

5.0 ALTERNATIVES

A. INTRODUCTION

As indicated in California Public Resources Code Section 21002.1(a), the identification and analysis of alternatives to a Project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a Project. Guidance regarding the definition of Project alternatives is provided in State *CEQA Guidelines* Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives.

The *CEQA Guidelines* emphasize that the selection of Project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed Project, “even if these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly.”¹ The *CEQA Guidelines* further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.²

In selecting Project alternatives for analysis, potential alternatives should be feasible. The *CEQA Guidelines* Section 15126.6(f)(1) explains that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The *CEQA Guidelines* require the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the Project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.³

CEQA Guidelines Section 15126.6(d) states that evaluation of alternatives shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed Project. If an alternative would

¹ *CEQA Guidelines* Section 15126.6(b).

² *Ibid.*, Section 15126.6(f).

³ *Ibid.*, Section 15126.6(e)(2).

cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project.

B. OBJECTIVES OF THE PROJECT

Chapter 2, Project Description, of this EIR sets forth the Project's underlying purpose and provides a list of objectives. The intent of the proposed Land Use Element and Zoning Code Amendments as well as the Mobility Element Update is to achieve a sustainable and integrated system of land use and transportation in the Town of Mammoth Lakes. More specifically, the proposed changes in the development standards and Mobility Element Update are to:

- Create flexibility in the development standards in the commercial districts through the removal of the unit/room cap and the use of a floor area ratio so as to focus on the overall size of a structure;
- Cluster greater density in the downtown area to reduce vehicle miles travelled;
- Create a park-once downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles travelled;
- Create a vibrant and walkable downtown area through the increase of intensity of use and the reconfiguration of Main Street;
- Establish a progressive and comprehensive multimodal transportation system that serves the needs of residents, employees, and visitors in a way that is connected, accessible, and safe;
- Promote integration with land use, efficient management of infrastructure, and "greening" measures to reduce water quality and greenhouse gas impacts associated with vehicle use ; and
- Contribute to a healthy economy through the development of an efficient and balanced transportation system that optimizes the movement of people and goods and efficiently manages infrastructure and resources.

C. ALTERNATIVES SELECTED FOR ANALYSIS

The No Project Alternative is included pursuant to CEQA Guidelines Section 15126.6(e). Under the No Project Alternative, the Land Use Element/Zoning Code Amendments and the Mobility Element Update would not be adopted and future development would occur as under the existing General Plan, Zoning Code, and Mobility Element. Other alternatives were selected to identify ways of reducing or avoiding impacts associated with aesthetics, air quality, parks and recreation, traffic, and other environmental issues.

The following alternatives were selected:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Intensity Alternative
- Alternative 3: Mobility Element Update Without the Main Street Reconfiguration

The Reduced Intensity Alternative (Alternative 2) would reduce the estimated intensity of development within the commercially designated areas and would implement the Mobility Element Update. Rather than a

2.0 FAR, Alternative 2 would amend the Land Use Element and Zoning Code to allow a maximum of 1.5 FAR. Alternative 3 would also provide for the Mobility Element Update, but without the reconfiguration of Main Street, and would include the Land Use Element and Zoning Code Amendments.

D. ALTERNATIVES CONSIDERED AND REJECTED

CEQA Guidelines Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible are discussed below.

1. Land Use Element/Zoning Code Amendments to Allow 2.5 FAR

An early study of the proposed Land Use Element/Zoning Code Amendments evaluated the removal of the unit and room cap and the use of a 2.5 FAR within the approximately 122-acre commercially designated (i.e., C-1 and C-2) areas. A land use inventory was conducted of the Study Area to identify parcels where development would likely occur within the timeframe of the General Plan. Potential future uses and buildout potential for these parcels was determined and the commercial square footage, number of dwelling units, and number of hotel rooms estimated for buildout were calculated based on a series of assumptions. The projections were compared with the 2011 Mammoth Lakes Economic Forecast and Revitalization Strategies (EPS) Study, which provided buildout projections under the adopted General Plan. After reviewing various iterations of the potential buildout using a 2.5 FAR, comparing the numbers with other projections including the EPS Study and the General Plan EIR, as well as gaining input from the Town's traffic consultant, it was determined that the potential number of dwelling units and hotel rooms that could occur with up to a 2.5 FAR would be significantly higher than anticipated. In particular, the amount of commercial development was considered not viable as it could not be supported economically. Therefore, the development under the 2.5 FAR was not considered consistent with the Project's purpose and objectives and would further be infeasible because of potentially unacceptable environmental effects.

2. Land Use Element/Zoning Code Amendments Only (No Mobility Element Update)

A potential alternative that would include the Land Use Element/Zoning Code Amendments, but not the implementation of the Mobility Element Update, was considered at the beginning of the review process. However, because the Mobility Element Update is intrinsic to the intent of the Land Use Element/Zoning Code Amendments to increase density, pedestrian activity, and the character of the Main Street and Old Mammoth Road commercial districts, this alternative was rejected.

E. ANALYSIS FORMAT

In accordance with *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

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- A description of the alternative.
 - The net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described.
 - Post-mitigation and non-significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be “less.” Where the alternative’s net impact would clearly be more than the Project, the comparative impact is said to be “greater.” Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.” The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
 - The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the section a relative comparison of the alternative’s impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an “Environmentally Superior Alternative” is identified.

F. ALTERNATIVES ANALYSIS

1. ALTERNATIVE 1: NO PROJECT ALTERNATIVE

A. DESCRIPTION OF THE NO PROJECT ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project Alternative represents the circumstance under which the Project does not proceed. For the purpose of this analysis, the No Project Alternative (Alternative 1) assumes that the proposed Land Use Element/Zoning Code Amendments would not occur. Thus, future development would occur in accordance with the existing General Plan and Zoning Code requirements in the commercial zones. Currently, the General Plan and Zoning Code allow an FAR of 2.5 with a limit of 12 residential units per acre and 40 lodging rooms per acre in C-1 and C-2 designated areas, and in the MLR, D, and OMR zoning districts. Policy L.5.G. of the General Plan allows a doubling of density (up to 80 rooms per acre) for hotel, motel, and similar transient lodging projects in the C-1 and C-2 designated areas through the Community Benefits/Incentive Zoning policy (CBIZ policy).⁴ In October 2014, the Town Council eliminated the CBIZ policy (Policy L.5.G) so that this mechanism for increasing density is no longer available. In addition, future development in the Town's commercially designated areas (comprising approximately 122 acres), including a minimum level 0.75 FAR and maximum 2.0 FAR with no unit cap, as proposed by the Project, would not be implemented. The affected area would maintain the same unit and room cap as under current conditions. It is anticipated, however, that because the Project would provide greater development flexibility, the No Project Alternative is less likely to result in new development to the extent currently permitted.

The No Project Alternative would, however, implement current land use and design policies of the Zoning Code Update, including street frontage improvements in accordance with adopted Town Plans (i.e. Pedestrian Master Plan, Bikeway Master Plan, etc.), including but not limited to sidewalks, bike lanes, paths, bus stops, and other typical frontage improvements (Sec. 17.24.030). Under this code section, where feasible, the property frontage shall be improved to provide a wider public sidewalk and space for landscaping, public art, and/or pedestrian amenities such as outdoor seating. Section 17.24.030.E requires the placement of buildings as close to the street as possible, with parking underground, behind a building, or on the interior side or rear of the site. Under Section 17.24.030.F, properties fronting Main Street may claim an existing frontage road, but must incorporate a re-routed access road to the rear of the property. Section 17.24.040.B, requires that all buildings located on a public street shall be oriented toward, and have their primary entrances facing the public street; building entrances must emphasize special architectural, roof lines or landscape treatments; and building entrances must be designed to not shed snow freely into entrances to minimize the buildup of ice and snow in pedestrian areas. Section 17.24.040.C requires transparency and openings along the sidewalk for commercial buildings. Section 17.24.040 D requires that buildings be designed to create a pedestrian-friendly environment and support a vital and active public realm. Section 17.24.040 F requires development to provide direct and convenient pedestrian access between commercial and residential uses to the extent feasible and provide convenient pedestrian connections from transit stops to building entrances.

⁴ *CBIZ was intended to be a "bridge" between the General Plan and the District Planning work and was adopted by Resolution 09-55 approved by the Town Council in 2009.*

Under the No Project Alternative, the proposed methodology for projecting buildout for the Town would not be implemented. Policy L.1.A of the General Plan, which states: *“Limit total peak population of permanent and seasonal residents and visitors to 52,000 people,”* would remain in effect to describe population intensity throughout the Town. The categories for units would remain as it currently is with reference to permanent units, transient units, seasonal units and second homes. With the maximum density limitations in place, a transfer of development rights may be desired by the Town. As such, no revisions would be made to the General Plan Land Use Element regarding transfer of development rights (TDR). Thus, no revision would be made to Policy L.3.H and Action L.3.H.1 of the General Plan.

Under the No Project Alternative, the Mobility Element Update would not be adopted. The No Project Alternative, however, would not prevent any ongoing roadway, pedestrian, bicycle, and transit improvements, such as those consistent with the approved Pedestrian, General Bikeway, and Trails System Master Plans. However, the No Project Alternative would not be consistent with the Town’s July 2009 Agenda Bill to further articulate the goals, policies, and actions of the General Plan Mobility Element, which is “intended to serve as the implementation document and to carry forward previous Town transportation planning efforts and consolidate them into one comprehensive transportation planning document.” According to the Agenda Bill, “The Town of Mammoth Lakes Mobility Plan will enable Mammoth Lakes to realize the Vision and Goals outlined in the 2007 General Plan Mobility Element.” The Agenda Bill further states, “the adoption of the Mobility Element Update will place the Town in a better position to achieve its desired objectives related to becoming a community that is more ‘connected, accessible, uncongested and safe with an emphasis on feet first, public transportation second and car last.’ An adopted Mobility Plan will provide a cohesive program of transportation system improvements and recommendations that will assist decision-makers, the public, Town staff, and developers in planning projects in a manner that will ultimately lead to a complete and integrated multi-modal system for the community.”

The No Project Alternative would not implement the Mobility Element Update, which would meet the objectives of the 2007 General Plan to achieve a progressive and integrated multi-modal transportation system, one that emphasizes “feet first, public transportation second, and car last.” In addition, without Mobility Element Update, the No Project Alternative would not be consistent with the California Complete Streets Act (AB 1358). AB 1358 requires that municipalities craft a specific network of travel options through an adopted General Plan circulation element. Under AB 1358, the circulation element must reflect land use patterns that further support the effectiveness of a multimodal transportation network. In addition, the No Project Alternative would not be consistent with AB 743, which is intended to support residential/mixed-use densification for the purpose of inducing greater pedestrian and other multi-modal activity and, thus, reduce vehicle miles. Because the proposed Mobility Element Update would expand upon the Town's adopted Mobility Element, focus on multi-modal transportation, and provide specificity as required under AB 1358, the adoption of the Mobility Plan Update would engender regional and state confidence with respect to funding. A more secure funding source would further ensure future roadway, pedestrian, and transit improvements. Although street improvements would continue under the No Project Alternative, in the absence of the Mobility Element Update, the vision and goals of the General Plan and statewide transportation goals would not be met.

B. ENVIRONMENTAL IMPACTS

1. Aesthetics/Visual Resources

a. Scenic Vistas and Resources

Under the No Project Alternative, development in the Town's commercial zones would continue to conform to existing zoning and height regulations. Under both the No Project Alternative and the Project, the Code would limit buildings in the Downtown (D) zone to a maximum height of 55 feet, buildings in the Old Mammoth Road (OMR) zone to a maximum height of 45 feet, and buildings in the Mixed Lodging/Residential (MLR) zone to a maximum height of 45 feet for lots with less than 10 percent slope and 55 feet for lots with slopes 10 percent or greater. Under the Land Use Element/Zoning Code Amendments, view impacts were identified as less than significant because building heights and envelopes would be the same as under existing Code requirements. As with the Project, the No Project Alternative would not result in new blockage of ridgelines or conflict with General Plan standards that maintain panoramic views of the Sherwin Ridge or Mammoth Rock. As such, the No Project Alternative would have similar, less than significant impacts on scenic vistas.

The implementation of the Mobility Element Update's Main Street Plan, however, has the potential to narrow Main Street from approximately 200 feet to 130 feet, while locating buildings closer to the street as required under the existing Zoning Code Update (17.24.030.E). Panoramic views of Mammoth Mountain from the Main Street corridor would be incrementally narrower, although less than significant since public views would remain. Although the Project's impact on the view corridor would be less than significant, because the Main Street Plan would not be implemented under the No Project Alternative, the street corridor would not be narrowed to the same extent. As such, the No Project Alternative would avoid any potential scenic vista impacts associated with buildings fronting a narrower street corridor and would have less impact on scenic vistas from the Main Street corridor than under the Project.

b. Visual Character and Quality

The No Project Alternative would result in less construction than under the Project because the increased density within the Town's commercial areas, compared to the 2007 General Plan buildout, would not occur. In addition, the No Project Alternative would not fully implement the street and trail improvements as under the Mobility Element Update. The No Project Alternative would not involve the vacation of the frontage road that parallels Main Street, installation of new landscaping, street crossing improvements, on-street bike lanes, trails, and the provision of amenities as funding becomes available contained in the Mobility Element Update. Future construction activities under both the No Project Alternative and the Project could require excavation and the use of heavy machinery, hauling, temporary stockpiling, and possible scrubbing and clearing of vegetation. These activities could cause temporary degradation of visual quality. Visual impacts could also be exacerbated if several projects were to be under construction concurrently. Although short-term impacts would be mitigated to a less than significant level under the Project, the scope of short-term construction impacts would be incrementally less under the No Project Alternative. Therefore, the No Project Alternative would reduce the Project's visual quality short-term construction impacts.

