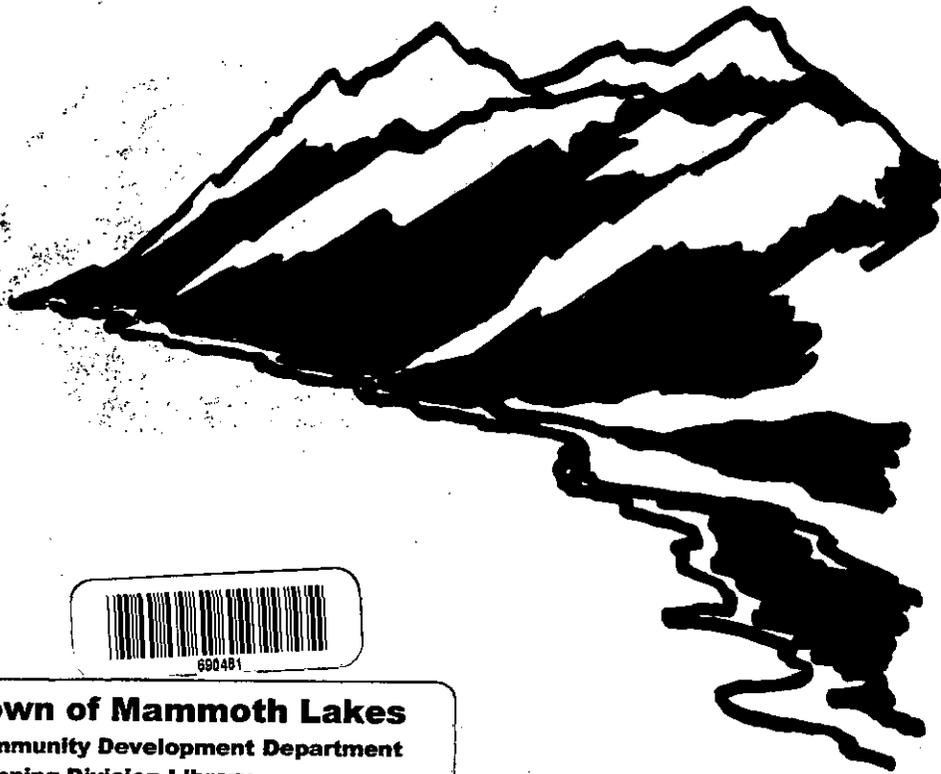




FINAL ENVIRONMENTAL
IMPACT
REPORT
VOL. II
COMMENTS
& RESPONSES
MITIGATION
MONITORING
PROGRAM

EIP
ASSOCIATES

FEBRUARY
1991



690481

Town of Mammoth Lakes
Community Development Department
Planning Division Library

Catalogue Number **26C**

PREPARED FOR THE TOWN OF MAMMOTH LAKES, CALIFORNIA

NORTH VILLAGE

SPECIFIC PLAN
MAMMOTH LAKES, CALIFORNIA

FINAL ENVIRONMENTAL IMPACT REPORT

NORTH VILLAGE SPECIFIC PLAN

Volume II

- A. Revisions to the DEIR**
- B. Comments and Responses**
- C. Mitigation Monitoring Program**

Prepared for:

Town of Mammoth Lakes

Prepared by:

**EIP ASSOCIATES
80 South Lake Avenue
Suite 600
Pasadena, California 91101**

February 1991

A. Revisions to the DEIR

SUMMARY OF REVISIONS TO THE DRAFT EIR

The Final Environmental Impact Report, Volume I, includes the revised Draft Environmental Impact Report. The revisions were made in order to incorporate additional information about the proposed Project. These revisions did not include any changes to the project description. The revisions are presented in Table A, Revisions to the Draft EIR, in order to assist the reader to identify changes in the text.

The strike-out text (~~example~~) indicates deletions to the initial Draft EIR (December 1990), and the shaded text (example) indicates additions which are reflected in Volume I of the Final EIR.

Table A

**Revisions to the Draft Environmental Impact Report
Summary of Environmental Impacts
and Mitigation Measures**

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.1 Geology, Soils, and Seismicity			
4.1-1 If the project were implemented as proposed, it could create new or increased slope instability. This is a <i>potentially significant impact</i> .	LS	4.1-1(a) <i>Project Sponsors shall complete the soils and foundation analyses and incorporate the recommendations of those analyses in the project design. Soils and foundation analyses shall be approved by the Public Works Director prior to final project design approval, as stipulated in the standards of the Town's Safety Policy #18. All measures required by the Public Works Director shall be incorporated into grading plans and building plans.</i> 4.1-1(b) <i>New slopes shall be constructed at an angle and degree of compaction that will ensure stability, as stipulated in the standards of the Town's Municipal Code.</i> 4.1-1(c) <i>All work shall be overseen by a licensed civil engineer, certified engineering geologist (CEG) or similar appropriately qualified professional, who shall report to the Town in order to ensure the standards of the applicable codes are met.</i> 4.1-1(d) <i>Any impacts resulting from any of the above measures not analyzed by this EIR shall be subject to further environmental review and approval by the Planning Commission prior to approval of the final project design.</i>	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant
 #

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.1-2 If the project were implemented as proposed, it could create new or increased soil erosion. This is a <i>potentially significant impact</i> .	PS	4.1-2 The Project Sponsor shall prepare a <i>A comprehensive Erosion and Sediment Transport Control Plan shall be prepared and approved by the Town prior to issuance of any grading or building permit. The Plan shall be included in the Project design, as stipulated in the Town's Safety Policy #18. The Plan shall also meet the requirements of the Regional Water Quality Control Board and the Town Municipal Code.</i>	LS
4.1-3 If the project were implemented as proposed, it could significantly alter the topography of the site. This is an <i>unavoidable significant impact</i> .	S	4.1-3 The Project Sponsor shall complete the geotechnical studies and incorporate their recommendations in the project design, as stipulated in the Town's Safety Policy #26. All structures shall be designed and built to at least the standards of UBC Seismic Zone 4. <i>Prior to issuance of grading or building permits, geotechnical studies shall be completed and their recommendations shall be incorporated in the Project design, as stipulated in the Town's Safety Policy #26.</i>	LS
4.1-4 If the Project were implemented as proposed, it would increase the number of people living in and visiting an area subject to seismic activity. This is a <i>less-than-significant impact</i> .	LS	4.1-4 4.1-4a The plan includes improvements on Lake Mary, Lakeview and Minaret roads; these would provide residents of the Slopes subdivision with improved travel routes to both of the escape routes leading out of the town. The Project Sponsor shall complete the geotechnical studies and incorporate their recommendations in the project design, as stipulated in the Town's Safety Policy #26. All structures shall be designed and built to at least the standards of UBC Seismic Zone 4.	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>4.1-4b The Town shall seek developers' cooperation in designing and disseminating information to assist citizens and visitors in responding to emergency situations that are likely to arise (Safety Policy #31).</i>	
4.1-5 If the project were implemented as proposed, it would increase the number of people living in and visiting an area subject to volcanic activity.	LS PS	<p>4.1-5(a) The Plan includes improvements on Lake Mary, Lakeview and Minaret Roads; these would provide residents of the slopes subdivision with improved travel routes to both of the evacuation routes leading out of the town.</p> <p>4.1-5(b) The developer shall cooperate with the Town in designing and disseminating information to assist citizens and visitors in responding to emergency situations that are likely to arise (Safety Policy #31). All structures shall be designed and built to at least the standards of UBC Seismic Zone 4.</p>	LS

4.2 Hydrology and Water Quality

4.2-1 Development under the Specific Plan will substantially increase and intensify development, thus increasing surface runoff from the Plan area. This is a <i>potentially significant impact</i> .	PS	<p>4.2-1(a) Modifications and improvements to existing drainage systems will be undertaken so as to provide adequate drainage for new development and so as not to exceed the existing capacity of the downstream system. In particular, the North Village Drainage Plan will be evaluated for adequacy to ensure that drainage improvements provided will not create localized flooding problems within the Plan area or downstream. All drainage improvements and erosion control structures shall be subject to approval of the Town's Public Works Department. Proper maintenance of all</p>	LS
---	----	---	----

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>drainage channels and detention basins should be ensured.</i>	
	4.2-1(a)	<i>A more complete hydrology analysis for design purposes shall be required to be completed to estimate the amounts of runoff which would be required to be retained onsite.</i>	
	4.2-1(b)	<i>The Regional Water Control Board requires that drainage collection or retention and infiltration facilities must be constructed to prevent transport of the runoff from a 20 year, one hour storm from the project site. On a project by project basis, the developer shall be required to install off site retention basins, infiltration basins, infiltration systems, or improvements to the drainage system downstream of the project site if development results in an over capacity of the system. The ultimate goal should be no net increase in ponding or flooding and not net increase in peak discharge into Mammoth Creek or Murphy Gulch.</i>	
	4.2-1(b)	<i>Runoff control shall be designed to meet the Lahontan Regional Water Quality Control Board's requirements and must be approved by the Town prior to issuance of any grading permits. Design shall be to the standards of the Storm Drain Master Plan.</i>	
	4.2-1(c)	<i>The amount of surface runoff can be reduced by the incorporation of water conservation</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<p>measures into project elements. During the design of individual components of the Plan the following measures should be included within the project design:</p> <p>4.2-1(c) <i>The following water conservation procedures shall be incorporated into project elements where feasible:</i></p> <ul style="list-style-type: none"> ■ <i>Landscape with low water-using plants;</i> ■ <i>Install efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Use irrigation equipment such as drip irrigation, soil moisture sensors, and automatic irrigation systems; and</i> ■ <i>Use pervious paving material wherever whenever feasible, but particularly in large plaza areas, to minimize impervious surface and absorb runoff.</i> 	
4.2-2 Quality of groundwater would not be affected by project construction activities, and will not result in significant impacts to groundwater quality or quantity.	LS	4.2-2 <i>No mitigation measures required.</i>	LS
4.2-3 The quality of surface runoff could be degraded as a result of development. This is a <i>potentially significant impact.</i>	PS	4.2-3(a) To maintain the existing quality of surface and ground waters, the following should be implemented on a project basis: For each individual project considered under this development concept, disturbance of soil	LS

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		requires a Waste Discharge Report to be filed with the Lahontan Regional Water Quality Control Board and a Waste Discharge Permit to be issued for the project to ensure that proper control measures for the protection of water quality are taken and adhered to during all phases of the project.	
	4.2.3(b)	See Mitigation Measure 4.1.2. <i>Erosion control measures, as outlined in the Lahontan Regional Water Quality Control Board's "Guidelines for Erosion Control in the Mammoth Lakes Area" (attached as Appendix C) should be included in all construction specifications.</i> <i>Commercial parking lots and residential streets should be swept regularly to reduce the collection of litter and silt. Oil and grease separators should be installed in the inlets of catch basins, where necessary, to minimize pollution of surface runoff in Murphy Gulch and Mammoth Creek. The separators should be maintained regularly (at least twice per year) to ensure efficient pollution removal.</i> <i>Modifications and improvements to the existing drainage system should be undertaken in a timely fashion with occurring development on a project basis. Infiltration or other off-site retention basins, as described under mitigation</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.3 Biological Resources			
4.3-1 As presently conceived in the North Village Specific Plan, the recreational and commercial developments proposed for this site would result in the alteration or elimination of most of the scattered native vegetation and wildlife resources presently on the property. Cover may actually be increased in some areas as a result of landscape planting; however, this increase may not increase habitat values since the replacement vegetation would be "urban" and represents a loss of plant species diversity. This would be considered a <i>potentially significant impact of the Project.</i>	PS	4.3.1(a) <i>The project shall preserve existing native vegetation to the maximum extent feasible. Landscaping shall emphasize the use of native plants indigenous to the Jeffrey Pine-Fir Forest, Sagebrush Scrub, and Riparian plant communities. Whenever possible native plants used onsite shall be selected for their replacement habitat value. Site designs shall be subject to the Design Review procedure of the Town.</i>	LS
		4.3.1(b) <i>All trees greater than 12 inches dbh (diameter breast height) and significant stands on the Project site shall be mapped prior to issuance of grading permits or clearing. A registered forester or arborist shall then determine the age and condition of these trees and whether they should be retained or removed based upon health and visual significance of the trees, except for removal required by approved improvements. Once this determination is made those trees should be retained and integrated into the design of the Project. A program of specific protection measures shall be prepared by the developer and approved by the Town prior to issuance of any construction permits (e.g., construction fencing, grading controls, grading design, etc.). Any trees removed unavoidably by the final Project approval shall</i>	

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>be in accordance with Town policies. Off-site replacement will need the approval of the Town Planning Director.</i>	
		4.3-1(c)(b) <i>Construction and site development, such as grading and trenching, shall be prohibited within the dripline of retained trees. Equipment should shall not be stored or driven under trees. Grading shall not cover the ground surface within the dripline of existing trees. Grading limits should shall be clearly defined and protected.</i>	
		4.3-1(d)(e) <i>Landscape materials should shall be used that allow for the protection and preservation of existing trees. Native plant species, preferably from seed or cuttings from local plants, should be used where possible. The Landscape Plan shall be approved by the Planning Director prior to issuance of any construction permits.</i>	
		4.3-1(e) <i>Irrigation, fertilization, and other landscape management practices should shall be designed to minimize effects on existing trees and other vegetation.</i>	
		4.3-1(f) <i>Proper disposal methods for all coniferous slash shall be used in order to prevent the spread of bark beetles.</i>	
4.3-2 The proposed project will result in a change in vegetation from conifer forest to urban development within portions of undisturbed	PS	4.3-2 Implement Mitigation Measure 4.3-1 above.	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>vegetation. As in the case of changes in vegetation cover, this change in vegetation will likely result in a lowering of habitat values. The change must be considered <i>a potentially less-than-significant effect of the proposed project due to the fragmented nature of the habitat.</i></p>			
<p>4.3-3 Any loss of a plant species of concern would be considered significant. Field surveys done in late June, 1990, a time of flowering for all species of concern, failed to find any of the six species of concern. As a result it is expected that there will be <i>no significant adverse effects</i> on any species of concern.</p>	LS	4.3-3 <i>None mitigation measures required.</i>	LS
<p>4.3-4 Development of the project would result in the loss of 25 acres of fragmented native wildlife habitat. This is a <i>potentially less-than-significant impact.</i></p>	LS PS	4.3-4(s) <i>To retain wildlife values, as much native vegetation as possible shall be retained and protected during construction. A Revegetation Plan, prepared by a qualified botanist and approved by the Town of Mammoth Lakes, should shall be completed prior to the commencement of the project which will describe in detail the species of trees and shrubs which will be used, where they will be planted, and in what numbers, and the methods of planting and maintenance which will ensure successful growth. It shall include a monitoring program to follow the progress of new plantings and ensure replacement of unsuccessful plants. Landscaping with native species of trees and shrubs should be undertaken to enhance wildlife use of cleared areas. Any trees removed unavoidably by the final Project approval shall</i>	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>be replaced on a one-to-one basis on- or off-site. Off-site replacement will need the approval of the Town Planning Director.</i>	
		4.3-4(b) <i>Under the recently enacted AB 3180, once mitigation plans designed to offset habitat losses are approved and the specific areas where they will be located are identified, the proponent must provide a program to monitor their progress for a period of time (usually three to five years) deemed sufficient by the Planning Director to assure their successful development. Adequate security shall be deposited with the Town to ensure successful implementation of this measure.</i>	
4.3-5 Disturbances and disruptions during project construction scatter/disperse and fragment existing wildlife communities onsite, forcing survivors into already occupied habitats to cause cumulative negative impacts on all wildlife in the area. This is a potentially significant impact.	PS	4.3-5 Under the recently enacted AB 3180, once mitigation plans designed to offset habitat losses are approved and the specific areas where they will be located are identified, the proponent must provide a program to monitor their progress for a period of time (usually three to five years) deemed sufficient to assure their successful development.	LS
		4.3-5 <i>All construction activities, including movement and storage of vehicles and the storage of building and other materials, shall be confined to areas slated for development. Care shall be taken during construction to avoid damage to vegetation and habitats not directly involved in project construction. Any damaged vegetation shall be replaced on a one-to-one basis on- or</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>off-site. Off-site replacement will need the approval of the Town Planning Director.</i>	
4.3-6 Increased erosion and siltation as a result of construction and grading activities could alter vegetation in the project area. This is a <i>potentially significant impact.</i>	PS	4.3-6 To prevent erosion and siltation into intermittent creeks, areas cleared of vegetation, fill or other materials should be stabilized after clearing and grading. Hay bales, silt screens or similar devices should be used to prevent siltation. To further protect the drainage system and prevent erosion, all grading and construction should be completed during the summer months or, after October 15 of each year, be in a condition to be stabilized within 48 hours should inclement weather threaten.	LS
4.4 Land Use and Planning			
4.4-1 The visual impact of the high-speed Gondola swaying over a 20-foot easement over the within a residential population area may not be a desirable feature. This is considered to be a <i>significant impact.</i>	S	4.4-1 A final assessment shall be made by the North Village Design Review Committee and shall be favorably ruled by the Planning Commission on the approval of land right-of-way. This shall be conducted immediately, as it could affect the timing of the first phase of development.	LS SU
		4.4-1(a) The height of the proposed gondola should be maintained at or near a maximum of 90 feet (just below the tree line), in order to protect views from adjacent residential buildings.	
		4.4-1(b) To the maximum extent feasible existing trees located along the gondola easement shall be retained. Replacement trees, in addition to	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

**TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.4-1(c)	
		4.4-2	LS
4.4-2	S	<p><i>those existing, shall be planted adjacent to the gondola easement (with property owner approval) in order to create a buffer that will protect privacy and minimize visual impacts on affected properties.</i></p> <p><i>Natural, earth-tone colors and non-glare, non-reflective materials shall be used for the gondola towers and cabins.</i></p> <p><i>The Architectural Guidelines of the North Village Specific Plan shall be followed to avoid the cumulative loss of sun exposure, incorporate height constraints, improve architectural image, establish setbacks and implement other design issues.</i></p>	LS
4.4-2	PS	<p style="text-align: center;">4.4-3</p> <p style="text-align: center;">4.4-2</p> <p><i>The North Village Specific Plan suggests a specific schedule of development and specific mix of uses to prevent a worst case scenario from happening. A carefully-phased development plan shall help to preclude market saturation, as the success of the North Village's economic climate is as essential as it is critical to the vitality of the Town of Mammoth Lakes. Modification of the phasing plan shall be approved by the Planning Department Commission of the Town of Mammoth Lakes. Modification of use permitted shall be subject to Town Council determination as part of the approval process of this Specific Plan or any future modification.</i></p>	LS
4.4-3	PS	<p><i>The proposed project would create significant changes in the existing physical land use patterns and demands both in the project area and throughout the commercial areas of Mammoth Lakes. This is considered to be a potentially-significant impact.</i></p>	LS

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.4-4 4.4-3 The proposed project represents a much more intense use of the land than the existing zoning and present use. This is considered to be a potentially-significant impact.	PS	4.4-4 4.4-3 <i>Prior to every development phase of the proposed project, the plan for that proposed phase shall be submitted to the Town of Mammoth Lakes, North Village Design Review Committee and the North Village Association for approval of transition of uses between new urban development and existing adjacent uses.</i>	LS
4.4-5 4.4-4 The proposed project represents an opportunity to see infill development of existing land areas. This is <i>not a significant impact</i> .	B	4.4-5 4.4-4 <i>None required.</i>	LS
4.4-6 4.4-5 The proposed project would meet a part of the increased demand for visitor accommodations in Mammoth Lakes. An increasing demand would be established as the project becomes a year-round recreational facility of the Mammoth region. This is <i>not a significant impact</i> .	B	4.4-6 4.4-5 <i>None required.</i>	LS
4.4-7 4.4-6 The proposed project is anticipated to generate a peak population of 2,300 people onsite. These visitors would contribute to the economic base by means of expenditures for accommodations, ski lift tickets, ski rentals, food, services and other goods. The proposed development is designed more to capture potential new market demand by business and guided town groups than to answer the existing demand. This is not a significant impact.	B	4.4-7 4.4-6 <i>None required.</i>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.4-8 4.4-7 The proposed project would promote property tax bases on 1 percent of the assessed value which would amount to about \$1 million annually after build-out. These new tax revenues to Mono County and the Town of Mammoth Lakes would be generated by the hotels and commercial sales. This is not a significant impact.	B	4.4-8 4.4-7 <i>None required.</i>	LS
4.4-9 4.4-8 The proposed project would be consistent with the General Plan Land Use Element which considers the Minaret Commercial District, an activity node, and a site for Specific Plan Planning Opportunities. This is not a significant impact.	B	4.4-9 4.4-8 <i>None required.</i>	LS
4.4-10 4.4-9 The proposed North Village Specific Plan would be consistent with the Town of Mammoth Lakes General Plan with the exception of minor changes in land use designations from residential to commercial and Circulation Element changes which permit the rerouting of Canyon Boulevard (see Traffic impacts). This is not a significant impact.	B	4.4-10 4.4-9 <i>None required.</i>	
<u>4.5 Jobs/Housing Relationship</u>			
4.5-1 As presented in Table 4.5-6 (in section 4.5), the proposed North Village Specific Plan could potentially generate 1,612 permanent on-site jobs	B	4.5-1 <i>None mitigation measures are required.</i>	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation		Mitigation Measures	Level of Significance With Mitigation
<p><i>and 169 106 temporary construction-related jobs. This is a beneficial impact.</i></p>				
<p>4.5.2 Employment created from the hotel and commercial development in the North Village Specific Plan area will increase the population of the Town of Mammoth Lakes and its surrounding area by as much as 2,828 people, with an accompanying housing demand of 1,230 units. This is a significant impact.</p>	S	4.5.2(a)	<p><i>100 percent of the housing for employees generated by uses within the project shall be provided onsite, including affordable employee housing based upon Health and Safety code section 50079.5 and 50105 criteria unless the Town Council allows a portion of this housing need off-site; through an in-lieu fee, or equivalent program. If the Town adopts an employee affordable housing program requiring on- or off-site housing or in-lieu fees prior to any phase of development, provision of housing in accordance with that ordinance shall constitute adequate mitigation.</i></p>	LS
		4.5.2(b)	<p><i>Any housing constructed off-site should be subject to further environmental review to insure that significant or cumulative environmental effects are mitigated on a site specific basis.</i></p>	
		4.5.2(c)	<p><i>Employee housing or an in-lieu fee or equivalent program as approved by the Town Council should be in place prior to or concurrent with the non-residential development generating the need for such housing.</i></p>	

4.6 Utilities

WATER

S = Significant SU = Significant Unavoidable B = Beneficial
 LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.6-1 The Mammoth County Water District reports that the proposed project would have an estimated total water demand of 200,000 gallons per day, which is equivalent to 218 acre-feet per year. This is less than a <i>potentially significant impact</i> .	LS PS	4.6-1 <i>The project operations will have to comply with all MCWD water conservation restrictions. In addition, the project should use:</i> <ul style="list-style-type: none"> • <i>ultra-low flow plumbing fixtures</i> • <i>native and/or drought-tolerant landscaping</i> • <i>reclaimed water where feasible</i> 	LS
4.6-2 This does not account for the The cumulative impacts of other development projects proposed for Mammoth Lakes Cumulative development would shall increase consumption to approximately 5,946 acre-feet. The cumulative impact of buildout under the Mammoth Lakes General Plan will require the prompt development of the Dry Creek wells and other sources as developed by MCWD. This is a potentially significant impact.	PS	4.6-2(a) <i>The project proponent shall contribute "fair share" mitigation fees, as determined by the Mammoth County Water District, for expanded facilities needed to serve cumulative development demands.</i> 4.6-2(b) <i>In the event that additional supplies are not developed in a timely fashion, development shall be deferred pending availability existence of adequate water resources and facilities as determined by MCWD.</i>	LS
WASTEWATER			
4.6-3 The proposed project is anticipated to generate a total of approximately 459,100 gallons of wastewater per day, made up of 60,000 gallons per day (gpd) from residential uses (condos), 19,100 gpd from the retail space, 300,000 gpd from the hotel rooms (based upon full occupancy), and 80,000 gpd from restaurant uses. Since MCWD has adequate treatment capacity for project-generated wastewater flows, the	LS	4.6-3 None required. <i>The Project shall comply with all requirements of Mammoth County Water District regarding flow reduction and sewer system design and operation.</i>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>proposed project would have a less-than-significant impact on wastewater facilities. <i>This is a less-than-significant impact.</i></p>			
<p>4.6-4 New, or rerouted, sewer lines will be necessary to serve the project. Construction and operation of any sewage lines connecting with the MCWD facilities are contingent upon obtaining a Sewer Permit from the MCWD District Manager in accordance with Division 5 of the MCWD Sanitary Sewer Service Code. All additions and rerouting will occur within existing or proposed street rights-of-way, at the time of street construction. Therefore, <i>this is a less-than-significant impact.</i></p>	LS	<p>4.6-4 <i>None required.</i></p>	LS
SOLID WASTE			
<p>4.6-5 The project is anticipated to produce a total of 35,340 pounds of solid waste per day, made up of 1,440 pounds per day from all residences and 33,900 pounds per day from all commercial operations. The Mammoth Disposal Company has indicated that it has adequate collection facilities to serve the project. The Benton Crossing Landfill has another 19 years of capacity and, thus, has adequate capacity to serve the proposed development. <i>Thus, the project would have a less-than-significant impact on solid waste collection and disposal facilities.</i></p>	LS	<p>4.6-5(a) <i>A source reduction program should be prepared by the applicant for the project, emphasizing use of recyclables and reusable materials. 4.6-5(b) Alternate methods of solid waste disposal, such as the use of onsite trash compaction, shall be considered incorporated into the final Project design subject to the approval of the Air Pollution Control Board and Mammoth Lakes Planning Department.</i></p>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.6-5(b) <i>All visible trash collection facilities and features of the development shall be designed to complement the Project design scheme.</i>	
		4.6-5(c) <i>Recycling facilities shall be located at all hotels, commercial, and multi-family projects.</i>	
		4.6-5(c) <i>The Project applicant shall provide a recycling collection station or contract a solid waste disposal company which will offer a system of convenient recycling stations for Project residents. Placement and design shall be subject to the review and approval of the Planning Director.</i>	
		4.6-5(d) <i>The Project applicant shall provide each residence with a divided cabinet suitable for aluminum cans, glass bottles, and plastic bottles.</i>	
ELECTRICITY			
4.6-6 Southern California Edison (SCE) supplies the Town of Mammoth Lakes with its electricity. Based on current project plans, it is estimated that 20,415,200 kilowatt hours will be used by the development annually. Not enough is known to project electricity consumption of the gondola, though it is not expected to be significant. Currently, SCE has the infrastructure in place to handle overall project demand, thus the project would have a <i>less-than-significant-impact</i> .	LS	4.6-6 <i>None mitigation measures are required.</i>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
TELEPHONE			
4.6-7 Continental Telephone (ConTel) supplies the Town of Mammoth Lakes with telephone service. It is estimated, based on project descriptions, that approximately 2,700 phone lines will be needed. ConTel has the infrastructure in place to meet this demand. Therefore, the project would have a <i>less-than-significant impact</i> .	LS	4.6-7 <i>None mitigation measures are required.</i>	LS
4.7 Traffic			
4.7-1 Table 4.7.5 The Level of Service analysis for roadways indicated that the following segments would operate at LOS "F" under cumulative conditions:	PS	4.7-1 Roadway Improvements	PS
<p>Minaret Road - Main Street to Forest Trail</p> <ul style="list-style-type: none"> ■ Lake Mary Road/Lakeview Road to Minaret Road ■ Main Street/Minaret Road to Sierra Boulevard ■ Minaret Road/Old Mammoth Road to Chateau Road ■ Minaret Road/Chateau Road to Meridian Boulevard ■ Minaret Road/Meridian Boulevard to Main Street ■ Old Mammoth Road/Chateau Road to Meridian Boulevard ■ Old Mammoth Road/Meridian Boulevard to Main Street <p>Main Street from Forest Trail to Old Mammoth Road and Minaret Road from Main Street to Forest Trail would operate at LOS "D".</p>		<p><u>Minaret Road (Main Street/Lake Mary Road to south of Old Mammoth Road)</u> - Widen Minaret Road from Main Street/Lake Mary Road to south of Old Mammoth Road to provide four through travel lanes. This improvement would be consistent with the Town of Mammoth Lakes General Plan, which designates Minaret Road as an arterial.</p> <p><u>Old Mammoth Road (Main Street to south of Chateau Road)</u> - Widen or re-stripe Old Mammoth Road from Main Street to south of Chateau Road to provide four travel lanes while maintaining the existing continuous left-turn lane.</p> <p><u>Lake Mary Road (Main Street to Lakeview Road)</u> - Widen Lake Mary Road between Main Street and Lakeview Road to provide four travel lanes. The westbound through lane in this road segment would</p>	
S = Significant	SU = Significant Unavoidable	B = Beneficial	
LS = Less Than Significant	PS = Potentially Significant	NA = Not Applicable	

**TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>4.7-2 The segments on Minaret Road from Chateau Road to Meridian Boulevard would operate at LOS "D", Lake Mary Road from Lakeview Road to Minaret Road and Minaret Road from Meridian Boulevard to Main Street would operate at LOS "E". All other roadway segments studied would operate at LOS "C" or better. A review of Table 4.7.8 reveals the following Level of Service deficiencies:</p> <p>The results presented in Table 4.7.6 indicate that the following intersections would operate at an unacceptable Level of Service:</p> <ul style="list-style-type: none"> — The unsignalized intersections of Minaret Road/Forest Trail and Sierra Boulevard/Main Street would operate at LOS "E"; ■ The unsignalized intersections of Sierra Boulevard/Main Street and Minaret Road/Old Mammoth Road would operate at LOS "F"; — The unsignalized intersections of Minaret Road/Canyon Boulevard, Lakeview Road/Lake 	<p>PS</p>	<p><i>become an exclusive right-turn lane at the intersection with Lakeview Road.</i></p> <p><i><u>Main Street (Sierra Boulevard to Minaret Road) - Provide a two-way continuous left-turn lane in the median by widening Main Street between Sierra Boulevard and Minaret Road. This would be consistent with the existing two-way continuous left-turn lane east of Sierra Boulevard.</u></i></p> <p>4.7-2 <i>Intersection Improvements</i></p> <p><i>The following intersection improvements recommended to mitigate cumulative plus project conditions are in conjunction with the roadway improvements described above.</i></p> <p><i><u>Minaret Road/Forest Trail - These improvements would be in addition to the improvements proposed as part of the North Village Specific Plan circulation plan. Widen Minaret Road just north of Forest Trail to provide two southbound lanes, resulting in one left-turn lane, one through lane and a through/right-turn lane on the southbound Minaret approach to Forest Trail. Provide north-south protected/permissive left-turn phasing. Restripe the eastbound approach to provide a right turn lane and provide a right-turn overlap phase. Restripe the westbound approach (widened as part of the North Village Specific Plan improvements) for a left-turn lane and a through/right-turn lane.</u></i></p>	<p>PS</p>

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>Mary Road, and Minaret Road/Old Mammoth Road would operate at LOS "F";</p> <ul style="list-style-type: none"> ■ The signalized intersection of Lakeview Road/Lake Mary Road would operate at LOS "E"; — The signalized intersections of Old Mammoth Road/Main Street and Minaret Road/Meridian Boulevard would operate at LOS "E"; ■ The following signalized intersections would operate at LOS "F": <ul style="list-style-type: none"> - Minaret Road/Forest Trail - Minaret Road/Main Street - Minaret Road/Meridian Boulevard - Old Mammoth Road/Main Street - Old Mammoth Road/Meridian Boulevard 		<p><i><u>Lakeview Road/Lake Mary Road</u> - Restripe the eastbound Lake Mary Road approach to provide one left-turn lane and one through lane (which would be the second eastbound through lane recommended as part of the Lake Mary Road widening east of Lakeview Road); widen the westbound Lake Mary Road approach to provide one through lane and one right-turn lane (which would be the second westbound through lane recommended as part of the Lake Mary Road widening east of Lakeview Road) and restripe the southbound Lakeview Road approach to provide one left-turn lane and one shared left/right-turn lane. These improvements would be in addition to the installation of a traffic signal, widening and grade reductions proposed in the North Village Specific Plan Circulation Plan.</i></p> <p><i><u>Minaret Road/Main Street/Lake Mary Road</u> - Widen the northbound Minaret Road approach to provide a right-turn lane. Widen the southbound approach to provide the following configuration: two left-turn lanes, one through lane, and one through/right-turn lane. Restripe the westbound approach to provide a second left-turn lane. Provide eight-phase signal operation by modifying the northbound and southbound from split phasing to protected left-turn phasing.</i></p> <p><i><u>Sierra Boulevard/Main Street</u> - Restripe Main Street to provide a left-turn lane on the eastbound approach (in conjunction with the recommended widening of Main Street to provide a two-way</i></p>	

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
--------	---	------------------------	--

continuous left-turn lane). This would remove turning vehicles from the through traffic lanes and thus improve the overall operation of the intersection. Also, restripe the southbound approach to provide a left-turn lane and a right-turn lane. This would reduce the delay to right turning traffic caused by vehicles waiting to turn left from a single approach lane. The intersection comes very close to meeting signal warrants with the projected traffic and should be monitored periodically to determine if the actual future volumes or accident incidence warrant the installation of a signal.

Old Mammoth Road/Main Street - Restripe the northbound approach to provide one left-turn lane and one shared left/right-turn lane. The two-lane southbound departure should be modified to provide for a continuous eastbound to southbound movement. Traffic turning left from the westbound approach would be able to turn into the other southbound departure lane.

Minaret Road/Meridian Boulevard - Widen both the northbound and southbound Minaret Road approaches to provide one left-turn lane, one through lane, and one through/right-turn lane on each approach. Widen the eastbound approach to provide a right-turn lane with a right turn overlap. Provide left-turn lanes on the eastbound and westbound Meridian approaches.

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
--------	---	------------------------	--

Old Mammoth Road/Meridian Boulevard - Widen the northbound and southbound Old Mammoth approaches to provide one left-turn lane, two through lanes, and one right turn lane.

Minaret Road/Old Mammoth Road - This intersection will satisfy traffic signal warrants under cumulative conditions. Install an eight-phase traffic signal, with protected left-turns on all approaches. Widen the northbound and southbound Minaret approaches to provide one left-turn lane. Two through lanes and one right-turn lane. Widen the westbound approach to provide two left-turn lanes, one through lane and one right-turn lane; widen the eastbound approach and departure to provide one left-turn through lane, one through lane, and one right-turn lane. The additional eastbound through lane should be extended approximately 300 feet past the intersection and the two through lanes could then transition back into one lane.

4.8 Air Quality

Construction

<p>4.8-1 Clearing, excavation and grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed earth surfaces generate dust. Therefore, Construction in the area of the proposed site will temporarily increase PM10 concentrations and could lead to violations of the federal and State 24-hour average PM10 standards. It is not possible to estimate</p>	PS	<p>4.8-1(a) <i>To reduce the potential for nuisance due to dust and odors, all construction contracts shall require watering twice daily with complete site coverage; the frequency of watering shall increase as necessary to minimize dust if wind speeds exceed 15 mph. Dust emissions related to construction can be reduced approximately 50 percent by watering exposed earth surfaces during excavation, grading and construction</i></p>	LS
---	----	--	----

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>accurately the PM10 concentrations that would occur at or adjacent to the construction sites because such concentrations are very sensitive to local meteorology and topography, to variations in soil silt and moisture content, and to the level of equipment use. However, EPA measurements made during apartment and shopping center construction provide a rough indication of the maximum rate of particulate emissions. These measurements indicate that approximately 1,089 kg (1.2 tons) of dust are emitted per acre per month of construction activity. One half of the dust would be comprised of large particles (i.e. diameter greater than 10 microns) which settle out rapidly on nearby horizontal surfaces and are easily filtered by human breathing passages. This dust is of concern as a soiling nuisance rather than a health hazard. The remaining fraction (PM10) could be sufficient to violate the federal and State PM10 standards in the site vicinity. This is a <i>potentially significant impact</i>.</p> <p>Construction vehicles/equipment would emit exhaust at the construction sites. Large numbers of such vehicle/equipment operating or idling in a small area may cause spot violations of the CO standards. Odors of construction equipment exhaust would probably be noticeable in the environs of the project site for the duration of construction.</p>		<p><i>activities. Conditions of approval should also require daily cleanup of mud and dust carried onto street surfaces by construction vehicles. Throughout construction activities, haul trucks should use tarpaulins or other effective covers. Upon completion of construction, contractors should take measures to reduce wind erosion. Replanting and repaving should be completed as soon as possible. Construction activities should be scheduled so that they do not contribute to peak periods of woodburning and vehicular traffic, previously discussed as major contributors to PM10 exceedances.</i></p> <p>4.8-1(b) <i>Drift fencing tackifiers and covering of stockpiles shall be used in areas not under active construction.</i></p>	
4.8.2 Operation of construction vehicles and equipment during the construction phase of the proposed Project could result in violations of federal and	PS	4.8-2 To reduce the potential of spot violations of the CO standards and odors from construction equipment	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>State 1-hour and 8-hour CO standards. This is a short-term, potentially significant impact during the construction phase of the proposed Project only.</p>		<p>exhaust, unnecessary idling of construction equipment should shall be avoided.</p>	
<p>Traffic Carbon Monoxide "Hot Spots" 4.8-3 Operational impacts for the proposed project include Emissions from vehicular traffic generated by the proposed Project By generating additional traffic in the Town of Mammoth Lakes, the proposed project would affect local traffic patterns and, thereby, change the local spatial and temporal distributions of ambient CO. Local air quality effects were estimated by using the CALINE4 air pollutant dispersion model to determine if the proposed project would cause any exceedance of the 1-hour or 8-hour federal or State standards. The State 1-hour and 8-hour standards, given in Table 4.8-1, are 10.0 ppm and 9.0 ppm respectively, could result in violations of federal and State ambient quality standards. This is a <i>potentially significant impact</i>.</p>	PS	<p>4.8-3 Carbon Monoxide "Hot Spots" Mitigation of exposure to CO levels exceeding the 8-hour standard at the Minaret and Main intersection could be accomplished by establishing an easement within 50 feet of the intersection. Development will not be allowed within 50 feet of the Old Mammoth and Main intersection, and therefore the potential for exposure of individuals to elevated CO concentrations is very low. This mitigation measure would reduce this impact to a less than significant impact through T.D.M., as outlined in the Traffic (4.7-32) section of this EIR.</p>	LS
<p>PM10 EMISSIONS 4.8-4 Project Resuspended road cinders and vehicle tail pipe and tire wear will contribute approximately 2,365 1,400 kg/day to the total PM10 emissions inventory at buildout of the proposed Project. Resuspended road cinders contributed to 99 percent of the projected PM10 emissions from vehicular sources. In the year 2005 the proposed project would contribute approximately 44 percent of the daily emissions of PM10 from vehicular sources.</p>	S	<p>4.8-4 Mitigation measures related to reducing PM10 emissions from vehicular sources have been outlined in Table 4.8-3. Two mitigation measures targeted toward reducing traffic-related PM10 emissions are: 1) use of vacuum street sweepers to pick up cinders and road dust, and 2) reduction in vehicle traffic through Transportation Demand Management outlined in section 4.7-32. Reductions in vehicle traffic are aimed at reducing reentrainment of cinders</p>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
 LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>Likewise, if the reductions from Table 4.8-3 are not implemented, the proposed project would increase annual PM10 emissions by 98 percent above the cumulative annual emissions from vehicular sources. Because the proposed project is in a non-attainment area for PM10, any increase in emissions of this pollutant would be a significant impact on air quality. Therefore, the proposed project would have a significant impact on air quality with respect to PM10 emissions from vehicular sources.</p> <p>Traffic-related PM10 emissions were calculated using the same methodology as described in the Draft AQMP for Mammoth Lakes, Sections 3.2 and 3.3. Projected peak 24-hour PM10 emissions for the year 2005 were taken from Table 5.2 of the Draft AQMP for Mammoth Lakes. Traffic generated by the proposed project was estimated at 104,650 Vehicle-Kilometers Travelled (VKT) daily. Traffic generated by the cumulative impacts was estimated at 186,728 VKT daily. The VKT was obtained from Trenotech Transportation Engineers. This is a significant impact.</p> <p>Woodburning</p> <p>4.8-5 At Buildout of the proposed project, in 2005, the contribution of PM10 from woodburning would be approximately 19.4 Mg7 annually, and, for a worst-case day, approximately 369 kg. These calculations assume that all 2,400 proposed units will have EPA-certified woodburning stoves. The proposed project would increase annual PM10 emissions by 15 percent above the current annual</p>	<p>S</p> <p>S</p>	<p>and dust while street sweeping targets the removal of cinders and dust. The Plan aims to limit vehicular traffic in the Town of Mammoth Lakes to 106,600 VMT, which is 40,320 VMT more than the present peak traffic estimates. The proposed project without any transportation plans would increase the VMT by approximately 64,000. To attain the goals of this mitigation measure the Plan will call on future development projects, such as the proposed project, to implement transportation plans. Potential reduction from the above measures are illustrated in Table 4.8-6 for the years 1993, 1995, 2000 and 2005. Alone these mitigation measures would not be sufficient to bring the Town of Mammoth Lakes into compliance with PM10 standards, however, acting in conjunction with mitigation measures proposed for reducing PM10 emissions from wood burning, PM10 standards may be obtained. Adopt and enforce Control Measures 1 through 7 of the Town of Mammoth Lakes Draft Air Quality Management Plan (see Table 4.8-3).</p> <p>4.8-5(a) Mitigation measures related to reducing emissions of PM10 have been outlined in Table 4.8-3. The five mitigation measures targeted toward reducing wood burning-related PM10 emissions are: 1) institution of a public awareness program regarding wood burning, 2) replacement of wood stoves with improved models, 3) phasing out of fireplace, 4) implementation of measures to improve wood</p>	<p>LS</p> <p>LS</p>

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>emissions from residential wood combustion. In the year 2005 the proposed project would contribute approximately twelve percent of the daily emissions of PM10 from fireplaces and wood stoves/inserts. Because the proposed project is in a non-attainment area for PM10, any increase in emissions of this pollutant would be a significant impact on air quality. Therefore, the proposed project would have a significant impact on air quality with respect to PM10 emissions from woodburning related to the project. This is a significant impact.</p>		<p>burning performance, and 5) banning of woodburning in hotel rooms and restriction of fireplace to one per lobby in hotels, 6) control of wood burning during air pollution episodes. A more in-depth discussion of each of these mitigation measures may be found in the Plan in Section 6, Proposed Control Measures and Control Strategy Evaluation, and is hereby incorporated into this document by reference.</p> <p>Mitigation measures to reduce PM10 emissions from wood burning would not be sufficient to bring the Town of Mammoth Lakes into compliance with PM10 standards. These mitigation measures in conjunction with those presented above for traffic related PM10 emissions could achieve compliance with the PM10 standard by the year 1993 and maintain compliance through the year 2005.</p> <p>Based on the projected growth analysis conducted in the Plan, implementation of all control measures with the exception of measure 7.b, would bring PM10 emissions into compliance. Table 4.8-6 shows the cumulative impact of PM10 emissions from development through the year 2005 and the anticipated reductions resulting from implementation of the control measures in Table 4.8-3. The proposed project was included in the emissions inventory of the Plan and therefore is represented as part of the cumulative development anticipated in the Town of Mammoth Lakes. Residential units shall be limited to one woodburning appliance per</p>	

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		dwelling. The appliance must be an EPA Phase II-certified woodburning stove or pellet stove. Woodburning shall comply with standards in the Town's woodburning ordinance (Chapter 8.30, Particulate Emissions Regulations).	
		4.8-5(b) 4.8-5(c)	
4.9 Noise			
4.9.1 Construction-related noise from the proposed project would increase ambient noise levels in areas surrounding the project site. This is a significant impact.	S	<p>4.9.1(a) <i>Construction activities should shall be limited to the hours between 7 a.m. and 7 p.m. 8 p.m. Monday through Friday Saturday and 9 a.m. to 5 p.m. on Sunday in order to minimize disruption noise impacts.</i></p> <p>4.9.1(b) <i>Construction equipment should shall be required by contract to have appropriate mufflers, silencers, and noise control features to be muffled or controlled. Contracts should shall specify that impact tools and engine-driven equipment have intake and exhaust mufflers. Acoustically attenuating shields or shrouds for pavement breakers and jackhammers should be called for by contract. Vehicles and other gas or diesel powered equipment should be prohibited from unnecessary warming up, idling and engine revving, be fitted with appropriate noise mufflers. Copies of contracts shall be filed with the Public Works Director prior to issuance of permits.</i></p>	LS

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

**TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>4.9.2 Noise levels exceeding 60 dBA currently exist on all major arterials and most streets reviewed and are projected to increase significantly as a result of cumulative development with and without the proposed project. Noise levels for the year 2005 with the project would not be noticeably higher than noise levels projected without the project. The electrical gondola will not have a noise impact. Both indoor and outdoor noise levels could exceed thresholds established by the Town. This is a <i>significant</i> impact.</p>	S	4.9.2(a) <i>Sensitive receptors within the proposed project should shall be located or architecturally designed so the exterior noise levels will not exceed 60 dB and interior noise levels would not exceed 45 dB.</i>	LS
		4.9.2(b) <i>Multi-family buildings shall be located or architecturally designed so the interior noise level will not exceed 45 L_{eq}, certified by an acoustical engineer.</i>	
		4.9.2(c) <i>Transit alternatives to reduce traffic, as recommended in the Transportation section of this DEIR EIR, should shall be included in project design to reduce traffic-generated noise levels and their impact on the proposed project and adjacent land uses. Typically, a reduction in traffic of one-half will reduce the noise level by 3 db B.</i>	
4.10 Archaeological			
<p>4.10-1 Development of the proposed project could disturb prehistoric cultural resources. This is a <i>potentially significant</i> impact.</p>	PS	4.10-1(a) <i>North Village Site #1 should shall be subject to subsurface testing and a thorough archaeological survey prior to issuance of a permit for grading or construction. If found to be significant, the site should be avoided or excavated prior to any earth-disturbing activities.</i>	LS
		4.10-1(b) <i>North Village Site #2 should shall be avoided or excavated prior to any earth-disturbing activity. All construction activity at this site and previously unexcavated sites should shall be monitored by a qualified archaeologist. If</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<p><i>subsurface prehistoric archaeological evidence is found, excavation or other construction activity in the area should shall cease and an archaeological consultant should shall be retained to evaluate findings in accordance with standard practice and applicable regulations. Data/artifact recovery, if deemed appropriate, should shall be conducted during the period when construction activities are on hold.</i></p>	
	4.10-1(c)	<p><i>North Village #1 may meet the CEQA criteria for important sites, for its ability to address scientifically consequential research questions. The site would will be impacted by construction. Although avoidance might be considered the preferred treatment for a buried site, the adoption of any mitigation measures would be premature before the site's significance is determined. Further archaeological work is recommended to determine if indeed the site is significant. In accordance with CEQA, any construction within the site area shall be preceded by data recovery. This would will include excavation of up to five 25 by 25 cm shovel test units, surface collection of all surface artifacts, lithic and obsidian hydration analyses and possibly soil chemistry and obsidian source analysis. If no substantial subsurface deposit is encountered, this work would also suffice for data recovery. No permits for grading or other earth-disturbing activities will be issued until all appropriate mitigations are completed.</i></p>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.10-1(d) <i>North Village #2 appears significant. The site is in danger of slow degradation even in the absence of any construction. Its location and high visibility make it susceptible to casual collection and indirect impacts. In accordance with CEQA, any construction within the site area should be preceded by data recovery. Minimally this would include a sample surface collection, excavation of at least six 1 by 1 m excavation units, analyses, curation of collected materials, and a report. No permits for grading or other earth-disturbing activities will be issued until all appropriate mitigations are completed.</i>	
4.10-2 Construction activities could disturb previously unknown human burial sites of Native American groups. This is a <i>potentially significant impact</i> .	PS	4.10-2 <i>See Mitigation Measure 4.10-1; in addition, if human remains are discovered, work shall cease and an appropriate representative of Native American Indian groups and the County Coroner would shall both be informed and consulted, as required by State law.</i>	LS
4.11 Aesthetics/Visual Impacts			
4.11-1 Project development would change the physical and visual character of the project site. This is a <i>significant impact</i> .	S	4.11-1(a) <i>To the maximum extent feasible the proposed project should shall retain forested areas, and should shall remain subordinate to the natural character of the site and the surrounding landscape.</i>	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.11-1(b) <i>Prior to final approval of project development plans, the applicant should shall submit a tree protection preservation and replacement plan prepared by a professional forester, arborist, or landscape architect. Trees shall be replaced on a one-to-one basis with as many trees retained onsite as possible. Where trees have to be relocated off-site, the locations shall be determined through consultation with the Planning Director. The plan, including the type, size, number, and location of replacement trees shall be subject to the approval of the Town of Mammoth Lakes Planning Commission Department.</i>	
		4.11-1(c) <i>Contour grading should shall be used to blend manufactured slopes into the natural terrain. Grading should shall be minimized to preserve existing landform and vegetation to the greatest extent possible.</i>	
		4.11-1(d) <i>In order to reduce visual impacts, a forested buffer should averaging no less than 100 feet shall be retained to the maximum extent feasible along Lake Mary Road, the southern extension of Minaret Road, and along the western and eastern edges of the project site. Special buffering and height restrictions should shall be given to the hotel that is proposed for development across Forest Trail from the Town's community center.</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

**TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.11-1(e) <i>The landscape design for the site should shall maximize the use of existing vegetation, and where new plants are introduced, they should shall include, and/or blend with, plants native to the Mammoth Lakes environment. Landscape Plans for the site should shall be completed by a certified landscape architect.</i>	
		4.11-1(f) <i>To the maximum extent feasible, native trees and landscaping should shall be concentrated around all structures located on the project site.</i>	
		4.11-1(g) <i>Grading shall utilize decorative retaining walls rather than slopes to minimize the area of disturbance.</i>	
4.11-2 Existing views from off-site residential areas, and on-site hotels would be will be permanently altered with development of the proposed gondola. <i>This is a significant impact.</i>	S	4.11-2(a) <i>The height of the proposed gondola should shall be maintained at or near a maximum of 90 feet (just below the tree line), in order to protect views from adjacent residential buildings.</i>	S
		4.11-2(b) <i>To the maximum extent feasible existing trees located along the gondola easement should shall be retained. Replacement trees, in addition to those existing, should shall be planted adjacent to the gondola easement (with property owner approval) in order to create a buffer that will protect privacy and minimize visual impacts on affected properties.</i>	
		4.11-2(c) <i>Natural earth tone colors and non-glare, non-reflective materials should shall be used for the gondola towers and cabins.</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.11-3 Existing views to the project site from Minaret Road and Main Street/Lake Mary Road would be permanently altered.	PS	4.11-3(a) <i>Adoption of the North Village Specific Plan should shall include all provisions for design review stated in the Plan, with all phases and developments proposed within the Specific Plan area undergoing review by a Town appointed Design Review Committee and/or Planning Commission.</i>	LS
		4.11-3(b) <i>The design and height limits of hotels along the ridgeline in the western portion of the site, and along Lake Mary Road, should shall be carefully reviewed for visual impacts. The height, massing and visibility of these hotels should shall respond to, and be compatible with, the natural environment and "Town" character of Mammoth Lakes.</i>	
		4.11-3(c) <i>The architectural style for the development should shall blend with the site's natural setting. Rooflines should reflect the slope of the site, and natural "earth tone" colors and materials such as stone and wood should shall be emphasized. Project development plans (Use Permits and Building Permits) should shall be subject to review by the Town of Mammoth Lakes Planning Commission.</i>	
		4.11-3(d) <i>In order to reduce the visual impact of the proposed Minaret Road pedestrian overpass, the structure's height and visual mass should shall be kept to a minimum and the structure should not include a roof or overhead. The design and materials used for the overpass should shall be</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>compatible with the materials and architectural character of North Village.</i>	
4.12 Light-Glare			
4.12-1 Exterior lighting, specifically street lighting, if not controlled, could have significant impacts on adjacent residences and hotels.	PS	<p>4.12-1(a) <i>All exterior lighting shall be designed and located so as to avoid intrusive effects on adjacent residential properties and undeveloped areas adjacent to the project site. Low-intensity street lighting and low-intensity exterior lighting should shall be used throughout the development to the degree feasible.</i></p> <p>4.12-1(b) <i>Lighting used for various components of the development plan should shall be consistent with North Village Specific Plan implementation standards for light intensity levels, fixture height, fixture location, and design.</i></p> <p>4.12-1(c) <i>Vegetative buffers shall be used to reduce light intrusion on residential development and on forested areas located adjacent to the project site.</i></p>	LS
4.12-2 Sources of reflective glare could emanate from window glass (including the gondola cabins), and from other construction materials. The use of reflective glass and other materials could have significant impacts on adjacent land uses, pedestrians, and motorists traveling along Minaret and Lake Mary Road.	PS	4.12-2 <i>The project should shall use minimally reflective glass and all other materials used on exterior buildings and structures (including the gondola cabins and towers), should be selected with attention to minimizing reflective glare.</i>	LS

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.13 Public Services/Fiscal Impacts			
SNOW			
4.13-1 Snow removal requirements will increase as a result of street improvements and the development of the pedestrian plaza. The closing of Canyon Boulevard, will result in accessibility problems for the removal of snow from the plaza. This is a <i>significant impact</i> .	S	4.13-1(a) <i>All project road alignments and project phases shall be designed to provide the necessary snow storage areas as determined by the Town Department of Public Works. Snow storage areas shall equal at least 10 percent of the surfaces to be cleared.</i>	LS
		4.13-1(b) <i>All buildings, walkways and pedestrian open spaces shall be located a minimum of 20 feet from the roadway edge to limit the amount of snow storage/blowing interference.</i>	
		4.13-1(c) <i>Alternate methods of snow removal, such as radiant heat decking, shall be implemented in the plaza area. Access to the plaza shall be provided at all times to provide for snow removal services.</i>	
		4.13-1(d) <i>Parking garage entry points shall be designed so as not to be facing prevailing winds, otherwise avoid north-facing orientation. Design solutions shall be implemented to prevent blowing and drifting snow from accumulating in the garage entry area.</i>	
		4.13-1(e) <i>Sloping roofs shall be designed so as not to shed snow onto adjacent properties, parking lots, walkways or other passage ways.</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.13-1(f) <i>The Town and CALTRANS shall retain the right to cover with snow any sidewalks located adjacent to streets during snow removal activities.</i>	
		4.13-1(g) <i>No snow removal activities, except that which is performed by the Town or by CALTRANS, shall be allowed to deposit snow within the public rights-of-way.</i>	
		4.13-1(h) <i>To avoid ice build-up, all structures shall be oriented to prevent shading of streets and pedestrian areas to the fullest extent feasible.</i>	
		4.13-1(i) <i>Clearing of private roads shall be handled by the North Village maintenance district.</i>	
		4.13-1(j) <i>Snow associated with the plaza will be hauled off-site and deposited at a suitable location.</i>	
SCHOOLS			
4.13-2 The project is anticipated to produce approximately 373 students (see section 4.5 Jobs/Housing Relationship), resulting in an overcrowded situation for School District facilities. The cumulative impact of the proposed projects within the Town, including North Village, will result in the need for a new elementary school. Each new student is expected to cost the district \$11,000 in capital facilities plus an additional \$4,760 in operating cost. This is an unavoidable, significant impact.	SU	4.13-2(a) <i>The incorporation of this mitigation measure would not reduce project impacts to a less than significant impact unless funding levels provided by State law are dramatically increased. School impacts are therefore considered to be an unavoidable adverse impact. The project proponent shall pay school impact fees under the provisions of AB 2926 or provide equivalent alternative mitigation as determined by the School District. Currently, these fees are set at \$1.58 per square foot of</i>	SU

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>residential space and \$0.26 per square foot of commercial space.</i>	
		4.13-2(b) <i>The project proponent may volunteer to designate a portion of the project site to the District for the purpose of construction a new elementary school facility or to participate in a proportionate share of a school site at another location.</i>	
POLICE			
4.13-3	PS	4.13-3(a) <i>All conceptual and final development plans should shall be reviewed by the Mammoth Lakes Police Department for crime-prone design features prior to plan approval. Police Department recommendations should shall be included in final plans.</i>	LS
		4.13-3(b) <i>If not provided by the developer, phasing plans shall also include the provision of police protection by the Town.</i>	
		4.13-3(c) <i>The project proponent shall contribute sufficient funds to the Town of Mammoth Lakes for the cost of purchasing one patrol car.</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
FIRE PROTECTION			
4.13-4 The closing of Canyon Blvd. will result in an access problem both to the rear of the proposed buildings and to surrounding residential areas; thus, access for delivery service will not meet District requirements. Intensive new development within the Town will also result in a need for a new aerial ladder truck. There is also concern over pumping capacity within the project area. This is a <i>potentially significant impact</i> .	PS	4.13-4(a) <i>A fire lane should shall be dedicated to all of the commercial properties of North Village. Access to all structures should shall comply with Mammoth Lakes Fire Protection District Ordinance #85-02. Access roads should shall be of an approved hard all-weather surface and shall have a minimum clear unobstructed width of 20 feet. All access roads should shall have a minimum vertical clearance of 15 feet. Access roads should shall have a grade of not more than ten percent. To provide for aerial ladder access to building roof tops, a minimum 20 foot wide access road should shall be provided for each structure located not more than 25 feet from the structure, but no closer than one foot for every three feet of building height. This access road should shall have a grade of not more than three percent and shall be clearly posted "No Parking -Fire Lane." All high-rise structures (defined by the District as any structure exceeding three stories or 35 feet in height for nonresidential structures and 55 feet for residential structures) should shall be required to have approved Fire Department access roads to at least two sides of the structure. One of these access roads should shall be on the side of the building with the longest continual roof line. Fire Department access roads that are 150 feet or more in length should shall be provided with approved fire apparatus turn-arounds. The required width</i>	LS

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<p><i>and height clearances for Fire Department access roads should shall be maintained. A lane shall also be designed within North Village to allow access to surrounding neighborhoods.</i></p>	
		<p>4.13-4(b) <i>The project proponent should shall pay a one-time mitigation fee for construction of the project, based upon building height, and another one-time mitigation fee on project operations. Both fees are to be determined by the Fire Protection District and collected by the Town.</i></p>	
		<p>4.13-4(c) <i>If a smoke tower or stairway is used as a required exit for a structure, that exit should shall have an unobstructed passage of not less than six feet in width to the Fire Department access; and, from that point, not less than three feet in width to the public way.</i></p>	
		<p>4.13-4(d) <i>An approved water supply system capable of supplying required fire flow for fire protection purposes should shall be provided to all premises upon which buildings or portions of buildings are constructed. The establishment of gallons-per-minute requirements for fire flow should shall be based on the "Guide for Determination of Required Fire Flow" published by the Insurance Service Office.</i></p>	
		<p>4.13-4(e) <i>Fire hydrants should shall be located and installed per Fire Department standards and approved by the Fire Chief. On-site fire</i></p>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>hydrants should shall be provided when any portion of the building protected is in excess of 150 feet from a water supply on a public street, or as required by the Fire Chief.</i>	
		4.13-4(f) <i>Fire hydrants and access roads should shall be installed and made serviceable prior to and during time of construction. All hydrants should shall be properly identified per Fire Department standards.</i>	
		4.13-4(g) <i>An approved automatic fire extinguishing system should shall be installed in all covered parking areas and other structures having: a foundation footprint of 5,000 square feet or more; a height of more than 35 feet (50 feet for residential condominiums or apartment buildings); or a height of more than three stories. Fire extinguishing systems should shall also be installed for all other occupancies designated for this system in the Uniform Fire and Uniform Building Code, or structures identified as special hazard occupancies as outlined in the appropriate National Fire Protection Association pamphlet.</i>	
		4.13-4(h) <i>Fire standpipe systems should shall be installed in conformance with National Fire Protection Association Standards and the Uniform Fire Code.</i>	
		4.13-4(i) <i>Incorporation of other fire protection methods as necessary in underground parking garages</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

**TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation	
		<i>and high-rise structures based upon building construction, size, and adjoining occupancy types, should shall be determined by the Fire Chief upon formal plan submission.</i>		
		4.13-4(j) <i>All vehicular bridges and pedestrian bridges should shall comply with fire apparatus access road requirements in regards to minimum width and height clearances.</i>		
		4.13-4(k) <i>Liquid petroleum gas storage and system installation should shall comply with Mammoth Lakes Fire Protection District Ordinance #85-02, which establishes and regulates the storage of liquid petroleum gases.</i>		
		4.13-4(l) <i>The developer should shall contribute a fair share proportional amount as determined by the MLFPD for the purchase of a new aerial ladder.</i>		
RECREATION AND PARKS				
4.13-5	The proposed project would create a demand for approximately 14 acres of parkland. This is a <i>potentially significant impact.</i>	PS	4.13-5	
			<i>To help offset this increase in demand for parkland in the Town of Mammoth Lakes, the project proponent shall be required to help fund the dedication of and off-site park or recreation facility.</i>	LS
FISCAL IMPACTS				
4.13-5	4.13-6 The Specific Plan proposed project would have a positive fiscal impact on the Town's budget at project buildout result in a net	B	4.13-6	
			<i>None required.</i>	LS N/A

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
revenue for the Town of Mammoth Lakes. This positive net balance is a <i>beneficial impact</i> .			
4.13-7 The proposed project would add 373 more students to the Mammoth Unified School District and would result in a net cost for the District. This is an <i>unavoidable, significant impact</i> .	SU	4.13-7 <i>Implement Mitigation Measure 4.13-2(a) and 4.13-2(b).</i>	SU
4.13-8 Proposed project is anticipated to generate a net revenue to the Mammoth County Water District. This is a <i>beneficial impact</i> .	B	4.13-8 None required.	N/A
4.13-9 The proposed project would result in a net cost for the Mammoth Lakes Fire Protection District. This is a <i>less-than-significant impact</i> .	LS	4.13-9 <i>Implement Mitigation Measure 4.13-4(b).</i>	LS
4.13-10 The proposed project would contribute towards the Southern Mono Hospital District's annual revenues through payment of property taxes. This is a <i>beneficial impact</i> .	B	4.13-10 None required.	N/A
4.13-11 The proposed project would result in an undetermined net cost to Mono County. This is a <i>significant impact</i> .	S	4.13-11 <i>None feasible.</i>	SU

S = Significant SU = Significant Unavoidable B = Beneficial
LS = Less Than Significant PS = Potentially Significant NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.14 Energy Conservation			
4.14-1 The construction of the proposed project would involve the consumption of electricity and fossil fuels. It is estimated that approximately 2,000 BTU of gasoline, diesel fuel, and electricity are expended for every dollar of construction cost for fabrication and transportation of building materials, worker transportation, site development, and building construction. The construction process will also involve the consumption of water, mainly for dust abatement purposes. This is not considered a significant impact.	LS	4.14-1 <i>None required.</i>	LS
4.14-2 The project is anticipated to consume approximately 20,415,200 kilowatt hours (Kwh) of electricity annually. This aggregate consumption amount is made up of approximately 6,432,400 Kwh for residential uses, 2,253,800 kWh for retail uses, 8,891,000 kWh for the hotel rooms (based upon full occupancy), and 2,838,000 kWh for restaurant uses. This is not considered a significant impact.	LS	4.14-2(a) <i>Energy efficient lighting (e.g., high-pressure sodium outdoor and fluorescent indoor lighting) should shall be used rather than less efficient types. Where possible, miniature fluorescent lamps should shall be used rather than incandescent lamps in fixtures. External lighting should shall be controlled by photocells and/or time switches. Internal lighting systems should shall employ separate switching schemes to ensure maximum use of daylight. Public area lighting, both interior and exterior, should shall be time controlled for safety and protection.</i>	LS
		4.14-2b <i>Thermal insulation that meets or exceeds standards established by the State of California and the Department of Building and Safety</i>	

S = Significant
 LS = Less Than Significant

SU = Significant Unavoidable
 PS = Potentially Significant

B = Beneficial
 NA = Not Applicable

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		<i>should shall be installed in all walls and ceilings.</i>	
	4.14-2c	<i>Feasible opportunities for passive or natural heating and cooling should shall be incorporated in the building designs, which could include: tinted or solar reflective double glazing and heat reflective draperies on appropriate exposures; windowless walls for certain exposures or appropriate passive solar inset of windows; thermal insulation in walls which meets or exceeds State and local standards; and placement of the focus of pedestrian activity within sheltered outdoor areas.</i>	
	4.14-2d	<i>The incorporation of high-efficiency air conditioning controlled by computerized energy management systems should shall be installed to provide the following: variable air volume systems which result in minimum energy consumption and which avoid hot water energy consumption; 100 percent outdoor air economizer cycles to obtain free cooling during cool and dry climatic periods; sequential operation of air conditioning equipment in accordance with building demands; the isolation of air conditioning to any selected floor or floors; and time-controlled interior and exterior public area lighting as necessary for security purposes.</i>	

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

6

TABLE A
REVISIONS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		4.14-2e	<i>The project sponsor should shall consult with the Southern California Edison Company for assistance with energy conservation design features and other passive energy design features.</i>
		4.14-2f	<i>The feasibility of geothermal energy as an alternative energy source should shall be explored.</i>

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
NA = Not Applicable

B. Comments and Responses

INTRODUCTION

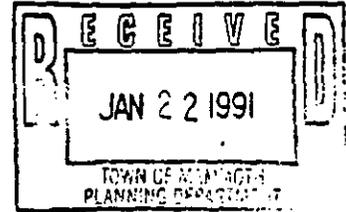
This document contains the public comments received during the public review period from December 17, 1990 to January 31, 1991 on the Draft Environmental Impact Report (DEIR) for the proposed North Village Specific Plan development and written responses to those comments.

Comments and responses are grouped by letter for all written comments. As the subject matter of one letter overlap that of other letter, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided.

These comments and responses, together with the Draft DIR, will constitute the Final EIR for the proposed Project. The Town Council will make the decision on certification of the Final EIR.

TABLE OF CONTENTS

<i>Respondent</i>	<i>Page No.</i>
1. Barbara Campbell (BC)	1-3
2. Caltrans (CAL)	4-6
3. California Highway Patrol (CHP)	7-9
4. Department of Agriculture (DOA)	10-12
5. Department of Transportation (DOT)	13-15
6. Department of Public Works (DPW)	16-29
7. Department of Water Resources (DWR)	30-37
8. Great Basin Unified Air Pollution Control Dist. (GBUAPCD)	38-41
9. Mammoth County Water District (MCWD)	42-47
10. Mary Lou Birkhimer (MLB)	48-61
11. Mammoth Unified School District (MUSD)	62-63
12. North Village Association (NVA)	64-72
13. Office of Planning and Research (OPR)	73-75
14. Owens River Ranch (ORR)	76-77
15. Rudder, Liebersbach & Mohun (RLM)	78-118
16. Ronald Wann	119-124
17. Robert W. Sassaman (RWS)	125-126
18. Summary of Comments (SOC)	127-147
19. Tom Grant (TG)	148-160



Subject: North Village Comments

Planning Department
Town of Mammoth Lakes

BC

To whom it may concern:

I wish to make a few comments on the proposed North Village project. I do believe that the North Village project will be a great asset to the community and hope that it will be able to move forward once all of the concerns have been addressed. My concerns are two fold:

1. The steepness of Forest Trail at the intersection of Forest Trail and Hillside Drive poses a serious safety threat to residents if they are forced to attempt to stop at that intersection. They are also faced with the problem of a lefthand turn for residents coming toward Minaret on Forest Trail at Hillside Drive.
2. My second concern relates to development at a time when when lack of snow and water resources weigh heavily on our economy and minds.

Concern #1

I would request that there be a traffic engineering study of the intersection of Forest Trail and Hillside Drive and the proposed realignment of that intersection. It would appear that it would be perhaps impossible to correct the grade to the extent necessary to enable residents to stop at that intersection under winter driving conditions. Forest Trail, like Canyon Blvd., is extremely dangerous where it enters Minaret and yet the grade at that intersection is not as steep as the one at Forest Trail and Hillside Drive where a stop sign is proposed for the exiting residents. The residents will also have difficulty getting traction under winter driving conditions at that same intersection if uphill traffic is forced to make a "jog" before continuing on up Forest Trail. If this could be studied by a traffic engineer and a solution found then the residents would not have to have their safety jeprodized. The EIR does not address downhill traffic on Forest Trail nor the extent of traffic useage of this stretch of road as a result of the rerouting of traffic to Warming Hut II. If the 1,250 current useage identified in the EIR is increased by 8,600 additional vehicles at peak times, the residents will find it next to impossible to make a lefthand turn on to the realignment going toward Minaret Road.

BC-1

Concern #2

It is difficult to justify continued development during this period of severe drought when established properties are already limited and loosing their investment in landscaping and property value due to restrictions. By the same token, if

each property owner, who is currently receiving water service, were given their allotment and allowed to do their own prioritizing on useage, they could elect to use their water as they see fit and be penalized for over useage should they exceed their allotment. If infact, after reviewing all of the allotments necessary to sustain the town, there was insufficient water for further development, then it would be appropriate for a water moritorium. I would want to see exemptions for those projects where financing and escrows are in progress due to the major problems faced in securing that financing and a financial commitment for a major project or a proposed home. There must be balance and reason in the thinking and determination of the appropriateness of major development at this time rather than just a blanket moritorium on all construction or a blanket go-ahead to build at our current rate. In the drought of 1976-1977, there was a moritorium and at one point a lottery. Also construction was permitted with water hook-up not available at that time. This drought situation must be given careful study and deliberation prior to any major development proceeding. There are many very reasonable approaches all of which need to be placed on the table.

Thank you for receiving and considering my comments. I will follow with great interest the progress on the review of the EIR.

Barbara Campbell
1582 Forest Trail
Mammoth Lakes



18 year resident and veteran of drought and growth!

BC-1 Specific design issues for the Canyon Boulevard re-alignment, including grades, have been examined in previous studies presented to the Town of Mammoth Lakes. All of the final design elements are subject to be reviewed and approved by the Town. Mitigations also include improvements to Lakeview and Lake Mary Road which will absorb much of the skier traffic.

BC-2 See Response to Comment DOA-5.

January 25, 1991

Mno-203-4.0
SCH #89040321

Town of Mammoth Lakes
Planning Department
P. O. Box 1609
Mammoth Lakes, CA 93546

Attn: Mr. Bill Taylor

North Village
Draft Specific Plan and Environmental Impact Report
SCH #89040321

We have reviewed the above referenced document and have the following comments:

A Cooperative Agreement between Caltrans and the Local Agency, which details the parties' respective roles and responsibilities for any improvements to the state highway, must be executed prior to right-of-way acquisition, design and construction. Any project work relating to the state highway must be constructed according to Caltrans policies and specifications. Mr. Chuck Carter (872-0681), Local Streets and Roads Engineer for Caltrans, should be consulted for preparation of the Cooperative Agreement. Enclosed, for your information, is a copy of "Procedures Guide for Special Funded State Highway Projects".

CAL-1
CAL-2

When design of the drainage facilities is initiated, the developer shall contact Mr. Richard Kizer of our office (872-0634) for consultation and coordination.

CAL-3

The traffic analysis appears to be complete and we concur, in principle, with the proposed mitigation. However, the analysis of impacts to the Route 203 (Minaret Road) capacity does not extend beyond Forest Trail. Between Forest Trail and the Mammoth Mountain Ski Area main lodge, Route 203 is a 2-lane mountain road. The traffic analysis should be expanded to evaluate the "cumulative plus project" impacts on this stretch of road.

CAL-4
CAL-5

The application of Transportation Demand Management techniques could have a significant impact on lessening vehicular traffic in heavily congested areas and we encourage their use.

CAL-6

Town of Mammoth Lakes
Page 2
January 25, 1991

Access management is an effective method of reducing side friction. All proposed new access points and modifications to existing access points on the state highway shall be evaluated and approved by Caltrans before an Encroachment Permit can be issued. If you have any questions regarding this requirement please call Mr. Ralph Cones at 619-872-0674.

CAL-7

Thank you for the opportunity to review this project and if you have any questions regarding these comments, please call me at 619-872-0693.

Very truly yours,



Andrew J. Zeilman, Chief
Transportation Planning Branch

AJZ
cc: SCH ✓
Enclosure

- CAL-1 Conditions of Approval specified by Caltrans are duly noted.
- CAL-2 See Response to Comment CAL-1.
- CAL-3 Comment noted.
- CAL-4 Comment noted. No response is required.
- CAL-5 Comment noted. The traffic impact analysis was expanded to examine Route 203 beyond Forest Trail. Please see Response to Comment DOT-3. However, the capacity at Main Lodge is not expanding. The gondola and emphasis on transit to reduce vehicle trips should avoid significant impacts to 203.
- CAL-6 Comment noted. TDM is a vital part of trip reduction related to transit system design (p. 4.7-31).
- CAL-7 See Response to Comment CAL-1.

Memorandum

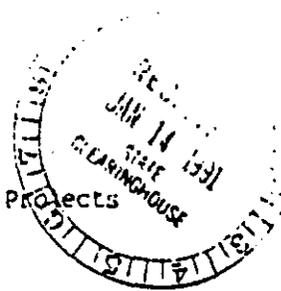
Date: January 7, 1991

To: CHP, Headquarters - Office of Special Projects
State Clearinghouse

From: DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
Bridgeport Area

File No.: 820-7687-7687

Subject: ENVIRONMENTAL DOCUMENT REVIEW SCH# 89-040321



The proposed North Village Project in the Town of Mammoth Lakes, CA. within Mono County will have a significant impact upon the operations of the Bridgeport Area. The traffic enforcement jurisdiction for all roads leading into the project location is patrolled by the California Highway Patrol. The Mammoth Lakes Resident Post is currently staffed by 5 traffic Officers who are currently able to maintain adequate traffic control for existing needs for services.

With the development of this project we can expect a significant increase in calls for services based upon the environmental impact report. Some of the items listed within the report that indicate an increase in calls for services would appear likely are listed below.

1. The report estimates the need for one additional elementary school with an increase on 373 students into the public school system.
2. The local Mammoth Lakes Police Dept. is expecting a 15 to 30 percent increase in calls for services.
3. The plan calls for an increase of approximately 2,000 new hotel/motel lodging units.
4. An increase of 400 condominium units.
5. An increase of 24,000 square feet of commercial, retail and restaurant space.
6. A potential increase of 1,612 new permanent jobs.
7. A new ski lift operation designed to increase the design capacity of Mammoth Lakes Ski facility by 2,500 skiers per hour.
8. An expected increase in the present permanent Town population of 5,200 by 2,820 or an increase of over 50% in a very short time period.
9. The increase in population is expected to require an increase in housing demand by an estimated 1,210 housing units.

CHP-1

CHP-2

CHP-3

CHP-4

CHP-5

CHP-6

CHP-7

CHP-8

CHP-9

CHP-10

ENVIRONMENTAL DOCUMENT REVIEW
January 7, 1991
Page 2

The environmental impact report deals only with the demands that will be placed upon the Town of Mammoth Lakes. I have pointed out the fallacy of this planning during the initial review of this project. I suggested that the impact on surrounding arterial roadways and emergency service providers be evaluated during a previous review. Apparently the project planners feel that traffic will only materialize at the Town of Mammoth Lakes city limit signs. If this project continues without mitigation being required by the developer the Mono County CHP office will find ourselves attempting to catch up and increase personnel levels to match demands for services. Now is the time to require funding and staffing prior to the implementation of a completed project.

CHP-11

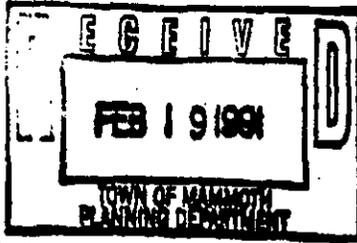
CHP-12

This project will require the addition of a CHP unit on days and on evenings. This staffing need will require the addition of 3 field personnel to the Mammoth Lakes Resident Post. Mitigation should be required from the developer to assist the State in providing for the additional personnel and equipment this project will invariably require.

R. B. Reed, Lt.
R. B. REED, LT.
Commander
Bridgeport Area

cc: INLAND DIVISION

- CHP-1 The Project proponent shall contribute an amount to the California Highway Patrol for the purchase of equipment needed as a result of the Project. This amount shall be determined through negotiations between the California Highway Patrol and the Project proponent. This response is to be included in the Final EIR as Mitigation Measure 4.13-3(d).
- CHP-2 Comment noted. No response is required.
- CHP-3 Comment noted. No response is required.
- CHP-4 Comment noted. No response is required.
- CHP-5 Comment noted. No response is required.
- CHP-6 Comment noted. No response is required.
- CHP-7 Comment noted. See Response to Comment CHP-1.
- CHP-8 Comment noted. See Response to Comment CHP-1.
- CHP-9 Comment noted. See Response to Comment CHP-1.
- CHP-10 Comment noted. See Response to Comment CHP-1.
- CHP-11 See Response to Comment RLM-6.
- CHP-12 Comment noted.



Reply to: 1560

DOA

Date: February 14, 1991

DOA

Mr. Randall Mallinger
Planning Director, Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, California 93546

Dear Randy:

The following are comments that I have concerning the proposed North Village Specific Plan (December 1990). Thank you for the opportunity to comment beyond the February 3, 1991 deadline.

Page 2-8: Ski Lift and Ski Back-

The document needs to mention that portions of both of these aspects of the project are located on National Forest System lands. The proponent will need to acquire approval through environmental evaluation and the special use permit process before any construction can occur.

DOA-1

Page 2-10: Open Space-

The concept of another Town park located on Forest lands seems somewhat disturbing at this time, but without site specific plans, I need to reserve comment. If the project is required to provide a certain amount of open or community space, then this should be accomplished within the confines of the private property boundary.

DOA-2

Figure 4.1-4: Legend for Regional Geologic Map-

Under the item that is marked with an *, there is reference to a Table 2 that refers to the eruptions that have previously occurred. Table 2 is missing from the document.

DOA-3

Page 4.1-18: Geologic Safety, item number 29a-

There has not been any discussion about designating additional access road alignment(s) to accommodate buildout populations.

DOA-4

Page 4.6-5: Utilities, Water Quantity Impact 4.6-1-

MCWD presently has approximately 3400 acre-feet of water available for community demand. During 1989, 2746 acre-feet were needed to satisfy that demand. The balance, 654 acre-feet, has been identified by four specific plans (Snowcreek,

Caring for the Land and Serving People

FS-0200-28(7-82)



Juniper Ridge, Lodestar, and North Village) as the water required for the construction of each project. Each plan identifies that their specific project will need less than the 654 acre-feet that is available, and states that there is a less-than-significant impact. Each document should point the duplication factor that is being used, so that the reviewers can realize what is meant by the impact mitigation.

DOA-5

Traffic

Page 4.7-42: Pedestrian Circulation and Public Transit-
I need to reserve comment on the proposed marshalling area/bus stop until more detailed plans are available.

DOA-6

ALTS

Page 7-6: Alternative Three, South Gateway Site
This site is in nonconformance with both the Town's General Plan and the Forest's Land Management Plan. There is no reason for the this location to be evaluated as an alternate site, since it is not available for this type of use.

DOA-7

Thank you again for the opportunity to comment. If you have any questions, please feel free to contact me or Thom Haller of my staff.

Sincerely,

DEBORAH L. R. AUSTIN
District Ranger



- DOA-1 Conditions of Approval specified by the Department of Agriculture are duly noted.
- DOA-2 Conditions of Approval specified by the Department of Agriculture are duly noted.
- DOA-3 Comment noted. Please refer to Endnote Number 2 on page 4.1-23.
- DOA-4 Roadway intersection improvements outlined in the Traffic Section (pages 4.7-29-4.7.31) would serve the same purpose.
- DOA-5 As stated in the EIR, Project construction is subject to the availability of water. Construction would be deferred if adequate supplies are not available. Depending on the water availability, water permits for construction are distributed on a first-come-first-served basis. See also Response to Comment DPW-58.
- DOA-6 Comment noted. No response is required.
- DOA-7 Comment noted. However, the decision in Citizens of Goleta Valley vs. Board of Supervisors, 1988 and 1989 ("Goleta I and II") states that different ownership, different jurisdiction, economic impacts to project proponent, different environmental impacts, and different zoning or General Plan land use designation are invalid arguments for determining infeasibility of alternative sites.

DEPARTMENT OF TRANSPORTATION

500 SOUTH MAIN STREET
BISHOP, CA 93514

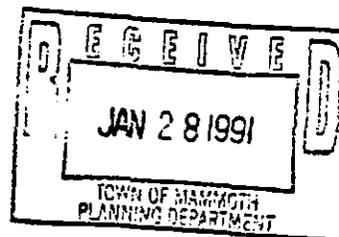


January 25, 1991

Mno-203-4.0
SCH #89040321

Town of Mammoth Lakes
Planning Department
P. O. Box 1609
Mammoth Lakes, CA 93546

Attn: Mr. Bill Taylor



North Village
Draft Specific Plan and Environmental Impact Report
SCH #89040321

We have reviewed the above referenced document and have the following comments:

A Cooperative Agreement between Caltrans and the Local Agency, which details the parties' respective roles and responsibilities for any improvements to the state highway, must be executed prior to right-of-way acquisition, design and construction. Any project work relating to the state highway must be constructed according to Caltrans policies and specifications. Mr. Chuck Carter (872-0681), Local Streets and Roads Engineer for Caltrans, should be consulted for preparation of the Cooperative Agreement. Enclosed, for your information, is a copy of "Procedures Guide for Special Funded State Highway Projects".

DOT-1

When design of the drainage facilities is initiated, the developer shall contact Mr. Richard Kizer of our office (872-0634) for consultation and coordination.

DOT-2

The traffic analysis appears to be complete and we concur, in principle, with the proposed mitigation. However, the analysis of impacts to the Route 203 (Minaret Road) capacity does not extend beyond Forest Trail. Between Forest Trail and the Mammoth Mountain Ski Area main lodge, Route 203 is a 2-lane mountain road. The traffic analysis should be expanded to evaluate the "cumulative plus project" impacts on this stretch of road.

DOT-3

The application of Transportation Demand Management techniques could have a significant impact on lessening vehicular traffic in heavily congested areas and we encourage their use.

DOT-4

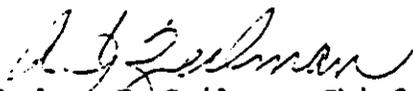
Town of Mammoth Lakes
Page 2
January 25, 1991

Access management is an effective method of reducing side friction. All proposed new access points and modifications to existing access points on the state highway shall be evaluated and approved by Caltrans before an Encroachment Permit can be issued. If you have any questions regarding this requirement please call Mr. Ralph Cones at 619-872-0674.

DOT-5

Thank you for the opportunity to review this project and if you have any questions regarding these comments, please call me at 619-872-0693.

Very truly yours,



Andrew J. Zeilman, Chief
Transportation Planning Branch

AJZ
cc: SCH
Enclosure

- DOT-1 This comment which discusses Caltrans procedures for making improvements within the state right-of-way, is noted.
- DOT-2 Comment noted. This does not apply to the DEIR.
- DOT-3 The traffic impact analysis was expanded to examine Route 203 (Minaret Road) north of Forest Trail. Traffic projections for the cumulative plus project scenario indicate daily traffic levels of approximately 13,100 on this segment. This two-lane arterial (as designated in the General Plan) does not have adjoining sites with access points, which would lower its capacity. Therefore, the capacity of this two-lane segment is 17,500 ADT. This roadway segment would therefore operate at LOS "C" (V/C of 0.75) with the future conditions.
- DOT-4 Comment noted.
- DOT-5 Comment noted. This does not apply to the DEIR.

THE TOWN OF MAMMOTH LAKES
THE DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

* *
February 1, 1991

TO: Randy Mellinger, Bill Taylor, Karen Johnston

FROM: Gary Cullen, Camille White

SUBJECT: Preliminary Draft Environmental Impact
Report North Village Specific Plan

COPIES: Ed Schoerner, BYRON ROULMAN

The Public Works Department has the following comments and conditions for the subject Specific Plan:

1. STREETS AND TRAFFIC

- a. The Traffic Report recommends many roadway improvements and widenings. The report has not discussed the Public Transit options to any extent nor has it indicated if certain improvements can be delayed or eliminated by use of Public Transit. A transit study should be undertaken to determine what the transit needs are and what roadway improvements can be deferred or eliminated by better use of transit. A transit hub should be a major consideration of this study. DPW-1
DPW-2
- b. All required parking in the North Village should be on-site and completely off of the street Right-of-Way. Head in parking right off of the street should not be permitted. On-street parking, on both Lakeview and Davidson, up by Warming Hut 2 should be reevaluated to determine if it should be eliminated to encourage use of the transit system. DPW-3
DPW-4
- c. Required setback for the offstreet parking is 20 feet. Zoning Ordinance Chapter 19.14 (G) Page 97. DPW-5
- d. There shall be a minimum of one (1) handicap parking space per business. Title 24, California Administrative Code. DPW-6
- e. Road Rehabilitation Fee: All developments within the North Village Specific Plan shall pay a road rehabilitation Fee of \$1.00 per square foot for the frontage width of the property times the half width of pavement. DPW-7
- f. There shall be only one driveway per property without Planning and Public Works approval. Driveways shall meet the Driveway Standards adopted by Resolution 89-51. DPW-8
DPW-9
- g. No work in Town right of way shall be started until an Encroachment Permit has been obtained from the Public Works DPW-10

Department. The site plan should show all facilities proposed or existing within the right-of-way including pavement and utilities and should show any other contemplated work within the right of way.

- h. All street improvements shall be constructed per Street Improvement Plans to be approved by the Town. Two complete sets shall be submitted for checking and, when approved DPW-11 three complete sets shall be submitted to be stamped "Approved".
- i. Streets requiring improvements shall be, as a minimum, Minaret Road, Main Street, Lake Mary Road, Canyon Blv'd., Forest Trail, and Berner Street. All streets shall be improved to current Town Standards, with all required dedication of right-of-way and plans shall show all sidewalks and bikeway improvements required or proposed. Contributions towards off-site improvements should be in proportion to the contribution of project traffic to those locations. DPW-12
- j. All intersections relieving work shall be shown on the plans and a complete set of striping plans shall be required as well. Intersections to relieve work shall be as listed in the Traffic Report prepared for this EIR. DPW-13
- k. The following intersections shall require signals: Lake Mary Road/Lakeview Road and Forest Trail/Minaret Road. These should be required to be installed prior to the completion of any developments. The following intersections shall require a contribution for signals: Chateau Road/Minaret Road, Old Mammoth Road/Minaret Road, Chateau Road/Old Mammoth Road and Minaret Road/Meridian Blvd. (already built). This project's contribution should be based on their proportion of project generated traffic at each intersection. The intersection of Main Street and Forest Trail should be evaluated to see if it meets signal warrants as well. This should be done after the traffic spit at Minaret and Forest Trail is reevaluated by the North Village Report. DPW-14
- l. The Traffic Report should look at the potential for increased traffic onto Forest Trail east of Minaret Road. The location of a traffic signal at Forest Trail and Minaret may encourage traffic to route down Forest Trail. Any increase of traffic from here could cause the intersection of Forest Trail and Main Street to meet signal warrants. This should be required to be evaluated by the Traffic Engineer. DPW-15
- m. Bike lanes and bike traffic are not discussed in the Traffic Report, but summer bike traffic should be considered even though it does not occur at the peak traffic period. Provisions for bike lanes need to be made. DPW-16
- n. There has been considerable review and comment on the proposed Gondola. All previous correspondence and comments regarding the Gondola should be considered to be a part of these comments. The Gondola should be required before the completion of the hotel. DPW-17

- o. The Ski-Back may pose a concern at Forest Trail and Minaret. This concern is for the potential "pedestrian/skier" crossing at the intersection. This should be discussed. DPW-19
- p. The cleaning and clearing of snow from sidewalks needs to be addressed. Will sidewalks have to be set back far enough from the street to prevent snow from street clearing from burying the sidewalk? Should all clearing of the streets be required to haul snow to the Town Snow Storage Pit? DPW-20
DPW-21
DPW-22
- q. Figure 4.7-4: The proposed road closures on this figure aren't very clear. These should be depicted in a better way. DPW-23
- r. Minaret Road between Main Street and Meridian Blv'd. has been completed. Should the Traffic Report be updated to reflect this? This would involve updating the discription of Minaret Road and several figures (4.7-1, -5, -6, & -7). DPW-24
DPW-25
- s. Finish the sentence at the end of the paragraph titled "Existing Levels of Service". DPW-26
- t. Suggest we use Tables 4.7.11 & .12 to assess contributions for the improvements to the off-site roadways. The percentage share of costs should be based on the percentage of future traffic added. DPW-27
- u. Larger detail drawings of the proposed improvements would help in assessing their desireability. Also, the Traffic Study recommended additional improvements that may bear closer inspection. DPW-28
DPW-29
- v. Traffic flows along the new route for Canyon Blv'd. need to be reviewed. At the location where Canyon is detoured would it be adviseable to close Hillside and Forest Trail? This may reduce potentially significant conflicts of turning patterns. A redesign of the intersection at the very least is needed. Also, curve radii of 300 feet have been recommended and this may require the reduction of one or more lots on the inside of these curves. DPW-30
DPW-31
- w. Is there a chance of traffic routing onto Kelly Road and then to Majestic Pines to get to Meridian from the North Village/Hut II area? If so, perhaps the closing of Majestic Pines between Silvertip Lane and Pinehurst Drive should be considered. Or the closing of Kelly Road from its intersection with Silver Tip Lane to its 90 degree bend should be condiered. The first does not eliminate a second access to this area, but makes the route more circuitous and should reduce through traffic in a residential neighborhood. The second option will eliminate the second access but if Majestic Pines is completed will not be a problem.(see # 1.2 following) Also, if not closed, curve radii of 300 feet have been recommended for the Majestic Pines/Kelly Road connection to Main Street and this may require use of one or more lots on the inside of these curves. Either closure could give the Town land for a small park that would benefit this area and is called for in the Parks and Recreation Element of the General Plan. DPW-32
DPW-33

- x. Should Berner Street be "cul-de-sac"-ed instead rerouted? DPW-34
- y. There should be some discussion of how the current winter saturday peak hour traffic counts were obtained? Were counters on the streets during the peak period or were these projected on some basis? DPW-35
DPW-36
- z. Is the winter capacity reduction of 15% reasonable, and why? DPW-37
- aa. Both the North Village and Lodestar E.I.R.'s assume that the Sherwin Ski Area will happen. What if it doesnt? Will this put more traffic onto the streets feeding to M.M.S.A.? DPW-38
- bb. There are differences in the projected levels of service in the Lodestar report and the North Village report. Usually this is one level. There were also slightly different traffic generation values for North Village in the two reports. Is the difference in the traffic generated from North Village the cause? What are these differences and are they enough to make such changes? DPW-39
DPW-40
- cc. Figure 4.7-8 vs. 4.7-9: See Meridian east of Minaret. The increases here do not seem consistant with the increases in the other legs of that intersection. DPW-41
- dd. Note that the new Minaret Extension goes straight to a level of service "F". This should obviously go to four lanes. Seems that North Village should pay a percentage contribution equal to it's additional percentage of traffic at that location. This contribution should be included for all roads and improvements that North Village contributes traffic to both on-site and off-site. Note that the requested Transit Study may show that four lanes are unnecessary with adequate transit capacity. DPW-42
- ee. Figure 4.7-4: The road closures are not clear on this map. They could be depicted clearer. DPW-43
- ff. Finish the sentence at the end of the 2nd paragraph of "Existing Levels of Service". DPW-44
- gg. Require Lake Mary be widened to four lanes from Lakeview to Minaret. This may be avoided with the Transit Study recommendations. DPW-45

2. DRAINAGE

- a. A North Village Drainage Plan shall be required and shall show all existing drainage courses as well as all improvements. Improvements shall be required to safely conduct drainage to a natural drainage course or into the Storm drain System. This shall be subject to review and approval by the Public Works Department. DPW-46
- b. This proposed development shall conform to the Lahontan Regional Water Quality Control Board's guidelines for erosion and sediment control and any other requirements of the Public DPW-47

Works Department or the Grading Ordinance.

- c. Murphy Gulch Drainage fees shall be imposed on all development in the North Village Specific Plan.
- d. All improvements on-site shown in the Master Storm Drain Plan shall be required as applicable.

DPW-48

DPW-49

3. UTILITIES

- a. Provide for all utilities including water, sewer, telephone, cable TV and electric. All utilities shall be placed underground. Utility design and installation shall conform to the requirements of the serving Utility Companies. All Utility Easements shall be shown on the Final Map prior to final approval by the Public Works Department. All Utility Companies to provide plans of their utility to the Public Works Department.
- b. All Utilities in dedicated roads or roads intended to be dedicated, whether now or in the future, shall be subject to the Encroachment Ordinance and Encroachment Permits applied for with the Public Works Department.
- c. Sewer and Water shall conform to the requirements of the Mammoth County Water District. The Town shall be furnished with a copy of the approved Sewer and Water Plans.
- d. Drought conditions require that water concerns be given a high priority. Exterior landscaping shall be xeriscape type and irrigation shall be drip or other approved water conservative type. The Mammoth County Water District (MCWD) requirements shall be conformed to at all times. Water intensive landscaping shall be avoided and at least some planting may require postponement if reclaimed water cannot be used for irrigation.
- e. All water required for construction grading, dust control, etc... shall be reclaimed water.
- f. The following is the proposed "new" (ie; additional) development and, based on the demands shown in Table 4.6.2 of the report, the projected demand appears to be too small.

DPW-50

DPW-51

DPW-52

DPW-53

DPW-54

DPW-55

Motel/Hotel (per year)

$$\frac{2,000 \text{ units} \times 34,744 \text{ gal./unit}}{7.48 \text{ gal./c.f.} \times 43,560 \text{ s.f./ac.}} = 213.3 \text{ ac.ft.}$$

Condominiums

$$\frac{400 \text{ units} \times 50,400 \text{ gal./unit}}{7.48 \text{ gal./c.f.} \times 43,560 \text{ s.f./ac.}} = 61.9 \text{ ac.ft.}$$

Commercial Space

No demand figures available, but may include several

restaurants with high demand.

Landscaping

No large area, but some landscaping will undoubtedly be involved. Demand uncertain.

TOTAL.....275.2 ac.ft.

increase this by 25 ac.ft. to account for restaurants, etc,...

NEW TOTAL (estimated).....300 ac.ft.

The demand figures given in Table 4.6.2 and used above are representative of actual Town usage rates. These actual rates are Town-wide and so should account for second homeowner or seasonal rental use. Commercial Space estimates could be refined if the number and seating capacity of projected restaurants were included. Three restaurants and three bars would equal approximately 7 ac.ft. of demand. Landscaping of only 3 1/2 acres scattered throughout the North Village would account for the rest of the 25 ac.ft. Somewhat less landscaping, plus the retail shops, could easily equal the 25 ac.ft. added. It should be known how much landscaping is expected and what is it's projected demand?

- f. After analyzing the information contained in this document, the Snowcreek EIS, North Village DEIR, and a Press Release, dated November 8, 1990 by Jim Kuykendall, MCWD Manager, it appears that the Town used more surface water than was legally available through the MCWD Permits in 1990. (See Exhibit "A"). If additional water from outside sources has to be piped to the project location, this project and any future projects utilizing the new water source should equally be assessed for the costs of procuring the water.
- e. The report does not address the cumulative future needs. (see note #3.f above.) The Snowcreek EIR, Jan. 1989, indicates that during a drought year surface water diversion may be restricted to as low as 1,100 acre feet/year from an upper limit of 2,760 acre feet/year.

4. MONUMENTS

- a. In addition to other monuments required by the code or state law, street centerline monuments shall be in a lamp-hole type encasement (conforming to the Public Works Department requirements):
- b. Monuments shall be set in existing streets where required and along all new alignments and renovated street segments.

