Star Golf Course to Center Street, and Main Street. The interceptor lines vary in diameter from 18 to 21 inches.²

As illustrated on Figure IV.N-1, Existing Sewer Lines, the wastewater generated in the Project area is conveyed to the MCWD Wastewater Treatment Plant (WWTP) at the following existing water mains in the following locations:

- Site 1, wastewater will enter the 12 inch main in Lake Mary Road;
- Site 2 wastewater will enter the eight inch main on Minaret Road; and
- Site 3 wastewater will enter the eight inch main located behind the Holiday Haus off of Main Street.

¹ MCWD, 2005 Urban Water Management Plan, website: <http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, January 17, 2008.

² Town of Mammoth Lakes, 2005 General Plan Update Revised Draft Program Environmental Impact Report, website: <http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm>, January 17, 2008.

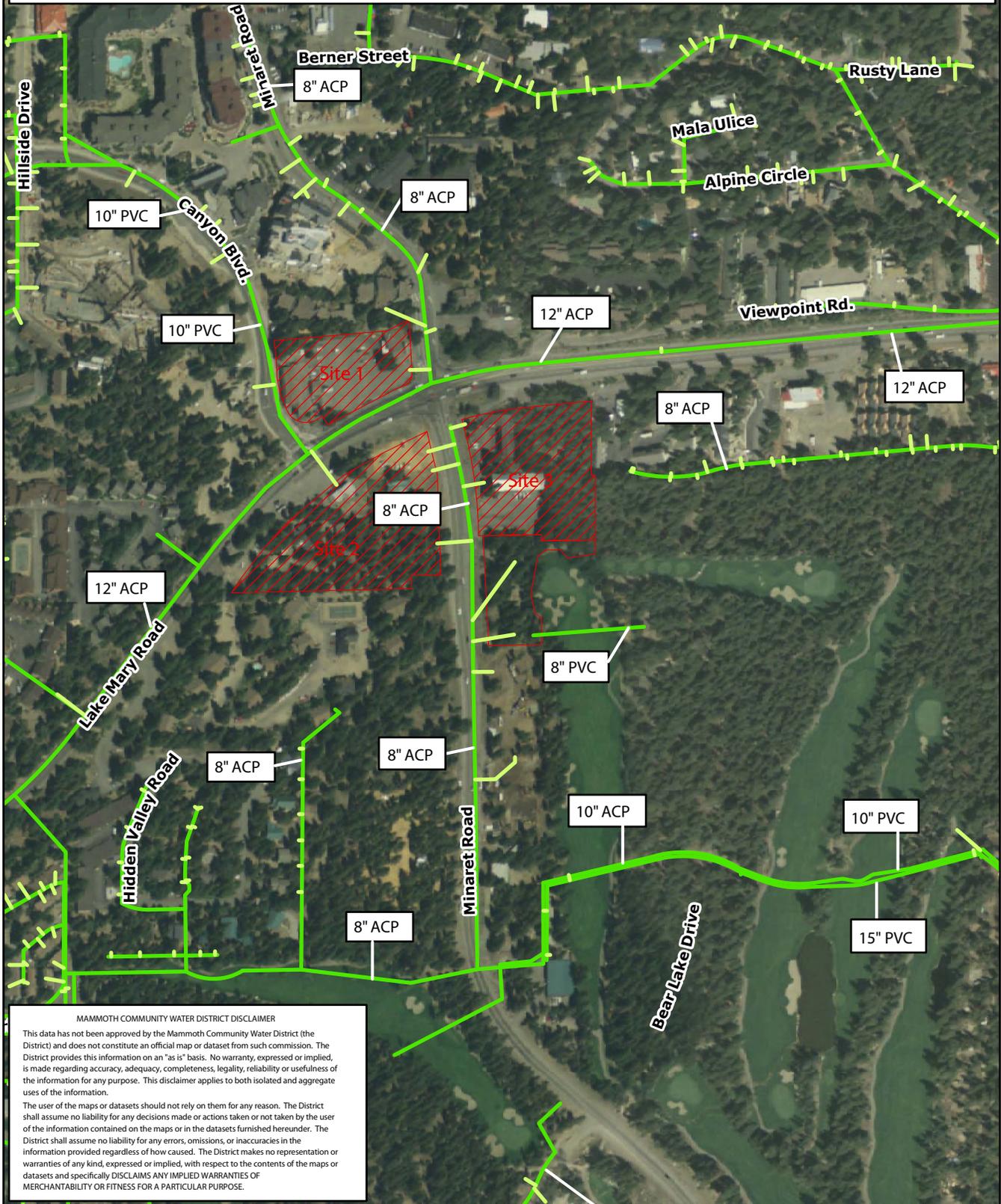


Mammoth Community Water District
 Mammoth Area Geographic Information Center
 PO Box 597
 Mammoth Lakes, CA 93546
 (760) 934-2596
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Map Legend

- Existing Sewer Line Main
- Existing Sewer Line Lateral
- Mammoth Crossing Site
- PVC - PVC Pipe
- ACP - Asbestos Concrete Pipe



MAMMOTH COMMUNITY WATER DISTRICT DISCLAIMER

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Figure IV.N-1
 Existing Sewer Lines

The WWTP provides advanced secondary treatment, which includes biological treatment, filtration, and disinfection through the utilization of chlorine. The WWTP is designed to provide treatment for peak daily flows of 4.9 million gallons per day (“mgd”). The current average daily flow is 1.5 mgd³ with a peak daily flow of 2.6 mgd on holidays and weekends. Treated wastewater is currently discharged to Laurel Pond, an effluent dominated water body located approximately 5.5 miles southeast of the Town on United States Forest Service (“USFS”) land. The MCWD holds a waste discharge permit and has been discharging treated effluent to this pond since 1985. Disposal occurs at the pond through percolation into the ground and evaporation into the atmosphere. The existing WWTP is designed to accommodate the average and peak amounts of wastewater generated in the community through the year 2025.⁴

Proposed Improvements

MCWD is proposing to upgrade the water treatment process to California Code of Regulations Title 22 (“Title 22”) tertiary treatment as part of their new Recycled Water Project, which involves improving the existing filtration and disinfection process at the WWTP. Improvements to the WWTP would include secondary effluent pumping, coagulant/polymer addition and mixing, filtration system upgrades, disinfection system upgrades, recycled water in-plant storage, and recycled water pumping equipment. The system will be designed for peak filtration and disinfection flow of 1,600 gallons per minute (“gpm”), equivalent to 2.3 mgd. At current WWTP flows experienced during the irrigation season, the system is initially expected to produce an average flow of 1.4 mgd of disinfected tertiary effluent suitable for unrestricted irrigation per Title 22.⁵

In addition to improved treatment processes, the Recycled Water Project proposes adding pipelines for distribution of the treated water for irrigation purposes. Distribution facilities will include a recycled water pumping station to be located in the WWTP, adjacent to the storage basin. The pumping station will feed three force mains for conveyance to the Sierra Star Golf Course and the existing nine-hole Snowcreek Golf Course, as well as Shady Rest Park. A below grade concrete receiving tank with level transducer will be provided at each golf course. Receiving tank level will be transmitted to the WWTP pumping station to control pump operation and speed. The receiving tanks will be sized to provide just sufficient volume to allow adequate pump cycling at the WWTP pumping station. The receiving tanks will be connected to the wet well of existing golf course irrigation pumping stations, currently supplied by well water storage ponds. Isolation valves will be installed in the line connecting the recycled water receiving tank and the on-site irrigation pumping station wet well, and in the line connecting the well

³ Hegeman, Ericka, Public Affairs and Environmental Specialist, Mammoth Community Water District, correspondence, CAJA staff, May 18, 2006.

⁴ MCWD, 2005 Urban Water Management Plan, website: <http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 14, 2008.

⁵ Bauer Planning & Environmental Services, Inc. Mammoth Community Water District, Recycled Water Distribution Project, Subsequent Final EIR, March 15, 2007.

water storage pond and the wet well. This will eliminate the need for recycled water open storage in the existing golf course ponds, and will allow well water to be used as backup.⁶

The 2006 Recycled Water Distribution Project EIR identifies the following customers to receive the reclaimed water during summer months: Sierra Star Golf Course, the existing nine-hole Snowcreek Golf Course, and Shady Rest Park. The additional nine-hole expansion to the Snowcreek Golf Course may also receive reclaimed water. The additional nine-hole expansion to the Snowcreek Golf Course may also receive reclaimed water. MCWD certified of the final Recycled Water Project EIR at its March 15, 2007 meeting. The Recycled Water Project is anticipated to be complete by the summer of 2010. Other planned improvements to the system include upgrading the filter backwash system at Groundwater Treatment Plant #2. The planned upgrade would increase capacity in the sewer lines by about 300 to 350 gpm. This would be achieved by reclaiming the filtered backwash water and could recycle as much as 95 to 99 percent of the backwash that currently goes into the sewer. Although the improvement has not yet been designed, construction may occur by winter 2008.

REGULATORY SETTING

Regional Water Quality Control Board

The Town is within the jurisdictional boundaries of the Lahontan Regional Water Quality Control Board (“Lahontan RWQCB”). The Lahontan RWQCB develops and enforces water quality objectives and implementation plans that safeguard the quality of water resources in its region. In accordance with Section 13263 of the California Water Code, the RWQCBs are authorized to issue Waste Discharge Requirements as well as periodically review self-monitoring reports submitted by the discharger, and perform independent compliance checking, and take enforcement action if necessary. Chapter 4.4 of the Water Quality Control Plan for the Lahontan Region, North and South Basins, outlines policies and regulations for municipal wastewater treatment, disposal, and reclamation. The standards contained within the Water Quality Control Plan are designed to provide applicants with a uniform approach for the design and installation of adequate systems to control wastewater and wastewater treatment/sewage disposal impacts from the Town, and to prevent any potential contamination of groundwater at the discharge site.

Urban Water Management Plan

In accordance with the California Water Code 10610, also known as the Urban Water Management Planning Act (“Act”) of 1984, the MCWD adopted an Urban Water Management Plan (“2005 UWMP”) in December 2005. The Act states that the UWMP must be updated every five years to identify short-term and long-term water demand management in order to meet growing water demands during normal, dry and multiple dry years. The 2005 UWMP provides information about MCWD’s responsibilities towards water supply and water recycling in the community including wastewater generation, collection, treatment, and disposal.

⁶ *Bauer Planning & Environmental Services, Inc. Mammoth Community Water District, Recycled Water Distribution Project, Subsequent Draft EIR, September 2006.*

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) exceed treatment requirements of the applicable Regional Water Quality Control Board;
- (b) require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- (c) result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Wastewater Services Issues Not Analyzed Further

As discussed in the Initial Study that was prepared for the Notice of Preparation (see Appendix A of this Draft EIR) and in Section IV.A, Impacts Found To Be Less Than Significant, of this Draft EIR, the potential impacts associated with Threshold (a) listed above was determined to result in no impact. Therefore, only Thresholds (b) and (c) listed above are addressed in the following discussion.

Project Impacts and Mitigation Measures

Impact UTIL-1 Wastewater Generation

As discussed in Section IV.K, Population and Housing, of this Draft EIR, the Project development as described above, is anticipated to generate 2.43 persons per household, which would result in approximately 139 new residents.⁷ As such, the amount of wastewater generated at the Project site would increase. In order to present a conservative analysis and in accordance with MCWD wastewater demand calculation methodology, wastewater generation for the Project's proposed uses was calculated and is shown in Table IV.N-1. However, since the majority of the proposed units is likely to be occupied seasonally rather than on a year-round basis and would thus not generate wastewater over the course of an entire year, this analysis likely overstates Project impacts. This approach is uniformly applied throughout the environmental impact analyses included in this Draft EIR.

⁷ United States Census Bureau, *Census 2000, State and County Quickfacts*, website: www.census.gov, CAJA staff, January 10, 2008.

**Table IV.N-1
Project Estimated Wastewater Demands**

Unit Type	Size	Average Daily Generation Rate ¹	Total Average GPD	Peak Daily Generation Rate ²	Total Peak GPD
RESIDENTIAL	Dwelling Units (du)				
Hotel/Condo	760 du ³	60 gpd/unit	45,600	100 gpd/unit	76,000
Condo Rooms	24 du ⁴	110 gpd/unit	2,640	150 gpd/unit	3,600
NON-RESIDENTIAL	Square Feet (sf)				
Hotel Amenities and Operations					
Pool/Spa	4,500	640 gpd/1,000 sf	2,880	910 gpd/1,000 sf	4,095
Conference Area	9,000	70 gpd/1,000 sf	630	90 gpd/1,000 sf	810
Restaurant/Bar Area	22,125	510 gpd/1,000 sf	11,284	560 gpd/1,000 sf	12,390
General Commercial ⁵	13,492	150 gpd/1,000 sf	2,024	280 gpd/1,000 sf	3,778
Non Water Use ⁶	76,453	-	-	-	-
Total Wastewater Demands			65,058		100,673
<i>Notes:</i> (1) Calculated from the average of 36 months of usage. (2) Daily average of the peak month water usage over 36 months. (3) 760 rooms are counted as one-bedroom units of which 66 are on-site affordable housing units. (4) Two-bedroom permanent year-round units on site. (5) General commercial water usage includes water use associated with the potential office and personal services (e.g., beauty salons, childcare facilities, real estate sales and reservations, etc.). (6) Non-water usage is calculated at 85% of the total area of hotel amenities and operations less the listed specific uses (i.e., pool/spa, conference, and restaurant/bar).					
<i>Source: Generation Rates provided by MCWD, March 18, 2008.</i>					

As mentioned above, wastewater from the Project site would be conveyed via existing MCWD wastewater infrastructure to the WWTP. Currently, the WWTP treats an average daily flow of 1.6 mgd, a peak daily flow of 2.6 mgd, and has capacity to treat 4.9 mgd. This translates into a remaining capacity of 2.3 mgd of wastewater at average daily flows and 3.2 mgd of wastewater at peak daily flows that can be treated at the WWTP.

Based on the methodology described above, as indicated in Table IV.N-1 above, the Project generates average daily flows of 65,058 gpd, or approximately .06 mgd, and peak use at 100,673 gpd, or approximately 0.10 mgd.

Therefore, the Project's anticipated average daily flow would be approximately four percent of the current usage and the peak daily flow would be approximately four percent of the current usage.⁸ The Project would represent approximately two percent of the peak daily flow capacity of the WWTP treatment for

⁸ Percentages were calculated using $.06/1.6 = .0375$ (~4% of average daily flows) and $.10/2.6 = .0386$ (~4% of peak daily flows).

peak daily flows up to 4.9 mgd.⁹ Thus, Project impacts related to wastewater treatment capacity would be **less than significant** and no mitigation measures are required.

Impact UTIL-2 Wastewater Infrastructure

The Project includes installation of wastewater infrastructure within the Project site to convey wastewater generated by the proposed uses to the existing MCWD wastewater lines. Figure IV.N-1 illustrates the existing wastewater infrastructure expected to serve the Project area. According to MCWD, areas of deficiency have been identified in sewer collection lines in the Project area. However, the connection fees for the Project would help to pay for the necessary upgrades to the sewer collection pipelines (i.e., Wastewater Lateral Lines) in the Project area as a result of the proposed Project as identified by MCWD. In consideration of the above, Project impacts related to wastewater infrastructure would be **less than significant** and no mitigation measures are necessary.

CUMULATIVE IMPACTS

Impact UTIL-3 Cumulative Wastewater Generation

Implementation of the Project in combination with the related projects in Table II-1, Related Projects, in Section II, Environmental Setting, would further increase demands on wastewater treatment capacity. As shown in Table IV.N-2, the Project and the related projects would generate wastewater at an average daily rate of approximately 688,118 peak gpd or approximately .69 mgd and a peak flow rate of approximately 932,608 gpd or approximately .93 mgd. The projects listed in the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall wastewater generation through the project approval process, and would consider project approvals in the light of existing and projected wastewater generation and the remaining capacity of the WWTP. Therefore the cumulative wastewater generation is likely overstated.

⁹ Percentage was calculated using $.10/4.9 = .0204$ (~2% of maximum WWTP flow capacity).

Table IV.N-2
Estimated Average Day and Peak Day Wastewater Generation for Project and Related Projects

Related Project No.	Land Use	Size (units or (square feet)	Average Daily Generation Rate	Total Average GPD	Peak Daily Generation Rate	Total Peak GPD
1	C	31 units	170 gpd/unit	5,270	195 gpd/unit	6,045
2	HDR-1 – RMF-1	14 units	170 gpd/unit	2,380	195 gpd/unit	2,730
3	HDR-1	11 units	170 gpd/unit	1,870	195 gpd/unit	2,145
4	HDR	74 units	170 gpd/unit	12,580	195 gpd/unit	14,430
5	SP	230 units 4,000 sf	110 gpd/unit 510 gpd/1,000sf	25,300 2,040	150 gpd/unit 560 gpd/1,000sf	34,500 2,240
6	V – SP	44 units	170 gpd/unit	7,480	195 gpd/unit	8,580
7	LDR -1-R	19 units	110 gpd/unit	2,090	150 gpd/unit	2,850
8	SP	230 units	110 gpd/unit	25,300	150 gpd/unit	34,500
9	HDR-2 – RMF-2	24 units	110 gpd/unit	2,640	150 gpd/unit	3,600
10	R	28 units	110 gpd/unit	3,080	150 gpd/unit	4,200
11	HDR – R	40 units	110 gpd/unit	4,400	150 gpd/unit	6,000
12	NVSP	251 units	170 gpd/unit	42,670	195 gpd/unit	48,945
13	R	24 units	110 gpd/unit	2,640	150 gpd/unit	3,600
14	R	58 units	110 gpd/unit	6,380	150 gpd/unit	8,700
15	LDR-1-SP	14 units	110 gpd/unit	1,540	150 gpd/unit	2,100
16	HDR - R	106 units	110 gpd/unit	11,660	150 gpd/unit	15,900
17	HDR – CL	198 units	110 gpd/unit	21,780	150 gpd/unit	29,700
18	R – OS	1,250 units 75,000 sf	110 gpd/unit 435 gpd/1,000sf	137,500 32,625	150 gpd/unit 514 gpd/1,000sf	187,500 38,550
19	HDR – CL	11 units	110 gpd/unit	1,210	150 gpd/unit	1,650
20	HDR	14 units	170 gpd/unit	2,380	195 gpd/unit	2,730
21	R	48 units	110 gpd/unit	5,280	150 gpd/unit	7,200
22	HDR – R	45 units	110 gpd/unit	4,950	150 gpd/unit	6,750
23	HDR	24 units	170 gpd/unit	4,080	195 gpd/unit	4,680
24	HDR – R	180 units 21,000 sf	110 gpd/unit 150 gpd/1,000sf	19,800 3,150	150 gpd/unit 280 gpd/1,000sf	27,000 5,880
25	C	3,600 sf	150 gpd/1,000sf	540	280 gpd/1,000sf	1,008
26	HDR – R	118 units	110 gpd/unit	12,980	150 gpd/unit	17,700
27	IP	340 parking spaces	n/a	n/a	n/a	n/a
28	IP – PS	17,200 sf	150 gpd/1,000sf	2,580	280 gpd/1,000sf	4,816
29	HDR – AH	405 units 3,000 sf	135 gpd/unit 150 gpd/1,000sf	54,675 450	180 gpd/unit 280 gpd/1,000sf	72,900 840
30	HDR – CG	339 units 28,205 sf	110 gpd/unit 150 gpd/1,000sf	37,290 4,230	150 gpd/unit 280 gpd/1,000sf	50,850 7,896
31	R	800 units 29,000sf com. 30,000sf conf.	110 gpd/unit 150 gpd/1,000sf 70 gpd/1,000sf	88,000 4,350 2,100	150 gpd/unit 280 gpd/1,000sf 90 gpd/1,000sf	120,000 8,120 2,700
32	HDR – CL	12 units	110 gpd/unit	1,320	150 gpd/unit	1,800
33	R-OS	10,393 sf	n/a	n/a	n/a	n/a

**Table IV.N-2
Estimated Average Day and Peak Day Wastewater Generation for Project and Related Projects**

Related Project No.	Land Use	Size (units or (square feet)	Average Daily Generation Rate	Total Average GPD	Peak Daily Generation Rate	Total Peak GPD
34	RMF-2	108 units	110 gpd/unit	11,880	150 gpd/unit	16,200
35	IP	18,200 sf	n/a	n/a	n/a	n/a
36	HDR – CL	74 units	110 gpd/unit	8,140	150 gpd/unit	11,100
37	IP	13,000 sf	n/a	n/a	n/a	n/a
38	IP	20,000 sf	n/a	n/a	n/a	n/a
39	HDR - RMF-1	10 units	110 gpd/unit	1,100	150 gpd/unit	1,500
40	HDR - RMF-1	10 units	135 gpd/unit	1,350	180 gpd/unit	1,800
Related Projects Total				623,060		831,935
Project Total				65,058		100,673
Cumulative Total				688,118		932,608
<i>Land Use Key:</i> <i>sf = square feet</i> <i>LDR-1 = Low-Density Residential 1</i> <i>LDR-2 = Low-Density Residential 2</i> <i>HDR-1 = High-Density Residential 1</i> <i>HDR-2 = High-Density Residential 2</i> <i>RSF = Residential Single Family</i> <i>RMF = Residential Multi-Family</i> <i>RR = Rural Residential</i> <i>C = Commercial</i> <i>CG = Commercial General</i> <i>OS = Open Space</i> <i>IP = Institutional Public</i> <i>R = Resort</i> <i>I = Industrial</i> <i>NVSP = North Village Specific Plan</i>						
<i>Sources:</i> Town of Mammoth Lakes Community Development Department, Ellen Clark, Senior Planner, January 2008. 2005 General Plan Land Use Designations, website: http://www.ci.mammoth-lakes.ca.us , March 2008. MCWD Wastewater Generation Rates provided March 2008.						

