3.0 INITIAL STUDY CHECKLIST

1. Project Title:	Whitmore Park Track and Sports Field Project
2. Lead Agency Name and Address:	Town of Mammoth Lakes P.O. Box 1609 437 Old Mammoth Road, Suite R Mammoth Lakes, CA 93546
3. Contact Person and Phone Number:	Ms. Jen Daugherty Associate Planner (760) 934 8989 ext. 260 jdaugherty@ci.mammoth-lakes.ca.us
4. Project Location and Setting:	The 23.75-acre Project site is located on the west side of Benton Crossing Road, near Highway 395, within the Whitmore Regional Park area in Mono County, California. The Project site is within a larger property addressed as 575 Benton Crossing Road (Assessor Parcel Number 060-080-002). The local vicinity is an area of high geothermal activity and contains several hot springs. Surrounding land uses consist of the Whitmore Park swimming pool across Benton Crossing Road to the northeast, undeveloped open space to the north and west (Doe Ridge), and undeveloped open space land to the south. Also see Chapter 2, Project Description.
5. Project Sponsor:	Town of Mammoth Lakes and High Sierra Striders
6. Description of Project	See Chapter 2, Project Description
7. General Plan Designation:	The Project site is designated as Open Space (OS) by the Mono County General Plan. The Mammoth/June Lake Airport Land Use Plan designated the site Industrial/Public Agency (PA).
8. Zoning	The project site is zoned as Open Space (OS) and Industrial/Public Agency as identified in the Mammoth/June Lake Airport Land Use Plan.
9. Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement):	See Section 2.5, Agreements, Permits and Approvals.

3.1 PUBLIC SCOPING, ISSUES, AND CONCERNS

A public scoping period was held for the Project to provide an opportunity for early input from responsible agencies and interested parties to identify the range of potential environmental issues to be analyzed in the Initial Study. The public scoping period lasted from July 13, 2010 to August 13, 2010, and a public scoping meeting was held on August 11, 2010.

Written comments were received from California Department of Transportation, District 9, and Dan Dawson of the Sierra Nevada Aquatic Research Laboratory (SNARL). Additional verbal comments were raised at the public scoping meeting. The potential issues and concerns identified in these comments are:

- Concerns with the track and field and parking lot outdoor lighting related to night skies, glare, and impacts on surrounding uses and users (e.g. SNARL, drivers on U.S. Highway 395 and Benton Crossing Road, Mammoth-Yosemite Airport, and recreationalists).
- Vegetation removal.
- Verify that traffic volumes would remain acceptable on U.S. Highway 395.
- Consider analyzing the Project for year round operations in case year round use is desirable in the future.

These comments have been included in the discussion of potential environmental impacts in this Initial Study/Mitigated Negative Declaration.

3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (✓) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact With Mitigation Incorporated" as indicated by the checklist on the following pages.

✓	Aesthetics		Greenhouse Gas Emissions		Population and Housing
	Agricultural and Forestry Resources	✓	Hazards and Hazardous Materials	✓	Public Services
✓	Air Quality	✓	Hydrology and Water Quality	✓	Recreation
✓	Biological Resources	✓	Land Use and Planning	✓	Transportation and Traffic
✓	Cultural Resources		Mineral Resources	✓	Utilities and Service Systems
✓	Geology and Soils	✓	Noise	✓	Mandatory Findings of Significance

3.3 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	✓
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potential significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Jennifer Daugherty — 10/13/10

Signature — Date

Jen Daugherty — Town of Mammoth Lakes

Printed Name — For

3.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures "Earlier Analysis," as described in (5) below, may be cross-referenced).

5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The analysis of each issue should identify:

   a. the significance criteria or threshold, if any, used to evaluate each question; and

   b. the mitigation measure identified, if any, to reduce the impact to less than significance.

4.0 ENVIRONMENTAL ANALYSIS

The following is a discussion of potential project impacts as identified in the Initial Study/Mitigated Negative Declaration. Explanations are provided for each item. For purposes of the environmental analysis, a "worst-case" scenario for the proposed Project was assumed. The "worst-case" scenario is defined as complete construction of all phases of the Project, which would result in the construction of a track and sports field complex with accessory structures and surface parking.

4.1 AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?		✓		
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		✓		
c. Substantially degrade the existing visual character or quality of the site and its surroundings?		✓		
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?		✓		

a. Have a substantial adverse effect on a scenic vista?

The Project site is generally flat and level with an elevation range of approximately 7,010 to 7,020 feet. The proposed track, field, and associated facilities would be located in the north portion of the site, at the toe of Doe Ridge. The Project site does not contain any prominent ridgelines, land or water courses, or significant stands of trees.

The Project site is approximately ½ mile from U.S. Highway 395, which is designated as a scenic highway. Also, Benton Crossing Road, which would provide access to the Project site, is a County scenic highway[4]. Therefore, the Project is subject to land use regulations for the Scenic Combining District and State Scenic Highway (S-C district). The S-C district is intended to regulate development activity in scenic areas outside of communities in order to minimize potential visual impacts. Use of the S-C district is encouraged in areas adjacent to

[4] Mono County Master Environmental Assessment (2001).

and visible from designated scenic highways as well as in other important scenic areas[5]. The Project site is visible from portions of both Benton Crossing Road and U.S. Highway 395.

The vicinity of the Project site is scenic in character with scenic views and vistas. Views across the Project site from Benton Crossing Road are shown in Exhibit 4-1a. The views to the southwest include open undeveloped sagebrush scrub with Mount Morrison and Laurel Mountain in the background. Doe Ridge provides the backdrop to the Project site when looking west from Benton Crossing Road. Views of the Project site from U.S. Highway 395 are shown in Exhibit 4-1c (View 1). Open sagebrush scrub, Doe Ridge, and distant mountains are visible when looking northeast from U.S. Highway 395 toward the Project site. Crowley Lake is visible in the background when looking west over the Project site from Doe Ridge (Exhibit 4-1c, View 4). Additional views are shown from other locations, such as SNARL, Mount Morrison Road, and the Project site, in Exhibits 4-1a through 4-1d.

The Whitmore Regional Park contains three ball fields, an animal shelter, a restroom building, and gravel and dirt access drives and parking areas. A substantial portion of the site that would be developed with the Project is disturbed from dirt access drives, parking areas, and park maintenance and storage areas. The white parks maintenance storage units are clearly visible in Exhibit 4-1d, View 3. Construction and operation of the Project would utilize the existing dirt access drives and parking areas to the maximum extent feasible. The grade of the site would generally be maintained, with approximately 4,130 cubic yards of cut and 3,350 cubic yards of fill to achieve a level track and field facility. The Project includes installing permanent landscaping, erosion control, and re-vegetating areas newly disturbed during construction. No trees are anticipated to be removed with the Project.

The height of the concession building would be approximately 20 feet and would utilize colors and materials that would blend with the surrounding natural environment, and would be compatible with the existing animal shelter building. Also, fencing is included in the Project that would also be constructed of natural materials, such as wood, and utilize natural colors.

Although the Project would include construction of a track and field facility, concessions building, surface parking and drives, lighting, and associated improvements, these Project components would be small in scale (no taller than 20 feet) and be located some distance from public roads and the highway ; therefore, they would not block or change the existing scenic character, views, or vistas. Nonetheless, in order to minimize any potential effects of the proposed Project on scenic views and vistas, Mitigation Measure AES-1 is included to ensure such impacts would be mitigated to a less than significant level.

[5] Mono County General Plan, Land Use Element, Development Standards, Chapter 8 (2009).

Mitigation Measure

AES-1: The Project shall conform to all standards for the Scenic Combining District and State Scenic Highway (S-C district):

a. Visually offensive land uses shall be adequately screened through the use of extensive site landscaping, fencing, and/or contour grading.

b. The natural topography of a site shall be maintained to the extent possible. Earthwork, grading, and vegetation removals shall be minimized. Existing trees and native ground cover should be protected during construction.

c. All site areas disturbed during Project construction shall be revegetated and maintained with plants that blend with the surrounding natural environment, preferably local native plants (drought resistant indigenous plants are encouraged), or other permanent erosion control installed. A landscape plan shall be submitted and approved for all projects.

d. Existing access roads shall be utilized whenever possible. Construction of new access roads, frontage roads, or driveways shall be avoided except to provide safe access to the Project's facilities.

e. New structures shall be situated on the property so as, to the extent feasible, their visibility from the state scenic highway is minimized. Structures shall be clustered where possible, leaving remaining areas in a natural state, or landscaped to be compatible with the scenic quality of the area.

f. The number, type, size, height, and design of on-site signs shall be regulated according to the applicable county sign regulations. Signs shall be compatible with the natural surroundings in color, shape, and scale. No sign shall be placed or constructed in such a manner that it silhouettes against the sky above the ridgeline or blocks a scenic viewshed.

g. The design, color, and materials for buildings, fences and accessory structures shall be compatible with the natural setting.

    i. Roofs visible from State Scenic Highway 395 shall be a dull or matte finish and in dark muted colors.