DPW-56

DPW-57

DPW-58

DPW-59

DPW-60

5. SOILS REPORT

- a. A Soils Report should be required for this Specific Plan. This can be broken down into two categories: (a) Soils Report for the design of the street structural section and (b) the Preliminary Soils Report required by the Map Act. DPW-61

6. IMPROVEMENT PLANS AND SPECIFICATIONS

- a. The developer shall submit complete Improvement Plans for approval, prior to construction, showing all proposed or required improvements, a Construction Cost Estimate and Specifications for the Project. Said Plans, Estimate and Specifications shall meet with the approval of the Director of Public Works. The Specifications shall include a Retained Strength Method specification for the testing of Asphalt Concrete delivered to this project. Said material shall be certified to the Department by a qualified testing laboratory before production commences. A sample specification for the Retained Strength Method can be obtained from the Public Works Department. DPW-62

7. IMPROVEMENT AGREEMENT

- a. The Developer shall agree to enter into a Subdivision Agreement with the Town according to Section 17.20.170 of the Town Code and shall post the required Improvement Security as required by the same Town Code Section and Sections 66499 through 66499.4 of the Subdivision Map Act. The said securities shall conform to either sub-sections (1), (2) or (3) of said Section 66499, being either a bond, a cash deposit, or an instrument of credit. This shall include a security or securities for (1) faithful performance, (2) labor and material payments, (3) one year maintenance and (4) expenses and fees in case an action is brought against the Subdivider for non compliance. DPW-63

8. ON-SITE DEVELOPMENT

- a. Any work that includes on-site grading, drainage interruption, land clearing, a potential for erosion and/or siltation, etc. (essentially, any work that comes under the Grading Ordinance) shall be the subject of an application for a Grading Permit and a Grading Permit issued before any work is commenced. DPW-64

9. OTHER REQUIREMENTS

- a. All requirements of the Public Works Department shall be complied with prior to the approval of the Final Map and Improvement Plans. Said requirements shall be based on State and Local law, the Planning Commission Conditions of Approval, good Engineering principles and practices, and on the physical conditions of the site as revealed by the final DPW-4

design and improvement plans.

b. The Subdivider shall conform to the requirements of all Federal, State or local agencies regulating the work. This shall include, but is not limited to, the Lahontan Regional Water Quality Control Board, O.S.H.A., the Great Basin Air Pollution Control District, the Mammoth Fire Protection District and the Mammoth County Water District.

DPW-66

c. All lots or properties within the Specific Plan shall conform to the Property Numbering Ordinance.

DPW-67

d. New street names, if any, shall be submitted for approval by the Town.

DPW-68

10. Miscellaneous

a. Figure 2.1.2: The little clock at the bottom of the page is pointing the wrong way if it's supposed to point north.

DPW-69

b. Gondola: We have lots of gondola comments made previously. These should all be considered to be a part of these comments.

DPW-70

c. Page 4.2-10: The depth to groundwater is a blank.

DPW-71

d. If additional police officers are necessary because of the impact of the project, the project should contribute something to at least equip the new officers.

DPW-72

e. The number of employee housing units should be specified.

DPW-73

f. Prior to recording the Final Map, an up-to-date title report to be submitted showing the ownership of the participating parcels, if a part of the subdivision. All of the above parcels are now included as a part of the subdivision and shall remain within the subdivision especially if they add to the required density calculations.
22-300-15, 22-300-17, 22-382-13, 22-382-02, 22-394-02, 22-382-07, 22-382-06, & 22-393-06.

DPW-74

g. Prior to recording Final Map, deeds to be submitted for the deeding of excess land to Lots 4 & 5.

DPW-75

c:\ws5\plan3\nvilcom1.doc

- DPW-1 See Response to Comment RLM-21.
- DPW-2 Conditions of Approval specified by the Town of Mammoth Lakes Public Works Department are duly noted.
- DPW-3 See Response to Comment DPW-2.
- DPW-4 See Response to Comment DPW-2.
- DPW-5 See Response to Comment DPW-2.
- DPW-6 See Response to Comment DPW-2.
- DPW-7 Comment noted.
- DPW-8 See Response to Comment DPW-2.
- DPW-9 See Response to Comment DPW-2.
- DPW-10 Comment noted. This is not a comment on the DEIR.
- DPW-11 See Response to Comment DPW-2.
- DPW-12 See Response to Comment DPW-2.
- DPW-13 See Response to Comment DPW-2.
- DPW-14 See Response to Comment DPW-2.
- DPW-15 See Response to Comment DPW-2 and MLB-17.
- DPW-16 See Response to Comment MLB-17.
- DPW-17 Bike lanes should be incorporated into the NVSP in accordance with the policies set forth in the General Plan. Bicycle traffic will not significantly affect the LOS of the intersection.
- DPW-18 Comment noted. Review of the gondola under this EIR does not constitute final approval of the proposal. Specific Plans for the gondola will be subject to a design review, possibly future, more specific environmental review, and approval by the Town of Mammoth Lakes Planning Commission.
- DPW-19 A pedestrian undercrossing on the north leg of the Forest Trail/Minaret Road Intersection is proposed in the NVSP. This undercrossing would connect the ski-

back trail (which terminates at the northwest corner of this intersection) with the bus stop/marshalling area on the northeast corner. The pedestrian undercrossing will reduce potential conflicts at this intersection between skiers, pedestrians and vehicular traffic. The traffic signal that will be installed at the intersection should also be equipped with provisions for pedestrians.

- DPW-20 The removal of snow from the sidewalks will be the responsibility of the North Village Maintenance District.
- DPW-21 Please see Mitigation Measure 4.13-1(b) or page 4.13-2.
- DPW-22 Please see Mitigation Measure 4.13-1(a) or page 4.13-2 of the Utilities Section. Snow associated with the plaza will be hauled off-site. This work will be performed by a private contractor, who will also arrange for snow storage.
- DPW-23 Comment noted.
- DPW-24 Comment noted. The figures are revised in the EIR.
- DPW-25 See Response to Comment DPW-24.
- DPW-26 Comment noted. The sentence change will be reflected in the EIR.
- DPW-27 Mr. Cullen's and Ms. White's opinions are noted. "Fair share" contribution by the NVSP to all roadways impacted would be appropriate. A reimbursement arrangement may be necessary related to Lakeview/Lake Mary Road improvements.
- DPW-28 Comment noted. No response required.
- DPW-29 Comment noted. No response required.
- DPW-30 Alignment studies done for Canyon Boulevard show Canyon terminating into Hillside Drive. Hillside Drive would be realigned from Canyon Boulevard to Forest Trail. This realignment would provide for continuous through traffic movement from Canyon Boulevard to Forest Trail. The existing intersections of Hillside Drive at Forest Trail and Canyon Boulevard would be eliminated by the realigned intersections. This alignment should facilitate continuous traffic flow and reduce conflicting movements at these intersections.
- DPW-31 Comment noted. Without evaluation of specific plans, this comment cannot be verified. All roadway improvements will be subject to future discretionary actions.

- DPW-32 The possible closure of Majestic Pines or Kelley Road is a separate issue that would significantly impact existing traffic conditions as well as future circulation. Since the NVSP does not propose closure of these roadways, the analysis does not assess the potential impacts. It would be better addressed in more detail by an analysis that would be able to examine all the potential circulation impacts. However, the most likely traffic/transit route from NVSP to Meridian will be via Minaret.
- DPW-33 Please see Response to Comment DPW-31 and Section 4.13 Mitigation Measure 4.13-5.
- DPW-34 The NVSP indicates that Berner Street will be rerouted, perpendicular to its current location, east of Minaret Road to intersect Forest Trail to the north. Access to underground parking from Berner would be provided west of the perpendicular bend. The rerouted connection to Forest Trail allows vehicles from the underground parking to easily use Forest Trail to the west to access Minaret Road. If Berner were to terminate into the parking access without being rerouted, the vehicles from the underground parking would all have to use Berner and the other residential streets to the east. Design elements concerning sight distance at the Forest Trail/Berner intersection will need to be considered prior to approval of this realignment.
- DPW-35 The EIR traffic analysis was performed in November 1990. The traffic analysis for the previous NVSP EIR indicated that peak Saturday conditions occurred in February and March. Therefore, new counts were not taken for this EIR since they would not be indicative of peak conditions. The counts taken for the previous EIR and for the Lodestar EIR were used. The Lodestar EIR counts, which were taken in March and April, had been adjusted to reflect peak conditions based on a comparison of lift ticket sales for peak weekends with sales during weekends on which the counts were taken.
- DPW-36 See Response to Comment DPW-35.
- DPW-37 The capacity reduction factor of 15% was used to account for the adverse effects of inclement weather on capacity. Inclement weather causes drivers to increase their start-up time, increase the headway between moving vehicles, and significantly reduce speeds in order to execute turning movements. The 15% reduction reasonable accounts for these adverse impacts.
- DPW-38 If the Sherwin Ski Area were not developed and the ski capacity of the MMSA were increased, you could expect a significant shift in ski-related travel. However, the General Plan indicates that parking for the MMSA will not be increased. If the cap on parking is maintained then additional trips to this facility would have to use non-vehicular modes such as transit, gondolas, walking, etc.

- DPW-39 The traffic generation for the NVSP used in the Lodestar EIR did not reflect the development levels proposed for the NVSP. Instead of the 2,000 hotel rooms and 227,000 square feet of commercial proposed for the NVSP, the Lodestar EIR examined 1,800 hotel rooms and 80,000 square feet of commercial. This discrepancy in Project size is reflected in the difference in projected LOS between the two EIR studies. Also, although the Critical Movement Analysis was used for both studies, slightly different applications of this methodology were used. Analysis for the NVSP was more conservative, including analysis of right-turns as potential critical movements.
- DPW-40 See Response to Comment DPW-39.
- DPW-41 Development of the NVSP is not expected to greatly increase the traffic levels on Meridian Boulevard. Using Meridian to access S.R. 203 to the east would be a less direct route than using Main Street. Therefore, substantially less traffic from North Village is expected to use Meridian.
- DPW-42 See Response to Comment DPW-27.
- DPW-43 Comment noted.
- DPW-44 Comment noted. Revision will be indicated on the revised DEIR.
- DPW-45 Based on the assumptions and cumulative traffic analysis, the EIR has identified that Lake Mary Road would need to be widened to four lanes from Minaret Road to Lakeview Road. If substantial reductions in vehicle trips can be achieved with increased transit, the need to widen Lake Mary between Lakeview and Minaret to four lanes may not be necessary.
- DPW-46 Conditions of Approval specified by the Town of Mammoth Lakes Public Works Department are duly noted.
- DPW-47 Conditions of Approval specified by the Lahontan Regional Water Quality Board' Guidelines are duly noted.
- DPW-48 Comment noted. A fee system as requested by the Town has been incorporated.
- DPW-49 Comment noted. No response required.
- DPW-50 The Project will conform to all regulations of the Department of Public Works.
- DPW-51 Please see Response to Comment DPW-50.
- DPW-52 Please see Response to Comment DPW-50. Also, please see Mitigation Measures

4.6-2 (a&b) and 4.6-3 on pages 4.6-6,7 of the Utilities Section.

- DPW-53 Please see Mitigation Measure 4.6-1 on page 4.6-6. The Project will conform to all requirements of the MCWD.
- DPW-54 Please see Response to Comment DPW-50.
- DPW-55 Please see Response to Comment MCWD-3.
- DPW-56 Please see Response to Comment MCWD-3.
- DPW-57 Comment noted.
- DPW-58 With the completion of the Dry Creek wells, the total water supply will be approximately 5,400 acre-feet per year. This reflects the current supply of 3,400 acre-feet of water and the projected 2,000 acre-feet per year from the Dry Creek Wells. This assumes production will remain constant. The MCWD has projected the total demand for water following General Plan buildout will be 5,946 acre-feet per year. This deficit will require implementation of further conservation measures and/or that the MCWD to develop additional water sources if full build-out is to occur.
- DPW-59 This comment is not part of the DEIR.
- DPW-60 This comment is not part of the DEIR.
- DPW-61 Please refer to Mitigation Measure 4.1-1.
- DPW-62 Comment noted. This is not a comment on the DEIR.
- DPW-63 Conditions of Approval specified by the Town of Mammoth Lakes Public Works Department are duly noted.
- DPW-64 Please refer to Mitigation Measure 4.1-1(a), (d), (e) and 4.1-2.
- DPW-65 See Response to Comment DPW-63.
- DPW-66 See Response to Comment DPW-63.
- DPW-67 See Response to Comment DPW-63.
- DPW-68 See Response to Comment DPW-63.
- DPW-69 The "little clock" is pointing north, which, in the case of Figure 2.1-2, is toward

the right side of the map.

- DPW-70 All comments received by the Town of Mammoth Lakes during the DEIR review period were incorporated in this document's Response to Comment Section.
- DPW-71 Please see page 4.2-9 and the discussion following Impact 4.2-2 which states that "Groundwater for the majority of the community is not anticipated to occur within 50 feet of the ground surface".
- DPW-72 Please see revised Mitigation Measure 4.13-3(c) page 4.13-4 of the Public Services/Fiscal section.
- DPW-73 Please see Housing Impact 4.5-2 of the EIR.
- DPW-74 See Response to Comment DPW-63.
- DPW-75 See Response to Comment DPW-63.

Memorandum

DWR

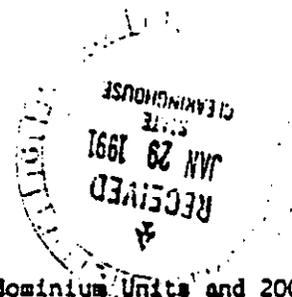
Date : DEC 27 1990

To :

1. Gordon F. Snow, Ph.D.
Assistant Secretary for Resources
2. Town of Mammoth Lakes
437 Old Mammoth Road, Ste. R
Mammoth Lakes, CA 93546
Attention: Bill Taylor

From : Department of Water Resources
Los Angeles, CA 90055

Subject: EIR for North Village Specific Plan for 400 New Condominium Units and 2000 New Hotel/Motel Lodging Units, dated December 1990, SCH 89040321



Your subject document has been reviewed by our Department of Water Resources staff. Recommendations, as they relate to water conservation and flood damage prevention, are attached.

After reviewing your report, we also would like to recommend that you further consider implementing a comprehensive program to use reclaimed water for irrigation purposes in order to free fresh water supplies for beneficial uses requiring high quality water supplies.

DWR-1

For further information, you may wish to contact John Pariewski at (213) 620-3951. Thank you for the opportunity to review and comment on this report.

Sincerely,

A handwritten signature in cursive that reads "Charles R. White".

Charles R. White, Chief
Planning Branch
Southern District

Attachments

Department of Water Resources Recommendations
for Water Conservation and Water Reclamation

To reduce water demand, implement the water conservation measures described here.

Required

The following State laws require water-efficient plumbing fixtures in structures:

- o Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings as follows:

"After January 1, 1983, all new buildings constructed in this state shall use water closets and associated flushometer valves, if any, which are water-conservation water closets as defined by American National Standards Institute Standard A112.19.2, and urinals and associated flushometer valves, if any, that use less than an average of 1-1/2 gallons per flush. Blowout water closets and associated flushometer valves are exempt from the requirements of this section."

DWR-2

- o Title 20, California Administrative Code Section 1604(f) (Appliance Efficiency Standards) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, and sink faucets, as specified in the standard approved by the American National Standards Institute on November 16, 1979, and known as ANSI A112.18.1M-1979.

DWR-3

- o Title 20, California Administrative Code Section 1606(b) (Appliance Efficiency Standards) prohibits the sale of fixtures that do not comply with regulations. No new appliance may be sold or offered for sale in California that is not certified by its manufacturer to be in compliance with the provisions of the regulations establishing applicable efficiency standards.

DWR-4

- o Title 24 of the California Administrative Code Section 2-5307(b) (California Energy Conservation Standards for New Buildings) prohibits the installation of fixtures unless the manufacturer has certified to the CEC compliance with the flow rate standards.

DWR-5

- o Title 24, California Administrative Code Sections 2-5352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. These requirements apply to steam and steam-condensate return piping and recirculating hot water piping in attics, garages, crawl spaces, or unheated spaces other than between floors or in interior walls. Insulation of water-heating systems is also required.

DWR-6

- o Health and Safety Code Section 4047 prohibits installation of residential water softening or conditioning appliances unless certain conditions are satisfied. Included is the requirement that, in most instances, the installation of the appliance must be accompanied by water conservation devices on fixtures using softened or conditioned water. DWR-7
- o Government Code Section 7800 specifies that lavatories in all public facilities constructed after January 1, 1985, be equipped with self-closing faucets that limit flow of hot water. DWR-8

Recommendations to be implemented where applicable

Interior:

1. Supply line pressure: Water pressure greater than 50 pounds per square inch (psi) be reduced to 50 psi or less by means of a pressure-reducing valve. DWR-9
2. Drinking fountains: Drinking fountains be equipped with self-closing valves. DWR-10
3. Hotel rooms: Conservation reminders be posted in rooms and restrooms.* Thermostatically controlled mixing valve be installed for bath/shower. DWR-11
4. Laundry facilities: Water-conserving models of washers be used. DWR-12
5. Restaurants: Water-conserving models of dishwashers be used or spray emitters that have been retrofitted for reduced flow. Drinking water be served upon request only.* DWR-13
6. Ultra-low-flush toilets: 1-1/2-gallon per flush toilets be installed in all new construction. DWR-14

Exterior:*

1. Landscape with low water-using plants wherever feasible. DWR-15
2. Minimize use of lawn by limiting it to lawn-dependent uses, such as playing fields. When lawn is used, require warm season grasses. DWR-16
3. Group plants of similar water use to reduce overirrigation of low-water-using plants. DWR-17
4. Provide information to occupants regarding benefits of low-water-using landscaping and sources of additional assistance. DWR-18

*The Department of Water Resources or local water district may aid in developing these materials or providing other information.

- | | |
|--|--------|
| 5. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction. | DWR-19 |
| 6. Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation. | DWR-20 |
| 7. Install efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Drip irrigation, soil moisture sensors, and automatic irrigation systems are a few methods of increasing irrigation efficiency. | DWR-21 |
| 8. Use pervious paving material whenever feasible to reduce surface water runoff and to aid in ground water recharge. | DWR-22 |
| 9. Grade slopes so that runoff of surface water is minimized. | DWR-23 |
| 10. Investigate the feasibility of using reclaimed waste water, stored rainwater, or grey water for irrigation. | DWR-24 |
| 11. Encourage cluster development, which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge. | DWR-25 |
| 12. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This aids ground water recharge. | DWR-26 |
| 13. To aid in ground water recharge, preserve flood plains and aquifer recharge areas as open space. | DWR-27 |

Department of Water Resources
Recommendations for
Flood Damage Prevention

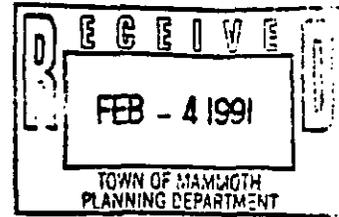
In flood-prone areas, flood damage prevention measures required to protect a proposed development should be based on the following guidelines:

1. It is the State's policy to conserve water; any potential loss to ground water should be mitigated.] DWR-28
2. All building structures should be protected against a 100-year flood.] DWR-29
3. In those areas not covered by a Flood Insurance Rate Map or Flood Boundary and Floodway Map, issued by the Federal Emergency Management Agency, the 100-year flood elevation and boundary should be shown in the Environmental Impact Report.] DWR-30
4. At least one route of ingress and egress to the development should be available during a 100-year flood.] DWR-31
5. The slope and foundation designs for all structures should be based on detailed soils and engineering studies, especially for hillside developments.] DWR-32
6. Revegetation of disturbed or newly constructed slopes should be done as soon as possible (utilizing native or low-water-using plant material).] DWR-33
7. The potential damage to the proposed development by mudflow should be assessed and mitigated as required.] DWR-34
8. Grading should be limited to dry months to minimize problems associated with sediment transport during construction.] DWR-35

- DWR-1 The Project will conform to all State regulations regarding water conservation. See also Mitigation Measures 4.14-1 and 4.14-2 of the Energy Conservation Section.
- DWR-2 Please see Response to Comment DWR-1.
- DWR-3 Please see Response to Comment DWR-1.
- DWR-4 Please see Response to Comment DWR-1.
- DWR-5 Please see Response to Comment DWR-1.
- DWR-6 Please see Response to Comment DWR-1.
- DWR-7 Please see Response to Comment DWR-1.
- DWR-8 Please see Response to Comment DWR-1.
- DWR-9 All State and local water conservation recommendations will be implemented, where applicable.
- DWR-10 Please see Response to Comment DWR-9.
- DWR-11 Please see Response to Comment DWR-9.
- DWR-12 Please see Response to Comment DWR-9.
- DWR-13 Please see Response to Comment DWR-9.
- DWR-14 Please see Response to Comment DWR-9.
- DWR-15 Please see Response to Comment DWR-9.
- DWR-16 Please see Response to Comment DWR-9.
- DWR-17 Please see Response to Comment DWR-9.
- DWR-18 Please see Response to Comment DWR-9.
- DWR-19 Please see Response to Comment DWR-9.
- DWR-20 Please see Response to Comment DWR-9.
- DWR-21 Please see Response to Comment DWR-9.

- DWR-22 Please see Response to Comment DWR-9.
- DWR-23 Comment noted. No response is required.
- DWR-24 Comment noted. No response is required.
- DWR-25 The North Village Specific Plan encourages cluster development, therefore, reducing the impact on land use. By minimizing the amount of impervious maximum possible, the groundwater recharge is maintained.
- DWR-26 All State and local flood damage prevention measures will be implemented, where applicable.
- DWR-27 Please see Response to Comment DWR-26.
- DWR-28 Please see Response to Comment DWR-26.
- DWR-29 Please see Response to Comment DWR-26.
- DWR-30 Please see Response to Comment DWR-26.
- DWR-31 Please see Response to Comment DWR-26.
- DWR-32 Please see Response to Comment DWR-26.
- DWR-33 Please see Response to Comment DWR-26.
- DWR-34 Please see Response to Comment DWR-26.
- DWR-35 Please see Response to Comment DWR-26.

Ellen Hardebeck
Control Officer



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short St. Suite #6 - Bishop, CA 93514
(619) 872-8211

GBUAPCD

January 30, 1991

Mr. Randy Mellinger
Planning Director
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, California 93546

Subject: Comments on the Draft EIR for North Village

Dear Mr. Mellinger:

I have reviewed portions of the Draft EIR for North Village (December 1990) and find that the project as proposed will significantly threaten the future air quality of the Town. The Draft EIR shows that traffic related to the project will increase peak traffic by 64,000 vehicle miles travelled (VMT) per day. This traffic will add to the already high PM-10 concentrations by increasing emissions from re-entrained road cinders. In addition, increased VMT may also increase carbon monoxide (CO) to levels that will exceed the State and federal standards. Although the EIR alludes to a transportation plan to reduce vehicle related pollutants, this plan is not identified.

GBUAPCD-1

GBUAPCD-2

The recently adopted Air Quality Management Plan for the Town of Mammoth Lakes relies on a total increase in traffic over the next 15 years of 40,320 vehicle miles travelled per day. This VMT growth limit will help maintain the air quality at levels below the Federal ambient air quality standard for particulate matter. The VMT associated with North Village, by itself, is much greater than the VMT growth allowed for all the projects. Trip reduction measures must be implemented by the North Village project to reduce the overall VMT to a level that will conform with the goals of the Air Quality Management Plan.

GBUAPCD-3

A trip reduction strategy for North Village should be developed with consideration for other new projects that may increase the peak winter-time VMT in the Town. The 40,320 VMT limit is a growth allowance for the cumulative impact of all projects. The District has permitting authority for new developments under District Rule 216, New Source Review Requirements for Determining Impact on Air Quality Secondary Sources. Unless the overall peak VMT growth can be reduced to levels that conform to the AQMP, the District will not be able to issue a permit.

GBUAPCD-4

GBUAPCD-5

A successful trip reduction strategy may also prevent exceedances of the State and federal CO standards. The EIR includes a proposal to set buildings 50 feet away from roadways to escape carbon monoxide violations. Although this is a practical solution to prevent exposure to high CO concentrations, it is not an acceptable strategy for compliance with the State and federal standards.

GBUAPCD-6

Please call me if you have any questions regarding my comments.

Sincerely,



Duane M. Ono
Deputy Air Pollution Control Officer

DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT

January 29, 1991

Mr. Randy Mellinger
Planning Director
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, California 93546

Subject: Comments on the Draft EIR for North Village

Dear Mr. Mellinger:

I have reviewed portions of the Draft EIR for North Village (December 1990) and find that the project as proposed will significantly threaten the future air quality of the Town. The Draft EIR shows that traffic related to the project will increase peak traffic by 64,000 vehicle miles travelled (VMT) per day. This traffic will add to the already high PM-10 concentrations by increasing emissions from re-entrained road cinders. In addition, increased VMT may also increase carbon monoxide (CO) to levels that will exceed the State and federal standards. Although the EIR alludes to a transportation plan to reduce vehicle related pollutants, this plan is not identified.

The recently adopted Air Quality Management Plan for the Town of Mammoth Lakes relies on a total increase in traffic over the next 15 years of 40,320 vehicle miles travelled per day. This VMT growth limit will help maintain the air quality at levels below the Federal ambient air quality standard for particulate matter. The VMT associated with North Village by itself, is much greater than the VMT growth allowed for all the projects. Trip reduction measures must be implemented by the North Village project to reduce the overall VMT to a level that will conform with the goals of the Air Quality Management Plan.

A trip reduction strategy for North Village should be developed with consideration for other new projects that may increase the peak winter-time VMT in the Town. The 40,320 VMT limit is a growth allowance for the cumulative impact of all projects. The District has permitting authority for new developments under District Rule 216, New Source Review Requirements for Determining Impact on Air Quality Secondary Sources. Unless the overall peak VMT growth can be reduced to levels that conform to the AQMP, the District will not be able to issue a permit.

A successful trip reduction strategy may also prevent exceedances of the State and federal CO standards. The EIR includes a proposal to set buildings 50 feet away from roadways to escape carbon monoxide violations. Although this is a practical solution to prevent exposure to high CO concentrations, it is not an acceptable strategy for compliance with the State and federal standards.

Please call me if you have any questions regarding my comments.

Sincerely,

Duane M. Ono
Deputy Air Pollution Control Officer

GPUAPCD-1 The VMT estimates assumed worst case conditions without a) an improved mass transit; b) the bicycle routes; and c) the improved road conditions. These measures are not easy to quantify under present conditions of a programmed EIR. However, these are definite air quality mitigation measures. As noted in the Transportation Management Subsection (p. 4.7-30), the Project will provide on-site shuttle service along Minaret Road to connect the southern project boundary. This is a specific mass transit measure to reduce both carbon monoxide and PM₁₀ (cinders) through trip reduction (measure 2 of the Air Quality Plans).

In addition, the following measures to reduce Project-generated vehicle trips shall be identified as mitigation measures in the EIR:

- o Regarding support of public transit, the North Village Project could be required to contribute "in lieu" fees for transit system improvements as an alternative to certain of the proposed physical traffic improvements if the transit system design study determines that the need for the roadway capacity improvements would be obviated by the reduced level of vehicular trips potentially resulting from increased transit ridership due to an improved transit system. It is anticipated that the continued need for certain roadway improvements and the levels of developer financial participation in support of an improved transit system would be determined by the upcoming transit system study.
- o Mitigation measures requiring provisions for pedestrian and bicycle facilities. Bicycle facilities could include bicycle paths and routes, locking bike racks, as well as on-site shower facilities for Project employees who bicycle to work. Pedestrian facilities could include an integrated system of walkways separated from roads connecting the various areas of the site.
- o Mitigation measures requiring provisions for transit facilities. These could include bus stop shelters, bus turnouts, bus layover spaces, etc.

GPUAPCD-2 Please refer to Response to Comment GBUAPCD-1.

GPUAPCD-3 Please refer to Response to Comment GBUAPCD-1.

GPUAPCD-4 Please refer to Response to Comment GBUAPCD-1.

GPUAPCD-5 Please refer to Response to Comment GBUAPCD-1.

GPUAPCD-6 Please refer to Response to Comment GBUAPCD-1.

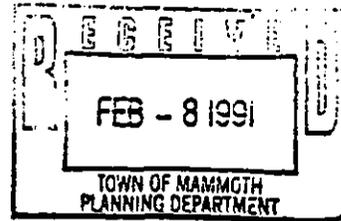
MCWD

February 6, 1991

MAMMOTH COUNTY WATER DISTRICT

MCWD

Randy Mellinger
Planning Director
Town of Mammoth Lakes
Post Office Box 1609
Mammoth Lakes, California 93546



Re: Comments On Draft Environmental Impact Report for North Village Project

Dear Mr. Mellinger:

The Mammoth County Water District has reviewed the Draft Environmental Impact Report for the North Village project and has the following comments.

As a general comment relating to surface water drainage, another alternative that may be beneficial for surface waters of the Mammoth Creek watershed is to provide on-site treatment and discharge to drainage facilities that would direct the flows to Mammoth Creek rather than to Murphy Gulch. Expecially in dry years this could add some measurable increased flow in Mammoth Creek.

MCWD-1

Page 1-1:

It is stated under the "Summary of Proposed Action" that the proposed project includes 60,000 square feet of commercial/retail space. As indicated on page 4.5-12, there is equal to 191,000 square feet of commercial/retail space and 60,000 square feet of restaurant space involved in the project.

MCWD-2

Page 1-16:

It is stated that the proposed project will create, through employment, an increase in population of as much as 2,828 people with an accompanying housing demand of 1,230 units. This increase in population and housing will create additional water and wastewater demands. Based upon the premise that these units would be multifamily buildings, it is projected that the increased water demand would equal approximately 219,000 gallons per day (245 acre-feet per year) and the increased wastewater generated would equal approximately 192,000 gallons per day.

Page 1-17:

It is stated that the Mammoth County Water District projection of total water demand for this project is 200,000 gallons per day which is equivalent to 218 acre-feet per year. This estimate was prepared in March, 1989. Subsequent to that estimate (August, 1989), a study was performed by the District which identified specific water and wastewater demands in relation to specific types of domestic users within the community which increased the accuracy of projecting water and wastewater demands that may be created by a proposed project. Also, at the time of the March, 1989 projection, it was not clear as to what types of uses the commercial/retail portion represented. Utilizing the information contained in the Draft EIR, the District now estimates that a total water demand of 341,000 gallons per day (381 acre-feet per year) would be created by this project. This amount, in addition to demands created by other potential projects, would require the development of additional water sources that have been identified by the District.

MCWD-3

Page 1-18:

It is stated that the proposed project is anticipated to generate a total of approximately 459,100 gallons of wastewater per day. Based upon this estimate of wastewater generated, the total amount of water demand would be projected to amount to approximately 656,000 gallons per day. Based upon the information provided in the Draft EIR, the District estimates that the total amount of wastewater generated would equal 308,000 gallons per day. Flow projections for demands created by restaurants and hotel rooms make up the major differences between the District calculations and those that the Draft EIR utilizes (see page 4.6-10, #13). Once again, the District is utilizing data from the study it performed in August, 1989 to comprise its projections.

MCWD-4

Page 4.2-6 (Table 4.2.1):

It is stated in Table 4.2.1 that water quality problems exist in Well No. 1 relating to elevated iron and low pH. Laboratory analysis results show that levels of pH and iron meet State Health Department water quality standards. It is also stated that water quality problems exist in Well No. 10 relating to low pH. Laboratory analysis results show that the pH of Well No. 10 water is neutral (7.0-7.5). District wells 6 & 10 produce water that does not meet iron and manganese standards, therefore water from both wells is treated for iron and manganese removal prior to being pumped into the District's water distribution system.

MCWD-5

MCWD-6

MCWD-7

Page 4.6-1:

It is stated that the elevation of Lake Mary is 8917 feet. The maximum elevation that the District can maintain at Lake Mary is equal to 8912.7 feet. It should be mentioned under the description of the District's surface water entitlement that maintenance of minimum lake level and stream flow rates impact the ability to fully utilize the 2,760 acre-feet allotted especially during below normal precipitation years. It is also stated that District wells 6 & 10 are located in Snowcreek. They are actually located within the Snowcreek golf course area south and west of Ranch Road in Old Mammoth.

MCWD-8
MCWD-9

Table 4.6.1:

This table requires updating. The Mammoth Knolls pumping station and pressure reducing station has been completed and is in service. Water is pumped by a 50 horsepower motor and pump at a rate of 400 gallons per minute. Also, the Table indicates that the electric motor at the I & M Plant is 100 horsepower when it is actually 150 horsepower.

MCWD-10
MCWD-11

Page 4.6-3:

It is stated that the project site receives water directly from District Well No. 1. The main water supply source for this project will be water from the District's Lake Mary source with future supplies projected from the Dry Creek well sites. Water can be supplied to the project site from District wells 1, 6 & 10 but is not a matter of routine operation.

MCWD-12

Page 4.6-5:

It should be noted that development of the well field in the Dry Creek area is currently under environmental review and it is questionable as to whether the first Dry Creek well can be developed during the summer of 1991.

MCWD-13

Page 4.6-7:

Once again it is stated that the proposed project will generate approximately 459,100 gallons of wastewater per day. The District projects that approximately 308,000 gallons of wastewater will be generated per day.

MCWD-14

If you should have any questions or wish to discuss any of the comments, please contact either myself or Jim Kuykendall at the District offices at 934-2596.

Sincerely,

MAMMOTH COUNTY WATER DISTRICT

Gary Sisson

GARY SISSON
Operations and Maintenance Manager

GS:nv-eir

- MCWD-1 Comment noted. To undertake this diversion, agreement would need to be reached between the Town of Mammoth Lakes, RWQCB, Department of Water Resources, DFG and possibly the City of Los Angeles who has water rights within this regions. No response is required.
- MCWD-2 While 60,000 square feet of commercial/retail space is specified as part of the Plaza area, there is a potential for an additional 191,000 square feet of commercial space in the area surrounding the Plaza development.
- MCWD-3 Impact 4.6-1 on page 4.6-5 has been revised to reflect MCWD's new Project water demand estimate of 341,000 gallons per day (381 acre-feet per year). This change is the result of increased accuracy of specific generation factors associated with different land uses and a better understanding of the Project description.
- MCWD-4 Impact 4.6-3 on page 4.6-7 of the Utilities Section has been revised to reflect the MCWD's projected Wastewater estimate of 308,000 gallons per day for the Project. This estimate is used because the generation factors utilized by the MCWD are more specific to the Town of Mammoth Lakes than those used in the EIR. The difference in the two projections is a result of different generation factors for hotels and restaurants.
- MCWD-5 Comment noted. This information has been included in the document. No response is required. See Hydrology Section of the revised EIR.
- MCWD-6 Comment noted. This information has been included in the document. No response is required. See Hydrology Section of the revised EIR.
- MCWD-7 Comment noted. This information has been included in the document. No response is required. See Hydrology Section of the revised EIR.
- MCWD-8 Lake Mary's maximum elevation is 8912.7. In addition, the District's 2,760 acre-feet allotment of water to Lake Mary, discussed on page 4.6-1, is impacted by minimum lake levels and stream flow rates.
- MCWD-9 Commentor is correct. Well #'s 6 and 10 are located within the Snow Creek golf course area south and west of Ranch Road in Old Mammoth.
- MCWD-10 Table 4.6-1 is incorrect. The Mammoth Wells Pumping Station has been completed and is in service, pumping water by a 50 horsepower motor at a rate of 400 gallons per minute.
- MCWD-11 Table 4.6-1 is inaccurate. The I&M Plant is powered by a 150 horsepower electric motor.

- MCWD-12 The Project's main water source will be Lake Mary and future supplies projected from the Dry Creek Wells. Water from laos 1, 6, and 10 can also supplement water demand.
- MCWD-13 The Dry Creek Wells are currently undergoing environmental review and the completion of the first well is still questionable.
- MCWD-14 Please see Response to Comment MCWD-4.

MLB

P.O. Box 431
Mammoth Lakes CA 93546
February 4, 1991

Mammoth Lakes Planning Commission
P.O. Box 1609
Mammoth Lakes CA 93546

Regarding: North Village Specific Plan,
Draft Environmental Impact Report

I have reviewed the most recent edition (December 1990) of the North Village Specific Plan Draft Environmental Impact Report (NVSP DEIR). I have also reviewed my comments, dated May 11, 1989, on a previous version of the NVSP DEIR. I will herein occasionally refer to those previous comments and that previous DEIR. I have lost track of how many NVSPs were published. When comparing the aforementioned DEIRs, therefore, I will refer to them as 12/90 DEIR and 4/89 DEIR. Hereinafter I will use abbreviations that are used in the DEIRs, without further explanation.

I want to comment first on the VAST improvement in the quality of most of the analyses. I am impressed with the professionalism of the 12/90 DEIR. There are still some problems, omissions and discrepancies, however, and I will comment on what I consider to be the most important ones.

Numerous times in reading both DEIRs, I asked myself what was the difference between "shall" and "should". I have the feeling that the two words are not used interchangeably, yet they are not defined in the DEIRs as having

MLB-1

distinctly different meanings. Is there a real difference? In common usage, "shall" indicates a necessary action and "should" indicates an action subject to judgment. Is this true for these DEIRs? Could the developer choose to disregard all the "should" recommendations? In my 4/89 DEIR comments I asked about this in regard to several different subjects, but I find no clarification in the 12/90 DEIR. Please define the use of these two words when you write the final EIR.

MLB-2

The visual and vegetation changes accompanying the development will be glaringly obvious to all residents and frequent visitors. The evaluation of these impacts in the 12/90 DEIR is not appropriate. I have a real problem, first, with the repeated references to "vacant" land (twice on page 4.4-8 above). Be assured that those 25+ acres are NOT vacant. They support hundreds of mature trees and bushes, with wildlife, as described on pages ~~4.3-2~~ 4.3-2 and 4.3-3. Impact 4.3.4 states, "Development of the project would result in the loss of 25 acres of fragmented native wildlife habitat." Because of the size of the proposed development the impacts as described on pages 4.3-4, 4.3-5 and 4.3-8 cannot be mitigated to less-than-significant. Do not try to fool anyone with the semantics. I suggest that the scale of the development be reduced, in building heights to moderate visual intrusion and in acreage to help "preserve and maintain the unique natural setting and mountain resort character of Mammoth Lakes..." and "... the natural environment and wildlife of the area," as quoted from the Town of Mammoth Lakes General Plan on 12/90 DEIR page 4.4-4.

MLB-3

MLB-4

Impact 4.4-5 states, "The proposed project represents an opportunity to see infill development of existing land areas."

Actually, it necessitates infill development. Contrary to the evaluations of this as beneficial and not significant, I consider it to be a significant impact and not beneficial to the environment. Though the project may be judged by some to be financially advantageous, the document analyses are concerned primarily with impacts to the environment.

MLB-5

In my 4/89 DEIR comments (page 2) I referred to the Appendix K regarding air quality. Most of the concerns were handled well in the 12/90 DEIR. Three points still concern me. First, will there be wood-burning appliances in the project area? Item 7 of the critical Study indicates no plans for them, but the 12/90 DEIR assumes that all 2400 units will have them (page 4.8-10). Has a decision been made? Second, the CO "hot spot" analysis indicates that a distance of 50 feet from the roadside would be sufficient for the required safety margin. What will be done to discourage people from traveling or loitering in the zone of potential high exposure? Minimum setbacks for walkways and bus shelters? Will building ventilation systems be drawing in this CO- and PM_{10} -laden air? Third, I encourage the planners to work more diligently on discouraging the use of private vehicles and encouraging the use of public transportation, so as to more surely reduce total vehicle miles and inefficient "cold start" idling and driving.

MLB-6

MLB-7

MLB-8

Noise generated by the proposed development would extend beyond the limits of the project (page 4.3-8 and intuitively obvious). Section 4.9 does not evaluate the effects of the noise on people in established residential areas. Buildings within the project can be designed and constructed to minimize noise transmission, but retrofitting surrounding homes would be very difficult and is not even mentioned.

MLB-9

MLB-10

What would be the dBA at the project boundaries and in surrounding homes? Also, has the additional noise of tire chains been added into the calculations? If not, the calculations need to be re-done, as chains are a VERY noticeable source of noise.

MLB-11

The fiscal impacts are evaluated to be advantageous to the Town of Mammoth Lakes, and disadvantages to Mono County, when calculated on the basis of required building/development fees, anticipated property values and various tourist-trade taxes. The latter two are based on the assumption of a "successful" project. As I had mentioned in my 4/29 DEIR comments, there is no occupancy rate speculation for the hotels or condos, there is no discussion of project financing or debt structure, there is no justification for believing that retail space would be rented. Page 4.4-10 states, "While the existing retail centers have relatively high vacancy rate [sic], it is believed this is a result of scattered locations, quality and design of the available space." What makes the North Village developer believe that they can do much better? The phased development may save both the environment and the developer, for if the national economy and/or the local climate cannot support the initial phase, then no more would be built, and the Town would still have the benefits of the gondola, transit system and road/utility improvements.

MLB-12

MLB-13

Speaking of road improvements, who is going to pay for them? I cannot find that in the DEIR and I'm sure that it will be a significant expense for someone. Why is it not mentioned?

MLB-14

"Fundamental to the North Village Plan is the emphasis

on pedestrian orientation and accessibility" (page 2-8). So why are so many road changes going to be required, especially extra lanes? Is this a case of the California philosophy of "the roads are crowded, so let's build more roads so we can put more cars on them"? Many people will argue that you will never get Californians out of their cars. I disagree. I think they are trainable, that if you can make it convenient for them to use alternative transport modes, they will use the alternatives. The Traffic Study in the Appendix is impressive, with its tables and maps, but I think it misses the whole point of trying to reduce total traffic. (Also, it may not be valid to base projections of peak winter traffic on a survey performed on a quiet Friday, October 19, 1990.)

MLB-15

MLB-16

The closure of Berner Street is a matter of convenience for the developer, and of safety and convenience for drivers on Minaret Road. There is no mention, however, of the adverse impacts to area residents, specifically of routing Berner Street traffic and hotel access traffic on to Forest Trail east of Minaret Road. The Center for Settlement Services, Inc., in a summary of NVSP that was prepared last summer, dedicates half of page 20 to this section of road and points out the hazards of skier traffic on what is locally known as Lower Forest Trail. I believe that the DEIR does not adequately address the problem. The 4/89 DEIR dismissed it as not being a problem (please see page 5 of the 4/89 DEIR Appendix A and page 9 of my 4/89 DEIR Comments), even though traffic increases were projected to be 60% for peak hour and 87% for peak day vehicles. There are already significant numbers of full-size buses using Lower Forest Trail, along with numerous skiers' autos and occasional full-size gasoline tank trucks and tractor-trailers. Personal observation over

MLB-17

several years). I seriously doubt that drivers of buses and private vehicles leaving the hotel will go up to Minant Road for access to Main Street - they will instead go down Forest Trail. And once they discover this short cut, they will use it exclusively so as to avoid the Minant Road traffic and traffic lights. Considering the nature of the roadway and the residential quality of the neighborhood, this will be a highly significant and most undesirable impact of the North Village development. I seriously suggest that this issue be scrutinized to determine how to keep the North Village traffic on the arterials where it should be.

The anticipated population increase seems to be settled now at 2228, based on 1612 permanent employees and their family/friend cohabitants (page 1-16). Housing demand is projected to be 1230 units. One of the most critical socio-economic mitigation measures is stated on page 4.5-10:

"100% of housing for employees generated by users within the project should be provided onsite ..." I commend the developer for being willing to include this statement in the DEIR, but I suggest that "should" be changed to "shall." Hopefully, by the time construction actually begins, the Town will require such provisions from all developers. It is long overdue.

MLB-18

Water is a subject that has been in the news frequently in the past few years, and rightly so. Yet many people still refuse to acknowledge that the present weather conditions might in reality be the new climate patterns. Clean water is very easy to waste and becoming very difficult to produce. It is because of these two factors that I find the water and sewer figures so intriguing. According to pages 1-17 and 1-18 water demand will be 200,000 gpd and wastewater

MLB-19

generated will be 459,100 gpd. I am most interested in learning how 259,100 gpd of effluent will be generated within the North Village project. In the final EIR, please explain how these "magic pipes" work. I suspect that the MWD and others would also be interested. Even if they have to clean it up, any method that can more than double the water supply should excite the whole state of California.

off, however, this is a case of a migrant (repeated throughout the DEIR) rather than magic pipes, the whole analysis needs reevaluation. The wastewater estimate is based on full occupancy of the rental rooms but does not include employee housing units. As the hotels will not always be full, is the savings there expected to cover the employee housing needs? More importantly, there are no details at all on water demand. How much is for what uses? Does the figure include irrigation, public and hotel laundry facilities, employee housing units, construction needs, all 2828 people expected in the population increase? I doubt that 200,000 gpd would be sufficient. (My calculations convert it to 224 acre-feet per year, but that is close enough to the published value of 213.) If the sewage flows are calculated back to water demand (assuming actual waste volume = 0 and irrigation use = 0, to simplify things), I come up with water needs of about 515 acre-feet per year. Is this now a significant impact? I believe so, most especially when irrigation is added.

Many conservation measures can drastically reduce the need for clean water, and many good ones are listed in the mitigation measures. Even WITH all of these mitigations, the need will be on the order of hundreds of acre-feet per year. There is acknowledgment that the Dry

Creek wells (or some other source) must be developed but no consideration of the environmental consequences of that development, which I believe there should be. It may be years before Dry Creek is developed and we may go through several environmental documents with the U.S. Forest Service, but I believe that the impacts should at least be mentioned in this DEIR. Just because the MWD claims to be able to develop the source does not reduce the significance of environmental impacts.

MLB-21

Appendix F of the 4/89 DEIR stated a concern by the Lahontan Region, California Regional Water Quality Control Board regarding run-off. The 12/90 DEIR Appendix C for erosion control does not answer their concerns directly, as it pre-dates these DEIRs by several years (1983, as noted on page 4.2-7). Have their concerns of 1989 been answered and appropriate mitigations included in the 12/90 DEIR?

MLB-22

It is claimed in section 4.6-5 that there would be no significant impact on solid waste disposal. Again, just because the supplier claims that he can handle it does not reduce the impact's significance. The NVSP admits that development of North Village alone will increase the Town population by over 50% and the Town PM_{10} by 40%. Even with a concerted effort in recycling, I expect that it would increase garbage by at least 30%. Has anybody asked what we do when Benton Crossing gets full? Spend 15 years building North Village and close it down five years later? Granted, this is not a North Village problem alone but it is a North Village problem in part.

MLB-23

MLB-24

The focus of the NVSP is the gondola base and the possibility that it provides for convenience in lodging and

skiing, considered desirable because the two primary base lodges are now about maxed out for convenience. The easement seems to be a problem still, and the visual impacts of the proposed gondola route would be drastic. Hence the developers considered another route for the gondola? Perhaps a short leg above the present Travelodge and Alpine Lodge, then around the established housing in the Slope area. It could run above the ski-back trail and end upslope from Warning Hut II for efficiency in spreading the skiers throughout the Hut II area, or even continue toward the Main Lodge to spread them out even farther. Perhaps even close Forest Trail just west of Minaret Road and put the base station there at the bottom of the ski-back, with unobstructed pedestrian access from the Blaze via a bridge over the remaining-open Canyon Boulevard. It is another option.

MLB-25

There are several obvious errors that should be corrected, but a few others may be misleading if they go unnoticed into the final EIR. On page 7-4, the first paragraph under Alternative Two includes "... east of Mendion Road." As Mendion runs east-west and is not adjacent to the proposed development, I expect that should be changed, presumably to "Minaret Road." On page 7-12 under Housing: "A 30% decrease in housing construction will result in a decrease in housing demand of 896 units." I believe it should be "... decrease in housing demand to 896 units." The permanent jobs are consistently listed as 1612 but the temporary construction jobs still vary between 106 (page 4.5-8) and 159 (page 1-16).