The potential need for the related projects to require upgrades to the WWTP to accommodate wastewater generated by these projects is site-specific, and there is little, if any, cumulative relationship between the development of the Project and the related projects. In addition, many of the related projects consist of redevelopment that would result in the elimination of existing wastewater generation patterns at these sites. Thus, the total amount of wastewater generation shown in Table IV.N-2 is likely overstated. Nonetheless, as noted above, the MCWD has a remaining capacity of 2.3 mgd of wastewater at average daily flows and 3.2 mgd of wastewater at peak daily flows that can be treated at the WWTP; thus cumulative impacts to the remaining capacity of the WWTP would be *less than significant* and no mitigation measures are required.

Impact UTIL-4 Cumulative Wastewater Infrastructure

MCWD has identified deficiencies in the collection system that would be exacerbated by the Project and the related projects. MCWD conducted a *Connection Fee Study* in 2005 to evaluate the need for future wastewater facilities and the costs associate with the construction of these facilities. As part of the 2005 *Connection Fee Study*, a sewer model was created to develop projections for future wastewater demands. While the Project was included in the 2005 *Connection Fee Study* the increased densities associated with the Project were not taken into account in this *Connection Fee Study* or in the sewer model. If multiple

projects near North Village Specific Plan area and Sierra Star Master Plan area are granted density bonuses similar to what is proposed in the Mammoth Crossing Project, then future demands would need to be reassessed to determine the impacts on the sewer collection system.

Through the *Connection Fee Study*, MCWD identified three wastewater collection system upgrades needed to accommodate future growth in the Town. These projects and proposed completion dates are as follows:

- (1) New sewer trunk line along Meridian Boulevard from Old Mammoth Road to the WTP to be completed by 2010;
- (2) Increase the capacity of sewer lines on Center Street from Manzanita Road to Main Street/State Route 203 to be completed by 2013; and
- (3) New Shady Rest Relief Sewer through the Shady Rest Tract project, located near the intersection of Laurel Mountain Road and Main Street/State Route 203 to be completed by 2010.

While the three collection system upgrades identified above were included in the 2005 *Connection Fee Study*, the timeline of construction of these projects are subject to availability of connection fees that are collected and the schedule is subject to change. The third project identified above is required as part of a development that has not yet been constructed on that site. MCWD cannot build the Shady Rest Relief Sewer until the Shady Rest Tract developer has applied for a water/wastewater permit. If the Shady Rest Tract project is not built prior to occupancy of the Mammoth Crossing Project, then due to existing deficiencies a different sewer upgrade project to increase the capacity of sewer lines along Manzanita Road between Dorrance Road and Center Street would be required. Therefore, because these future wastewater infrastructure projects are not complete at present the Project's contribution to overall wastewater infrastructure within the Town would be cumulatively considerable, and cumulative wastewater infrastructure impacts would be *significant*. However, implementation of the following mitigation measure would reduce the Project's contribution to overall wastewater infrastructure impacts to a less-than-significant level.

Mitigation Measure UTIL-4 Cumulative Wastewater Infrastructure

The Project Applicant shall coordinate with MCWD to design and construct an equivalent sewer upgrade project to increase the capacity of sewer lines along Manzanita Road between Dorrance Road and Center Street if the Shady Rest Tract project is not complete by occupancy of the Mammoth Crossing Project.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to wastewater services would be *less than significant* with implementation of Mitigation Measure UTIL-4 Cumulative Wastewater Infrastructure.

2. WATER SERVICES

ENVIRONMENTAL SETTING

Regulatory Setting

Mammoth Community Water District

As previously discussed, Mammoth Community Water District (“MCWD”) provides water and wastewater services to the Town and portions of United States Forest Service (“USFS”) lands. The MCWD serves the Town with a network of water pipelines that range from 2 to 12 inches in diameter. The amount of water available to the MCWD in any given year is linked to the precipitation (snowfall) received during the season of October through March as measured at Mammoth Pass. In the past thirty years, below average precipitation conditions have been experienced for 50 percent of those years. In 30 percent of the years, seasons with less than 70 percent of average precipitation have been experienced. Surface water availability is directly impacted by the amount of precipitation received in a season whereas impacts to groundwater sources are more gradual over a period of years. The greatest demand for water service occurs during the summer months when irrigation of residential landscaping takes place. October and November represent the lowest period of demand for service from the MCWD. The majority of the water demand on MCWD’s system comes from residential uses.

The MCWD has water entitlements from Mammoth Creek for domestic uses, storage rights in Lake Mary, and operates eight groundwater production wells within the MCWD service area. The Town receives domestic water from MCWD from two primary sources: 50 percent from local surface water supplied by snowmelt water diverted from the Mammoth Creek watershed and 50 percent from Mammoth Basin watershed groundwater pumped from wells within the Town’s boundaries.¹⁰ The MCWD monitors its surface and groundwater sources to ensure that water supplies are not over-drafted. Surface water levels and flow rates are monitored at 12 locations throughout the Mammoth Basin watershed. Groundwater levels are monitored in the MCWD’s eight production wells, as well as 15 shallow and deep monitoring wells. Production from the eight wells varies considerably in response to drought conditions and cycling of customer water demand, but overall trends show increased production over time.¹¹ The MCWD prepares an annual groundwater monitoring report that evaluates groundwater levels, surface flow and water quality. There is no claim or evidence that the groundwater basin is being over drafted.¹²

Urban Water Management Planning Act

As previously discussed, in accordance with the California Water Code 10610, also known as the Urban Water Management Planning Act (“Act”) of 1984, the MCWD adopted its current UWMP in December

¹⁰ Town of Mammoth Lakes 2005 General Plan Update Revised Draft Program Environmental Impact Report, website: <http://www.ci.mammoth-lakes.ca.us/General%20Plan/DEIR.htm>, CAJA staff, March 4, 2006.

¹¹ MCWD Recycled Water Project Final EIR, certified, March 15, 2007.

¹² Ibid.

2005. The Act states that the UWMP must be updated every five years to identify short-term and long-term water demand management in order to meet growing water demands during normal, dry and multiple dry years. MCWD updated its 2005 UWMP to include proposed development associated with the 2005 General Plan Update. The Town adopted the revisions contained in the 2005 General Plan Update on August 15, 2007. The development proposed in the Project was only partially accounted for in the 2005 General Plan Update and thus, the 2005 UWMP. This is discussed in more detail under the Methodology heading further below in this section.

Groundwater Management Act

In an effort to monitor groundwater availability and in accordance with Assembly Bill (“AB”) 3030, the Groundwater Management Act, MCWD adopted a Groundwater Management Plan (“2005 GWMP”) in July 2005.¹³ AB 3030 provides local water agencies with procedures to develop a groundwater management plan so those agencies can manage their groundwater resources efficiently and safely while protecting the quality of supplies. Under AB 3030, the development of a GWMP by a local water agency is voluntary. However, once a plan is adopted, the rules and regulations contained therein must also be adopted to implement the program outlined in the plan. Information and analysis contained within the 2005 GWMP is based on previously published reports, conclusions of recent research and MCWD data compilations on hydrologic conditions, facility locations, and water production for the Mammoth Basin watershed.

Senate Bill 610 and SB 221

Senate Bill (“SB”) 610 and SB 221 amended State law in January 2002 to facilitate the exchange of water supply availability information during the planning processes of certain developments. SB 610, which requires water supply assessments (“WSA”) to be furnished to local governments for inclusion in the environmental documentation for certain projects, primarily relates to the California Water Code. SB 221 requires an affirmative written verification of sufficient water supply for the approval of certain projects. The WSA describes the relationship between projected demands on the Town’s water supply and the availability of that supply under normal and dry years. The WSA is a comprehensive document, which is prepared to assist the Town Council in making decisions related to land use and is designed to assist in water supply planning efforts.

Section 10912(a) of the California Water Code defines seven types of projects which are subject to the mandates of SB 610, such as: (1) a proposed residential development of more than 500 dwelling units; (2) a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space, (3) a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a proposed hotel or motel, or both, having more than 500 rooms; (5) a proposed industrial, manufacturing or processing plant, or industrial park planned to house more than 650,000 square feet of floor area; (6) a mixed-use project that

¹³ MCWD, 2005 Urban Water Management Plan, website:
<http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 4, 2006.

includes one or more of the projects specified in this subdivision; and (7) a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

METHODOLOGY

The Town formally requested a Water Supply Assessment (“WSA”) for the Project on October 30, 2007. The MCWD released a WSA for the Project on March 25, 2008, herein referred to as “Project WSA.” The information and analysis in this section is based primarily on the Project WSA, the 2005 GWMP, and other information provided by MCWD. Information from the 2005 UWMP was utilized for the Project WSA; however modifications were made to the estimated future water supply demands for the community based upon the increased density proposed for the Project. As described in Section III, Project Description of this Draft EIR, the Project is proposing to increase the allowable densities beyond the densities allowed in the Specific Plan. Based upon the proposed and current zoning for the Project site, MCWD estimates that the proposed Project will result in an increase annual demand of approximately 65 af over the existing zoning for the site. Therefore, the estimated water supply demand total of 4,858 afy as identified in the 2005 UWMP has been increased to include the additional 65 afy for a total of estimated water supply demand of 4,963 afy.

The Project details at the time of the preparation of the Project WSA included up to 940 residential rooms and 125,570 square feet of commercial space and other amenity areas. For the purposes of the Project WSA, the residential uses were split into hotel uses and condominium uses. The proposed 48 condominium rooms were converted into 24 two-bedroom condominium units to coincide with MCWD’s meter record data. The Project’s remaining 892 residential, rooms were counted as hotel rooms and were assumed separate units for a worst-case scenario assessment of the potential Project impacts. The commercial/amenity space, pool/spa, conference center, restaurant, and general commercial uses were split out of the total square footage. These numbers have since been slightly reduced; however they still exceed allowed density and therefore the additional 65 afy is appropriate as a conservative estimate. The remainder of the commercial/amenity areas has been considered non-water usage since they are wrapped up into typical condominium and hotel demand estimates.

General Plan policies related to water use are addressed in Section IV.I, Land Use, of this Draft EIR. With the exception of the Project WSA, which is in Appendix L to this Draft EIR, the documents identified above are incorporated by reference and are all available from the Town of Mammoth Lakes, the Mammoth Community Water District, or via their respective websites.

EXISTING CONDITIONS

Water Supply & Availability

In accordance with the State Urban Water Management Planning Act, MCWD analyzed water supply in the 2005 UWMP by addressing availability of water during normal, single dry and multiple dry water years. Table IV.N-3 provides a breakdown of existing water supplies for surface and groundwater

sources. Normal water years are based on a 10 percent deviation from an April 1st average snow pack of 43 inches or 38.7 to 47.3 inches. Normal water years historically have occurred every nine years. The base years for normal water years on which MCWD analyzes its data are: 1946, 1949, 1954, 1971, 1984, 1996 and 1997. According to the *Guidebook to Assist Water Suppliers in the Preparation of a 2005 UWMP*, a single dry year is "generally considered to be the lowest annual runoff for a watershed since the water-year beginning in 1903." The records for the Mammoth Basin begin in 1928 and the lowest April 1st snow water content, which generally equates to the runoff for the watershed occurred in 1977 with about 12 inches. This data was used in the 2005 UWMP to prepare projections for a single dry year where essentially no surface water would be available for MCWD to divert. Groundwater data for single dry water years is determined using the driest years for which the MCWD's production wells were in use: 1992 for wells 1, 6, 10 and 15; 2001 for wells 16, 17, 18, and 20. In addition, MCWD bases multiple dry years on the lowest average runoff for a consecutive, multiple year period (i.e., three years or more) since 1903. The driest multiple year period for the Mammoth watershed was the six years from 1987 to 1992, which averaged 28.7 inches of snow water content at Mammoth Pass.

**Table IV.N-3
Existing Water Supply Reliability⁽¹⁾**

Supply	Normal Water Year	Single Dry Water Year	Multiple Dry Years			
			Year 1	Year 2	Year 3	Year 4
Projected Surface Water	2,760 ⁽²⁾	0	1,780	1,500	1,100	1,084
Projected Groundwater Wells	4,000 ⁽³⁾	3,410	3,410	3,408	3,408	3,408
Projected Total Supply	6,760	3,410	5,190	4,908	4,508	4,492

Notes:

- (1) Units of measure are acre-feet (af) per year. An af equals approximately 325,829 gallons.
- (2) Total MCWD is "entitled" to.
- (3) Total MCWD has a "right" to.
- (4) While MCWD currently has surface water rights that total a maximum of 2,760 acre-feet annually, the bypass flow requirements that MCWD operates under have not been permanently established and the final bypass requirements that are eventually established could potentially result in less surface water being available to MCWD. In addition, the volume of groundwater noted in this table is the maximum amount of groundwater that MCWD has projected to pump in any given year and does not necessarily represent the safe yield of the aquifer.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 9, page 16, March 25, 2008.

Surface Water

MCWD is currently entitled, through two licenses and one permit, to divert 2,760 acre-feet per year ("afy") from Lake Mary at a maximum diversion rate of 5 cubic feet per second ("cfs") from November 2nd to April 30th and 5.039 cfs from May 1st to November 1st. Surface water is delivered from Lake Mary to the MCWD water system through a 10-inch pipeline along Lake Mary Road. Surface water storage rights are limited to 660 acre-feet ("af") annually, of which 606 af may be collected between April 1st and June 30th, and 54 af may be collected between September 1st and September 30th of each year. The MCWD is also limited to a maximum drawdown in Lake Mary of 3.0 feet during the period between June

1st and September 15th, and a total maximum annual drawdown of 5.7 feet. Recent improvements to the Lake Mary surface water treatment plant allow MCWD to utilize the full 2,760 af permitted in normal and wet precipitation conditions. The volume of surface water in normal years is based on the maximum volume of water available through MCWD's surface water rights. However, the volume of surface water in multiple dry years is based on the actual surface water that could have been available in 1992, the last year of a six-year drought.¹⁴

Since MCWD's diversion facilities are located on USFS land, it has authority over MCWD water operation activities through a Master Operation Agreement ("MOA") developed in 1977. The MOA provides terms for instream flow requirements that are designed to protect aquatic species in Mammoth Creek. Additionally, the amount of water that MCWD may store or divert is influenced by the bypass flow requirements in Mammoth Creek that are included as part of MCWD's water rights. MCWD measures Mammoth Creek flows at its Old Mammoth Road gage located near Mammoth Creek Park. MCWD is only allowed to directly divert natural flows entering Lake Mary and divert natural flows to storage when the flows, as measured at the Old Mammoth Road gage, exceed the bypass flow requirements. When the flows at MCWD's Old Mammoth Road gage are equal to or less than the bypass flow requirements, no water may be directly diverted or diverted to storage, and MCWD must bypass all incoming flows to Lake Mary.

MCWD is second to the City of Los Angeles Department of Water and Power ("LADWP") for being the largest diverter of Mammoth Creek water. LADWP exercises its rights to divert 440 afy upstream of U.S. Highway 395, and 4,400 afy downstream of U.S. Highway 395 in the Chance Meadows area, to be used for grazing purposes. However LADWP's water rights are older and do not include instream flow requirements.¹⁵

While MCWD must currently operate under the bypass flow requirements, there is potential for these requirements to become modified. MCWD is currently preparing an EIR that evaluates the environmental effects of the proposed bypass flow requirements for Mammoth Creek. The outcome of the Mammoth Creek EIR and the resulting decision by the State Water Resources Control Board could modify the existing temporary bypass flows to a different regime that could result in less surface water being available to MCWD. Surface water supply volumes used in the preparation of the Project WSA assumed that the existing bypass flow requirements will remain as they are currently established. Potential reductions in surface water supplies in the future are a possibility, but the amount of these reductions is currently unknown.¹⁶

¹⁴ MCWD, 2005 Urban Water Management Plan, website:
<http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 4, 2006.

¹⁵ CH2M Hill, 2000 Draft EIR for the Proposed Changes for Mammoth Creek Instream Flow Requirements, Point of Measurement, and Place of Use.

¹⁶ MCWD SB 610 WSA for the Mammoth Crossing Project, page 9, March 25, 2008.

Groundwater

The 2005 GWMP describes a monitoring and operation plan for the long-term use of local groundwater and surface water resources. The intent of the 2005 GWMP is to ensure that groundwater resources are managed in a manner that ensures sufficient, high quality groundwater resources while minimizing potential environmental impacts. The MCWD pumps groundwater from the Mammoth Basin watershed, which is located within the Long Valley Groundwater Basin identified by the California Department of Water Resources (“DWR”) as part of the South Lahontan Hydrologic Region. Mammoth Basin is the watershed of Mammoth Creek and is bounded on the south by the drainage divide of Convict Creek; on the west by the Mammoth Crest; on the north by the drainage divide of Dry Creek; and on the east extending along the watershed of Hot Creek. The area of the Mammoth Basin is about 71 square miles and extends approximately 13 miles west to east and nine miles north to south.