As with the Project, the No Project Alternative would implement Zoning Code Update design requirements aimed at creating a more pedestrian oriented environment, such as a build-to-street line, placement of parking away from the street, wider public sidewalk and space for landscaping, public art, and/or pedestrian

amenities such as outdoor seating, design of building entrances to emphasize special architectural, roof lines or landscape treatments, and required transparency and openings along the sidewalk for commercial buildings. As such these benefits would be the same under both the No Project Alternative and the Project. In addition, both the No Project Alternative and the Project would have the same maximum building height standards. The No Project Alternative, however, would not upgrade the appearance of Main Street through the vacation of the frontage road and implementation of improvements under the Main Street Plan. As such, the No Project Alternative would contribute minimally to the improved appearance of Main Street. The No Project Alternative would also not intensify development along the commercial corridors, which would, otherwise, contribute to the aesthetic vibrancy of the streets associated with greater activity. Because the No Project Alternative would not provide aesthetic benefits to the same degree as the Project, it is considered to have a greater impact with respect to long-term visual character than under the Project. However, as with the Project, impacts under the No Project Alternative, would be deemed less than significant.

c. Light and Glare

Under the No Project Alternative, the Town of Mammoth Lakes Outdoor Lighting Ordinance, which regulates nighttime lighting, would be enforced as under existing conditions. No new street lighting associated with implementation of the Mobility Element Update would occur. Any new development under the No Project Alternative and Land Use Element/Zoning Code Amendments and Mobility Element Update would be subject to the Outdoor Lighting Ordinance and would have a less than significant impact with respect to light and glare. However, because the No Project Alternative may not entail the same extent of street improvements anticipated under the Mobility Element Update, or potentially result in additional signage and light spillage associated with denser street-front commercial development than under development that could occur under existing conditions, it is considered to have less impact with respect to light and glare. Therefore, light and glare impacts would be less under the No Project Alternative compared to the Project.

d. Shade/Shadow

Under the No Project Alternative, as with the implementation of the Land Use Element/Zoning Code Amendments, code development standards such as height, setbacks, parking requirements, and lot coverage would not change. As required under the Code, maximum building height would be 55 feet in the D zone, and 45 feet in the OMR and MLR zones (with a 55-foot maximum in MLR zones with slopes greater than 10 percent). However, implementation of the Mobility Element Update would result in a reduction in the right-of-way width along Main Street, allowing for future buildings to be located approximately 35 feet closer to Main Street than under existing conditions. Under the Mobility Element Update, buildings at the new property line along Main Street would increase the amount and duration of shadows along Main Street, which could result in ice buildup. The Project includes a mitigation measure to reduce potential ice buildup through coordinated snow removal. Because the No Project Alternative would not cause additional shading respective to existing conditions, it would avoid this impact and not require mitigation.

2. Air Quality

The No Project Alternative would not generate any development projects that are not anticipated under the 2007 General Plan Update buildout. However, the EIR for the 2007 General Plan Update did not evaluate individual projects, so individual projects would be subject to CEQA requirements. Construction and operation related impacts of development projects under the No Project Alternative would result in potentially significant air quality impacts with regard to air quality, especially PM₁₀ and PM_{2.5}, similar to the

Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update. Although implementation of the adopted mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) would reduce air quality impacts, construction and operation impacts under the No Project Alternative would still be significant and unavoidable as with the Project. Impacts related to localized CO concentrations and toxic air contaminants would be similar to the Project and would remain less than significant. Implementation of the No Project Alternative would not conflict with any applicable air quality management plans and, similar to the Project, impacts would remain less than significant. The No Project Alternative could potentially contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment (i.e., PM₁₀) under the State standards. The No Project Alternative would be similar to the Land Use Element/Zoning Code Amendments alone and the Project, which would result in significant and unavoidable impacts. The No Project would generate a greater impact than the Mobility Element Update alone which would result in less than significant PM₁₀ impacts.

3. Forestry Resources

The proposed Land Use Element/Zoning Code Amendments are applicable to the Town's commercial districts and would not affect forest lands. The No Project Alternative would not implement the Mobility Element Update and, as such, would not provide for the extension of new roads into forested areas to the north of Main Street. Thus, the No Project Alternative would have no impact with respect to these roadway extensions. However, the Trails System Master Plan (TSMP), which establishes standards and routes for multi-use-paths (MUPs) within Inyo National Forest lands, would be implemented under the No Project Alternative, as set forth under the TSMP. The implementation of the TSMP was determined to have a less than significant impact on forestry resources. However, because the No Project Alternative would not impact forestry resources to the north of Main Street under the Mobility Element Update, it would have incrementally less impact on forestry resources compared to the Project.

4. Biological Resources

Under the Project, buildout of vacant parcels and construction of road improvements and MUPs may affect wetlands and/or other jurisdictional features through potential dredging and filling activities. In addition, Project-related construction and maintenance activities could occur within habitats that support several special-status plant and wildlife species. In such cases, the loss of wetlands and/or other jurisdictional features or habitat and individuals of special-status species as well as migratory birds would be considered potentially significant. Compliance with mitigation measures and applicable policies in the General Plan would reduce impacts to wetlands, habitat, special-status plant and wildlife species and migratory birds to a less than significant level. Under the No Project Alternative, some road and trail development would still go forward and similar impacts on biological resources would occur and need to be mitigated. However, because it is likely that the development of trails and road extensions would not occur to the same extent as under the Project, the No Project Alternative would have less impact on biological resources compared to the Project.

5. Cultural Resources

Buildings considered to be potential historical resources are located within the Land Use Element/ Zoning Code Amendments project area and several known historic resources have been recorded within or in the immediate vicinity of the Mobility Element Update area. It is possible that additional historic resources are

present within the Project Areas that have yet to be evaluated for eligibility for listing in the local, State, and/or federal registers. In addition 86 archaeological or historical resources are located within or in the immediate vicinity of the Mobility Element Update area while six resources are located within or in the immediate vicinity of the Land Use Element/Zoning Code Amendments project area. Components of the Project that include excavations into native soils or sediments would have the potential to impact these resources or additional archaeological resources within the Project Area that have yet to be discovered. Under the Project, the implementation of the TSMP and General Plan mitigation measures applicable to cultural resources would reduce potential impacts to less than significant levels. The No Project Alternative could result in the development of vacant properties in the Town's commercial districts as well as redevelopment of some parcels. Therefore, the No Project Alternative could result in potential impacts similar to the Project. The No Project Alternative would also potentially result in trail development and some road development, which would impact cultural resources the same as under the Project. However, because it is likely that the development of trails and road extensions would not occur to the same extent as under the Project, the No Project Alternative would have incrementally less impact on cultural resources than the Project.

6. Greenhouse Gas Emissions GHG

The No Project Alternative would not result in any development projects that are not anticipated under the 2007 General Plan Update buildout. However, the EIR for the 2007 General Plan Update did not evaluate individual projects and future projects would be subject to their own CEQA requirements. Construction and operation related impacts of development projects under the No Project Alternative would not generate GHG emissions, either directly or indirectly, that would result in a significant impact on the environment similar to the Project. The No Project Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions similar to the Project. As with the Project, GHG impacts would remain less than significant with the No Project Alternative.

7. Land Use

The No Project Alternative would not conflict with applicable objectives of the Land Use Element of the General Plan, and Title 17 of the Municipal Code, or other Town plans and policies. The No Project Alternative would not result in the amendments of the Land Use Element or involve the adoption of the Mobility Element Update. However, the No Project Alternative would not implement objectives of the Land Use Element to enhance livability of districts for walking through the arrangement of land uses and development intensities (Goal L.3), to develop vital retail centers and streets (Policy L.3.B), or to provide an overall balance of uses, facilities, and services to further the town's role as a destination resort community (Goal L.5) to the same extent as the Project since the intensity of development would not be clustered in the downtown area.

The No Project Alternative would not implement the goals of the current General Plan Mobility Element to develop and implement a townwide way-finding; to improve regional transportation system; to emphasize feet first, public transportation second, and car last in planning the community transportation system while still meeting level of service standards; to encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive; to provide a year-round local public transit system that is convenient and efficient; to encourage alternative transportation and improve pedestrian mobility by developing a comprehensive parking management strategy; to maintain and improve safe and efficient movement of people, traffic, and goods in a manner consistent with the feet first initiative; or to

enhance small town community character through the design of the transportation system to the same extent as the proposed Mobility Element Update.

In addition, the No Project Alternative would not meet the objectives of AB 1358, which requires that municipalities focus on crafting a specific network of travel options through the adoption of a General Plan circulation element that reflects land use patterns that increasingly support a multimodal transportation network. The No Project Alternative would also not be consistent with AB 743, which supports densification and multi-modal activity to reduce vehicle miles.

Therefore, because the No Project Alternative would not implement the current goals of the General Plan to the same extent as the Project or comply with AB 1358 to adopt a element that addresses specific complete street improvements and land use supporting multi-modal transportation, or AB 743 to encourage densification and multi-modal transportation to reduce vehicle miles, it is considered to have a more adverse or greater land use impact than under the Project. However, because it would not cause any direct conflicts with the General Plan, impact levels would be less than significant.

8. Noise

The No Project Alternative would not generate any development projects that are not anticipated under the 2007 General Plan Update buildout. However, the EIR for the 2007 General Plan Update did not evaluate individual projects, so individual projects would be subject to CEQA requirements. Construction-related impacts of development projects under the No Project Alternative would result in less than significant noise impacts, inclusive of compliance with applicable regulations and policies and implementation measures, similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update, which would result in less than significant noise impacts with the implementation of mitigation measures. Operational impacts under the No Project Alternative would result in less than significant impacts, primarily due to roadway traffic noise, with the implementation of mitigation measures, similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update. The No Project Alternative would result in less than significant groundborne vibration and groundborne noise impacts and no mitigation would be required, similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update.

9. Population/Housing

The No Project Alternative would not result in any direct population or housing growth over that provided under existing zoning and density estimates. Because the estimated maximum buildout over the time period addressed within the General Plan would be sufficient to accommodate projected growth under the Land Use Element/Zoning Code Amendments, the Project, which would generate a population increase of approximately 1,978 people, calculated according to the proposed methodology of persons per unit, is considered to have a less than significant impact with respect to population and housing. However, because the No Project Alternative would have no impact with respect to General Plan growth projections, it would have less impact than under the Project.

10. Public Services

a. Fire Protection

The No Project Alternative would not increase population over current projections. As such, it would have no impact with respect to service ratios related to fire services. Unlike the proposed Land Use Element/Zoning Code Amendments and Mobility Element Update, the No Project Alternative would not necessarily improve multimodal access or improve emergency access. However, because the No Project Alternative would also not include the reconfiguration of Main Street it would not cause temporary lane closures or other access issues affecting emergency response times during construction. The No Project Alternative would also not result in the Project's incremental increase in demand for fire services. Impacts related to fire services demand and emergency access during construction and operation under the Project are determined to be less than significant. However, because the No Project Alternative would not implement the Mobility Element Update, it would not provide for improved, Townwide connectivity as under the Project. Therefore, although both the No Project Alternative and the Project would result in less than significant impacts on fire services and emergency access, impacts with respect to fire emergency services would be considered greater under the No Project Alternative.

b. Police Protection

The No Project Alternative would not result in greater hotel and residential densities or incremental population gain in commercial areas over current projections, or generate an incremental increase in population that could result in greater demands for police services, compared to the Project. As discussed in Section 4.10.2, Police Services, of this EIR, the Town recently approved funding and the construction of a new police facility with a planned completion date of December 2017 and Development Impact Fees (DIFs) would further ensure that potential impacts to police protection services would be reduced. As such, impacts to police services under the Land Use Element/Zoning Code Amendments and Mobility Element Update are considered to be less than significant. However, since the No Project Alternative would not result in additional population growth over current General Plan buildout and would have a less than significant impact without mitigation, it is considered to have less impact with respect to police services than under the Project.

c. Schools

The No Project Alternative would not increase residential densities within the Main Street and Old Mammoth Road neighborhoods compared to existing projections and, as such, would not introduce more people than currently anticipated to these areas. It is estimated that the Land Use Element/Zoning Code Amendments could result in an additional 136 new students than would result under the No Project Alternative. Although it is not expected that the introduction of residential densities would result in a substantial fluctuation in enrollment, and developer fees applicable at a building permit application would reduce the Project's impacts on schools to a less than significant level, the No Project Alternative would not result in greater residential densities than those anticipated under the adopted General Plan. As such, the No Project Alternative would have comparatively less impact relative to schools.

d. Parks and Recreation

The No Project Alternative would not increase demand for parks and recreational facilities over that anticipated under the General Plan buildout. The Town's Parks and Recreation Master Plan (PRMP) reflects

the General Plan’s objectives to develop more park and recreational facilities to serve the Town. The Town currently does not meet its own standard of 5 acres of local parks or 2.5 acres of regional parks per 1,000 people. Although the No Project Alternative does not provide for additional parkland other than that envisioned under the General Plan, it would not generate an incremental increases in population and, unlike the Project, would not cause a significant parks and recreational resources impact. As such, the No Project Alternative would avoid the Project’s significant and unavoidable impact on parks and recreational resources.

11. Transportation and Traffic

The No Project Alternative would generate trips that are anticipated under the 2007 General Plan buildout. The No Project Alternative would not result in significant impacts that would require mitigation which would occur with the implementation of the Land Use Element/Zoning Code Amendments and/or the Mobility Element Update. Implementation of the recommended mitigation measures would reduce potentially significant LOS impacts at all affected intersections under all Project scenarios. However, because Caltrans must approve signal warrant analyses on Main Street, if not approved the potentially significant impacts at Main Street intersections under the Project (Scenarios 3 through 6) would be considered significant and unavoidable. The No Project Alternative is identical to Scenario 3 in that it represents the buildout of the 2007 General Plan with no additional growth. Scenarios 4 through 6 represent a combination of the Land Use Element/Zoning Code Amendments and Mobility Plan Update. As shown in **Table 5-1, Significant LOS Impacts - Comparison of the No Project Alternative to the Project**, the No Project Alternative would avoid the Project’s LOS impacts at a four study intersections. However, as with the Project, the No Project Alternative would result in significant impacts at two study intersections: Main Street/Mountain Boulevard and Old Mammoth Road/Minaret Road/Fairway Drive. Although traffic impacts would be reduced to less than significant levels with mitigation, because the mitigation measure (traffic signal) at Main Street/Mountain Boulevard must be approved by Caltrans, and approval is still unknown, this impact, as with the Project’s impact is considered significant and unavoidable. Because the No Project Alternative would avoid the Project’s other significant and unavoidable impacts on Main Street, it is considered to have less impact with respect to LOS than under the Project.

Table 5-1

Significant LOS Impacts – Comparison of the No Project Alternative to the Project

No.	Impacted Intersection	Project	No Project Alternative
3	Main Street/Mountain Boulevard	X	X
4	Main Street/Post Office	X	
6	Main Street/Forest Trail	X	
7	Main Street/Laurel Mountain Road	X	
12	Old Mammoth Road/Sierra Nevada Road	X	
19	Old Mammoth Road/Minaret Road/Fairway Drive	X	X

Source: LSC Transportation Consultants, 2016.

Under the No Project Alternative, the Mobility Element Update would not be adopted. The No Project Alternative, however, would not prevent any ongoing roadway, pedestrian, bicycle, and transit

improvements, such as those consistent with the approved Pedestrian, General Bikeway, and Trails System Master Plans. However, the No Project Alternative would not be consistent with the California Complete Streets Act (AB 1358), which requires that municipalities craft a specific network of travel options through an adopted General Plan circulation element. Under AB 1358, the circulation element must reflect land use patterns that further support the effectiveness of a multimodal transportation network. In addition, the No Project Alternative would not be consistent with AB 743, which is intended to support residential/mixed-use densification for the purpose of inducing greater pedestrian and other multi-modal activity and, thus, reduce vehicle miles. Because the proposed Mobility Element Update would expand upon the Town's adopted Mobility Element, focus on multi-modal transportation, and provide specificity as required under AB 1358, the adoption of the Mobility Plan Update would engender regional and state confidence with respect to funding. Because the No Project Alternative would not implement the Mobility Element Update, it would be considered to have a greater transportation impact with respect to State legislation than the Project.