MLB-26

MLB-27

MLB-28

Impact 4.4-7 states, "The proposed project is anticipated to generate a peak population of 2300 people on-site." As

There will be 2400 rental units, this figure of 2300 people implies that there will never be full occupancy. If the 1612 employees work at three equal shifts of 537 each, and we assume no walk-in customers, the maximum paying renters would be fewer than 1800. At an average of two renters per unit, only 900 units would be rented, an occupancy rate of 37% at maximum. Could this be right? If not, please adjust evaluation of the impacts accordingly.

MLB-29

Finally, "A final assessment shall be made by the North Village Design Review Committee and shall be favorably ruled by the Planning Commission on the approval of land right of way." (page 1-12). It sounds to me as though the Planning Commission has already decided, before the assessment has been made. Please clarify this point.

MLB-30

Thank you for your consideration of my concerns.

Sincerely,

Mary Lou Birkhimer

MARY LOU BIRKHIMER

- MLB-1 According to CEQA Guidelines Section 15005 states:
- 15005(a) '..."shall" identifies a mandatory element which all public agencies are required to follow.'
- 15005(b) 'Should' identifies guidance by the Secretary of Resources based policy considerations contained in CEQA, in the legislative history of the statute, or in federal court decisions which California courts can be expected to follow. Public agencies are advised to follow this guidance in the absence of compelling, countervailing considerations."
- MLB-2 See Response to Comment MLB-1.
- MLB-3 Comment noted. See revised EIR, specifically Mitigation Measures 4.3-1(a) to 4.3-1(f) which are intended to preserve as much native vegetation as possible.
- MLB-4 Comment noted. See Response to Comment MLB-3.
- MLB-5 Comment noted.
- MLB-6 The assessment assumed 'worst case' when woodstoves are included in the plans. It does not necessary mean they will be included.
- MLB-7 Mitigation Measure 4.8-3 discourages the use of 50 foot buffer zone.
- MLB-8 See Response to Comment RLM-21. Mitigation Measure 4.8-3 is specifically designed to encourage mass transit.
- MLB-9 Noise analyses were performed for the area of impact of the Project.
- MLB-10 Table 4.9.3 provides data inclusive of the Project boundaries.
- MLB-11 Vehicular traffic noise estimates make allowance for standard noise sources, including the use of chains.
- MLB-12 The fiscal analysis is based on the assumption that once projected commercial space becomes available, it will be occupied, while hotel occupancy rates are based on a market study and financial analysis prepared by Kenneth Leventhal and Company, 1989 and a phone conversation with Steve Black of Mammoth Reservation Bureau.
- MLB-13 The development of the North Village will occur over a 10 to 15 year period based on the market conditions.

MLB-14 The EIR identifies what circulation improvements are needed to mitigate significant impacts. The Town of Mammoth Lakes, through conditions of development, identifies who is specifically responsible for funding and/or implementing the various mitigation measures based on the findings of the EIR, and their independent assessment of overall needs. Alternatively, transit may be instituted in lieu of some or many of the circulation improvements. Fiscal participation by NVSP projects in transit will also be determined by the transit.

MLB-15 Ms. Birkhimer's opinions are noted.

MLB-16 See Response to Comment RLM-21 and MLB-15.

MLB-17 By definition, the PM peak hour analysis considers traffic conditions as they would occur during the busiest afternoon hour of a winter Saturday. Traffic volumes during other times and days would be expected to be less.

The installation of a traffic signal at Minaret Road/Forest Trail is not expected to significantly increase traffic on Forest Trail east of Minaret Road. A substantial portion of the NVSP traffic would not use Forest Trail Road to the east since the primary access to North Village is through Minaret, to the south of Forest Trail. Traffic using Forest Trail would also be able to use Sierra Street to the south to connect to Main Street. The intersection of Sierra/Main Street was evaluated in this EIR. This intersection is close to warranting a signal with projected traffic volumes on Sierra Street. The left turns from Sierra are expected to operate at a poor LOS due to delays caused by cross traffic. This analysis would also apply to the intersection of Forest Trail/Main Street, which would have similar traffic characteristics. The installation of a signal at either location would cause traffic to divert from the unsignalized location thereby warranting the signal. Given the similarity of the two locations, a signal at Sierra would probably be preferable since it would provide greater spacing between signals on Main Street.

MLB-18 Comment noted and included in the EIR.

MLB-19 Comment noted. No response required.

MLB-20 Please see Response to Comment MCWD-3 and 4, Table 4.6.2 on page 4.6-3 in the Utilities Section.

MLB-21 Please see Response to Comment ORR-1.

MLB-22 Please see page 4.2-10, Mitigation Measure 4.2-3, which requires that a Waste Disposal Report be filed with the Lahontan Regional Water Quality Control Board to ensure the protection of water quality.

- MLB-23 Comment noted. CEQA (Appendix G item e) states that a Project has a significant impact on solid waste if it breaches published national, state, or local standards relating to solid waste or litter control. An alternative method is to determine the availability of landfill space with sufficient capacity to serve the Project. Since the Project will comply with all regulatory standards and the Benton Crossing Landfill has sufficient capacity, the Project was not considered as having significant effect on solid waste.
- MLB-24 The cumulative impact of buildout of the General Plan is anticipated to produce approximately 108,593 pounds of solid waste per day. Buildout will quicken the pace at which the landfill approaches capacity and results in the need for the Town of Mammoth Lakes to find an alternative landfill facility.
- MLB-25 Alternative routes for the proposed gondola have not been considered in this EIR. When more finalized plans for the proposed gondola are presented, they will be subject to design review and the approval of the Town of Mammoth Lakes Planning Commission. At this time, alternative gondola routes may be considered. However, an easement for the gondola has existed along the identified routes for seven years.
- MLB-26 Comment noted. The reference to "east" has been deleted and changed to "south."
- MLB-27 The 896 units refers to the 30% decrease to an assumed total of 2,987 housing units. During the comment review period, an error in the total number of housing units was discovered. The current number of housing units is 2,400 housing units. Therefore, a 30% decrease of 2,400 housing units is 720 units.
- MLB-28 Commentor is correct.
- MLB-29 The build-out of North Village, anticipated to take 10-15 years, "could include the construction of approximately 2,000 new hotel, motel lodging units bringing the total of 2,250 units to the area (250 are existing). These are not expected to be month-to-month "rental units" but daily lodging units. The build-out will be completed depending on the actual yearly-addressed peak populations. Please refer to the marketing study prepared by Pannel, Kerr, Forster (PKF). The impact for 4.4-7 should read:
- "The proposed Project is anticipated to generate a peak population of 2,300 people on-site during the next 10-15 years."
- MLB-30 The page reference is to the EIR summary, where the impacts and mitigation measures are presented without background. For a full discussion of this issue, see section 4.4, Land Use and Planning. It should be noted that several important

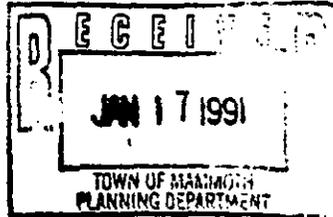
entitlements must be obtained prior to development of the gondola, including a Forest Service Use Permit for expansion of the MMSA. As noted elsewhere in this EIR, the design of the gondola is conceptual at this time. However, implementation of the gondola is central to the traffic reduction strategy of the North Village project.

MUSD



MAMMOTH UNIFIED SCHOOL DISTRICT

SUPERINTENDENT
RICHARD A. MCA TEER



BOARD OF TRUSTEES
NANCY O'KELLY
KEN COULTER
MICHAEL BERGER
LAUREEN AGEE
R. GARY JONES

January 10, 1991

Mammoth Lakes Planning Department
Post Office Box 1609
Mammoth Lakes, California 93546

Re: Comments on North Village Specific Plan Paragraph 4.13-3

Gentlemen:

The Mammoth Unified School District agrees that this project will have a significant impact on the school district.] MUSD-1
]

The District hereby requests that you include, along with the impact fees, that additional land also be provided to mitigate this project.] MUSD-2
]

Secondly, that the school impact fees themselves be increased when the State allows them to be to the allowed State rate.] MUSD-3
]

Your inclusion of the above will be greatly appreciated.

Sincerely,

Richard A. McAteer
Superintendent

RAM:st

MUSD-1 Comment noted. No response required.

MUSD-2 Page 4.13-4 has been revised to include Mitigation Measure 4.13-2(b): A portion of the Project site, or additional off-site land, shall be set aside for the construction of a new elementary school.

MUSD-3 In February, 1991, the MUSD approved collection of school impact fees provided under AB 2926. The fees are \$1.10 per square foot of residential and \$0.26 per square foot of commercial development. Please see the Public Service/Fiscal section for EIR impacts and mitigation measures page 4.13-15.

NVA



January 31, 1991

Mr. Randy Mellinger
Planning Director
Town of Mammoth Lakes
Post Office Box 1609
Mammoth Lakes, California 93546

Re: North Village Specific Plan DEIR

Dear Randy:

We have reviewed the Draft Environmental Impact Report for the North Village Specific Plan and have enclosed our formal comments drafted by Meg Sacli of Mountain Environmental Group.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Rusty Gregory".

Rusty Gregory
President
North Village Association

:sd

Enclosure

cc: Meg Sacli - Mountain Environmental Group
North Village Board of Directors

Post Office Box 24
Mammoth Lakes, California 93546
(619) 934-2571

This should be
attached to the
letter from Rusty
Gregory —.

2/4/91 MS

NORTH VILLAGE TRAFFIC STUDY

Assumptions

1. Assume 2,000 total new hotel units for North Village with an occupancy rate of 1.9 persons/unit.¹
2. Assume 400 new condos with an occupancy rate of 4.15 persons/unit.²
3. Assume 75% total people staying at North Village actually ski on a peak weekend.²
4. Assume a distribution of 3:1 for skiers using MMSA vs. those using SSA (ultimate MMSA capacity 24,000 SAOT vs. ultimate SSA capacity of 8,000 saot).
5. Assume 1.07 PAOT at lifts per every 1.0 SAOT.
6. Assume 3.2 persons/auto for skiers driving to lift.
7. Assume drop offs to have 2.2 skiers and 1.0 non-skier per car.
8. Assume non-skiers using commercial have a 2.5 persons/auto occupancy rate.
9. Assume the following type of transportation use in North Village:
 - a. Within a 0.25 mile radius of lift:
 - 75% skiers use lift
 - 11% skiers use buses
 - 11% drive to lift
 - 3% are dropped off
 - b. Outside a 0.25 mile radius of lift:
 - 0% skiers use lift
 - 44% skiers use buses
 - 45% drive to lift
 - 11% are dropped off
10. Assume 75% all North Village visitors are active at peak.
11. Assume peak hour shuttle and tour bus capacity 40 persons/bus.

NVA-1

Calculations

1. Calculate total population staying at North Village.

Hotels/Motels: $2,000 \text{ un.} \times 1.9 \text{ p/un.} \times 100\% \text{ occupancy} = 3,800 \text{ people}$

Condos: $400 \text{ un.} \times 4.15 \text{ p/un.} \times 100\% \text{ occupancy} = 1,660 \text{ people}$

Total people staying at North Village: 5,460

2. Calculate total skiers and ski area distribution.

$5,460 \text{ total people} \times .75 \text{ people actually ski} = 4,095 \text{ skiers staying at North Village.}$

Skier distribution: MMSA:SSA = 3:1

Total NV skiers using MMSA = $4095 \times .75 = 3071 \text{ SAOT}$

Total NV skiers using SSA = $4095 \times .25 = 1024 \text{ SAOT}$

3. Calculate total people (PAOT) at lifts and total NV visitors not at ski areas.

$3,071 \text{ SAOT} \times 1.07 \text{ PAOT/SAOT} = 3,286 \text{ PAOT from NV at MMSA}$

$1,024 \text{ SAOT} \times 1.07 \text{ PAOT/SAOT} = 1096 \text{ PAOT from NV at SSA}$

Total NV people at lifts = 4,382

Total NV people not at lifts = 1,078

4. Calculate traffic generated by NV skiers using MMSA:

- a. Traffic generated by skiers within 0.25 mile radius of gondola (approx. 75% of total NVSP area is within 0.25 mile radius of lift). Skiers within 0.25 miles = $3286 \times 0.75 = 2464$.

On lift: $2,464 \text{ PAOT} \times .75 \text{ lift use rate} = 1,848 \text{ on lift}$

On shuttle bus: $2,464 \text{ PAOT} \times 0.05 \text{ shuttle use rate} = 123 \text{ on shuttle}$

On tour bus: $2,464 \text{ PAOT} \times 0.06 \text{ tour bus use rate} = 148 \text{ on tour bus}$

In cars: $2,464 \text{ PAOT} \times 0.11 \text{ auto use rate} = 271 \text{ in autos}$

Drop off: $2,464 \text{ PAOT} \times 0.03 \text{ drop off rate} = 74 \text{ drop off}$

- b. Traffic generated by skiers beyond 0.25 mile radius of gondola (approximately 25% total NVSP area; therefore approximately 25% total NV population).

Total skiers outside 0.25 mile radius = $3,071 \text{ skiers} \times 0.25 = 768 \text{ skiers}$

Of these, use transportation mode split in assumption 9b, remember, number of skiers must be multiplied by 1.07

PAOT/SAOT at lifts, so total number of people at ski area = $768 \times 1.07 = 822 \text{ PAOT}$

Calculations

1. Calculate total population staying at North Village.

Hotels/Motels: $2,000 \text{ un.} \times 1.9 \text{ p/un.} \times 100\% \text{ occupancy} = 3,800 \text{ people}$

Condos: $400 \text{ un.} \times 4.15 \text{ p/un.} \times 100\% \text{ occupancy} = 1,660 \text{ people}$

Total people staying at North Village: 5,460

2. Calculate total skiers and ski area distribution.

$5,460 \text{ total people} \times .75 \text{ people actually ski} = 4,095 \text{ skiers staying at North Village.}$

Skier distribution: MMSA:SSA = 3:1

Total NV skiers using MMSA = $4095 \times .75 = 3071 \text{ SAOT}$

Total NV skiers using SSA = $4095 \times .25 = 1024 \text{ SAOT}$

3. Calculate total people (PAOT) at lifts and total NV visitors not at ski areas.

$3,071 \text{ SAOT} \times 1.07 \text{ PAOT/SAOT} = 3,286 \text{ PAOT from NV at MMSA}$

$1,024 \text{ SAOT} \times 1.07 \text{ PAOT/SAOT} = 1096 \text{ PAOT from NV at SSA}$

Total NV people at lifts = 4,382

Total NV people not at lifts = 1,078

4. Calculate traffic generated by NV skiers using MMSA:

- a. Traffic generated by skiers within 0.25 mile radius of gondola (approx. 75% of total NVSP area is within 0.25 mile radius of lift).

On lift: $2,464 \text{ PAOT} \times .75 \text{ lift use rate} = 1,848 \text{ on lift}$

On shuttle bus: $2,464 \text{ PAOT} \times 0.05 \text{ shuttle use rate} = 123 \text{ on shuttle}$

On tour bus: $2,464 \text{ PAOT} \times 0.06 \text{ tour bus use rate} = 148 \text{ on tour bus}$

In cars: $2,464 \text{ PAOT} \times 0.11 \text{ auto use rate} = 271 \text{ in autos}$

Drop off: $2,464 \text{ PAOT} \times 0.03 \text{ drop off rate} = 74 \text{ drop off}$

- b. Traffic generated by skiers beyond 0.25 mile radius of gondola (approximately 25% total NVSP area; therefore approximately 25% total NV population).

Total skiers outside 0.25 mile radius = $3,071 \text{ skiers} \times 0.25 = 768 \text{ skiers}$, of these, use transportation mode split in assumption 9, remember, number of skiers must be multiplied by 1.07 PAOT/SAOT at lifts, so total number of people at ski area = $768 \times 1.07 = 822 \text{ PAOT}$

On lift: 0
 On shuttle bus: 822 PAOT x 0.18 shuttle use rate = 148
 On tour bus: 822 PAOT x 0.26 tour bus use rate = 214
 In cars: 822 PAOT x 0.45 auto use rate = 370
 Drop off: 822 PAOT x 0.11 drop off rate = 90

c. Calculate total number of vehicles used by NV skiers using MMSA:

From a) 271 in autos ÷ 3.2 skier/auto = 85 vehicles
 74 dropped off ÷ 2.2 skier/auto = 34 vehicles
 119 vehicles

From b) 370 in auto ÷ 3.2 skier/auto = 116 vehicles
 90 dropped off ÷ 2.2 skier/auto = 41 vehicles
 177 vehicles

Total number of vehicles used by NV skiers using MMSA: 276
 assume 75% on road during peak: 207

5. Calculate traffic generated by NV skiers using SSA:

a. Per Step 2, total NV skiers using SSA = 1,024 SAOT
 Per Step 3, total NV people at SSA = 1024 x 1.07 PAOT/SAOT = 1,096

b. Calculate transportation modes for SSA traffic generated by North Village: use same distribution as used for skiers outside 0.25 mile radius of North Village gondola (see Assumption 9b).

On shuttle bus: 1,096 people at SSA x 0.18 shuttle use rate = 197 people
 On tour bus: 1,096 people at SSA x 0.26 tour bus use rate = 285 people
 In cars: 1,096 people at SSA x 0.45 auto use rate = 493 people
 Drop off: 1,096 people at SSA x 0.11 drop off rate = 121 people

c. Calculate total number of vehicles used by NV skiers at SSA:

From b) 493 in autos ÷ 3.2 skier/auto = 154 vehicles
 121 dropped off ÷ 2.2 skier/auto = 55 vehicles
 209

Total number of vehicles used by NV skiers using SSA: 209

Assume 75% on road during peak: 157 vehicles

6. Calculate total number of vehicles used by skiers from NV: [i.e., total x 75% on road during peak]

From #4: Total peak vehicles using MMSA 207
 From #5: Total peak vehicles using SSA 157
 364

364 = total ski related vehicles generated by NV patrons

7. Calculate non-ski related traffic generated by NV patrons:

From #3: Total NV people not at lifts = 1,078
 (assume drop off drivers are accounted for in 1.07 figure)
 so, 1,078 people elsewhere in Town:

Assume 75% of all non-skiers are out at commercial facilities during peak: $1,078 \times .75 = 810$ people

Of these assume, 50% are using pedestrian oriented facilities in NV and are not driving: $810 \times 0.5 = 405$ are walking; and 405 are in cars.

Assume 2.5p/vehicle occupancy rate per non-ski vehicle: $405 \div 2.5$ p/vehicle = 162 vehicles in Town.

8. Calculate the number of non-North Village visitors using North Village commercial during peak:

Transtech Formula: PM Peak Hour Trips
 $\ln(T) = 0.52 \times \ln(A) + 4.04$

Where \ln = Natural Logarithm
 T = Two-way volume of traffic (total trip-ends)
 A = Area in 1,000 gross sq. ft. of leasable area

For Plaza: [60,000 square feet commercial]

$\ln(T) = 0.52 \times \ln(60) + 4.04$
 $\ln(T) = 0.52 \times (4.09) + 4.04$
 $\ln(T) = 6.17$
 $T = 478$

For supporting commercial: use Transtech Figure of 167,000 square feet of supporting resort commercial.

$\ln(T) = 0.52 \times \ln(167) + 4.04$
 $\ln(T) = 0.52 \times (5.12) + 4.04$
 $\ln(T) = 6.7$
 $T = 814$

Total trips generated by outside users of NV commercial: 1,292

9. Revise calculations in #8 to reflect North Village Development and visitor patterns:

Assume a 50% reduction in trips off the top due to the following:

- a. People will park cars and walk to several different commercial facilities.
- b. People will patronize NV commercial on trips enroute from somewhere else (i.e., trips will not originate or end at North Village).
- c. People who are interested solely in patronizing NV commercial will consciously select against travelling to North Village during peak.

so; $1,292 \text{ trips} \times 50\% = 646 \text{ trips}$

- d. This figure should be further reduced by the fact that some patrons of North Village commercial will be the non-skier North Village visitors. From #7, 405 people staying in North Village are walking and using North Village commercial during peak traffic hour.
- e. In order to determine how much to reduce NV commercial traffic, assume the following:

In a worst case scenario, the 646 trips are all one way trips; i.e., each trip represents a separate vehicle. Also, each vehicle transports an average of 2.5 shoppers.

Therefore, peak traffic hour population (after above deductions) at NV commercial is $646 \text{ vehicles} \times 2.5 \text{ per/vehicle} = 1,615 \text{ people}$.

Per #7, 405 people originate within NV and are walking, so total people driving to NV = $1,615 - 405 = 1210$ outside people

If we use 2.5 people/vehicle, we get 1,210 outside people - $2.5 \text{ p/car} = 484$ vehicles generated by non-NV visitors using NV commercial during peak.

10. Calculate Total peak traffic related to NVSP:

From #6: 364 ski related trips by NV visitors
From #7: 162 trips by NV visitors to outside commercial
From #9: 484 trips to NV commercial from outside visitors
1010 vehicle trips generated at peak traffic hour by NV, assuming 75% of NV population is on the road

We get 60% what Transtech Study says.

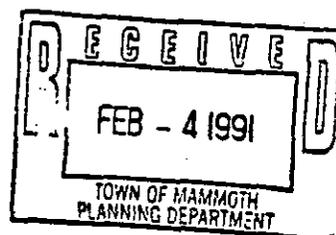
NVA-1 See Response to Comment SOC-70(a) & (b).

STATE OF CALIFORNIA—OFFICE OF THE GOVERNOR

OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814

Jan 31, 1991

BILL TAYLOR
TOWN OF MAMMOTH LAKES
437 OLD MAMMOTH ROAD, STE. R
MAMMOTH LAKES, CA 93546Subject: NORTH VILLAGE SPECIFIC PLAN
SCH # 89040321

Dear BILL TAYLOR:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact John Vanderbilt at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp
Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

OPR-1

Notice of Completion

Appendix F

SCH # **89040321**

Mail to: State Clearinghouse, 1400 Tech Street, Sacramento, CA 95814 916/445-0813

Project Title: North Village Specific Plan
 Lead Agency: Town of Mammoth Lakes Contact Person: Bill Taylor
 Street Address: 437 Old Mammoth Road, Ste. K Phone: (619) 934-8983
 City: Mammoth Lakes Zip: 93546 County: Mono

Project Location:
 County: Mono City/Municipal Community: Mammoth Lakes
 Case Street: Main, Mineret, and Lake Mary Roads Total Acres: 64.1
 Assessor's Parcel No.: _____ Section: 38 Twp: 3 SOUTH Range: 27 east Bsm: _____
 Within 2 Miles: San Mary R. Waterways: _____
Airports Railroads Subways

Development Type
 CEQA: MOP Supplemental/Amendment NEPA: NOI Other: Joint Document
 EIR (Prior SCH No. L _____) EA Final Document
 Neg Dec Other _____ Draft EIR Other _____
 Draft EIR FONSI

Local Action Type
 General Plan Update Specific Plan Rules Amendment
 General Plan Amendment Master Plan Provisions Subdivision
 General Plan Element Planned Use Development Use Permit General Permit
 Conceptual Plan Site Plan Local Ordinance (Ordinances, Other _____
 Permit Maps, Tract Maps, etc.)

Development Type
 Residential: Units 2,400 Acres _____ Water Pollution Type _____
 Office: Sq. Ft. _____ Acres _____ Employees _____ Transportation Type _____
 Commercial: Sq. Ft. 60,000 Acres _____ Employees _____ Mining: _____ Power Type _____
 Industrial: Sq. Ft. _____ Acres _____ Employees _____ Water Treatment Type _____
 Educational _____ Hazardous Waste Type _____
 Recreational: SKATING RINK, SKI LIFT Other _____



Project Issues Discussed in Document
 Aesthetics/Visual Flood Plain/Flooding Schools/Ungrading Water Quality
 Agricultural Land Forest Land/Fire Hazard Soils/Erosion Water Supply/Contaminants
 Air Quality Geology/Seismic Land Capacity Wetlands/Regrowth
 Archeological/Historic Minerals Soil Erosion/Compaction/Grading Wetlands
 Cultural Resources Noise Solid Waste Groundwater
 Drainage/Alteration Population/Housing Balance Toxic/Hazardous Landuse
 Environmental Goals Public Services/Facilities Traffic/Congestion Cumulative Effects
 Flood Recreation/Parks Vegetation Other: Utilities

Present Land Use/Zoning/General Plan Use: The majority of the parcels within the project site are currently zoned as Commercial with the peripheral acreages zoned as Residential - more flexible site designs would be allowed.

Project Description
 Focusing on creating visitor services and attractions, while emphasizing pedestrian access and mobility, the proposed project, 61 separate parcels - approx. 64.1 acres, includes 2,000 new hotel/motel lodging units, 400 new condominium units, and units for employee housing are planned for construction. Parcels developed for non-lodging purposes will be oriented toward visitor commercial uses.

CLEARINGHOUSE CONTACT: 916/445-0813
 JOHN J. VANDERBILT, JR.
 STATE REVIEW BEGAN: 12-17-90
 DEPT REV TO AGENCY: 1-24
 AGENCY REV TO SCH: 1-29
 SCH COMPLIANCE: 1-31
 PLEASE RETURN VOC WITH ALL COMMENTS
 AWD/APCD: 9 (Resources: 12/22)

A. J. ZELMAN
 IGR/CEQA COORDINATOR

89040321
 Resources Agency
 Conservation
 Fish & Game
 Forestry
 Parks & Rec/OSD
 CHP
 Caltrans
 RMC
 State Lands Com

OPR-1

Comment noted.

ORR

Owens River Ranch

At The Headwaters Of The Owens River

Route 1, Box 232
Mammoth Lakes, Calif. 93546

February 4, 1991

Randy Wellinger
Planning Director
Town of Mammoth Lakes
P. O. Box 1609
Mammoth Lakes, CA 93546

Dear Randy:

This letter will serve as my comments on the DEIR for the North Village Specific Plan. My concerns lie in the potential impacts of additional water usage in the Mammoth Lakes area on the upper Owens River watershed.

In early January, I stopped by your office and provided you with copies of my letter to the USFS regarding potential impacts on Big Springs by groundwater extraction in the Dry Creek area. I also gave you a copy of Mono County's comments on the Dry Creek well project which express the same concerns.

Simply stated, contemplation of a project of the magnitude of North Village, without a proven, environmentally benign and fully mitigated water source is irresponsible.

ORR-1

Thank you for the opportunity to comment.

Sincerely,



Tim Albers
Managing General Partner

TA/

ORR-1

It is beyond the scope of the report to discuss all the possible impacts associated with future water sources (i.e. Dry Creek wells) as these sources are not needed to supply North Village alone, but supplying the cumulative needs of the General Plan build-out. Environmental documentation discussing specific impacts of each project will have to be performed. Well #11 and the Dry Creek Wells are currently under environmental review.

RUDDER, LIEBERSBACH & MOHUN

PAUL S. RUDDER
 RICHARD W. LIEBERSBACH
 GERALD F. MOHUN, JR.
 R. MARK CARNEY

ATTORNEYS AT LAW
 SHERWIN PROFESSIONAL PLAZA
 OLD MAMMOTH ROAD
 MAMMOTH LAKES, CALIFORNIA 93546

MAILING ADDRESS
 P. O. BOX 2127
 MAMMOTH LAKES, CA 93546
 (619) 934-4558
 FAX (619) 934-2530

February 4, 1991

Mr. Randy Mellinger
 Planning Director
 Town of Mammoth Lakes
 Post Office Box 1609
 Mammoth Lakes, California 93546

Hand Delivered

*Re: Comments to Draft Environmental Impact Report for North
 Village Specific Plan, December 1990*

Dear Randy:

As you already know, our offices represent various associations within the Slopes area who are concerned and opposed to the proposed closure of Canyon Boulevard and the redesignation of Lakeview Boulevard as an arterial road. The condominium projects that we represent include Canyon Ski & Racquet Club, Mountainback Condominiums, Mammoth Ski & Racquet Club, and Mammoth West. Our clients support the concept and development of North Village and their opposition and concerns are limited strictly to the closure of Canyon Boulevard and the redesignation of Lakeview Boulevard as an arterial. As you will see from our comments, the North Village Specific Plan could be modified to accommodate our clients' concerns and reduce the traffic impact to the many owners and condominium associations within the Slopes area.

We have included below comments to the draft Environmental Impact Report on a page by page basis and then have set forth after that analysis additional comments that have been raised during the information gathering stage but which, for some reason, have not been included in the draft Environmental Impact Report. For further clarification and information, I have attached herewith and incorporate herein copies of various letters from our clients setting forth their comments during the information gathering stage we would like to make a part of the record of this draft Environmental Impact Report. Because of the overlap of various EIR sections and our related concerns, there is some duplication in our comments.

1. Page 1-12, Section 4.4-1.

Our clients support the concept of the gondola and believe that it will significantly reduce the traffic impact in the Slopes area as a result of development of the North Village Mr.

RLM-1

Randy Mellinger
February 4, 1991
Page Two

project. If the gondola is not approved then the impact of the closure of Canyon Boulevard will be severely exasperated and cause even more significant traffic problems than will be created if Canyon Boulevard is closed and the gondola installed. In addition, the gondola is certainly capable of reducing the traffic impact as a result of additional skiers reaching the Mountain. However, it does not reduce or mitigate the impact on traffic flow in case of an emergency, such as a fire or other disaster, and does not mitigate the impact of the closure of Canyon Boulevard during any other type of disaster where evacuation in the Slopes area would be necessary. The impact on traffic should be analyzed to determine what would happen if Canyon Boulevard were closed and Lakeview Boulevard redesignated, but the gondola not approved. Mitigation measures should be provided accordingly. An analysis of emergency traffic flow and evacuation needs as a result of a disaster or emergency should also be done and mitigation measures added accordingly.

RLM-2

2. Page 1-15, Section 4.4-10.

The statement says that the North Village Specific Plan would be consistent with the Town of Mammoth Lakes General Plan. That statement is not true and needs to be amended to provide that the proposed North Village Specific Plan is not consistent with the Town of Mammoth Lakes General Plan. The transportation circulation element of the General Plan of the Town of Mammoth Lakes as adopted on October 14, 1987, provides that Canyon Boulevard and Lakeview Boulevard both be collector roads and that Hillside Drive and Lakeview Road not be collector roads. In addition, the noise element of the General Plan provides that the maximum decibel level for single family residential not exceed 60dB and that multiple family residential areas not exceed of level of 65dB. The North Village Specific Plan provides for the closure of Canyon Boulevard eliminating a section as a collector street, provides for the redesignation of a portion of Hillside Drive as a collector road, and provides for the redesignation of Lakeview Boulevard as an arterial. These are all inconsistent with the General Plan and pursuant to Government Code Section 65454 the specific plan may not be adopted unless the specific plan is brought into consistency with the general plan. In addition, the redesignation of Lakeview Boulevard as an arterial will create a noise impact in that residential area which would very likely exceed the maximum decibel level permitted for residential and multiple family residential area. Again, the North Village Specific Plan transportation circulation system is not consistent with the General Plan for the Town of Mammoth Lakes and this statement should be amended accordingly.

RLM-3

RLM-4

RLM-5

Mr. Randy Mellinger
February 4, 1991
Page Three

3. Page 1.44, Section 4.13-3.

No statement is included regarding the impact of the proposed closure of Canyon Boulevard on the level of police services to the other residents within the Slopes area. This is particularly significant if Canyon Boulevard is closed leaving only two alternative access routes. The elimination of one of the three major access routes into the Slopes area is not discussed insofar as delivery of police services, fire services, etc., and should be addressed and mitigated to a level of non-significance. Mitigation alternatives should include maintaining Canyon Boulevard through to Minaret.

RLM-6

4. Page 1.45, Section 4.13-4.

Again, the closure of Canyon Boulevard relative to its impact on the delivery of fire protection services to the remaining residents in the Slopes area, particularly at times of severe snow storms or the closure of one or more of the access routes, would be significant, should be analyzed, and should be mitigated to a level of non-significance. One of the mitigation measures we propose is to maintain Canyon Boulevard. I personally used to live in the Slopes area and when my wife was in labor with our second baby, we had to exit the Slopes area Thanksgiving weekend at midnight during a severe snow storm. Two of the exits were totally blocked as a result of accidents and severe traffic. Had it not been for the third exit, we would not have been able to leave the Slopes area and get to the hospital in time for my wife to have a baby in the safe environment of the hospital. The closure of Canyon Boulevard will have a very significant effect on the delivery of emergency services to the remaining residents in the Slopes and will effect their ability to evacuate during an emergency. This impact and the mitigation measures have not been included in the summary section and should be summarized there.

RLM-7

5. Page 2-7, Figure 2.4-1.

This lays out the Specific Plan analyzed in the draft Environmental Impact Report and the Specific Plan. However, it is our understanding that there may be some modifications currently proposed to this plan and, if so, our comments contained within this letter would be equally applicable to any revised plan with the same or similar circulation plan. This plan designates an access road known as Spring Lane which, if modified slightly, could be utilized and widened for the purpose of maintaining Canyon as a thoroughfare from the intersection of Hillside Drive to Minaret. This mitigation measure has not been analyzed and should be analyzed as part of the traffic and circulation analysis.

RLM-8

Mr. Randy Mellinger
February 4, 1991
Page Four

6. Page 4.1-18, Section 29.

This section accentuates the General Plan elements which are inconsistent with the North Village Specific Plan. In particular, the closure of Canyon Boulevard will prevent adequate emergency access to evacuate peak populations during emergencies. The installation of the gondola will alleviate and reduce the impact of additional skiers as a result of the North Village development but will not aide the evacuation of existing populations who purchased their homes and/or condos many years ago and depended on Canyon Boulevard, Forest Trail and Lakeview Boulevard as evacuation access routes. The other item is the "completion of the existing roadway system" as a means of emergency access is again inconsistent with the North Village Specific Plan because the North Village Specific Plan intends to prevent the completion of the existing roadway system. This inconsistency should be noted and an analysis done of how emergency access to evacuate peak populations during emergency periods can be accomplished when one-third of all of the collector access routes for such evacuation is eliminated. Mitigation should be suggested to bring this type of significant impact to a level of non-significance and the Specific Plan needs to be amended to conform to the General Plan.

RLM-9

The North Village Specific Plan is also inconsistent with the seismic safety element of the General Plan because it does not insure adequate emergency access to evacuate peak populations during emergencies by designating additional emergency access road alignments nor does it promote the completion of the existing roadway system.

RLM-10

7. Page 4.4-3, General Plan Policies.

As set forth above, the North Village Specific Plan is inconsistent with the traffic and circulation element of the General Plan, the noise element, and the seismic safety element. The draft EIR does provide "its main constraint within the General Plan is its road and major circulation problems". However, it should go on to state the inconsistencies with the General Plan as set forth above and address how the Specific Plan must be revised to bring it into conformity with the General Plan. Mitigation to a level of non-significance will not fulfill the requirements of Government Code Section 65454 providing that the Specific Plan must be consistent with the General Plan. As a result, a statement should be included in this draft EIR that Canyon Boulevard not be closed, that Hillside Drive not be redesignated as a collector street, and that Lakeview Boulevard not be redesignated as an arterial because all of these are inconsistent with the Mammoth Lakes General Plan.

RLM-11

Mr. Randy Mellinger
February 4, 1991
Page Five

8. Page 4.4-5, Section 8.

This section does not adequately address the problems referenced above with regards to the inconsistencies with the General Plan and the appropriate statements need to be included in this Environmental Impact Report regarding changes to the Specific Plan to bring it into conformity with the General Plan. Please see the paragraphs above.

RLM-12

9. Page 4.4-14, Section 4.4-10.

The draft Environmental Impact Report states that the North Village Specific Plan would be consistent with the Town of Mammoth Lakes General Plan. This statement simply is not true and needs to be amended in accordance with our statements set forth above.

RLM-13

10. Page 4.7-1, Section 4.7.

The draft Environmental Impact Report fails to state that the proposed circulation plan for the North Village Specific Plan is inconsistent with the Mammoth Lakes General Plan for the reasons set forth above. Included in this inconsistency is the inconsistency relative to the closure of Canyon Boulevard, the redesignation of Lakeview Boulevard as an arterial, the redesignation of Hillside Drive and Lakeview Road as collectors, the elimination of the left turn lanes at the intersection of Canyon and Minaret, the inconsistency with regards to the seismic safety element because of the reduction in the access routes, the inconsistency with regards to the noise element because of the increased traffic on Lakeview as a result of its redesignation as an arterial, etc.

RLM-14

11. Page 4.7-14, Table 4.7.2.

This table analyzes existing p.m. peak hour level at the intersection of Minaret Road and Canyon Boulevard under the existing condition of an unsignalized intersection. However, no analysis is done to determine the level of service description and the reserve capacity of this intersection with a signalized intersection. The statement on Page 4.7-38, at the bottom paragraph to the effect that three signalized intersections along Minaret Road would be "undesirable from a traffic operation standpoint" does not adequately address the impact of the closure of Canyon Boulevard in lieu of putting a signalized intersection there. No analysis is done insofar as synchronizing the three signals in question and comparing the capacity and the traffic flow assuming three signalized intersections with the traffic flow under the North Village Specific Plan. Further, there is no comparative analysis between the three signalized intersection arrangement and the North Village Specific Plan two signalized intersection arrangement insofar as evacuating large numbers of people out of

RLM-15

RLM-16

Mr. Randy Mellinger
February 4, 1991
Page Six

the Slopes area in the event of a disaster, providing access to emergency vehicles into the Slopes area in the event of an emergency, and analyzing the impact on Lakeview Boulevard insofar as traffic, noise, etc. A detailed study should be conducted to compare traffic flows and other impacts including emergency access between a signalized intersection at Canyon Boulevard and the North Village proposal. The technical analysis in the Appendices states that a signal at Canyon and Minaret would provide acceptable levels of traffic at the Canyon/Minaret intersection. This statement should be included in the body of the EIR, together with the back-up data.

RLM-17

12. Page 4.7-30, Section ?.

This page was missing from our draft Environmental Impact Report and may be missing in other copies as well.

RLM-18

13. Page 4.9-3, Section "Town of Mammoth Lakes Noise Environment".

Since a redesignation of Lakeview Boulevard will most certainly increase the noise level on this residential street to a level in excess of 60dB and more likely also exceed 65dB, then the North Village Specific Plan recommendation for redesignating Lakeview Boulevard would be inconsistent with the Mammoth Lakes General Plan Noise Element. As a result, a study should be conducted of the impact of the closure of Canyon Boulevard and redesignation of Lakeview Boulevard vis-a-vis the noise impact it will have along Lakeview Boulevard. In the event that the study shows that such increase in noise levels from the redesignation cannot be adequately mitigated, then the North Village Specific Plan circulation element is inconsistent with the Town General Plan and cannot be approved. In the draft Environmental Impact Report there should be a detailed study analyzing this noise impact.

RLM-19

14. Page 4.9-6, Table 4.9.3.

There should be included in this Table an analysis of increased noise along Lakeview Boulevard as a result of the redesignation of this road as an arterial. Also an analysis of the noise level increase for the Hillside/Canyon intersection and Hillside/Forest Trail intersections both under existing conditions and under the cumulative impact study assuming the traffic circulation element of North Village was to be instituted. The analysis for Lakeview Road should include calculations of the distance currently existing between the road and the residential housing together with the road and the distance to the multiple family residential housing already built along that road. It is particularly notable that the predicted noise levels from Table 4.9.3. were calculated for 50 feet from the center of the road and in virtually each of these calculations, the dB levels exceeded the

Mr. Randy Mellinger
February 4, 1991
Page Seven

General Plan Noise Element Designation of 60dB for single family residential and 65dB for multiple family residential. If the noise analysis of Lakeview Boulevard shows an impact in excess of the designation of the General Plan and mitigation that cannot reduce said dB levels below those in the General Plan, then the North Village Specific Plan Circulation Element as proposed cannot be approved because it is inconsistent with the Town of Mammoth Lakes General Plan.

RLM-20

15. Page 4.9-9, Section 4.9.2 (c).

The transit alternatives recommendation for mitigation should be expanded and instead of extensive road widenings and redesignation of Lakeview Boulevard as an arterial, a comprehensive bus system should be more heavily encouraged as a mitigation element. In addition, we believe that another mitigation element to reduce the impact of noise would be to maintain Canyon Boulevard as a collector road with a signalized intersection, not redesignate Lakeview Boulevard as an arterial, and thereby spread out the traffic from the Warming Hut II and Slopes area more evenly throughout the three collector roads thereby reducing the severity of the noise impact and maintaining the consistency with the General Plan.

RLM-21

RLM-22

16. Page 4.13-4, Section 4.13-4.

The impact on fire protection from the closing of Canyon Boulevard, needs to be dramatically expanded insofar as problems in the surrounding areas. Closing Canyon will have implications for fire protection far beyond the North Village boundaries. There are thousands of homes and condominiums in the Slopes area with only three existing access routes, any one or two of which are frequently closed in severe snow storm weather. The elimination of any one of these three could have a dramatic and life-threatening effect to the people and residences located in the existing homes and condominiums in the Slopes area. In particular, the closure of Canyon Boulevard will eliminate one-third of all the current existing major access routes and could easily prevent or severely inhibit and delay a response time by fire or ambulance service into the existing condominium properties. An analysis and study needs to be completed to determine what impact this will have on these properties.

RLM-23

RLM-24

In the event of a seismic safety problem, forest fire, or some other disaster which would require quick evacuation of large numbers of people from that area, the elimination of one-third of all the access routes leaving only two for all of the thousands of people who would attempt to evacuate would be a life threatening disaster which is not adequately addressed in this draft Environmental Impact Report. A detailed study needs to be completed and mitigation measures need to be in place to insure

RLM-25

Mr. Randy Mellinger
February 4, 1991
Page Eight

that the Slopes area will be adequately served with access routes to provide emergency vehicle access as well as evacuation routes. In the event an elimination of one-third of all of the access routes is recommended, then we believe a statement of overriding concern is necessary in order to establish why this impact cannot be mitigated. In addition, an amendment to the General Plan will be necessary in order to bring the Specific Plan into consistency with the seismic safety element of the General Plan before it can be approved.

RLM-26

17. Page 5.1, Section "CUMULATIVE IMPACTS".

The statements in this section need to be corrected because the North Village Specific Plan is not consistent with the General Plan of the Town of Mammoth Lakes and this inconsistency needs to be identified in the draft Environmental Impact Report. The discussion of this inconsistency is set forth above. The noise element inconsistency relative to the redesignation of Lakeview Boulevard as an arterial instead of a collector, is not a cumulative impacts study inconsistency but rather an inconsistency with the noise element as a result of the redesignation itself. The cumulative impact of the development of North Village to the noise levels within the Town in general is a cumulative impacts analysis with which our clients do not disagree. However, there are specific impacts as a result of the North Village Specific Plan Circulation Element which will create and aggravate noise levels above the normal and typical cumulative impact. This specifically includes the redesignation of Lakeview Boulevard as an arterial.

RLM-27

18. Appendices, Page 15, Section 2.3. Bottom Paragraph.

This section contains a statement "Traffic signals at these two locations would improve conditions to acceptable levels", referring to the possible installation of a signal at the intersection of Canyon Boulevard and Minaret Road. This is an excellent comment of the possible mitigation measure of keeping Canyon Boulevard open and installing a signal. Further, it reflects actual studies done and conclusions drawn to the effect that a proper mitigation measure should be insuring that Canyon Boulevard remain open and a signal be installed there, all in accordance with the plans of the General Plan. As stated earlier, studies need to be completed to show to the decision makers the quantitative as well as qualitative analysis of keeping Canyon Boulevard open and placing a signal at that intersection as a more appropriate mitigation measure rather than making the summary statements about traffic flows referenced elsewhere in this letter. There is no data to backup the conclusory statements made elsewhere to the effect that synchronized signals with the three intersections would in any way inhibit traffic flow down Minaret Road, particularly in

RLM-28

RLM-29

Mr. Randy Mellinger
February 4, 1991
Page Nine

light of other possible mitigation measures such as a through lane, right hand turn signals, etc.

19. Appendices, Page 19, Section 3.1.

While the two improvements listed in this section are "programmed" for implementation by the Town of Mammoth Lakes, all other improvements in the circulation element of the General Plan are also "programmed". Clarification of the term "program" should be included to differentiate improvements that are planned by the Town of Mammoth Lakes in the General Plan and improvements which are currently being planned for funding within the next budget period by the Town of Mammoth Lakes. The way this section is written, the reader is left to believe these are the only improvements intended to be completed in the near future, but there are also other road improvements planned for completion and set forth in the Town of Mammoth Lakes General Plan. As a result, we recommend clarification or inclusion in this section of a statement to the effect that Canyon Boulevard/Minaret Road intersection is planned to be improved, and that the circulation element of the General Plan is intended to be completed.

RLM-30

20. Appendices, Page 23, Table 3.

This chart is an excellent chart showing skiers at one time projected at total build-out by the Mammoth Mountain Ski Area Expansion Plan. However, in the event any of these improvements are not completed, some statement should be included in this draft Environmental Impact Report to indicate the tremendous increase in skiers at one time in the Warming Hut II area because these figures are based on the assumption that other improvements will be completed thereby reducing the flow of skiers at the Warming Hut II area. Our clients are very supportive of the efforts of the Mammoth Mountain Ski Area in reducing its skier at one time figures at the Warming Hut II area by the expansion of facilities in other areas. However, there is no discussion in the draft Environmental Impact Report about the short-term "in the next five to ten years" impact that the tremendous expansion at North Village, together with a possible closure of Canyon Boulevard, would have in the Warming Hut II area and how that traffic flow can possibly be accommodated if in fact Canyon Boulevard is closed. In other words, all of these improvements cannot be completed at one time and there is no discussion in the draft Environmental Impact Report about how the short-term impacts will be mitigated while the ski area expands elsewhere and distributes the skier population more evenly around the Mountain. This will have a tremendous impact on the residents along Lakeview Boulevard and must be mitigated to a level of non-significance.

RLM-31

RLM-32

Mr. Randy Mellinger
February 4, 1991
Page Ten

21. Appendices Page 41, Table 10.

We recommend that the intersection of Canyon Boulevard and Minaret Road be included in some type of study such as this to determine what the capacity would be if it were signalized and at what level of service it would operate. The statement made previously in these Appendices indicates that signalized intersection at Canyon and Minaret would operate at acceptable levels and should be included in a table such as this for comparative purposes in determining the appropriate mitigation measure.

RLM-33

22. Appendices Page 42, Section 6.0.

This section states that mitigation developed for the most part conforms to roadway designation goals and policies contained in the circulation element of the Mammoth Lakes General Plan. That statement is not true because in fact it makes dramatic changes to the circulation element. No where does the draft Environmental Impact Report or the technical appendices discuss how Lakeview Boulevard could accommodate a design criteria of 40 mile per hour traffic. Would Lakeview have to be widened and if so, where will the land come from in order to widen Lakeview Boulevard? How will a 40 mile per hour road impact a single family residential area such as Lakeview? How will personal driveways onto an arterial impact flow down a steep hill at 40 miles per hour? These need to be analyzed.

RLM-34

RLM-35

RLM-36

23. Appendices, Page 46, Section 6.4.

The signalized intersection of Minaret Road/Forest Trail as improved with the mitigation measures will operate at LOS "D" and therefore, in order to improve that LOS level, Canyon Boulevard as a mitigation measure should be maintained and signalized instead of closed. This will help spread the traffic and minimize the load on Forest Trail.

RLM-37

24. Appendices, Pages 52 and 53, Section 7.1 and Section 7.2.

While goal one of the circulation plan indicates that they wish to "reduce the level of skier traffic passing through predominately residential areas" and to maintain circulation for emergency vehicles, the actual impact of the plan as described in Section 7.2 on Page 53 indicates that there will be higher levels of traffic on the roads, particularly implying that there will be higher levels of traffic along Lakeview Boulevard - a residential road. The impact of the plan is very inconsistent with the goal of the plan and as a result, mitigation should be included to maintain Canyon Boulevard and not redesignate Lakeview. How the specific plan accomplishes its goals should be discussed and in particular there should be a discussion of how the plan actually does reduce the level of skier traffic passing through

RLM-38

Mellinger
February 4, 1991
Page Eleven

predominately residential areas when Lakeview will be increased as an arterial. How emergency service access will be improved while eliminating one of the access routes needs to be explained. The statement at the bottom paragraph on Page 53 also refers to the intersection of Canyon Boulevard and Minaret Road without a signal as being a liability from a safety standpoint and that three signalized intersections in such close proximity as Main Street, Canyon, and Forest Trail would be undesirable. Unfortunately, no data backs up these conclusory statements and adequate studies should be done to determine the impact of possible mitigation of keeping Canyon Boulevard open with a signal in lieu of closing it. In other words, there is not sufficient data to determine that the conclusory statements at the top of Page 54 are in fact true or accurate and it would appear that as set forth in other parts of this letter, a signalized intersection at Canyon Boulevard would be an appropriate mitigation.