The Mammoth Basin has not been adjudicated or identified by DWR as being overdrafted. Groundwater is pumped from eight production wells located within the MCWD’s service area. According to the 2005 GWMP, groundwater may not be extracted at a rate greater than 4,000 afy.¹⁷ During the past five year period (2002 to 2006), MCWD pumped 10,327 af of groundwater, averaging 2,065 afy. As shown in Table IV.N-4, the maximum volume pumped occurred in 2003 and amounted to 2,520 af. When precipitation is lower than normal the use of groundwater is increased, as less surface water supply is available. Production volumes of groundwater in any one year are dependent on the type of precipitation year experienced and consequent availability of surface water. During dry-year periods, groundwater levels within the Mammoth Basin decrease due to increased pumping and less recharge. During normal and above-normal precipitation years, groundwater levels increase and tend to fully recover after two years of normal precipitation.

Table IV.N-4
Annual Volumes⁽¹⁾ of Groundwater Pumped

Well No.	2003	2004	2005	2006	2007
1	184	71	188	297	185
6	454	347	554	1	473
10	602	500	577	135	335
15	807	381	244	390	706
16	107	239	55	0	144
17	172	138	100	229	277
18	114	58	226	1	59
20	80	187	167	13	247
Total Acre-Feet	2,520	1,921	2,111	1,066	2,426

Notes:

- (1) Units of measure are acre-feet per year. An acre-foot equals approximately 325,821 gallons.
- (2) Groundwater pumpage reflects the metered amount of water pumped from individual wells, which tends to vary slightly from the flow measured through the treatment plants.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 5, page 12, March 25, 2008.

¹⁷ 4,000 afy is the maximum amount of groundwater projected to pump in any given year and does not necessarily represent the safe yield of the aquifer.

Fire Flow

In addition to supplying water for domestic uses, MCWD also supplies water for fire protection services, in accordance with Mammoth Lakes Fire Protection District (“MLFPD”) requirements, also discussed in Section IV.K., Public Services–Fire Protection, of this Draft EIR. Fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). The MLFPD-established fire flow requirements vary from 1,500 gpm in low density residential areas and 2,000 gpm high density residential to 2,500 gpm in commercial areas for two hours. Additionally, for high-rise construction, MLFPD requires a pressure of 100 pounds per square inch (“PSI”) at the roof. In any instance, a minimum residual water pressure of 20 PSI is to remain in the water system while the required gpm is flowing. According to MCWD, depending upon where the Project ties into the water distribution system, system pressures in the Project area may range from 80 to 150 PSI, meeting the MLFPD goal of 50 to 150 psi for fire protection purposes.¹⁸

Local Water Infrastructure

The MCWD serves the Town with a network of water pipelines that range from 2 to 12 inches in diameter. The water pipelines are constructed of either steel, ductile iron pipe (“DIP”), or polyvinyl chloride (“PVC”). The existing water pipelines in the area are 8” and 10” DIP. Figure IV.N-2, illustrates the existing water lines in the Project area.

Water Treatment

In 2004, MCWD completed modifications to the Lake Mary surface water treatment plant to meet new standards of the California Department of Health Services. As a result of these modifications, the production capacity of the plant is now rated at the 5 cfs diversion rate allowed in the water rights permit. These improvements have enabled MCWD to utilize the full 2,760 af of water available from its state water right permits in normal and wet precipitation conditions.¹⁹

¹⁸ E-mail correspondence Ericka Hegeman at MCWD and CAJA Staff, May 22, 2008.

¹⁹ MCWD, 2005 Urban Water Management Plan, website:
<http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 4, 2006.

Projected Water Demand

The majority of the water demand on MCWD's system comes from residential uses; with 30 percent from condominiums, 18 percent single family units, and 4 percent multifamily units.²⁰ The total water demand in 2005 amounted to 3,423 af. This value includes golf course irrigation, system use, and unaccounted for water. Table IV.N-5 shows the past, current, and projected future water demands.

**Table IV.N-5
Past, Current, and Projected Water Use⁽¹⁾**

Water Use Sector	2000	2005	2010	2015	2020	2025
Single Family Residential	515	549	586	623	659	696
Condominium	961	948	960	976	988	1,000
Multi-Family Residential	144	140	211	282	353	424
Commercial/Industrial and Public ⁽²⁾	217	257	374	519	615	710
Motel / Hotel ⁽³⁾	112	111	304	508	701	893
Public Sector ⁽⁴⁾	170	296	n/a ⁽⁴⁾	n/a ⁽⁴⁾	n/a ⁽⁴⁾	n/a ⁽⁴⁾
Golf Course ⁽⁵⁾	297	263	400	400	400	400
Other ⁽⁶⁾	53	107	80	80	80	80
Unaccounted	486	752	760	760	760	760
Total	2,955	3,423	3,674	4,147	4,555	4,963

Notes:

- (1) Units of measure are acre-feet (af) per year. An af equals approximately 325,821 gallons. Groundwater data in this table is based upon metered flows from the MCWD's groundwater treatment plants, which varies slightly from amounts measured from individual wells.
- (2) Commercial includes mixed uses such as restaurants, condo/hotel, retail, etc.
- (3) Existing hotel/motel water-use includes those units that are separately metered and does not include units that share water meters with commercial.
- (4) Public Sector is included in commercial for future projections for consistency with the Town's General Plan Update Draft EIR (2005).
- (5) Golf course water use is based on existing demand from Sierra Star and Snowcreek golf courses.
- (6) Other = treatment plant process water, fire fighting, line cleaning, etc.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 8, page 15, March 25, 2008.

When projected future water demand estimates are compared with current supply data, it is projected that water supply deficiencies would occur after a single dry year and in multiple year drought conditions. Table IV.N-6 compares current supply and future demands in normal, single dry and multiple dry years, without the Project. Table IV.N.6 illustrates that shortfalls in supply would occur if MCWD were to continue to utilize existing water supplies to meet demands at build-out of the community without the Project. Deficiencies of over 1,000 af would occur in a single dry year without the Project.

²⁰ MCWD, 2005 Urban Water Management Plan, website:
<http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 4, 2006.

**Table IV.N-6
Current Supply and Demand Without Project⁽¹⁾**

Current Supply			Multiple Dry Water Years			
	Average Normal Water Year	Single Dry Water Year	Year 1	Year 2	Year 3	Year 4
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Demand Total (without Project)	4,858	4,858	4,858	4,858	4,858	4,858
Difference (without Project)	1,902	-1,448	332	50	-350	-366
<i>Note:</i> (1) Units of measure are acre-feet (af) per year. An af equals approximately 325,821 gallons. Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 11, Page 18, March 25, 2008.						

Additional Sources of Water

California Water Code 10911 requires that if, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the city or county its plans for acquiring additional water supplies. Since existing supplies are insufficient and result in a shortfall in single dry years, MCWD has developed the following plans regarding implementation of water conservation measures, use of recycled water, and development of new supplies.

Future Groundwater

MCWD has identified groundwater as being a significant source of future water supplies for the community. Groundwater would be extracted from either the Mammoth Basin watershed or the Dry Creek Basin watershed to the north of the Mammoth Basin, with the Mammoth Basin as the current priority project for future well development. Additional groundwater production wells in the Mammoth Basin would require environmental review and hydrogeologic analysis to ensure that additional volumes of water can be safely extracted. Well development in the Dry Creek Basin would also require environmental review and hydrogeologic analysis prior to utilizing this water source. Overall, depending upon supplies needed, about 1,000 af of additional groundwater supplies may be developed in the future from either the Mammoth Basin watershed or the Dry Creek watershed.

As shown in the Project WSA, although groundwater supplies are supplemented with surface water and MCWD may be supplementing existing well supplies with additional production wells in the future, the volume of groundwater currently available from existing wells is insufficient to meet the total demand under multiple dry-year conditions as the community nears build-out in 2025. A study conducted for MCWD indicated that a total volume of 3,800 afy could be pumped from the Mammoth Basin during a three-year dry period.²¹

²¹ Wildermuth Environmental, Inc., "Investigation of Groundwater Production Impacts on Surface Water Discharge and Spring Flow", November 2003.

Future Recycled Water

MCWD currently supplies untreated groundwater for irrigation of the existing nine-hole Snowcreek Golf Course and the Sierra Star Golf Course, and supplies potable water to Shady Rest Park. The volume of groundwater supplied to the Sierra Star Golf Course over the past eight years (2000 to 2007) has averaged 242 afy. The volume of groundwater supplied to the Snowcreek Golf Course over the past eight years has averaged 93 afy. Water supplied to Shady Rest Park over the past five years averaged about 30 afy. The maximum water supplied to these locations in dry water years has totaled about 440 af.

The Recycled Water Project plans for providing recycled water to both golf courses and, at some point in the future, Shady Rest Park. Recycled water use at Shady Rest Park and Sierra Star Golf Course would result in a direct offset of potable water. Recycled water provided to the Snowcreek Golf Course would be provided to a portion of the existing nine holes and possibly the entire additional nine holes planned for development. Recycled water provided to the additional nine holes planned at the Snowcreek Golf Course would not offset any current demands for potable water. Overall, it is anticipated that the amount of potable water that could be made available through the implementation of this project is about 400 acre-feet annually. However, depending upon customer demands, the recycled water project could potentially supply about 550 af annually to large turf irrigators in the community during the summer irrigation season.

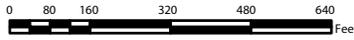
In August 2007, representatives from Sierra Star Golf Course signed an agreement with the District committing to purchase recycled water for golf course irrigation for the next 30 years.

Future Conservation

During the summer of 2007, the Board of Directors implemented a revised set of water restrictions, which may be utilized during times of drought or water shortage. These restrictions were implemented during the months of August and September and resulted in average demand reductions of 15 percent. Projections of available water supply are prepared each year after final snowpack measurements are made on April 1st. At that time, if projections indicate possible water supply insufficiencies, MCWD's Board of Directors may declare the existence or threatened existence of a drought and may then implement any level of restrictions as deemed necessary. At build-out of the Town, under the General Plan Update Draft EIR, the projected savings from implementation of water conservation measures amounts to about 500 afy.



Mammoth Community Water District
 Mammoth Area Geographic Information Center
 P.O. Box 597
 Mammoth Lakes, CA 93546
 (760) 934-2596
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Map Legend

- Existing Water Line Main
- Existing Water Line Lateral
- Mammoth Crossing Site
- DIP - Ductile Iron Pipe
- STL - Steel Pipe
- COP - Copper Pipe
- GAL - Galvanized Pipe



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 Environmental Planning and Research



Figure IV.N-2
 Existing Water Lines

Future Water System Loss Reduction

MCWD has been implementing an aggressive main water pipeline replacement program to replace old leaking water pipes since 2001. Over the past several years, an average of 10,000 feet of pipeline per year has been replaced. It is estimated that replacement of all of the existing old pipelines in the entire system will occur over the next eight-year period. MCWD water line staff will be focusing their efforts on installing the recycled water pipelines over the next two years with lesser amounts of water lines being replaced during this timeframe. Once the recycled water pipelines are installed, approximately 10,000 feet of water pipeline per year will be replaced. As a result of the completion of this replacement work, MCWD hopes to achieve a reduction in water loss within the system of approximately 300 af.

Table IV.N-7 summarizes the new sources of water potentially available to assist in resolving water supply deficiencies.

**Table IV.N-7
Future Water Supplies**

Project Name	Demand Reduction	Supply Increase	Projected Completion Date
New groundwater development		1,000 af ⁽¹⁾	As needed
Recycled Water Project		400 af	2010 ⁽²⁾ (depends upon customer commitments)
Water Conservation with irrigation restriction enforced	500 af ⁽³⁾		n/a
Water Pipeline Replacement to Reduce Water Loss	300 af ⁽⁴⁾		Ongoing; full implementation anticipated by 2011
Total	800 afy	1,400 afy	
<i>Notes:</i> (1) 1,000 af or amount needed to meet demands. (2) 2010 date depends upon customer commitments. (3) 500 af is at Town build-out with irrigation restriction enforced. (4) 10-15% loss rate goal is about 300 af demand reduction is at Town build-out.			
<i>Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 13, page 24, March 25, 2008.</i>			

Table IV.N-8 provides a breakdown of existing water supplies for surface and ground water, plus recycled water and water from future wells.

**Table IV.N-8
Existing Water Supply Reliability Plus Recycled Water Use and Future Wells⁽¹⁾**

Supply	Normal Water Year	Single Dry Water Year	Multiple Dry Years			
			Year 1	Year 2	Year 3	Year 4
Projected Surface Water	2,760 ⁽²⁾	0	1,780	1,500	1,100	1,084
Projected Groundwater Wells	4,000 ⁽³⁾	3,410	3,410	3,408	3,408	3,408
Future Groundwater	1,000	1,000	1,000	1,000	1,000	1,000
Future Recycled Water	360	360	360	360	360	360
Projected Total Supply	8,120	4,770	6,550	6,268	5,868	5,852

Notes:

(1) Units of measure are acre-feet (af) per year. An af equals approximately 325,829 gallons.

(2) Total MCWD is "entitled" to.

(3) 4,000 afy is the total MCWD has a "right" to.

(4) While MCWD currently has surface water rights that total a maximum of 2,760 af annually, the bypass flow requirements that MCWD operates under have not been permanently established and the final bypass requirements that are eventually established could potentially result in less surface water being available to MCWD. In addition, the volume of groundwater noted in this table is the maximum amount of groundwater that MCWD has projected to pump in any given year and does not necessarily represent the safe yield of the aquifer.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 3, page 8, and Table 12, page 19, page 21 and 23, March 25, 2008.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant effects; or
- (b) have insufficient water supplies available to serve the project from existing entitlements and resources, or would require new or expanded entitlements.

Project Impacts and Mitigation Measures

Impact UTIL-5 Water Treatment Facilities

In 2004, MCWD completed modifications to the Lake Mary surface Water Treatment Plant ("Plant") to meet new standards of the California Department of Health Services. As a result of these modifications, the production capacity of the Plant is now rated at the 5 cfs diversion rate allowed for in the water rights permit. These improvements have enabled MCWD to utilize the full 2,760 af of water available from its

state water right permits in normal and wet precipitation conditions.²² As such, the increased demand for water services generated by the Project would not result in the need for a new or expanded water treatment facility to be constructed. Therefore, impacts would be *less than significant* and no mitigation measures are required.

Impact UTIL-6 Water Supply

Development of the proposed Project, as described above, would result in an increased demand for domestic water in the Town. Table IV.N-9 represents the water generation rates analyzed for average day and peak day flows. For the purposes of the Project WSA, the residential uses were split into hotel uses and condominium uses. The proposed 48 condominium rooms were converted into 24 two-bedroom condominium units to coincide with MCWD's meter record data. The Project description states that 742 condo-hotel rooms will be constructed. For the purposes of the Project WSA, all condo-hotel rooms were counted as hotel rooms and were assumed separate units for a worst-case scenario assessment of the potential Project impacts. The commercial/amenity space, pool/spa, conference center, restaurant, and general commercial uses were split out of the total square footage. The remainder of the commercial/amenity areas has been considered non-water usage since they are wrapped up into typical condominium and hotel demand estimates.

**Table IV.N-9
Project Estimated Water Demands**

	Size	Average Daily Generation Rate	Total Average Gallons Per Day (GPD)	Peak Daily Generation Rate*	Total Peak Gallons Per Day (GPD)
Residential Uses	Rooms/du				
Hotel Rooms ⁽¹⁾	760	80 gpd/room	60,800	120 gpd/unit	91,200
Condominiums ⁽²⁾	24	100 gpd/unit	2,400	105 gpd/unit	2,520
Non Residential Uses by Area	Square Feet (sf)				
Pool/Spa	4,500	435 gpd/1,000 sf	1,958	910 gpd/1,000 sf	4,095
Conference Center	9,000	125 gpd/1,000 sf	1,125	230 gpd/1,000 sf	2,070
Restaurant/Bar Area	22,125	580 gpd/1,000 sf	12,833	685 gpd/1,000 sf	15,156
General Commercial ⁽³⁾	13,492	150 gpd/1,000 sf	2,024	280 gpd/1,000 sf	3,778
Total Water Demands			81,140		118,819
<i>Notes:</i>					
(1) 760 rooms are counted as one-bedrooms of which 66 are on-site affordable housing.					
(2) 24 two-bedroom, permanent year-round, on-site housing is equivalent to 48 bedrooms.					
(3) General Commercial includes water use associated with the potential office and personal services (e.g., beauty salons, childcare facilities, real estate sales and reservations, etc.).					
(4) 76,453 square feet of the Project is considered non-water usage area. This area is calculated at 85% of the total area of hotel amenities and operations less the listed specific uses (i.e., pool/spa, conference, restaurant/bar).					
Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 1, page 6, March 25, 2008.					

²² MCWD, 2005 Urban Water Management Plan, website:
<http://www.mcwd.dst.ca.us/ProjectsReports/UWMP/UWMP2005.pdf>, CAJA staff, March 4, 2006.

Based on the methodology described above, as indicated in Table IV.N-9, the Project's estimated average water demand is approximately 81,140 gpd (91 afy) and the peak water demand is approximately 118,819 gpd (134 afy).²³ According to the existing water supply available to the MCWD (refer to Table IV.N-3 above) there is sufficient water supply at average and peak times in both normal and multiple dry years for the Project. Thus, Project impacts to water use within the Town would be considered *less than significant* and no mitigation measures are required.

Because the Project would not result in any significant impacts related to water service, no mitigation measures are required. However, the following measure is recommended:

Mitigation Measure UTIL-6 Water Supply

To further reduce the Project's demand on water services, the Project Applicant should:

- a. Ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets;
- b. Install either drip irrigation or a "smart sprinkler" system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property;
- c. Select and use drought-tolerant, low-water consuming plant varieties and little or no use of turf in the landscape design to reduce irrigation water consumption;
- d. Install high efficiency water fixtures such as low flush and dual flush water toilets and urinals, and shall limit the number of showerheads to one very low flow fixture per stall, in new construction. Low-flow faucet aerators should be installed on all sink faucets; and
- e. Install Energy Star high efficiency dishwashers and clothes washers.

Impact UTIL-7 Water Infrastructure

The Project includes installation of water infrastructure within the Project site to convey water from the existing MCWD water lines to usage points within the Project area. However, design plans for this internal Project water supply distribution system are not complete at this time. Figure IV.N-2, shown previously, illustrates the existing water infrastructure that serves the Project area. According to MCWD, the existing design of the water distribution system is sufficient to handle the current demands. The

²³ The Project WSA did not calculate peak water use. The generation rates as shown in Table IV.N-9 are based on estimates provided by MCWD.

distribution system surrounding the Project area consists of 12 inch ductile iron pipe (“DIP”) on Lake Mary Road and Minaret Road to the south and 10 inch DIP on Canyon Blvd and Minaret Road to the north. System pressures in the Project area range from 50 to 150 pounds per square inch (“PSI”). The applicant would be responsible for all costs associated with the installation of water infrastructure on the Project site and the connection fees paid to MCWD for the Project would help to pay for the necessary upgrades to the MCWD’s water pipelines as needed. In consideration of the above, Project impacts related to water infrastructure would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact UTIL-8 Cumulative Water Supply

Implementation of the Project in combination with the related projects in Table II-1 would further increase demands on water supply. The projects listed in the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall water supply through the project approval process, and would consider project approvals in the light of existing and projected water supplies of the Town. Therefore the cumulative water generation is likely overstated.