12. Utilities

a. Water Supply

(1) Infrastructure

The No Project Alternative would not result in greater hotel and residential densities or incremental population increases over current zoning designations in the Main Street and Old Mammoth Road commercial district. Under the Land Use Element/Zoning Code Amendments, more concentrated growth could occur in these areas than under the No Project Alternative, and would result in potentially significant effects relative to the capacity of local water mains. With the payment of development fees to support necessary new or upgraded water mains and other water infrastructure, impacts to water conveyance systems under the Land Use Element/Zoning Code Amendments are considered less than significant. However, the No Project Alternative would cause no new concentrations of growth compared to existing anticipated conditions and, as such, would have no new impact on water conveyance systems. Therefore, the No Project Alternative would result in less impact than under the Project.

(2) Water Supply

As indicated, the No Project Alternative would not generate additional population over current General Plan buildout projections. As such, the No Project Alternative would not cause an increase in water demand relative to the Mammoth Community Water District's (MCWD's) 2010 Urban Water Management Plan (UWMP). Although the incremental increase in water demand under the Land Use Element/Zoning Code Amendments would not exceed UWMP's 2030 projections and would be less than significant, because the water demand under the No Project Alternative would be incrementally less, the No Project Alternative would have less impact on water supply than under the Project.

b. Wastewater

(1) Infrastructure

The No Project Alternative would not result in greater hotel and residential densities or incremental population gain in commercial areas over current projections. The Land Use Element/Zoning Code Amendments have the potential to generate an increase of approximately 1,978 people using proposed buildout methodology. The projected increase under the Project would be concentrated in the Town's

commercially-designated properties in the vicinity of Main Street and Old Mammoth Road. This increase has the potential to exceed the capacity of the existing lines serving the Town's commercial districts or to adversely impact any downstream sewer line capacities or deficiencies. Under the Land Use Element/Zoning Code Amendments, impacts to sewer lines would be addressed by the Sanitary Sewer Code, under which no building permits would be issued for uses that would exceed the capacity of specific sewer lines, and through Mitigation Measure WW-1, which requires the applicant for any building permit to install improvements that would comply with Division VII of the Sewer Code. As such, impacts to sewer lines would be less than significant. However, because the No Project Alternative would not result in population concentrations in the Main Street and Old Mammoth Road commercial districts, it would have no incremental or unanticipated affect on existing lines. Therefore, impacts to sewer lines would be less under the No Project Alternative.

(2) Wastewater Treatment

The No Project Alternative would not result in the incremental population increase of approximately 1,978 people that could occur with the proposed Land Use Element/Zoning Code Amendments. Under the No Project Alternative, the UWMP's projected wastewater treatment demand at buildout of 2,330 AFY would not change. The proposed Land Use Element/Zoning Code Amendments would incrementally increase wastewater treatment to approximately 2,517 AFY, which would be less than the MCWD's estimated treatment capacity of 5,488 AFY or 4.9 mgd. As such, MCWD's waste treatment facilities have sufficient capacity to accommodate the estimated growth under the proposed Land Use Element/Zoning Code Amendments. In addition, the MCWD has the authority to disallow development under the Sanitary Sewer Ordinance if capacity is not available. Although the Land Use Element/Zoning Code Amendments would have a less than significant wastewater impact, because the No Project Alternative would not result in incremental population increase over the anticipated current General Plan buildout, it would have less impact with respect to wastewater treatment than under the Project.

c. Stormwater

The No Project Alternative would not impede development in the commercial districts and under this alternative there is the potential that vacant parcels would be developed with building foundations, driveways, and other paved surfaces in the commercial districts. The Town's drainage systems were identified in the 2015 Stormwater Management Plan (SMP) as potentially deficient, and any development has the potential to affect stormwater facilities. As under the Land Use Element/Zoning Code Amendments, the No Project Alternative would reduce stormwater impacts through drainage impact fees, design measures such as landscaped buffers and infiltration devices. Unlike the Project it would not implement Mitigation Measure MM STRM-1, which would require the determination of peak surface runoff for all private projects and implementation of suitable infiltration devices. Because the No Project Alternative would not implement MM STRM-1, it would potentially have a greater impact on stormwater facilities than would occur under the Project. However, impacts would be less than significant under both the No Project Alternative and the Land Use Element/Zoning Code Amendments. The Project's Mobility Element Update also has the potential to increase surface runoff and increase flow into the Town's storm drain system. New road construction would require consistency with the Department of Public Works' Standards and all new public streets, sidewalks, and trails projects must provide drainage facilities. Mitigation measures for the Trails System Master Plan and the Town's Standards for public works projects would reduce potential adverse impacts of the Mobility Element Update on the Town's existing drainage system to a less than significant level. However, under the No Project Alternative, it is assumed that new street extensions would not be developed and, as such, effects on stormwater collection systems would be less than under the Mobility Element Update.

d. Solid Waste

The No Project Alternative would not generate an incremental increase in solid waste that is, otherwise, expected under the Project. Compared to the Project, the No Project Alternative represents a reduction of approximately 2,387 tons of additional solid waste per year that could occur under the Land Use Element/Zoning Code Amendments. The current landfill, Benton Crossing Landfill, is scheduled for closure. However, the County is exploring options and anticipates future alternative sites. In addition, with increasing diversion techniques to reduce the waste stream and the conclusion of the County General Plan Update that determined that impacts on solid waste facilities would be less than significant, it is expected that the Project would have a less than significant impact relative to solid waste facilities. In addition, the Town will continue to operate waste collection and recycling to increase the statewide recycling rates to 75 percent by 2020. Although the Project would result in an increase in population in the Town's commercial districts, it would be consistent with applicable federal, state and local policies and regulations regarding solid waste and the geographic concentration of population could allow the efforts to increase diversion that are put into place to be more successful. Impacts under both the Project and the No Project Alternative would be less than significant. However, because the No Project Alternative would not generate a population increase over the projected General Plan buildout, it would have less impact than the Project with regard to solid waste disposal and applicable statutes and regulations related to solid waste.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

With the exception of the intersections of Main Street/Mountain Boulevard and Old Mammoth Road/Minaret Road/Fairway Drive, the No Project Alternative would avoid the Project's potentially significant LOS impacts. Although LOS impacts would be mitigated to less than significant levels, as with the Project, the LOS impact at Main Street and Mountain Boulevard would be potentially significant and unavoidable unless signalization of the intersection is approved by Caltrans. The No Project Alternative would incrementally reduce but not avoid the Project's significant and unavoidable air quality impacts and significant and unavoidable impacts with respect to parks and recreational facilities. Under the No Project Alternative, impacts associated with forestry resources, biological resources, cultural resources, noise, fire services, police services, schools, water supply, wastewater, stormwater, and solid waste would be less than under the Project. However, because the No Project Alternative would not add to mixed-use development in the Town's pedestrian-oriented areas over the growth contemplated in the General Plan buildout, it would contribute less concentrated activity, walkability, and less vibrancy to the street fronts. Therefore, it is considered to have greater visual character and land use impacts than under the Project. While the Reduced Intensity Alternative would result in less overall impact than the Project, it would not meet the Project's primary objectives. It would not provide for the Land Use Element/Zoning Code Amendment to achieve flexibility in the commercial districts through the removal of the unit/room cap. The No Project Alternative would not increase density or create a vibrant and walkable downtown area to the same extent as the Project. The No Project Alternative would not amend the Land Use Element policy and text associated with regulating population growth from a PAOT approach to an impact assessment based approach consistent with Town Council direction in 2009; delete the CBIZ and modify TDR policies and, as such, would not meet the Town's objective to streamline the planning process to encourage economic development. Because the No Project Alternative would not adopt the Mobility Element Update, it would not meet the objective to create a downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles traveled to the same extent as the Project.

F. ALTERNATIVES ANALYSIS

2. ALTERNATIVE 2: REDUCED INTENSITY ALTERNATIVE

A. DESCRIPTION OF THE REDUCED INTENSITY ALTERNATIVE

Under Alternative 2, Reduced Intensity Alternative, the Land Use Element/Zoning Code Amendments would result in a maximum 1.5 FAR in the commercially designated districts and the Mobility Element Update would be implemented. **Table 5-2, *Reduced Intensity Alternative - Summary of Proposed Land Use Changes within the Commercial Designations***, summarizes the changes that could occur from the proposed change within commercially designated areas with a 1.5 FAR and the removal of the cap in rooms per acre development standards.

Table 5-3, *Reduced Intensity Alternative - Reduction in Uses Compared to the Project*, summarizes the reduction in residential units, lodging, and commercial square footage under the Reduced Intensity Alternatives compared to the Project.

The Reduced Intensity Alternative would result in incrementally less development than would occur under the Project. As can be seen in Table 5-3, under the Reduced Intensity Alternative, the 1.5 FAR would result in 222 residential units, which represents a reduction of approximately 114 units compared to the Project. The number of rooms that could be developed under the Reduced Intensity Alternative would be up to 213 rooms or up to 254 fewer rooms compared with the Project. The amount of commercial square footage that would be occupied by retail, service, and office uses would be 127,346 square feet or about 25,187 square feet less than under the Project. The Mobility Element Update would contain all the proposed components, including the reconfiguration of Main Street. The purpose of the Reduced Intensity Alternative is to reduce the Project's impacts associated with population increase, including significant traffic and air emissions impacts and less than significant impacts associated with public services, and utilities.

B. ENVIRONMENTAL IMPACTS

1. Aesthetics/Visual Resources

a. Scenic Vistas and Resources

Under the Reduced Intensity Alternative, as with the Project, maximum building heights set forth under the Zoning Code Update, which limit buildings in the D zone to a maximum of 55 feet, in the OMR zone to a maximum height of 45 feet, and buildings in the MLR zone to a maximum height of 45 feet for lots with less than 10 percent slope and 55 feet for lots with slopes 10 percent or greater, would be maintained. Under the Land Use Element/Zoning Code Amendments, view impacts were identified as less than significant because building heights and envelopes would be the same as under existing Code requirements. As with the Land Use Element/Zoning Code Amendments, the Reduced Intensity Alternative would not result in new blockage of ridgelines or conflict with General Plan standards that maintain panoramic views of the Sherwin Ridge or Mammoth Rock.

Table 5-2

**Reduced Intensity Alternative
Summary of Proposed Land Use Changes within the Commercial Designations**

	Residential Units	Lodging Units	Commercial Floor Area
Existing	757 units ^a	537 rooms ^b	1,046,978 square feet ^c
Proposed 1.5 FAR Net Increase	+265 units ^d	+666 rooms ^e	+206,190 square feet ^f
Projected Buildout with 1.5 FAR (Existing + 1.5 FAR Buildout)	1,022 units	1,203 rooms	1,253,168 square feet
Current Regulations Net Increase	43 units ^g	453 to 977 rooms ^h	78,844 square feet ⁱ
Projected Buildout Under Current Regulations (Existing + Current Regulations Buildout)	800 units	990 to 1,514 rooms	1,235,822 square feet
Net Change (Buildout with 1.5 FAR – Buildout Under Current Regulations)	+222 units	+213 room to -311 rooms	+127,346 square feet

^a Residential units – Includes condos, apartments, etc. This category includes all projects that were built according to the 12 units/acre requirement.

^b Lodging units – Includes hotels, motels, B & Bs, etc. This category does not include homes or condos that are used transiently or as second homes. Every room or unit is counted as a whole unit.

^c Commercial Square Feet – Includes square footage in a structure used for any “commercial” purpose, including retail, office, and service. “Commercial” is any use that is not Residential or Lodging. This category includes for example, post office, day care, churches, and storage.

^d This is a net number which is the projected units minus existing units (322 projected units – 74 existing units = 248 net residential units). In addition, this includes the 17 residential units that could be developed as a result of the additional developable land from the vacation of the Main Street frontage road (248 net units + 17 units = 265 units).

^e This is a net number which is the projected rooms minus existing rooms (707 projected rooms – 71 existing rooms = 636 net rooms). In addition, this includes the 30 rooms that could occur as a result of the additional developable land from the vacation of the Main Street frontage road (636 net rooms + 30 rooms = 666 rooms).

^f This is a net number which is the projected square footage minus existing square footage (355,206 square feet – 170,734 square feet = 184,472 square feet). (This assumes that the existing square footage on parcels that would intensify would remain.) In addition, this includes 21,718 square feet that could occur as a result of the additional developable land from the vacation of the Main Street frontage road (183,472 net square feet + 21,718 square feet = 206,190 square feet).

^g This is a net number which is the projected units under current regulations (12 units/acre) minus existing units (117 projected units – 74 existing units = 43 net units).

^h This is a net number which is the projected rooms under current regulations (80 rooms/acre) minus existing rooms (524 to 1,048 projected rooms – 71 existing rooms = 453 to 977 net rooms).

ⁱ This assumes 0.25 FAR on vacant parcels that are considered for mixed use (7.24 acres, as remaining 1.01 acres are assumed to develop with residential use only). In addition, this assumes the existing non-residential square footage would be replaced at the same intensity as existing and assumes no increase of commercial square footage on parcels identified for intensification under the Reduced Intensity Alternative.

Source: Town of Mammoth Lakes and ESA PCR, 2016

As with the Project, the Reduced Intensity Alternative would implement the Main Street Plan through the Mobility Element Update and, as such, has the potential to narrow Main Street from approximately 200 feet to 130 feet. Although panoramic views of Mammoth Mountain from the Main Street corridor would be incrementally narrower, view impacts, as under the Project, would be less than significant since public views would remain. However, the 1.5 FAR, Reduced Intensity Alternative has the potential to result in lower structures, or buildings developed to the height maximum with more open space within the parcel compared with the Project. As such, this Alternative has the potential to maintain broader views over the developed

Table 5-3

Reduced Intensity Alternative Reduction in Uses Compared to the Project

Use	Land Use Element/Zoning Code Amendments (2.0 FAR)	Reduced Intensity Alternative (1.5 FAR)	Unit Difference	Percentage Difference
Residential Units	336 units	222 units	-114 units	33.9% reduction
Lodging (Rooms)	467 units	213 units	-254 rooms	54.4% reduction
Commercial Square Footage	152,533 square feet	127,346 square feet	-25,187 square feet	16.5% reduction

Source: ESA PCR, 2016

area than under the Project. Potentially, therefore, the Reduced Intensity Alternative would have incrementally less impact on scenic vistas than under the Project.

b. Visual Character and Quality

As with the Project, the Reduced Intensity Alternative would remove the existing unit cap, create more development flexibility and, potentially, engender more building development, than under the adopted General Plan buildout. In addition to the construction of buildings, construction activity would include the removal of the frontage road along Main Street, installation of new landscaping, street crossing improvements, on-street bike lanes, trails, and the provision of amenities as funding becomes available. As with the Project, if greater construction activity occurs, future construction activities could require excavation and the use of heavy machinery, hauling, temporary stockpiling, and possible scrubbing and clearing of vegetation. These activities could cause temporary degradation of visual quality. Visual impacts could also be exacerbated if several projects were to be under construction concurrently. As with the Project, these short-term impacts would be mitigated to a less than significant level. Allowed building envelopes would be the same under both the Reduced Intensity Alternative and the Project and, as such, construction visual impacts would be similar.