RLM-39

RLM-40

25. Appendices, Page 55, Section 7.2.

A statement is made to the effect that typically low speed maneuvers to and from parking areas would be provided from lower volume collector streets as a result of the proposed Specific Plan. This statement simply is not true with regards to the impact of redesignating Lakeview Boulevard as an arterial. The statement should be amended to clarify and state that this may occur within the project area itself but the number of low speed maneuvers to and from private residential driveways and condominium driveways directly onto arterials will be dramatically increased as a result of the redesignation of Lakeview Boulevard. Mitigation of this impact should be included to reduce the impact to a level of non-significance.

RLM-41

RLM-42

26. Appendices, Page 56, Figure 11.

This diagram indicates that a shuttle system will be able to travel up and down Spring Lane which, if retained in the North Village Specific Plan, could be utilized to insure that Canyon Boulevard remain open and simply re-route Canyon Boulevard down what is now called Spring Lane.

RLM-43

In addition to the page by page comments set forth above, we would like to provide the following comments and recommendations:

1. Canyon Boulevard should not be closed and instead Canyon Boulevard/Minaret Road intersection should be improved and a traffic signal should be installed at that location consistent with the Mammoth Lakes General Plan. The signal should be synchronized with the other signals to insure consistent and constant movement of traffic through that area.

RLM-44

Mr. Randy Mellinger
February 4, 1991
Page Twelve

2. Lakeview Boulevard should not be designated as an arterial particularly because of its impact on the surrounding residential area, the inability to widen Lakeview Boulevard to four lanes, and maintenance as one of three access routes into the area.

RLM-45

3. All signals and signs (both electronic and other signage) guiding visitors to the areas should direct traffic equally for use of Canyon Boulevard and Lakeview in order to minimize the impact on Lakeview and to insure equal traffic flow along each of the three routes (Canyon, Forest Trail and Lakeview). A parking analysis for the Lakeview Boulevard area should be done to determine whether parking restrictions should be instituted along that road, thereby forcing people to use the shuttle system and the parking facilities to be provided in the North Village area.

RLM-46

4. The traffic study and analysis in the draft Environmental Impact Report and the North Village Specific Plan states that the total traffic flow as a result of the development of North Village up into the Warming Hut II area will be decreased as a result of the development of North Village - specifically the use of the gondola. However, adequate parking needs to be provided in the North Village area to insure that there is a reduction in the number of vehicles travelling to that area from that which exists now. In other words, if Canyon Boulevard is closed, then North Village needs to be able to provide not only for its own parking needs but also to provide for parking that is currently being used in the Warming Hut II and Lakeview Boulevard areas in order to reduce the total current traffic flow into that area. The specific plan for North Village does not currently provide for that much parking.

RLM-47

5. The traffic section of the North Village Specific Plan calls for general paving of the Mammoth Lakes area with major freeway routes which will increase to everyone's detriment the use of car traffic throughout the Town. The traffic mitigation sections should be amended to encourage and mandate the use of a bus system in lieu of the many street widenings that are proposed. Regardless of the bus implementation measures, and regardless of whether Canyon Boulevard remains open, Lake Mary Road/Lakeview Road improvements as proposed in the North Village Specific Plan and as described in the draft Environmental Impact Report need to be completed as one of the mitigation measures. Lake Mary Road should not be widened for use of four lanes of through traffic because to do so would improperly encourage too much traffic along Lake Mary Road and ultimately along Lakeview Boulevard. Instead, two lanes of through traffic with the appropriate left turn and right turn lanes should be utilized as discussed in the documents, that intersection should be raised to eliminate the severe grade that

Mr. Randy Mellinger
February 4, 1991
Page Thirteen

exists now, and a traffic signal should ultimately be installed. In the event Canyon Boulevard is in fact approved for closure, then before the closure could take place, the road improvements need to be completed. If Canyon Boulevard is closed, it will have a dramatic and immediate impact on the traffic circulation and the improvements projected for Lake Mary Road will effectively shut off that access route until they are completed. As a result, if Canyon were closed and Lake Mary Road were not yet completed, then the only access in and out of the Slopes would be Forest Trail, which would create an extremely dangerous and extremely hazardous condition. Instead, if Canyon Boulevard is closed then Canyon and Forest Trail should be used as access routes while the improvements along Lake Mary Road are completed. Only when those Lake Mary Road improvements are actually completed could the Canyon Boulevard closure take place or else there would be extreme and dangerous consequences.

RLM-48

6. Parking should be restricted on Lakeview Boulevard consistent with Canyon Boulevard - either (A) no parking at all (present Canyon restriction), or (B) limited parking by permits. This would enhance traffic flow and improve safety along Lakeview Boulevard.

RLM-49

7. There should be no widening, now or in the future, of Lakeview Boulevard.

RLM-50

8. Mitigation should include construction of a major parking facility at the southwest corner of Lake Mary Road/Minaret Road/Main Street, and another facility in the North Village area for the day use skiers and others visiting North Village in the event Canyon is closed and Lakeview redesignated. In connection with these parking facilities, parking should be limited at Warming Hut II to encourage use of the North Village parking facilities and reduce traffic to Warming Hut II. Most all other pedestrian oriented developments provide nearby parking access (i.e., the center of Vail, resort attraction areas, shopping malls, etc.).

RLM-51

9. Binding agreements covering all aspects of transit services should be in place concurrently with project approvals. This is in addition to completion of Lake Mary Road improvements prior to any closure of Canyon, if in fact the Town Council approves the closure of Canyon.

RLM-52

In addition to the comments set forth in this letter, we have attached hereto copies of various correspondence submitted to and from the Town and/or the project proponent over the last several months which we wish to incorporate and make a part of our comments. As you will note, some of the correspondence touches

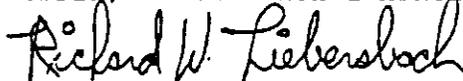
Mr. Randy Mellinger
February 4, 1991
Page Fourteen

upon subjects already discussed in this letter, some supplement these comments, and some address separate issues.

Thank you very much for the opportunity to comment on the draft Environmental Impact Report. I will look forward to responses in the final Environmental Impact Report to all of our concerns set forth herein. If you have any questions, please do not hesitate to contact us. We have previously discussed with the project proponents our concerns over the closure of Canyon Boulevard and redesignation of Lakeview Boulevard as an arterial and I believe the project proponents are already familiar with our position. Once again, thank you for your help and cooperation.

Very truly yours,

RUDDER, LIEBERSBACH & MOHUN



RICHARD W. LIEBERSBACH

RWL:gc

Enclosures: As noted

cc: Canyon Ski & Racquet Club
Mountainback Condominiums
Mammoth Ski & Racquet Club
Mammoth West
Mr. Rusty Gregory
Center for Settlement Services



August 30, 1990

Center For Settlement Services, Inc.
P.O. Box 3034
Mammoth Lakes, CA 93546

Attention: Mimi E. Lyster
Executive Director

Re: North Village Project "Specific Plan"

Dear Ms. Lyster:

Thank you for furnishing us with the latest draft of the "Specific Plan" for the North Village Project.

On behalf of Mammoth Ski & Racquet Club, one of the major condominium projects located on upper Canyon Blvd., we wish to express two significant points. First, we have no overall objection to the North Village Project as envisioned. Second, we strongly object to the closing of the lower Canyon Blvd./Minaret Road intersection. A summary of our reasons is contained in the enclosed comment form.

There are some points in the Specific Plan which deserve particular comment. The Circulation Plan is supposed to address a permanent problem in the area, i.e., traffic circulation. As drafted, it suggests on page 14 that new roadways will be created to alleviate the admittedly existing congestion. This is untrue. New roadways are not being created. Just the opposite would happen. One of the existing major thoroughfares will be eliminated. Obviously, there is a contradiction between improving traffic flow and elimination of roadways, completely aside from the impact created by the new facilities intended for North Village.

RLM-53

One of the justifications for closing of lower Canyon Blvd. is that it "will eliminate an access point onto Minaret with is characterized by steep grades and poor visibility." See page 21, paragraph 1.

RLM-54

Center For Settlement Services, Inc.
Mimi E. Lyster, Executive Director
North Village Project "Specific Plan"

August 30, 1990
Page 2

This is a flagrantly false statement. There are no "steep grades" on Canyon Blvd. If there are problems with grade levels and visibility, they are on Hillside and Forest Trail.

In summary, the only justification for taking of lower Canyon is the possibility that future expansion might make it desirable to the developer if "market/economic conditions warrant." Certainly this is a grossly inadequate reason for the Town to hazard the safety of its residents and visitors, let alone to severely degrade the traffic conditions and access to upper Canyon Blvd. RLM-55

Please consider this letter as an integral part of the attachment.

We thank you for the opportunity to comment on this matter.

Very truly yours,

Mammoth Ski & Racquet
Owners Association



Michael R. Doram
Secretary

MRD:mcd
MSRC\NVP\SPECPLAN.DFT

Enclosure

Canyon Ski & Racquet
Mr. Jack Cheldin
700 Amalfi Drive
Pacific Palisades, CA 90272

Chamonix
Mr. Barrie Scott, Manager
P.O. Box 361
Mammoth Lakes, CA 93546

Courcheval
Mr. Ron Day, Manager
P.O. Box 7371
Mammoth lakes, CA 93546

Crestview
Mr. Jim Connelly, Manager
P.O. Box 9025
Mammoth Lakes, CA 93546

Lakeview Villas Owners Association
Mr. Mike Williamson, President
19401 Santa Rita
Tarzana, CA 91356

Mammoth Estates
Mr. Larry Adams
2510 Astril Drive
Los Angeles, CA 90046

Mammoth West Owners Association
Mr. J. Robert Maddox, Esq., President (P.O. Box 1117
Suite 2200 MML, CA 93546)
1900 Avenue of the Stars
Los Angeles, CA 90067

Seasons Four Owners Association
Mr. Robert Sassaman, President
P.O. Box 226
Mammoth Lakes, CA 93546

Ralph K. Rea
22331 Algnas Road
Woodland Hills, CA 91364
(Executive Board Member)

St. Anton Owners Association
Mr. Walt Wilson, President
P.O. Box 427
Mammoth Lakes, CA 93546

San Sierra Owners Association
Mr. John R. Jones
P.O. Box 953
Mammoth Lakes, CA 93546



February 16, 1990

RECEIVED

FEB 26 90

FILE _____

CALL DATE: _____

Brian N. Hawley
Planning Department
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Re: North Village Project
Closure of lower Canyon Blvd.

Dear Mr. Hawley,

This concerns your letter dated January 25, 1990, to Henry Covington, Chairman, Mammoth Estates Owners Association.

Preliminarily, I note that you did not provide me a copy of your letter, although it characterizes my letter as misleading. Common courtesy would indicate that you should have replied directly to me or at least furnished me a copy of your letter.

You indicate that I misunderstand many of the project details relating to proposed road closures and road improvements. Perhaps that is because I have relied in large part on the Draft EIR of April 1989. It does not contain the "details" to which you refer. Instead, on this subject, it merely states:

"Circulation improvements to Minaret, Forest Trail, Hillside Drive, Canyon Boulevard, Lakeview Road and Lake Mary Road should be constructed and completed prior to, or in conjunction with, construction of the first hotel or retail complex on the West side of Minaret or as recommended by a Traffic consultant and/or the Public Works Director."

These are truly wonderful generalities.

To the extent any details are mentioned in the attachments to the EIR, they are in a letter of March 23, 1989, from BSI Consultants to Triad Engineering. The letter appears to be a study report, which is not binding on the Town or the North Village Project in any way. The letter mentions some possibilities under consideration, but cautions that BSI "is not intimately familiar with the actual areas," does not have an aerial photograph of the area and, significantly, "we have yet to evaluate the realigned Forest Trail and Canyon Blvd. intersections on the realigned portion of this improvement."

RLM-59

(emphasis added.) Yet, they admit the additional traffic generated by the North Village Project would mean "the intersections are bottlenecks" and "traffic movement could create serious difficulties in crossing the intersection." (Minaret/Forest Trail.) The letter frankly acknowledges that the "Minaret Rd. and Forest Trail intersection and the Minaret Rd. and Lake Mary Rd. intersections will provide the greatest problems." I am pleased that BSI consultants recognizes the central point I have made.

Interestingly, in my meeting with Rusty Gregory on February 11, he also recognized the validity of our concerns that (1) Lake Mary Road is woefully inadequate to handle the new traffic and (2) Forest Trail-Hillcrest access to Canyon is equally inadequate.

RLM-60

Our main differences with Mr. Gregory during the meeting were his assumption that (1) traffic on the "realigned" Canyon Blvd. would be less than currently exists. (A prediction not supported by the BSI study.) (2) that a rebuilt Lake Mary Road would carry the bulk of the traffic into the Warming Hut II area (although the mechanism for accomplishing this was not specified) and (3) a Minaret Extension would solve the congestion problems. This point is not mentioned in the April, 1989 EIR.

RLM-61

In addition, we are gravely concerned that those portions of the road improvements which are under the control of Caltrans will suffer the delays typical of state agencies and not be completed prior to the closure of lower Canyon Blvd. It is significant that the April EIR merely uses the terminology that the circulation improvements "should be constructed and completed prior to, or in conjunction with construction of the first hotel or retail complex...or as recommended by a traffic consultant and/or the Public Works Director." There is no assurance whatever that the improvements will be accomplished prior to the closure of lower Canyon Blvd. This ambiguity is wholly unacceptable to those who depend upon Canyon for access to the condominium projects.

RLM-62

I understand the latest draft of the EIR arrived on February 10, 1990. Naturally, we will be interested to see whether it contains the "details" to which your letter referred. Of course there are certain other details which are of vital importance. Among them are the financing of the proposed

Brian N. Hawley, Planning Department
North Village Project

February 16, 1990
Page 3

improvements, the timing of the proposed road closure and the validity of the "guesstimate" that Canyon will have less traffic. On this point, your letter suggests Canyon will remain "a thoroughfare" to Warming Hut II.

We trust that will be the case and look forward to ensuring it will happen.

Very truly yours,



Michael R. Doram

MRD:mcd
MSRC\NVP\PLNDEPT.HAW

cc: Larry Adams,
Mammoth Estates
Jack Cheldin
Canyon Ski & Racquet Club
Bob Sassman
Seasons Four
Walt Wilson
St. Anton
Rusty Gregory
North Village Project

Canyon Ski and Racquet Club Homeowners Association



P.O. BOX 7296 • MAMMOT, LAKES, CALIFORNIA 93546-7296 • (619) 934-4747

January 18, 1990

Rusty Gregory
Mammoth Ski Area
P.O. Box 24
Mammoth Lakes, Ca 93546

Re: North Village
Canyon Blvd.

Dear Rusty:

Attached is an article from the LA Times discussing the latest earthquake on 1/14/90. The continuing earthquake danger should not be overlooked or downplayed. The people of Lakeview Loop need Canyon open for safety reasons.

On 1/13/90 from 4:00 PM to approx 8:00 PM the outlet road from Lakeview Boulevard to Lake Mary Road was closed because of snow and accident. The traffic coming down from the warming hut #2 was heavy and the Forest Trail Road and Canyon Boulevard were unable to handle the traffic. The backup was unreal. If you close Canyon and somehow Lake Mary or Forest Trail close from snow or accident tieup the people of Lakeview Loop will be subject to great hazard. How will the fire department or the paramedics get in or if a quake how will people get out? The tieup of the 13th is a sobering example. RLM-63

See the 1/11/90 article attached talking about smoke and dust pollution. The article says that Mammoth now has pollution violations. What will North Village do to the air pollution problems? RLM-64

When will the new EIR be available for review? I hope that these questions are answered in the report. What has the fire chief said about his ability to protect the Lakeview Loop when Canyon is closed? RLM-65

Maybe you can give me the answers.

Yours truly,


Jack Cheldin
President



December 29, 1989

Mammoth Mountain
P.O. Box 24
Mammoth Lakes, CA 93546

Attention: Rusty Gregory
President, North Village Association

Re: North Village Project
(Proposed Closing of Canyon Boulevard/
Minaret Road Intersection)

Dear Mr. Gregory:

On behalf of Mammoth Ski & Racquet Club, we wish to inquire whether you are irrevocably committed to the closing of the lower section of Canyon Boulevard and, in particular, its intersection with Minaret Road, as the published plans indicate.

RLM-66

As you know, Mammoth Ski & Racquet Club has 133 condominium units near Warming Hut II, whose owners and visitors all depend entirely on Canyon Boulevard for access to the site. It appears to us that the proposed closing of the intersection would be a serious mistake for several reasons.

While closing of Canyon Boulevard would be a convenience to the developers, the impact on existing projects, such as Mammoth Ski & Racquet and several of the other condominium projects which depend upon Canyon Boulevard, would be both harmful and, we believe, unnecessary. The suggested alternative access routes to the upper portions of Canyon Boulevard (Forest Trail and Lake Mary Road) are patently inadequate now when there is no serious congestion on Minaret, as would accompany the North Village development.

RLM-67

The Lake Mary road access is unacceptable because the intersection near Mountainback is presently quite hazardous in winter. That intersection, by reason of its grade and the frequent icy conditions, has the highest traffic accident rate in Mammoth. Attempting to put 4 or 5 times the volume of traffic through it simply multiplies the hazards. The use of Forest Trail to get to Canyon is presently inadequate in winter because of the relative narrowness of the road and inability to

RLM-68

move snow away from it. When the factor of the congestion associated with the North Village development is added, it is obvious Forest Trail cannot handle the additional volume of traffic.

These are two other safety related matters which cause us concern. One is the difficulty of moving fire fighting equipment on Forest Trail Road when it is either snowy or congested. The other concern is that closing the intersection of Canyon and Minaret Road blocks the ability of persons dependant on Canyon to use the "scenic route" in the event of earthquakes. The earthquake risk exists. That is why the "scenic route" was constructed. There is no adequate reason to put people in jeopardy by closing one of the main routes people have to evacuate in case of need.

RLM-69

We believe these points are properly matters which should be taken into account in the planning by Mammoth Mountain and the North Village Association, but have not been dealt with in the draft EIR of April, 1989, and we doubt they will be adequately addressed in the next draft EIR.

Since these concerns are strongly felt by Mammoth Ski & Racquet Club, we will be canvassing the viewpoints of other condominium projects dependant upon Canyon Boulevard for access. In addition, we may well conclude that additional measures will be required to protect the interests of our members.

We look forward to your meaningful response.

Very truly yours,



Michael R. Doram
Secretary, MSR

MRD:mcd
MSRC\NVP

cc: Town of Mammoth Lakes
Planning Department
P.O. Box 1609
Mammoth Lakes, CA 93546
Attention: Karen Johnston

Canyon Ski and Racquet Club Homeowners Association



P.O. BOX 7296 • MAMMOTH LAKES, CALIFORNIA 93546-7296 • (619) 934-4747

November 20, 1989

Karen Johnston
Town of Mammoth Lakes
Planning Department
P.O. Box 1609
Mammoth Lakes, Ca 93546

Re: North Village

Dear Ms. Johnston:

In the Review-Herald on 8/31/89 there was an article (copy attached) discussing woodstove pollution. The article said Mammoth is over the federal standard for emissions and that there was to be a study with the results due about the end of October 1989. What did that study show and was there any study for the extra pollution that would be created by North Village?

┌
RLM-70

Pollution is a great health hazard and should be seriously considered in the North Village EIR.

┌
RLM-71

On 8/31/89, the Mammoth Times wrote about a bobsled run and the interesting thing there was the comment by Mimi Lyster against the proposal. What has that commissioner said about the same problems of North Village? A copy of the article is attached.

┌
RLM-72

The Review-Herald on 11/9/89 (copy attached) says that Sheraton likes the corner of Canyon and Minaret. How can they consider that site until they know if Canyon will be closed or open? Do they know something that the public does not know?

┌
RLM-73

The Review-Herald on 11/9/89 (copy attached) talked about an earthquake in the eastern Sierra area. There are earthquake problems and there should be a discussion in the EIR about safety and evacuation for the Lakeview Loop owners and residents.

┌
RLM-74

During an earthquake there are generally fire problems and there has been no discussion of safety from the fire department. The EIR should address the fire and earthquake safety problems for the Lakeview Loop people.

┌
RLM-75

I have written many times in the past but you have never answered any of my questions. Are you hiding behind a technicality and ducking the questions or are you hoping that a

┌
RLM-76

new EIR will answer for you?

Polution, traffic and safety should not be taken lightly. I hope that you will respond soon.

RLM-77

Yours truly,



Jack Cheldin
President

cc: Rusty Gregory

CANYON SKI & RACQUET CLUB
Homeowners' Association
P.O. Box 7296
Mammoth Lakes, Ca 93546
(619)934-4747

October 15, 1989

Rusty Gregory
P.O. Box 24
Mammoth Ski Area
Mammoth Lakes, Ca 93546

Re: North Village

Dear Rusty:

You conducted a good meeting yesterday and I think that everyone appreciated your forthright attitude. You did not avoid any questions and your answers showed thought and consideration for all present.

I appreciate the time you spent with me after the meeting. You listened and gave me your side of our safety fears.

You told me you believe that Canyon Boulevard can be closed without causing a safety hazard to the owners and residents of the Lakeview Loop.

You know our position is that there is great danger to owners and residents if Canyon is closed. Our fear concerns fire and earthquake safety when a street like Canyon is closed to the public. Fire Chief Sweeny should tell everyone how he will protect the Loop when Canyon is closed. How will his equipment get to the fire?

RLM-78

Our minds are not closed and if you can show that closing Canyon does not impact or cause us danger we will reconsider our position on your plan for Canyon Blvd.

I appreciate your statement that should the closing of Canyon prove to be a safety hazard to owners and residents of Lakeview Loop you would keep Canyon Boulevard open.

RLM-79

We discussed the new EIR that is coming and we both know that the city can override the EIR and do what they want. Everyone should be made aware of the power of the city and then they would not be disappointed when the facts presented in the EIR are disregarded. Lets both hope that

your new EIR will clear up our doubts and fears.

Remember, we are for the North Village concept but we are
against the closure of Canyon Boulevard. Public safety
should come before profit. Please keep us on your mailing
list.

—
RLM-80
—

Yours truly,



Jack Cheldin
President

MAMMOTH LAKES
BOARD OF REALTORS, INC.

P. O. BOX 1007 • MAMMOTH LAKES, CALIFORNIA 93546

August 31, 1989

Ms. Karen Johnston
Town of Mammoth Lakes
Planning Dept.
P.O. Box 1609
Mammoth Lakes, Ca 93546

RE: North Village Plan

Dear Ms. Johnson

On behalf of the real estate industry here in Mammoth Lakes, I am compelled to relay our concerns on the proposed closing of Canyon Boulevard.

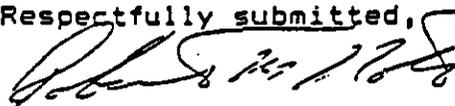
While we fully support the North Village Project itself, the closing of Canyon Blvd. may cause some serious problems for residents in the Mammoth Slopes subdivisions and tourists by Warming Hut II.

Firstly, I have discussed this matter with Chief Sweeney of our Fire department and he feels, as do we, that your alternative to closing Canyon may be insufficient and could cause a major potential fire hazard to this area. He has told me that he intends to address this problem at your next public hearing. Although he has made recommendations with direct regard to North Village, no comments have been made with respect to the areas behind the North Village Project.

Secondly, this board feels it essential that Forest Trail stay open for evacuation purposes. Even with the modifications proposed to the Lake Mary turn off to Lakeview Blvd. and those proposed to Forest Trail there is still a strong potential hazard in times of emergency situations.

Unless a better alternative can be proposed, this board urges you to allow Canyon to remain open.

Respectfully submitted,


Robert Nott, President
Mammoth Lakes Board of Realtors

cc: Jack Cheldin
Chief John Sweeney

RLM-81

RLM-82

CORRECTION
WITH OK
FROM -
R. NOTT



CANYON SKI & RACQUET CLUB
Homeowners Association
P.O. Box 7296
Mammoth Lakes, Ca 93546

August 7, 1989

Jerry Gabriel
Traffic Engineer
Caltrans
500 S Main St.
Bishop, Ca 93514

(619) 872-0601

Re: North Village Plan

Dear Mr. Gabriel:

I spoke to Joe, in your office, today and he suggested that I write to you.

The Town of Mammoth Lakes has two studies covering North Village. One dated April 1989 and one dated July 1989. Both assume the closure of Canyon Blvd.

In the April report there is a traffic study from BSI Consultants. That letter seems to say Canyon should remain open because without perfect circulation, Forrest Trail, Lake Mary Road and Hwy 203 will not be able to handle the expected traffic.

Our Association believes there is a great safety hazard if Canyon is closed. Our ability to evacuate during an earthquake will be cut by one third and in case of a fire the fire department will have a harder time getting to owners and residents on Lakeview Boulevard and Canyon Blvd. RLM-83

We also believe that no circulation plan will be able to cope with the additional traffic generated by the project. Highway 203 on Meridian between Lake Mary Road and Forrest Trail will be a mess. RLM-84

We are for the plan but we want Canyon kept open and we would like additional access developed. We do not want access taken away.

Please review the situation and let us know what you conclude.

Yours truly,


Jack Cheldin
President

CANYON SKI & RACQUET CLUB
Homeowners Association
P.O. Box 7296
Mammoth Lakes, Ca 93546

August 3, 1989

Karen Johnston
Town of Mammoth Lakes
Planning Department
P.O. Box 1609
Mammoth Lakes, Ca 93546

Re: North Village

Dear Ms. Johnston:

Enclosed is an article from the morning paper here in Los Angeles that says there could be a volcano disaster someday.

Mammoth does have the threat of an earthquake disaster and also a volcano disaster. Read the last paragraph of the enclosed article.

RLM-85

Canyon Boulevard is an evacuation route during any disaster and closure of that road could lead to additional and unnecessary deaths. The Lakeview Loop services about 30 percent of the Mammoth population and closing Canyon creates a major hazard.

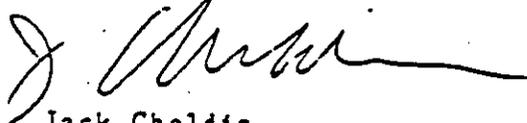
RLM-86

I wonder how the L.A. Times would portray a city that closes a road that is necessary to the public safety in times of earthquake or volcano. The Town of Mammoth Lakes does not need that kind of publicity.

The safety of owners and residents should come first. The developers should be second. It is very simple to redesign the project and keep Canyon open.

Keep me posted.

Yours truly,



Jack Cheldin
President

CANYON SKI & RACQUET
Homeowners Association
P.O. Box 7296
Mammoth Lakes, Ca 93546

July 7, 1989

Karen Johnston
Town Of Mammoth Lakes
Planning Department
P.O. Box 1609
Mammoth Lakes, Ca 93546

Re: Draft EIR Report
North Village Specific Plan
Report Dated April 1989

Dear Ms. Johnston:

The report only addresses the issues that will help the plan and completely avoids the impact on the residents and owners up and down Canyon & Lakeview.

The report clearly shows that the residents and owners will be adversely affected by the closure of Canyon Blvd. They will lose one third of their access. They will be forced to use Lake Mary Road or Forrest Trail for in or out access. No matter how it is dressed up, the fact is that access is lost and no circulation plan will replace the closed facility.

The letter from the fire chief does not cover the safety issues. How will the fire department be able to respond to a fire during peak traffic periods when Canyon is closed? What happens when the traffic is high and the snow conditions are bad? Can the city traffic department guarantee that the fire department will get through if the circulation is not perfect?

The report contains no comment on earthquake safety. How will the residents and owners get out if Canyon is closed? Earthquake must be an important item because an evacuation road was built some years back. There should be some comment as to how people will evacuate when one third of the outlets are closed.

The BSI Consultants letter of 3/23/89 was fairly clear. With Canyon open the flow is OK but with its closure there is no real substitute and they project problems unless perfection is maintained. They do not say how to keep a

RLM-87

RLM-88

RLM-89

RLM-90

perfect circulation pattern. They did not discuss the impact on the residents and owners along Canyon and Lakeview. They do warn of problems during peak flow and heavy weather. They also hope that 80% of the North Village people will use a bus system that will be created. What happens when 80% do not use the bus system? Where do 80% of the people at a ski resort use the bus system? Their letter leaves many unanswered questions.

The report seems to indicate that the closure of Canyon will help North Village only. The present users of Canyon will be hurt. Where are the safety considerations in the plan? Total abandonment of the residents and owners of Canyon and Lakeview should not be tolerated.

RLM-91

Our association can not agree to the closure of Canyon Blvd. We also believe that all residents and owners of Canyon and Lakeview should be solicited for comments. In this situation your 300 foot rule for notice is just sneaky.

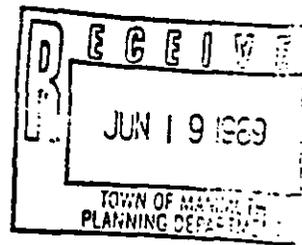
Please keep our association on your list for all mail regarding North Village.

Yours truly,



Jack Cheldin
President

CANYON SKI & RACQUET CLUB HOA
P.O. BOX 7296
MAMMOTH LAKES, CA 93546
(213)934-4747



June 15, 1989

Karen Johnston
Planning Department
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, Ca 93546

Re: North Village

Dear Karen:

In my letter to you dated 6/1/89. I felt that Canyon should not be closed because of the access problem. More thought has led me to believe that a very serious problem will be created by the Canyon closure.

RLM-92

In case of fire the fire department can get to us by three access roads. The closure of Canyon would cause great safety problems. If a fire happened when the ski hill was emptying and there were only two access roads the fire fighters would not be able to get to us easily.

RLM-93

Some years back the town put in an escape road for earthquake safety and I think that closure of any part of Canyon could be life threatening during an earthquake panic.

RLM-94

I believe that access and safety are one and the same when talking about Canyon and again I must point out that our association will be against any closure.

Yours truly,


Jack Cheldin
President

attached: letter of 6/1/89.

CANYON SKI & RACQUEST CLUB HOA
143 LAKEVIEW BLVD.
P.O. BOX 7296
MAMMOTH LAKES, CA 93546
(619)934-4747

JUNE 1, 1989

KAREN JOHNSTON
PLANNING DEPARTMENT
TOWN OF MAMMOTH LAKES
P.O. BOX 1609
MAMMOTH LAKES, CA 93546

RE: NORTH VILLAGE

DEAR KAREN:

THANK YOU FOR THE TIME AND COURTESY YESTERDAY WHEN YOU ANSWERED MY QUESTIONS ABOUT THE NORTH VILLAGE PLAN.

I WAS SURPRISED THAT OUR ASSOCIATION HAD NEVER BEEN NOTIFIED OF THE PLAN BUT YOU ADVISED THAT THE CITY WAS ONLY OBLIGATED TO NOTIFY PROPERTIES WITHIN 300 FEET OF THE PLANNED PROJECT.

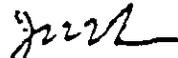
THE ITEM THAT DISTURBED ME WAS THE FACT THAT THE PLAN PROPOSES THE CLOSURE OF THE FIRST BLOCK OF CANYON BLVD. THIS WOULD MEAN THAT WE WOULD HAVE TO USE FORREST TRAIL OR LAKE MARY ROAD FOR ACCESS. RLM-95

I DO NOT BELIEVE THAT THE DEPARTMENT HAS CONSIDERED THE EFFECT THE CLOSURE WILL HAVE ON ALL ASSOCIATIONS ON CANYON BLVD., AND THOSE ON LAKEVIEW BLVD. MAYBE IT WAS THOUGHT OF AND THAT IS THE REASON NO ONE WAS NOTIFIED.

WE ARE NOT AGAINST THE NORTH VILLAGE CONCEPT BUT WE ARE AGAINST THE CLOSURE OF ANY PART OF CANYON BLVD. I AM SURE THAT ANY QUALIFIED ARCHITECT CAN DESIGN THE BUILDING LEAVING CANYON OPEN. THE AREA NEEDS EVERY BIT OF ACCESS IT HAS AND TAKING ANY AWAY WOULD BE CRIMINAL. RLM-96

OUR ASSOCIATION IS AGAINST THE CLOSURE OF ANY PART OF CANYON BLVD., AND WE WOULD LIKE TO HAVE NOTICE OF ANY THING THAT AFFECTS US EVEN WHEN WE ARE NOT WITHIN THE 300 FOOT LIMIT.

YOURS TRULY,


JACK CHELDIN
PRESIDENT

(619)934-6113
(213)454-5559

COMMENTS ON POSSIBLE ENVIRONMENTAL EFFECTS OF THE
NORTH VILLAGE PROJECT SPECIFIC PLAN

1. I expect the environmental effects from the North Village project as defined in the Final Specific Plan to be:

1. Safety Hazards

(a) Severe and unacceptable impairment of the ability of occupants of those condominiums located along upper Canyon Blvd. to have immediate access to the alternate exit from the Town of Mammoth Lakes in the event of emergencies such as earthquake or volcanic activity. RLM-97

(b) Inadequate access by fire or emergency vehicles to Upper Canyon. There is no assurance that the proposed improvement of the turning radius of Hillside/Canyon onto Forest Trail will enable access by fire or emergency vehicles to Upper Canyon Blvd., particularly during snow conditions. RLM-98

2. Economic Impact

Those condominiums along Upper Canyon Blvd. will be isolated from the normal traffic flows and become much less desirable as second homes or investment properties. The intention is plainly to reduce traffic on Canyon and thereby cause fewer visitors to stay at condominiums on upper Canyon. RLM-99

2. I suggest that any negative effects that I have identified can be either minimized or eliminated by:

Rejecting the proposal to close the lower Canyon Blvd./Minaret Road intersection. RLM-100

We note there are no immediate plans by the developer to build on this site in any event.

All the benefits envisioned from using a signal light and right hand turn lane at Forest Trail/Minaret can be better used at Canyon/Minaret. RLM-100

Signed: Michael R. Dorn Dated: 8/30/90
Address: Secretary, Mammoth Ski & Racquet Club
Owners Association, P.O. Box 1847, Mammoth Lakes, CA

MSRC\NVP\SPECPLAN.DFT

RLM-1 The ski lift (gondola) is a proposed element of the North Village Specific Plan. The traffic analysis was performed to assess the impacts of the Specific Plan as proposed; therefore traffic conditions without the ski-lift facility were not quantitatively evaluated.

RLM-2 See Response to Comment RLM-1.

RLM-3 The North Village Specific Plan (NVSP) does not redesignate Lakeview Boulevard as an arterial. Lakeview Boulevard would remain a collector street under future traffic conditions. A General Plan Amendment has been filed to delete that portion of Canyon affected by the realignment as a collector street.

RLM-4 Lakeview Boulevard remains as a collector road consistent with the General Plan. Please refer to Response to Comment RLM-3.

RLM-5 Please refer to Response to Comments RLM-3 and RLM-4.

RLM-6 Providing two primary points to access an area like Warming Hut II and the surrounding residential and lodging facilities is very common and adheres to the basic traffic engineering standards and guidelines. It minimizes the intrusion of "through" traffic which is undesirable in a primarily residential area. In addition, both access points are proposed to be improved to create a safer circulation system.

Unless there is some specific objection from the agencies (police and fire) providing emergency services, two points of access can be expected to adequately address the circulation needs in times of emergency. The proposed geometric improvements (reduced grads and widening on Lakeview Road and the similar improvements to Lakeview Boulevard, Lake Mary Road, and Canyon Boulevard) will improve the ability of these roadways to be used for all-weather access to the area.

RLM-7 See Response to Comment RLM-6.

RLM-8 The proposed NVSP circulation system analyzed does not include Spring Lane as a through street from Minaret Road to Hillside Drive. Spring Lane is proposed as a minor service roadway to access underground parking structures of North Village. The EIR (Traffic and Circulation section) is responsible for analyzing the NVSP proposed circulation system. Subsequent analysis would be appropriate if Spring Lane provided a direct continuous connection from Minaret Road to Hillside Drive. However, under this circulation scenario, the intersection of Spring Lane and Minaret Road would potentially need to be signalized, since Spring Lane would carry most of the traffic volumes currently accommodated by Canyon Boulevard. This would create the same undesirable impacts on Minaret

Road that would be caused by not rerouting Canyon Boulevard to Forest Trail.

- RLM-9 See Response to Comment RLM-6.
- RLM-10 Please see Response to Comment RLM-7.
- RLM-11 Please see Response to Comment RLM-15.
- RLM-12 Please see Response to Comment RLM-15.
- RLM-13 The general notion of establishing the proposed North Village Specific Plan as the activity node for the Town of Mammoth Lakes would be consistent with the Town of Mammoth Lakes General Plan and Zoning Ordinance of the GPA are adopted.
- RLM-14 See Response to Comment RLM-2.
- RLM-15 There is spacing of approximately 630 feet on Minaret Road between the intersection of Canyon Boulevard and Main Street. The current spacing of the three intersections is inconsistent with the General Plan policy of having 1/4 mile intervals between collector streets that intersect arterials. This policy recognizes the findings of the 1985 Highway Capacity Manual which clearly indicate that travel speeds and capacity can be reduced by up to 20% by intersection spacing of less than 1/4 mile. The traffic engineering professional also recognizes that closely spaced intersections that are not evenly spaced preclude the effective use of signal coordination (synchronization) to progress traffic on arterials like Minaret Road.
- RLM-16 See Response to Comment RLM-15.
- RLM-17 See Response to Comment RLM-15.
- RLM-18 See Response to Comment RLM-15. Further, the statement in reference was made to indicate that existing traffic conditions dictate that this intersection would need to be signalized. It does not represent conclusions to the effect that Canyon Boulevard remain open as a mitigation measure. Keeping Canyon Boulevard in its current alignment and signalizing this location would not help to mitigate impacts from the NVSP, but would rather have an adverse impact to traffic progression on Minaret Road.
- RLM-19 Traffic volume will have to double in order to reach the noise levels suggested. The Plan does not redesignate Lakeview Boulevard as an arterial, it would remain a collector street under future traffic conditions.
- RLM-20 See Response to Comment-19.

- RLM-21 The effects of an improved transit system are further addressed in the final EIR.
- RLM-22 See Response to Comment RLM-21.
- RLM-23 See Response to Comment RLM-6.
- RLM-24 See Response to Comment RLM-6.
- RLM-25 Comment noted. Please see Response to Comment RLM-7.
- RLM-26 Comment noted.
- RLM-27 See Response to Comment RLM-3. Further, provision of bicycle and pedestrian routes and vehicular trip reduction measures include in the Plan are all consistent with items #1 to #7 in the General Plan.
- RLM-28 See Response to Comment RLM-15.
- RLM-29 See Response to Comment RLM-15.
- RLM-30 The "Programmed Improvements" presented in the EIR are those which the Town is planning to implement which will directly affect the NVSP. The improvement of the Canyon Boulevard/Minaret Road intersection is not expressly stated in the General Plan.
- RLM-31 The phasing for the necessary roadway improvements and the rerouting of Canyon Boulevard in relation to development of the NVSP are addressed in the revised EIR. The NVSP states that development of the North Village area will occur during a 10-15 year period. Therefore, it is unlikely that North Village would fully develop before MMSA facilities are expanded. A vast majority of the ski trips from the NVSP to Warming Hut II will be made using the proposed gondola. Also, the existing parking supply at Warming Hut II will not increase. Additional trips to this facility would have to use non-vehicular modes such as transit, gondolas, walking, etc. Therefore, "short-term" impacts are not expected to exceed the cumulative traffic impacts identified in the EIR.
- RLM-32 See Response to Comment RLM-31.
- RLM-33 The traffic analysis was performed to assess traffic impacts from the proposed NVSP. This plan includes the rerouting of Canyon Boulevard and Forest Trail and elimination of the Canyon Boulevard/Minaret Road intersection. The Level of Service analysis was performed at this intersection solely to address current conditions in order to provide the setting for the traffic analysis.

- RLM-34 The EIR does not assign a design criteria of 40 mph for Lakeview Boulevard. Lakeview Boulevard would not need to be widened to increase capacity with future traffic, although some physical improvements may be necessary to safely accommodate traffic flow for winter conditions. Another improvement could be removing parking from Lakeview. Details will be part of the project approval at design review stage.
- RLM-35 See Response to Comment RLM-34.
- RLM-36 See Response to Comment RLM-34.
- RLM-37 The intersection of Forest Trail/Minaret Road under cumulative conditions is projected to operate at LOS "D" (V/C of 0.83), which is close to LOS "C". This condition is expected to occur only during the peak ski days of the year (3%-6% of the time), and the operation of the intersection would most likely improve to LOS "C" or better during typical weekdays and the summer months. The emphasis of transit in a Transportation Land Management program will also reduce intersection impacts.
- RLM-38 Lakeview Boulevard is classified as a collector road in the General Plan (the same designation given to Canyon Boulevard). The General Plan states that collector roads "should be built to encourage through use". Therefore, partially diverting traffic from one collector road to another is not inconsistent with the policies of the General Plan, especially considering that Canyon Boulevard also traverses residential neighborhoods.
- RLM-39 Please see Response to Comment RLM-7.
- RLM-40 See Response to Comment RLM-15.
- RLM-41 See Response to Comment RLM-3.
- RLM-42 Comment noted.
- RLM-43 See Response to Comment RLM-8.
- RLM-44 See Response to Comment RLM-15.
- RLM-45 See Response to Comment RLM-3.
- RLM-46 Mr. Liebersbach's opinions are noted. There would be some benefits, in terms of safety and travel flow, with complete prohibition of parking on Lakeview Boulevard.

- RLM-47 The EIR does not state that traffic flows at Warming Hut II will be decreased as a result of the NVSP. General Plan policies include diverting some of the current skier usage of Warming Hut II to other ski areas planned for expansion. The General Plan designates that the existing parking supply at Warming Hut II will remain. The ski lift at North Village is oriented for skiers staying within walking distance of the lift and those accessing the facility via public transit. It is not intended to supplant vehicular access to Warming Hut II.
- RLM-48 See Response to Comment RLM-21. As presented in the EIR, the development of a comprehensive transit system would significantly contribute to the reduction of vehicular trips. However, previous studies on the applications of transit have shown that, although transit can effectively contribute to a reduction in vehicular trips, it will not completely replace the need for capacity improvements since they are needed for the transit system. Rather, transit use in conjunction with adequate roadway capacity are necessary to provide an effective and balanced transportation system.
- RLM-49 See Response to Comment RLM-46.
- RLM-50 Mr. Liebersbach's opinion are noted.
- RLM-51 See Response to Comment RLM-47.
- RLM-52 Mr. Liebersbach's opinions are noted. The revised EIR addresses timing of roadway improvements needed in conjunction with the development of the NVSP.
- RLM-53 through RLM-100 Comments referring to North Village Plan rather than the DEIR.

February 3, 1991

Ms. Karen Johnston
Assistant Planner
Town of Mammoth Lakes

Subject: North Village Specific Plan Draft EIR dated Dec. 1990

Dear Ms. Johnston,

I am a part time resident of Mammoth at 127 Hillside Drive
(Mammoth Slopes I, lot 55) and am interested in the nearby pro-
posed North Village development.

I have read the draft EIR and have found some elements of the
project which concern me. I am submitting these concerns in this
letter. Also, I have included a short list of apparent errors
which I noticed in the EIR.

Very truly yours,

Ronald Wann

Ronald Wann
4600 Glencoe Ave. #6
Marina del Rey, CA 90292
(213) 821-1134

CONCERNS:

RW

1. LIGHT INTRUSION/POLLUTION

Many visitors (and probably residents also) enjoy the beauty of the night sky at Mammoth. This is possible because the air is clear and there is the near-absence of light from man-made sources. I think that this natural attraction should be preserved by minimizing the intensity of lights and by confining the light to the required areas only.

Page 4.12-3 states as an endnote to the Light-Glare section: "The Town of Mammoth Lakes currently has a sign ordinance prohibiting neon signs; thus, there would not be any glare from signs." Aren't there signs other than neon type which are illuminated from within or from an external spot or flood light which also can produce glare? If so, then the conclusion stated is not valid.

RW-1

2. CHANGES TO HILLSIDE DRIVE

If Canyon Blvd. is closed east of Hillside Dr., and realigned to facilitate the flow of traffic along Hillside Dr. between Canyon Blvd. and Forest Trail, then, won't it be necessary to widen Hillside Dr. to a width comparable to that of Canyon Blvd? I found nothing mentioned about this in the EIR. What changes would be made to Hillside Drive?

RW-2

3. TRAFFIC/NOISE ON HILLSIDE DRIVE

Page 4.7-10; The first paragraph states: "Ten intersections in the study area can expect to be measurably impacted by the proposed project and for that reason were evaluated throughout the study." A list identifying the ten intersections is then given. Won't the intersections of (1) Canyon Blvd. and Hillside Dr. and (2) Forest Trail and Hillside Dr. be measurably impacted? These two intersections are not included in the list.

RW-3

Page 4.9-6, Table 4.9.3 gives projected peak noise levels in the area of the proposed project. One location shown is on Forest Trail west of Minaret (item 4 of list). For this location, the existing level is given as 61 dBA with 69 dBA projected after the proposed project and cumulative development take place. Assuming that most of the traffic passing this point also passes over Hillside Drive and Canyon Blvd. (this being the proposed local collector route), then won't the noise levels along this route reach a level close to the 69 dBA predicted? If the 69 dBA level is reached along these residential streets, won't there be a significant impact on the residents along these streets? This isn't mentioned in the EIR.

RW-4
RW-5

Page 4.9-8, 4th paragraph states: "Setbacks from streets generating noise in excess of 60 dB have not currently been defined for the proposed project and therefore a determination of the potential for a significant noise impact on a specific type of

RW-6

land use cannot at this time be determined." However, setbacks from streets adjoining the proposed project and along the streets which the proposed project will transform into collectors are, I believe, presently defined and a determination of the potential for a significant noise impact on these residences could at this time be determined. Shouldn't this be addressed in the EIR?

On page 4.7-38, the first paragraph states that skier traffic will be rerouted from Warning Hut II to Lake Mary Road to relieve congestion at the Forest Trail-Minaret Road intersection. What is to prevent many skiers from using the Canyon Blvd./Forest Trail route if that is more direct?

RW-7

4. PROPOSED USE OF LOT 57 IN MAMMOTH SLOPES I

This lot is part of the plan and is proposed for "Specialty Housing" use. I feel that this is improper for two reasons.

Firstly, it would be out of character and incompatible with the surrounding neighborhood which consists of single family residences. Both the EIR and the Specific Plan incorrectly show the zoning of this lot to be Residential Multiple Family--it is actually zoned as Residential Single Family.

RW-8

Secondly, due to the proposed closing of Canyon Blvd. and realignment of the intersection at Hillside Drive, the lot will probably be reduced in size so as to be unsuitable for any dwellings. According to statements on page 4.7-39 of the EIR, the minimum recommended curve radius for a 30 mph street such as Canyon Blvd. is 300 feet. If the corner at Canyon and Hillside were realigned with a 300 foot radius, then a significant part of the corner lot, No. 57 would be taken by the realigned street.

RW-9

5. AESTHETICS

If high-rise hotels are allowed to reach heights of 100 feet above natural grade as stated, won't there be a significant negative visual impact, especially for residents in the Mammoth Slopes area?

RW-10

Why is the maximum height requirement stated as 100 feet from natural grade or Plaza level ??

RW-11

APPARENT ERRORS IN DRAFT EIR

1. Page 2-7, Figure 2.4-1 and page 2-9, figure 2.4-2 refer to the proposed gondola as "Lift to Top of Lift 16". This disagrees with the proposed gondola route shown on page 4.11-10, figure 4.11-5, which shows the gondola terminating at Warming Hut II.