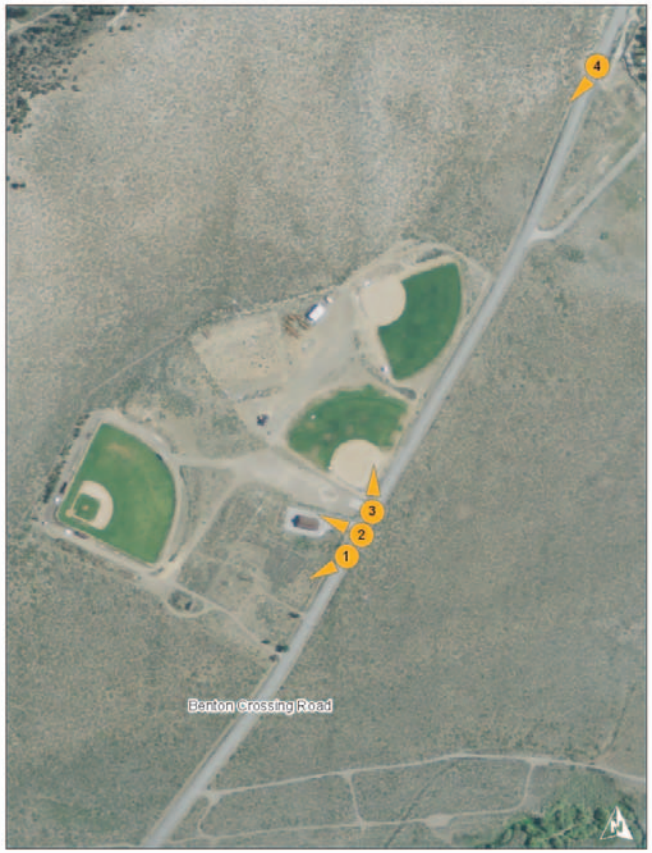
    ii. Vertical surfaces of structures should not use contrasting colors or materials and shall blend with the natural surroundings. Dark or neutral colors found in immediate surroundings are strongly encouraged for vertical surfaces and structures.

h. Fencing and screening shall not contrast in color, shape, and materials with the natural surroundings. The use of landscaping to screen utility areas and trash containers is strongly recommended.

i. All new utilities shall be installed underground.

j. Exterior lighting shall be shielded and indirect and shall be minimized to that necessary for security and safety. Light sources in exterior fixtures shall be shielded, down-directed, and not visible from State Scenic Highway 395 or Benton Crossing Road.

Also see Sections 4.1.b through 4.1.d, below. Therefore, the Project would have a ***less than significant impact with mitigation incorporated*** on scenic vistas.



View 1: Looking southwest from Benton Crossing Road

View 2: Looking west across Project Site from Benton Crossing Road

View 3: Looking northwest from Benton Crossing Road

View 4: Looking southwest across Project Site from Benton Crossing Road (by Whitmore Pool)

Whitmore Park Track and Sports Field
Initial Study/Mitigated Negative Declaration

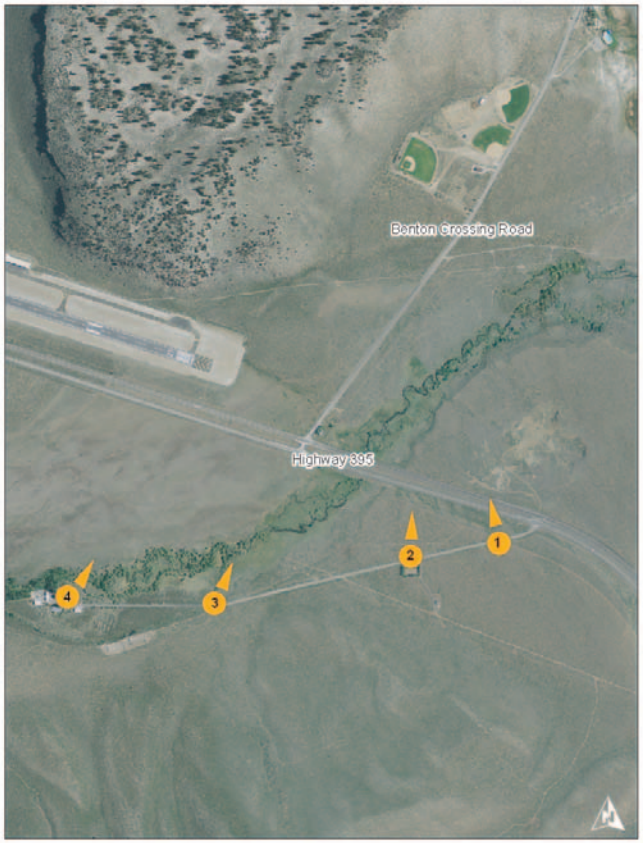
Exhibit 4-1a: Site Photographs

1 View Number

View Direction

NOT TO SCALE

Town of Mammoth Lakes



View 1: Looking northwest towards Project Site from high point on Mt. Morrison Road

View 2: Looking north towards Project Site from Mt. Morrison Cemetary on Mt. Morrison Road

View 3: Looking northeast towards Project Site from SNARL entrance on Mt. Morrison Road

View 4: Looking northeast towards Project Site from second story balcony at SNARL Headquarters

Whitmore Park Track and Sports Field
Initial Study/Mitigated Negative Declaration

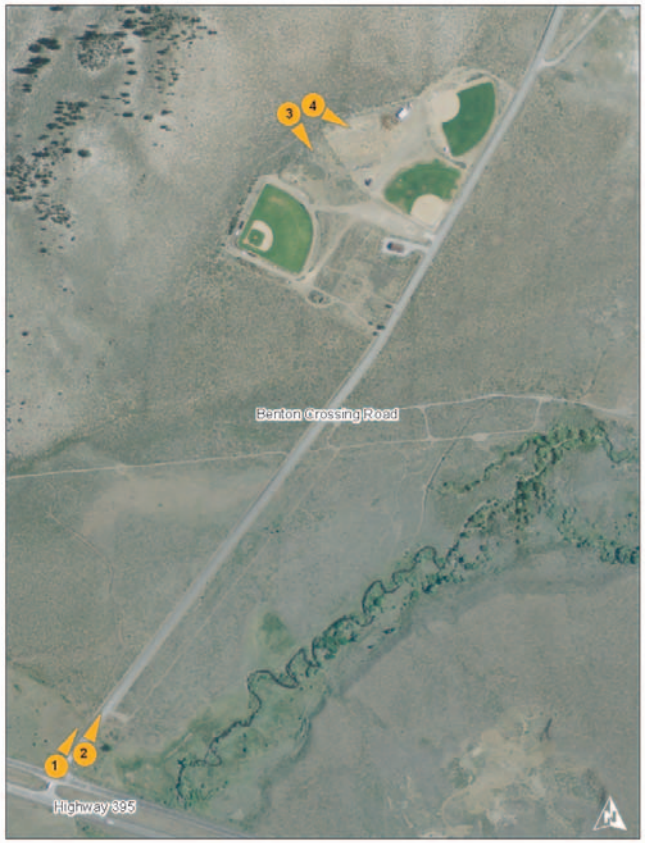
Exhibit 4-1b: Site Photographs

1 View Number

View Direction

NOT TO SCALE

Town of Mammoth Lakes



View 1: Looking northeast towards Project Site from U.S. Highway 395

View 2: Looking northeast towards Project Site from the Green Church on Benton Crossing Road

View 3: Looking southeast across Project Site during the 2010 High Sierra Fall Century event

View 4: Looking southeast across Project Site during the 2010 High Sierra Fall Century event

Whitmore Park Track and Sports Field
Initial Study/Mitigated Negative Declaration

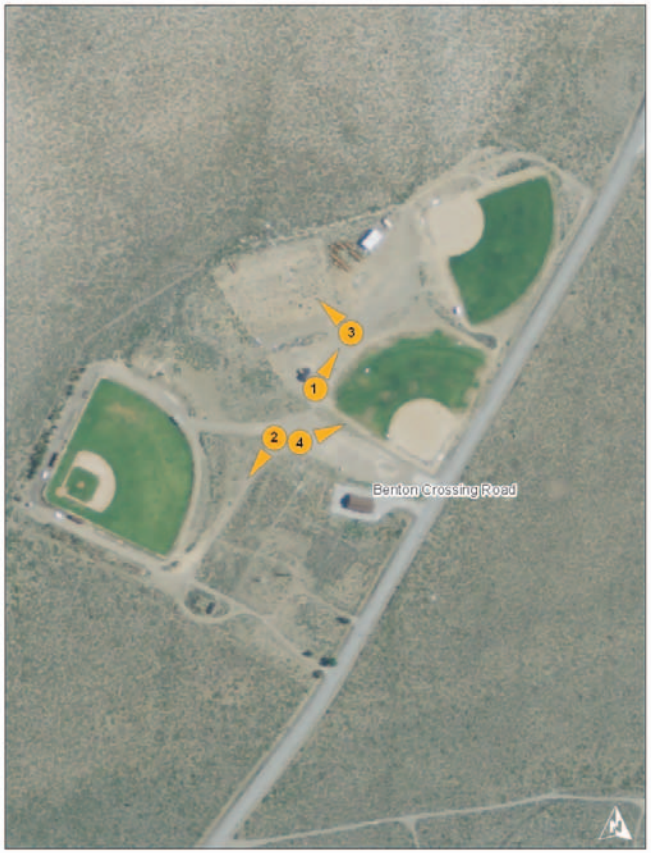
Exhibit 4-1c: Site Photographs

1 View Number

View Direction

NOT TO SCALE

Town of Mammoth Lakes



View 1: Disturbed area between Field 1 and proposed track area

View 2: Disturbed drive area on Project Site looking southwest

View 3: View of proposed track area looking northeast

View 4: View of existing lighting for Field 1

Whitmore Park Track and Sports Field
Initial Study/Mitigated Negative Declaration