As with the Project, the Reduced Intensity Alternative would not change existing development standards, policies or design standards of the Zoning Code Update, such as the provision for the placement of buildings as close to the street as possible, with parking underground, behind a building, or on the interior side or rear of the site (Sec. 17.24.030.E); improvements to property frontage to provide a wider public sidewalk and space for landscaping, public art, and/or pedestrian amenities such as outdoor seating (Sec. 17.24.030); design of building entrances to emphasize special architectural, roof lines or landscape treatments (Sec. 17.24.040.B); and required transparency and openings along the sidewalk for commercial buildings (Section 17.24.040.C) and, as such, would not lose these aesthetic benefits.

The Reduced Intensity Alternative, however, would result in approximately 16 percent less commercial floor area, approximately 34 percent fewer residential units, and approximately 54 percent fewer hotel rooms; thereby, reducing mixed-use development within the Main Street and Old Mammoth Road commercial centers. Mixed-use lends to the vibrancy and activity of the street front associated with pedestrian activity and street front commercial uses. Because the Reduced Intensity Alternative would reduce mixed-use, it

could potentially reduce activity along the Town's commercial street fronts compared to the Project and, as such, is considered to have less aesthetic benefit than the Project. As with the Project, visual character and quality impacts would be less than significant; however, because the Reduced Intensity Alternative would contribute less to the mixed-use activity and vibrancy of the street front, it is considered to have a greater visual character impact than under the Project.

c. Light and Glare

Under the Reduced Intensity Alternative, the Town of Mammoth Lakes Outdoor Lighting Ordinance, which regulates nighttime lighting, would be enforced as under existing conditions. New street lighting associated with implementation of the Mobility Element Update would be the same as under the Project; however, commercial development would be approximately 16.5 percent less. This could result in a small decrease in commercial signage compared to the Project. Any new development under the Land Use Element/Zoning Code Amendments and Mobility Element Update would also be subject to the Outdoor Lighting Ordinance and, as with the Project, would have a less than significant impact with respect to light and glare. However, because the Reduced Intensity Alternative would not entail the same extent of development along the Main Street and Old Mammoth Road street fronts, it would have incrementally less light and glare impact than the Project.

d. Shade/Shadow

Under the Reduced Intensity Alternative, as with the implementation of the Land Use Element/Zoning Code Amendments, Zoning Code Update development standards such as height, setbacks, parking requirements, and lot coverage would not change. As with the Project, implementation of the Mobility Element Update would result in a reduction in the right-of-way width along Main Street, allowing for future buildings to be located approximately 35 feet closer to Main Street than under existing conditions. Under the Mobility Element Update, buildings at the new property line along Main Street would increase the amount and duration of shadows along Main Street, which would potentially contribute ice buildup. This impact would be mitigated to a less than significant level under the Project and the Reduced Intensity Alternative. Because new development would occur within the same building envelope (building heights) as under the Project, impacts with respect to shade/shadow would be similar.

2. Air Quality

The Reduced Intensity Alternative would result in more intensive buildout than General Plan buildout with the Mobility Element Update (Scenario 4 of the Traffic Study) and less intensive buildout than the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update (Scenarios 5 and 6, respectively, of the Traffic Study). As with the Project, construction and operation under the Reduced Intensity Alternative would result in potentially significant air quality impacts with regard to air quality, especially PM₁₀ and PM_{2.5}. The air quality impacts would be greater than those of the Mobility Element Update and slightly less than those of the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update. Although, implementation of the recommended mitigation measures would reduce air quality impacts, construction and operation impacts under the Reduced Intensity Alternative would still be significant and unavoidable similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update. The Reduced Intensity Alternative would have significant and

unavoidable impacts which are greater than the Mobility Element Update (without the Land Use Element/Zoning Code Amendments) impacts, which are less than significant.

Impacts related to localized CO concentrations and toxic air contaminants would be similar to the Project, and would remain less than significant. As with the Project, the Reduced Intensity Alternative would not conflict with any applicable air quality management plans and impacts would remain less than significant. The Reduced Intensity Alternative could potentially contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in non-attainment (i.e., PM₁₀) under the State standards similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update resulting in significant and unavoidable impacts, but more than the Mobility Element Update which is less than significant.

3. Forestry Resources

The reduction in intensity of development that would occur under the Reduced Intensity Alternative is applicable to the Town's commercial districts and would not affect forestry resources. As with the Project, the Reduced Intensity Alternative would implement the Mobility Element Update and the MUPs would extend into forested areas along the Mammoth Scenic Loop, multiple paths in the Shady Rest Park area, and around Lake Mary. Because these areas are heavily forested, the development of trails and the roads would result in the removal of forest trees. The final design for the proposed MUPs would comply with TSMM 4.A-3.B, which requires that healthy, native trees would be circumvented or avoided through the design of trail alignments to the extent feasible. As with the Project, implementation of the Mobility Element Update under the Reduced Intensity Alternative would also affect forestry resources on the north of Main Street. Similar mitigation measures that require circumventing or avoiding healthy, native trees through the design of roadway alignments in this area would be implemented under both the Reduced Intensity Alternative and the Project. With mitigation, the impact of the Reduced Intensity Alternative on forestry resources would be less than significant and similar to that of the Project.

4. Biological Resources

Under the Reduced Intensity Alternative, the Mobility Element Update would be adopted and the same affected vacant land in the Town's commercial areas would be developed. Overall development intensity, however, would be incrementally less. As under the Project, buildout of vacant parcels and construction of road improvements and MUPs may affect wetlands and/or other jurisdictional features through potential dredging and filling activities. As with the Project, construction and maintenance activities elements are proposed within habitats that could support several special-status plant and wildlife species. In such cases, the loss of wetlands and/or other jurisdictional features or habitat and individuals of special-status species as well as migratory birds would be considered potentially significant. Compliance with mitigation measures and applicable policies in the General Plan would reduce impacts to wetlands, habitat, special-status plant and wildlife species and migratory birds to a less than significant level. With mitigation, the effect of the Reduced Intensity Alternative on biological resources would be similar to that of the Project and, as with the Project, biological resources impacts would be reduced to a less than significant level.

5. Cultural Resources

Buildings considered to be potential historical resources are located within the Land Use Element/ Zoning Code Amendments project area and several known historic resources have been recorded within or in the immediate vicinity of the Mobility Element Update area. It is possible that additional historic resources are present within the Project Areas that have yet to be evaluated for eligibility for listing in the local, State, and/or federal registers. In addition, 86 archaeological or historical resources are located within or in the immediate vicinity of the Mobility Element Update project area while six resources are located within or in the immediate vicinity of the Land Use Element/Zoning Code Amendments project area. Components of the Project that include excavations into native soils or sediments would have the potential to impact these resources or additional archaeological resources within the Project Area that have yet to be discovered. Under the Project, the implementation of the TSMP and General Plan mitigation measures applicable to cultural resources would reduce potential impacts to less than significant levels. The Reduced Intensity Alternative would apply to the same development areas as under the Project and would result in the same potentially significant impacts on cultural resources. As with the Project, impacts under the Reduced Intensity Alternative would be reduced to less than significant levels through the implementation of TSMP and General Plan mitigation measures. Therefore, impacts under both the Project and the Reduced Intensity Alternative would be similar and less than significant.

6. Greenhouse Gas Emissions GHG

The Reduced Intensity Alternative would result in more intensive buildout than the adopted General Plan but less than the Land Use Element/Zoning Code Amendments would allow. Construction and operation under the Reduced Intensity Alternative would result in less than significant GHG emissions similar to those of the Project. The Reduced Intensity Alternative would not generate GHG emissions, either directly or indirectly, that would result in a significant impact on the environment similar to the Project. The Reduced Intensity Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions similar to the Project. As with the Project, GHG impacts would remain less than significant with the Reduced Intensity Alternative.

7. Land Use

The Reduced Intensity Alternative would not conflict with applicable objectives of the Land Use Element of the General Plan, and Title 17 of the Zoning Code, or other Town plans and policies. As with the Project, the Reduced Intensity Alternative would include the Mobility Element Update and removal of the unit and room cap. As with the Project, the Reduced Intensity Alternative would implement objectives of the General Plan's Land Use Element to enhance livability of districts for walking through the arrangement of land uses and development intensities (Goal L.3), to develop vital retail centers and streets (Policy L.3.B), and to provide an overall balance of uses, facilities, and services to further the town's role as a destination resort community (Goal L.5). However, the Reduced Intensity Alternative would allow up to 1.5 FAR, compared to 2.0 FAR under the Project, and would not result in the same development intensity as under the Project. As such, it would not meet Goal L.3 that encourages development intensities in certain pedestrian areas, to the same extent as the Project.

The Reduced Intensity Alternative would implement the goals of the current General Plan Mobility Element to develop and implement town-wide way-finding; to improve the regional transportation system; to emphasize feet first, public transportation second, and car last in planning the community transportation

system while still meeting Level of Service standards; to encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive; to provide a year-round local public transit system that is convenient and efficient; to encourage alternative transportation and improve pedestrian mobility by developing a comprehensive parking management strategy; to maintain and improve safe and efficient movement of people, traffic, and goods in a manner consistent with the feet first initiative; or to enhance small town community character through the design of the transportation system to the same extent as the proposed Mobility Element Update.

In addition, the Reduced Intensity Alternative would meet the objectives of AB 1358, which requires that municipalities focus on crafting a specific network of travel options through the adoption of General Plan circulation element that reflects land use patterns that increasingly support a multimodal transportation network. The Reduced Intensity Alternative would also be consistent with AB 743, which supports densification and multi-modal activity to reduce vehicle miles.

Because the Reduced Intensity Alternative would implement the goals of the General Plan and comply with AB 1358 to adopt a circulation element that addresses specific complete street improvements and land use supporting multi-modal transportation, and AB 743 to encourage increased residential development in proximity to services and employment (mixed use) and multi-modal transportation to reduce vehicle miles, as with the Project, the Reduced Intensity Alternative would not have a significant land use impact with respect to adopted plans and policies. However, because it would not allow for as much mixed-use as the Project, it would have less land use benefit in meeting the objectives of the General Plan and AB 743.

8. Noise

Under the Reduced Intensity Alternative, construction-related noise impacts would be slightly less than those of the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update given the less intensive buildout. Nonetheless, as with the Project, construction under the Reduced Intensity Alternative would result in less than significant noise impacts with implementation of mitigation measures. Operational noise impacts under the Reduced Intensity Alternative would also be slightly less than those of the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update given the less intensive buildout and slightly reduced traffic levels. Similar to the Project, operation of the Reduced Intensity Alternative would result in less than significant impacts with the implementation of mitigation measures. The Reduced Intensity Alternative would result in slightly less groundborne vibration and groundborne noise impacts than the Project given the less intensive buildout, and like the Project, impacts would be less than significant and no mitigation would be required.

9. Population/Housing

a. Population

As shown in **Table 5-4, Increment of Potential Population Increase for Alternative 2 Calculated Using PAOT and Proposed Methodology**, the Reduced Intensity Alternative would result in an incremental population increase of 1,053 people over the projected General Plan Buildout using PAOT methodology and a population increase of 1,145 people using the proposed methodology. In comparison, the Land Use Element/Zoning Code Amendments are estimated to generate a net population increase of 1,877 (calculated according to PAOT methodology) or 1,978 (calculated under the proposed buildout methodology) over the General Plan

Table 5-4

**Increment of Potential Population Increase for Alternative 2
Calculated Using PAOT and Proposed Methodology**

	Amount	Units	Factor	Potential Increase in Population Capacity
PAOT Methodology:				
Residential Units ^a				
Permanent	167	Units	2.4 ^b	401
Transient	56 ^c	Units	4	224
Hotel	107 ^d	Rooms	4	<u>428</u>
Total	330			1,053
Proposed Methodology:				
Combined Residential, Transient, and Hotel Units	330	Total Units	3.47 ^e	1,145

^a For purposes of this analysis an assumption of 75 percent permanent and 25 percent transient was used for the multi-family residential units based on the proportions by Traffic Analysis Zone (TAZ) in the Traffic Model.

^b A factor of 2.4 was used based on the rate used in the 2007 General Plan.

^c Transient units are estimated to be approximately 25% of the net increase of 222 permanent residential units.

^d The 107 hotel units represents 213 hotel rooms. Consistent with Zoning Code Section. 17.32.110.C.7, hotel rooms, studios and 1-bedroom units are considered one-half of a unit for calculating density.

^e The household population estimate of 3.47 per unit is consistent with population assumptions used in the 2007 General Plan.

Source: ESA PCR Services Corporation, 2016

Buildout. Compared to the Project, the Reduced Intensity Alternative represents a reduction in incremental population growth of approximately 44 percent (PAOT methodology) and 42 percent (proposed buildout methodology). As concluded in Section 4.9, Population and Housing, of this EIR, the estimated maximum buildout over the time period addressed within the General Plan would be sufficient to accommodate projected growth under the Land Use Element/Zoning Code Amendments. As such, the Project is considered to have a less than significant impact with respect to population. The Reduced Intensity Alternative would generate a population increase that is less than under the Project and, as such, this Alternative would have less impact relative to the General Plan's population objectives than under the Project.

b. Housing

The Reduced Intensity Alternative would provide 222 housing units (including 56 transient units) compared with an estimated 336 residential units under the Project. As such, Alternative 2 would also be consistent with the objectives of the Housing Element. Impacts relative to the Town's housing goals would be less than significant under both the Project and the Reduced Intensity Alternative. However, because of the reduction in net increase, the Reduced Intensity Alternative would have relatively less impact than under the Project.