RW-12

2. On Page 4.5-6, Table 4.5-5; The column headed Emp/Unit should read:

Emp/Unit or Sq. Ft.

- 0.10
- 0.30
- 1/500
- 1/300

RW-13

3. On Page 7-11, it is stated that the biological resources would be impacted by Alternative 3 as follows:

"At the Alternative Project site, development would result in a similar disruption and loss of native plant and wildlife communities than on the proposed project site."

RW-14

Wouldn't there be a much larger disruption and loss of plant and wildlife at the Alternative Site, since it is presently undeveloped, whereas the proposed site already has 36 of the total 64 acres developed?

Note: In Section 7, Alternatives To The Project, when a possible impact of alternative No. 2, the reduced scale project, is being discussed, it is sometimes compared to the impact of no project and sometimes compared to the impact of the proposed project. For the sake of clarity, a consistent comparison method should be used.

RW-15

- RW-1 Please see Mitigation Measures 4.12-1(a) through 4.12-1(c).
- RW-2 The re-aligned segment of Hillside Drive from Canyon Boulevard to Forest Trail would be comparable in width to Canyon Boulevard. The segment of Hillside Drive would be realigned to provide continuous through traffic flow from Canyon Boulevard onto Forest Trail east of Hillside Drive.
- RW-3 The intersections of Canyon Boulevard and Forest Trail at Hillside Drive would not experience significant traffic increases due to the NVSP. Although the proposed realignment would physically alter these intersections, the projected future traffic levels would not measurably impact these locations. A quantitative LOS analysis was therefore not performed for these intersections.
- RW-4 Traffic would be dispersed between Forest Trail, Canyon Boulevard, and Lakeview Boulevard, therefore, these would be much lower. Doubling traffic volume would be required to increase noise levels beyond 2dB.
- RW-5 Noise impacts on these streets would not be significant.
- RW-6 These would be required when site specific plans are presented to the Town for design approval.
- RW-7 See Response to Comment TG-15.
- RW-8 Comment noted. The North Village Specific Plan and the Town of Mammoth Lakes General Plan must be made consistent. If lot 57 is not correctly designated as "Residential Multiple Family", discretionary actions must consider issues of land use compatibility. A General Plan Amendment is being processed in conjunction with NVSP.
- RW-9 Comment noted.
- RW-10 Please refer to Impact 4.11-1 and Response to Comment TG-9. Also, please note that the Mammoth Slopes residential area is, for the most part, located upslope and to the west of the North Village Project site, and as a result, views to the site from this area are limited.
- RW-11 Height requirements for the West Plaza area of the site are defined as measured from natural grade or plaza level because the actual base of plaza buildings will be constructed on the roof of the subterranean parking garage. Subsequently, the maximum height of full-service hotel development in the plaza may range from 100 to 115 feet above grade. As specific developments within the North Village Specific Plan area are proposed, and the specific heights of buildings are determined, they will be subject to design review, and the approval of the Town

of Mammoth Lakes Planning Commission.

RW-12 See Response to SOC-1. The "proposed gondola" is, at this stage, not designed. Neither has the final origin or destination been established. This preliminary stage is reflected in the differing configuration noted by the commentor, which appear in drawings supplied by the Project proponent.

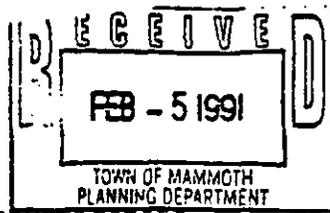
RW-13 Commentor is correct.

RW-14 The text on page 7-11 has been revised to read as follows:

"At the Alternative Project site, development would result in a greater disruption and loss of native plant and wildlife communities than on the proposed Project site".

RW-15 Upon a close reading of this section, the reader will find that the "Reduced Scale Alternative" is consistently compared with the proposed Project.

RNS



Mammoth Lakes Planning Department January 31, 1991
P.O. Box 1609
Mammoth Lakes, CA 93546

RE: DRAFT EIR for North Village Specific Plan

Dear Sir,

The Seasons 4 Owners' Association is concerned with the inadequacy of the Traffic portion (Section 4.7) of the DRAFT EIR for the North Village Specific Plan. In particular we are concerned that the mitigation proposed for the closure of Canyon Boulevard at Minaret Road, which provides for improvements to the Lake Mary Road/Lakeview Road intersection is inadequate.

Lakeview Road between Lakeview Boulevard and Lake Mary Road has been often closed during snow storms thus limiting access to the homes and condominiums in the Warming Hut II area to Minaret Road via Canyon Blvd. or Forest Trail. If the improvements proposed to Lakeview Road and the Lakeview Road/Lake Mary Road intersection are not conducive to keeping Lakeview Road open at all times then vehicular access to this area will be from the Forest Trail/Minaret Road intersection only, which has safety and health consequences.

We recommend that the mitigation proposed for the closure of Canyon Blvd. at Minaret Road (Page 4.7-29 of DEIR) provide for the following:

(1) that the reconstruction of the Lakeview Road/Lake Mary Road intersection will upgrade Lakeview Road to an all-weather traversable roadway;

(2) that the reconstruction of the Lakeview Road/Lake Mary Road intersection be completed and open to traffic prior to the closure of the Minaret Road/Canyon Blvd. intersection.

Please include us on the mailing list for notification of the time and place of the public hearing and for any supplemental information available regarding the Specific Plan or Environmental Document.

Thank you for the opportunity to provide comments on your DEIR.

Sincerely yours,

Robert W. Sassaman
President, Seasons 4 Owners' Association
P.O. Box 226
Mammoth Lakes, CA 93546

RWS-1

RWS-2

RWS-3

- RWS-1 See Response to Comment RLM-6.
- RWS-2 See Response to Comment RLM-6.
- RWS-3 See Response to Comment RLM-6.

SUMMARY OF COMMENTS ON NORTH VILLAGE DEIR

1. SUMMARY

1. Summary of Proposed Action, p.1-1: The last sentence in this first paragraph is totally incorrect. The North Village Specific Plan is essentially a General Plan Amendment and Zone Change. Implementation of the plan will result in the activation of brand new zoning designations for the North Village parcels. *The parcels do not retain the existing general plan and zoning designations under the proposed Specific Plan, because the Specific Plan creates new designations.*

SOC-1

SOC-2

2. PROJECT DESCRIPTION

1. P#2, p. 2-1: The last sentence of this paragraph is not true. The project drawings prepared by Jack Johnson Company are conceptual only. The actual development may vary considerably. The project that is supposed to be evaluated by this EIR is the North Village Specific Plan and the development standards and guidelines that plan proposes. The project proponents have no idea what may be constructed on each individual parcel in North Village, particularly on those parcels located outside the Plaza Area.

SOC-3

3. GENERAL DESCRIPTION AND ENVIRONMENTAL SETTING

1. Related Projects Table, p.3-2: Many of the projects listed in this table are at various stages of the planning process and do not actually exist. Some of the projects listed have not even been submitted to the Town and others have not yet been approved. It is misleading to include such a list in the Environmental Setting section without identifying which projects are constructed and which are merely in the planning stage. Furthermore, most of these projects are not "similar" to the North Village Specific Plan. The key concept in the NVSP is the development of resort recreational facilities with a strong pedestrian orientation. The only projects which may exhibit a degree of similarity are certain portions of the Snowcreek project, Juniper Ridge (with the exception of the single family home phase), and possibly Lodestar. The other projects listed have very little in common with North Village.

SOC-4

SOC-5

4.1 GEOLOGY, SOILS, AND SEISMICITY

1. Figure 4.1-5, Land Forms: The source of this figure is not the North Village Specific Plan. No figure depicting this type of information was included in the plan.

SOC-6

2. Impact Analysis: General Comment: It is not identified in

this section which impacts related to soils and geology are potentially significant and which are considered insignificant. It is important to discern this and, in the case of potentially significant impacts, to identify if the proposed mitigation measures are sufficient to reduce these impacts to levels of insignificance.

SOC-7

3. Impact 4-1-1, p. 4.1-20: No ponds are proposed for the North Village project, therefore there is no threat of saturation of downslope areas.

SOC-8

4. Impact 4-1-2, p. 4.1-20: The North Village project area is located along previously constructed portions of Minaret Road. The engineering and construction of the Minaret Road extension has little bearing on the North Village project.

SOC-9

5. Impact 4.1-5, p. 4.1-22: Which parts of the project are near a creek valley where floods are likely to concentrate? If none of the project area is located within identified floodplains, then the last P of this discussion should be eliminated.

SOC-10

SOC-11

4.2 HYDROLOGY AND WATER QUALITY

1. Impact 4.2.1, p. 4.2-8: Under the NVSP, development will occur only on lands already designated for development under the existing General Plan. Over 1/2 of the developable land within North Village is already developed. If the existing zoning ordinance and the NVSP development guidelines are closely examined, one will note that the site coverage limits are very similar in both documents. The only exception to this is the Plaza area, which accounts for only 24% of the total project area (and some of this is already developed and paved). The fact that project densities may be increased (due to bonuses provided for projects with underground parking) and thus "intensify" land use in the North Village has no bearing on surface runoff, because coverage levels are similar.

SOC-12

2. Mitigation Measure 4.2.1(b), p. 4.2-8: The requirement to install off-site retention basins should be removed because there is no guarantee that additional lands can be secured to construct off-site basins. Mitigation measures related to drainage should be required to be implemented on-site, with the opportunity for off-site mitigation if the developer and Town see fit.

SOC-13

SOC-14

3. Mitigation Measure 4.2.1(c), p. 4.2-9: It will not be possible to construct the Plaza area out of pervious material, because the base of the Plaza will be the roof of the underground parking structure, which will be constructed of impervious material.

SOC-15

4.3 BIOLOGICAL RESOURCES

1. Setting, p. 4.3.1: There is still no mention that over 50% of the project property is already developed and that the only

areas of potentially significant habitat are south of Main Street, parcels 14 & 15, and the USFS parcel that is proposed to be preserved as open space.

SOC-16

2. Wildlife, p. 4.3-3: Wildlife habitat along Main Street and North on Minaret is very limited. Any large wildlife species in these areas (such as bear or coyote) are there only because of their adaptation to the already urbanized character of these portions of the Specific Plan area (ie. foraging in dumpsters). The only true habitat areas available for large species of wildlife are those larger areas of undisturbed property.

SOC-17

SOC-18

3. Impact 4.3.2, p. 4.3-6: Why not quantify the area that will be subject to change from conifer forest to urban development. Again, the actual area of existing quality habitat is limited in North Village and this existing limitation should be stated.

SOC-19

SOC-20

4.4 LAND USE AND PLANNING

1. Setting, p. 4.4-1: a). The White Mountains do not really surround Mammoth Lakes on the East. They are located approximately 50-60 miles east of Mammoth. b). The MM3A has been hosting over one million skiers since 1978, not 1988. c). The statement "Because winter tourism is more diffused.." is incorrect and should read "Because summer tourism is more diffused.."

SOC-21

SOC-22

SOC-23

2. Setting, p.4.4-2: I cannot believe that North Village is currently considered an "existing distinct shopping area". There is no facility in North Village (such as a Plaza or Mall building) that provides any kind of identity to the area in terms of shopping.

SOC-24

3. Setting, p.4.4-3: The fact that there may be some potentially non-conforming industrial uses in the Old Mammoth Commercial District has absolutely no bearing on North Village, particularly in light of the fact that North Village is strictly a resort commercial, not industrial, development plan. The issue referenced here is politically sensitive, and we do not need to stir the pot by having it mentioned for no reason in this document.

SOC-25

4. Setting, p.4.4-3: What relationship does the last paragraph in this section have to do with the existing setting? It makes no sense to include characteristics of the proposed plan in the existing setting section.

SOC-26

5. General Plan Policies, p.4.4-3: The word "mode", used twice in this section, should be "node".

SOC-27

6. Zoning Plan, p. 4.4-5: Under existing conditions, the lands designated C-L and C-G could have most types of the listed uses with the approval of a Use Permit. The next sentence makes no sense, however. The Land Use Matrix is referenced as if it were a part of the existing Town Zoning Ordinance. It is not. It is a

SOC-28

SOC-29

brand new list of allowable uses for the new zoning designations proposed in the NVSP. Although Table 7 of the Specific Plan may bear some resemblance to the Land Use Matrix included in the Zoning Ordinance, they are not the same.

SOC-30

7. The North Village Specific Plan Area Development, p.4.4-6:

The closing parenthesis in the first paragraph is improperly located. It should be placed to enclose only the phrase "in addition to 30 existing condominiums", and not the rest of the phrase. The following word, "parcels" should be capitalized as it is the start of a new sentence.

SOC-31

SOC-32

8. The North Village Specific Plan Area Development, p.4.4-6:

Most of this first paragraph is taken verbatim from the Specific Plan, and that is fine. However, the supporting commercial estimates of 191,000 square of retail and 60,000 square feet of restaurant space should be explained and not just included as if this were what is proposed in the plan. These are estimates that have been exclusively developed by the authors of the EIR, but that is not made clear in this paragraph. The method of calculating this commercial space should be included in the text of the document and not just sketchily referenced at the back of the Land Use section. I stress this because the amount of commercial space that could be constructed in North Village under the new development standards proposed in the Plan is one of the most critical land use issues that this EIR should address.

SOC-33

9. The North Village Development Phasing Plan, p.4.4-6: It is unclear what the authors are trying to say in the third sentence of this section, regarding the facilities planned for construction. The plan itself provides the land use guidelines and development standards for the area; the facilities proposed for construction in the plaza reflect what is possible to be constructed under the NVSP. It would probably be best if this sentence was just removed because it is not necessarily true.

SOC-34

10. Present Pattern of Development of North Village, p.4.4-8:

Currently, lands within North Village cannot be developed as a Specific Plan Area, because there is no approved Specific Plan for the area. Currently, the only development alternative available for the properties is development according to the Town General Plan and Zoning Ordinance. Once this Specific Plan is approved, it will replace the existing General Plan and Zoning Ordinance for the North Village properties, and at that point, parcels within North Village will be required to be developed according to the guidelines presented in the NVSP.

SOC-35

11. Present Pattern of Development of North Village, p.4.4-8:

The last sentence on this page was incorrectly paraphrased from the NVSP and the error is significant. The authors should refer to page 31 of the NVSP and they will see that this statement should read that following adoption of the North Village Specific Plan (ie. not the *Town Specific Plan*), uses within the project area will be required to be compatible with the development guidelines established in this Specific Plan (not the *Town General Plan*).

SOC-36

Again, the entire purpose for this project is to propose new land use designations, that while generally conforming to the existing General Plan and Zoning Ordinance, will actually serve to *replace* the existing land use designations and development guidelines for the properties.

SOC-37

12. Present Pattern of Development of North Village, p. 4.4-10, P1: While the PKF report may have suggested phasing development of North Village, the report did not recommend the phasing plan that was included in the NVSP. The authors of the NVSP developed *that* phasing plan. The phasing plan included in the NVSP is only a tentative plan, as it is impossible to regulate development on parcels that are under so many individual ownerships.

SOC-38

13. Impact 4.4-1, p.4.4-11: While it may be appropriate to discuss the land use compatibility of the gondola in this document, the issue of the gondola right-of-way is a legal issue, and should not be a point of discussion in this EIR. If the EIR identifies the potential negative impacts of the gondola, the positive impacts should also be addressed. These include accessibility to the ski area from North Village, etc.

SOC-39

SOC-40

14. Mitigation Measure 4.4-1, p.4.4-11: The North Village Design Review Committee will have no authority to rule over the actual approval of the gondola use permit; in fact the Design Review Committee will not even be established by the time the gondola use permit is being reviewed for approval. In addition, while it would be nice to direct the Planning Commission to approve the Use Permit application for the gondola, there is absolutely no way that this EIR can mandate that the gondola be approved.

SOC-41

SOC-42

15. Impact 4.4-2, p.4.4-11: This impact should be better explained. Phrases like "high-rise uses" should not be used without an explanation. The area that will have "high-rise" buildings is the West Plaza, and those buildings will have a maximum average roof line of 65 feet. Other buildings that may be constructed through North Village should not be considered high rise. Without a better definition of what the NVSP is proposing to allow in terms of building heights, etc., the phrase "Development of the site with high-rise uses" could be interpreted to mean that the proponents are planning to construct a "Wall Street" district, which is not the intent of the project.

SOC-43

16. Impact 4.4-3, p.4.4-12: What is wrong with the change from a "casual small town to an orderly, planned resort"? The entire purpose of the North Village Specific Plan is to promote the planned, orderly development of Mammoth and to eliminate the haphazard development pattern of development that has already occurred in the Town. If such a change serves to promote Mammoth as a year-round recreation area, thereby boosting the tourism-based economy, then this a potentially beneficial (and significant) impact.

SOC-44

17. Mitigation Measure, 4.4-3, p.4.4-12: As previously stated.

the Phasing Plan included in the NVSP was prepared by the project proponents as an estimate of what may occur in the North Village area. There are many variables that will dictate the actual course of events. This phasing plan is not written in concrete and should not be treated as such.

SOC-45

18. Impact 4.4-4, p. 4.4-12: It is hard to believe that the local residents (or anyone else) perceive North Village as a small neighborhood convenience area. With the exception of Pioneer Market (0.9 acres), there is no other commercial facility that could be considered to be "neighborhood" oriented. The current lack of pedestrian access precludes the area from being easily used by residents. Furthermore, the NVSP is not proposing a "growing residential community". Also, the last sentence of this paragraph makes no sense. *What* "is understandable, given the fact that the 34 acres (53%) of the Specific Plan Area have already been substantially developed." If present uses will be enhanced, isn't this a beneficial impact of the project? Also, what does the phrase "fiscal changes in land ownership would result" mean?

SOC-46

SOC-47

SOC-48

19 Mitigation Measure 4.4-4, p.4.4-12: a). What does "transition of uses" mean? b). The NVSP proposes an entire list of uses that will be permitted (or permitted subject to Use Permit) once the Plan is approved. The only review that a conforming use project would be subject to is by the Design Review Committee (for compatibility with Architectural Guidelines) and by the Planning Commission (for compatibility with other development guidelines such as setbacks, parking, etc.). If the project is a conforming use to the Specific Plan and conforms with all of the development guidelines established in the Plan, then no additional decisions are necessary.

SOC-49

SOC-50

20. Impact 4.4-5, p.4.4-13: This is actually a beneficial impact, because the Town would like to see infill development.

SOC-51

21. Mitigation Measure 4.4-5, p.4.4-13: What does the discussion of the financial success of the project have to do with the opportunity to complete infill development? The relationship between the impact and mitigation measure is not clear.

SOC-52

SOC-53

22. Impacts 4.4-6, 4.4-7, and 4.4-8, p.4.4-13: These impacts are all beneficial and should be stated as such. One of the main goals of the NVSP is to generate additional tourism business in the Tow. Also, additional revenues would be generated from the project; not just \$1 million in property taxes. (See also Fiscal Impacts Section.)

SOC-54

SOC-55

SOC-56

4.5 JOBS/HOUSING RELATIONSHIP

1. Table 4.5-5, p.4.5-6: The only part of the information presented in this table that came from Mountain Environmental Group is the estimate of existing development in the Specific Plan Area. The estimates of the number of employees currently

SOC-57

working in the existing businesses in North Village were not generated by that firm. As these employee projections were based on an empirical formula used by EIP, we would prefer to not be credited with them, as we have not verified any employment figures for existing development.

SOC-58

2. Table 4.5.6, p.4.5-8: The NVSP purposely *did not* provide estimates of the amount of commercial space that may be constructed outside the Plaza, and we do not want it to appear that we anticipate construction of 250,000 square feet of commercial (including restaurant) space within the Specific Plan area. It should be made very clear that this figure is EIP's estimate, and the means by which this figure was derived should be included in the text of the EIR. This is a very important aspect of the Specific Plan, as well as the environmental analysis, and it should not be treated as if it were a definite characteristic of the NVSP, such as the gondola.

SOC-59

3. Impact 4.5.2, p. 4.5-10: a). Where did the jobs/population ratios come from? b). There is nothing in the NVSP that says that the 430 condo units cannot be used as permanent housing, although they should not be considered for use as affordable housing.

SOC-60

SOC-61

4. Mitigation Measure 4.5.2(a): This measure is unacceptable and unrealistic. The NVSP makes it clear that projects will provide housing for 100% of those employees that qualify for affordable housing (as defined by State regulations). The project should certainly not be required to provide housing for those individuals with adequate incomes to choose where they would like to live. Those employees that do not qualify for affordable housing should, conceivably, make enough money to choose the location of their residences. This mitigation measure should limit its discussion to the provision of affordable housing only.

SOC-62

4.6 UTILITIES

1. Local Water Demand, p. 4.6-4: Since this Draft was not released until December 1990 all references to specific, October, 1990 water restrictions should not be included in this document.

SOC-63

2. Mitigation Measure 4.6-2(b), p. 4.6-6: Some buildout of the project should be allowed if there is adequate water, even if no new sources have been developed. The rationale for this is that under current zoning, projects could be constructed in North Village, and that construction would not be contingent on the development of new water supplies. Also the MCWD issues water service permits on a first-come, first-serve basis, so if projects are ready to be constructed in North Village and there is adequate water, they should be allowed to be built.

SOC-64

3. Impact 4.6-4, p. 4.6-7: Is the cost of capital improvements to infrastructure included anywhere in the EIR? Which parties are responsible for the cost of new water and sewer lines and other facilities?

SOC-65

SOC-66

4. Solid Wastes: Setting, p.4.6-2: The Benton Crossing Landfill is 90 acres in size, not 40. The landfill's design life of 19 years was determined using an annual growth rate of 5% for the service area (ie. Mammoth, Crowley Lake). See "Report of Disposal Site Information for Benton Crossing Landfill", Triad Engineering, February 1989.

SOC-67

SOC-68

5. Impact 4.6-5, p.4.6-3: It is impossible to tell from the units used (cubic yards vs. pounds) what the project's relative increase is in the amount of solid waste generated in the Town of Mammoth. If the project represents a 50% increase in the total daily amount of waste produced in Mammoth, then indeed it has significant impacts on solid waste. If, on the other hand, the project represents a 1% increase in the total amount of waste produced in Town, then the impacts are not significant. Depending on this relative contribution, the project's impacts are somewhat mitigated by the fact that the existing landfill has a projected site life of 19 years (assuming a 5% growth rate), which provides the County with ample lead time in selecting a new landfill site, or expanding the old one. This fact should be mentioned in the mitigation section.

SOC-69

4.7 TRAFFIC

1. General Comment: The North Village project is entirely different from any other development in Mammoth Lakes because it emphasizes pedestrian access and mobility. As a result, the anticipated travel patterns of visitors to North Village should be significantly different than those previously documented in the Town, with a major difference lying in the number of per day vehicle trips made. It just does not seem that the traffic estimates fully credit the pedestrian orientation of the project in terms of providing a significant reduction in project generated traffic, not only in regard to trips to and from the ski area, but also trips to and from commercial facilities. It is important to consider the fact that many shops, restaurants, and bars will be available within a walking distance to North Village patrons, and many people will choose to walk to such facilities instead of driving to other ones elsewhere in Town.

SOC-70

SOC-71

2. Traffic Impact Measure of Significance, p. 4.7-15: It is certainly appropriate to discuss the limited period of occurrence of peak traffic conditions as they relate to winter Saturdays (and Holiday periods). The actual peak conditions where traffic is really a problem however, are even further limited to approximately a 2-hour window on Saturday (and Holiday periods) afternoons. The very limited nature of existing traffic congestion periods should be stressed (ie. 2 hours per day on 3-6% of the days per year.)

SOC-72

3. Table 4.7.4, NVSP Vehicular Trip Generation: These standards for daily trip rates and for peak hourly trips seem to have little relation to the assumptions made in the "Trip Generation Methodology for Town of Mammoth Lakes", as presented in the

SOC-73

Traffic Study in the Appendix. For instance, unless a significant portion of the trips listed under the hotel walk-in category are attributed to the hotel commercial, then these numbers assume that many of the people staying in the walk-in units make multiple trips *during the peak hour*. While this may be the case for other types of visitors, the actual skier behavior should be taken into account. Most do not head back out immediately upon returning from skiing. (We have included a set of trip generation figures that were calculated using many of the traffic pattern assumptions (from Kaku) provided in the Appendix of the Transtech study. A review of these calculations will show that our numbers are significantly lower than those presented by Transtech, yet many of our assumptions are supposedly the same. While we do not profess to be expert traffic consultants, we do feel that our numbers reflect a more realistic situation during peak traffic hours, given normal visitor behavior and the pedestrian orientation of the NVSP.)

SOC-74

4. Winter Saturday Trip Generation Rates, Table 4 in Appendix: The base rate used for the hotels appears to have come from a document prepared in San Diego. This rate does not seem to reflect the "all day" nature of the ski trip. While visitors in San Diego may split their days into several short activity periods (and travel to and from the hotel several times) this is not the case with skiers, who normally stop for breakfast on their way to the slopes, ski all day, return to their lodging, and travel to and from their lodging for dinner. Obviously, non-skiers may have more trips per capita, but assumptions have already been made that 75% of the visitors are skiing. It does not seem possible that the remaining non-skiers could drive the per room daily travel rate up so high, especially within the walk-in zone, where many amenities will be available to pedestrians.

SOC-75

5. Mitigation Measures, 4.7-28: a) The mitigation measures presented here which are in addition to the ones proposed by the NVSP will serve to defeat the purpose of making the North Village area more pedestrian oriented. By providing people with significantly higher capacity roads and intersections, we do nothing to discourage dependency on personal automobiles. This will have additional adverse impacts, such as increased air pollution as well as the loss of additional lands for the required road widenings. The suggested road improvements are not worth the trade offs in terms of other environmental impacts as well as in terms of improving Mammoth's image as a focused, destination resort town. This is particularly true in light of the fact that these improvements are suggested for peak periods of traffic, which occur for approximately 2 hours a day on 3-6 % of the days per year.

SOC-76

b) Some of the measures that are listed here (Old Mammoth Road improvements for instance) are clearly related more to ultimate buildout of the Town and not specifically to the North Village project. The approval of the NVSP should not be dependent on the completion of improvements on roads that are only slightly impacted by this project. Every development in Town incrementally

SOC-77

increases traffic on all Town streets, and traffic would be increased as a result of development in the North Village area even if the NVSP were not approved, and property owners developed according to existing standards. Is the level of traffic that could occur in the North Village area at buildout under the existing zoning considered? The NVSP project's relative contribution to traffic throughout Town should be considered as the net increase that the NVSP developments will have over the level of development that could occur in the project area under existing zoning.

SOC-78

SOC-79

4.8 AIR QUALITY

1. Woodburning Impacts p. 4.8-10: Although it is appropriate to assume a worst case scenario, assuming that all 2400 units developed in North Village will have woodburning stoves is an over-estimation. The Plan, as proposed, calls for the development of approximately 600 budget lodging units (ie. "Hotel 6" types). These will not be equipped with woodburning stoves. Although you may want to keep the existing worst case scenario in the discussion of impacts, a realistic reflection of the Plan is that approximately 50-60% of the total units constructed may be equipped with some kind of wood/pellet stove.

SOC-80

SOC-81

2. Construction Activities, p. 4.8-12: It should be noted in this section that construction activities and peak periods of wood burning and vehicular traffic, are by their nature, fairly mutually exclusive. Construction activities occur during warm weather months, while peak periods of wood burning and vehicular traffic occur during the winter. This characteristic in itself serves as a mitigation measure for PM₁₀ emissions.

SOC-82

2. PM₁₀ Emissions, p. 4.8-12: Is the fact that NVSP proposes significant improvements to reduce the use of personal vehicles (ie. pedestrian orientation, ski lift and ski back, and increased use of public shuttle systems) considered in the projection of PM₁₀ emissions?

SOC-83

4.9 NOISE

1. Mitigation Measure 4.9.1, p. 4.9.7: During normal precipitation and weather years, the construction season in Mammoth Lakes is very short. In order to complete major construction projects, it is necessary for construction activities to take place on Saturdays. This is critical to the timely completion of any of the project's construction phases. If construction is not allowed to occur on Saturdays, the overall time necessary to complete construction will become extended, resulting in increases of other types of environmental impacts such as visual impacts, as well as the potential for soil erosion and water quality impacts (as the period that soils would have to remain disturbed would be extended).

SOC-84

4.10 ARCHAEOLOGICAL RESOURCES

1. Mitigation Measure 4.10-1 (a-d): Measures (c) & (d) appear to have been taken directly from Jeff Burton's report, which is good, because he writes measures which address actual CEQA requirements. Measure (a) is all right, but it is included in measure (c), and is redundant as currently presented. (a) should be removed. Measure (b) is not logical [especially in light of what is recommended in measure (d)], and could be very costly if construction activities require monitoring by an archaeologist. All mitigation/data recovery should be completed prior to any kind of construction in the area; the requirement to have an archaeologist on hand to monitor construction activities is not the best way to study the resource, and could result in expensive work stoppages if a potentially significant resource is uncovered.

SOC-85

SOC-86

SOC-87

SOC-88

4.11 AESTHETICS/VISUAL IMPACTS

1. Mitigation Measure 4.11-2(a), p. 4.11-9: While it is desirable to maintain the gondola just below the tree line, we would ask that the phrase "at or near a maximum of 90 feet" be removed in order to avoid tying the gondola to a specific height, especially in areas where tree line variations warrant a different height for the gondola.

SOC-89

2. Impact 4.11-3, p. 4.11-12: Architectural guidelines have been established for the project which provide general regulations for building heights, massing, landscaping, type of construction materials, etc. The last paragraph of the discussion of this impact does not reflect the guidelines set forth in the NVSP.

SOC-90

4.13 PUBLIC SERVICES/FISCAL IMPACTS

1. Impact 4.13-1, p. 4.13-2: Snow removal in the Plaza is the responsibility of the North Village Maintenance District, and this responsibility will simply be made a condition of approval for the project. The proponents are aware of the costs and logistic concerns involved.

SOC-91

2. Mitigation Measure 4.13-2, p. 4.13-3: If these school impact fees are not yet collected in Mammoth, then this project should not be required to pay them until a program is established throughout the Town.

SOC-92

3. Fire Protection Mitigation: General Comment: Is the project required to pay a one-time fire mitigation fee and contribute to the purchase of a new aerial ladder truck? This seems to be a steep mitigation measure.

SOC-93

4. Annual Revenues, p. 4.13-9: Although this section is properly titled, it is never really stated during the discussion of im-

SOC-94

pacts that these revenues will in fact be generated annually. Also, it appears that the tax revenues are grossly underestimated.

SOC-95

5. Sales Tax, p. 4.13-11: The NVSP does not propose construction of 251,000 square feet of commercial space. Although this amount of commercial space may be constructed under the Plan, there is nothing in the Plan that actually proposes this level of construction. This would be better worded as follows: "Under the NVSP, it is possible that a total of ...commercial space could be constructed."

SOC-96

6. Table 4.13.6: Following project construction, what annual costs are incurred by some of the identified governmental offices, such as planning? It would be helpful if a brief statement of the types of costs incurred as a result of the project were identified.

SOC-97

SOC-98

7. Mammoth County Water District, p. 4.13-15: Who is responsible for the costs of general infrastructure improvements that are installed in public ROWs and service more than the North Village project?

SOC-99

6. GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

1. Last P., p.6-1: The NVSP area is identified in the Town General Plan as a resort activity node, therefore this development is in accordance with the General Plan.

SOC-100

7. ALTERNATIVES TO THE PROJECT

1. General Comment: The most likely alternative to the project is that development would occur according to the existing General Plan and Zoning Ordinance. This alternative would not result in many of the beneficial impacts anticipated from development under the Specific plan. This alternative should be examined.

SOC-101

- SOC-1 Comment noted. As described in the FEIR project description, this EIR is a *Program EIR* which is not intended to address any specific building project, but rather to describe the potential impacts associated with the overall series of projects. The purpose of a Specific Plan is to (1) implement the Town's General Plan by addressing General Plan goals, policies and objectives for a defined, limited area of the Town, and (2) provide a framework for consistent review of specific development projects over a relatively long period of time (e.g., 15 years). As the commentor notes, development regulations adopted as a part of the Specific Plan would replace existing zoning standards. However, the General Plan designation, and applicable goals, objectives and policies would still apply to the area *unless specifically amended by the new regulations in the Specific Plan which will be the new zoning for the Project area.*
- SOC-2 See Response to Comment SOC-1.
- SOC-3 See Response to Comment SOC-1.
- SOC-4 The purpose of the listing of other projects (the "cumulative projects list" or "cum list") is to establish a basis for analysis of the cumulative impacts of multiple developments in compliance with Section 15130 of the CEQA Guidelines. The usual basis for the cum list is "a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts" (CEQA Guidelines Section 15130(b)(1)(A)). The projects need not be similar in their nature nor is the list limited to just approved projects. The intent is that a discussion of reasonably foreseeable total impacts should be undertaken. For this reason, various types of projects, in various stages of approval/development are considered "equal" for the purposes of the cumulative impacts analysis.
- SOC-5 See Response to Comment SOC-4.
- SOC-6 Comment noted. Correction made.
- SOC-7 The levels of significance are listed with the appropriate impact.
- SOC-8 Comment noted. Measure 4.1-1(c) will be deleted.
- SOC-9 The sentence should read "The existing constructed slopes of the Minaret Road and Main street are angled...."
- SOC-10 The phrase "Most of" in the last paragraph of the discussion is deleted.
- SOC-11 Please see Response to Comment SOC-10.
- SOC-12 The major increase in impervious areas results from the large paved pedestrian

plaza areas between retail and commercial areas. Though this may be regarded as open pedestrian ways it will substantially increase the amount of runoff which occurs.

- SOC-13 Comment noted. Off-site retention facilities may not be available due to land shortage; however, on-site facilities then would be imperative unless excess surface runoff could be piped and captured elsewhere. These details would be determined at the time of individual project review and would be required to satisfy the Town of Mammoth Lakes Public Works Department as stated in Mitigation Measure 4.2-1(a).
- SOC-14 Comment noted. Pervious paving materials should be used "wherever feasible", as stated in Mitigation Measure 4.2-1(c).
- SOC-15 Comment noted. The mitigation measure states "...wherever feasible..."
- SOC-16 Comment noted. It is acknowledged that a large portion of the Project site is developed and that areas of prime habitat are limited. However, the loss of native vegetation resulting from the proposed Project is still considered a potentially significant impact as stated in Impact 4.3-1.
- SOC-17 Comment noted. No response required.
- SOC-18 Comment noted. No response required.
- SOC-19 Please see Section 4.11, page 4.11.1, paragraph 3 which states that existing land uses occupy approximately 50 percent of the Specific Plan area. Also, see the discussion following Impact 4.11-1.
- SOC-20 See Response to Comment SOC-16.
- SOC-21 This is a general statement. It is acknowledged that the White Mountains do not specifically surround the Mammoth Lakes area.
- SOC-22 Comment noted. Correction made by reference.
- SOC-23 Comment noted. Correction made by reference.
- SOC-24 This statement does not refer to the "distinct" identity of the area, rather, refers to it being physically separate from the other concentrations of commercial uses in the Town.
- SOC-25 Comment noted. The statement has been removed.

- SOC-26 Comment noted. The statement has been removed.
- SOC-27 Comment noted. Correction made by reference.
- SOC-28 Comment noted. The statement has been removed.
- SOC-29 Comment noted. The statement has been removed.
- SOC-30 Comment noted. The statement has been removed.
- SOC-31 Comment noted. The text shall be revised to read:
 "...(in addition to 30 condominiums). Parcels developed..."
- SOC-32 See Response to Comment SOC-31.
- SOC-33 The ratio of commercial, retail and restaurant space was based on the marketing study performed by the Project proponent.
- SOC-34 The amenities planned are based on the Project proponent's desired mix of uses the community, therefore, land use guidelines and development standards for the area.
- SOC-35 Please see Response to Comment SOC-34.
- SOC-36 While these 41 lots are owned by different individuals and agencies, the Specific Plan applies only six designations allowing for a mix of uses. It is anticipated, therefore, that following the adoption of the North Village Specific Plan, uses within the Project area will be required to be compatible with the development standards established in this Specific Plan which will be the new zoning for the Project area.
- SOC-37 Section 4.4 Land Use and Planning, page 4.4-8 is revised to read:
 "An analysis of existing land uses within the 64.1 acre North Village Specific Plan Area was completed and is included in Table 4.4-2. Currently, the largest single component of land use in the Town, is an undeveloped 25-acre piece of land that could only be developed under the existing Town General Plan and Zoning Ordinance. Under the present land use, approximately 22 acres (commercial/lodging/general = 12, Resort Commercial/Restaurant = 5, and Recreational/Quasi-Public =5) have already been developed for resort-oriented and supporting commercial uses. These are compatible with those which are proposed for the North Village Specific Plan, although there is not central focus to this existing development. Adoption of the Specific Plan would replace the current

General Plan and Zoning Ordinance, development standards with new guidelines for development. Furthermore, three acres in the Specific Plan will be kept as Permanent Open Space. The existing 14 acres currently designated as "non-resort" contain support land uses which are considered incompatible with the General Plan designation of the area.

- SOC-38 The applicant prepared an economic analysis of the North Village concept. This report suggests a specific schedule of development and a specific mix of uses to prevent market saturation from occurring. The development will be conditional to allow only the amount of retail supportable solely by NVSP.
- SOC-39 See Response to Comment SOC-40.
- SOC-40 While construction of the Gondola contributes significantly to the development of this area, adding accessibility to the ski area from North Village, there is an outstanding issue of land use compatibility and privacy associated with the Gondola due to its proximity to neighboring residences. Even though air right easements have been obtained, certain right-of-way issues remain.
- SOC-41 The implementation of the gondola will most likely proceed upon approval of the NVSP. However, as the Mitigation Measure 4.4-1 indicates, its "impact will still be significant and unavoidable".
- SOC-42 The EIR is not mandating that the gondola be approved. On the contrary, it is indicating that the gondola is considered a significant visual impact on the residential uses but still a mitigating factor toward traffic impacts.
- SOC-43 Development of the site designates a maximum height for a full-service hotel in the West Plaza at 100 feet from natural grade or plaza level 7 with a maximum average building height of 65 feet.
- SOC-44 The intent to accelerate and commit to the development of this area according to a comprehensive plan would create a more intensive, impacting commercial district. Given the location of North Village is in conformance with the General Plan a Town Activity Node, and the General Plan anticipates the eventual build-out of the North Village Area at maximum densities, the purpose of the North Village Specific Plan is to promote the planned, orderly development of Mammoth Lakes and to eliminate the potential for haphazard development.
- SOC-45 It is acknowledged that the phasing plan will be subject to change and that the phasing of individual projects will be approved by the Town of Mammoth Lakes Planning Commission.
- SOC-46 Please see Response to Comment SOC-44.

- SOC-47 The North Village Specific Plan is proposing Land Use Guidelines for a planned community as indicated in the General Plan and Zoning Ordinance. The result will be a planned growth of the residential community as well as commercial and tourist-oriented uses.
- SOC-48 Comment noted. The acreage of substantially developed land in the Specific Plan Area is 36 acres out of 64 acres or 56 percent.
- "...fiscal changes in land ownership..." signifies change in the value of land, higher sale value, stimulating sales.
- SOC-49 Transition of uses involves the re-zoning of parcels from one land use to another (see Specific Plan, Table 7, Land Use Matrix). See Response to Comment SOC-50.
- SOC-50 Once the NVSP is approved, prior to every development phase of the proposed Project, the plan for that proposed phase shall be submitted to the Town of Mammoth Lakes, North Village Design Review Committee (for compatibility with Architectural Guidelines) and the Planning Commission (for compatibility with other development guidelines such as setbacks, parking, etc.).
- SOC-51 That is correct. Infill is generally seen as a beneficial impact, therefore this is not a significant impact on the project.
- SOC-52 Comment noted. The text on page 4.4-5, page 4.4-13 should read:
- "The success of the infill of North Village and the ultimate prosperity of the village is dependent on several factors....."
- SOC-53 Please see Response to Comment SOC-52.
- SOC-54 All the impacts are beneficial to the Town, therefore, they are not a significant impact on the project.
- SOC-55 The Project will generate additional tourism business - a General Plan goal. The Plan is expected to capture the potential for the ski-market demand by improving the amenities of the resort.
- SOC-56 Beneficial impacts associated with the increase of visitors to the Town are addressed in the Fiscal Section of the EIR. (Please see Impact 4.13-6). Beneficial impacts are presented in terms of increased occupancy tax and sales tax revenues to the Town of Mammoth Lakes. In addition, the proposed Project would contribute to the Town revenues through the increase of property tax.

- SOC-57 Comment noted. Table 4.5-5 of the EIR should include a note indicating that Mountain Environmental Group provided only the estimate of existing development in the Specific Plan Area.
- SOC-58 Comment noted. Please refer to Response to Comment SOC-57.
- SOC-59 The estimated 250,000 square feet of commercial space is the potential amount of development for both the Plaza area and surrounding area (outside the Plaza area). The total estimate of commercial space was developed by EIP based on assumptions of current commercial floor area to hotel unit ratio on the site. The final land uses may be less intense as determined by the Specific Plan approval process.
- SOC-60 The 57 jobs-to-population represents the Town's existing ratio based on the State of Department of Finance and the Employment Development Department.
- SOC-61 Comment noted. Portions of the condominium units could potentially be used as permanent housing units, thus increasing the permanent population of the area and associated impacts.
- SOC-62 Comment noted.
- SOC-63 At this time, MCWD is preparing new water restrictions. The Level 4 Water Restrictions, effective October 1990, are the most recent available.
- SOC-64 Whether partial build-out is allowed is subject to the availability of water as determined by the MCWD at the time of construction. The Town will require evidence that MCWD can serve the Project before issuing permits.
- SOC-65 Comment noted. The cost of capital improvements to infrastructure is not included in the EIR. However, one time revenues generated by sewer hook-up fees help to pick up the cost of these infrastructural improvements. Sewer and water line hook-up fees shall be borne by the developer.
- SOC-66 See Response to Comment SOC-65 and MLB-14.
- SOC-67 The traffic generation characteristics of the North Village project are similar to those of Lodestar, Snowcreek and Juniper Ridge which contain a mixture of lodging and commercial uses. North Village and Lodestar also have in common a ski lift facility connecting the project to a MMSA. The effects of the pedestrian orientation of the Project, including the availability of commercial facilities within the projects, were considered in the development of the trip generation rates.
- SOC-68 Comment noted.

- SOC-69 See Response to Comment MLB-17.
- SOC-70 (a) The base trip generation rates used are from the IITE Trip Generation Informational Report and the San Diego Traffic Generators. Both documents are widely accepted in the traffic engineering field as appropriate trip generation sources. The rates were adjusted to reflect generation characteristics specifically applicable to the Mammoth area. However, further adjustments to reduce vehicular generation cannot be substantiated and would not be in keeping with CEQA guidelines.
- (b) The traffic projections presented in the letter are based on certain unsubstantiated assumptions which were not used for the EIR traffic analysis. One assumption is an occupancy of 1.9 persons per hotel/motel room versus 2.65 persons per room used in the EIR. Another is the assumption of a vehicle occupancy of 2.5 persons for non-ski trips. This high occupancy has not been substantiated in traffic occupancy studies.
- SOC-71 See Response to Comment SOC-70(a).
- SOC-72 See Response to Comment RLM-48.
- SOC-73 The EIR traffic analysis examined total cumulative impacts from the NVSP and other identified future developments and the required mitigation. Examining the incremental traffic increase from the NVSP versus build-out of the area under current General Plan designations would not be consistent with CEQA since it would not present an accurate scenario of future traffic conditions which require mitigation. Even if the NVSP was not developed, the impacts from build-out of the area under existing designations would have been mitigated.
- SOC-74 See Response to Comment SOC-36.
- SOC-75 See Response to Comment SOC-70.
- SOC-76 See Response to Comment RLM-48
- SOC-77 See Response to Comment SOC-73.
- SOC-78 See Response to Comment SOC-73
- SOC-79 See Response to Comment SOC-73
- SOC-80 The following paragraph will be added to the impact description.

"However it must be noted that only 50 to 60 percent of hotels will have

woodstoves. The realistic PM₁₀ emissions from woodstoves would be 11.64 Mg and 221.4 Mg respectively."

- SOC-81 Please see Response to Comment SOC-80.
- SOC-82 The construction and woodburning emissions are mutually exclusive but the cumulative effect is still the same for annual production.
- SOC-83 Yes. Please refer to Response to Comment GBUAPCD-1 and Mitigation Measure 2.8-4.
- SOC-84 Mitigation Measure 4.9.1(a) extends the work days to Sundays.
- SOC-85 Mitigation Measures 4.1-10-(a) & (b) in the original document has been deleted and Mitigation Measures 4.10-1 (c) & (d) has been renamed 4.10-1(a) & (b) respectively.
- SOC-86 See Response to Comment SOC-85.
- SOC-87 See Response to Comment SOC-85.
- SOC-88 See Response to Comment SOC-85.
- SOC-89 Mitigation Measure 4.11-2(a) has been changed to read:

"The height of the proposed gondola should be maintained just below the tree line, in order to protect views from adjacent residential buildings."
- SOC-90 Architectural guidelines do exist for the North Village Specific Plan area, however, they do not constitute mitigation measures. The mitigation measures provided are in addition to, or consistent with, the guidelines established for North Village, are intended to ensure high quality development that will minimize any negative visual effect that may result from the proposed project.
- SOC-91 Comment noted. No response required.
- SOC-92 Please see Response to Comment MUSD-3.
- SOC-93 Mitigation Measures 4.13-4(b) and 4.13-4(l) have been requested by the Mammoth Lakes Fire Protection District.
- SOC-94 Revenues represent annual figures.

- SOC-95 Comment noted. No response is required.
- SOC-96 Comment noted.
- "Under the NVSP, there is a potential of 251,000 square feet of commercial space that could be constructed" shall be part of the EIR.
- SOC-97 Costs are presented on an annual basis, therefore, the table also represents costs after construction. The costs are based on a per capita basis, thus, an increase in population would increase costs for the Town.
- SOC-98 A list of the type of costs within each governmental department is presented in the 198901990 Town of Mammoth Lakes budget.
- SOC-99 Please refer to Reponse to Comment MLM-14.
- SOC-100 See Response to Comment SOC-1
- SOC-101 Applicable provisions of the Town's General Plan are discussed in Section 4.4 of the EIR. The General Plan provides land use designations for the property, which are carried out through regulations set forth in the Zoning Ordinance. *On paper*, the General Plan and Zoning Ordinance appear to allow very intensive development of the entire Specific Plan area. However, the fact that the area is fully subdivided and owned by a large number of different individual owners would make achievement of this intensive level of development very unlikely. Rather, zoning restrictions such as setbacks for individual lots and parking requirements would substantially reduce site design efficiency. For this reason, the "existing General Plan" buildout scenario would likely be similar in scope to the "reduced project alternative" discussed in the EIR.

TG

Comments to the Board re North Village EIR

My overall concern is that this environmental review satisfies the ~~minimum~~ review requirement for anything and everything ^{conceptually deemed to be} built in the proposed SP area over the 15 year period development. As stated in the DEIR, the ~~main~~ ~~purpose~~ ~~of~~ ~~a~~ ~~specific~~ ~~plan~~ is to provide the Project with the ability for more flexible site designs (height) and to enable continuity of pedestrian circulation (closure of Canyons). Obviously the Town's General Plan allows for all of the proposed uses and provides a street system for that would have been adequate. And, presumably, the Town's G.P. received environmental clearance. So, if the SP and amendments to the G.P. provide the opportunity for additional environmental review, that's how we get it. The most polarizing statement found in the DEIR pertains to the aesthetic effect impact of 100 foot high hotels, nearly equal the 120 foot existing front canopy. After reciting "the law" that (visual) impacts are considered potentially significant when they have a substantial, demonstrative negative aesthetic impact, the drafters say since there is no quantitative method for assessing visual and aesthetic impacts and ^{the} a determination of significance is subjective, we will provide NO INFORMATION REGARDING THE PROPOSED PROJECT AS SET IN THE EXISTING AND SURROUNDING ENVIRONMENT. But to cover ourselves we'll say

"... all identified impacts are considered to be significant adverse impacts, and corresponding mitigation measures ^{will} ~~would~~ be (deemed) sufficient to reduce impacts to a less than significant level"

AND

because we know this is perhaps the area of greatest concern and sensitivity, we're going to overstate mitigation measures ^{to} ~~of~~ less than significant impacts which "the law" doesn't even require", even though we just said that ANY impact was significant.