Exhibit 4-1d: Site Photographs

1 View Number

View Direction

NOT TO SCALE

Town of Mammoth Lakes

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Scenic highways are any freeway, highway, road, street, boulevard, or other public right-of-way which traverses an area of unusual scenic quality and has been designated as a scenic highway by the County and/or the State[6]. The State of California has designated U.S. Highway 395 as a scenic highway, and Mono County has designated Benton Crossing Road as a County scenic highway. Therefore, the Project is subject to land use regulations for the Scenic Combining District and State Scenic Highway (S-C district), as described in 4.1.a, above.

The Project site does not include significant trees, rock outcroppings, or historic buildings. Please also see Sections 4.1.a, 4.1.c, and 4.1.d. Therefore, the Project would have a ***less than significant impact with mitigation incorporated*** on scenic resources.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

As stated in Section 4.1.a, a substantial portion of the Project site is disturbed and existing dirt access drives and parking areas would be utilized to the maximum extent feasible to minimize disturbance to the natural environment. The proposed concessions building would be similar in size, scale, and character to those existing on the Project site. The Project would improve the visual character of the site by installing permanent landscaping and re-vegetating or installing permanent erosion control in newly disturbed areas. No trees are anticipated to be removed with construction or operation of the Project.

Short-Term Construction: Construction activities and materials would be visible on the Project site during construction phases including graded surfaces, construction debris and stockpiling, construction equipment, and truck traffic. Construction activities would potentially be visible from U.S. Highway 395, Benton Crossing Road, and from above, such as from airplanes. Construction-related impacts are anticipated to be short-term for each construction phase, and would cease upon completion of each phase. Although construction would temporarily change the visual character of the site, the change would not be significant due to the scale, short length of construction, and because the site of construction is setback from Benton Crossing Road and U.S. Highway 395; this would result in a negligible effect on views of the site from these public roads. Nonetheless, Mitigation Measure AES-2 is included to ensure such impacts would be mitigated to a less than significant level.

[6] Mono County General Plan, Conservation/Open Space Element (1993).

Long-Term Operations: While the proposed Project would alter the character of the site, it would not substantially degrade the site or its surroundings. The scale and character of the Project would be similar to those of the existing recreational facilities in the Whitmore Regional Park area (please see Mitigation Measure AES-1).

Mitigation Measure

AES-2: Construction stockpiling and staging areas shall be located to be the least visible from scenic highways, as feasible.

Also see Sections 4.1.a, 4.1.b, and 4.1.d. Thus the Project would have a ***less than significant impact with mitigation incorporated*** on the visual character or quality of the site and its surroundings.

d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

The Mono County General Plan, Chapter 23, *Dark Sky Regulations*, provides rules and regulations for outdoor lighting to prevent nuisances caused by unnecessary light intensity, direct glare and light trespass, and to protect the ability to view the night sky by restricting unnecessary upward projection of light. All outdoor lighting fixtures, including recreational lighting fixtures, are required to conform to these regulations.

The Mammoth/June Airport Land Use Plan (ALUP) and the California Airport Land Use Planning Handbook (Handbook) include requirements and general guidance related to lighting in proximity to airports. The ALUP identifies any use that would direct a steady or flashing light toward an aircraft engaged in take-off or landing as an incompatible use. The Handbook identifies, "Visual hazards include distracting lights (particularly lights which can be confused with airfield lights), glare, and sources of smoke."

Currently, there is existing ball field lighting (Field 1) and a scoreboard (Field 3) on the Project site, but these lights are rarely used. However, it is anticipated that these lights will be used more frequently in the future. The existing infield lights are approximately 50 feet tall and the outfield lights are approximately 60 feet tall. The Mono County General Plan does not allow for heights above 60 feet[7].

The stadium lighting originally considered for the track and field was four 80 foot tall light poles; however, these lights would not conform to Mono County's height requirements (maximum 60 feet). Therefore, a lighting configuration consistent with Mono County regulations will be utilized for the track and field (see Mitigation Measures AES-3, 4 and 5, below). The parking and driveway lighting would conform to the Town of Mammoth Lakes standard, which is a shielded and down-directed pole light at a maximum of 24 feet in height.

[7] Mono County General Plan, Land Use Element, 04.110.E Building height (2009).

The area immediately surrounding the Project site is undeveloped, which allows for generally undisturbed views of the night sky in the vicinity. Potential long-term light sources from the Project would include track and field lighting, parking area lighting, and low levels of interior lighting that would emanate from the concessions building. A scoreboard may also be included in the Project. Also, automobile headlights associated with the driveway and parking area would further influence lighting in the Project area.

The nearest light sensitive receptors to the Project site are drivers on Benton Crossing Road and U.S. Highway 395, the Mammoth Yosemite Airport, the Sierra Nevada Aquatic Research Laboratory (SNARL) that includes housing for researchers on the south side of U.S. Highway 395, the Green Church (used for classes and is part of the SNARL campus), and users of surrounding lands (e.g. hot springs/tubs users, hikers, fishermen, cross country skiers, etc).

Table 4.1-1: Light Sensitive Receptors

Light Sensitive Receptor	Distance from Project Site [A]	Elevation [B]	Elevation Between Receptor and Project Site [C]
Benton Crossing Road	0 mile	7,011 feet	-4 feet
Green Church	½ mile	7,034 feet	19 feet
U.S. Highway 395	½ mile	7,047 feet	32 feet
Airport [D]	½ mile	7,054 feet	39 feet
SNARL	1.1 miles	7,090 feet	75 feet
Users of surrounding lands	Range of distances	Range of elevations	Range of elevations

A. Approximate distances.

B. Approximate elevations obtained from www.earthtools.org.

C. Project site elevation averaged at 7,015 feet.

D. East end of Mammoth Yosemite Airport runway.

During the Initial Study scoping period, concerns were raised regarding potential impacts of parking lot and track and field lighting. Specific concerns about lighting impacts to the sensitive receptors listed in Table 4.1-1 were identified. However, the Project will generally operate spring to fall, during the longest periods of daylight, thereby minimizing the use of site lighting. In addition, since the users of surrounding lands are predominately day time users, they would not be significantly impacted by light and glare from the Project. However, the Project would contribute additional sources of light and glare above current conditions. With the incorporation of the following mitigation measures, the potential light and glare impacts on day and nighttime views would be less than significant.

Mitigation Measures

AES-3: Outdoor lighting for the Project shall be approved by Mono County. The Town of Mammoth Lakes and Mono County shall evaluate different options for track and field light fixtures, height, design, number, wattage, and placement, including but not limited to:

a. Consider low-level lighting for the track that would be separate from lighting for the field.

b. Consider restricting the hours of track and field use to limit the amount of time the lights are on.

AES-4: Outdoor lights shall be shielded so they do not negatively impact aircraft engaged in take-off or landing.

AES-5: Outdoor lighting shall be consistent with the Mono County General Plan, Chapter 23, *Dark Sky Regulations*, including regulations specific to Outdoor Performance, Sport and Recreation Facilities (23.090):

a. Where playing fields or other special activity areas are to be illuminated, lighting fixtures shall be mounted, aimed, and shielded so that their beams fall within the primary playing area and immediate surroundings, and so that no significant off-site light trespass is produced.

b. The main lighting shall be turned off as soon as possible following the end of an event. Where feasible, a low-level lighting system shall be used to facilitate patrons leaving the facility, cleanup, nighttime maintenance, and other closing activities.

AES-6: Construction-related lighting shall be limited to lighting necessary for security and safety purposes. All construction-related lighting shall be located and oriented away from scenic highways and consist of the minimal wattage necessary.

AES-7: Building materials shall be low-reflectivity (also see AES-1.g).

Also see Sections 4.1.a, 4.1.b, and 4.1.d, as well as, Mitigation Measure HAZ-1. Therefore, the Project would have a ***less than significant impact with mitigation incorporated*** related to light and glare.

4.2 AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project would have ***no impact*** related to the conversion of farmland to non-agricultural use.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Project site is zoned Open Space (OS) and Industrial/Public Agency (PA), and is not subject to Williamson Act contracts. Therefore, the Project would have ***no impact*** related to conflicts with zoning for agricultural use or Williamson Act contracts.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Public Resources Code section 12220(g) defines "Forest land" as land "that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." "Timberland" is defined by Public Resources Code 4526 as "land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."