10. Public Services

a. Fire Protection

The Reduced Intensity Alternative would incrementally increase population over current projections and would potentially impact service ratios related to fire services. The Reduced Intensity Alternative anticipates approximately 33.9 percent less growth in residential units and 54.4 percent less growth in hotel rooms and visitors than under the Project. Projected population under the Reduced Intensity Alternative (1,145) would be approximately 42 percent less than under the Project (1,978). As with the proposed Land Use Element/Zoning Code Amendments and Mobility Element Update, the Reduced Intensity Alternative would improve multimodal access and emergency access. It would also include the vacation of frontage roads and the reconfiguration of Main Street to a four-lane cross-section with a center median and turn pockets. As under the Project, the Reduced Intensity Alternative would include construction associated with street improvements; thus causing potential lane closures or other access issues during construction that could affect emergency response times. As with the Project, long-term emergency response effects would be improved under the Mobility Element Update. The Reduced Intensity Alternative would have less impact than the Project with respect to fire protection services.

b. Police Protection

The Reduced Intensity Alternative would result in increased hotel and residential densities compared to current projections, thereby resulting in greater demands for police services. As discussed in Section 4.10.2, Police Services, of this EIR, the Town recently approved funding and the construction of a new police facility with a planned completion date of December 2017 and Development Impact Fees (DIFs) would ensure that potential impacts to police protection services would be reduced. These would also apply to the Reduced Intensity Alternative which, as with the Project, would result in less than significant impacts to police services. Given the reduction in development that would occur under the Reduced Intensity Alternative relative to the Project and the resulting population increase, the Reduced Intensity Alternative would have less impact than the Project with respect to police services.

c. Schools

As with the Project, the Reduced Intensity Alternative would accommodate greater residential densities within the Main Street and Old Mammoth Road neighborhoods than under existing projections. While the Land Use Element/Zoning Code Amendments could result in an additional 136 new students, the Reduced Intensity Alternative would have approximately 33.9 fewer residential units than under the Project and the projected student growth compared to the Project would be approximately 90 students more than the existing projections. However, as with the Project, the payment of development impact fees applicable at a building permit application would reduce the impacts on schools to a less than significant level. Therefore, as with the Project, impacts to schools would be less than significant. However, because the Reduced Intensity Alternative would reduce residential units compared to the Project, it would have less impact than the Project with respect to schools.

d. Parks and Recreation

As with the proposed Land Use Element/General Plan Amendments, the Reduced Intensity Alternative would not provide for new parkland in the Town's commercial districts. The current PRMP reflects the General Plan's objectives to develop more park and recreational facilities to serve the Town, which does not

meet its standard of 5 acres of local parks or 2.5 acres of regional parks per 1,000 people. The Reduced Intensity Alternative has the potential to incrementally increase the General Plan buildout population by 1,477 and, as with the Project, the Reduced Intensity Alternative would increase demand for existing neighborhood/regional parks and other recreational facilities, or result in the expansion of new recreational facilities. Although DIF, taxes and other funding mechanisms applicable to new development would reduce the impact of the Reduced Intensity Alternative on parks and recreational facilities, because the Town is currently below the LOS goal of 5 acres of parks per 1,000 residents for developed parkland, and the Reduced Intensity Alternative would further increase demand for parks and recreational facilities and exacerbate impacts to parks and recreational facilities, impacts to parks and recreation facilities are considered significant and unavoidable. However, because anticipated population gain under the Reduced Intensity Alternative (1,145) is incrementally less than under the Project (1,978), the significant and unavoidable impact would be less than under the Project.

11. Transportation and Traffic

The Reduced Intensity Alternative would generate incrementally fewer trips than the Project. As shown in **Table 5-5, Significant LOS Impacts - Comparison of the Reduced Intensity Alternative to the Project**, the Reduced Intensity Alternative would have the effect of reducing LOS impacts at the intersections of Old Mammoth Road/Sierra Nevada Road to a likely significant impact and at Old Mammoth Road/Minaret Road/Fairway Drive to a possible significant impact. The comparison in Table 5-5 indicates a greater relative reduction in LOS impacts at the Old Mammoth Road/Sierra Nevada Road intersection and the Main Street/Laurel Mountain Road compared to the Project. However, the incremental reduction is not substantial enough to reduce impacts at any of the intersections to a less than significant level. Although mitigation measures (signals) would reduce impacts to less than significant levels, signals on Main Street must be approved by Caltrans. As such, impacts on Main Street intersections would be significant and unavoidable. Although impacts would remain significant and unavoidable for Main Street intersections under the Reduced Intensity Alternative, because the Reduced Intensity Alternative would incrementally reduce traffic and LOS at two of the impacted intersections, it would have less traffic impact than under the Project.

Table 5-5

**Comparison of the Project (Scenario 6) to the Reduced Intensity Alternative
Significant LOS Impacts**

No.	Impacted Intersection	Project (Scenario 6)	Reduced Intensity Alternative
3	Main Street/Mountain Boulevard	X	X
4	Main Street/Post Office	X	X
6	Main Street/Forest Trail	X	X
7	Main Street/Laurel Mountain Road	X	Likely significant impact
12	Old Mammoth Road/Sierra Nevada Road	X	Possible significant impact
19	Old Mammoth Road/Minaret Road/Fairway Drive	X	X

Source: LSC Transportation Consultants, 2016.

As with the Project, the Reduced Intensity Alternative would be consistent with AB 1358, which requires municipalities to craft a specific network of travel options through an adopted General Plan circulation element. Under AB 1358, the circulation element must reflect land use patterns that further support the effectiveness of a multimodal transportation network. The Reduced Intensity Alternative would be consistent with AB 743, which is intended to support residential/mixed-use densification for the purpose of inducing greater pedestrian and other multi-modal activity and, thus, reduce vehicle miles travelled. However, because the Reduced Intensity Alternative would not generate densification within the Town's commercial areas to the same extent as the Project, it would be considered to have a greater impact with regard to the adopted State guidelines than the Project. As with the Project, impacts with respect to State transportation guidelines would be less than significant.

12. Utilities

a. Water

(1) Infrastructure

As with the Project, the Reduced Intensity Alternative could result in incremental growth in the Town's commercial districts over that considered under the General Plan buildout. As with the Project, the Alternative would impact the capacity of water mains within and beyond the Town's commercial districts. The Water Code requires adequate delivery systems and the payment of development fees, which would support necessary new or upgraded water mains and other water infrastructure. It is expected that any necessary upgraded water mains would be site-specific or related to specific development projects. The site-specific scope of construction and the required review and approval of all water main construction projects by the MCWD would ensure that appropriate construction practices would be followed and that the construction of site-specific water mains and connections would not result in significant environmental impacts. As with the Project, it is not expected that any currently unplanned water treatment systems would be required as a result of the Reduced Intensity Alternative. The MCWD's projected water treatment capacity is consistent with buildout demand and, although existing treatment facilities and water mains may need to be upgraded through time, as with the Project, the Reduced Intensity Alternative would not require extensive construction of new lines or treatment plant in areas that are not currently served. As such, large scale or disruptive construction projects beyond regular maintenance are not anticipated. As with the Project, environmental impacts associated with construction of new delivery and treatment systems would be less than significant. However, because the Reduced Intensity Alternative would result in less concentrated growth than under the Project, impacts to water delivery lines and treatment systems are anticipated to be less.

(2) Water Supply

Table 5-6, *Water Demand - Comparison of the Reduced Intensity Alternative to the Project*, compares the total water demand of the Project to the Reduced Intensity Alternative. Table 5-6 represents the Project and the Reduced Intensity Alternative as incremental increases of the General Plan buildout. Based on extrapolated unit factors used by the MCWD to derive the UWMP's 2030 projections, Table 5-6 indicates that the Reduced Intensity Alternative would reduce total projected demand from 4,302 AFY under the Project to 4,259 under the Reduced Intensity Alternative. The Reduced Intensity Alternative, as with the Project, would not exceed the cap of 4,387 AFY, which is the MCWD's existing maximum entitlement.

Table 5-6

Water Demand – Comparison of the Reduced Intensity Alternative to the Project

Use	Project		Reduced Intensity Alternative	
	Units/Floor Area	AFY	Units/Floor Area	AFY
Single Family	2,771	640	2,771	640
Multifamily	8,959 + 252 ^a = 9,211	1,520	8,959 + 167 = 9,126	1,506
Motel/Hotel	5,982 + 467 ^b + 84 ^c = 6,533	497	5,982 + 213 + 56 = 6,251	475
Commercial	1,365,002 sq. ft. + 152,533 ^d = 1,517,535 sq. ft.	395	1,365,002 sq. ft. + 127,364 = 1,492,336 sq. ft.	388
Institutional	48	103	48	103
Irrigation (including golf courses)	41	718	41	718
Additional Water Uses and Losses		429		429
AFY Totals:		4,302		4,259

^a Additional Multi-family units as a potential result of Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR. While the Town proposes a change from People At One Time (PAOT) and permanent/transient units, given the methodology used for water in the UWMP projected units resulting from the proposed Land Use Element/Zoning Code Amendments are broken out as permanent and transient in this table. As shown in Table 4.9-5, using the PAOT approach, 336 multifamily units could result with 252 permanent units and 84 transient units.

^b Additional hotel rooms as a potential result of the Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR.

^c Additional transient units as a potential result of the Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR. Please see note b above for a more detailed explanation regarding the methodology. Transient units are categorized as a hotel/motel use under the UWMP.

^d Additional commercial floor area that could result from the proposed Land Use Element/Zoning Code Amendments as discussed in Chapter 2, Project Description and shown in Table 2-3 of this EIR.

Source: ESA PCR, 2016

In 2015, the MCWD experienced the most severe drought year in its history. Currently there is uncertainty about the amount and timing of aquifer recharge, including sustaining or reaching the maximum cap of 4,387 AFY. The incremental increase in the General Plan buildout under the Reduced Intensity Alternative, as with the Project, has the potential to exceed supply in times of extended drought. However, with the implementation of the General Plan Policy R.4.A and GPMM 4.11-1, which require the Town to work with MCWD to ensure that land use approvals are phased and that water supply sources are determined prior to development approvals, the Reduced Intensity Alternative, as with the Project, would not exceed water supplies. Impacts with respect to water supplies would, therefore, be less than significant under both the Project and the Reduced Intensity Alternative. However, because the Reduced Intensity Alternative would incrementally reduce demand compared to the Project, impacts with respect to water demand would be less.

b. Wastewater

(1) Infrastructure

The Reduced Intensity Alternative would incrementally reduce the Project's hotel and residential densities in the Town's commercial districts. Compared to the Project's population growth of approximately 1,978 over current General Plan buildout projections, the Reduced Intensity Alternative would generate an incremental population increase of approximately of 1,145 over General Plan estimates. Under both the Reduced

Intensity Alternative and the Project, increases would occur in the Town's commercial districts. Although any increase has the potential to exceed the capacity of the existing lines serving the Town's commercial districts or to adversely impact any downstream sewer line capacities or deficiencies, the Reduced Intensity Alternative would have incrementally less impact than under the Project. As with the Project, impacts to sewer lines would be addressed by the Sanitary Sewer Code, under which no building permits would be issued for uses that would exceed the capacity of specific sewer lines, and through Mitigation Measure WW-1, which requires the applicant for any building permit to install improvements that would comply with Division VII of the Sewer Code. Under both the Project and Reduced Alternative, impacts to wastewater infrastructure would be less than significant. However, because the Reduced Intensity Alternative would incrementally reduce the Project's population gain and demand on sewer lines serving the commercial areas, impacts to sewer lines would be less than under the Project.

(2) Wastewater Treatment

The Reduced Intensity Alternative would result in less development and population increase than under the proposed Land Use Element/Zoning Code Amendments. The incremental population increase of 1,145 under the Reduced Intensity Alternative would generate approximately 95,035 gpd or approximately 105 AFY. Total demand for treatment would increase from the MCWD's projected 2,330 AFY (under the General Plan buildout) to 2,435 AFY. As with the Project, the Reduced Intensity Alternative, in combination with the General Plan buildout, would generate less wastewater than the MCWD's estimated treatment capacity of 4.9 mgd or approximately 5,488 AFY. Both the Reduced Intensity Alternative and the Project (which would increase total buildout demand to approximately 2,517 AFY) would have less than significant impacts with respect to wastewater treatment. However, because the Reduced Intensity Alternative would reduce total demand compared to the Project, it would have less impact with respect to wastewater treatment than the Project.

c. Stormwater

Under the Reduced Intensity Alternative development of the Town's vacant parcels in the commercial districts would occur as with the Project. Any decrease in permeability associated with development of the Town's vacant lands resulting from development, such as building foundations, driveways, and other paved surfaces in the Main Street and Old Mammoth Road commercial districts would increase surface runoff that could affect the Town's existing drainage systems, which were identified in the 2015 Stormwater Management Plan (SMP) as potentially deficient. As with the Project, stormwater impacts under the Reduced Intensity Alternative would be reduced to a less than significant level through drainage impact fees, design measures such as landscaped buffers and infiltration devices, and MM STRM-1, which would require the determination of peak surface runoff for all private projects and implementation of suitable infiltration devices. However, the Reduced Intensity Alternative would generate incrementally less growth in the Town's commercially-zoned districts than anticipated under the Land Use Element/Zoning Code Amendments and, as such, would have less impact with respect to stormwater facilities. The Mobility Element Update under the Reduced Intensity Alternative also has the potential to increase surface runoff and increase flow into the Town's storm drain system. New road construction would require consistency with the Department of Public Works' Standards and all new public streets, sidewalks, and trails projects must provide drainage facilities. Mitigation measures for the Trails System Master Plan and the Town's Standards for public works projects would reduce potential adverse impacts of the Mobility Element Update on the Town's existing drainage system to a less than significant level. Impacts with respect to stormwater systems would be similar under both the Reduced Intensity Alternative and the Project.

d. Solid Waste

The Reduced Intensity Alternative would increase the estimated population growth under the General Plan buildout and reduce the estimated increase in population envisioned under the Land Use Element/Zoning Code Amendments and total solid waste demand. The incremental increase of 222 residential units, 213 lodging units, and approximately 345 employees (associated with 127,346 square feet of retail space) over the General Plan buildout under the Reduced Intensity Alternative would result in a net increase of approximately 1,480 tons of solid waste a year. The Project would result in a net increase of approximately 2,387 tons of solid waste per year over General Plan buildout. Any increase in solid waste demand has the potential to impact existing landfill facilities. The current landfill, Benton Crossing Landfill, is scheduled for closure. However, the County is planning for three future alternative sites or potential trucking to other exiting sites. In addition, with increasing diversion techniques to reduce the waste stream and the conclusion of the County General Plan Update that impacts on solid waste facilities would be less than significant, it is expected that the Project would have a less than significant impact relative to solid waste facilities. In addition, the Town will continue to operate waste collection and recycling to increase the statewide recycling rates to 75 percent by 2020. While both the Reduced Intensity Alternative and the Project would result in an increase in population in the Town's commercial districts, neither would conflict with applicable federal, state and local policies and regulations regarding solid waste and the geographic concentration of population, which could potentially increase recycling rates. Impacts with respect to solid waste facilities under both the Reduced Intensity Alternative and the Project would be less than significant. However, because the Reduced Intensity Alternative would generate an incrementally smaller increase in solid waste than the Project, impacts to solid waste facilities under this Alternative would be less than under the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Intensity Alternative would reduce but not avoid the Project's significant and unavoidable LOS traffic impact on Main Street. As with the Project, a significant and unavoidable impact would occur if Caltrans does not agree to signals and other improvements that, otherwise, serve as mitigation for LOS traffic impacts on that street. The Reduced Intensity Alternative would incrementally reduce but not avoid the Project's significant and unavoidable air quality impacts and significant and unavoidable impacts with respect to parks and recreational facilities. Because the Reduced Intensity Alternative would result in incrementally less new development, impacts associated with noise, fire services, police services, schools, water supply, wastewater, and solid waste would be less than under the Project. Impacts related to stormwater facilities associated with new land coverage, as well as forestry, biological, and cultural resources would be similar to the Project. As with the Project, impacts associated with services and these resources would be less than significant, or mitigated to less than significant levels. Because the Reduced Intensity Alternative would incrementally reduce mixed-use development in the Town's pedestrian-oriented areas compared to the Project, it would contribute less mixed-use activity and create less vibrancy of the street fronts and, as such, it is considered to have greater visual character and land use impacts than under the Project. While the Reduced Intensity Alternative would incrementally reduce most of the Project's less than significant impacts, it would not meet the Project's primary objectives to the same degree. The Reduced Intensity Alternative would remove the unit cap, but result in less overall density. Therefore, the Reduced Density Alternative would not contribute to meeting the Town's objective to create a vibrant and walkable downtown area to the same extent as the Project. The Reduced Intensity Alternative has to potential to generate less development activity than the Land Use Element/Zoning Code Amendments and, as such, somewhat less potential for implementation of the Town's objectives. The Reduced Intensity Alternative

would meet the objectives of the Project to amend the Land Use Element policy and text associated with regulating population growth from a PAOT approach to an impacts assessment based approach. It would meet the Town's objectives to delete the CBIZ and modify TDR policies and, as such, would meet the Town's objective to streamline the planning process to encourage economic development. Because the Reduced Intensity Alternative would adopt the Mobility Element Update, as with the Project, it would meet the objective to create a downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles traveled. In addition, because the Reduced Intensity Alternative would adopt the Mobility Element Update, it would meet the Town's objective to achieve a progressive and comprehensive multimodal transportation system that is connected, accessible, and safe.