The real outrage for me is the ^{treatment of the very} ~~issue~~ ~~by~~ which I was told I should participate

in the North Village Plan. Just after moving into our home on upper Forest Trail a neighbor alerted me to the proposal to close Canyon in order to place a grade station in the middle of the existing street, and route all of that street's traffic to Forest Trail. It's slightly difficult for me to fathom, but this major re-routing is considered by the developers as a given, so much so that ^{with proposed} mitigation measures or physical improvements to increase capacity and achieve acceptable operating conditions, they simply say

"... these series of improvements would be in addition to the roadway improvements either currently programmed by the Town or those proposed as part of the North Village Specific Plan."

TG-2

Curiously the developers provide the greatest detail, regarding any traffic issue in the DEIR, in their discussion of how inadequate Canyon is, but barely explain why Forest Trail is better and certainly don't reveal that Forest Trail, now a local, residential collector street ^{is proposed to} ~~will~~ become a collector or arterial. In fact, it's interesting to me that Canyon ^{is currently} designated a collector but ^{actually} serves as an arterial to the Warming Hut.

It late summer, I sought out one of the developers, and in my discussion with him felt him very sincere in wanting to put together a comprehensive, ^{proactive} visitor oriented, visitor attraction development, that would also serve as impetus for further "destination-resort" development. Ostensibly, in pursuing the best interests of Mammoth, he believes the project should not have adverse environmental consequences, and he retained a private consultant to help solicit additional input.

While theoretically, public comment should receive due consideration, I'm dismayed to see a prudent, professionally prepared that ignores the implications of moving all of Canyon's vehicle trips to my street, Forest Trail nor addresses how I will make a left turn across that traffic as compared ^{to} now making a simple right turn! And, I can presently enjoy a front view which includes the sitting of the late May craft fair but should this DEIR be approved, it is suggested in one breath that

TG-3

"the project shall preserve existing vegetation"
 but then turn right around and state that the site will be CLEAR CUT!
 "development planned ... would result in ... elimination of most
 of the native vegetation and wildlife ... proximately to the project"

As I hope, this environmental clearance will sanction all development projects
 in the plan area. This is it! But, the most rudimentary information is not provided us,
 "Site plan available at this time do not specifically note which trees
 and other vegetation would be removed but it can be assumed from the
 intensity of the proposed development that most would be removed."

Naturally, lacking detailed, specific information on most issues throughout the DEIR,
 the drafter recommend as mitigation, that at the time individual projects are built
 that detailed study be conducted and plan to address the particular issue be
 prepared and made a condition of project permitting. An adequate environmental
 review cannot legally pass muster by relying upon future study or promising that
 mitigation plan will be prepared.

I'm sure the drafter, having just prepared a EIR for the adjoining Lockheed
 project, brought a wealth of background and knowledge to the N.V. EIR, I should hope
 they haven't just put a new cover on the earlier EIR and added boilerplate
 mitigations equally applicable elsewhere. But, survey data precede the
 letting of the contract for the EIR; traffic data was generated for Lockheed, not N.V.,
 and the data ^{and some} is not part of documents provided; and the proposed mitigation are not
 detailed and site specific but rather good text book jargon.

TG-4

Notes:

Biological Resources

re conifers, there is no indication of aesthetic and psychological value to humans. It's no accident that the very popular Lake Agassiz Park is set in a "contiguous fir forest" of which the drafters say there is little in the project area. So this area with preserving or at least with more carefully assessing. No mention is made of the relationship of to trees or loss of trees in adjoining (residential) development and what effort should be made to reestablish the trees.

TG-5

Nothing is said of the maturity of the Red and White Firs, how long it took them to grow, their health, life expectancy and how long it would take for replacements to even approach the size of existing trees. It seems no one replaces with these firs because they are so slow growing, BUT THEY ARE THE NATIVES.

TG-6

What is the oxygen producing capability of the trees to be removed and what adverse impact will result.

Since a recommendation is to preserve existing, notwithstanding the intent to clear cut that specific safeguards are taken to protect trees, like fences. Every development I've seen, "sound" trees are hit by equipment and roots disrupted, even after construction e.g. installing railroad ties

TG-7

Aesthetic/Visual Impacts

The site contains NO UNIQUE VISUAL FEATURES. Nor does Von's parking lot. The NV site merely has a front canopy of 120 feet. This of course has nothing to do with the alpine character. They'll be able to restore alpine character with 150' "chalets". Later in the section one sentence recognizes that

"existing development is enhanced by the background provided by the forested areas of the site" and

"existing development of low-rise buildings affords long range view corridors, particularly significant due to the high level of vehicular traffic along project roadways"

TG-8

But; not to worry, the best best mitigations will show that
 "the proposed project should (to the maximum extent feasible) retain
 forested areas, and remain subordinate to the natural
 character of the site and the surrounding landscape."

Croak! That extent is gone since the site will be clear cut, most of the
 open space developed and existing bldg heights and current limits substantially
 exceeded. And, not a single proposed building elevation is provided and
 especially not set in the existing site. Whatever the impact, it will be mitigated by
 "following the architectural guidelines of the N.V.S.P."

I thought the purpose of the DEIR was to evaluate the S.P. which would necessarily
 include assessing the impacts of the mitigation measures themselves. How does
 the public "know" that those guidelines are adequate? And, we have to sit back
 and rely on, in the future, on the NV Design Review Committee?

Really, the result of impact as suggested by the need to

"create a buffer (of trees and landscaping) that would protect
 privacy and minimize visual impacts on affected, adjacent
 residential properties."

No mention or made of the off. site impact of the gondola mid-station at
 the pit on upper-most Forest Trail!

Traffic

Whole study seems based on ADT with only passing reference to AM & PM peak hour
 demand. Reference on road to

"unique top making characteristics associated with ski resorts &
 resort lodging developments"

which would point to the need for peak hour analysis, which would show the impact
 through the road, so the drafters counter this point with two others

"standard capacities are inherently conservative and are
 further reduced to smaller values affected of inclement weather"

and

"Circulation systems should be designed to accommodate traffic conditions on average day, thus achieving desirable LOS under average conditions more appropriate than designing for peak periods. There is NO FAILURE of the system. Acceptance of lower LOS is balanced by reduced costs, secondary (environmental) impacts, and generally the cost/benefit ratio for worst case is not well understood."

A great example is the behavior ~~at~~ 203rd and Town. Not only if signature overkill but literally a killer of wildlife and aesthetics (removal of trees). Also, the Town's existing three signals impede traffic 95% of the time and are only essential to ^{inf} drive right of way 5% of the time.

But, the drafters go on to make other ^{incidental} statements:

"interesting to note that ESTIMATED existing traffic volume at two unsignalized intersections operate at poor LOS's and are sufficiently heavy to satisfy traffic signal warrants which would improve conditions to acceptable levels"

Though it would seem focus of concern would be morning, the huge volume of side traffic during periods of short duration as well as of 20 days/year the drafters acknowledge

"it should be recognized that poor operating conditions reflect conditions only for stop controlled vehicles waiting to turn from side streets onto a major and this does not represent conditions for intersection as a whole; traffic on major, for most part is unrestricted and free-flowing."

So, how are signals still recommended and how will their phasing affect the now free-flowing major streets.

The most significant & egregiously perpetuated is the suggestion that the proposed circulation plan will

"reroute skier traffic from Hut II to Lake Mary Road to
relieve congestion at the Forest Trail - Monument intersection
and avoid traffic from the Main Lodge & Hut II & meet at
'entitled conditions' at Lake Mary - Main St. and Monument intersection"

but the briefers go on to say

"there will continue to be two primary points of access to the
Hut II and both will be able to accommodate higher levels of
traffic"

However this reduces Forest Tr - Monument LOS to D, allowing Lake Mary -
Lakeman to operate at A, and of course Main St. Monument remains at F.
To me it soon clear that the Hut traffic should be totally routed to
Lake Mary to split the traffic and keep the through traffic out of the
single family slopes. At the critical intersection of Main/Lake Mary -
Monument traffic - the PM from the ski areas should be free flowing by
desynchronization. Obviously some creativity is needed.

With respect to transportation demand management there is no assessment of the
shuttle's current value or a ^{specific} proposal as to how its use can be encouraged. One suggestion
suggests odd hours, increased frequency, extended operating hours, expanded coverage. That's it!

Parking is only discussed inasmuch as more will be provided for skiers; how much
is needed and how much provided. Parking ^{issues} seems to be deferred to the final
application of individual projects

TG-12

One shuttle suggests to drop off skiers at NV or WH II, etc. After all, the
proposed gondola has a 2,500/hour capacity.

TG-13

How useful is ski board trail if skiers have to walk from marshalling area
back to the gondola. Here is map of trail. What about Hut II ski board trail.
Why not build a bridge over Forest Trail,

TG-14

Air quality

issue is emerging number message; bottom line is that Project will contribute 44% of all PM₁₀ emissions in year 2005. The main problem is reducing re-entrainment of cinders is reducing traffic. However, this project will add 61,000 VMT even though the Town air quality plan goal is to add a total of only 40,320 VMT. The drafters have no answer! They hope other mitigation works

TG-15

Jobs/Housing

The Project will create jobs, 2/3 low paying. These jobs will create an increase in Town permanent population by 30% or 2,823. Of the 1,230 units of housing required 800 should be on-site, low to moderate income. But, they're not. It's suggested that they in fact will be off site, with an in-lieu fee or "equivalent program."

TG-16

Utilities

- Water - reference is made to ~~being~~ consuming 200,000 gallons per day. They talk about the distribution system BUT NOT WHERE IT'S COMING FROM!
- Waste - reference is made to sewerage in the amount of 459,100 gallons per day. THAT'S DOUBLE THE WATER CONSUMED - HOW'S THAT HAPPEN. And, any amount day.

TG-17

- " Since MCD has adequate capacity for Project generated flows"
- Solid Waste - 35,340 pounds additional per day is day since
- " Merrill Disposal Co indicates it has adequate collector facilities to serve the project and Baxter has another 19 years capacity."

TG-18

The drafters suggests it would be nice if in the future the project would look at source reduction and recycling

Also discussed without facts or discussion since utilities have infrastructure in place to sell their product is

- electricity - 20,415,200 kWh/year
- telephone - 2,700 phone lines

TG-19

Public Services

• Snow removal

- THREE MILES of pedestrian walking to be cleared - that's mind boggling and its not discussed in this section
- The amount of snow storage required is not discussed; haul routes for transporting and energy consumption, snow (type), equipment not discussed
- Mention much of Town and Cal Trans participation, what about MUSA?

TG-20

TG-21

TG-22

• schools

an UNAVOIDABLE IMPACT of 373 students and the project ought to take care of buses!

TG-23

• police

a call increase of 30% and on foot is a substantial impact to a district

TG-24

• fire

THESE MITIGATIONS HAVE THE GREATEST IMPACT OF ANY MITIGATION and must be reconsidered. That is, 20 FOOT, HARD, ALL-WEATHER SURFACES is ENVIRONMENTALLY OUT OF TOUCH and TOTALLY INCONSISTENT with landscaping mitigations?!

TG-25

Here they also suggest that emergency access to the residential neighborhoods behind the project will be a problem with the closure of Canyon and that a special easement is needed to allow access. What's this exactly all about?

Meeting required fire flow is gallons per minute is set forth, but under utilities flow is no discussion of MWD infrastructure capability.

TG-26

Rad. bridge which should have roofs to lower obstruction, must be "high enough" for fire equipment.

Lighting.

The aesthetic impact of the energy mitigation to use high pressure sodium lighting is not addressed. There's nothing less material, no matter what they say about the source of light's ability to reflect time clocks!

TG-27

FROM: CAO

TO: 818 568 1561

FEB 22, 1991 3:24PM #495 P.09

Hydrology

- off site retention of storm runoff as suggested. Where is the catch, what's the size of the facility
- low water using plants as suggested; is this consistent with natural landscaping?
- minimizing runoff with the use of porous paving material is inconsistent with fire access road hard surface requirement

TG-28

TG-29

TG-30

FEB 22 '91 15:22

CAO

PAGE.009

- TG-1 Comment noted.
- TG-2 See Response to Comment RLM-3, RLM-15, and RLM-7.
- TG-3 The rerouting of Canyon Boulevard and proposed realignments will result in local changes in circulation that are not considered a significant adverse impact in light of other mitigations such as Lakeview/Lake Mary improvements.
- TG-4 Comment noted. No response is required.
- TG-5 Please see Section 4.11-1 Impact 4.11-1 and the following discussion and mitigation measures.
- TG-6 While humans tend to prefer large, old trees for either visual or psychological reasons, it must be remembered that these are the trees that are the nearest to the end of their life cycle, the nearest to death. Under ideal conditions, there would be a mix of trees from saplings to larger trees and this is the goal behind Mitigation Measures 4.3-1(a) to 4.3-1(f) of the revised EIR. The loss of trees on the site would not have a significant effect on the available oxygen of the region.
- TG-7 Comment noted. See revised EIR.
- TG-8 Comment noted. Please see page 4.11-8, Impact 4.11-1. The discussion there following states that Project construction would result in a loss of open space and forest, which would be considered a significant visual impact. Also, please see Mitigation Measure 4.11-1(b), which requires the Project applicant to submit a tree protection and replacement plan.
- TG-9 Mitigation Measure 4.11(d) has been changed to read:

"In order to reduce visual impacts, a forested buffer averaging no less than 100 feet shall be retained along Lake Mary Road, and along the western and eastern edges of the Project site. Special buffering and height restrictions shall be provided adjacent to existing residential areas and to the hotel that is proposed for development across Forest Trail from the Town's community center".
- TG-10 The Traffic and Circulation section of the EIR evaluates both Average Daily Traffic (ADT) and PM peak conditions.
- TG-11 Before traffic signals are recommended, the benefit of assigning right-of-way to cross traffic is weighed against the interruption of traffic on the more heavily traveled street and the distance between signalized intersections. Traffic signals are only recommended where overall benefits can be shown.

The opinion that traffic measures that encourage the use of Lake Mary Road, Lakeview Boulevard to access Warming Hut II and a traffic management plan for handling peak hour traffic at the Main Street/Minaret Road intersection are noted and concurred with.

It is expected that skier vehicular traffic to Warming Hut II will be distributed to both the Forest Trail/Minaret Road and Lakeview Boulevard/Lake Mary Road travel routes but concentrated on the Lakeview/Lake Mary route.

- TG-12 See Response to Comment RLM-21.
- TG-13 The specifics of the transit/shuttle expansion have not yet been identified. However, shuttles can be expected to serve both North Village and Warming Hut II.
- TG-14 The marshalling area proposed for the northeast corner of SR 203 and Forest Trail will be served by shuttles. Skiers will also be able to use the pedestrian facilities to return to the gondola. The specific alignment of the ski back trail is not provided in the NVSP and is subject to USFS environmental assessment and approval.
- TG-15 Comment noted.
- TG-16 Mitigation Measure 4.5-2(a) states that a hundred percent of the employee generated housing shall be provided on-site, including affordable employee housing. This is based on H&S Code 50070.5 and 50105 criteria. However, only with the approval of Town Council can a portion of the housing need be located off-site.
- TG-17 Please see Response to Comment MCWD-3 and MCWD-12.
- TG-18 Please see Response to Comment MCWD-4, MLB-23 and 24.
- TG-19 Since portions of the Project site are already developed, it is assumed that the Project will connect to the existing infrastructure. However, if existing facilities have to be expanded to serve the site, the future development will be required to pay a proportional amount as determined by the serving utilities.
- TG-20 Snow removal along the pedestrian walkways is the responsibility of the North Village Maintenance District.
- TG-21 Please see Mitigation Measure 4.13-1(a&b).

- TG-22 Please see the discussion of Snow Removal on page 4.13-1 of the Public Services/Fiscal Section in the Revised Draft EIR.
- TG-23 Please see Response to Comment SOC-92 and MUSD-2.
- TG-24 Comment noted. No response required.
- TG-25 Mitigation Measure 4.13-4(a) is a requirement of the Mammoth Lakes Fire Protection District.
- TG-26 Please see Response to Comment RLM-7.
- TG-27 Comment noted.
- TG-28 Design details of off-site retention facilities and other drainage improvements are not yet available. The drainage improvements would be subject to approval of the Town of Public Works Department as stated in Mitigation Measure 4.2-1(a).
- TG-29 "Native species" could be substituted for "low water using" plants. The significance being to avoid use of exotic species which require excessive amounts of water as characterized by species from tropical rather than a temperate climate with particular long dry summers.
- TG-30 Pervious paving materials would be used on plaza or pedestrian areas rather than access roadways and therefore would not affect fire access.

OFFICE OF THE COUNTY COUNSEL
MONO COUNTY

COURTHOUSE ANNEX II
BRIDGEPORT CALIFORNIA 93517

TELEPHONE: (619) 932-7911

MAILING ADDRESS: POST OFFICE BOX 497

JAMES S. REED
County Counsel

NEIL G. MCCARROLL
Assistant County Counsel

FACSIMILE: (619) 932-7620

TELEPHONE: (619) 932-7911

FACSIMILE TRANSMITTAL SHEET

DATE : 3/26/91

NO. OF PAGES
INCLUDING THIS SHEET: _____

TO : Peter Tracy and Randy Mellinger

FAX NO. : 934-8608

FROM : James S. Reed

RE : _____

COMMENT : PLEASE PROVIDE A COPY OF THIS LETTER AND ATTACHMENTS TO MR. TRACY

TO RANDY MELLINGER, PLANNING DIRECTOR

OFFICE OF THE COUNTY COUNSEL
MONO COUNTYCOURTHOUSE ANNEX #
BRIDGEPORT CALIFORNIA 93517JAMES S. REED
County CounselNEIL G. McCARROLL
Assistant County CounselTELEPHONE: (619) 932-7911
FAX: (619) 932-7145

MAILING ADDRESS: POST OFFICE BOX 497

March 26, 1991

SENT VIA VAX 934-8608/
872-2781Peter E. Tracey
Town Attorney
Town of Mammoth Lakes
P.O. 1609
Mammoth Lakes, CA 93546

Re: North Village Final EIR

Dear Peter:

Some county staff people have expressed a concern to me which I feel necessary to bring to your attention. Dating back to May of 1989, Mono County has submitted comments on the proposed environmental impact report for the North Village Specific Plan. None of the comments have been addressed in the Final EIR, which is scheduled for consideration by the Town Planning Commission on March 27, 1991.

Section 15088 of the CEQA Guidelines requires that the lead agency evaluate and prepare written responses to comments received during the comment period. Otherwise the document will be inadequate as a matter of law.

It seems to me that Town staff, the EIR preparer and the project proponents would want to be aware of this issue before further action is taken. Comments by the County are attached.

Yours very truly,

JAMES S. REED,
County CounselJSR:shs
Encl.cc: Scott Burns
Randy Mellinger

MONO COUNTY PLANNING DEPARTMENT

HCR 79 BOX 221
MAMMOTH LAKES, CA. 93546
619-934-7504

P.O. BOX 8
BRIDGEPORT, CA. 93517
619-932-7911 Ext. 217

February 6, 1991

Randy Mellinger
Town Planning Director
P.O. Box 1809
Mammoth Lakes, CA 93546

RE: NORTH VILLAGE SPECIFIC PLAN AND DEIR

Dear Randy,

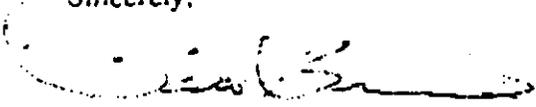
Thank you for granting our request to extend the public review period on the North Village DEIR. As you know from previous correspondence from our Chairman Dan Parantick and our previous County Administrative Officer Glenn Thompson, a primary concern with the North Village project and the DEIR is the potential impact the development could have on the County's fiscal health, particularly the impacts that could result from the use of a redevelopment agency for the project.

Town Manager Glenn Thompson has recently indicated to County representatives that the Town does not intend to use the redevelopment process for the development of North Village. With this understanding, we request that either a mitigation measure in the DEIR, or a policy in the Specific Plan be included stating that redevelopment financing shall not be used for the North Village project.

With such a policy/mitigation measure, together with the assurances given by the Town Manager, the County Planning Department has no further comments on the project.

Thank you for your consideration of these additional comments. Your cooperation in this matter is appreciated. Please give me a call if you have questions concerning our comments.

Sincerely,



Scott Burns
Planning Director

cc Bill Mayer, CAO
Board of Supervisors
Jim Reed, County Counsel

JAN. 15 COMMENTS

Mono County
Comments on DEIR for North Village

A GENERAL COMMENTS

As we noted in our comments of May, 1989, the DEIR should address the impacts associated with the use of a redevelopment agency to fund the project. Town officials continue to indicate publicly that the formation of a redevelopment agency is contemplated for the project area. A redevelopment agency would create significant impacts for the County and for the Special Districts which now receive property tax revenues from the project area. These impacts, which are certainly foreseeable in light of those statements of various Town officials, should be discussed and appropriate mitigation should be proposed in the DEIR.

In addition, the Specific Plan continues to be inadequate in its discussion of financing mechanisms for implementing the project. As noted in our comments of May, 1989, Government Code Section 65451 (a)(4) requires a Specific Plan to include "a program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out [the project]."

The Specific Plan contains a one page discussion entitled Project Implementation and Financing (p. 26). This section does not discuss any financing options for infrastructure improvements or project development other than alluding to the use of a redevelopment agency by stating that:

In order to ensure implementation of the necessary infrastructure improvements, the North Village Group must seek financial and regulatory assistance from outside sources, such as public entities.

The law requires a Specific Plan to discuss all financing options, including the possible use of a redevelopment agency; the DEIR should discuss such financing options to the extent that their implementation could have significant impacts on the environment. We continue to question how the DEIR can be adequate when the project it describes is not adequately described as required by law.

As a final general comment, many of the mitigation measures throughout the document use the word "should" and, as a result, have no force and no possibility of enforcement. The entire document could be strengthened by changing the wording in

many cases to "shall." Recent case law [see Sundstrom Infral] casts considerable doubt on devising mitigation measures in such discretionary (and unenforceable) terms.

B. CUMULATIVE IMPACTS ANALYSIS

The cumulative impacts analysis on p. 5-1 continues to be inadequate. On p. 3-2, the DEIR has a list of "Related Projects"; however, the DEIR fails to discuss the cumulative impacts associated with those projects. As an example, on p. 5-2, the DEIR states that:

The general increase in energy and water consumption for construction and human habitation could place additional pressure on existing resources. In particular, additional water sources may need to be developed (emphasis added).

There is no discussion of the water requirements of each project, nor of what would happen if each of those projects developed at the same time. Not only is this legally inadequate; given our current water supply situation, it is irresponsible. The cumulative impacts of other development projects are discussed further on p. 4.6-6 in Impact 4.6-2 and its associated mitigation measures. The Impact states that:

The cumulative impact of buildout under the Mammoth Lakes General Plan will require the prompt development of the Dry Creek wells and other sources as developed by MCWD. This is a potentially significant impact.

Mitigation Measure 4.6-2(b) states that:

In the event that additional supplies are not developed in a timely fashion, development shall be deferred pending availability of adequate water as determined by MCWD.

This is not an adequate approach to the issue of the cumulative impacts of proposed development on the local water supply. Instead of deferring the determination of whether the water will be available for development, this EIR should evaluate those cumulative impacts and should either define appropriate mitigation measures to address those impacts or recognize that

it is an unavoidable significant impact. Other potential cumulative impacts should be evaluated in the same manner. Moreover, we suggest that the term "timely fashion" is ambiguous. Does it mean this project will go forward without finding additional water sources, but others will be deferred? Is it legal or proper to leave the hard decision to another agency?

As noted in our comments of May, 1989, CEQA Guidelines Section 15130 (b) requires the following for an adequate discussion of cumulative impacts:

- (2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- (3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project.

The DEIR contains only a cursory analysis of cumulative impacts and does not address either of these requirements. In addition, there is no discussion of the cumulative impacts of the following: housing, especially the need for affordable employee housing, and the increased demand for public services.

C. FISCAL IMPACTS ANALYSIS

The discussion of public services and fiscal impacts is incomplete. The Section on public services does not discuss hospital and emergency medical services. Although the fiscal impacts section notes that the hospital has enough beds to meet the demands of the project, paramedic services are not mentioned.

In Impact 4.5.2, the DEIR states that employment generated by the project could "increase the population of the Town of Mammoth Lakes and its surrounding area by as much as 2,828 people". On p. 4.13-7, the DEIR makes the assumption that 80 percent of those people will reside in Mammoth Lakes and the remaining 20 percent will "commute from communities such as Crowley/Hilton, June Lake, Bridgeport, Lee Vining and Bishop". An increase of almost 30 percent in the total current county population, especially when 20 percent of that increase is expected to reside outside the Town, will create a significant

impact on County services including: library, health, legal and court, welfare, mental health, assessors, auditors, tax collectors, paramedic, landfills, and airport. The County has previously submitted comments on the project's potential impacts to many of these services; this information and accompanying analysis must be included in the document, and a response given in the Final EIR, as a matter of law.

The DEIR also notes that by the time the higher-priced more luxurious hotels are built, "air service must be well established" (p. 4.4-10), yet there is no discussion in the public services/fiscal impacts section of the impacts of expanding the airport to provide that service. [Airport expansion, is by this admission, a known cumulative impact which has not been discussed.]

In light of these potential impacts, the DEIR's analysis of the potential fiscal impacts to the County is wholly inadequate; the impact identified does not relate to the previous discussion concerning fiscal impacts to the County. On p. 4.13-16, the DEIR states that an increase of 2,800 people in the County would result in a deficit of about \$2.86 million for the County. Either measures must be proposed to mitigate this impact or it must be recognized as a significant unavoidable impact as a matter of law. Instead, the impact associated with this analysis states that the Specific Plan will have a positive and beneficial impact on the Town's budget and makes no mention of the impacts on the County. This alone renders the document inadequate.

This section should also address the additional impact to the County that could result from the use of redevelopment financing for the project.

D. HOUSING

Affordable housing is a critical issue for Mammoth Lakes and the surrounding area. The DEIR projects that the project will create a need for approximately 1,230 housing units, of which approximately 800 will need to be affordable housing units, and identifies this as a significant impact. The mitigation measures for this impact state that:

100% of housing for employees generated by uses within the project should be provided onsite, including affordable employee housing based upon H&S code section 50079.5 and 50105 criteria unless the Town Council allows a portion of this

housing need off-site; through an in-lieu fee, or equivalent program.

This is an example of a case where the wording should be changed from "should" to "shall". Although a subsequent mitigation measure states that employee housing or an in-lieu fee or equivalent program should be in place prior to or concurrent with the non-residential development generating the need for such housing, it does not guarantee that it will be. In addition, depending on an as yet unprepared plan or program, such as an in-lieu fee program, conflicts with CEQA Guidelines as interpreted in Sundstrom v. County of Mendocino, 202 C.A. 3d 296 (1988). Mitigation measures cannot rely on future studies or undeveloped programs.

E. WATER

Water supply is a highly critical issue for Mammoth Lakes. As discussed in the section on cumulative impacts analysis, the DEIR fails to discuss adequately the impacts of this project and other proposed projects on the local water supply. On p. 4.6-5, the DEIR states that "the cumulative impacts of potential future developments would require MCWD to connect available groundwater supplies from the Dry Creek area to the distribution system." Yet this issue is not discussed in the cumulative impacts section and there is only a cursory discussion of the impacts on the water supply if the Dry Creek project is not brought on line and the North Village project was developed.

The discussion for Impact 4.6-1 states that there is enough water for North Village given the existing supplies, **if Lodestar does not develop at the same time**. It is unclear, however, whether this considers drought conditions such as we have had for the past several years. The concluding sentence of the impact analysis is misleading. The groundwater supplies referenced in that sentence are Dry Creek and since it is unclear at this point whether the Dry Creek wells will be put into production, it is misleading to state the project will have a less than significant impact on the water supply.

Finally, there is no discussion of the impacts of actually physically developing the Dry Creek site, including potential affects on related aquifers, including Big Spring.

F. AGENCY REVIEW

As noted in the attached letter from the Planning Department dated January 7, 1991, the Town has not complied with Public Resources Code Sections 21104 (a) and 21153. These sections require the Town to consult with and request comments from the County on a project of this nature. The County obtained a copy of the DEIR several weeks into the review period, leaving insufficient time for the County to respond thoroughly. The failure to notify the County properly is particularly disturbing since the Town also failed to notify us of the review period for the initial DEIR for this project several years ago.

MONO COUNTY
PLANNING DEPARTMENT

MONO COUNTY PLANNING DEPARTMENT

HCR 79 BOX 221
MAMMOTH LAKES, CA. 93546
619-934-7504

P.O. BOX 8
BRIDGEPORT, CA. 93517
619-932-7911 Ext. 217

January 7, 1991

Randy Mellinger
Planning Director
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Dear Randy,

We just recently picked up a copy of the Draft EIR for the North Village Specific Plan from your offices, and discovered that the review period for the DEIR ends February 3. We request that this review period be extended, preferably 45 days, for the following reasons:

- 1) CEQA Guidelines specify that the Lead Agency shall provide adequate time for other public agencies to review and comment on a draft EIR. Public Resources Code Section 21091 specifies that when the draft environmental impact report is submitted to the State Clearinghouse, the review period shall be at least 45 days. The Guidelines go on to point out that "experience has shown that 45 days is the practical minimum period of time necessary for the process at the state level". A project of this magnitude and significance certainly warrants a review period greater than the practical minimum.
- 2) The Town has not complied with Public Resources Code Sections 21104.(a) and 21153. These sections require the Town to consult with and request comments from the County on a project of this nature. Although the County has now obtained a copy of the EIR on its own initiative, several weeks of the review period have elapsed, and insufficient time exists for the County to respond in a thorough manner. Noting that the DEIR projects a \$2.86 million impact to the County, it is imperative that we be given adequate time to review the document. The failure to properly notify the County is particularly disturbing since the Town also failed to notify us of the first DEIR review period on this project several years ago, and since that time, we have continually expressed an interest in keeping informed of the progress of the project.

Your consideration of this request is appreciated. I look forward to your timely granting of the extension.

Sincerely:



Scott Burns
Planning Director

cc Bill Mayer, CAO
Jim Reed, County Counsel
Board of Supervisors



OFFICE OF THE COUNTY ADMINISTRATIVE OFFICER

C O U N T Y O F M O N O

P. O. Box 696 • BRIDGEPORT • CALIFORNIA • 93517 • (619) 532-7911

Glenn M. Thompson
County Administrative Officer

May 5, 1989

Paul Marangella
Town Manager
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA. 93546

RE: DRAFT EIR ON NORTH VILLAGE
SPECIFIC PLAN

Dear Paul:

Enclosed herewith are comments by Mono County on the Draft EIR for the North Village Specific Plan. Normally we would not comment on projects to be constructed entirely within the Town. However, it is apparent that this project will have significant impacts which will affect the unincorporated areas of the County, and under those circumstances we feel obliged by law and our responsibility to citizens of the county to comment.

I would be pleased to discuss this with you at any convenient time. The County certainly wants to cooperate with the Town in its consideration of any projects with mutual impacts.

Sincerely,


Glenn M. Thompson
County Administrative Officer

GMT:sc

cc: Board of Supervisors
Rusty Gregory

MONO COUNTY COMMENTS ON
DRAFT EIR FOR NORTH VILLAGE
SPECIFIC PLAN

A. GENERAL COMMENTS

Because of potential impacts on the County and the services it provides, the County finds it necessary to comment in some detail on the draft Environmental Impact Report (DEIR) for the North Village Specific Plan. Although other comments could be made, these comments are directed to those problems with the DEIR which relate to the County.

As these comments show, the level of discussion in the DEIR is both inadequate as a matter of law and, in some cases, lacking altogether. It is apparent that the DEIR should be amended to include the necessary discussions and reissued, or, if Guidelines Section 15162 requires it, a subsequent EIR should be prepared.

The DEIR has fragmentary discussions concerning use of a redevelopment agency to fund the project. There have also been media and public discussions of a redevelopment agency for that purpose. It is likely that any such agency will also have to certify this EIR with respect to any project it approves. Therefore, there will effectively be two opportunities for members of the public to contest the EIR. For that reason, time ought to be taken now to prepare an adequate document.

8. THE DRAFT EIR IS BASED ON AN INCOMPLETE SPECIFIC PLAN

Government Code Section 65451 sets forth the mandatory contents of a specific plan. It reads as follows:

"65451(a) A specific plan shall include a text and a diagram which specify all of the following in detail:

(1) The distribution, location, and extent of the uses land, including open space, within the area covered by the plan.

(2) The proposed distribution, location and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.

(3) Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.

(4) A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).

(b) The specific plan shall include a statement of the relationship of the specific plan to the general plan."

The specific plan totally omits the discussion of implementation measures required by subsection (a) (4). The plan simply states at page three that the Town staff will prepare the implementation plan at a later date.

Implementation of the plan is precisely what will cause many of the environmental impacts which should be discussed in the DEIR. We question how the DEIR can be adequate when the project it discusses is itself not adequately described as a matter of law.

The plan also fails to describe the "financing measures" required by subsection (a)(4). The DEIR at page 62 alludes to redevelopment, and, indeed, the public has been led to believe that redevelopment is being seriously considered as a principle financing mechanism for this entire project.

Financing through redevelopment will have impacts on the County's revenue base. This and all other financing options must be discussed as a matter of law, and the DEIR must discuss those financing options to the extent they might have any significant impacts on the environment when implemented.

In addition, CEQA Guidelines Section 15180(a) states "all public and private activities or undertakings pursuant to or in furtherance of a redevelopment plan constitute a single project." For this EIR to be utilized for a redevelopment project it must address the related activities, such as new groundwater wells and the gondola project.

C. AIR QUALITY.

At page 72 the DEIR states that the federal carbon monoxide "eight-hour standard of 9 ppm is regularly exceeded," in the project area. It further states that with the "expected 25% to 30% increase in peak hour intersection traffic at Lake Mary and Minaret and the addition of another signalized intersection requiring vehicles to stop and idle, further degradation of air quality is likely to occur at various times...."

Violations of any federal air or water quality standards are significant environmental impacts. That being so, the DEIR must contain a description of those mitigation measures which will reduce these impacts to less than significant levels, or it must recognize that the impacts are unmitigatable and thereby set the stage for adoption of a statement of overriding considerations. This DEIR does neither.

Rather, the DEIR makes two basic errors. First, it states that the individual and cumulative air quality impacts of development under the specific plan are not expected to be any worse than what has already been approved under the Town's general plan. (p. 72) Long established California law, however, makes it clear that the DEIR must discuss impacts of project development as compared to the existing environment, not some hypothetical environment which may result when some other plan is finally implemented.

Second, as an apparent mitigation measure, the DEIR states that the regional air board is "in the process of preparing" an implementation program, and that North Village would have to abide by any standards adopted as part of that program. That procedure is precluded by recent case law. In Sundstrom v. County of Mendocino, 202 C.A. 3d 296 (1988), the court found that the county's requirement that the applicant adopt mitigation measures to be recommended in a future study was in direct conflict with the CEQA guidelines. (The Draft EIR in fact relies on mitigation recommendations which might result from future studies or plans for a number of impacts.)

The bottom line is that this DEIR must discuss specific mitigation associated with this project (not the general plan or a future study) which will reduce the air quality impacts to acceptable levels. For example, a mitigation fee program could be developed whereby the project applicant would pay a mitigation

fee based on the expected number of increased vehicle trips generated by the project. The money would then be earmarked for air quality improvements projects to be carried out by the Town or regional air board. Or, the project proponent could be required to permanently retire commercial development rights which would increase vehicular traffic on lands elsewhere in the Town if utilized.

D. CUMULATIVE IMPACTS

The one page discussion of cumulative impacts at page 81 of the DEIR is inadequate. At the bottom of the page the simple conclusion is that in comparison with the previously planned development allowed under the Town's general plan, this project's cumulative effects will not be significant. That analysis has the same defect noted in the previous section of these comments, to-wit: it is a comparison of the effects of this project with some hypothetical environment. Moreover, the conclusion is not supported with any relevant discussion whatsoever, and therefore it fails the most important purpose of CEQA, which is to provide adequate information so that the public can evaluate the environmental effects of the project.

CEQA Guidelines Section 15130(b) states that the following elements are necessary to an adequate discussion of cumulative impacts:

(1) Either:

(a) A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency, or

(b) A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area-wide conditions. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency;

"(2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available, and

"(3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project."

It cannot be seriously argued that the cumulative impacts discussion in the DEIR complies with these mandatory requirements. There is no recognition, for example, of the impact of the following approved, proposed or reasonably expected projects: Juniper Ridge, Snowcreek, Sherwin Bowl, Lodestar and the gondola project associated with this Specific Plan.

There will unquestionably be impacts in the unincorporated area of the County as a result of North Village and the other listed projects. Those impacts must be discussed in this DEIR so that the County can adequately address them in the context of the Town's administrative proceedings and otherwise prepare for them in its own planning processes.

E. WATER

Water is the most significant environmental issue confronting Mammoth Lakes. Since the drainage of water courses proceeds through the Town and into unincorporated areas of the County, this is an issue of equal concern to the County. We note that Hot Creek Fish Hatchery depends on waters from the Mammoth Lakes drainage. It is also quite possible that underground waters from that drainage are important features of the hydrological characteristics of the geothermal basins in the Casa Diablo and Hot Creek areas.

The DEIR at page 28 states that it is not known whether existing water supplies will suffice during drought years. It also recognizes that during a severe drought, pumping could result in an overdraft of groundwater basins. On page 29 it states that the regional water board has indicated that surface runoff and storm water drainage has begun to deteriorate the water quality of Mammoth Creek. On page 30 it admits that flows generated by Mammoth Lakes development "undoubtedly enter the groundwater at some point and could have the potential to degrade water quality of the Owens River Basin.....and effect aquatic life and other wildlife downstream."

These are all extremely significant environmental effects. However, the DEIR does not categorize the relative impacts on any of them (other than surface runoff) which will result from the North Village project. If the incremental impacts of this project are not known, then it is difficult to see how a finding of significance or insignificance can be made with respect to any impacts on water associated with the project.

More important, there is no discussion in the DEIR of the need for additional County services in any of the following areas: library, health, legal and court, welfare, mental health, assessors, auditors, tax collectors, paramedic, landfills and airports. Obviously an increase in population of up to 20 percent of the existing County population will increase the need for such services. Providing the services will cause new economic and environmental impacts on the County. Unless sufficient revenues are generated to pay for those impacts, the burden on taxpayers in the unincorporated areas will increase accordingly.

At page 57 the DEIR list several factors which are "critical to the success of North Village." Among them are: "scheduled air service with a national carrier." This implies significant effects at the airport, which cannot now accommodate a national carrier. These effects must be discussed in the DEIR. At the very least mitigation measures relating to them must be a product of joint County, Town and project proponent discussions.

G. HOUSING

To the extent that the project and the Town in general cannot provide housing for the estimated 334 people associated with the project who will need affordable housing, the burden will fall on the County. The DEIR, at page 61, notes that 70 people will be housed at the project site, 177 in the Shady Rest development, and 106 in temporary mobile homes. This is 100 short of the need for permanent housing, and, as the DEIR notes

At page 28, at the bottom, the DEIR states with respect to water quality that: "the MCD indicates the District has adequate supplies to meet the existing demands of the community." [Emphasis added] However, North Village is not an existing project. Thus the discussion begs the real question, which is whether the impacts of this project on water quantity will be at acceptable levels when the project is constructed and operating.

If the drought envisioned by the DEIR occurs, or if water supplies are sufficient for existing but not all future needs, an alternative will have to be to look elsewhere in the County for water. If, for example, Crowley Lake is to be a source of that water, lines will have to be laid across lands under County jurisdiction. If other groundwater basins are to be a future source, people in other parts of the County are entitled to know of any related impacts. These are possible mitigation measures and should be discussed.

F. ECONOMIC EFFECTS ON MONO COUNTY

At page 53, the DEIR makes the statement that there could be an increase in population of 1000 to 2300 persons just from North Village. The only discussion of the effects on the County's ability to provide services to that number of new people is the statement on page 54 that there will be "new tax revenues to Mono County." If this project proceeds by way of redevelopment, that statement must be qualified.

on the same page, it "does not account for the 300 employees housed in North Village who will be displaced."

At the May 2 Planning Commission hearing, testimony indicated that project developers have now agreed to house 350 people on the project site. This will still leave shortage of permanent housing for over 100 people. It also raises the question of whether a supplemental EIR is needed to discuss this significant change to the project as originally proposed. The County needs to know more precisely what its new housing demands will be.

H. SIGNIFICANT EFFECTS WHICH CANNOT BE MITIGATED

The DEIR states, at page 60, that with the exception of traffic congestion at peak hours and incremental air quality degradation, all of the identified impacts have been mitigated to levels of insignificance. That is simply not the case for identified impacts. Moreover, it cannot possibly be the case for many impacts not yet identified because of the missing or inadequate levels of analysis in the EIR which have been pointed out in these comments.

At the same page, the DEIR implies that North Village may in fact have positive environmental impacts in that it "may reduce environmental impacts which would have occurred as development, otherwise, proceeded in a fragmented fashion according to the General Plan." This is the same defective analysis precluded by court decision that was noted in the discussion under paragraph C of these comments.

The most serious defect in the DEIR is the conclusion that the significant environmental impacts have been adequately mitigated.

I. AGENCY REVIEW

The Town did not comply with Section 15086 of the CEQA Guidelines during the review period of the Draft EIR. The Town is required to consult with and request comments from local agencies which exercise authority over resources which may be affected by the project. The Town did not consult or request comments from Mono County on this project, and Mono County certainly has authority over resources that may be affected by the project. Also, as we have conveyed in an earlier letter, the County believes that a 30 day review period for a project such as North Village is inappropriate.

M E M O R A N D U M

Dated: April 3, 1991
To: Town Council
From: Randy Mellinger, Planning Director 
Subject: Mono County Concerns Related to North Village

On April 2, 1991, the Board of Supervisors of Mono County indicated that the Revised Draft North Village Specific Plan and the Final EIR are legally inadequate. The attached letter from Daniel A. Paranick, Chairman, dated April 2, 1991, states that the Final EIR fails to respond to County comments on the Draft EIR; that the Specific Plan does not include financing measures necessary to carry out the Plan; and, that the inadequate Housing Element precludes the Town from acting upon the Plan.

EIR Responses

On March 26, 1991, James Reed, County Counsel, indicated in a letter to Peter Tracy, Town Attorney, that the Final EIR did not include written responses to County comments on the Draft EIR. The Town had granted an extension of the public review period for the County and the comments were received after the review period but within the extended time frame.

The EIR consultant inadvertently excluded the County comments. Therefore, Mr. Reed's contention was correct and the Planning staff read responses to the County comments into the record at the Planning Commission meeting. These comments are included in the Agenda Bill to the Town Council on the third page. The Planning Commission minutes will also reflect a written response in the record.

However, for clarification purposes, the following responses will be included as part of the record and as an addendum to the Final EIR which will fully satisfy the provisions of Section 15088 of the CEQA Guidelines.

The letters and comments from Mono County are included in the Town Council Agenda Bill beginning with the letter from James Reed dated March 26, 1991 and ending with comments from then CAO, Glenn Thompson, dated May 5, 1989.

Letter from Scott Burns, Planning Director dated February 6, 1991.

The comment indicated that the Town should include a mitigation measure in the EIR or a policy in the Specific Plan stating that redevelopment financing shall not be used for the North

Village project. The comment states that the development could have a potential impact upon the County's fiscal health, particularly "from the use of a redevelopment agency for the project."

Response:

The use of redevelopment financing is neither included in the July, 1990, proposed Draft Specific Plan nor the Revised Draft Specific Plan presented to the Planning Commission. Therefore, it is not part of this project and is not included in the EIR.

While there may be an understanding that redevelopment may not be used for North Village, its future use cannot be precluded by a mitigation measure or policy in the Specific Plan since such a measure or policy would have no force of law. The Town Council cannot preclude its police powers authorized by California Health and Safety Code Section 33000 et. seq. through a project approval such as North Village.

In addition, Section 15131 of the CEQA Guidelines states the economic effects of a project "shall not be treated as a significant effect on the environment." This section further states that "if an economic effect causes a physical change in the environment, the EIR shall explain the reason for determining that the effect is significant."

The County has not submitted evidence on how the project would negatively affect the County's fiscal health nor result in a physical change in the environment. Conversely, it appears that the County's concern is based upon the additional revenue the County would receive which could be affected by redevelopment.

However, the actual fiscal effects of redevelopment can only be determined through the redevelopment process and cannot be evaluated in this EIR since the potential effects are speculative. Pursuant to Section 15145 of the CEQA Guidelines, the Town notes that potential redevelopment effects upon the County are speculative and that no further discussion is necessary.

Comments dated January 15, 1991:

Under "General Comments", there is another reference that "a redevelopment agency would create significant impacts for the County and for the Special Districts which now receive property tax revenues from the project area."

Response:

As indicated in the response to Mr. Burns' letter, redevelopment is not part of the EIR since it is not part of the project and any effects of redevelopment are appropriately addressed through that process and not as a speculative implementation measure.

Furthermore, there is no evidence of a physical change to the environment as a result of the speculative redevelopment financing measure. Redevelopment does not reduce property taxes, does not require the use of tax increment financing, and affected taxing agencies such as the County are noticed of preparation and draft of redevelopment EIR's. Therefore, policies established at this time would be premature and would be in conflict with Health and Safety Code procedures.

Cumulative Impacts

The County indicates that impacts and mitigations regarding water supply are inadequate.

Response:

The final EIR in conjunction with the letter from Mammoth County Water District dated March 26, 1991, indicated that additional water resources are necessary to accommodate the build-out of North Village.

Therefore, clearance from MCWD is necessary prior to the issuance of building permits for projects within the NVSP based upon the existence of water resources to accommodate the individual projects as opposed to mere availability.

Fiscal Impacts Analysis

The comments indicate that the Draft EIR states that air service must be well established "by the time the higher priced, more luxurious hotels are built." It also indicates that the Draft EIR shows a fiscal negative to the County of \$2.86 million.

Response:

The Final EIR (Page 4.4-10) has been changed to read that air service maybe well established. This is also speculative and environmental review of airport expansion is not directly related to this project. There is no evidence that NVSP implementation will directly result in well established air service.

Furthermore, airport expansion is not necessarily required to accommodate expanded commercial airline service.

The fiscal analysis of impacts on the County in the Draft EIR was elementary and did not recognize the fact that the Town provides the bulk of services to this project. The Final EIR includes this recognition of the Town existence and, therefore, it concluded that the fiscal impacts upon the County will not be significant. This is based upon a lack of evidence in the record that the project will result in a physical change in the environment based upon a potential fiscal impacts.

Housing

The comment noted that the employee housing mitigation measure is not mandatory by using the word "should" instead of "shall".

Response:

The mitigation measures reflected in the Specific Plan on Page 55 and 56 regarding employee housing are mandatory.

Agency Review

This comment regarding the response time for the County.

Response:

The Town granted an extension for the County to comment.

Comments Dated May 5, 1989 from Glenn Thompson

These comments addressed a previous draft EIR and are not applicable to the current Final EIR or Specific Plan. However, the issues are virtually the same as the above comments except for air quality impacts which are mitigated by the recently adopted Particulate Emissions ordinance as identified in the Final EIR.

Specific Plan Implementation

In the various County comments, there are references to a need for the EIR and the Specific Plan to include financing mechanisms "including the possible use of a redevelopment agency."

Response:

Government Code Section 65451(a-4) requires an implementation program including financing measures to carry out the Plan but does not indicate what measures are to be included and does not specify the possible use of a redevelopment agency.

The implementation section commencing on Page 20 and extending throughout the Plan includes extensive public improvement requirements related to the development which may occur. The financing section and phasing requirements indicate that developer improvements and impact fees will be primary sources of implementation.