With respect to the Town’s overall water supply condition, the water supply requirements for any project that is consistent with the Town’s General Plan Update Draft EIR have been taken into account in the planned growth of the water system in the 2005 UWMP. According to the Town, all of the related projects are generally consistent with their respective land use designations. The MCWD has developed an expected total water demand for the Town of 4,898 afy at Town buildout utilizing the unit counts projected in the Town of Mammoth Lakes General Plan Update Draft EIR (October 2005), including the related projects as presented in Section II, Environmental Setting, Table II-1, Related Projects, and Table IV.N-2 above. As discussed previously and illustrated in Table IV.N-6, there would be insufficient supplies of water during dry years at Town buildout without the Project. Consequently, as shown in Table IV.N-10, there would also be insufficient water for the Project plus the related projects during dry water years. Deficiencies of over 1,000 af would occur in a single dry year, which is considered the lowest historical runoff for the watershed. Thus, impacts of the Project together with the related projects on overall MCWD water supply during single and multiple dry year scenarios would be *significant*.

Table IV.N-10
Existing Water Supply
Comparison of Current Supply and Demand With Project Plus Related Projects⁽¹⁾

Current Supply	Multiple Dry Water Years					
	Average/ Normal Water Year	Single Dry Water Year	Year 1	Year 2	Year 3	Year 4
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Cumulative Demand Total	4,963	4,963	4,963	4,963	4,963	4,963
Difference	1,797	1,553	227	-55	-455	-471

Note:
(1) Units of measure are acre-feet (af) per year. An af equals approximately 325,821 gallons.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 11, Page 18, March 25, 2008.

As stated previously, MCWD is working to develop new groundwater sources, use recycled water, and implement water restrictions as a means to increase supplies to resolve any potential water supply deficiencies during drought periods. However, even with full implementation of these various water supply projects, it is expected that insufficient water would be available to meet projected demand during a single dry year (refer to Table IV.N-11 below).

Table IV.N-11
2025 Future Water Sources
Comparison of Supply and Demand With Project Plus Related Projects⁽¹⁾

2025 Supply	Multiple Dry Water Years					
	Average/ Normal Water Year	Single Dry Water Year	Year 1	Year 2	Year 3	Year 4
Supply Totals	8,120	4,770	6,550	6,268	5,868	5,852
Cumulative Demand Totals	4,963	4,963	4,963	4,963	4,963	4,963
Difference	3,157	-193	1,587	1,305	905	889

Notes:
(1) Units of measure are acre-feet (af) per year.
(2) The supply totals on this table assume 1,000 af of future groundwater well water and 360 af of recycled water would be utilized in normal water years.

Source: MCWD SB 610 WSA for the Mammoth Crossing Project, Table 12, Page 19, March 25, 2008.

In compliance with General Plan Policy R.4.A, the Town shall work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established prior to development approvals. Therefore, because these future water sources do not exist at present the Project's contribution to overall water supply demand within the Town would be cumulatively considerable, and cumulative water supply impacts would be **significant**. There are no mitigation measures available to reduce this impact.

Impact UTIL-9 Cumulative Water Infrastructure

The potential need for the related projects to require upgraded water lines to accommodate their water demands requires site-specific evaluation and there is little, if any, cumulative relationship between the development of the Project and the related projects. As stated previously, all of the related projects are generally consistent with their respective land use designations. Therefore, the capacity of the main water lines serving the projects would be considered adequate, because the infrastructure was designed to accommodate planned development in the Town. In addition, the connection fees paid by individual applicants would help to pay for the necessary upgrades to the water lines described above. In consideration of the above, cumulative impacts related to water infrastructure would be ***less than significant*** and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to water supply and water conveyance infrastructure would be ***less than significant*** and although implementation of the recommended Mitigation Measure UTIL-6 Water Supply listed above would reduce the Project's contribution to overall cumulative impacts, the cumulative impacts to water supply would remain ***significant and unavoidable***.

At this time, the specifics of system-wide improvements needed to provide adequate water supplies to meet cumulative water demand during single and multiple dry year scenarios are unknown since the Final EIR for the Mammoth Creek Project that will specify water amounts available to MCWD has not been certified. In addition, new or expanded groundwater production wells in the Mammoth Basin would require environmental review and hydrogeologic analysis to ensure that additional volumes of water can be safely extracted. Well development in the Dry Creek Basin would also require environmental review and hydrogeologic analysis. Until these analyses are complete and specific projects have been approved to supplement MCWD's existing water supply, cumulative water supply impacts associated with the Project and related projects would remain ***significant and unavoidable***.

3. ELECTRICITY

ENVIRONMENTAL SETTING

Southern California Edison (“SCE”) provides electricity service to the Town. Overhead and underground facilities with varying voltages are located throughout the Town’s Planning Area.^{24, 25} SCE is currently able to supply enough electricity to accommodate the needs of the region at build-out of the existing General Plan.²⁶

SCE provides service to 12 million people within its 50,000-square-mile service area within Central, Coastal, and Southern California.²⁷ SCE utilizes various types of energy to produce electricity. These resources include natural gas, a fossil fuel; falling water in hydroelectric plants; nuclear energy and renewable resources, such as solar and wind.²⁸ Currently, nearly 17 percent of SCE’s energy mix comes from wind, solar, biomass, small hydropower and geothermal sources. SCE is working toward a goal of having at least 20 percent of its energy delivered from renewable sources.²⁹

REGULATORY SETTING

*Federal Energy Regulatory Commission*³⁰

The Federal Energy Regulatory Commission (“FERC”) is an independent agency that regulates the interstate transmission of natural gas, oil, and electricity. Additionally, FERC is responsible for licensing hydropower projects. In regards to electricity, FERC:

- Regulates the transmission and wholesale sales of electricity in interstate commerce;

²⁴ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-268, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.*

²⁵ *The Town’s Planning Area encompasses all land within the Town’s Municipal Boundary, portions of land within unincorporated Mono County, certain lands owned by the City of Los Angeles, and other public and private entities.*

(Source: Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 2.0 – Executive Summary, page 2-2, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.)

²⁶ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-268, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.*

²⁷ *Southern California Edison, Company Overview, Southern California Edison Territory Map, website: <http://www.sce.com/AboutSCE/CompanyOverview/territorymap.htm>, July 1, 2008.*

²⁸ *Southern California Edison, Power & Our Environment, Power Generation, Power Production, website: <http://www.sce.com/PowerandEnvironment/PowerGeneration/PowerProduction/>, July 1, 2008.*

²⁹ *Southern California Edison, Power & Our Environment, Renewable Energy, website: <http://www.sce.com/PowerandEnvironment/renewables/>, July 1, 2008.*

³⁰ *Federal Energy Regulatory Commission, About FERC, What FERC Does, website: <http://www.ferc.gov/about/ferc-does.asp>, July 1, 2008).*

- Licenses and inspects private, municipal, and state hydroelectric projects;
- Ensures the reliability of high voltage interstate transmission system;
- Monitors and investigates energy markets;
- Uses civil penalties and other means against energy organizations and individuals who violate FERC rules in the energy markets;
- Oversees environmental matters related to hydroelectricity projects and major electricity policy initiatives; and
- Administers accounting and financial reporting regulations and conduct of regulated companies.

Areas outside of FERC's responsibility are dealt with by the California Public Utility Commission ("CPUC"). In regards to electricity, FERC is not responsible for:

- Regulation of retail electricity sales to consumers;
- Approval for the physical construction of electric generation, transmission, or distribution facilities;
- Regulation of activities of the municipal power systems, federal power marketing agencies like the Tennessee Valley Authority, and most rural electric cooperatives; and the
- Regulation of nuclear power plants by the Nuclear Regulatory Commission.

Additionally, as previously discussed, FERC is required by the Government Performance and Results Act of 1993 ("GRPA") to develop and maintain strategic goals, to link work and resources to performance, and to monitor and report on the results to Congress and the public at large. Congress passed GPRA to increase the effectiveness and accountability of government operations and administration and to improve Congressional decision-making.

California Public Utilities Commission

California Public Utilities Commission ("CPUC") Decision 95-08-038 contains the rules for the planning and construction of new transmission facilities, distribution facilities, and substations. The decision requires permits for the construction of certain power line facilities or substations if the voltages would exceed 50 kilovolts ("kV") or if the substation would require the acquisition of land or an increase in voltage rating above 50 kV. Distribution lines and substations with voltages less than 50 kV do not need to comply with this decision; however, the utility must obtain any nondiscretionary local permits required for the construction and operation of these projects. CEQA compliance is required for construction of facilities constructed in accordance with the decision.

California Energy Commission

Title 24 of the California Administrative Code

Title 24 of the California Administrative Code establishes the Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically by the California Energy Commission to allow consideration and possible incorporation of new energy efficiency technologies and methods. Revised Title 24 standards became effective October 1, 2005. The updated 2008 standards are currently being developed.³¹

The energy efficiency standards regulate building energy consumption for heating, cooling, ventilation, water heating, and lighting. Title 24 may be met in one of two ways: by meeting performance criteria (measured in British thermal units (“BTU”) per square foot per year) or by installing a prescriptive list of energy conservation measures. Title 24 is enforced through the local building permit process.³²

*Existing Renewables Facilities Program*³³

In order to help attain the California Renewable Portfolio Standard's (“RPS”) goal of 20 percent of retail electricity generated from renewables by 2010, the California Energy Commission has developed and currently administers renewable energy incentive programs. The goal of these programs is to establish a competitive, self-sustaining renewable energy supply for California while increasing the near-term quantity of renewable energy generated in-state. The Existing Renewable Facilities Program (“ERFP”) is one of several program elements within the Energy Commission's Renewable Energy Program.

The purpose of the ERFP is to allocate state funds to increase the competitiveness of existing (operational on or prior to September 26, 1996) in-state renewable generating facilities. For the purpose of the ERFP, self-sustainability refers to the ability of these facilities to continue operation without public funding by no later than December 31, 2011. The ERFP aims also to secure the environmental, economic and reliability benefits these facilities provide.

The Electric Utility Industry Restructuring Act

The Electric Utility Industry Restructuring Act (also known as “AB 1890”) requires California utilities to fund Public Benefit Programs through 2011. Under the program, publicly-owned utilities are required to spend 2.85 percent of utility revenues on Public Benefit Programs. While there is wide flexibility

³¹ *The California Energy Commission, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations, website: <http://www.energy.ca.gov/title24/>, July 1, 2008 (Accessed July 2, 2008).*

³² *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-272, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.*

³³ *The California Energy Commission, Existing Renewables Facilities Program, June 17, 2008, website: http://www.energy.ca.gov/renewables/existing_renewables/index.html, July 2, 2008.*

regarding the planning and implementation of such programs, expenditures must fall under one or more of four categories: (1) cost-effective demand-side management services to promote energy efficiency and energy conservation; (2) new investments in renewable energy technology; (3) research, development and demonstration; and (4) services provided for low-income electricity customers. The amount publicly-owned utilities must collect is tied to the lowest percentage of expenditures of the State's three investor-owned utilities. The expenditure of those funds is entirely the discretion of locally-elected governing bodies so long as the expenditures fit within one or more of the four categories.

Town of Mammoth Lakes General Plan 2007

The Resource Management and Conservation Element of the *Town of Mammoth Lakes General Plan 2007* ("General Plan") includes goals and policies related to energy resources, green technology and energy conservation. Specifically, these goals and policies seek to expand the efficient use of energy, increase the use of renewable energy sources, and encourage the conservation of existing sources of energy. A consistency analysis with these policies is included in Table IV.I-2, Comparison of Project Characteristics to Applicable Policies in the General Plan, in Section IV.I, Land Use and Planning, of this Draft EIR.

North Village Specific Plan 2000

The Public Facilities Element and Conservation and Open Space Element of the *North Village Specific Plan 2000* ("Specific Plan") include objectives, policies, and standards related to the development and expansion of utilities systems and the conservation of energy resources within the Specific Plan area. A consistency analysis with these policies and standards is included in Table IV.I-3, Comparison of Project Characteristics to Applicable Policies in the Specific Plan, in Section IV.I, Land Use and Planning, of this Draft EIR.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix F of the State CEQA Guidelines

In accordance with Appendix F to the State *CEQA Guidelines*, CEQA "requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." As no specific thresholds of significance for potential energy impacts are suggested in the State *CEQA Guidelines* or have been adopted by the Town, the applicable thresholds of significance are derived from the City of Los Angeles *CEQA Thresholds Guide*, as described below.

City of Los Angeles CEQA Thresholds Guide

Based upon criteria established in the City of Los Angeles *CEQA Thresholds Guide*, whether the proposed Project would have a significant impact on electricity is determined on a case-by-case basis, considering the following factors:

- (a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- (b) Whether and when the needed infrastructure was anticipated by adopted plans; and
- (c) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Project Impacts and Mitigation Measures

Impact UTIL-10 Electricity Supply Facilities and Distribution Infrastructure

Development of the proposed Project, as discussed above, would result in a more intense use of the Project site and an increased demand for electricity within the Town. Southern California Edison (“SCE”) has previously stated that it currently has the capacity to supply the electricity needs of the region and anticipates being able to continue its service upon implementation of the 2005 comprehensive update of the Town’s General Plan.³⁴ However, the proposed Project was only partially accounted for in the Town’s General Plan update which calculated density as currently permitted in the Specific Plan at 48 rooms per acre (“RPA”). The Project would increase the allowable density from what is currently permitted by the Specific Plan, therefore increasing the overall demand for electricity. As a result, changes have been made in the estimated future demands for the community based upon the increased density proposed for the Project. As discussed in Section IV.K, Population and Housing of this Draft EIR, Persons at One Time (“PAOT”) is used as the Town’s threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. At General Plan build-out, which including the proposed Project, PAOT was forecasted to reach 60,700, which was determined to have a less-than-significant impact on electrical service within the Town.³⁵ Additionally, the Project would include energy conservation and efficiency measures to reduce the Project’s demand on electrical services, as required by the 2005 General Plan and Specific Plan. Therefore, Project impacts associated with electricity supply facilities and distribution infrastructure would be ***less than significant*** and no mitigation measures are required.

³⁴ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-268, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

³⁵ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-291, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

CUMULATIVE IMPACTS

Impact UTIL-11 Cumulative Electricity Supply Facilities and Distribution Infrastructure

Implementation of the Project in combination with the development of the 40 related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would further increase demands on electricity. The projects listed in the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall electricity demand through the project approval process, and would consider project approvals in the light of existing and projected electricity demand and the remaining capacity of electricity supply facilities and distribution infrastructure. Therefore the cumulative electricity demand is likely overstated. As previously discussed, SCE has previously stated that it currently has the capacity to supply the electricity needs of the region and anticipates being able to continue its service upon implementation of the 2005 comprehensive update of the Town's General Plan.³⁶ However, as discussed above, the Project was only partially accounted for in the Town's General Plan update. The Project would increase the allowable density from what is currently permitted by the Specific Plan; however, density was calculated at what is currently permitted in the Specific Plan (48 rooms per acre ["RPA"]). Changes have been made in the estimated future demands for the community based upon the increased density proposed for the Project. It is anticipated that electrical services would be available to serve the projected population and demand that would occur at General Plan build-out. As discussed under Impact UTIL-10, the Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report determined that electrical service could be accommodated by SCE's existing infrastructure upon build-out of the General Plan. At General Plan build-out, which including the proposed Project, PAOT was forecasted to reach 60,700, which was determined to have a less-than-significant impact on electrical service within the Town. In addition, the proposed Project and related projects would be required to include energy conservation and efficiency measures to reduce demands on electrical services, as required by the General Plan and Specific Plan.

Therefore, cumulative impacts related to electricity supply facilities and distribution infrastructure would be *less than significant* and no mitigation measures are required.

MITIGATION MEASURES

Because the Project would not result in significant impacts on electricity services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to electricity services would be *less than significant*.

³⁶ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-268, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

4. PROPANE

ENVIRONMENTAL SETTING

Propane, a byproduct of the oil refining process, is the most common form of liquefied petroleum gas (“LPG”) that is used in areas where no natural gas distribution systems are available. The Town utilizes propane as an energy source, commonly to fuel furnaces, water heaters, and stoves. Propane is an approved alternative clean fuel under the Clean Air Act Amendments of 1990 and the Energy Policy Act of 1992, emitting minimal sulfur oxides and ultra-low emissions of particulates, carbon monoxide, and volatile organic compounds.³⁷

Currently, two private companies, Amerigas and Turner Gas, supply the Town with propane. The Town currently has an agreement with Rock Creek Energy LLP which grants the right, privilege, and franchise to lay and use pipes and appurtenances for transmitting and distributing propane within the Town. As a result of this agreement, two underground pipelines were installed from the Industrial Park to the Village in the Town’s right-of-way. The pipelines can be used for propane or liquefied natural gas. One pipeline is currently distributes propane to portions of the community, while the other pipeline is currently not in use. These pipelines are available to anyone living in the vicinity and may also be extended. Under the franchise agreement any fuel provider can utilize the pipelines.³⁸

REGULATORY SETTING

United States Department of Labor - Occupational Safety & Health Administration

The United States’ Department of Labor’s Occupational Safety & Health Administration (“OSHA”) requires that an Emergency Action Plan (“EAP”) be developed if fire extinguishers are required or provided in the workplace, and if anyone will be evacuating during a fire or other emergency.³⁹ An EAP is a written document required by particular OSHA standards [29 CFR 1910.38(a)]. The purpose of an EAP is to facilitate and organize employer and employee actions during workplace emergencies. Well-developed emergency plans and proper employee training (such that employees understand their roles and responsibilities within the plan) will result in fewer and less severe employee injuries and less structural

³⁷ Propane Education and Research Council, *General Benefits, Environmental*, website: <http://www.propanecouncil.org/genBenefits/environmental.htm>, July 2, 2008.

³⁸ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-268, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

³⁹ U.S. Department of Labor, *Occupational Safety & Health Administration, Evacuation Plans and Procedures, Do I Need an Emergency Action Plan?*, website: <http://www.osha.gov/SLTC/etools/evacuation/need.html>, July 2, 2008.

damage to the facility during emergencies. A poorly prepared plan, likely will lead to a disorganized evacuation or emergency response, resulting in confusion, injury, and property damage.⁴⁰

United States Department of Transportation - Federal Motor Carrier Safety Administration

Under the Code of Federal Regulations, the United States Department of Transportation's ("DOT") Federal Motor Carrier Safety Administration ("FMCSA") oversees and regulates the transport of hazardous materials, performs vehicle inspections, and provides specifications for the propane cylinders. DOT requires employers to provide training within the first 90 days of employment for any employees that handle and/or transport hazardous materials, and recurrent training at least once every three years.⁴¹

California Energy Commission

Title 24 of the California Administrative Code

Title 24 of the California Administrative Code establishes the Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically by the California Energy Commission to allow consideration and possible incorporation of new energy efficiency technologies and methods. Revised Title 24 standards became effective October 1, 2005. The updated 2008 standards are currently being developed.⁴²

The energy-efficiency standards regulate building energy consumption for heating, cooling, ventilation, water heating, and lighting. Title 24 may be met in one of two ways: by meeting performance criteria (measured in British thermal units ("BTU") per square foot per year) or by installing a prescriptive list of energy conservation measures. Title 24 is enforced through the local building permit process.⁴³

Town of Mammoth Lakes General Plan 2007

The Resource Management and Conservation Element of the *Town of Mammoth Lakes General Plan 2007* ("General Plan") includes goals and policies related to energy resources, green technology and energy conservation. Specifically, these goals and policies seek to expand the efficient use of energy, increase the use of renewable energy sources, and encourage the conservation of existing sources of

⁴⁰ U.S. Department of Labor, Occupational Safety & Health Administration, *Evacuation Plans and Procedures, What is an Emergency Action Plan?*, website: <http://www.osha.gov/SLTC/etools/evacuation/eap.html>, July 2, 2008.

⁴¹ Propane Education and Research Council, *About the Council, Mission Areas, Safety & Training*, website: <http://www.propanecouncil.org/about/compliance.htm>, July 2, 2008.