F. ALTERNATIVES ANALYSIS

3. ALTERNATIVE 3: MOBILITY ELEMENT UPDATE WITHOUT THE MAIN STREET RECONFIGURATION

A. DESCRIPTION OF THE ALTERNATIVE

Alternative 3, Mobility Update without the Main Street Reconfiguration, would include the Land Use Element/Zoning Code Amendments, in particular the removal of the unit and room cap and provision for a 2.0 FAR, as well as the components of the Mobility Element Update, with the exception of the Main Street Plan. The Main Street Plan would not be implemented, the existing frontage road along Main Street would not be vacated, and approximately 2.6 acres of land created by the vacation would not be available for future development. Without the street vacation, Alternative 3 would result in a reduction of potential future development of 23 residential units, 40 lodging units, and 28,957 square feet of commercial floor area within the vacated area, as estimated under the Project. Changes to the street front and streetscape anticipated under the Main Street Plan would also not occur. Without the vacation of the approximately 24-foot-wide frontage road and street-oriented parking, buildings along Main Street’s commercial stretch would remain in existing locations and would not be redeveloped along SR 203 and parking would not be moved to the back and sides of commercial or mixed-use buildings. Some portions of the Main Street Plan would be implemented, but it would be limited to certain improvements, including parallel parking, detached bicycle lanes, landscaped median, turning lanes, and sidewalks adjacent to building fronts. Other pedestrian enhancements, such as the Main Street Plan’s recommended additional streets and street-like private drives between Sierra Park Road and Manzanita Road, parallel to and in some cases interconnecting with Main Street, could be constructed. The vacation of the frontage road would not occur under Alternative 3. As such, **Table 5-7, Mobility Element Update Without the Main Street Reconfiguration Alternative (Alternative 3) - Reduction in Uses Compared to the Project**, shows the potential scope of development compared to the Project. Although overall development would be incrementally less than under the Project, overall intensity would be greater than under Alternative 2, the Reduced Intensity Alternative. As shown in Table 5-7, incremental reductions in commercial floor areas would be greater compared to the Project than residential and hotel room reductions.

Table 5-7

**Mobility Element Update Without the Main Street Plan Reconfiguration Alternative (Alternative 3)
Reduction in Uses Compared to the Project**

Use	Land Use Element/Zoning Code Amendments (2.0 FAR)	Alternative 3	Unit Difference	Percentage Difference
Residential Units	336 units	313 units	-23 units	6.8% reduction
Lodging (Rooms)	467 units	427 units	-40 rooms	8.5% reduction
Commercial Square Footage	152,533 square feet	127,567 square feet	-28,957 square feet	18.9% reduction

Source: ESA PCR, 2016

B. ENVIRONMENTAL IMPACTS

1. Aesthetics/Visual Resources

a. Scenic Vistas and Resources

Under Alternative 3, as with the Project, maximum building heights set forth under the Zoning Code Update would be maintained. Under the Land Use Element/Zoning Code Amendments, view impacts were identified as less than significant because building heights and envelopes would be the same as under existing Code requirements. However, the Mobility Element Update, which has the potential to narrow Main Street from approximately 200 feet to 130 feet, while moving buildings closer to the street front under the existing Zoning Code Update, could have an impact on views through the narrowing of the Main Street view corridor. Panoramic views of Mammoth Mountain from the Main Street corridor would be incrementally narrower, although less than significant since public views would remain. Although the Project's impact on the view corridor would be less than significant, because Alternative 3 would not implement the Main Street Plan, the street corridor would not be narrowed and impacts relative to public views through the Main Street corridor would be avoided. Therefore, Alternative 3 would have less impact on scenic vistas than the Project.

b. Visual Character and Quality

Alternative 3, as with the Project, would entail more construction activity than under the projected General Plan buildout. Construction activities include the removal of the frontage road along Main Street, installation of new landscaping, street crossing improvements, and other improvements. Future construction activities could require excavation and the use of heavy machinery, hauling, temporary stockpiling, and possible scrubbing and clearing of vegetation. These activities could cause temporary degradation of visual quality. Under the Project, these short-term impacts would be mitigated to a less than significant level. However, because Alternative 3 would avoid short-term construction impacts associated with the realignment and landscaping of Main Street, it would have incrementally less visual quality impact with respect to short-term construction.

As with the Project, Alternative 3 would not change existing development standards, policies or design standards of the Zoning Code Update, such as provision for the placement of buildings as close to the street as possible, with parking underground, behind a building, or on the interior side or rear of the site (Sec. 17.24.030.E); improvements to property frontage to provide a wider public sidewalk and space for landscaping, public art, and/or pedestrian amenities such as outdoor seating (Sec. 17.24.030); design of building entrances to emphasize special architectural, roof lines or landscape treatments (Sec. 17.24.040.B); and required transparency and openings along the sidewalk for commercial buildings (Section 17.24.040.C) and, as such, would not lose these aesthetic benefits. Alternative 3, however, would not upgrade the appearance of Main Street through the realignment and implementation of design standards under the Main Street Plan. As such, because Alternative 3 would not contribute to the improved appearance of Main Street, it is considered to have greater long-term visual quality impact than the Project.

c. Light and Glare

Under Alternative 3, the Town of Mammoth Lakes Outdoor Lighting Ordinance, which regulates nighttime lighting, would be enforced as under existing conditions. New street lighting associated with implementation of the Mobility Element Update would be the same as under the Project; however, commercial development would be approximately 18.9 percent less along Main Street. This could result in a

decrease in commercial signage along Main Street compared to the Project. Any new development under the Land Use Element/Zoning Code Amendments and Mobility Element Update would also be subject to the Outdoor Lighting Ordinance and would have a less than significant impact with respect to light and glare. However, because the Reduced Intensity Alternative would not entail the same extent of development along Main Street, it would have incrementally less light and glare impact than under the Project.

d. Shade/Shadow

Under Alternative 3, as with the implementation of the Land Use Element/Zoning Code Amendments, Code development standards such as height, setbacks, parking requirements, and lot coverage would not change. Therefore, impacts related to shade are not anticipated under either Alternative 3 or the Project. However, implementation of the Main Street Plan under the Mobility Element Update would result in a reduction in the right-of-way width along Main Street, allowing for future buildings to be located approximately 35 feet closer to Main Street than under existing conditions. Therefore, under the Mobility Element Update, buildings at the new property line along Main Street would increase the amount and duration of shadows along the roadway. Because Alternative 3 would not create a narrower building corridor along Main Street it would potentially reduce the Project's shade/shadow impacts along Main Street. Although shading impacts would be less than significant under both the Project and Alternative 3, shading impacts would be less under Alternative 3.

2. Air Quality

Alternative 3 would result in more intensive buildout than the Mobility Element Update alone, slightly less development compared with the Land Use Element/Zoning Code Amendments alone, and less development than the Land Use Element/Zoning Code Amendments with Mobility Element Update. Construction and operation under Alternative 3 would result in potentially significant air quality impacts with regard to air quality, especially PM₁₀ and PM_{2.5}. The air quality impacts would be slightly greater than the Mobility Element Update and slightly less than the Land Use Element/Zoning Code Amendments with Mobility Element Update. Although implementation of the recommended mitigation measures would reduce air quality impacts, construction and operation impacts under Alternative 3 would still be significant and unavoidable similar to the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update. Alternative 3 would have significant and unavoidable impacts which would be greater than impacts associated with the Mobility Element Update alone, which would be less than significant. Impacts related to localized CO concentrations and toxic air contaminants would be similar to the Project and would remain less than significant. Implementation of Alternative 3 would not conflict with any applicable air quality management plans similar to the Project, and impacts would remain less than significant. Alternative 3 could potentially contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment (i.e., PM₁₀) under the State standards similar to the Project (Land Use Element/Zoning Code Amendments and Mobility Element Update) or the Land Use Element/Zoning Code Amendments alone. These scenarios would result in significant and unavoidable air quality impacts. However, Alternative 3 would result in greater air quality impacts than under the Mobility Element Update alone scenario, which would be less than significant.

3. Forestry Resources

Buildout of the Land Use Element/Zoning Code Amendments under Alternative 3 would occur within the Town's commercial districts and would not affect forestry resources. Alternative 3, however, would implement the Mobility Element Update and, as with the Project, MUPs under the Mobility Element's TSMP would extend into forested areas along the Mammoth Scenic Loop, multiple paths in the Shady Rest Park area, and around Lake Mary. Because these areas are heavily forested, the development of trails and the roads would result in the removal of forest trees. The final design for the proposed MUPs would comply with TS 4.A-3.B, which requires that healthy, native trees would be circumvented or avoided through the design of trail alignments to the extent feasible. As with the Project, implementation of the Mobility Element Update under Alternative 3 would affect forestry resources to the north of Main Street. Similar mitigation measures that require circumventing or avoiding healthy, native trees through the design of roadway alignments in this area would be implemented under both Alternative 3 and the Project. With mitigation, the impact of Alternative 3 on forestry resources would be less than significant and similar to that of the Project.

4. Biological Resources

Under Alternative 3, the Mobility Element Update would be adopted with the exclusion of the Main Street Plan. The existing frontage road along Main Street would not be vacated, and 2.6 acres of land created by the vacation would not be available for future development. The Land Use Element/Zone Change Amendments would be implemented. However, because, the Main Street Plan would not be implemented, 2.6-acres of vacated street front along Main Street would not be available for development. The right-of-way that would be vacated along Main Street is generally disturbed. However, some of the land supports trees associated with the Eastern Sierra conifer forest community. As discussed in Section 4.4, Biological Resources, of this EIR, the Project's buildout of vacant parcels and construction of road improvements and MUPs may affect wetlands and/or other jurisdictional features through potential dredging and filling activities. Construction and maintenance activities elements are proposed within habitats that could support several special-status plant and wildlife species. Under the Project, compliance with mitigation measures and applicable policies in the General Plan would reduce impacts to wetlands, habitat, special-status plant and wildlife species and migratory birds would reduce impacts to a less than significant level. Avoiding the development of vacated land along Main Street area under Alternative 3 would incrementally reduce potential biological resources impacts with respect to conifer trees along Main Street and any potential wetland features in that area. Alternative 3 could, therefore, represent a minor reduction in impacts with respect to biological resources compared to the Project. Under both Alternative 3 and the Project, impacts on biological resources would be reduced to less than significant levels.

5. Cultural Resources

Buildings considered to be potential historical resources are located within the Land Use Element/ Zoning Code Amendments project area and several known historic resources have been recorded within or in the immediate vicinity of the Mobility Element Update area. It is possible that additional historic resources are present within the Project Areas that have yet to be evaluated for eligibility for listing in the local, State, and/or federal registers. In addition, 86 archaeological or historical resources are located within or in the immediate vicinity of the Mobility Element Update project area while six resources are located within or in the immediate vicinity of the Land Use Element/Zoning Code Amendments project area. Components of the Project that include excavations into native soils or sediments would have the potential to impact these resources or additional archaeological resources within the Project Area that have yet to be discovered.

Under the Project, the implementation of the TSMP and General Plan mitigation measures applicable to cultural resources would reduce potential impacts to less than significant levels. Alternative 3 would apply to the same development areas as under the Project, with the exception of the Main Street realignment areas. These areas are currently undeveloped and construction in these areas would not involve built historical resources. However, the potential exists for buried historical or archaeological resources to be impacted during construction. Because Alternative 3 would not involve construction impacts within the vacated frontage road areas, it would have incrementally less impact than under the Project with respect to buried and historical resources. As with the Project, impacts under Alternative 3 would be reduced to less than significant levels through the implementation of TSMP and General Plan mitigation measures. However, impacts under Alternative 3 would be incrementally less.

6. Greenhouse Gas Emissions GHG

Alternative 3 would result in more intensive buildout than the Mobility Element Update, slightly less intensity of development than the Land Use Element/Zoning Code Amendments and less intensity buildout than the Land Use Element/Zoning Code Amendments with Mobility Element Update. Construction and operation under Alternative 3 would result in less than significant GHG emissions similar to those of the Project. The Mobility Element Update Without the Implementation of the Main Street Plan Alternative would not generate GHG emissions, either directly or indirectly, that would result in a significant impact on the environment similar to the Project. The Mobility Element Update Without the Implementation of the Main Street Plan Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions similar to the Project. As with the Project, GHG impacts would remain less than significant with the Mobility Element Update Without the Implementation of the Main Street Plan Alternative.

7. Land Use

Alternative 3 would not conflict with applicable objectives the Land Use Element of the General Plan, and Title 17 of the Zoning Code, or other Town plans and policies. As with the Project, Alternative 3 would adopt the Mobility Element Update and require the Land Use Element/Zoning Code Amendments to allow for the 2.0 FAR, with no unit cap. As with the Project, Alternative 3 would implement objectives of the General Plan's Land Use Element to enhance livability of districts for walking through the arrangement of land uses and development intensities (Goal L.3), to develop vital retail centers and streets (Policy L.3.B), and to provide an overall balance of uses, facilities, and services to further the town's role as a destination resort community (Goal L.5). However, because it would not provide for the implementation of the Main Street Plan, which specifically meets these goals in the Main Street commercial zones, it would not meet these goals to the same extent as the Project.

Alternative 3 would implement the goals of the current General Plan Circulation Element to develop and implement a townwide way-finding; to improve regional transportation system; to emphasize feet first, public transportation second, and car last in planning the community transportation system; to encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive; to provide a year-round local public transit system that is convenient and efficient; to encourage alternative transportation and improve pedestrian mobility by developing a comprehensive parking management strategy; to maintain and improve safe and efficient movement of people, traffic, and goods in a manner consistent with the feet first initiative; or to enhance small town community character through the design of the transportation system to the same extent as the proposed Mobility Element

Update. However, because it would not provide for the implementation of the Main Street Plan, it would not meet goals to enhance pedestrian activity along Main Street or to support alternative transportation to the same extent as the Project. In addition, Alternative 3 would reduce the land available for mixed-use along Main Street and, as such, not meet the goals of AB 743 in providing mixed-use development (the physical proximity of residential and commercial uses to reduce vehicle miles travelled) to the same extent as the Project.