In addition, assessment districts and/or property owners associations are cited as financing mechanisms for improvements and maintenance. Public financing, such as that associated with Capital Improvement Programs and the Master Facilities Plan is included as a possible measure limited to improvements related to community-wide benefits.

Housing Element

The letter dated April 2, 1991, from Mr. Paranick correctly cites a Housing Element deficiency. This is based upon the lack of affordable housing units in Town and other comments from the Department of Housing and Community Development.

Response:

As with Mono County, the Town has no designated affordable units as defined by State law. To address these deficiencies, the Town completed a Housing Needs Assessment last July and has established a Housing Policy Subcommittee to address implementation.

Town Council mandate has set a target date for implementation measures being drafted by July 1, 1991. These ordinances and programs will be included in a General Plan Amendment which will bring the Housing Element into compliance in a matter of months.

Additionally, the North Village Specific Plan has a detailed and mandatory Housing Element including requirements for affordable employee housing.

SUMMARY

With the above responses, staff feels that the concerns of the County are adequately addressed.

**MONO COUNTY
PLANNING DEPARTMENT**

HCR 79 BOX 221
MAMMOTH LAKES, CA. 93546
619-934-7504

P.O. BOX 8
BRIDGEPORT, CA. 93517
619-932-7911 Ext. 217

April 2, 1991

TO: Randy Mellinger, Town Planning Director

RE: NORTH VILLAGE REDEVELOPMENT

At its meeting April 2, the Mono County Board of Supervisors took action to submit the attached letter regarding the North Village project to the Mammoth Lakes Town Council. Please enter this letter into the record of the Town Council's April 3 hearing on the North Village project. Thank you for your assistance in this matter.

Sincerely,



Scott Burns
Planning Director

cc County Counsel
Board of Supervisors



**BOARD OF SUPERVISORS
COUNTY OF MONO**

P.O. Box 715 • Bridgeport, California 93517

MEMBERS OF THE BOARD

Nancy Wells
Clerk of the Board
(619) 932-7911, Ext. 215

Michael T. Jarvis
Andrea Lawrence
Daniel A. Paranick
Donald L. Rake
William M. Reid

April 2, 1991

TO: Town Council, Town of Mammoth Lakes
RE: NORTH VILLAGE SPECIFIC PLAN

Upon review of the Revised Draft North Village Specific Plan and Final EIR, the Mono County Board of Supervisors continues to have concerns regarding the adequacies of both documents. The Board was disappointed to discover that the EIR excludes all prior Mono County comments on the project, and fails to respond to these comments in the manner required by Section 15088 of the CEQA Guidelines. In addition, the Specific Plan is inadequate in its revised form, for it does not contain the program of financing measures necessary to carry out the directives of the Plan, as required by Government Code Section 65451(a). The Board also questions how the Town could consider approving a specific plan of such magnitude when Town Officials have publicly acknowledged that the Town General Plan is inadequate, particularly its Housing Element; such an action appears to be contrary to established case law.

In consideration of these deficiencies, the Mono County Board of Supervisors requests that Town Council action on the North Village project be delayed until the EIR and Specific Plan have been amended to comply with applicable state laws.

Sincerely,

Daniel A. Paranick
Chairman
Mono County Board of Supervisors

C. Mitigation Monitoring Program

1. INTRODUCTION

CEQA Requirements

The California Environmental Quality Act (CEQA) requires the public agency approving a project to adopt a Monitoring Program to ensure effective implementation of mitigation measures contained in the EIR (Public Resources Code Section 21081.6, AB 3180, (1988)). The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

Program Objectives

The basic objectives of the North Village Specific Plan Mitigation Monitoring Program will be to achieve the following:

- To report periodically to the Town's Planning Director, who is the designated representative of The Town of Mammoth Lakes regarding project compliance with mitigation measures, performance standards and/or other conditions;
- To provide assurance and documentation that on-site mitigation measures are implemented as planned;
- To seek assurance that the physical infrastructure improvements identified as mitigation measures are provided on a timely basis by the agencies that have responsibility and jurisdiction over such improvements;
- To collect analytical data to assist The Town of Mammoth Lakes in its determination of the effectiveness of the mitigation measures used; and
- To make available to the public, upon request, the Town's record of compliance with project mitigation measures.

Organization of the Mitigation Monitoring Program

Section 1 - Introduction: Provides an overview of CEQA's monitoring and reporting requirements, program objectives, the project for which the program has been prepared, and the way in which the Mitigation Monitoring Program has been organized.

Section 2 - Description of Program: Describes The Town of Mammoth entities that are responsible for the implementation of the Mitigation Monitoring Program, the program scope, procedures for monitoring, public availability of documents, the process for making changes to the program, and the way in which monitoring will be coordinated to ensure implementation of mitigation measures.

Section 3 - Mitigation Monitoring Form: Outlines the mitigation measures, responsible entities, and the timing for monitoring for each mitigation measure included in the program.

2. PROGRAM DESCRIPTION

Responsibility for the Mitigation Monitoring Program

The Town Council is ultimately responsible for the enforcement of all adopted mitigation measures.

The Planning Commission and the Planning Department for the Town of Mammoth Lakes have overall responsibility for implementing this and other Town Mitigation Monitoring Programs and will report directly to the Town Council regarding the status of their implementation.

Under the present organization, the Town Manager will play a critical role in implementing the Mitigation Monitoring Program by assigning responsibility for monitoring and reporting of measures to appropriate departments and/or staff.

Organizations and agencies with special areas of interest will participate in the monitoring and reporting program. They will also provide the Planning Commission and/or Planning Department with periodic progress reports on the status of implementation.

The Planning Director will serve as a clearinghouse for the Mitigation Monitoring Program. The Planning Director will receive reports from other units within the Planning Department and other Town divisions and departments responsible for implementation. The Planning Department will maintain a master file containing all appropriate environmental data, statistics, reports and drawings pertaining to each project mitigation measure. Copies of all reports, checklists and verification forms relating to the implementation of mitigation measures for a particular project will be kept in a central file that will be updated on a regular basis.

Program Scope

The mitigation measures that will be monitored for the proposed project consist primarily of those that have been adopted to reduce or avoid significant impacts. In some cases, The Town of Mammoth Lakes may adopt mitigation measures that would further reduce the effect of less-than-significant impacts. Several less-than-significant impacts and associated mitigation measures have been included in this program because they are impacts of local interest and concern.

Mitigation Monitoring Procedures

The Mitigation Monitoring Program delineates responsibilities for monitoring projects, but allows responsible Town Departments flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. The timing for monitoring and reporting is described in Section 3. Mitigation Monitoring and Reporting Form, of this document. Establishing adequate monitoring procedures generally consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented.

In order to enhance the effectiveness of the monitoring program, the Town will utilize existing systems where appropriate. Specifically, with any major construction project the Town generally will have at least one inspector assigned the responsibility of inspecting the project construction. These inspectors are familiar with a broad range of regulatory issues such as OSHA compliance, and will provide the front line capabilities for much of the monitoring program.

Town planning inspectors are responsible for reporting mitigation measures related problems that may arise during implementation of the Master Plan, including such problems as non-compliance, further impacts, etc. These problems are generally corrected through directions to the appropriate mechanisms. Daily internal reporting procedures should be in place to document any problems and to address broader implementation issues.

Reporting Procedures

As just discussed, the Town's planning inspection process will be utilized as the front line for much of the monitoring program, and will also serve to provide the background documentation for the reporting program. Since these planning inspection records are voluminous and address many issues unrelated to the EIR's mitigation measures, the Town will distill and separate this information into a summary report on an annual basis through the process described below.

Reporting consists of establishing a record that a mitigation measure is being implemented. Reporting generally involves the following steps:

- The Planning Department distributes reporting forms to the appropriate Town office as indicated in Section 3 or uses that office's existing reporting process for verification of compliance.
- Responsible entities will verify compliance by either signing the Monitoring and Reporting Form or documenting compliance using their own internal procedures when monitoring is triggered.
- Responsible parties will provide verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented.
- The Planning Department will prepare a monthly report during the construction phase and an annual report during project operation plus any interim progress reports.
- Monthly and annual reports will be available at specified libraries.

2. Program Description

The monthly and annual reports to be prepared by the Planning Department will summarize the implementation status of mitigation measures for North Village Specific Plan. The monthly and annual reports will describe implementation of mitigation measures included in this program to date. Annual progress reports will evaluate the extent of progress in the provision of mitigation measures, evaluate the ability of the town to complete the mitigation measures according to schedule, and propose corrective actions as necessary.

The Planning Department is also responsible for assisting departments with reporting responsibilities to understand their charge and complete their reporting procedures accurately and on a timely basis.

Public Availability

All monitoring progress reports, summaries, data sheets, and correction instructions related to the North Village Specific Plan Mitigation Monitoring Program will be available for public review upon request at the Town Library reference room. Any questions regarding availability should be directed to the Planning Department.

Program Changes

Changes to the Mitigation Monitoring Program will be made in accordance with CEQA and would be permitted after further review by the Town Manager and approval by the Town Council. This flexibility is necessary in light of the prototype nature of the Town Mitigation Monitoring Plan Implementation process. Such changes could include reassignment of monitoring and reporting responsibilities and/or program redesign to make any appropriate improvements. No change will be permitted unless the mitigation monitoring and reporting program continues to satisfy the requirements of Public Resources Code Section 21081.6.

Types of Mitigation Measures Being Monitored

The Mitigation Monitoring form identifies the types of measures that will be undertaken by the Town to mitigate identified potential significant adverse environmental impacts of the proposed project.

The mitigation measures identified in the EIR have been divided into two broad categories for the purpose of implementing appropriate monitoring procedures. These are: a) mitigation measures related to the implementation of the North Village Specific Plan project, and b) program mitigation measures related to the ongoing implementation of other plans. The Program Mitigation Measures are generally measures required to implement cumulative impacts. Implementation of each mitigation measure in the summary table of impacts and mitigation measures will follow one of these two monitoring processes.

A. Project-Level Mitigation Measures

The North Village Specific Plan EIR specifies a number of mitigation measures that the Town will implement for the proposed project. Compliance with these mitigation measures will be accomplished through administrative controls over project planning and implementation, such as modifications to design

plans and construction contract provisions. Monitoring of these measures will be accomplished primarily as described above through verification and certification by Town personnel currently responsible for monitoring architectural and engineering contracts for compliance; additional monitoring responsibilities are also specified.

Implementation of the mitigation monitoring program will require the following actions:

- Appropriate mitigation measures will be included in design and construction documents.
- Town Departments with reporting responsibilities will review the EIR, which provides general background information on the reasons for including specified mitigation measures and will also review the EIR's specific mitigation measures.
- Problems or exceptions to compliance will be addressed as appropriate.
- Periodic meetings will be held during project implementation to report on compliance of mitigation measures.

B. Ongoing Master Plan Program Measures

The EIR for the North Village Specific Plan identifies specific actions which may not be directly linked with specific future development projects, which the Town will initiate in order to mitigate certain impacts of general Town development. Such actions are generally related to ongoing town programs such as those conducted by the Planning Department.

3. MITIGATION MONITORING AND REPORTING FORM

Table B outlines the mitigation measures included in this environmental impact report and presents them in a matrix for easy reference. Mitigation measures from each of the environmental sections of the EIR are numbered and presented along with the type of mitigation measure it conforms to. "Type of Mitigation Measure" refers to whether the mitigation measure pertains to construction of the project, is operational (i.e., ongoing), or is cumulative in nature. The table also illustrates the timing of the implementation of the mitigation measure and names the entity or agency responsible for its implementation and/or enforcement.

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.1 Geology, Soils and Seismicity			
4.1-1(a) Soils and foundation analyses shall be approved by the Public Works Director prior to final Project design approval, as stipulated in the Town's Safety Policy #18. All measures required by the Public Works Director shall be incorporated into grading plans and building plans.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-1(b) New slopes shall be constructed at an angle and degree of compaction that will ensure stability, as stipulated in the standards of the Town's Municipal Code.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-1(c) All work shall be overseen by a licensed Civil Engineer (CE), Certified Engineering Geologist (CEG), or similar appropriately qualified professional, who shall report to the Town in order to ensure the standards of the applicable Codes are met.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-1(d) Any impacts resulting from any of the above measures not analyzed by this EIR shall be subject to further environmental review and approval by the Planning Commission prior to approval of the final project design.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-2 A comprehensive Erosion and Sediment Transport Control Plan shall be prepared and approved by the Town prior to issuance of any grading or building permit. The Plan shall be included in the Project design, as stipulated in the Town's Safety Policy #18. The Plan shall also meet the requirements of the Regional Water Quality Control Board and the Town Municipal Code.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-3 Prior to issuance of grading or building permits, geotechnical studies shall be completed and their recommendations shall be incorporated in the Project design, as stipulated in the Town's Safety Policy #26.	Project	Prior to issuance of Building Permits.	Applicant Town
4.1-4 The Project Sponsor shall complete the geotechnical studies and incorporate their recommendations in the project design, as stipulated in the Town's Safety Policy #26. All structures shall be designed and built to at least the standards of UBC Seismic Zone 4.	Project	Prior to issuance of Structural Building Permits	Applicant Town
4.1-5(a) The Plan includes improvements on Lake Mary, Lakeview and Minaret Roads; these would provide residents of the slopes subdivision with improved travel routes to both of the evacuation routes leading out of the town.	Operational	Ongoing.	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.1-5(b) The developer shall cooperate with the Town in designing and disseminating information to assist citizens and visitors in responding to emergency situations that are likely to arise (Safety Policy #31). All structures shall be designed and built to at least the standards of UBC Seismic Zone 4.	Project	Prior to Certificate of Occupancy	Town
4.2 Hydrology and Water Quality			
4.2-1(a) A more complete hydrology analysis for design purposes shall be required to estimate the amounts of runoff which would be required to be retained onsite.	Project	Prior to issuance of Building Permits	Applicant Town
4.2-1(b) Runoff control shall be designed to meet the Lahontan Regional Water Quality Control Board's requirements and must be approved by the Town prior to issuance of any grading permits. Design shall be to the standards of the Storm Drain Master Plan.	Project	Prior to issuance of Grading Permits	Applicant Town
4.2-1(c) The following water conservation procedures shall be incorporated into project elements where feasible:			
▶ Landscape with low water-using plants;	Project	Prior to issuance of Building Permits	Applicant Town
▶ Install efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots, such as drip irrigation, soil moisture sensors, and automatic irrigation systems; and	Project	Prior to issuance of Building Permits	Applicant Town
▶ Use pervious paving material whenever feasible.	Project	Prior to issuance of Building Permits	Applicant Town
4.2-2 No mitigation measures required.	N/A	N/A	N/A
4.2-3(a) For each individual project considered under this development concept, disturbance of soil requires a Waste Discharge Report to be filed with the Lahontan Regional Water Quality Control Board and a Waste Discharge Permit to be issued for the project to ensure that proper control measures for the protection of water quality are taken and adhered to during all phases of the project.	Operational	Ongoing	Applicant LRWQCB

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.2-3(b) See Mitigation Measure 4.1-2.	Project	Prior to issuance of Building Permits	Applicant Town
4.3 Biological Resources			
4.3-1(a) The Project shall preserve existing native vegetation to the maximum extent feasible. Landscaping shall emphasize the use of native plants indigenous to the Jeffrey Pine-Fir Forest, Sagebrush Scrub, and Riparian plant communities. Whenever possible, native plants used onsite shall be selected for their replacement habitat value. Site designs shall be subject to the Design Review procedure of the Town.	Project	Prior to issuance of Building Permits	Applicant Town
4.3-1(b) All trees greater than 12 inches dbh (diameter breast height) and significant stands on the Project site shall be mapped prior to issuance of grading permits or clearing. A registered forester or arborist shall then determine the age and condition of these trees and whether they should be retained or removed based upon health and visual significance of the trees, except for removal required by approved improvements. Once this determination is made those trees should be retained and integrated into the design of the Project. A program of specific protection measures shall be prepared by the developer and approved by the Town prior to issuance of any construction permits (e.g., construction fencing, grading controls, grading design, etc.) Any trees removed unavoidably by the final Project approval shall be replaced in accordance with Town Policies. Off-site replacement will need the approval of the Town Planning Director.	Project	Prior to issuance of grading and construction permits	Applicant Town
4.3-1(c) Construction and site development, such as grading and trenching, shall be prohibited within the dripline of retained trees. Equipment shall not be stored or driven under trees. Grading shall not cover the ground surface within the dripline of existing trees. Grading limits shall be clearly defined and protected.	Project	During construction phase	Applicant
4.3-1(d) Landscape materials shall be incorporated into a landscape plan which allows for the protection and preservation of existing trees. Native plant species, preferably from seed or cuttings from local plants, shall be used where possible. The landscape plan shall be approved by the Planning Director prior to issuance of any construction permits.	Project	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.3-1(e) Irrigation, fertilization, and other landscape management practices shall be designed to minimize effects on existing trees and other vegetation.	Project	Prior to issuance of Building Permits	Applicant Town
4.3-1(f) Proper disposal methods for all coniferous slash shall be used in order to prevent the spread of bark beetles.	Operational	Ongoing	Applicant Town
4.3-2 Implement Mitigation Measure 4.3-1 above.	Same as MM 4.3-1	Same as MM 4.3-1	Applicant Town
4.3-3 None required.	N/A	N/A	N/A
4.3-4(a) To retain wildlife values, as much native vegetation as possible should be retained and protected during construction. A Revegetation Plan, prepared by a qualified botanist and approved by the Town of Mammoth Lakes, shall be completed prior to the commencement of the Project which will describe in detail the species of trees and shrubs which will be used, where they will be planted and in what numbers, and the methods of planting and maintenance which will ensure successful growth. It shall include a monitoring program to follow the progress of new plantings and ensure replacement of unsuccessful plants. Landscaping with native species of trees and shrubs shall be undertaken wherever possible to enhance wildlife use of cleared areas. Any trees unavoidably removed by the final Project approval shall be replaced on a one-to-one basis on or offsite. Off-site replacement will need the approval of the Town Planning Director.	Project	Prior to issuance of Building Permits.	Applicant Town
4.3-4(b) Under the recently enacted AB 3180, once mitigation plans designed to offset habitat losses are approved and the specific areas where they will be located are identified, the proponent must provide a program to monitor their progress for a period of time (usually three to five years) deemed sufficient by the Planning Director to assure their successful development. Adequate security shall be deposited with the Town to ensure successful implementation of this measure.	Operational	Following habitat mitigation plan approval	Applicant Town
4.3-5 All construction activities, including movement and storage of vehicles and the storage of building and other materials, shall be confined to areas slated for development. Care shall be taken during construction to avoid damage to vegetation and habitats not directly involved in Project construction. Any damaged vegetation shall be replaced on a one-to-one basis on- or off-site. Off-site replacement will need the approval of the Town Planning Director.	Project	During Construction Phase	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.3-6 To prevent erosion and siltation into intermittent creeks, areas cleared of vegetation, fill or other materials shall be stabilized as quickly as possible after clearing and grading. Hay bales, silt screens or similar devices should be used to prevent siltation. To further protect the drainage system and prevent erosion, all grading and construction shall be completed during the dry summer months or, after October 15 of each year, be in a condition to be stabilized within 48 hours should inclement weather threaten.	Project	During Construction Phase	Applicant
4.4 Land Use and Planning			
4.4-1(a) The height of the proposed gondola should be maintained at or near a maximum of 90 feet (just below the tree line), in order to protect views from adjacent residential buildings.	Project	Prior to issuance of Building Permits	Applicant Town
4.4-1(b) To the maximum extent feasible existing trees located along the gondola easement shall be retained. Replacement trees, in addition to those existing, shall be planted adjacent to the gondola easement (with property owner approval) in order to create a buffer that will protect privacy and minimize visual impacts on affected properties.	Project	Prior to issuance of Building Permits	Applicant Town
4.4-1(c) Natural earth tone colors and non-glare, non-reflective materials shall be used for the gondola towers and cabins.	Project	Prior to issuance of Building Permits	Applicant Town
4.4-2 The North Village Specific Plan suggests a specific schedule of development and specific mix of uses to prevent a worst case scenario from happening. A carefully-phased development plan shall help to preclude market saturation, as the success of the North Village's economic climate is as essential as it is critical to the vitality of the Town of Mammoth Lakes. Modification of the phasing plan shall be approved by the Planning Commission of the Town of Mammoth Lakes. Modification of use permitted shall be subject to Town Council determination as part of the approval process of this Specific Plan or any future modification.	Operational Project	Prior to issuance of Building Permits	Applicant Town
4.4-3 Prior to every development phase of the proposed project, the plan for that proposed phase shall be submitted to the Town of Mammoth Lakes, North Village Design Review Committee and the North Village Association for approval of transition of uses between new urban development and existing adjacent uses.	Project Operational	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

	Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.4-4	None required.	N/A	N/A	N/A
4.4-5	None required.	N/A	N/A	N/A
4.4-6	None required.	N/A	N/A	N/A
4.4-7	None required.	N/A	N/A	N/A
4.4-8	None required.	N/A	N/A	N/A
4.4-9	None required.	N/A	N/A	N/A
4.5 Jobs/Housing				
4.5-1	None required.	N/A	N/A	N/A
4.5-2(a)	100 percent of housing for employees generated by uses within the project shall be provided onsite, including affordable employee housing based upon Health and Safety code section 50079.5 and 50105 criteria unless the Town Council allows a portion of this housing need offsite, through an in-lieu fee, or equivalent program. If the Town adopts an employee/affordable housing program, requiring on- or off-site housing or in-lieu fees prior to any phase of development, provision of housing in accordance with that ordinance shall constitute adequate mitigation.	Project	Prior to issuance of Building Permits	Applicant Town
4.5-2(b)	Any housing constructed offsite shall be subject to further environmental review to ensure that significant or cumulative environmental effects are mitigated on a site-specific basis.	Project	Prior to issuance of Building Permits	Applicant Town
4.5-2(c)	Employee housing or an in-lieu fee or equivalent program as approved by the Town Council shall be in place prior to or concurrent with the non-residential development generating the need for such housing.	Project	Prior to issuance of Building Permits	Applicant Town
4.6 Utilities				
4.6-1	The project operations will have to comply with all MCWD water conservation restrictions. In addition, the project should use:	Operational	During construction phase	Applicant MCWD

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
<ul style="list-style-type: none"> ■ ultra-low flow plumbing fixtures ■ native and/or drought-tolerant landscaping ■ reclaimed water where feasible 			
4.6-2(a) The project proponent shall contribute "fair share" mitigation fees, as determined by the Mammoth County Water District, for expanded facilities needed to serve cumulative development demands.	Operational	Ongoing	Applicant MCWD
4.6-2(b) In the event that additional supplies are not developed in a timely fashion, development shall be deferred pending existence of adequate water as determined by MCWD.	Operational	During construction phase	Applicant MCWD
4.6-2(c) Landscaping shall be predominately native and drought resistant vegetation.	Project	During construction phase	Applicant Town
4.6-3 The Project shall comply with all requirements of Mammoth County Water District regarding flow reduction, and sewer system design and operation.	Project	Prior to issuance of Building Permits	Applicant MCWD
4.6-4 None required.	N/A	N/A	N/A
4.6-5(a) Alternate methods of solid waste disposal, such as the use of onsite trash compaction, shall be incorporated into the final Project design subject to the approval of the Mammoth Lakes Planning Department.	Project	Prior to issuance of Building Permits	Applicant Town
4.6-5(b) All visible trash collection facilities and features of the development shall be designed to complement the Project design scheme.	Project	Prior to issuance of Building Permits	Applicant Town
4.6-5(c) The Project applicant shall provide a recycling collection station or contract a solid waste disposal company which will offer a system of convenient recycling stations for Project residents. Placement and design shall be subject to the review and approval of the Planning Director.	Project Operational	Prior to issuance of Building Permits; ongoing	Applicant
4.6-5(d) The Project applicant shall provide each residence with a divided cabinet suitable for aluminum cans, glass bottles, and plastic bottles.	Project	Prior to issuance of Building Permits	Applicant
4.6-6 None required.	N/A	N/A	N/A
4.6-7 None required.	N/A	N/A	N/A

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.7 Traffic			
<p>4.7-1 Roadway Improvements</p> <p>The project could be required to contribute "in lieu" fees for transit system improvements if the transit system design study soon to be undertaken by the Town determines that the need for the roadway capacity improvements would be obviated by the reduced level of vehicular mps potentially resulting from increased transit ridership due to an improved transit system. It is anticipated that the continue need for certain roadway improvements and the level of developer financial participation in support of an improved transit system would be determined by the upcoming transit system study.</p> <p><u>Minaret Road (Main Street/Lake Mary Road to south of Old Mammoth Road)</u> - Widen Minaret Road from Main Street/Lake Mary Road to south of Old Mammoth Road to provide four through travel lanes. This improvement would be consistent with the Town of Mammoth Lakes General Plan, which designates Minaret Road as an arterial.</p> <p><u>Old Mammoth Road (Main Street to south of Chateau Road)</u> - Widen or re-stripe Old Mammoth Road from Main Street to south of Chateau Road to provide four travel lanes while maintaining the existing continuous left-turn lane.</p> <p><u>Lake Mary Road (Main Street to Lakeview Road)</u> - Widen Lake Mary Road between Main Street and Lakeview Road to provide four travel lanes. The westbound through lane in this road segment would become an exclusive right-turn lane at the intersection with Lakeview Road.</p> <p><u>Main Street (Sierra Boulevard to Minaret Road)</u> - Provide a two-way continuous left-turn lane in the median by widening Main Street between Sierra Boulevard and Minaret Road. This would be consistent with the existing two-way continuous left-turn lane east of Sierra Boulevard.</p>	Cumulative	Prior to issuance of Certificate of Occupancy	Caltrans
<p>4.7-2 Intersection Improvements</p> <p>The following intersection improvements recommended to mitigate cumulative plus project conditions are in conjunction with the roadway improvements described above.</p>	Cumulative	Prior to issuance of Certificate of Occupancy	Caltrans

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
<p><u>Minaret Road/Forest Trail</u> - Widen Minaret Road just north of Forest Trail to provide two southbound lanes, resulting in one left-turn lane, one through lane and a through/right-turn lane on the southbound Minaret approach to Forest Trail. Provide north-south protected/permissive left-turn phasing. Restripe the eastbound approach to provide a right turn lane and provide a right-turn overlap phase. Restripe the westbound approach (widened as part of the North Village Specific Plan improvements) for a left-turn lane and a through/right-turn lane.</p>			
<p><u>Lakeview Road/Lake Mary Road</u> - Restripe the eastbound Lake Mary Road approach to provide one left-turn lane and one through lane (which would be the second eastbound through lane recommended as part of the Lake Mary Road widening east of Lakeview Road); widen the westbound Lake Mary Road approach to provide one through lane and one right-turn lane (which would be the second westbound through lane recommended as part of the Lake Mary Road widening east of Lakeview Road) and restripe the southbound Lakeview Road approach to provide one left-turn lane and one shared left/right-turn lane. These improvements would be in addition to the installation of a traffic signal, widening and grade reductions proposed in the North Village Specific Plan Circulation Plan.</p>			
<p><u>Minaret Road/Main Street/Lake Mary Road</u> - Widen the northbound Minaret Road approach to provide a right-turn lane. Widen the southbound approach to provide the following configuration: two left-turn lanes, one through lane, and one through/right-turn lane. Restripe the westbound approach to provide a second left-turn lane. Provide eight-phase signal operation by modifying the northbound and southbound from split phasing to protected left-turn phasing.</p>			
<p><u>Sierra Boulevard/Main Street</u> - Restripe Main Street to provide a left-turn lane on the eastbound approach (in conjunction with the recommended widening of Main Street to provide a two-way continuous left-turn lane). This would remove turning vehicles from the through traffic lanes and thus improve the overall operation of the intersection. Also, restripe the southbound approach to provide a left-turn lane and a right-turn lane. This would reduce the delay to right turning traffic caused by vehicles waiting to turn left from a single approach lane. The intersection comes very close to meeting signal warrants with the projected traffic and should be monitored periodically to determine if the actual future volumes or accident incidence warrant the installation of a signal.</p>			

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
<p><u>Old Mammoth Road/Main Street</u> - Restripe the northbound approach to provide one left-turn lane and one shared left/right-turn lane. The two-lane southbound departure should be modified to provide for a continuous eastbound to southbound movement. Traffic turning left from the westbound approach would be able to turn into the other southbound departure lane.</p>			
<p><u>Minaret Road/Meridian Boulevard</u> - Widen both the northbound and southbound Minaret Road approaches to provide one left-turn lane, one through lane, and one through/right-turn lane on each approach. Widen the eastbound approach to provide a right-turn lane with a right turn overlap. Provide left-turn lanes on the eastbound and westbound Meridian approaches.</p>			
<p><u>Old Mammoth Road/Meridian Boulevard</u> - Widen the northbound and southbound Old Mammoth approaches to provide one left-turn lane, two through lanes, and one right turn lane.</p>			
<p><u>Minaret Road/Old Mammoth Road</u> - This intersection will satisfy traffic signal warrants under cumulative conditions. Install an eight-phase traffic signal, with protected left-turns on all approaches. Widen the northbound and southbound Minaret approaches to provide one left-turn lane. Two through lanes and one right-turn lane. Widen the westbound approach to provide two left-turn lanes, one through lane and one right-turn lane; widen the eastbound approach and departure to provide one left-turn through lane, one through lane, and one right-turn lane. The additional eastbound through lane should be extended approximately 300 feet past the intersection and the two through lanes could then transition back into one lane.</p>			
4.8 Air Quality			
<p>4.8-1(a) To reduce the potential for nuisance due to dust and odors, all construction contracts shall require watering twice daily with complete site coverage; the frequency of watering shall increase as necessary to minimize dust if wind speeds exceed 15 mph.</p>	Operational	During Construction Phase	Applicant Town
<p>4.8-1(b) Drift fencing tackifiers and covering of stockpiles shall be used in areas not under active construction.</p>	Operational	During Construction Phase	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.8-2 To reduce the potential of spot violations of the CO standards and odors from construction equipment exhaust, unnecessary idling of construction equipment shall be avoided.	Operational	During Construction Phase	Applicant Town
4.8-3 Development will not be allowed within 50 feet of the Old Mammoth and Main intersection.	Operational	During Construction Phase	Applicant Town
4.8-4 Adopt and enforce Control Measures 1 through 7 of the Town of Mammoth Lakes Draft Air Quality Management Plan (Table 4.8-3).	Operational	Ongoing	Applicant Town
4.8-5(a) Residential units shall be limited to one woodburning appliance per dwelling. The appliance must be an EPA Phase II-certified woodburning stove or pellet stove. Woodburning shall comply with standards in the Town's woodburning ordinance (Chapter 8-30, Particulate Emissions Regulations).	Project	Prior to issuance of Building Permits	Applicant Town
4.8-5(b) Each hotel may have only one fireplace in the lobby or other common area. No other solid fuel appliances shall be allowed.	Project	Prior to issuance of Building Permits	Applicant Town
4.8-5(c) All structures shall have high-efficiency central heat.	Project	Prior to issuance of Building Permits	Applicant Town
4.9 Noise			
4.9-1(a) Construction activities shall be limited to the hours between 7 a.m. and 8 p.m. Monday through Saturday and 9 a.m. to 5 p.m. on Sunday in order to minimize noise impacts.	Operational	During Project Construction Phase	Applicant Town
4.9-1(b) Construction equipment shall be required to be muffled or controlled. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers. Copies of contracts shall be filed with the Public Works Director prior to issuance of permits.	Project	During Project Construction Phase	Applicant Town
4.9-2(a) Sensitive noise receptors within the proposed project shall be located or architecturally designed so the exterior noise levels will not exceed 60 dB and interior noise levels will not exceed 45 dB.	Project	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.9-2(b) Multi-family buildings shall be located or architecturally designed so the interior noise level will not exceed 45 L _{dn} , certified by an acoustical engineer.	Project	Prior to issuance of Building Permits	Applicant Town
4.9-2(c) Transit alternatives to reduce traffic, as recommended in the Transportation section of this EIR, shall be included in project design to reduce traffic-generated noise levels and their impact on the proposed project and adjacent land uses. Typically a reduction in traffic of one-half would reduce the noise level by 3 dB.	Cumulative	Prior to issuance of Building Permits	Applicant Town
4.10 Archaeological Resources			
4.10-1(a) North Village Site #1 shall be subject to subsurface testing and a thorough archaeological survey prior to issuance of a permit for grading or construction. If found to be significant, the site should be avoided or excavated prior to any earth-disturbing activities.	Project	Prior to issuance of Grading Permits	Applicant Town
4.10-1(b) North Village Site #2 shall be avoided or excavated prior to any earth-disturbing activity. All construction activity at this site and previously unexcavated sites shall be monitored by a qualified archaeologist. If subsurface prehistoric archaeological evidence is found, excavation or other construction activity in the area shall cease and an archaeological consultant shall be retained to evaluate findings in accordance with standard practice and applicable regulations. Data/artifact recovery, if deemed appropriate, shall be conducted during the period when construction activities are on hold.	Project	Prior to issuance of Structural Permits	Applicant Town
4.10-1(c) North Village #1 may meet the CEQA criteria for important sites, for its ability to address scientifically consequential research questions. The site will be impacted by construction. Although avoidance might be considered the preferred treatment for a buried site, the adoption of any mitigation measures would be premature before the site's significance is determined. In accordance with CEQA, any construction within the site area shall be preceded by data recovery. This will include excavation of up to five 25 by 25 cm shovel test units, surface collection of all surface artifacts, lithic and obsidian hydration analyses and possibly soil chemistry and obsidian source analysis. If no substantial subsurface deposit is encountered, this work would also suffice for data recovery. No permits for grading or other earth-disturbing activities will be issued until all appropriate mitigations are completed.	Project	Prior to issuance of Structural Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.10-1(d) North Village #2 appears significant. The site is in danger of slow degradation even in the absence of any construction. Its location and high visibility make it susceptible to casual collection and indirect impacts. In accordance with CEQA, any construction within the site area shall be preceded by data recovery. Minimally this would include a sample surface collection, excavation of at least six 1 by 1 m excavation units, analyses, curation of collected materials, and a report. No permits for grading or other earth-disturbing activities will be issued until all appropriate mitigations are completed.	Project	Prior to issuance of Structural Permits	Applicant Town
4.10-2 See Mitigation Measure 4.10-1; in addition, if human remains are discovered, work shall cease and an appropriate representative of Native American Indian groups and the County Coroner shall both be informed and consulted, as required by State law.	Project	Prior to issuance of Structural Permits	Applicant Town
4.11 Aesthetics/Visual Quality			
4.11-1(a) To the maximum extent feasible, the proposed Project shall retain forested areas of the site, and shall remain subordinate to the natural character of the site and the surrounding landscape.	Project Operational Cumulative	Ongoing	Applicant Town
4.11-1(b) Prior to final approval of project development plans the applicant shall submit a tree preservation and replacement plan prepared by a professional forester, arborist or landscape architect. Trees shall be replaced on a one-to-one basis with as many trees retained on-site as possible. Where trees have to be relocated off-site, the locations shall be determined through consultation with the Planning Director. The plan, including the type, size, number, and location of replacement trees shall be subject to the approval of the Town of Mammoth Lakes Planning Department.	Project Operational Cumulative	Prior to issuance of Building Permits; ongoing	Applicant Town
4.11-1(c) Contour grading shall be used to blend manufactured slopes into the natural terrain. Grading shall be minimized to preserve existing landform and vegetation to the greatest extent possible.	Project	Prior to issuance of Building Permits	Applicant Town
4.11-1(d) In order to reduce visual impacts, a forested buffer averaging no less than 100 feet shall be retained along Lake Mary Road, the southern extension of Minaret Road, and along the western and eastern edges of the project site.	Project	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
Special buffering and height restrictions shall be given to the hotel that is proposed for development across Forest Trail from the Town's community center.			
4.11-1(e) The landscape design for the site shall maximize the use of existing vegetation, and where new plants are introduced, they shall include, and/or blend with, plants native to the Mammoth Lakes environment. Landscape Plans for the site shall be completed by a certified landscape architect.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-1(f) To the maximum extent feasible, native trees and landscaping shall be concentrated around all structures located on the project site.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-1(g) Grading shall utilize decorative retaining walls rather than slopes to minimize the area of disturbance.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-2(a) The height of the proposed gondola shall be maintained at or near a maximum of 90 feet (just below the tree line), in order to protect views from adjacent residential buildings.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-2(b) To the maximum extent feasible, existing trees located along the gondola easement shall be retained. Replacement trees, in addition to those existing, shall be planted adjacent to the gondola easement (with property owner approval) in order to create a buffer that will protect privacy and minimize visual impacts on affected properties.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-2(c) Natural, earth-tone colors and non-glare, non-reflective materials shall be used for the gondola towers and cabins.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-3(a) Adoption of the North Village Specific Plan shall include all provisions for design review stated in the Plan, with all phases and developments proposed within the Specific Plan area undergoing review by a Town appointed Design Review Committee and/or Planning Commission.	Operational	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-3(b) The design and height limits of hotels along the ridgeline in the western portion of the site, and along Lake Mary Road, shall be carefully reviewed for visual impacts. The height, massing and visibility of these hotels shall respond to, and be compatible with, the natural environment and "Town" character of Mammoth Lakes.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.11-3(c) The architectural style for all development shall blend with the site's natural setting. Rooflines shall reflect the slope of the site, and natural "earth tone" colors and materials such as stone and wood shall be emphasized. Project development plans (Use Permits & Building Permits) shall be subject to design review by the Town of Mammoth Lakes Planning Commission.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.11-3(d) In order to reduce the visual impact of the proposed Minaret Road pedestrian overpass, the structure's height and visual mass shall be kept to a minimum. The design and materials used for the overpass shall be compatible with the materials and architectural character of North Village.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.12 Light and Glare			
4.12-1(a) All exterior lighting shall be designed and located so as to avoid intrusive effects on adjacent residential properties and undeveloped areas adjacent to the project site. Low-intensity street lighting and low-intensity exterior lighting shall be used throughout the development to the degree feasible.	Project	Prior to issuance of Certificate of Occupation	Applicant Town
4.12-1(b) Lighting used for various components of the development plan shall be consistent with North Village Specific Plan implementation standards for light intensity levels, fixture height, fixture location, and design.	Project	Prior to issuance of Building Permits	Applicant Town
4.12-1(c) Vegetative buffers shall be used to reduce light intrusion on residential development and on forested areas located adjacent to the project site.	Project	Prior to issuance of Building Permits	Applicant Town
4.12-2 The project shall use minimally reflective glass and all other materials used on exterior buildings and structures (including the gondola cabins and towers), should be selected with attention to minimizing reflective glare.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.13 Public Services/Fiscal Impacts			
4.13-1(a) All project road alignments and project phases shall be designed to provide the necessary snow storage areas as determined by the Town Department of Public Works. Snow storage areas shall equal at least 10 percent of the surfaces to be cleared.	Project	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.13-1(b) All buildings, walkways and pedestrian open spaces shall be located a minimum of 20 feet from the roadway edge to limit the amount of snow storage/blowing interference.	Project	Prior to issuance of Building Permits	Applicant Town
4.13-1(c) Alternate methods of snow removal, such as radiant heat decking, shall be implemented in the plaza area. Access the plaza shall be provided at all times to provide for snow removal services.	Operational	Ongoing	Applicant Town
4.13-1(d) Parking garage entry points shall avoid north-facing orientation. Design solutions shall be implemented to prevent blowing and drifting snow from accumulating in the garage entry area.	Project	Prior to issuance of Building Permits	Applicant Town
4.13-1(e) Sloping roofs shall be designed so as not to shed snow onto adjacent properties, parking lots, walkways or other passage ways.	Project	Prior to issuance of Building Permits	Applicant Town
4.13-1(f) The Town and CALTRANS shall retain the right to cover with snow any sidewalks located adjacent to streets during snow removal activities.	Operational	Ongoing	Town Caltrans
4.13-1(g) No snow removal activities, except that which is performed by the Town or by CALTRANS, shall be allowed to deposit snow within the public rights-of-way.	Operational	Ongoing	Applicant Town
4.13-1(h) To avoid ice build-up, all structures shall be oriented to prevent shading of streets and pedestrian areas to the fullest extent feasible.	Project	Prior to issuance of Building Permits	Applicant Town
4.13-1(i) Clearing of private roads shall be handled by the North Village maintenance district.	Operational	Ongoing	Applicant Town
4.13-1(j) Snow associated with the plaza will be hauled offsite and deposited at a suitable location.	Operational	Ongoing	Applicant Town
4.13-2(a) The project proponent shall pay school impact fees under the provisions of AB 2926 or provide equivalent alternative mitigation as determined by the School District.	Operational	Ongoing	Applicant MUSD
4.13-2(b) The project proponent may volunteer to designate a portion of the project site to the District for the purpose of constructing a new elementary school	Operational	Ongoing	Applicant MUSD

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
facility or to participate in a proportionate share of a school site at another location.			
4.13-3(a) All conceptual and final development plans shall be reviewed by the Mammoth Lakes Police Department for crime-prone design features prior to plan approval. Police Department recommendations shall be included in final plans.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.13-3(b) If not provided by the developer, phasing plans shall also include the provision of police protection by the Town.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.13-3(c) The project proponent shall contribute sufficient funds to the Town of Mammoth Lakes for the cost of purchasing one patrol car.	Operational	Ongoing	Applicant Town
4.13-3(d) The Project proponent shall contribute an amount to the California Highway patrol for the purchase of equipment needed as a result of the project. This amount shall be determined through negotiations between the California Highway Patrol and the Project proponent.	Operational	Ongoing	Applicant CHP
4.13-4(a) A fire lane shall be dedicated to all of the commercial properties of North Viillage. Access to all structures shall comply with Mammoth Lakes Fire Protection District Ordinance #85-02. Access roads shall be of an approved hard all-weather surface and shall have a minimum clear unobstructed width of 20 feet. All access roads shall have a minimum vertical clearance of 15 feet. Access roads shall have a grade of not more than ten percent. To provide for aerial ladder access to building rooftops, a minimum 20-foot wide access road shall be provided for each structure located not more than 25 feet from the structure, but no closer than one foot for every three feet of building height. This access road shall have a grade of not more than three percent and shall be clearly posted "No Parking - Fire Lane." All high-rise structures (defined by the District as any structure exceeding three stories or 35 feet in height for nonresidential structures, and 55 feet for residential structures) shall be required to have approved Fire Department access roads to at least two sides of the structure. One of these access roads shall be on the side of the building with the longest continual roof line. Fire Department access roads that are 150 feet or more in length shall be provided with approved fire apparatus turn-arounds. The required width and height clearances for Fire Department access roads shall be maintained.	Project	Prior to issuance of Certificate of Occupancy	Applicant Mammoth Lakes Fire Protection District (MLFPD)

TABLE B
North Village Specific Plan Mitigation Monitoring Program

Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.13-4(b) The project proponent shall pay a one-time mitigation fee for construction of the project, based upon building height, and another one-time fee on project operations. Both fees are to be determined by the Fire Protection District and collected by Town.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(c) A lane shall also be designed within North Village to allow access to surrounding neighborhoods. If a smoke tower or stairway is used as a required exit for a structure, that exit shall have an unobstructed passage of not less than six feet in width to the Fire Department access; and, from that point, not less than three feet in width to the public way.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(d) An approved water supply system capable of supplying required fire flow for fire protection purposes shall be provided to all premises upon which buildings or portions of buildings are constructed. The establishment of gallons-per-minute requirements for fire flow shall be based on the "Guide for Determination of Required Fire Flow" published by the Insurance Service Office.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(e) Fire hydrants shall be located and installed per Fire Department standards and approved by the Fire Chief. On-site fire hydrants shall be provided when any portion of the building protected is in excess of 150 feet from a water supply on a public street, or as required by the Fire Chief.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(f) Fire hydrants and access roads shall be installed and made serviceable prior to and during time of construction. All hydrants shall be properly identified per Fire Department standards.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(g) An approved automatic fire extinguishing system shall be installed in all covered parking areas and other structures having: a foundation footprint of 5,000 square feet or more; a height of more than 35 feet (50 feet for residential condominiums or apartment buildings); or a height of more than three stories. Fire extinguishing systems shall also be installed for all other occupancies designated for this system in the Uniform Fire and Uniform Building Code, or structures identified as special hazard occupancies as outlined in the appropriate National Fire Protection Association pamphlet.	Project	Prior to issuance of Building Permits	Applicant MLFPD

TABLE B
North Village Specific Plan Mitigation Monitoring Program

	Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.13-4(h)	Fire standpipe systems shall be installed in conformance with National Fire Protection Association Standards and the Uniform Fire Code.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(i)	Incorporation of other fire protection methods as necessary in underground parking garages and high-rise structures based upon building construction, size, and adjoining occupancy types, shall be determined by the Fire Chief upon formal plan submission.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(j)	All vehicular bridges and pedestrian bridges shall comply with fire apparatus access road requirements in regards to minimum width and height clearances.	Project	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(k)	Liquid petroleum gas storage and system installation shall comply with Mammoth Lakes Fire Protection District Ordinance #85-02, which establishes and regulates the storage of liquid petroleum gases.	Project Operational	Prior to issuance of Building Permits	Applicant MLFPD
4.13-4(l)	The developer shall contribute a fair share proportional amount as determined by the MLFPD for the purchase of a new aerial ladder.	Operational	Ongoing	Applicant MLFPD
4.13-5	To help offset this increase in demand for parkland in the Town of Mammoth Lakes, the project proponent shall be required to help fund the dedication of an off-site park or recreation facility.	Operational	Ongoing	Applicant Town
4.13-6	None required.	N/A	N/A	N/A
4.13-7	Implement Mitigation Measure 4.13-2(a) and 4.13-2(b).	Operational	Ongoing	Applicant MLFPD
4.13-8	None required.	N/A	N/A	N/A
4.13-9	Implement Mitigation Measure 4.13-4(b).	Project	Prior to issuance of Building Permits	Applicant Town
4.13-10	None required.	N/A	N/A	N/A
4.13-11	None required.	N/A	N/A	N/A

TABLE B
North Village Specific Plan Mitigation Monitoring Program

	Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.14 Energy Conservation				
4.14-1	None required.	N/A	N/A	N/A
4.14-2(a)	Energy efficient lighting (e.g., high-pressure sodium outdoor and fluorescent indoor lighting) shall be used rather than less efficient types. Where possible, miniature fluorescent lamps shall be used rather than incandescent lamps in fixtures. External lighting shall be controlled by photocells and/or time switches. Internal lighting systems shall employ separate switching schemes to ensure maximum use of daylight. Public area lighting, both interior and exterior, shall be time controlled for safety and protection.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.14-2(b)	Thermal insulation that meets or exceeds standards established by the State of California and the Department of Building and Safety shall be installed in all walls and ceilings.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.14-2(c)	Feasible opportunities for passive or natural heating and cooling shall be incorporated in the building designs, which could include: tinted or solar reflective double glazing and heat reflective draperies on appropriate exposures; windowless walls for certain exposures or appropriate passive solar inset of windows; thermal insulation in walls which meets or exceeds State and local standards; and placement of the focus of pedestrian activity within sheltered outdoor areas.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.14-2(d)	The incorporation of high-efficiency air conditioning controlled by computerized energy management systems shall be installed to provide the following: variable air volume systems which result in minimum energy consumption and which avoid hot water energy consumption; 100 percent outdoor air economizer cycles to obtain free cooling during cool and dry climatic periods; sequential operation of air conditioning equipment in accordance with building demands; the isolation of air conditioning to any selected floor or floors; and time-controlled interior and exterior public area lighting as necessary for security purposes.	Project	Prior to issuance of Certificate of Occupancy	Applicant Town
4.14-2(e)	The project sponsor shall consult with the Southern California Edison Company for assistance with energy conservation design features and other passive energy design features.	Project	Prior to issuance of Building Permits	Applicant Town

TABLE B
North Village Specific Plan Mitigation Monitoring Program

	Mitigation Measures	Type	Time of Implementation	Responsible Entity
4.14-2(f)	The feasibility of geothermal energy as an alternative energy source shall be explored.	Project	Prior to issuance of Building Permits	Applicant Town