The Project site is zoned Open Space (OS) and Industrial/Public Agency (PA), and not zoned as forest land or timberland as defined by Public Resources Code 4526. The OS zone is intended to protect and retain open space for future generations. These lands may be valuable for resource preservation, low-intensity recreational uses, mineral resources, or other reasons[8]. The PA zone is intended to define those lands with are utilized for regional recreation, natural resource development, institutional, and governmental uses[9]. The Project site is within the Whitmore Regional Park area and a substantial portion of the site is already disturbed. In addition, no significant stands of trees are located on the Project site, and no trees are anticipated to be removed with construction or operation of the Project. Therefore, there would be ***no impact*** related to forest or timberland.

[8] Mono County, General Plan, Land Use Element (2009).
[9] Mammoth/June Lake Airport Land Use Plan (1986).

d. Result in the loss of forest land or conversion of forest land to non-forest use?

Please see Section 4.2.c, above. Therefore, the Project would have ***no impact*** related to the loss of forest land or conversion of forest land to non-forest uses.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Please refer to responses Sections 4.2.a through d, above. No other changes to the existing environment would be caused by the Project that would result in conversion of Farmland or forest land; therefore, there would be ***no impact*** in this regard.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Conflict with or obstruct implementation of the applicable air quality plan?		✓		
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		✓		
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		✓		
d. Expose sensitive receptors to substantial pollutant concentrations?				✓
e. Create objectionable odors affecting a substantial number of people?				✓

Mono County is located within the Great Basin Valleys Air Basin (GBVAB), which also includes Inyo and Alpine Counties. Air quality in Mono County is governed by the Great Basin Unified Air Pollution Control District (GBUAPCD) and the California Air Resources Board (CARB). The Mono County portion of the GBVAB has a non-attainment status for ozone (State standards only); non-attainment of ozone is associated with the effect of transported pollution from outside of Mono County, rather than local generation of ozone

or ozone precursors. All of the GBVAB is designated non-attainment for the PM10 State standard.

Although Mono County is categorized as non-attainment for the state ozone standard, there is no ozone implementation plan for attainment in Mono County, nor is one required under State law. As outlined in the 2001 CARB Ozone transport review, the CARB classifies the contribution of transported pollution from one air basin to another to be either overwhelming, significant, inconsequential, or some combination of the three. The CARB Ozone Transport Review is a statewide assessment of ozone transport between air basins. According to the CARB, ozone levels should improve in the air basin only when substantial mitigation measures are more fully implemented in upwind air basins. Local sources are not considered to have a considerable impact on ambient levels due to the climactic patterns of the eastern slopes of the Sierra Nevada Mountains.

a. Conflict with or obstruct implementation of the applicable air quality plan?

In Mono County, transportation-related criteria pollutants occur only in Mammoth Lakes (PM10 emissions). As a result, the Air Quality Management Plan for the GBUAPCD and the State Implementation Plan (SIP) for Mono County do not include any transportation related requirements other than for the Town of Mammoth Lakes[10]. The Project site is not located within the Town of Mammoth Lakes. Mono County does not have a PM10 attainment plan that would apply to the Project[11].

The Mono County General Plan (Conservation/Open Space Element, Public Health and Safety policies) and the Mono County Grading Ordinance (Mono County Code Chapter 13.08) contain erosion control policies that would be applicable to the Project. Construction activities could potentially contribute to PM10 emissions, specifically during grading; however, by conforming to Mono County's General Plan and Grading Ordinance, the potential impact would be less than significant.

Since a substantial portion of the site is disturbed, construction of the Project could improve some aspects of air quality by paving existing dirt parking areas and installing permanent landscaping and erosion control, which would reduce soil erosion and dust. Some existing disturbed areas that are currently utilized for vehicle parking would be utilized by the Project for overflow parking areas. These overflow parking areas are not proposed to be paved. No undisturbed areas would be graded for overflow parking. A native hydroseed mix or other permanent erosion control would be applied to all new areas disturbed by Project construction. Although increased traffic from users of the Project may contribute to PM10 emissions, including an increased frequency of use of unpaved overflow parking areas, the

[10] Mono County, Regional Transportation Plan (2008 Update).
[11] Heather deBethizy, Mono County Community Development Department, email correspondence October 4, 2010.

amount of traffic generated is not anticipated to contribute substantially to the existing emission levels (see Section 4.16, Transportation and Traffic).

Also see Mitigation Measures AQ-1 through AQ-6, below. Therefore, the Project would result in a ***less than significant impact with mitigation incorporated***.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The track and field facility would be constructed in Phase one and would utilize the existing on-site dirt parking areas and access drives. The paving of the on-site parking areas and driveways is anticipated to occur in phases two and three. During the interim period between Phase one and phases two and three, it is expected that the Project would result in increased use of the existing on-site dirt parking areas and access drives, which could contribute to PM10 emissions. Also see Section 4.3.a, above.

Mitigation Measures

AQ-1: All active portions of the construction site shall be watered to prevent excessive amounts of dust.

AQ-2: All on-site parking areas and driveways, not including overflow and maintenance parking areas, shall be paved as soon as feasible or watered periodically or otherwise stabilized until paved. The unpaved overflow and maintenance parking areas shall be stabilized to the satisfaction of Mono County.

AQ-3: On-site vehicles shall be limited to a maximum speed of 15 miles per hour until the on-site parking areas and driveways are paved.

AQ-4: All construction equipment shall be equipped with required exhaust systems and mufflers.

AQ-5: All necessary permits shall be obtained from Great Basin Unified Air Pollution Control District prior to commencement of construction activities.

AQ-6: The Project shall provide bus parking and adequate turn-around space.

Also see Section 4.4.b, below. This impact would be ***less than significant with mitigation incorporated.***

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

As stated above, Mono County has a non-attainment status for ozone (State standards only); however, local sources are not considered to have a considerable impact on ambient levels of ozone due to the climactic patterns of the eastern slopes of the Sierra Nevada Mountains; thus, the Project would not result in a cumulatively considerable net increase of ozone. Mono County is also designated non-attainment for the PM10 State standard. Please see Sections 4.3.a and 4.3.b., above. Therefore, this impact would be ***less than significant with mitigation incorporated.***

d. Expose sensitive receptors to substantial pollutant concentrations?

The Project would not create substantial pollutant concentrations; therefore, the Project would have ***no impact*** in this category***.***

e. Create objectionable odors affecting a substantial number of people?

The Project is not anticipated to create any objectionable odors and there is no substantial population in the surrounding area. Thus, the Project would have ***no impact*** regarding objectionable odors affecting a substantial number of people***.***

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or indirectly through habitat modifications on any species identified as candidate, sensitive or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			✓	

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?		✓		
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?			✓	

The Project site is primarily surrounded on all sides by undeveloped areas characterized by basin sagebrush vegetation. A substantial portion of the Project site is disturbed, consisting of dirt driveways and parking areas. While much of the area is currently developed as a regional park, there are several locations where stands of basin sagebrush occur.

No potential jurisdictional waters of the U.S., including wetlands regulated by the U.S. Army Corps of Engineers and the Regional Water Quality Control Board (RWQCB) or jurisdictional streambed of the California Department of Fish and Game (CDFG), were identified on the Project site.

A biological resources report was prepared by LSA Associates, Inc. for the Project site, which is attached to this Initial Study/Mitigated Negative Declaration (Appendix A). LSA conducted a field survey in addition to a literature and database review utilizing CDFG and California Native Plan Society records to prepare their report. Supplemental reports were prepared regarding sage-grouse, described below.

a. Have a substantial adverse effect, either directly or indirectly through habitat modifications on any species identified as candidate, sensitive or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?

The USFWS and CDFG may list species as threatened or endangered under the Federal and State Endangered Species Acts. The USFWS can designate critical habitat that identifies specific areas, either occupied or unoccupied, that are essential to the conservation of a listed species. Critical habitat areas may require special management considerations or protections.

During the bird breeding season, typically April 1 through August 31, trees, shrubs, and other vegetation may provide nest sites for migratory birds. Most birds and their active nests are protected from "take" (meaning destruction, pursuit, possession, etc) under the Migratory Bird Treaty Act (MBTA) and/or Sections 3503-3801 of the California Fish and Game Code. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young, may constitute violations of one or both of these laws.

One special status animal species, the Greater Sage-Grouse (Centrocercus urophasianus), may use the basin sagebrush vegetation on the Project site for foraging. The Greater Sage-Grouse is a CDFG Species of Special Concern and the USFWS has ruled that the sage-grouse warrants listing as a federally threatened or endangered species. Site surveys were conducted by qualified biologists who performed focused analyses regarding sage grouse (please see Appendix A). No sage-grouse were observed during site surveys, and use of sage-grouse is expected to be minimal due to the small amount of basin sagebrush vegetation, the disturbed nature of the vegetation, and the level of human activity on the site[12]. In addition, the Mono County Master Environmental Assessment does not show any sage grouse leks on or immediately adjacent to the Project site (Figures 28 and 33J). However, Mitigation Measure BIO-1 has been included to ensure that impacts to sage-grouse are less than significant.