⁴² The California Energy Commission, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations*, website: <http://www.energy.ca.gov/title24/>, July 1, 2008 (Accessed July 2, 2008).

⁴³ *Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-272*, website: <http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

energy. A consistency analysis with these policies is included in Table IV.I-2, Comparison of Project Characteristics to Applicable Policies in the General Plan, in Section IV.I, Land Use and Planning, of this Draft EIR.

North Village Specific Plan 2000

The Public Facilities Element and Conservation and Open Space Element of the *North Village Specific Plan 2000* (“Specific Plan”) include objectives, policies, and standards related to the development and expansion of utilities systems and the conservation of energy resources within the Specific Plan area. A consistency analysis with these policies and standards is included in Table IV.I-2, Comparison of Project Characteristics to Applicable Policies in the Specific Plan, in Section IV.I, Land Use and Planning, of this Draft EIR.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G and F of the State CEQA Guidelines

In accordance with Appendix F to the *CEQA Guidelines*, CEQA “requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.” As no specific thresholds of significance for potential energy impacts are suggested in Appendix G or F of the *CEQA Guidelines* or have been adopted by the Town, the applicable thresholds of significance are derived from the City of Los Angeles *CEQA Thresholds Guide*, as described below.

City of Los Angeles CEQA Thresholds Guide

Based upon criteria established in the City of Los Angeles *CEQA Thresholds Guide*, whether the proposed Project would have a significant impact on propane is determined on a case-by-case basis, considering the following factors:

- (a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- (b) Whether and when the needed infrastructure was anticipated by adopted plans; and
- (c) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Project Impacts and Mitigation Measures

Impact UTIL-12 Propane Supply Facilities and Distribution Infrastructure

Development of the proposed Project, as discussed above, would result in a more intense use of the Project site and an increased demand for propane within the Town. It was previously estimated that propane services would not be anticipated to be significantly impacted with implementation of the updated General Plan. Additionally, the propane infrastructure was designed for expansion to accommodate the population growth anticipated under the General Plan.⁴⁴ However, as previously discussed, the proposed Project was only partially accounted for in the Town's General Plan update which calculated density as currently permitted in the Specific Plan at 48 rooms per acre ("RPA"). The Project would increase the allowable density from what is currently permitted by the Specific Plan, therefore increasing the overall demand for electricity. As a result, changes have been made in the estimated future demands for the community based upon the increased density proposed for the Project. As discussed in Section IV.K, Population and Housing of this Draft EIR, Persons at One Time ("PAOT") is used as the Town's threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. At General Plan build-out, which including the proposed Project, PAOT was forecasted to reach 60,700, which was determined to have a less-than-significant impact on propane service within the Town.⁴⁵ Additionally, the Project would include energy conservation and efficiency measures to reduce the Project's demand on propane services, as required by the General Plan and Specific Plan. Therefore, Project impacts associated with propane supply facilities and distribution infrastructure would be *less than significant* and no mitigation measures are required.

CUMULATIVE IMPACTS

Impact UTIL-13 Cumulative Propane Supply Facilities and Distribution Infrastructure

Implementation of the Project in combination with the development of the 40 related projects listed in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR would further increase demands on propane. The projects listed in the related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The Town would monitor the overall propane demand through the project approval process, and would consider project approvals in the light of existing and projected propane demand and the remaining capacity of current supply facilities and distribution infrastructure. Therefore the cumulative propane demand is likely overstated. As previously discussed, the Town's propane infrastructure is currently able to serve the Town and was anticipated to have the capacity to serve all projects at General Plan build out, due to the system's ability to expand. However, as discussed above, the Project was only partially

⁴⁴ Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report, May 2007, Section 4.11 – Public Utilities, page 4-293, website:
<http://www.ci.mammothlakes.ca.us/General%20Plan/GP%20FPEIR/index.htm>, July 2, 2008.

⁴⁵ *Ibid.*

accounted for in the Town's General Plan update. The Project would increase the allowable density from what is currently permitted by the Specific Plan; however, density was calculated at what is currently permitted in the Specific Plan (48 rooms per acre ["RPA"]). Changes have been made in the estimated future demands for the community based upon the increased density proposed for the Project. It is anticipated that propane services would be available to serve the projected population and demand that would occur at General Plan build-out. As under Impact UTIL-12, the Town of Mammoth Lakes 2005 General Plan Update Final Program Environmental Impact Report determined that propane service could be accommodated as the propane infrastructure was designed for expansion to accommodate the population growth anticipated under the General Plan. At General Plan build-out, which including the proposed Project, PAOT was forecasted to reach 60,700, which was determined to have a less-than-significant impact on propane service within the Town. In addition, the proposed Project and related projects would be required to include energy conservation and efficiency measures to reduce demands on electrical services, as required by the General Plan and Specific Plan. Therefore, cumulative impacts related to propane supply facilities and distribution infrastructure would be *less than significant* and no mitigation measures are required.

MITIGATION MEASURES

Because the Project would not result in significant impacts on propane services, mitigation measures are not required pursuant to State *CEQA Guidelines* Section 15126.4(a)(3).

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to propane services would be *less than significant*.

V. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State *CEQA Guidelines* requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.”

Based on the analysis contained in this EIR, implementation of the Mammoth Crossing Project (“Project”) would result in significant unavoidable environmental impacts relative to the following:

- **Aesthetics.** The Project would result in significant and unavoidable impacts to public views of scenic vistas. The Project would result in significant impacts to scenic vistas by substantially blocking public views of the Mammoth Knolls from Lake Mary Road looking east and Minaret Road looking north. In addition, the Project would result in significant and unavoidable temporary aesthetic construction impacts. During the construction period, there would be temporary construction fencing to screen most activities from surrounding uses. However, it is likely that construction vehicles and activities would still be visible. These temporary aesthetics construction impacts cannot be reduced to a less-than-significant level with implementation of mitigation measures.
- **Air Quality.** The Project would result in significant and unavoidable impacts to air quality from Project construction generated PM₁₀ emissions as well as cumulative impacts from construction generated PM₁₀ emissions. These PM₁₀ emissions that cannot be reduced to zero with the implementation of the recommended mitigation.
- **Noise.** The Project would result in significant and unavoidable impacts due to temporary construction noise. The Project is located in an urbanized setting with nearby residents as close as 25 feet. Compliance with the provisions of the Town Municipal Code and Noise Ordinance, would ensure construction activities associated with the Project would only occur within the hours permitted for construction within the Town. While the Project would comply with the construction hours of the Town Municipal Code, construction noise levels experienced by off-site residential uses in the surrounding area could exceed the maximum exterior noise level standards allowed for mobile and stationary construction equipment under the Town Noise Ordinance. In addition, due to the close proximity of proposed future developments cumulative construction noise levels could continue to exceed the Town’s maximum exterior noise standards resulting in significant and unavoidable cumulative construction noise impacts.

- **Utilities.** The Project would result in significant unavoidable cumulative impacts to water supply. Even with full implementation of various planned water supply projects, it is expected that insufficient water would be available to meet projected demand during a single dry year. Therefore, because these future water sources do not exist at present the Project's contribution to overall water supply demand within the Town would be cumulatively considerable.

Despite these significant unavoidable impacts, the Project is being proposed to allow the construction of the proposed and planned land uses, to provide these land uses in the smallest environmental footprint and with the greatest amount of open space area, to provide needed housing and employment opportunities to Town residents, and to provide recreational amenities to the Town residents and visitors.

B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECTS

Section 15126.2(d) of the State *CEQA Guidelines* requires a discussion of the ways in which a proposed action could be growth inducing. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the State *CEQA Guidelines* reads as follows:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Implementation of the proposed Project would generate an increase in both the Town's projected permanent and seasonal populations. The Project includes development of a total maximum of 742 rooms and approximately 69,150 square feet of hotel amenities and operations, and general retail uses, and 40,500 square feet of retail development. In addition, the Project would include 33 on-site, two-bedroom workforce housing units and could include up to 24 permanent year-round two bedroom condominium units. As discussed in detail in Section IV.K, Population and Housing, of this Draft EIR, implementation of the Project would increase the permanent population by 139 persons and the seasonal/visitor population by 1,388 persons, totaling 1,527 PAOT. Current population patterns in the Town indicate that households similar to those proposed by the Project are not occupied year round; therefore this is a conservative estimate. This new PAOT population would likely patronize local businesses and services in the area, fostering economic growth.

Although the Project would provide short-term employment opportunities, which would likely be filled from the local employee base and from construction specialists (e.g., crane operators, steelworkers, masons, etc.) that move from job site to job site as dictated by the demand for their skills, the permanent jobs associated with the Project's combined total of 109,650 square feet of non-residential space would serve the convenience needs of residents of the site and visitors to the Mammoth Lakes area. Because it is not expected that the nature of the jobs that would be provided by the Project would cause employees from surrounding areas to relocate their places of residence to the Project area, the Project would not result in long-term employment growth in the area. However, for a conservative analysis, as previously discussed in section IV.J, Population and Housing, of this Draft EIR, it is assumed that all 185 employees would relocate to the area, introducing 185 employee-related residents to the Town through indirect population growth due to permanent jobs. The Project is not a regionally-significant employer, and although the Project would provide employment opportunities, fostering some economic growth, most of the jobs would likely be filled by people in the local employment base, and the Project would not induce additional population growth.

The Project site is located in an area that is surrounded by residential and recreational land use developments and is served by existing roadways, utility infrastructure, and service systems. The Mammoth Community Water District provides sanitary sewer and water service to the Project site. The amount of water consumed and wastewater generated by the Project would not require or result in the construction of new treatment facilities or the expansion of existing facilities. The permitted landfill in Mono County has the capacity to accommodate the Project's solid waste disposal needs. The Project would participate in the Town's recycling and refuse collection service to the Project's three sites. The Project would not require the expansion of landfill capacity. Therefore, the Project would not foster population growth by removing an obstacle to growth.

The Project site is located in a developed, urban area with existing public services (i.e., police, fire protection, schools, parks and recreation, and snow removal). Public services to the Project site and area are currently provided by the Town of Mammoth Lakes Police Department, the Mammoth Lakes Fire Protection District, Mammoth Unified School District, the Town of Mammoth Lakes Parks and Recreation Department, the Town of Mammoth Lakes Public Works Department and Caltrans, respectively. As discussed in Section IV.K, Public Services, of this Draft EIR, the residential population generated by the Project would result in an increased demand for the public services provided by the agencies listed above. The existing level of police service provides adequate protection to the Project area. However as this and other developments come on line, additional police staffing and equipment would be required in order to maintain current levels of service, such as response times and officer safety. The Project could require new school facilities for the school district serving the Project area. However, based on Section 65996 of the California Government Code, the Project Applicant would be required to pay the established Developer Impact Fees. The payment of such fees is deemed to fully mitigate the impacts of new development on school services. The proposed recreational amenities in conjunction with the Town's current facilities and the collection of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the Project's demand for parks and recreational

services.¹ (refer to Appendix J of this Draft EIR) Therefore, the Project would not tax the existing community services facilities by requiring the construction of new public facilities that would cause significant environmental effects.

As discussed in greater detail in Section III, Project Description, and Section IV.I, Land Use and Planning, of this Draft EIR, the Project is located within the *North Village Specific Plan* (“Specific Plan”) area, and includes a series of amendments to the Specific Plan as originally adopted in 2000 and amended in 2005, as well as amendments to the *Town of Mammoth Lakes’ General Plan* (“General Plan”), which would be required to accommodate the Project’s proposed land uses.

The Specific Plan area is intended to provide a more refined description of land uses and development policies. Additionally, the Specific Plan area, while conforming to the overall development goals established in the General Plan, is oriented toward the ultimate goal of establishing the North Village as a center for year-round resort activity. The General Plan designates Sites 1, 2, and 3 as Specific Plan. Site 4 is currently within the *Lodestar Master Plan* area and designated as Resort land use.

The objectives of the Specific Plan include development of year-round uses and visitor activity to strengthen the existing winter visitor market and to improve Mammoth’s attractiveness to spring, summer, and fall resort visitors. The Specific Plan establishes architectural and landscaping guidelines to strengthen North Village’s image as a resort activity node in Mammoth Lakes. The Specific Plan is intended to create visitor services and attractions, while emphasizing pedestrian access and mobility. Parcels developed for non-lodging purposes will be oriented toward visitor commercial uses. Development densities and standards and the mix of permitted/conditional uses within each land use district will result in a variety of hotel, commercial, and residential uses. Uses include hotels and similar visitor accommodations along with supporting restaurants, retail, and services.

As previously stated, the Project requires a series of amendments to the Specific Plan as originally adopted in 2000 and amended in 2008, as well as amendments to the General Plan, which would be required to accommodate the Project’s proposed land uses. The requested amendments necessary to approve the proposed Project is not a precedent-setting action that could lead to growth, given that such actions occur often and are a regular aspect of the planning process for towns and counties. The degree to which the requested discretionary action associated with the Project would encourage or facilitate other amendments to the General Plan and Specific Plan for areas in the vicinity of the Project site to allow uses that are not consistent with the existing land use designations and zoning cannot be estimated at this time. If in the future such actions were requested, the Town would review those requests on a case-by-case basis to determine the appropriateness of the actions and whether the actions would lead to any significant environmental impacts, as is currently being done for the Project. To allow changes to the land use

¹ *Town of Mammoth Lakes Municipal Code Chapter 15.16.085 part E, CAJA staff, April 14, 2006.*

designation and zoning of any property within the Town is solely at the discretion of the Town decision-makers and is exclusive of the Project.

Additionally, the Project site and surrounding area are part of a “built environment.” Thus, if other amendments to the General Plan and Specific Plan are requested in the future for other properties in the area, the subsequent development that would occur due to approval of the changes would not necessarily be growth inducing, considering that most of the properties in the Project area are already developed with some type of use. For these reasons, the Project would not be considered growth inducing.

C. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT

Section 15126.2(c) of the State *CEQA Guidelines* states that significant irreversible environmental changes associated with a proposed project shall be discussed, including the following:

- (a) Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- (b) Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- (c) Irreversible damage that could result from environmental accidents associated with the project.

The Project site is located in an urbanized area of the Town. Development of the Project would represent a long-term commitment to a more intensive land use of the Project’s three sites. As a result, the Project would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials.

The Project would include condominiums, workforce housing, three resort and family style hotels and non-residential development in an urbanized area that is already served by an existing roadway system and utility infrastructure. Therefore, implementation of the Project would commit future generations to using the Project site for similar uses. With the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in residential and retail/commercial settings, the Project would not involve the routine use, transport, or disposal of hazardous materials. Also, during Project construction the Project Applicant would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. No significant environmental (contamination) issues are known to occur at the site, however given past land uses of the site it is not expected that any contamination has occurred. This is discussed in detail in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR. Therefore, the Project would not result in irreversible damage that could result from environmental accidents associated with the Project.

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VI. ALTERNATIVES TO THE PROPOSED PROJECT

INTRODUCTION

The State *CEQA Guidelines* require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the Project while still meeting the general Project objectives. The State *CEQA Guidelines* also set forth the intent and extent of the alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Section 15126.6(a) of the State *CEQA Guidelines* states: “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

Purpose

Section 15126.6(b) of the State *CEQA Guidelines* states: “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.”

Potentially Significant Project Impacts

The Project impacts that would be significant and unavoidable consist of the following:

- **Aesthetics** – Public Views of Scenic Vistas and Views of the Project Site (Temporary Construction)
- **Air Quality** – Generated PM₁₀ Emissions (Temporary Construction)
- **Noise** – Exposure of Persons to Excessive Noise Levels (Temporary Construction)

The Project impacts that would be less than significant with mitigation include the following:

- **Aesthetics** – Shading/Shadows Winter Solstice (Roadway Shading)

- **Biological Resources** – Special-status Plant and Animal Species, and Conformance with Town Policies and Ordinances
- **Cultural Resources** – Archaeological Resources, Paleontological Resources, and Human Remains
- **Geology and Soils** – Strong Seismic Ground Shaking, Soil Erosion/Loss of Topsoil, Volcanic Activity
- **Hazards and Hazardous Materials** - Upset and Accidental Release of Hazardous Materials (Construction)
- **Hydrology and Water Quality** – Water Quality Standards, Groundwater Depletion or Recharge, and Drainage System Capacity
- **Public Services** – Police Services

Project Contributions to Potentially Significant Cumulative Impacts

The Project incremental contribution to cumulative impacts that would be significant and unavoidable consists of the following:

- **Aesthetics** – Public Views of Scenic Vistas
- **Air Quality** – Generated PM₁₀ Emissions (Temporary Construction)
- **Noise** – Exposure of Persons to Excessive Noise Levels (Temporary Construction)
- **Utilities** – Water Supply

The Project's incremental contribution to cumulative impacts that would be less than significant with mitigation includes the following:

- **Traffic and Circulation** – Cumulative Plus Project Intersection LOS
- **Utilities** – Wastewater Infrastructure

All other impacts are less than significant and do not require mitigation. Therefore, the choice of Project alternatives for analysis in the EIR focused on those that would reduce or avoid significant aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, public services, traffic and circulation, and utilities impacts or further implement the intent of the *North Village Specific Plan* (“Specific Plan”).

Project Objectives

As stated above, the range of potential alternatives to the Project shall include those that could feasibly accomplish most of the basic objectives of the Project. The objectives of the Project are as follows:

- To create an intensely developed “Town Visitor Core” area and primary visitor oriented hub, with mixed uses proposed on the Town’s eastside locations.
- To complete the development within the North Village to fulfill its role as a major public place, animated by diverse shopping opportunities, short-term accommodations and entertainment venues.
- To create the economic synergy to allow a sustainable visitor core.
- To meet the overall intent of the North Village Specific Plan; which is to facilitate the development of the area as a concentrated, pedestrian-oriented activity center with limited vehicular access.
- To produce a development design that is appropriate to the character of the Mammoth Lakes region.
- To enhance the Town to be comparable to other high-quality mountain resort destinations in North America.
- To develop additional affordable housing and visitor accommodations.
- To provide bicycle and pedestrian trails connections to existing trails and other town-wide circulation systems, so as to complement and enhance the town-wide trails network.
- To provide development that is responsive to the existing and expected future hotel demand within the Town.

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the State *CEQA Guidelines* states: “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Alternatives Rejected as Being Infeasible

As described above, Section 15126.6(c) of the State *CEQA Guidelines* requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. One alternative considered development of the proposed Project on an alternate site in the Town of Mammoth Lakes. However, this alternative was rejected for further analysis because the Project Applicant does not own any other property that would be feasible for this Project and cannot "reasonably acquire, control or otherwise have access to [an] alternative site" (refer to Section 15126.6(f)(1) of the *CEQA Guidelines*). Thus, this alternative was deemed infeasible.

Overview of Selected Alternatives

Four alternatives are evaluated in this analysis. Differences between the alternatives may include changes to the site plan, number of the residential units, density, building height and setbacks, and the amount of affordable housing. A more thorough description of each of the alternatives is provided below and shown in Table VI-1. The alternatives to be analyzed in comparison to the proposed Project include:

Alternative A: No Project No Build

Alternative B: No Public Parking

Alternative C: On-site Affordable Housing

Alternative D: Existing North Village Specific Plan Build-Out Condominium Only

Assumptions and Methodology

A project may have the potential to generate significant impacts, but considerations in Project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed Project. The following alternatives analysis compares the potential significant environmental impacts of the four alternatives with those of the proposed Project for each of the environmental topics analyzed in detail in Section IV, Environmental Impact Analysis, of this Draft EIR.