As with the Project, impacts related to adopted plans and policies would be less than significant. However, because Alternative 3 would not support the development of the Main Street area to the same extent as the Project, it would have greater land use impact than under the Project regarding consistency with adopted plans and policies.

8. Noise

Under Alternative 3, construction-related noise impacts would be slightly less than those of the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update given that less land area would be available for development along Main Street resulting in less intensive buildout. Nonetheless, as with the Project, construction under the Reduced Intensity Alternative would result in less than significant noise impacts with implementation of mitigation measures. Operational noise impacts under the Reduced Intensity Alternative would also be slightly less than those of the Land Use Element/Zoning Code Amendments and the Land Use Element/Zoning Code Amendments with Mobility Element Update given the less intensive buildout and reduced traffic levels. Similar to the Project, operation of Alternative 3 would result in less than significant impacts with the implementation of mitigation measures. Alternative 3 would result in slightly less groundborne vibration and groundborne noise impacts than the Project given the less intensive buildout, and like the Project, impacts would be less than significant and no mitigation would be required.

9. Population/Housing

a. Population

Because Alternative 3 would not incorporate the Main Street realignment, the availability of 2.6 acres of land that would result from the vacation of the frontage roads would not occur. Alternative 3 would reduce the Project by approximately 23 residential units and 40 lodging units that could have otherwise developed within the area. As shown in **Table 5-8, *Increment of Potential Population Increase for Alternative 3***, Alternative 3 would result in a potential incremental population increase of 1,732 over the projected General Plan Buildout using the PAOT methodology and 1,829 using the proposed buildout methodology. The Land Use Element/Zoning Code Amendments are estimated to generate a net population increase of 1,877 (calculated according to PAOT methodology of persons per unit) or 1,978 (calculated under the new methodology of persons per unit) over the General Plan Buildout. Compared to the Project, Alternative 3 represents a reduction in incremental population growth of approximately 7.7 percent under the PAOT methodology and 7.5 percent under the proposed buildout methodology. As concluded in Section 4.9, Population and Housing, of this EIR, the estimated maximum buildout over the time period addressed within the General Plan would be sufficient to accommodate projected growth under the Land Use Element/Zoning Code Amendments. As such, the Project is considered to have a less than significant impact with respect to population. Alternative 3 would generate incrementally less increase than under the Project and, as such, Alternative 3 would have less impact on the General Plan's population objectives than under the Project.

Table 5-8

**Increment of Potential Population Increase for Alternative 3
Calculated According to PAOT and Proposed Methodology**

	<u>Amount</u>	<u>Units</u>	<u>Factor</u>	<u>Potential Increase in Population Capacity</u>
PAOT Methodology:				
Residential Units ^a				
Permanent	235	Units	2.4 ^b	564
Transient	78 ^c	Units	4	312
Hotel	214 ^d	Rooms	4	<u>856</u>
Total	527			1,732 PAOT
Proposed Methodology:				
Combined Residential, Transient, and Hotel Units	527	Total Units	3.47	1,829 People

^a For purposes of this analysis an assumption of 75 percent permanent and 25 percent transient was used for the multi-family residential units based on the proportions by Traffic Analysis Zone (TAZ) in the Traffic Model.

^b A factor of 2.4 was used based on the rate used in the 2007 General Plan.

^c Transient units are estimated to be approximately 25% of the net increase of 313 permanent residential units.

^d The 214 hotel units represents 427 hotel rooms. Consistent with Zoning Code Section. 17.32.110.C.7, hotel rooms, studios and 1-bedroom units are considered one-half of a unit for calculating density.

^e The household population estimate of 3.47 is consistent with population assumptions used in the 2007 General Plan.

Source: ESA PCR Services Corporation, 2016

b. Housing

The Project would support an increase in the potential supply of housing in commercial districts by an estimated 336 residential units and would not adversely affect the expected supply of housing for the Town or objectives of the General Plan Housing Element. Alternative 3 would provide 235 housing units (including 78 transient units) and, as such, would also be consistent with the objectives of the Housing Element. Impacts relative to the Town's housing goals would be less than significant under both the Project and Alternative 3. However, because of the reduction in net increase, Alternative 3 would have relatively less impact than under the Project.

10. Public Services

a. Fire Protection

As with the proposed Land Use Element/Zoning Code Amendments and Mobility Element Update, Alternative 3 would improve multimodal access and emergency access. However, Alternative 3 would not include the vacation of Main Street frontage roads but some improvements to Main Street would occur, such as conversion to a four-lane cross-section with a center median and turn pockets in some locations. Alternative 3 would not require as much in the way of construction, landscaping, and other improvements

during the reconfiguration that would occur under the Project, potentially resulting in lane closures. As such, Alternative 3 would have fewer short-term construction impacts on Main Street relative to emergency access than the Project. As with the Project, long-term emergency response effects would be less than significant. Alternative 3 would result in an incremental increase in population over current projections and would potentially impact service ratios related to fire services. Alternative 3 anticipates approximately 6.8 percent less growth in residential units and 8.5 percent less growth in hotel room and visitors than under the Project. Projected population under Alternative 3 would be approximately 8 percent less than under the Project. As with the Project, impacts on fire service ratios would be considered less than significant. However, because Alternative 3 would generate incrementally less growth than the Project, it would have less impact than the Project relative to fire service personnel/population ratios.

b. Police Protection

Alternative 3 would result in increased hotel and residential densities compared to current projections, which would result in greater demands for police services. As discussed in Section 4.10.2, Police Services, of this EIR, the Town recently approved funding and the construction of a new police facility with a planned completion date of December 2017 and Development Impact Fees (DIFs) would ensure that potential impacts to police protection services would be reduced to less than significant levels. These would also apply to the Alternative 3, which as with the Project, would result in less than significant impacts to police services. However, because Alternative 3 anticipates approximately 6.8 percent less growth in residential units and 8.5 percent less growth in hotel rooms and visitors than under the Project, with approximately 8 percent less population increase than under the Project, it would have incrementally less impact than the Project relative to police services.

c. Schools

As with the Project, Alternative 3 would accommodate greater residential densities within the Main Street and Old Mammoth Road neighborhoods than under existing projections. It is estimated that the Land Use Element/Zoning Code Amendments could result in an additional 136 new students, which is not considered a substantial fluctuation in enrollment. In addition, developer fees applicable at a building permit application would reduce the Project's impacts on schools to a less than significant level. As with the Project, the incremental increase in residential units under Alternative 3 would generate additional students. However, because the Alternative 3 would have approximately 6.8 fewer residential units than under the Project, projected student growth compared to the Project would be approximately 6.8 percent less (approximately 127 students over existing projections). As with the Project, impacts to schools would be less than significant. However, because Alternative 3 would reduce residential units compared to the Project, it would have less impact than the Project with respect to schools.

d. Parks and Recreation

As with the proposed Land Use Element/General Plan Amendments, Alternative 3 would not provide for new parkland in the Town's commercial districts. The current PRMP reflects the General Plan's objectives to develop more park and recreational facilities to serve the Town, which does not meet its standard of 5 acres of local parks or 2.5 acres of regional parks per 1,000 people. Alternative 3 has the potential to incrementally increase the General Plan buildout population by 2,584 and, as with the Project, Alternative 3 would increase demand for existing neighborhood/regional parks and other recreational facilities, or result in the expansion of new recreational facilities. Although DIF, taxes and other funding mechanisms applicable

to new development would reduce the impact of the Reduced Intensity Alternative on parks and recreational facilities, because the Town is currently below the LOS goal of 5 acres of parks per 1,000 residents for developed parkland, and Alternative 3 would further increase demand for parks and recreational facilities and exacerbate impacts to parks and recreational facilities, impacts to parks and recreation facilities are considered significant and unavoidable. However, because anticipated population gain under the Reduced Intensity Alternative (1,145) is incrementally less than under the Project (1,978), the significant and unavoidable impact would be less than under the Project.

11. Transportation and Traffic

Because less total land area would be available for development along Main Street, Alternative 3 would generate incrementally fewer trips than the Project. As shown in **Table 5-9, Comparison of the Project to Alternative 3 - Significant LOS Impacts**, Alternative 3 would have the effect of reducing LOS impacts at the intersection of Main Street/Mountain Boulevard to a likely significant level. Alternative 3 would increase traffic levels at the intersections of Main Street/Center Street and Old Mammoth Road/Tavern Road to potentially significant levels not experienced under the Project. Table 5-9 indicates that LOS impacts would increase under this Alternative. Although mitigation measures (signals) would reduce impacts to less than significant levels, signals on Main Street must be approved by Caltrans. As with the Project LOS impacts would remain significant and unavoidable at Main Street intersections. In addition, impacts at two additional intersections would increase. Therefore, impacts under Alternative 3 would be greater than under the Project.

Table 5-9

**Comparison of the Project (Scenario 6) to Alternative 3
Significant LOS Impacts**

No.	Impacted Intersection	Project	Alternative 3
3	Main Street/Mountain Boulevard	X	Remain an impact
4	Main Street/Post Office	X	X
5	Main Street/Center Street		Possible new impact
6	Main Street/Forest Trail	X	X
7	Main Street/Laurel Mountain Road	X	X
11	Old Mammoth Road/Tavern Road		Possible new impact
12	Old Mammoth Road/Sierra Nevada Road	X	X
19	Old Mammoth Road/Minaret Road/Fairway Drive	X	X

Source: LSC Transportation Consultants, 2016.

As with the Project, Alternative 3 would be consistent with AB 1358, which requires municipalities to craft a specific network of travel options through an adopted General Plan circulation element and requires that land use patterns support the effectiveness of a multimodal transportation network. The elimination of the Main Street Plan under Alternative 3, however, would not provide the same pedestrian improvements along Main Street as under the Project and, as such, Alternative 3 would not support AB 1358 to the same extent as the Project. As with the Project, Alternative 3 would be consistent with AB 743, which is intended to support residential/mixed-use densification for the purpose of inducing greater pedestrian and other multi-modal

activity and, thus, reduce vehicle miles travelled. However, because Alternative 3 would generate incrementally less development and densification in the Town's commercial areas than the Project, it would be considered to have a greater impact with regard to these adopted State guidelines. As with the Project, impacts with respect to State transportation guidelines would be less than significant

12. Utilities

a. Water

(1) Infrastructure

Alternative 3 would result in incremental growth in the Town's commercial districts compared to the General Plan buildout and, as with the Project, impact the capacity of water mains within and beyond the Town's commercial districts. The Water Code requires adequate delivery systems and the payment of development fees, which would support necessary new or upgraded water mains and other water infrastructure. It is expected that any necessary upgraded water mains would be site-specific or related to specific development projects. The site-specific scope of construction and the required review and approval of all water main construction projects by the MCWD would ensure that appropriate construction practices, including dust and erosion control and other requirements of the Town of Mammoth Lakes Municipal Code Title 15 would be followed and that the construction of site-specific water mains and connections would not result in significant environmental impacts. As with the Project, it is not expected that any currently unplanned water treatment systems would be required as a result of the Alternative 3. The MCWD's projected water treatment capacity is consistent with buildout demand and, although existing treatment facilities and water mains may need to be upgraded through time, as with the Project, Alternative 3 would not require extensive construction of new lines or treatment plant in areas that are not currently served. As such, large scale or disruptive construction projects beyond regular maintenance are not anticipated. As with the Project, environmental impacts associated with construction of new delivery and treatment systems would be less than significant. However, because Alternative 3 would result in approximately 6.8 percent fewer residential units, 8.5 percent fewer lodging units, and 18.9 less commercial floor area concentrated in the Main Street area than under the Project, impacts to water infrastructure and treatment systems in that area are anticipated to be incrementally less.

(2) Water Supply

Table 5-10, *Water Demand - Comparison of the Alternative 3 to the Project*, compares the total water demand of the Project to Alternative 3. The table represents the Project and the Reduced Intensity Alternative as incremental increases of the General Plan buildout. Based on extrapolated unit factors used by the MCWD to derive the UWMP's 2030 projections, Table 5-10 indicates that Alternative 3 would reduce total projected demand to 4,288 compared with 4,302 AFY under the Project. Alternative 3, as with the Project, would not exceed the cap of 4,387 AFY, which is the MCWD's existing maximum entitlement.

In 2015, the MCWD experienced the most severe drought year in its history. Currently there is uncertainty about the amount and timing of aquifer recharge, including sustaining or reaching the maximum cap of 4,387 AFY. Alternative 3, as with the Project, has the potential to exceed supply in times of extended drought. However, with the implementation of GPMM 4.11-1, which requires the Town to work with MCWD to ensure that land use approvals are phased and that water supply sources are determined prior to development approvals, as well as General Plan Policy R.4.A, which requires the Town to work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established

Table 5-10

Water Demand – Comparison of Alternative 3 to the Project

Use	Project		Reduced Intensity Alternative	
	Units/Floor Area	AFY	Units/Floor Area	AFY
Single Family	2,771	640	2,771	640
Multifamily	8,959 + 252 ^a = 9,211	1,520	8,959 + 235 = 9,194	1,517
Motel/Hotel	5,982 + 467 ^b + 84 ^c = 6,533	497	5,982 + 427 + 78 = 6,487	493
Commercial	1,365,002 sq. ft. + 152,533 ^d = 1,517,535 sq. ft.	395	1,365,002 sq. ft. + 127,567 = 1,492,569 sq. ft.	388
Institutional	48	103	48	103
Irrigation (including golf courses)	41	718	41	718
Additional Water Uses and Losses		429		429
AFY Totals:		4,302		4,288

^a Additional Multi-family units as a potential result of Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR. While the Town proposes a change from People At One Time (PAOT) and permanent/transient units, given the methodology used for water in the UWMP projected units resulting from the proposed Land Use Element/Zoning Code Amendments are broken out as permanent and transient in this table. As shown in Table 4.9-5, using the PAOT approach, 336 multifamily units could result with 252 permanent units and 84 transient units.

^b Additional hotel rooms as a potential result of the Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR.

^c Additional transient units as a potential result of the Land Use Element/Zoning Code Amendments as shown in Section 4.9, Table 4.9-5, of this Draft EIR. Please see note b above for a more detailed explanation regarding the methodology. Transient units are categorized as a hotel/motel use under the UWMP.

^d Additional commercial floor area that could result from the proposed Land Use Element/Zoning Code Amendments as discussed in Chapter 2, Project Description and shown in Table 2-3 of this EIR.