USFWS, CDFG, local agencies, and special interest groups, such as the California Native Plant Society (CNPS), maintain lists of species they consider to be in need of monitoring. Legal protection for these special interest species varies widely.

The Project site contains suitable vegetation and soils to support one special-interest plant species, Long-Valley milkvetch (Astragalus johannis-howellii). The Long-Valley milkvetch considered by CPNS as rare, threatened, or endangered in California and elsewhere. However, no milkvetch were observed on the site during biologist surveys conducted by LSA Associates, Inc. Substantial impacts to this species as a result of project construction

[12] LSA Associates, Inc. General Biological Resources Report for the Whitmore Park Track and Sports Complex Project (September 18, 2009).

are not anticipated due to the small amount of marginally suitable habitat within the Project limits[13].

Indirect impacts to the surrounding area may result from the Project; these include increased dust, noise, lighting, traffic, and storm water runoff. These indirect impacts are analyzed in other sections of this Initial Study/Mitigated Negative Declaration, and would not result significant impacts with the incorporation of mitigation measures. Also, due to the size, location, and generally disturbed nature of the Project site, any potential indirect impacts are not expected to substantially affect any species. Also see Section 4.4.d, below.

Mitigation Measure

BIO-1: Vegetation clearing should be done between September 1 and March 30, outside the Greater Sage-Grouse nesting season. If vegetation must be cleared between April 1 and August 31, the Greater Sage-Grouse nesting season, then a nesting Greater Sage-Grouse survey should be conducted by a qualified biologist no more than one week prior to clearing. If nesting Greater Sage-Grouse are found, then no clearing should be done within 300 feet of any active nest.

This impact would be ***less than significant with mitigation incorporated.***

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The Project site does not contain any riparian habitat or other sensitive natural community identified by CDFG or USFWS. Although the site is generally disturbed, some stands of native sagebrush scrub would be removed for the Project, which the Greater Sage-Grouse may use for foraging. However, the use of sage-grouse is expected to be minimal due to the small amount of basin sagebrush vegetation, the disturbed nature of the vegetation, and the level of human activity on the site[14] (see Section 4.4.a, above). Also, areas disturbed during construction would be revegetated with native species or would have other permanent erosion control installed. Irrigation systems would be provided to ensure the establishment of revegetation. Therefore, the Project would have a ***less than significant impact*** in this area.

[13] LSA Associates, Inc. General Biological Resources Report for the Whitmore Park Track and Sports Complex Project (September 18, 2009).
[14] LSA Associates, Inc. General Biological Resources Report for the Whitmore Park Track and Sports Complex Project (September 18, 2009).

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc) through direct removal, filling, hydrological interruption, or other means?

No Impact. No federally protected wetlands as defined by Section 404 of the Clean Water Act are within the Project site.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Migration corridors may include areas of unobstructed movement of deer, riparian corridors providing cover for foraging birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds. The Project site is northeast of a deer migration corridor[15].

However, due to the size and generally disturbed nature of the Project site, current use of the area as a regional park, and availability of large amounts of habitat for wildlife in the vicinity of the site, the Project would not substantially limit wildlife movement in the area. In addition, chain link and barbed wire fences currently surround the on-site facilities, and an existing barbed wire fence would be relocated around the track as necessary. Therefore, the Project would have a ***less than significant impact*** on the movement of species, migratory corridors, and use of native wildlife nursery sites.

e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?

The Project site is within the Scenic Combining District and State Scenic Highway (S-C district) that includes standards to protect existing trees and native ground cover. Also, animal and plant policies of the Mono County General Plan Conservation/Open Space Element would apply. A substantial portion of the Project site is already disturbed, and it is not anticipated that any trees will be removed with the Project. Also see Sections 4.4.a through d, above. This impact would be ***less than significant with mitigation incorporated***.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?

There are neither Habitat Conservation Plans nor Natural Community Conservation Plans in place within the Project site; therefore, this impact would be ***less than significant***.

[15] Mono County, Master Environmental Assessment, Figure 32J (2001).

4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in 14 California Code of Regulations Section 15064.5?		✓		
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in 14 California Code of Regulations 15064.5?		✓		
c. Directly or indirectly destroy a unique paleontological resource or unique geologic feature?		✓		
d. Disturb human remains including those interred outside of formal cemeteries?		✓		

The National Historic Preservation Act of 1966 (NHPA) requires federal agencies consider the preservation of cultural resources in their decisions and activities. Cultural resources consist of historic-era and prehistoric archaeological sites, dwellings, and structures that may be significant for their data potential, architectural merit, or association with important persons or themes. Engineered works may also be significant for their design or workmanship. Paleontological resources consist of fossils, including the remains or traces of prehistoric animal or plant life. Fossils are typically associated with geological formations that are contemporaneous with the preserved animal or plant remains.

a. Cause a substantial adverse change in the significance of a historical resource as defined in 14 California Code of Regulations Section 15064.5?

Historical resources consist of cultural resources listed on the California Register of Historical Resources (CRHR) and resources determined to be eligible for listing on the CRHR by the CEQA lead agency based upon substantial evidence (14 California Code of Regulations Section 15064.5). A substantial adverse change occurs when the significance of the resource is damaged by alteration of the resource or its setting in a manner that impairs the significance or integrity of the resource.

A Phase 1 archeological survey was conducted for the Project site pursuant to CEQA (see Appendix B). This assessment included a records search and field survey of the Project area.

Data from the Eastern Information Center (EIC) indicated that there are no previously recorded cultural resources within the Project area. There is one archaeological site within the ¼ mile radius search for the study area, which is a historic trash scatter located approximately 1,000 feet northwest of the Project site. Therefore, development of the Project would not disturb any known cultural resources. In addition, it is not likely that unrecorded cultural resources will be disturbed due to prior site disturbances. Nonetheless, as with any project involving ground disturbance, there remains a possibility that previously unknown cultural resources may be discovered during project construction; the following mitigation measures would reduce any potential impacts to a less than significant level.

Mitigation Measures

CULT-1: If cultural resources are identified during ground disturbance associated with the Project, ground disturbing activities near the find shall cease, and an archaeological monitoring program should be implemented. The monitoring program shall be managed by an archaeologist who meets the *Secretary of the Interior's Professional Qualification Standards*. The archaeological monitoring program shall include provisions for an archaeological monitor; assessing the significance of archaeological finds; consideration of avoidance and minimization of impacts to significant archaeological resources (in consultation with the Town and Mono County); mitigation measures including archaeological excavation, laboratory analysis, reporting, and curation; and consultation with Indian Tribes if resource is prehistoric in nature.

CULT-2: If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the fin immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify the Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection with in 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Therefore, this impact would be ***less than significant with mitigation incorporated.***

b. Cause a substantial adverse change in the significance of an archaeological resource as defined in 14 California Code of Regulations 15064.5?

Less than Significant Impact with Mitigation Incorporated. See Section 4.5.a, above.

c. Directly or indirectly destroy a unique paleontological resource or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated. See Section 4.5.a, above.

d. Disturb human remains including those interred outside of formal cemeteries?

Less than Significant Impact with Mitigation Incorporated. See Section 4.5.a, above.

4.6 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) strong seismic ground shaking? iii) seismic-related ground failure, including liquefaction? iv) landslides?		✓		
b. Result in substantial soil erosion or loss of topsoil?		✓		
c. Be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
d. Be located on an expansive soil as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?		✓		
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of waste water?			✓	

Mono County is situated on the eastern flank of the Sierra Nevada mountain range along a system of normal faults that produced the Owens Valley. The Long Valley Caldera spans an area of approximately 10 by 20 miles, and is among the largest volcanoes in the continental United States. Mono County is located at a stress point where the earth's crustal plates are exerting opposite pressures against each other, which creates earthquakes and volcanic activity triggering earth shaking. Low and moderate earthquakes are occasionally felt by local residents.

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) strong seismic ground shaking?

iii) seismic-related ground failure, including liquefaction?

iv) landslides?

Almost all of Mono County is in an area where intense ground shaking is possible. This area has been designated as the zone of greatest hazard defined in the Uniform Building Code (Seismic Zone 4), and therefore, construction must comply with stringent engineering and building requirements[16].

A soils and geotechnical report was prepared for the Project by Sierra Geotechnical Services, Inc ("report"). The report found the Project site to be within the Hilton Creek Fault Zone which is an Alquist-Priolo Hazard Zone. Therefore, the potential for shallow ground rupture should be considered very high. However, the potential for liquefaction to occur is considered low given the very dense nature of bearing soils present on site[17]. In addition, the report identifies that evidence of past soil failures or landslides was not encountered at the site.

Only one structure is proposed as part of the Project, the concessions building. The concessions building would be approximately 2,580 square feet, and consequently could not support a high human occupancy rate. The small size of this structure would minimize potential substantial adverse effects to people and structures as a result of earthquakes. In addition, the Mono County General Plan and Mammoth/June Airport Land Use Plan (ALUP) prohibit incompatible uses surrounding the airport, including uses that would result in a high concentration if people over certain durations (also see Section 4.10, Land Use and Planning).