**Table VI-1
Alternatives Project Components Comparison**

Land Use	Proposed Project	Alternative A No Project No Build	Alternative B No Public Parking	Alternative C On-Site Affordable Housing	Alternative D Existing NVSP: Condominium Only
Residential Hotel Rooms					
Site 1	198 ⁽¹⁾	0	198	198	86
Site 2	364	18	364	364	217
Site 3	180	Vacant Buildings	180	180	142
Total	742	18	742	742	445
Density: Rooms Per Acre (RPA)					
Site 1: 1.7939 acres	110 RPA	n/a	110 RPA	110 RPA	48 RPA
Site 2: 4.5205 acres	81 RPA	.2 RPA	81 RPA	81 RPA	48 RPA
Site 3: 2.9629 acres	61 RPA	Vacant Buildings	61 RPA	61 RPA	48 RPA
Affordable Housing Rooms⁽²⁾					
Site 1	27 off-site	0	27 off-site	27 on-site	9.5 off-site
Site 2	45 on-site	0	45 on-site	45 on-site	24.5 on-site
Site 3	21 on-site	Vacant Buildings	21 on-site	21 on-site	16 on-site
Total	93	0	93	93	50
Full-Time Employee Equivalents (FTEE)					
Site 1	54	0	54	54	19
Site 2	90	0	90	90	49
Site 3	40.5	Vacant Buildings	40.5	40.5	32
Total	185	0	185	185	100
Non-Residential (Square Feet)					
Hotel/Visitor Amenities					
Site 1	14,390	0	14,390	14,390	0
Site 2	24,640	0	24,640	24,640	0
Site 3	30,120	Vacant Buildings	30,120	30,120	0
Total	69,150	0	69,150	69,150	0
Retail					
Site 1	22,000	±10,000	22,000	22,000	0
Site 2	18,500	±2,000	18,500	18,500	0
Site 3	0	Vacant Buildings	0	0	0
Total	40,500	0	40,500	40,500	0
Parking					
Site 1	241	±40	241	241	103
Site 2	330	±10	330	330	260
Site 3	149 ⁽³⁾	Vacant Buildings	149	149 ⁽³⁾	170
Total	720		720	720	533
Height (Feet)					
Site 1	30 to 103	20 to 30	30 to 103	30 to 103	50
Site 2	20 to 130	20	20 to 130	20 to 130	50
Site 3	65 to 85	20 to 30	65 to 75	65 to 85	50
<i>Notes:</i>					
(1) Could be built as 24 two-bedroom units.					
(2) Affordable Housing is considered two-bedroom units.					
(3) Site 3 includes 149 required parking spaces for use by guests and visitors to Site 3, and additional 100 public parking spaces.					
<i>Source: Mammoth Crossing Ventures, LLC and Christopher A. Joseph & Associates (June 2008).</i>					

A. NO PROJECT NO BUILD ALTERNATIVE

Description

As required by CEQA, this subsection analyzes a “No Project No Build” Alternative (“Alternative A”). Under Alternative A, the proposed Project would not be constructed, and the Project site would remain in its current condition. As previously described in this Draft EIR, Project Sites 1 through 3 include existing development as follows:

- Site 1 comprises approximately two acres, of which approximately .05 acres is a vacated right-of-way. In addition to the existing Whiskey Creek Restaurant, Site 1 contains several existing buildings and paved surface parking areas.
- Site 2 comprises a total of approximately five acres, of which approximately one acre is a vacated right-of-way. Site 2 has a vacant church and seven existing buildings, including the North Village Inn, some office/retail and storage structures, and surface parking.
- Site 3 comprises a total of approximately three acres. The existing Ullr Lodge and White Stag Inn are located on Site 3. Both the Ullr Lodge and the White Stag Inn have surface parking areas and a series of small accessory structures on site.
- There is no existing development on Site 4. Site 4 is proposed to be incorporated into the Specific Plan boundary and no new development is proposed on Site 4 as part of this Project.

The analysis of Alternative A assumes the continuation of existing conditions as well as development of the related projects described in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The potential environmental impacts associated with Alternative A are described below and are compared to the potentially significant environmental impacts associated with the Project.

Aesthetics

Under Alternative A, no grading, tree and vegetation removal, or development would occur on the Project site and the existing aesthetic characteristics would remain unchanged. There would be no impacts to scenic views or resources and no new sources of light and glare on the site. Therefore, this alternative would eliminate the Project’s significant and unavoidable impacts to aesthetics. Overall impacts to aesthetics would be less under Alternative A than under the Project.

Air Quality

Under Alternative A, no grading or construction would occur at the site. Thus, this alternative would not generate any fugitive dust or other pollutant emissions associated with construction activities at the Project site. Implementation of Alternative A would eliminate the Project's short-term, significant and unavoidable and subsequently the Project's cumulative air quality impacts with regards to respirable particulate matter (PM₁₀) resulting from construction activities. Additionally, this EIR concluded that the long-term operation of the proposed Project would result in less-than-significant impacts to air quality. Under Alternative A, development would not occur on the site; therefore, no new traffic trips would be generated. As such, Alternative A would not generate any pollutant emissions associated with long-term operation of a resort development and would eliminate the Project's less-than-significant air quality impacts associated with long-term operation of the Project. Overall impacts to air quality would be less under Alternative A than under the Project.

Biological Resources

Because the Project site would not be developed under Alternative A, no trees or vegetation would be removed from the site. Thus, this alternative would eliminate the proposed Project's significant but mitigable impacts related to special-status plant and animal species, as well as conformance with Town policies and ordinances. Overall impacts to biological resources would be less under Alternative A than under the Project.

Cultural Resources

Under Alternative A, no ground-disturbing activities would occur. Therefore, this alternative would not have the potential to damage or destroy unknown archaeological resources, paleontological resources and human remains. Thus, the proposed Project's significant but mitigable impacts to cultural resources would be eliminated under this alternative. Overall impacts to cultural resources would be less under Alternative A than under the Project.

Geology and Soils

Under Alternative A, no development would occur on the site. Therefore, this alternative would eliminate the Project's significant but mitigable impacts related to strong seismic ground shaking, soil erosion/loss of topsoil and volcanic activity. Overall impacts to geology and soils would be less under Alternative A than under the Project.

Hazards and Hazardous Materials

Under Alternative A, no development would occur on the site. Therefore, this alternative would eliminate the Project's significant but mitigable impacts related to upset and accidental release of hazardous

materials during the construction of the Project. Overall impacts to hazards and hazardous materials would be less under Alternative A than under the Project.

Hydrology and Water Quality

Under Alternative A, no development would occur on the site. Therefore, this alternative would eliminate the Project's significant but mitigable impacts related to water quality standards, groundwater deletion or recharge, and drainage system capacity. Overall impacts to hydrology and water quality would be less under Alternative A than under the Project.

Land Use and Planning

Alternative A would not involve any development. As such, this alternative would result in no impacts related to policy inconsistency or land use incompatibility. As such, no significant land use impacts would occur under Alternative A. Overall impacts to land use and planning would be less under Alternative A than under the Project.

Noise

Alternative A would not involve any grading or construction of the Project site. Therefore, this alternative would eliminate the proposed Project's significant and unavoidable temporary construction noise impacts. Overall impacts to noise would be less under Alternative A than under the Project.

Population and Housing

Alternative A would not involve any new development. As such, no impacts related to population and housing would occur. Therefore, overall impacts to population and housing would be less than that of the proposed Project.

Public Services

Police Service

Under Alternative A, there would be no development of residential land uses and no additional residents on the Project site, and thus, this alternative would not create additional demand for police protection services. Therefore, implementation of this alternative would eliminate the Project's significant but mitigable impacts to police protection services. Overall impacts to police services would be less under Alternative A than under the Project.

Fire Protection

Under Alternative A, there would be no development of residential land uses and no additional residents on the Project site, and thus, this alternative would not create additional demand for fire protection

services. Therefore, implementation of this alternative would eliminate the Project's less-than-significant impacts to fire protection services. Overall impacts to fire protection services would be less under Alternative A than under the Project.

School Service

Under Alternative A, there would be no development of residential land uses and no additional residents and school-aged children on the Project site, and thus, this alternative would not create additional demand for school services. Therefore, implementation of this alternative would eliminate the Project's less-than-significant impacts to school services. Overall impacts to school services would be less under Alternative A than under the Project.

Parks and Recreation

Under Alternative A, there would be no development of residential land uses and no additional families on the Project site, and thus, this alternative would not create additional demand for parks and recreation services. Therefore, implementation of this alternative would eliminate the Project's less-than-significant impacts to parks and recreation services. Overall impacts to parks and recreation would be less under Alternative A than under the Project.

Snow Removal Services

Under Alternative A, there would be no development on the Project site, and thus, this alternative would not create additional demand for snow removal services from the Town. Therefore, implementation of this alternative would eliminate the Project's less-than-significant impacts to snow removal services. Overall impacts to snow removal services would be less under Alternative A than under the Project.

Traffic and Circulation

Under Alternative A, no development on the Project site would occur. As such, no traffic trips would be generated. This Draft EIR concluded that the proposed Project would result in significant but mitigable cumulative impacts related to unacceptable intersection LOS F operations at the USPO Driveway/Main Street intersection. Therefore, implementation of this alternative would eliminate this cumulative traffic and circulation impact. Overall impacts to traffic and circulation would be less under Alternative A than under the Project.

Utilities

Wastewater

Because Alternative A would not result in new development on the Project site, this alternative would not result in the generation of wastewater at the Project site. Thus, Alternative A would eliminate the

Project's incremental contribution to cumulative significant but mitigable impacts related to wastewater infrastructure. Overall impacts to wastewater demand and infrastructure would be less under Alternative A than under the Project.

Water Service

Because Alternative A would not result in new development on the Project site, this alternative would not result in a demand for more water at the Project site. Thus, Alternative A would eliminate the Project's incremental contribution to cumulative significant and unavoidable impacts to water supply impacts. Overall impacts to water service and infrastructure would be less under Alternative A than under the Project.

Electricity

Because Alternative A would not result in new development on the Project site, this alternative would not result in a demand for electricity at the Project site. Thus, Alternative A would eliminate the Project's less-than-significant impacts to electricity supply impacts. Overall impacts to electricity service and infrastructure would be less under Alternative A than under the Project.

Propane

Because Alternative A would not result in new development on the Project site, this alternative would not result in a demand for propane at the Project site. Thus, Alternative A would eliminate the Project's less-than-significant impacts to propane supply impacts. Overall impacts to electricity service and infrastructure would be less under Alternative A than under the Project.

Relationship of the Alternative to the Proposed Project Objectives

As stated previously, under Alternative A, the proposed Project would not be constructed and therefore does not meet any of the Project objectives listed on page VI-3.

B. NO PUBLIC PARKING ALTERNATIVE

Description

Under the No Public Parking Alternative (“Alternative B”), the 100 public parking spaces on Site 3 would not be incorporated into the development and as a result the height of Site 3 development could be slightly reduced. However, the number of residential hotel rooms, density (rooms per acre), non-residential uses for hotel amenities and operations, and parking requirements would remain the same as the proposed Project. Demolition of existing structures, understructure parking and limited surface parking for hotel check-in, public spaces, recreation opportunities, new pedestrian and bike pathways, as well as connections to existing pedestrian and bike pathways, would be developed similar to the Project. All roadway alignments and associated grading and drainage improvements would be the same as the Project. Other characteristics (e.g., lighting, landscaping, and utility connections) would be the same as the Project. The proposed Project’s Site 4 would have no new development; this parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and under Alternative B would be incorporated as approved into the Specific Plan boundary, same as the Project.

Under Alternative B, the Project would include the construction of up to 742 condominium/hotel rooms, up to approximately 69,150 square feet of hotel amenities and operations, 711 parking spaces and nine spaces for hotel guest check-in. Affordable housing would be the same as the proposed Project. The 27 affordable rooms associated with development on Site 1 would be constructed off site. The 45 affordable rooms required by Site 1 development and 21 affordable rooms required by Site 2 development would be built on each site, respectively.

Similar to the Project, Alternative B would be organized so that it would be developed in several phases. Each phase would stand alone and operate successfully as a complete entity. Construction activities are proposed to be completed by 2020. The analysis of Alternative B assumes development of the related Projects described in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The potential environmental impacts associated with this alternative are described below and are compared to the potentially significant environmental impacts associated with the Project.

Aesthetics

Similar to the Project, Alternative B would result in development on the site. Similar to the Project, building design and materials under Alternative B would be consistent with the requirements of the Specific Plan and would be reviewed by the Town to ensure that the buildings would be responsive and complement the existing alpine architectural character of nearby development and the design of the existing Specific Plan area. Alternative B would aim to organize the form and mass of each of its proposed buildings relative to the scale of neighboring buildings and the surrounding tree-canopy.

Similar to the Project, all signage and lighting would be designed in a style that reflects mountain resort community character with regard to materials, form and use. Lighting would comply with the applicable requirements of the Town of Mammoth Lakes Outdoor Lighting Ordinance, in accordance with Mammoth Lakes Municipal Code Chapter 17.34. Building heights would be similar to the Project with the exception of Site 3. The elimination of the 100 public parking spaces would facilitate the slight reduction in height of the Site 3 hotel; however the hotel would still exceed the 50 foot height limit measured from above the underside of the parking garage ceiling as identified in the current Specific Plan. Therefore, impacts to public views of the Mammoth Knolls from View 8 (Minaret Road Looking North) would be reduced but not eliminated. All other public views to scenic vistas would be similar to the proposed Project. The Project's temporary significant and unavoidable construction impacts would not be eliminated under Alternative B. Therefore, overall impacts to aesthetics would be the less under Alternative B than under the Project.

Air Quality

Alternative B would result in similar construction activities on the site to those of the proposed Project, therefore generating similar construction equipment emissions. Similar the Project, Alternative B would result in significant and unavoidable construction related respirable particulate matter (PM₁₀) emissions. Operational emissions from stationary sources (propane for space and water heating devices, cooking appliances, fireplaces, and operation of landscape equipment) would be the same as the Project. Traffic trips associated with the 100 public parking spaces would be eliminated; therefore, operational emissions of ozone (O₃), (PM₁₀) and carbon monoxide (CO) would be the less than those of the proposed Project. Impacts from odors would be the same as under the Project. Overall impacts to air quality would be less under Alternative B than the Project due to the elimination of the 100 public parking spaces.

Biological Resources

Similar to the Project, Alternative B would result in development on the site, but without the 100 public parking spaces. However, this would not result in fewer disturbances to the area because the loss of public parking would not result in a reduction in the overall development footprint. Therefore, the amount of biological resources that could be impacted would be the same as those of the proposed Project. Overall impacts to biological resources would be the same as those of the proposed Project under Alternative B.

Cultural Resources

Similar to the Project, Alternative B would result in development on the site, but without 100 public parking spaces. This would not result in fewer disturbances to the area because the loss of public parking would not result in a reduction in the overall development footprint. Therefore, implementation of Alternative B would result in the same construction-related earthmoving activities with the potential to

impact cultural resources similar to those of the proposed Project. Overall impacts to cultural resources would be the same as those of the proposed Project under Alternative B.

Geology and Soils

Similar to the Project, Alternative B would result in development on the site, but without 100 public parking spaces. This would not result in a reduction of the development footprint. Under Alternative B, impacts from strong seismic ground shaking, soil erosion/loss of topsoil and volcanic activity would be the same as those of the proposed Project. Overall impacts to geology and soils would be the same as those of the proposed Project under Alternative B.

Hazards and Hazardous Materials

Similar to the Project, Alternative B would result in development on the site, but without 100 public parking spaces. Development of Alternative B would require the demolition of all existing building on site and therefore the upset and accidental release of hazardous materials would be the same of that of the proposed Project. In addition, the proposed development would be required to comply with the standards relevant to construction within a wildland fire hazard zone. Overall hazards and hazardous materials impact would be the same as the proposed Project under Alternative B.

Hydrology and Water Quality

Similar to the Project, Alternative B would result in development on the site, but without 100 public parking spaces. Alternative B would not reduce the overall development footprint. Therefore, development of Alternative B would result in the same construction-related earthmoving activities and would decrease the potential for construction impacts to significantly affect water quality standards. Operational impacts of Alternative B would likewise not be reduced from that of the proposed Project due to the development of the same building footprint. Impacts from groundwater depletion or recharge, and drainage system capacity would also be the same as that of the proposed Project. Similar to the Project, Alternative B would be located entirely outside the 100-year flood zone and this impact would be similar. Overall impacts to hydrology and water quality would be the same as that of the proposed Project under Alternative B.

Land Use

Similar to the Project, Alternative B would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and hotel/visitor amenities. Development of Alternative B would eliminate the 100 public parking spaces and would therefore not support development of strategically located public parking facilities pursuant to General Plan Policy M.6.B. Alternative B would not introduce an incompatible land use in the Specific Plan area. Nonetheless, construction of Alternative B would be generally consistent with applicable land use policies, plans and regulations the same as the proposed Project. Similar to the Project, Alternative B would not be

consistent with the existing Specific Plan density, height, and setbacks. Alternative B would require approval of certain discretionary actions by the Town, same as the Project. Overall impacts to land use under Alternative B would be the same as those of the proposed Project.

Noise

Alternative B would result in construction activities on the site and would generate a similar amount of temporary construction equipment noise and groundborne vibration as under the Project. Development of Alternative B would result in significant and unavoidable temporary construction impacts similar to the proposed Project.

Similar to the Project, Alternative B would not be subject to excessive operational groundborne vibration. Operational impacts resulting from traffic-generated noise would be less than the Project due to the decrease in vehicle trips resulting from the elimination of the 100 public parking spaces on Site 3. Therefore, overall impacts to noise under Alternative B would be less than under the Project.

Population and Housing

Alternative B would result in the construction of hotel/condominium rooms units and would not include the 100 public parking spaces on Site 3. Similar to the Project, construction of Alternative B would result in the creation of temporary construction jobs and the creation of permanent jobs. Under Alternative B, full-time employee equivalents (“FTEE”) would be the same as that of the proposed Project and therefore affordable housing requirements would be the same. Similar to the proposed Project some affordable housing would be constructed off site and would be required to undergo separate environmental review.

Under Alternative B, like the proposed Project, 18 existing residential units located on Site 2 in the North Village Inn and would be removed and would be replaced with up to 24 permanent year-round residential housing units and 33 affordable housing units to realize a total of 57 permanent year-round on-site housing units. In addition, Alternative B would comply with Town Municipal Code 17.52 “Conversion of Existing Residential Facilities.”

Alternative B would construct hotel/condominium rooms units within the Town, some of which could be permanent year-round housing. This permanent and seasonal/visitor serving housing, when considered cumulatively, would increase the Persons At One Time population of the Town (“PAOT”). The PAOT is used as the Town’s threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. Similar to the proposed Project, the Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation under Alternative B would not exceed the anticipated PAOT of 52,000.

Under Alternative B, overall impacts to population and housing would be the similar to that of the proposed Project.

Public Services

Police Service

Similar to the Project, Alternative B would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and non-residential land uses. Unlike the proposed Project, Alternative B would not include 100 public parking spaces on Site 3. Similar to the Project, Alternative B would result in a temporary increase in population in the Town due to the influx of construction workers and a permanent increase in the population of the Town resulting from the construction of new housing units, which would attract new residents and visitors requiring additional demand for police services.

As stated above under heading “Population and Housing,” the overall PAOT would be the same as the proposed Project. Therefore, demand for police service would be the same as the proposed Project under Alternative B. Overall impacts to police services would be the same as the proposed Project under Alternative B.