Source: ESA PCR, 2016. AFY is derived by multiplying units and floor areas by factors used in Table 2.12-7 of this EIR and Tables ES-4 and ES-5 of the UWMP.

prior to development approval, Alternative 3, as with the Project, would not exceed water supplies. Impacts with respect to water supplies would, therefore, be less than significant under both the Project and the Alternative 3. However, because the Alternative 3 would incrementally reduce demand compared to the Project, impacts with respect to water supply would be less.

b. Wastewater

(1) Infrastructure

Alternative 3 would incrementally reduce the Project's hotel and residential densities in the Town's commercial districts. Compared to the Project's population growth of approximately 1,978 over current General Plan buildout projections, Alternative 3 would generate an incremental population increase of approximately of 1,829 over General Plan estimates. Although any increase has the potential to exceed the capacity of the existing lines serving the Town's commercial districts or to adversely impact any downstream sewer line capacities or deficiencies, Alternative 3 would have incrementally less impact than under the Project. As with the Project, impacts to sewer lines would be addressed by the Sanitary Sewer Code, under which no building permits would be issued for uses that would exceed the capacity of specific sewer lines, and through Mitigation Measure WW-1, which requires the applicant for any building permit to install improvements that would comply with Division VII of the Sewer Code. Under both the Project and

Alternative 3, impacts to wastewater infrastructure would be less than significant. However, because Alternative 3 would incrementally reduce the Project's population gain and demand on sewer lines serving the commercial areas, impacts to sewer lines would be less than under the Project.

(2) Treatment Capacity

Alternative 3 would result in less development and population increase than under the proposed Land Use Element/Zoning Code Amendments. The incremental population increase of 1,829 people compared to General Plan buildout that could occur under Alternative 3 would generate approximately 157,294 gpd or approximately 173 AFY. Total demand for treatment would increase from the MCWD's projected 2,330 AFY under General Plan buildout to 2,503 AFY. As with the Project, the Alternative 3 would generate less wastewater than the MCWD's estimated treatment capacity of 4.9 mgd or approximately 5,488 AFY. Both the Alternative 3 and the Project (which would increase demand to approximately 2,517 AFY) would have less than significant impacts with respect to wastewater treatment. However, because Alternative 3 would reduce total demand compared to the Project, it would have less impact with respect to wastewater treatment than the Project.

c. Stormwater

Under Alternative 3 development of the Town's vacant parcels in the commercial districts would occur. However, implementation of Alternative 3 would potentially result in less total development along Main Street than could potentially occur under the Project with the implementation of the Main Street Plan. Any decrease in permeability associated with development of the Town's vacant lands, such as building foundations, driveways, and other paved surfaces in the Main Street and Old Mammoth Road commercial districts would increase surface runoff that could affect the Town's existing drainage systems, which were identified in the 2015 Stormwater Management Plan (SMP) as potentially deficient. As with the Project, stormwater impacts under Alternative 3 would be reduced to a less than significant level through drainage impact fees, design measures such as landscaped buffers and infiltration devices, and MM STRM-1, which would require the determination of peak surface runoff for all private projects and implementation of suitable infiltration devices. Alternative 3 would generate incrementally less growth in the Town's commercially-zoned districts than anticipated under the Land Use Element/Zoning Code Amendments and, as such, would have less impact with respect to stormwater facilities. The Mobility Element Update also has the potential to increase surface runoff and increase flow into the Town's storm drain system. New road construction would require consistency with the Department of Public Works' Standards and all new public streets, sidewalks, and trails projects must provide drainage facilities. Mitigation measures for the Trails System Master Plan and the Town's Standards for public works projects would reduce potential adverse impacts of the Mobility Element Update on the Town's existing drainage system to a less than significant level. However, under Alternative 3, street and drainage improvements would not be developed on Main Street and effects on stormwater collection systems would be greater than under the Project.

d. Solid Waste

Alternative 3 would increase the estimated population growth under the General Plan buildout but to a lesser extent than the Project. The incremental increase of 313 residential units, 427 lodging units, and approximately 346 employees (associated with 127,567 square feet of retail space) over the General Plan buildout under Alternative 3 would result in a net increase of approximately 1,993 tons of solid waste a year. The Project would result in a net increase of approximately 2,387 tons of solid waste per year over General

Plan buildout. Any increase in solid waste demand has the potential to impact existing landfill facilities. The current landfill, Benton Crossing Landfill, is scheduled for closure. However, the County is planning for three future alternative sites and potential trucking to alternative landfill sites. In addition, with increasing diversion techniques to reduce the waste stream and the conclusion of the County General Plan Update that impacts on solid waste facilities would be less than significant, it is expected that the Project would have a less than significant impact relative to solid waste facilities. In addition, the Town will continue to operate waste collection and recycling to increase the statewide recycling rates to 75 percent by 2020. While both Alternative 3 and the Project would result in an increase in population in the Town's commercial districts, neither would conflict with applicable federal, state and local policies and regulations regarding solid waste. Impacts under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would generate an incrementally smaller increase in solid waste than the Project, impacts to solid waste facilities under this Alternative would be less than under the Project.

C. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

Alternative 3 would increase the Project's significant and unavoidable LOS traffic impacts on Main Street by possibly creating a new significant impact at Main Street and Center Street. As with the Project, a significant and unavoidable impact would occur if Caltrans does not agree to signals and other improvements that, otherwise, serve as mitigation for LOS traffic impacts on that street. Alternative 3 would also possibly cause a new significant LOS impact at Old Mammoth Road and Tavern Road. It would also incrementally reduce but not avoid the Project's significant and unavoidable air quality impacts and significant and unavoidable impacts with respect to parks and recreational facilities. Because Alternative 3 would result in slightly less new development, impacts associated with noise, fire services, police services, schools, water supply, wastewater, and solid waste would be slightly less under Alternative 3. Because improvements would not occur within the vacated frontage road, impacts related to biological, and cultural resources would be slightly less than under the Project. As with the Project, impacts associated with services would be less than significant, or mitigated to less than significant levels. Impacts related to forestry resources would be the same as under the Project. However, without curb and gutter, and other improvements along Main Street, Alternative 3 would have greater impact with respect to stormwater. Alternative 3 would incrementally reduce the Project's less than significant aesthetic impact related to construction, light and glare and shading, but would increase the Project's less than significant impact related to visual character. Alternative 3 would implement the Mobility Element Update; however, with the exclusion of the Main Street Plan, Alternative 3 would not contribute to the Town's land use objective to create a vibrant and walkable downtown area to the same extent as the Project. In addition, while Alternative 3 would slightly reduce several of the Project's less than significant impacts, it would not meet the Project's primary objectives to the same degree (see Table 5-12, below). Alternative 3 would meet the objectives of the Project to amend the Land Use Element policy and text associated with regulating population growth from a PAOT approach to an impact assessment based approach. The Alternative would meet the Town's objectives to delete the CBIZ and modify TDR policies and, as such, would meet the Town's objective to streamline the planning process to encourage economic development. Because Alternative 3 would adopt the Mobility Element Update, as with the Project, it would meet the objective to create a downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles traveled. In addition, as with the Project, through the adoption of the Mobility Element Update, Alternative 3 would meet the Town's objective to achieve a progressive and comprehensive multimodal transportation system that is connected, accessible, and safe.

G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes the No Project Alternative (Alternative 1), Reduced Intensity Alternative (Alternative 2), and the Mobility Element Without the Main Street Reconfiguration Alternative (Alternative 3).

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table 5-11, *Comparison of Impacts Associated with the Alternatives and Impacts of the Project***, below, based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous sections. Pursuant to Section 15126.6(c) of the State *CEQA Guidelines*, the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

As discussed above, and as shown in Table 5-11, the No Project Alternative is considered the overall environmentally superior Alternative as it would incrementally reduce the Project’s significant and unavoidable traffic, air quality and parks and recreation impacts. However, these impacts would remain significant and unavoidable.⁵ It should be noted however, that although some adverse impacts would be avoided under the No Project Alternative, several primary beneficial aspects of the Project with respect to the objectives of the General Plan would not be achieved. The No Project Alternative would not implement,, for instance, objectives of the Land Use Element to enhance livability of districts for walking through the arrangement of land uses and development intensities (Goal L.3); or to provide an overall balance of uses, facilities, and services to further the town’s role as a destination resort community (Goal I.5) to the same extent as the Project. The No Project Alternative would not achieve the visual character benefits of the Project. As indicated above, the No Project Alternative would not meet the Project objectives. The extent to which the remaining Project Alternatives would meet the Project’s Objectives is summarized in **Table 5-12, *Comparison of Alternatives - Ability to Meet Project Objectives***.

Based on Table 5-12, the Reduced Intensity Alternative would partially meet the objectives of the Project and also incrementally reduce the Project’s less than significant impacts related to air quality, noise, public services and utilities. It would also incrementally reduce the Project’s significant and unavoidable impact related to air quality and parks and recreational facilities. However, it would not reduce these impacts to less than significant levels. Although it would not implement the objectives of the General Plan to the same extent as the Project, because it involves less development than Alternative 3, it would be the environmentally superior to that Alternative. Therefore, in accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior alternative other than the No Project Alternative, a

⁵ *The No Project Alternative is the same as the 2007 General Plan buildout which would result in significant and unavoidable air quality and recreation impacts. The 2007 General Plan EIR concluded that traffic impacts would be mitigated to less than significant levels. While the current Traffic Impact Analysis, which is based on an updated Town Traffic Model, concludes that significant impacts could be mitigated to less than significant levels, because CalTrans approval would be required to implement the mitigation measures on Main Street and such approval is uncertain, this EIR concludes that traffic impacts would be considered significant and unavoidable.*

comparative evaluation of the remaining alternatives indicates that the Reduced Intensity Alternative would be the environmentally superior alternative.

**Table 5-11
Comparison of Impacts Associated with the Alternatives
and Impacts of the Project**

	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Intensity Alternative	Alternative 3 Mobility Element Update Without the Main Street Reconfiguration Alternative
1. Aesthetics				
Visual Character				
Construction	Less than Significant	Less Impact	Similar Impact	Less Impact
Operation	Less than Significant	Greater Impact	Greater Impact	Greater Impact
Views	Less than Significant	Less Impact (No Impact)	Similar Impact	Less Impact
Light and Glare	Less than Significant	Less Impact	Less Impact	Less Impact
Shade/Shadow	Less than Significant	Less Impact	Similar Impact	Less Impact
2. Air Quality				
Violation of Air Quality Standards (Criteria Pollutants)				
Construction	Significant and Unavoidable	Similar Impact (Significant and Unavoidable)	Similar Impact (Significant and Unavoidable)	Similar Impact (Significant and Unavoidable)
Operation	Significant and Unavoidable	Less Impact (Less than Significant)	Similar Impact (Significant and Unavoidable)	Similar Impact (Significant and Unavoidable)
CO and TACs Emissions	Less than Significant	Less Impact (Less than Significant)	Similar Impact	Similar Impact
Consistency with Air Quality Management Plan	Less than Significant	Less Impact	Similar Impact	Similar Impact

Table 5-11 (Continued)

**Comparison of Impacts Associated with the Alternatives
and Impacts of the Project**

	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Intensity Alternative	Alternative 3 Mobility Element Update Without the Main Street Reconfiguration Alternative
Air Quality Violation or Cumulative Considerable Increase in Non-Attainment Criteria Pollutant	Significant and Unavoidable	Similar Impact (Significant and Unavoidable)	Similar Impact (Significant and Unavoidable)	Similar Impact (Significant and Unavoidable)
3. Forestry Resources	Less than Significant	Less Impact	Similar Impact	Similar Impact
4. Biological Resources	Less than Significant	Less Impact	Similar Impact	Less Impact
5. Cultural Resources	Less than Significant	Less Impact	Similar Impact	Less Impact
6. Greenhouse Gas Emissions	Less than Significant	Similar Impact	Similar Impact	Similar Impact
7. Land Use	Less than Significant	Greater Impact	Greater Impact	Greater Impact
8. Noise				
Construction Noise	Less than Significant	Similar Impact	Similar Impact	Less Impact
Operation Noise	Less than Significant	Similar Impact	Similar Impact	Less Impact
Construction Vibration	Less than Significant	Similar Impact	Similar Impact	Less Impact

Table 5-11 (Continued)

**Comparison of Impacts Associated with the Alternatives
and Impacts of the Project**

	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Intensity Alternative	Alternative 3 Mobility Element Update Without the Main Street Reconfiguration Alternative
9. Population, Housing and Employment	Less than Significant	Similar Impact	Similar Impact	Less Impact
10. Public Services				
Fire Protection and Emergency Services				
Construction	Less than Significant	Less Impact	Less Impact	Less Impact
Operation	Less than Significant	Less Impact	Less Impact	Less Impact
Emergency Access (Operation)	Less than Significant	Greater Impact	Similar Impact	Similar Impact
Police Protection				
Construction	Less than Significant	Less Impact	Less Impact	Less Impact
Operation	Less than Significant	Less Impact	Less Impact	Less Impact
Schools	Less than Significant	Less Impact	Less Impact	Less Impact
Parks and Recreation	Significant and Unavoidable	Less Impact (Significant and Unavoidable)	Less Impact (Significant and Unavoidable)	Less Impact (Significant and Unavoidable)

Table 5-11 (Continued)

**Comparison of Impacts Associated with the Alternatives
and Impacts of the Project**

	Project Impact	Alternative 1 No Project Alternative	Alternative 2 Reduced Intensity Alternative	Alternative 3 Mobility Element Update Without the Main Street Reconfiguration Alternative
4.11 Transportation and Traffic				
Intersection Service Levels	Significant and Unavoidable	Less Impact (Significant and Unavoidable)	Less Impact (Significant and Unavoidable)	Greater Impact (Significant and Unavoidable)
Consistency with Plans	Less than Significant	Greater (Less than Significant)	Similar	
4.12 Utilities and Service Systems				
Water Supply	Less than Significant	Less Impact	Less Impact	Less Impact
Wastewater	Less than Significant	Less Impact	Less Impact	Less Impact
Stormwater	Less than Significant	Less Impact	Similar Impact	Greater Impact
Solid Waste	Less than Significant	Less Impact	Less Impact	Less Impact

Note: Statements in parentheses indicate whether there would continue to significant and unavoidable impacts, or if the category differs from the Project. Statements not in parentheses indicate whether impacts would be less, similar, or greater than the project but within the same category.

Source: ESA PCR, 2016

Table 5-12

Comparison of Alternatives - Ability to Meet Project Objectives

PROJECT OBJECTIVES & CRITERIA	Alternative 1 No Project			Alternative 2 Reduced Intensity Alternative			Alternative 3 Mobility Element Update Without the Main Street Reconfiguration Alternative		
	Yes	Partial	No	Yes	Partial	No	Yes	Partial	No
1. The intent of the proposed Land Use Element\ Zoning Code Amendments as well as the Mobility Element Update is to achieve a sustainable and integrated system of land use and transportation in the Town of Mammoth Lakes.			X		X			X	
2. Create flexibility in the commercial districts through the removal of the unit/room cap and the creation of a “white box” established by development parameters, which focuses on the overall size of a structure.			X		X			X	
3. Streamline the planning process to encourage economic development.			X		X			X	
4. Cluster greater density in the downtown area to reduce vehicle miles travelled.			X		X			X	
5. Create a park-once downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles travelled.			X	X			X		
6. Create a vibrant and walkable downtown area.			X		X				X
OBJECTIVES SCORE	0	0	6	1	5	0	1	4	1

Source: ESA PCR, 2016.

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