[16] Mono County, General Plan, Safety Element (1993).
[17] Sierra Geotechnical Services, Inc, Recommendations for Structural Section and Paving (2007).

Mitigation Measures

GEO-1: A building permit shall be obtained for the concessions building to ensure that all applicable Uniform Building Code standards and requirements of the Alquist-Priolo Earthquake Fault Zoning Act are met.

GEO-2: All recommendations of the Sierra Geotechnical Services, Inc Recommendations for Structural Section and Paving (2007) including but not limited to foundation preparation and design, concrete slab-on-grade, preliminary pavement recommendations, and earthwork and grading specifications, shall be implemented. This shall be reviewed prior to the issuance of building and grading permits.

This impact would be ***less than significant with mitigation incorporated.***

b. Result in substantial soil erosion or loss of topsoil?

The Project site is generally flat and ground disturbance would be minimized to the extent feasible. Soil cut and fill would occur to construct a level track and field facility. Since a substantial portion of the site is disturbed, construction of the Project could improve some aspects of soil erosion and loss of topsoil by paving existing dirt parking areas and installing permanent landscaping. Also, a native hydroseed mix or other permanent erosion control would be applied to all new areas disturbed by Project construction. Air quality mitigation measures have also been incorporated to minimize dust and soil erosion (see Section 4.3).

Also see Section 4.3, Air Quality and Section 4.9, Hydrology and Water Quality. This impact would be ***less than significant with mitigation incorporated.***

c. Be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact with Mitigation Incorporated. See Section 4.6.a, above.

d. Be located on an expansive soil as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

Less than Significant Impact with Mitigation Incorporated. See Section 4.6.a, above.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of waste water?

The Project includes installation of a septic tank, as well as relocating the leach field and sewer disposal system per Mono County Health Department standards. The existing leach field and septic tank are adjacent to the existing bathroom building. Percolation testing completed by Sierra Geotechnical Services found that the percolation rate of soil for the Project exceeds five min/inch. Therefore, based on past experience with Mono County Environmental Health Department, the leach trench will require two feet of plaster or concrete sand placed at the bottom of the trench[18].

The new septic tank and system would need to be sized based on engineered flow calculations and designed to handle the largest events on-site[19]. Mono County Environmental Health requires new development in areas where sewers are not available to submit a soils suitability report, supporting the installation of individual sewage disposal systems. These reports are typically submitted with an application for a septic system permit. These permits may be phased based on the phased development of the Project. This impact would be ***less than significant.***

4.7 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.			✓	

Greenhouse gasses (GHGs) consist of gases that increase heat trapped by the earth's atmosphere that is not radiated back out into space. For municipalities, by far the largest single-source (by mass) of GHGs consists of carbon dioxide (CO2) emissions. Municipal sources of CO2 emissions include energy production; this energy is consumed by all developed land-use types, vehicles used for personal travel and transportation of goods, and construction-related emissions caused by heavy equipment.

[18] Traid/Holmes Associates, Preliminary Sewage Disposal System Design for High Sierra Striders Track Project, September 20, 2010.
[19] Louis Molina, Mono County Environmental Health.

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Sustainable measures are incorporated into the Project to reduce its carbon footprint and direct and indirect contributions to greenhouse gas emissions. These include using recycled tires for both the polyurethane track surface and synthetic infield, installing a synthetic infield rather than natural grass (reducing water usage), and evaluating the feasibility of using of solar energy to provide power for the concession building during the building permit process. The concessions building would be subject to current building code regulations, which would include the State adopted green building code. The Project also includes installation of permanent landscaping that would absorb CO2.

Runners who would use the Project currently travel from surrounding residential areas, such as Mammoth Lakes, to Benton Crossing Road or farther to train because of the heavy snowfall in Mammoth Lakes and lack of existing facilities. The High Sierra Striders would encourage and assist in the coordination of carpools for the High Sierra Striders use of the facility. Local running groups and other users of the Project would also typically carpool to the site, decreasing potential greenhouse gas emissions. In addition, bus parking would be provided as required by Mitigation Measures AQ-6 and LUP-3.

Although, the Project would contribute to greenhouse gas emissions directly during construction and indirectly through energy usage and vehicle travel to the site, this impact would be less than significant due to the scale of the Project (see Section 4.16, Transportation and Traffic). The greenhouse gas emissions resulting from the Project would be minimal, particularly in comparison to potential regional impacts. Air quality mitigation measures have been incorporated to minimize air quality impacts; some of these correlate to greenhouse gases (see Section 4.3). Therefore, this impact would be ***less than significant.***

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The California Air Resources Board (CARB) approved a Scoping Plan in 2008 that outlines the actions to reduce California's greenhouse gas emissions. CARB adopted a number of "early action" measures and is working on other measures to reduce greenhouse gas emissions to 1990 levels by 2020[20]. The Project would not conflict with the CARB Scoping Plan (also see 4.7.a, above). Mono County has not adopted any greenhouse gas plan, policy, or regulation. Therefore, this impact would be ***less than significant.***

[20] California Air Resources Board, www.arb.ca.gov/cc/cc.htm.

4.8 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5, and as a result, would it create a significant hazard to the public or the environment?			✓	
e. For a project located within an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?		✓		
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?		✓		
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?		✓		

A hazardous material is defined by the California Department of Toxic Substances Control as a material that poses a significant present or potential hazard to human health or safety if the substance is released into the environment (26 California Code of Regulations Section 25501). Hazardous materials and hazardous wastes are classified to determine if the substances are toxic, ignitable, corrosive, or reactive (22 California Code of Regulations Chapter 11, Article 3). Common hazardous materials include petroleum products, pesticides, volatile organic compounds, and certain metals. In addition, radioactive and explosive materials are considered hazardous.

Response to questions a. through d.:

The Project does not include any specific activities that would require the use of hazardous materials that would lead to public or environmental hazards, release into the environment via accidents, proximity to schools, or construction on hazardous materials sites. The Project site is not on the federal Comprehensive Environmental Response, Compensation, Liability Information System Database (CERCLA). Thus, impacts in these categories would be ***less than significant.***

e. For a project located within an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The Project site is within the Mammoth/June Airport Land Use Plan (ALUP) area (i.e. Mammoth Yosemite Airport). The eastern end of the Mammoth Yosemite Airport runway is approximately ½ mile from the Project site. The Project does not include any residential uses; therefore, no people would reside in the Project area. However, there would be people working at the Project site to perform maintenance activities, operate the concessions building, and provide other services for track and field events (e.g. referees, clean up crew, etc). The Mono County General Plan and the ALUP prohibit uses that would result in a high concentration if people around the airport, which would reduce the potential safety hazard for people working in the Project area (also see Section 4.10, Land Use and Planning).

Mitigation Measure

HAZ-1: The Project shall be approved by Mono County to ensure all Airport Land Use Plan regulations are met. This may also include consideration and approval by the Airport Land Use Commission.

Therefore, this impact would be ***less than significant with mitigation incorporated***.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant with Mitigation Incorporated. Please see Section 4.8.e, above.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Mono County Emergency Operations Plan (EOP) describes how Mono County will prepare for and respond to emergencies threatening lives and property in Mono County. The EOP uses California's flexible and multi-level Standardized Emergency Management System (SEMS), and complies with the federal National Incident Management System (NIMS)[21]. The Project will not impair implementation or physically interfere with the EOP because no circulation changes are being proposed which conflict with the procedures set forth in the EOP. Also, the Project would allow emergency vehicle access along the paths and trail system where appropriate and feasible through the use of removable bollards. If the Project was to operate year round, snow removal operations may be required to keep the emergency access trails clear of snow. Therefore, this impact would be ***less than significant.***

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The Eastern Sierra wildland fire season normally lasts from mid-June through early-October, although drought years or unusual weather may modify that range. Extreme conditions occur during periods of low humidity, low fuel moisture, and high winds. Wildland fires in the vicinity of the Project site pose a risk to public safety because of the site's proximity to heavily wooded National Forest lands and climatic conditions (e.g. high winds). Therefore, the Project site has been identified as a California Fire Hazard Area[22]. However, the Project does not include any residential uses and includes only one structure, the concessions building, thereby minimizing the risk of exposing people or structure to a significant risk of loss, injury, or death involving wildland fires.

Fire risk is managed by public information strategies such as the Eastern Sierra Region Fire Safe Council (ESRFSC) and the mandates of state law, such as California Public Resources Code Section 4291 which provides fuel break standards and other fire-risk reduction measures. The Project would comply with the Mono County General Plan Safety Element and Fire Safe Ordinance, which contain a number of policies to address fire hazards. These

[21] Mono County, Emergency Operations Plan (2007).
[22] Municipal Service Review and Sphere of Influence Recommendation, Long Valley Fire Protection District, Mono County, California (2009).

measures are enforced locally by the Long Valley Fire Protection District and by Mono County as part of the development review process.