Fire Protection

Similar to the Project, Alternative B would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and non-residential land uses. Unlike the proposed Project, Alternative B would not include 100 public parking spaces on Site 3. Similar to the Project, Alternative B would result in a temporary increase in population in the Town due to the influx of construction workers and a permanent increase in the population of the Town resulting from the construction of new housing units, which would attract new residents and visitors requiring additional demand for fire protection services.

As stated above under heading “Population and Housing,” the overall PAOT would be the same as the proposed Project. Therefore, demand for fire protection service would be the same as those of the proposed Project under Alternative B. Overall impacts to fire protection services would be the same under Alternative B as those under the proposed Project.

School Service

Under Alternative B, the increase in permanent year-round housing on the Project site would be the same as the proposed Project, and thus, the number of students generated and the demand for school services is the same as the proposed Project. Similar to the proposed Project, the development under Alternative B would be required to pay the developer impact fees established by the Mammoth Lakes Unified School District (\$2.63 per square foot of residential development and \$0.42 per square feet of commercial

development). Pursuant to California Government Code provided in Section 65996, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of these required developer fees, overall impacts to school services would be the same under Alternative B as those under the Project.

Parks and Recreation

Under Alternative B, there would be the same number of residential and visitor serving land uses on the Project site. Unlike the proposed Project, Alternative B would not include 100 public parking spaces on Site 3. As stated above under heading “Population and Housing,” the overall PAOT would be the same as the proposed Project. Therefore, the overall PAOT generated by the development of Alternative B would be the same as the proposed Project; therefore, the demand for parks and recreational services would be the same. In addition, similar to the proposed Project under Alternative B, on-site permanent residents would be provided separate and private recreational amenities pursuant to Policy 5 of the Parks and Recreation Element of the Specific Plan. Therefore, overall impacts to park and recreational services would be the same as the proposed Project under Alternative B.

Snow Removal Services

Under Alternative B, there would be the same residential and visitor serving amenities as the proposed Project. Unlike the proposed Project, Alternative B would not include 100 public parking spaces on Site 3. Similar to the Project, the internal roadway system under Alternative B would be privately owned and maintained. The management of snow at the site would be the sole responsibility of Mammoth Crossing property owners or their designated representative association. In addition, the development under Alternative B would be subject to the same standards of the proposed Project and would be required to submit a Snow Management Plan (“SMP”) for approval by the Town and the Mammoth Lakes Fire Protection District. Therefore, implementation of this alternative would result in the same impacts to snow removal services. Overall impacts to snow removal services would be the same under Alternative B as those of the Project.

Traffic and Circulation

Alternative B would result in the same construction of residential and retail visitor serving amenities as the proposed Project. Alternative B would be accessed at the same points and would have a similar roadway configuration and emergency access as the Project. Parking under Alternative B would be subject to the same *North Village Specific Plan* ratio requirements as the proposed Project. Bicycle and pedestrian facilities and transit facilities would be similar to the Project. Unlike the proposed Project, Alternative B would not provide 100 public parking spaces on Site 3. As such, the number of vehicle trips generated under Alternative B would be the less than under the Project. Therefore, overall impacts to transportation and circulation would be less than the proposed Project.

Utilities

Wastewater

Alternative B would result in the same generation of wastewater from residential land uses and retail and visitor serving amenities. Similar to the Project, Alternative B would result in development on the site but no public parking spaces would be provided. Therefore, Alternative B would generate the same amount of wastewater as the proposed Project. Similar to the Project, Alternative B would require installation of wastewater infrastructure and impacts to wastewater infrastructure would be the same as under the Project. Overall impacts to water wastewater generation and infrastructure would be the same as those of the proposed Project.

Water Service

Alternative B would result in demand for water supply from residential land uses and retail and visitor serving amenities. Similar to the Project, Alternative B would result in development on the site but no public parking spaces would be provided. Therefore, Alternative B would result in the same demand for water supply as the Project and impacts to water supply would be the same as those of the proposed Project. Similar to the Project, Alternative B would require installation of water supply infrastructure and impacts to water supply infrastructure would be the same as under the Project. Overall impacts to water supply and infrastructure would be the same as the proposed Project.

Electricity

Alternative B would result in demand for electricity supply from residential land uses and retail and visitor serving amenities. Similar to the Project, Alternative B would result in similar development on the site, but no public parking spaces would be provided. Therefore, Alternative B would result in the same demand for electricity as the Project and impacts to electricity supply would be the same as those of the proposed Project. Similar to the Project, Alternative B would require installation of electricity supply infrastructure and impacts to electricity supply infrastructure would be the similar to the proposed Project. Therefore, overall impacts to electricity demand would be the same as those of the Project.

Propane

Alternative B would result in demand for propane supply from residential land uses and retail and visitor serving amenities. Similar to the Project, Alternative B would result in similar development on the site, but no public parking spaces would be provided. Therefore, Alternative B would result in the same demand for propane as the Project and impacts to propane supply would be the same as those of the proposed Project. Similar to the Project, Alternative B would require installation of propane supply infrastructure and impacts to propane supply infrastructure would be the similar to the proposed Project. Therefore, overall impacts to propane demand would be the same as those of the Project.

Relationship of the Alternative to the Proposed Project Objectives

Alternative B would meet all of the Project objectives by creating an intensely developed “Town Visitor Core” by redeveloping the underdeveloped parcels within the Specific Plan area to completing development of the North Village, as well as meeting the overall intent of the current Specific Plan. Alternative B would produce a design that is appropriate to the character of the Mammoth Lakes region and provide bicycle and pedestrian trail connections to existing trails and other town-wide circulation systems, so as to complement and enhance the town-wide trails network. Under Alternative B the number of affordable housing and visitor accommodations would be the same as that of the proposed Project.

C. ON-SITE AFFORDABLE HOUSING ALTERNATIVE

Description

Under the On-site Affordable Housing Alternative (“Alternative C”), the number of residential hotel rooms, density (rooms per acre), all non-residential uses and square footage, parking requirements and setbacks would remain the same as the proposed Project. Demolition of existing structures, understructure parking and limited surface parking for hotel check-in, public spaces, recreation opportunities, new pedestrian and bike pathways, as well as connections to existing pedestrian and bike pathways, would be developed the same as the Project. All roadway alignments and associated grading and drainage improvements would be the same as the Project. Other characteristics (e.g., lighting, landscaping, and utility connections) would be the same as the Project. The proposed Project’s Site 4 would have no new development; this parcel, located along Minaret Road, is currently part of the *Lodestar Master Plan* area, and, under Alternative C, would be incorporated as approved into the Specific Plan boundary, same as the Project.

Affordable housing is required to be provided as part of the Project, some of which was initially proposed to be constructed off site and as such would be required to undergo separate environmental review. Alternative C proposes Site 1, Site 2, and Site 3 to be developed the same as the Project, with the exception of the 27 affordable housing rooms required by development on Site 1 be constructed on Site 1 rather than off site. This would eliminate the need to find an off-site location and would ensure that the Project’s affordable housing obligation would be met in a timely manner. Similar to the Project, Site 2 and Site 3 would accommodate on-site affordable housing rooms (Site 2, 45 rooms; Site 3, 21 rooms), which would be constructed when each site is developed. The inclusion of the 27 affordable housing rooms on Site 1 would increase the permanent housing analyzed in this Draft EIR by 13.5 units (70.5 as opposed to 57) and would increase the permanent population analyzed in this Draft EIR by 33 permanent residents (172 as opposed to 139).

Similar to the Project, Alternative C would be organized so that it would be developed in several phases. Each phase would stand alone and operate successfully as a complete entity. Construction activities are proposed to be completed by 2020. The proposed Project would involve multiple buildings ranging in height from one to approximately seven stories. Under Alternative C, all buildings heights would remain the same as the Project with the exception of Site 1’s northern-most building, which would accommodate the construction of the required 27 affordable housing units. The inclusion of affordable housing on Site 1 would necessitate an increase of height to this building to accommodate the additional rooms. Similar to the Project, building heights on Site 1 would be at or below 103 feet in height from above the underside of parking garage ceiling (8,035 elevation).

The analysis of Alternative C assumes development of the related projects described in Table II-1, Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been

approved. The potential environmental impacts associated with Alternative C are described below and are compared to the potentially significant environmental impacts associated with the Project.

Aesthetics

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, more residential rooms would be constructed on Site 1, necessitating an increase of height to the northern-most building. Under Alternative C, building heights on Site 1 would be at or below 103 feet in height from above the underside of parking garage ceiling (8,035 elevation), same as the Project. However, due to the close proximity of this building to the Fireside Condominiums, shading impacts to adjacent residential land uses would be greater than those of the proposed Project.

Similar to the Project, building design and materials under Alternative C would be consistent with the requirements of the Specific Plan and would be reviewed by the Town to ensure that the buildings would be responsive and complement the existing alpine architectural character of nearby development and the design of the existing Specific Plan area. Similar to the Project, all signage and lighting would be designed in a style that reflects mountain resort community character with regard to materials, form and use. Lighting would comply with the applicable requirements of the Town of Mammoth Lakes Outdoor Lighting Ordinance, in accordance with Mammoth Lakes Municipal Code Chapter 17.34. Impacts to public views of scenic vistas would be the same as the Project. The Project's temporary significant and unavoidable construction impacts would not be eliminated under Alternative C. Additionally, Alternative C would not reduce the partial obstruction of the Mammoth Knolls. Due to the increase in height and subsequent shading impacts, overall impacts to aesthetics under Alternative C would be the greater than those of the Project.

Air Quality

Alternative C would result in construction activities on the site and would generate a similar amount of construction equipment emissions as under the Project. Similar the Project, Alternative C would result in significant and unavoidable construction related respirable particulate matter (PM₁₀) emissions. Operational emissions from stationary sources (propane for space and water heating devices, cooking appliances, fireplaces, and operation of landscape equipment) would be more than the Project due to the increase in residential units. Operational emissions of ozone (O₃), PM₁₀ and carbon monoxide (CO) would be more than under the Project due to the increase in residential units. Impacts from odors would be the same as under the Project. Overall impacts to air quality would be more under Alternative C than the Project due to the increase in vehicle trips due to the increase in on-site residential units.

Biological Resources

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential rooms, an increase of height would occur to the northern-most building on Site 1. This would not result

in more disturbances to the area, because the development footprint remains the same as the Project. Therefore the same amount of biological resources could potentially be impacted. Although impacts to special-status plant and animal species would be reduced to less than significant under the Project, the potential for impacts would be the same as that of the Project under Alternative C. Overall impacts to biological resources would be the same as that of the proposed Project under Alternative C.

Cultural Resources

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential units, an increase of height would occur to the northern-most building on Site 1. This would not result in more disturbances to the area, because the development footprint remains the same as the Project. Therefore, implementation of Alternative C would result in the same amount of construction-related earthmoving activities as those of the proposed Project with the potential to impact cultural resources. Overall impacts to cultural resources would be the same as those of the proposed Project under Alternative C.

Geology and Soils

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential rooms, an increase of height would occur to the northern-most building on Site 1. However, this would not result in a reduction in the development footprint. Under Alternative C, impacts from strong seismic ground shaking, soil erosion/loss of topsoil and volcanic activity would be the same as the Project. Overall impacts to geology and soils would be the same as the proposed Project under Alternative C.

Hazards and Hazardous Materials

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential rooms, an increase of height would occur to the northern-most building on Site 1. Under Alternative C, the demolition of existing buildings on site would be required, and therefore the upset and accidental release of hazardous materials would be the same as that of the proposed Project. In addition, the proposed development would be required to comply with the standards relevant to construction within a wildland fire hazard zone. Overall hazards and hazardous materials impact would be the same as the proposed Project under Alternative C.

Hydrology and Water Quality

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential rooms, an increase of height would occur to the northern-most building on Site 1. Under Alternative C,

development would result in the same amount of construction-related earthmoving activities as the Project and would not decrease the potential for construction impacts to significantly affect water quality standards. Operational impacts under Alternative C would likewise be the same compared to the Project due to the same development footprint. Impacts from groundwater depletion or recharge, and drainage system capacity would also be the same as that of the proposed Project. Similar to the Project, Alternative C would be located entirely outside the 100-year flood zone and this impact would be similar. Overall impacts to hydrology and water quality would be the same as the proposed Project under Alternative C.

Land Use

Similar to the Project, Alternative C would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and non-residential land uses. Under Alternative C, Site 1 would develop more residential rooms than under the Project. To accommodate the increase in residential rooms, an increase of height would occur to the northern-most building on Site 1. Similar to the Project, construction of Alternative C would be generally consistent with applicable land use policies, plans and regulations. Similar to the Project, Alternative C would not be consistent with the existing Specific Plan density, height, setbacks and lot coverage. Alternative C would not introduce an incompatible land use in the Specific Plan area. Alternative C would require approval of certain discretionary actions by the Town, same as the Project. Overall impacts to land use under Alternative C would be the same as those of the proposed Project.

Noise

Under Alternative C, construction activities on the site would generate a similar amount of temporary construction equipment noise and groundborne vibration as under the Project. Development of Alternative C would result in significant and unavoidable temporary construction impacts similar to the proposed Project. Similar to the Project, Alternative C would not be subject to excessive operational groundborne vibration. Operational impacts resulting from traffic-generated noise would increase over the Project due to the increase in vehicle trips resulting from the increase in the number of residential rooms on Site 1. Residential uses generate noise and more rooms would potentially generate more noise. Under Alternative C, overall impacts to noise would be more than the Project.

Population and Housing

The Project is required to provide housing for the estimated number of its fulltime equivalent employees (“FTEE”). Similar to the Project, Alternative C would include the construction of condominiums, hotel rooms and workforce housing units, and would result in the creation of temporary construction jobs and the creation of permanent jobs within the Town.

Under Alternative C, like the proposed Project, 18 existing residential units located on Site 2 in the North Village Inn and would be removed and would be replaced with up to 24 permanent year-round residential

housing units and 46.5 affordable housing units to realize a total of 70.5 permanent year-round on-site housing units. In addition, Alternative C would comply with Town Municipal Code 17.52 “Conversion of Existing Residential Facilities.”

Alternative C would result in permanent and seasonal/visitor serving housing when considered cumulatively would increase the Persons At One Time population of the Town (“PAOT”). The PAOT is used as the Town’s threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. Similar to the proposed Project, the Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation under Alternative C would not exceed the anticipated PAOT of 52,000.

With the inclusion of 27 additional affordable housing units under Alternative C, overall impacts to population and housing would be the greater than those of the proposed Project.

Public Services

Police Service

Similar to the Project, Alternative C would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and non-residential land uses. Similar to the Project, Alternative C would result in a temporary increase in population in the Town due to the influx of construction workers and a permanent increase in the population of the Town resulting from the construction of new housing units, which would attract new residents and visitors requiring additional demand for police services. As stated above under heading “Population and Housing,” the overall PAOT analyzed in this Draft EIR would be greater than the proposed Project. Therefore, demand for police service would be the greater than proposed Project under Alternative C. With the inclusion of 27 affordable housing units, overall impacts to police services would be the greater under Alternative C than as the Project.

Fire Protection

Similar to the Project, Alternative C would result in development on the site with construction of hotel/condominium rooms, affordable housing rooms, and non-residential land uses. Similar to the Project, Alternative C would result in a temporary increase in population in the Town due to the influx of construction workers and a permanent increase in the population of the Town resulting from the construction of new housing units, which would attract new residents and visitors requiring additional fire protection services. As stated above under heading “Population and Housing,” the overall PAOT analyzed in this Draft EIR would be greater than the proposed Project. Therefore, demand for fire service would be the greater than proposed Project under Alternative C. With the inclusion of 27 affordable

housing units, overall impacts to fire services would be the greater under Alternative C than as the Project.

School Service

Under Alternative C, there would be an increase in permanent year-round housing on the Project site, and thus, this alternative would increase the number of students generated and would create an additional demand for school services from that of the proposed Project. However, similar to the proposed Project, the development under Alternative C would be required to pay the developer impact fees established by the Mammoth Lakes Unified School District (\$2.63 per square foot of residential development and \$0.42 per square foot of commercial development). Pursuant to California Government Code provided in Section 65996, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of these required developer fees, overall impacts to school services would be the same under Alternative C than under the Project.

Parks and Recreation

Under Alternative C, there would be more permanent year-round residential units on the Project site. As a result, the overall PAOT generated by the development of Alternative C would be the greater than that of the proposed Project; therefore, the demand for parks and recreational services would be the greater. In addition, similar to the proposed Project under Alternative C, on-site permanent residents would be provided separate and private recreational amenities pursuant to Policy 5 of the Parks and Recreation Element of the Specific Plan. Overall impacts to park services would be the same under Alternative C as those of the proposed Project.

Snow Removal Services

Under Alternative C, there would be more residential rooms developed; however, the development footprint would be the same as the Project. Similar to the Project, the internal roadway system under Alternative C would be privately owned and maintained. The management of snow at the site would be the sole responsibility of Mammoth Crossing property owners or their designated representative association. In addition, the development under Alternative C would be subject to the same standards of the proposed Project and would be required to submit a Snow Management Plan (“SMP”) for approval by the Town and the Mammoth Lakes Fire Protection District. Therefore, implementation of this alternative would result in the same impacts to snow removal services. Overall impacts to snow removal services would be the same under Alternative C as those of the Project.

Traffic and Circulation

Similar to the Project, Alternative C would result in development on the site. Under Alternative C, more residential rooms would be constructed on Site 1. Therefore, the number of vehicle trips created under Alternative C would be the greater than the Project. Alternative C would be accessed at the same points

and would have a similar roadway configuration and emergency access as the Project. Same as the Project, parking under Alternative C would be provided under the same ratios as required by the Town Code. Bicycle and pedestrian facilities and transit facilities would be similar to the Project. Overall impacts to transportation and circulation would be greater than the Project due to the increase in vehicle trips created by the increase in residential land uses.

Utilities

Wastewater

Alternative C would result in the generation of wastewater from residential and non-residential land uses. Alternative C would result in development on the site, but with more permanent year-round housing than the Project. Therefore, Alternative C would result with more wastewater generation than the Project. Similar to the Project, Alternative C would require installation of wastewater infrastructure and impacts to wastewater infrastructure would be more than under the Project. Overall impacts to wastewater generation would be greater than under the Project.

Water Service

Alternative C would result in demand for water supply from residential and non-residential land uses. Alternative C would result in development on the site, but with more permanent year-round housing than the Project. Therefore, Alternative C would result with more water supply demand than the Project. Overall impacts to water supply demand would be greater than under the Project.

Electricity

Alternative C would result in demand for electricity supply from residential and non-residential land uses. Alternative C would result in development on the site, but with more permanent year-round housing than the Project. Similar to the Project, Alternative C would require installation of electricity supply infrastructure and impacts to electricity supply infrastructure would be the similar to the proposed Project. Therefore, overall impacts to electricity demand would be greater than under the Project.

Propane

Alternative C would result in demand for propane supply from residential and non-residential land uses. Alternative C would result in development on the site, but with more permanent year-round housing than the Project. Similar to the Project, Alternative C would require installation of propane supply infrastructure and impacts to propane supply infrastructure would be the similar to the proposed Project. Therefore, overall impacts to propane demand would be greater than under the Project.

Relationship of the Alternative to the Proposed Project Objectives

Alternative C would meet most of the Project objectives by creating an intensely developed “Town Visitor Core” by redeveloping the underdeveloped parcels within the Specific Plan area, completing development of the North Village, as well as meeting the overall intent of the current Specific Plan. Development under Alternative C would produce a design that is appropriate to the character of the Mammoth Lakes region and provide bicycle and pedestrian trail connections to existing trails and other town-wide circulation systems, so as to complement and enhance the town-wide trails network. Under Alternative C, all required affordable housing would be accommodated on site.