Mitigation Measure

HAZ-2: The Long Valley Fire Protection District shall review and approve the Project plans in coordination with Mono County, such as through the provision of a will-serve letter.

Also see Sections 4.14, Public Services and 4.17, Utilities and Service Systems. This impact would be ***less than significant with mitigation incorporated.***

4.9 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?		✓		
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?		✓		
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		✓		
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?		✓		

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Otherwise substantially degrade water quality?		✓		
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				✓
j. Inundation by seiche, tsunami, or mudflow?			✓	

The Whitmore Regional Park area is located within Long Valley in Mono County. The Long Valley watershed is approximately 380 square miles and includes the upper reaches of the Owens River above Crowley Lake. Streams in the Long Valley watershed generally flow eastward to the Owens River. Major creeks include Mammoth, Hot, and Convict creeks. The low point in the watershed is Crowley Lake, which was constructed in 1941. The Project site is located on the watershed divide between the Convict Creek and Hot Creek subbasins[23]. Convict Creek is approximately ¼ mile from Benton Crossing Road, off of which the Project site is accessed. There are no bodies of water on the Project site.

Surface water runoff generally flows west to east based on the topography of the Project site. There is an existing well and pump house that provide water to the existing bathrooms, animal shelter, and irrigation on-site. Surface runoff flows into the existing swale along Benton Crossing Road. Currently, there is an issue with the ponding of water at existing entrance to the Project site.

Erosion and water quality impacts typically occur when development projects require excavation that alters surface permeability of the landscape or drainage channels, or reduces natural ground cover that holds soil in place. Flood risk may be increased when construction projects reduce the floodwater capacity of surface water channels or decrease the permeability of the landscape through the construction of impermeable surfaces. These actions may increase the incidence of surface runoff that is channeled through storm

[23] Town of Mammoth Lakes and United Airlines, Final Environmental Assessment (June 2010).

drainage systems. Ground water recharge may also be affected when projects reduce the permeability of the surface landscape thus reducing water flow into aquifers or when projects alter drainage patterns that contribute to recharge.

a. Violate any water quality standard or waste discharge requirements?

As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States[24]. The NPDES permit program is administered by the California Regional Water Quality Control Boards (RWQCB). The Project site is located within the jurisdiction of the Lahontan RWCQB. Mono County requires the development of wells and waste disposal systems to comply with the Lahontan RWQCB's criteria, including the Water Quality Control Plan. The Project would be required to comply with Lahontan RWQCB's requirements and permit processes.

Also, the Mono County General Plan (Conservation/Open Space Element, Public Health and Safety policies) and the Mono County Grading Ordinance (Mono County Code Chapter 13.08) contain erosion control policies that would be applicable to the Project.

Short-Term Construction: Potential adverse water quality impacts arising from erosion, siltation, and sedimentation would be the greatest during construction periods. As required by Mitigation Measure HWQ-4, a Storm Water Pollution Prevention Plan (SWPPP) shall be prepared with the grading plans to fulfill regulatory requirements. The SWPPP would include Best Management Practices (BMPs) to protect water quality. Also, Mitigation Measure HWQ-5 requires that permanent erosion control measures shall be placed on all graded slopes, and no graded areas shall be left unstabilized between October 15th and April 15th. With the incorporation of mitigation measures the short-term impacts to water quality would be less than significant.

Long-Term Operations: After completion of the Project, including installation of landscaping, hydroseeding and permanent erosion control, and pavement of parking and driveway areas, erosion and sedimentation would decrease. However, the increased area of impervious surfaces would increase runoff. The drainage facilities installed for the Project would meet Lahontan RWQCB requirements, and with the incorporation of mitigation measures the long-term impacts to water quality would be less than significant. In addition, when the parking areas are paved, an oil/water separator would be installed. Please see Section 4.6.e regarding waste water disposal.

Mitigation Measures

HWQ-1: All wastewater treatment and disposal systems shall be designed, constructed, and maintained in accordance with requirements established by the Lahontan Regional Water

[24] www.epa.gov/oecaerth/monitoring/programs/cwa/npdes.html

Quality Control Board and Mono County Health Department. Waste discharge permits shall be obtained prior to the installation of wastewater facilities.

HWQ-2: The Project shall install adequately designed drainage retention facilities in accordance with the Lahontan Regional Water Quality Control Board requirements. A drainage and erosion control plan shall be submitted to the Lahontan Regional Water Quality Control Board and Mono County Public Works Department prior to grading activities.

HWQ-3: All exposed soil areas shall be stabilized and/or reseeded according to an approved landscape/revegetation/erosion control plan. All stockpiles of unsuitable soil materials shall be removed and disposed of at an approved site(s) designated by Mono County.

HWQ-4: A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared with the grading plans to fulfill regulatory requirements.

HWQ-5: Permanent erosion control measures shall be placed on all graded slopes. No graded areas shall be left unstabilized between October 15th and April 15th.

Also see Sections 4.3, 4.6.b, and 4.6.e. Thus, these impacts would be ***less than significant with mitigation incorporated***.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Long Valley Basin is a 120 square mile basin situated in the Long Valley Caldera, and serves as the headwaters of the Owens River system. Rainfall averages 20 inches per year with most of the precipitation occurring in the Sierra Nevada range in the form of snow[25]. An existing well would serve the Project's water needs, which would include bathrooms, showers, concessions services, and irrigation. The proposed synthetic infield, which would be approximately 97,000 square feet, has a 40% porous backing, so the new field would not be impermeable. Although increased impervious surfaces through the paving of the driveway and parking areas are anticipated to reduce groundwater recharge, due to the scale of the Project, the impact to groundwater supplies and groundwater recharge would not be substantial. In addition, a well test was conducted over an eight hour period that showed a quick recovery or recharge rate of the groundwater table; therefore, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge (see

[25] Mono County, Master Environmental Assessment (2001).

Appendix E, Water Supply and Capacity Evaluation). These impacts would be ***less than significant.***

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

The Project site is relatively flat, without any stream or river course. The Project would include drainage facilities and improvements that would adequately accommodate and enhance on-site drainage. Site disturbance would be minimized to that necessary for construction of the Project. With the incorporation of mitigation measures identified in Sections 4.3, Air Quality and 4.9.a, above, the Project would not substantially alter the existing drainage pattern of the site or area. Thus, these impacts would be ***less than significant with mitigation incorporated***.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than Significant Impact with Mitigation Incorporated. Please see Section 4.9.c, above.

e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

The Project includes installation of drainage facilities that would be required to meet the Lahontan Regional Water Quality Control Board regulations (see Mitigation Measure HWQ-2). Also see Section 4.9.a, above; these impacts would be ***less than significant with mitigation incorporated***.

f. Otherwise substantially degrade water quality?

Areas with shallow groundwater can be difficult to drain and may allow spilled materials to contaminate the groundwater aquifer. The Project site is adjacent to zones of shallow ground water as identified in the Mono County Master Environmental Assessment (Figure 21J). The Project would include installation of adequate drainage facilities and would enhance existing drainage conditions on-site. Also see Sections 4.9.a through e and Appendix E, Water System Supply and Capacity Evaluation. Therefore, this impact would be ***less than significant with mitigation incorporated***.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project does not include any housing.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The Project site is not within a 100-year flood hazard area as defined by the Federal Emergency Management Agency (FEMA).

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The Mono County Master Environmental Assessment identifies the Project site outside of the 100-year flood zone and dam failure inundation zone (Figure 38J). Therefore, there would be ***no impact*** in this category.

j. Inundation by seiche, tsunami, or mudflow?

The Project site is relatively distant from the ocean capable of creating a tsunami. Crowley Lake is approximately two and a half miles from the Project site; therefore, the potential for seiches are considered very low[26]. Also evidence of past soil failures, or landslides, were not encountered on the site, so inundation by mudflow is not anticipated. Thus, this impact would be ***less than significant***.

4.10 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance),		✓		

[26] Sierra Geotechnical Services, Inc, Recommendations for Structural Section and Paving (2007).

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
adopted for the purpose of avoiding or mitigating an environmental effect?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?			✓	

a. Physically divide an established community?

No Impact. The Project site is not within an urbanized area and there are no residential areas in immediate vicinity of the site; therefore, it would not divide any established community.

b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance), adopted for the purpose of avoiding or mitigating an environmental effect?

The Project site is designated as Open Space (OS) by the Mono County General Plan and Industrial/Public Agency (PA) by the Mammoth/June Lake Airport Land Use Plan (ALUP).

The Mono County Master Environmental Assessment (MEA) contains all of the background information for the Mono County General Plan and serves as a database for the development of General Plan policies. The Project is required to conform to the policies and standards contained in the General Plan including setbacks, parking, lot coverage, outdoor lighting, signs, and Scenic Combining District and State Scenic Highway (S-C district).

The ALUP includes specific requirements based on the environmental analysis for the ALUP (Environmental Impact Report and Environmental Assessment for Mammoth/June Airport Land Use Plan[27]). Mitigation Measure HAZ-1, Section 4.8.e, requires the Project to be approved by Mono County to ensure all ALUP regulations are met, which may include consideration and approval by the Airport Land Use Commission.