D. EXISTING NORTH VILLAGE SPECIFIC PLAN BUILD-OUT CONDOMINIUM ONLY ALTERNATIVE

Description

Under the Existing North Village Specific Plan Build-Out Condominium Only Alternative (“Alternative D”) the Mammoth Crossing development would be constructed according the existing regulations in the Specific Plan. Under the current Specific Plan Alternative D would not exceed maximum allowed density (rooms per acre) of 55 RPA, and the 48 RPA aggregate density for the Resort General (RG) zone, and the 48 RPA for the Specialty Lodging (SL) zone. In addition, the proposed buildings heights and setbacks would not exceed those required in the existing Specific Plan.

Under Alternative D the Mammoth Crossing development would be comprised of 445 condominium rooms at 48 rooms per acre (RPA). Affordable housing, totaling 12,500 square feet (approximately 50 rooms), would be required to be provided as part of the Project, some of which could be constructed off site. The 445 condominium rooms together with the affordable housing rooms would result in 248 two-bedroom, permanent year-round housing units in the Town. Similar to the Project, the fourth site proposes no new development as part of Alternative D. Site 4, located along Minaret Road, is currently part of the *Lodestar Master Plan* (“LMP”) area, and as part of Alternative D, is proposed to be incorporated as approved into the Specific Plan boundary and subsequently removed from the LMP.

Alternative D would constitute an overall reduction in residential density as compared to the Project, with approximately 40 percent fewer residential rooms (445 as opposed to 742). As stated above, building heights in Alternative D would be reduced from that of the proposed Project and would not exceed 50 feet as measured from above the underside of the parking garage ceiling as required in the existing Specific Plan. The reduced density facilitates the reduction in building height as the additional height would no longer be needed to accommodate the additional 297 rooms proposed under the Project.

Similar to the Project, Alternative D would be organized so that it would be developed in several phases. Each phase would stand alone and operate successfully as a complete entity. Construction activities are proposed to be completed by 2020. Alternative D would require the demolition of existing structures and proposes to include understructure parking, and new pedestrian and bike pathways as well as, connections to existing pedestrian and bike pathways. Except as described above, other characteristics (e.g., lighting, landscaping, and utility connections) are assumed to be generally similar to those of the proposed Project.

The analysis of Alternative D assumes development of the related projects described in Table II-1, Related Projects, in Section II, Environmental Setting, of this Draft EIR. The related projects list represents the broadest range of reasonable foreseeable development, including a number of projects that have not yet been approved. The potential environmental impacts associated with this alternative are described below and are compared to the potentially significant environmental impacts associated with the Project.

Aesthetics

Similar to the Project, Alternative D would result in development on the site. Under Alternative D, no retail components would be developed and fewer residential rooms would be constructed than under the Project resulting in buildings of reduced height.

Similar to the Project, building design and materials under Alternative D would be consistent with the requirements of the Specific Plan and would be reviewed by the Town to ensure that the buildings would be responsive and complement the existing alpine architectural character of nearby development and the design of the existing Specific Plan area. Similar to the Project, all signage and lighting would be designed in a style that reflects mountain resort community character with regard to materials, form and use. Lighting would comply with the applicable requirements of the Town of Mammoth Lakes Outdoor Lighting Ordinance, in accordance with Mammoth Lakes Municipal Code Chapter 17.34. The Project's temporary significant and unavoidable construction impacts would not be eliminated under Alternative D.

Because building heights would be limited to 50 feet measured from above the underside of the parking garage ceiling as required in the existing Specific Plan, impacts to public views of scenic vistas would be less than under the Project as the views of the Mammoth Knolls would no longer be partially obstructed. Therefore, overall impacts to aesthetics would be less under Alternative D than under the Project.

Air Quality

Alternative D would result in construction activities on the site and would generate a similar amount of construction equipment emissions as under the Project. Similar the Project, Alternative D would result in significant and unavoidable construction related respirable particulate matter (PM₁₀) emissions. Operational emissions from stationary sources (propane for space and water heating devices, and cooking appliances) would be reduced from that of the Project. Therefore, operational emissions of ozone (O₃), PM₁₀ and carbon monoxide (CO) would be less than that of the Project due to the elimination of retail components and reduction in residential units. Impacts from odors would be the same as under the Project. Overall impacts to air quality would be less under Alternative D than the Project due to the reduction in hotel/condominium rooms.

Biological Resources

Similar to the Project, Alternative D would result in development on the site but with no retail components being developed and fewer residential rooms. This would result in fewer disturbances to the area because the overall development footprint would be reduced. Therefore fewer biological resources could potentially be impacted. Although impacts to special-status plant and animal species would be reduced to less than significant under the Project, the potential for impacts would be less under Alternative D. Overall impacts to biological resources would be fewer than those of the proposed Project under Alternative D.

Cultural Resources

Similar to the Project, Alternative D would result in development on the site but with no retail components and fewer residential rooms. This would result in fewer disturbances to the area because the overall reduction in the development footprint. Therefore, implementation of Alternative D would result in less construction-related earthmoving activities as those of the proposed Project with the potential to impact cultural resources. Overall impacts to cultural resources would be the fewer than those of the proposed Project under Alternative D.

Geology and Soils

Similar to the Project, Alternative D would result in development on the site but with no retail components and with fewer residential rooms. This would result a reduction of the development footprint; however, impacts from strong seismic ground shaking, soil erosion/loss of topsoil and volcanic activity would be the same as the Project. Overall impacts to geology and soils would be the same as the proposed Project under Alternative D.

Hazards and Hazardous Materials

Similar to the Project, Alternative D would result in development on the site but with no retail components and fewer hotel/condominium rooms. Development of Alternative D would require the demolition of all existing building on site and therefore the upset and accidental release of hazardous materials would be the same of that of the proposed Project. In addition, the proposed development would be required to comply with the standards relevant to construction within a wildland fire hazard zone. Overall hazards and hazardous materials impact would be the same as the proposed Project under Alternative D.

Hydrology and Water Quality

Similar to the Project, Alternative D would result in development on the site but with no retail components and fewer hotel/condominium rooms. This would result in reduced building height and the overall development footprint. Therefore, development of Alternative D would result in less construction-related earthmoving activities and would decrease the potential for construction impacts to significantly affect water quality standards. Operational impacts of the Project would likewise be reduced from that compared to the Project due to the reduced development footprint. Impacts from groundwater depletion or recharge, and drainage system capacity would also be less that those of the proposed Project. Similar to the Project, Alternative D would be located entirely outside the 100-year flood zone and this impact would be similar. Overall impacts to hydrology and water quality would be less than those of the proposed Project under Alternative D.

Land Use

Unlike the proposed Project, Alternative D proposes that the development of the Project be within the guidelines of the Specific Plan. Therefore the Project would not exceed the required density, building heights or setbacks. Under Alternative D, density would be 48 RPA for the Resort General (RG) zone, and the 48 RPA for the Specialty Lodging (SL) zone. In addition, the Project's proposed buildings heights would not exceed 50-feet measured from above the underside of the parking garage ceiling and setbacks would not exceed those of the Specific Plan.

Development under Alternative D would not include any retail or commercial land uses and as such would be inconsistent with General Plan and Specific Plan policies that encourage restaurants, retail, entertainment, lodging and other visitor support services. Therefore, while Alternative D would be developed within the height, density and setback standards, the lack of year-round visitor lodging, visitor amenities such as retail, restaurants, personal services, meeting/conference rooms, and recreational facilities would be inconsistent with the overall intent of the Specific Plan. As a result, because the Specific Plan area is intended to be a lively resort area to improve the Town's attractiveness to year-round visitors, Alternative D would introduce an incompatible land use in the Specific Plan area. As such, Alternative D, would be less consistent with applicable land use plans, policies and programs than the proposed Project. Alternative D would require approval of certain discretionary actions by the Town, same as the Project with the exception of requiring any amendments to the Specific Plan. Overall impacts to land use under Alternative D would be greater than those of the proposed Project.

Noise

Alternative D would result in construction activities on the site and would generate less temporary construction equipment noise and groundborne vibration as that under the Project. However, due to the close proximity of adjacent land uses, development of Alternative D would result in significant and unavoidable temporary construction impacts similar to the proposed Project. Operational impacts resulting from traffic-generated noise would be reduced over the Project due to the decrease in vehicle trips resulting from the decrease in the number of residential rooms and the elimination of the retail development on the site. Similar to the Project, Alternative D would not be subject to excessive operational groundborne vibration. Overall impacts to noise under Alternative D would be less than under the Project.

Population and Housing

Alternative D would result in the construction of condominium rooms units only. Similar to the Project, construction of Alternative D would result in the creation of temporary construction jobs and the creation of permanent jobs. Under Alternative D, full-time employee equivalents (FTEE) would be reduced by approximately 54 percent (100 FTEE as opposed to 185 FTEE) and affordable housing would be reduced from 93 rooms to 50 rooms.

Under Alternative D, like the proposed Project, 18 existing residential units located on Site 2 in the North Village Inn and would be removed and would be replaced with up to 222.5 permanent year-round condominium rooms and 25 affordable housing units to realize a total of 248 two-bedroom permanent year-round housing units. In addition, Alternative D would comply with Town Municipal Code 17.52 “Conversion of Existing Residential Facilities.”

Alternative D would result in permanent and seasonal/visitor serving housing when considered cumulatively would increase the Persons At One Time population of the Town (“PAOT”). The PAOT is used as the Town’s threshold to measure population intensity or total peak population, which represents an average winter Saturday and does not reflect the permanent population in the Town. Similar to the proposed Project, the Town would monitor the overall PAOT through the project approval process, and would consider project approvals in the light of existing and projected PAOT, and the other considerations set forth in the General Plan intended to limit total population. Therefore the cumulative population generation under Alternative D would not exceed the anticipated PAOT of 52,000 and would be less than that of the proposed Project.

Under Alternative D, overall impacts to population and housing would be less than those under the Project.

Public Services

Police Service

Similar to the Project, Alternative D would result in development on the site but with no retail component and fewer residential rooms. Alternative D would reduce the temporary increase in population in the Town which results from the influx of construction workers and would also reduce the permanent increase in the population of the Town resulting from the construction of residential rooms, which would attract new visitors and residents requiring police services, than that of the Project. As stated above under heading “Population and Housing,” the overall PAOT would be reduced from that of the proposed Project. As a result, implementation of this alternative would reduce the Project’s significant but mitigable impacts to police protection services. Overall impacts to police services would be less under Alternative D than under the Project.

Fire Protection

Similar to the Project, Alternative D would result in development on the site but with no retail component and fewer residential rooms. Alternative D would reduce the temporary increase in population in the Town which results from the influx of construction workers and would also reduce the permanent increase in the population of the Town resulting from the construction of residential rooms, which would attract new visitors and residents requiring additional demand for fire protection services, than that of the Project. As stated above under the heading “Population and Housing,” the overall PAOT would be reduced from that of the proposed Project. As a result, implementation of this alternative would create

less demand for fire protection services than that of the proposed Project. Overall impacts to fire protection services would be less under Alternative D than under the Project.

School Service

Under Alternative D, there would be more permanent year-round residential land uses on the Project site, and thus, this alternative would increase the additional demand for school services from that of the proposed Project. The number of students generated would be greater than under the Project due to increase in condominium rooms and this impact would be more than under the Project. However, similar to the proposed Project, the development under Alternative D would be required to pay the developer impact fees established by the Mammoth Lakes Unified School District (\$2.63 per square foot of residential development). Pursuant to California Government Code provided in Section 65996, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of these required developer fees, overall impacts to school services would be the same under Alternative D than under the Project.

Parks and Recreation

Under Alternative D, there would be no retail development but more permanent year-round residential land uses on the Project site, and thus, this alternative would increase the number of residents and the visitors generated would be fewer than under the proposed Project. However, the overall PAOT generated by the development of Alternative D would be less than that of the proposed Project; therefore, the demand for parks and recreational services would be reduced. In addition, similar to the proposed Project under Alternative D, on-site permanent residents would be provided separate and private recreational amenities. Overall impacts to park services would be less under Alternative D than under the Project.

Snow Removal Services

Under Alternative D, there would be no retail and fewer residential rooms would be developed; as such, the development footprint would be the smaller than that of the proposed Project. Similar to the Project, the internal roadway system under Alternative D would be privately owned and maintained. The management of snow at the site would be the sole responsibility of Mammoth Crossing property owners or their designated representative association. In addition, the development under Alternative D would be subject to the same standards of the proposed Project and would be required to submit a Snow Management Plan (“SMP”) for approval by the Town and the Mammoth Lakes Fire Protection District. Therefore, implementation of this alternative would result in the same impacts to snow removal services. Overall impacts to snow removal services would be the same under Alternative D than those of the Project.

Traffic and Circulation

Alternative D would result in construction of fewer residential rooms (445 as opposed to 742) and no retail component would be developed. The reduced rooms and no retail component would subsequently reduce the full-time equivalent employees generated, and thus reduce the required affordable housing units required to be developed. Therefore, the number of vehicle trips created under Alternative D would be less than the Project. Alternative D would be accessed at the same points and would have a similar roadway configuration and emergency access as the Project. Parking under Alternative D would be provided under the same ratios as required by the Town Code that the Project would be subject to. Bicycle and pedestrian facilities and transit facilities would be similar to the Project. Vehicle trips from residents of the condominiums could increase as they seek other retail locations in Town due to the removal of the retail component under this alternative. However, overall impacts to transportation and circulation would be less than the Project due to the decrease in vehicle trips created by the reduced residential and retail land uses developed under this alternative.

Utilities

Wastewater

Alternative D would result in the generation of wastewater from residential land uses. Similar to the Project, Alternative D would result in development on the site but with no retail land uses and fewer residential rooms. Therefore, Alternative D would generate less wastewater than the Project due to the reduction in residential uses and impacts from wastewater generation would be less than under the Project. Similar to the Project, Alternative D would require installation of wastewater infrastructure and impacts to wastewater infrastructure would be the same as under the Project. Overall impacts to water wastewater generation and infrastructure would be less than under the Project.

Water Service

Alternative D would result in demand for water supply from residential land uses. Similar to the Project, Alternative D would result in development on the site but with no retail land uses and fewer residential rooms. While the overall number of residential rooms would be reduced the generation of water due to the change in room status (from hotel to condominium) would be greater since condominiums use more water than hotel rooms. However, the elimination of the water demand generated by the retail (40,500 square feet) and hotel/visitor serving (69,150 square feet) amenities would result in an overall decrease demand for water supply than the Project and impacts to water supply would be less than under the Project. Similar to the Project, Alternative D would require installation of water supply infrastructure and impacts to water supply infrastructure would be similar to the proposed Project. Overall impacts to water supply and infrastructure would be less than under the Project.

Electricity

Alternative D would result in demand for electricity from residential land uses. Similar to the Project, Alternative D would result in development on the site but with no retail land uses and fewer residential rooms. While the overall number of residential rooms would be reduced the generation of electricity due to the change in room status (from hotel to condominium) would be greater since condominiums use more electricity than hotel rooms. However, the elimination of the electricity demand generated by the retail (40,500 square feet) and hotel/visitor serving (69,150 square feet) amenities would result in an overall decrease demand for electricity than the Project and impacts to electricity supply would be less than under the Project. Similar to the Project, Alternative D would require installation of electricity supply infrastructure and impacts to electricity supply infrastructure would be the similar to the proposed Project. Overall impacts to electricity supply and infrastructure would be less than under the Project.

Propane

Alternative D would result in demand for propane supply from residential land uses. Similar to the Project, Alternative D would result in development on the site but with no retail land uses and fewer residential rooms. While the overall number of residential rooms would be reduced the generation of water due to the change in room status (from hotel to condominium) would be greater since condominiums use more propane than hotel rooms. However, the elimination of the propane demand generated by the retail (40,500 square feet) and hotel/visitor serving (69,150 square feet) amenities would result in an overall decrease demand for propane supply and impacts to propane supply would be less than under the Project. Similar to the Project, Alternative D would require installation of propane supply infrastructure and impacts to propane supply infrastructure would be the similar to the proposed Project. Overall impacts to propane supply and infrastructure would be less than under the Project.

Relationship of the Alternative to the Proposed Project Objectives

Alternative D would not meet most of the Project objectives intended to create an intensely developed “Town Visitor Core” by redeveloping the underdeveloped parcels within the Specific Plan area to complete development of the North Village, and would not meet the overall intent of the current Specific Plan. Development under Alternative D would produce a design that is appropriate to the character of the Mammoth Lakes region and provide bicycle and pedestrian trail connections to existing trails and other Town-wide circulation systems, so as to complement and enhance the Town-wide trails network. However, under Alternative D there would be no retail or visitor serving amenities, affordable housing would be reduced and no public plaza space would be developed. Alternative D would not provide development that is responsive to the existing and expected future hotel demand within the Town.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6 of the State *CEQA Guidelines* requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the Town. The Project under consideration cannot be identified as the Environmentally Superior Alternative. Additionally, in accordance with State *CEQA Guidelines* Section 15126.6(e)(2), if the Environmentally Superior Alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Table VI-2 summarizes the comparative impacts of each of the alternatives when compared to the Project (the table does not list cumulative impacts). Table VI-2 lists the level of significance of the impacts of the Project to each environmental topic analyzed in Chapter IV of this Draft EIR and illustrates whether the environmental impacts anticipated under each proposed alternative would be lesser, similar, or greater than those of the proposed Project. Table VI-2 provides a comparison of the ability of each alternative to avoid or substantially reduce the significant environmental impacts of the Project. The following is a summary of each alternative and explanation as to how the Environmental Summary was determined.

Alternative A (No Project No Build) would be the Environmentally Superior Alternative because it would not result in significant impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use planning, noise, population and housing, public services, traffic and circulation, and utilities. However as stated above, pursuant to *CEQA Guidelines* Section 15126.6(e), Alternative A cannot be adopted as the Environmentally Superior Alternative. As such, Alternative D would be the Environmentally Superior Alternative because it would reduce impacts from those of the proposed Project with regards to aesthetics, air quality, biological resources, cultural resources, noise, population and housing, public services, traffic and circulation and utilities.

**Table VI-2
Alternatives Impacts Comparison**

Impact Area	Proposed Project	Alternative A No Project No Build	Alternative B No Public Parking	Alternative C On-Site Affordable Housing	Alternative D Existing NVSP Condominium Only
Aesthetics	SU	—	—	+	—
Air Quality	SU	—	—	+	—
Biological Resources	LTS/M	—	=	=	—
Cultural Resources	LTS/M	—	=	=	—
Geology and Soils	LTS/M	—	=	=	=
Hazards and Hazardous Materials	LTS/M	—	=	=	=
Hydrology and Water Quality	LTS/M	—	=	=	=
Land Use and Planning	LTS	—	=	=	+
Noise	LTS/M	—	—	+	—
Population and Housing	LTS	—	=	+	—
Public Services	LTS/M	—	=	+	—
Traffic and Circulation	LTS/M	—	—	+	—
Utilities	LTS/M	—	=	+	—
Key: <i>S</i> = Significant Impact <i>SU</i> = Significant and Unavoidable <i>LTS</i> = Less-than-Significant Impact <i>LTS/M</i> = Less-than-Significant Impact with Mitigation + = Impact greater than the Project = = Impact similar to the Project — = Impact less than the Project					

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