[27] State Clearinghouse No. 86060901.

Land Use

Although the ALUP is in the process of being updated, based on the current ALUP, it appears that the Project site may be within the overflight zone (i.e. primary traffic pattern zone)[28]. Applicable policies of the overflight zone include:

- Restricting the development of incompatible uses such as:
  - any use that would direct a steady or flashing light toward an aircraft engaged in take-off or landing,
  - any use that would cause sunlight to be reflected toward an aircraft,
  - any use that would generate large amounts of smoke or steam,
  - any use that would generate electrical interference, and
  - any use that would attract large concentrations of birds.
- Restricting uses within the primary traffic pattern zone, which on a regular basis, would result in concentrations of people exceeding 25 persons per acre (e.g. shopping centers, restaurants, schools, hospitals, stadiums/arenas, and office complexes).
- No structures over 35 feet are permitted in the ALUC Planning Boundary.
- Non-residential development may be permitted within the 65 dB CNEL contour if structures are soundproofed to limit interior noise levels to 45 dB CNEL.
- The maximum noise exposure considered acceptable for non-residential land uses without special sound reduction construction is 60 dB CNEL.

The 23.75-acre site, including the existing ball fields and animal shelter, would contain approximately 593 people at 25 people per acre, which is a maximum intensity of use pursuant to the ALUP. The Project's terraced seating areas are anticipated to accommodate approximately 357 people, which would be 236 people below the maximum (see Table 4.10-1, note A). It is not anticipated that there would be more than 236 athletes or other users of the site facilities that would be on-site at the same time the Project's seating areas are filled to capacity.

Currently, the largest event held at the Whitmore Regional Park is the High Sierra Fall Century. The Fall Century is not associated with or dependent on construction of the track facilities. Special events at the Whitmore Regional Park are currently regulated by the Town of Mammoth Lakes and/or Mono County's special event permit processes. These permitting processes ensure that adequate facilities, traffic management, and staging areas are provided for the event. Through the special event permit processes, simultaneous large events would not be scheduled so as to not conflict with the site's capacity.

[28] Mammoth/June Lake Airport Land Use Plan, Figure 12 (1986).

The Project's only structure is the concessions building, which would be approximately 20 feet in height, which would be below the 35 foot maximum height.

Therefore, the Project would not constitute an incompatible use with the incorporation of mitigation measures, such as HAZ-1 and Aesthetic mitigation measures in Section 4.1. Please see Section 4.12 for the Noise analysis.

Parking

The Project's parking is subject to the Mono County General Plan parking requirements (Land Use Element, Chapter 06.100, Parking, Joint-use). Adequate parking is required for both the Project and the existing uses (animal shelter and ball fields) unless there is no conflict between the times the different uses operate. The animal shelter has an existing paved parking area in front of the building off Benton Crossing Road. This parking area provides adequate parking for the animal shelter, usually not more than five cars at one time[29]. The animal shelter operates Tuesdays through Saturdays from 10:30a.m. to 5p.m. (closed 12-1p.m.)[30]. Since the animal shelter parking area is separated from the proposed Project driveways and parking areas and provides adequate parking, the Project would not be required to provide additional parking spaces for the animal shelter.

The three existing ball fields are most frequently used in the evenings, but are also used during the day. The Project is anticipated to be used during the day and evenings throughout the week. Therefore, there may be certain times when the ball fields and the Project operate concurrently; the parking analysis looks at this "worst-case" scenario.

It is not standard practice to provide parking for peak uses of a site; however, the Project includes overflow parking in disturbed areas on-site to accommodate additional parking during large special events. An area northwest of the animal shelter is identified as overflow parking, and an existing dirt area in the northeast portion of the site would be used for maintenance parking. These areas could accommodate approximately 45 additional vehicles.

[29] Rebeka Bone, Whitmore Animal Shelter Attendant, via phone, October 5, 2010.
[30] www.monocounty.ca.gov/departments/animal/animalcontrol.html; winter hours are 10:30a.m. to 4:30p.m. (closed 12-1p.m.).

Table 4.10-1: Parking

Use	Parking Generation Rate	Parking Required	Parking Proposed
Project	Public assembly facilities: 1 space for each 4 seats	89 [A]	120 paved parking spaces; approximately 45 unpaved overflow parking spaces (165 total parking spaces)
Ball Fields (3)	20 cars and 2 buses per field [B]	60 spaces and 6 bus parking spaces	
	Total Required	149 spaces and 6 bus parking spaces	

A. There is approximately 4,280 square feet of terraced seating areas that are four feet deep. Assuming seats are three feet wide, each "seat" is 12 square feet; therefore, 4,280 s.f. / 12 s.f. = 357 "seats" or people. For public assembly facilities, 357 "seats" / 4 = 89.25 parking spaces.

B. Town of Mammoth Lakes, Dennis Rottner, Park Superintendent identification of maximum ball field demand.

As shown in Table 4.10-1, the paved and overflow parking areas would provide adequate parking for both the Project and the existing ball fields. However, the parking areas may need to be reconfigured to accommodate bus parking. Mitigation Measure LUP-3 is included to ensure that adequate bus parking and turnaround space are provided while still providing the required parking spaces for the Project and the ball fields (also see Mitigation Measure AQ-6).

The Fall Century is currently the largest special event on the Project site. This event utilizes existing disturbed areas for parking, and some of these disturbed areas would be developed with the Project. However, most of these disturbed areas would be developed with paved parking for the Project; thereby not substantially impacting special event parking. Also, some of the existing disturbed areas would still remain as overflow parking that could continue to be used for special event parking and staging as described above. In addition, parking for large special events could potentially use the paved parking lot at the nearby Whitmore Pool, which is currently striped for 31 cars.

Special event permits are reviewed and approved annually by the Town of Mammoth Lakes and/or Mono County for special events, such as the Fall Century. Special event permits include an analysis of parking, staging, traffic management, and other aspects. These permits would continue to be required with development of the Project, and include provisions to avoid simultaneous scheduling of large special events that would result in inadequate parking.

The paving of parking would be phased with the Project; it is anticipated that a portion of the parking and driveway area be paved in Phase two and the remaining area paved in Phase three. During the interim period after the track and field is constructed (Phase one) and before the parking area is paved (phases two and three), parking would occur in the existing disturbed areas on-site, as is the current parking situation. Due to the large amount of disturbed area that would remain accessible in Phase one, the parking would be adequate during this interim period.

Mitigation Measures

LUP-1: A use permit for the Project shall be approved by the Mono County Planning Commission to ensure Project consistency with the Mono County General Plan.

LUP-2: Special event permits shall be required for special events on the Project site. Special event permits shall regulate the number of people and parking and staging areas on the Project site, as well as other issues, such as noise. No parking or staging shall be permitted outside of designated areas (e.g. undisturbed areas).

LUP-3: The parking areas shall be reconfigured and/or redesigned as necessary to provide adequate bus parking and turnaround space, while still providing the required vehicle parking spaces for the Project and the existing ball fields.

Also see Sections 4.1, Aesthetics, 4.8.e, Hazards and Hazardous Materials, and 4.12, Noise. This impact would be ***less than significant with mitigation incorporated.***

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Also see Section 4.4.f, Biological Resources. There are neither Habitat Conservation Plans nor Natural Community Conservation Plans in place within the Project site; therefore, this impact would be ***less than significant***.

4.11 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✓

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Development of new mineral resource extraction is not contemplated with the Project. In addition, no significant mineral deposits are present, nor is there the likelihood of their presence within the Project site[31]. Thus, the Project would not result in the depletion of a mineral resource of statewide or local significance.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Implementation of the Project would not result in the loss of availability of a locally-important mineral resource recovery site.

4.12 Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	

[31] Mono County, Master Environmental Assessment, Figure 17J (2001).

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		✓		
e. For a project within an airport land use plan or within two miles of an airport where such a plan has not been adopted would the project expose people residing or working in the project area to excessive noise levels?		✓		
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?		✓		

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective, and the physical response to sound complicates the analysis of its impact on people. Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB).

The Project would be subject to the Mono County General Plan Noise Element and the Mammoth/June Airport Land Use Plan (ALUP). The Noise Element identifies that the ALUP should continue to be implemented, as well as Mono County Code Chapter 10.16, *Noise Regulation*. The purpose of *Noise Regulation* is to prohibit unnecessary, excessive, and annoying noises from all sources subject to Mono County's police power.

The most significant noise sources in the Project area are aircraft operations at the Mammoth Yosemite Airport, traffic on U.S. Highway 395 and Benton Crossing Road, and snow removal activities. These activities are regulated by Chapter 10.16, *Noise Regulation*.

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short-term construction related noise impacts would be associated with excavation, grading, during the Project's construction phases. Construction related short-term noise levels would be higher than the existing ambient noise levels in the Project area, but would cease once construction is completed.

Long-term operational noise impacts would be associated with track and field events, such as running competitions and soccer games. Noise may be generated from vehicles at the Project site, or by cheering, amplified announcing, or other spectator noise. Operational noise would be intermittent and of short durations when special events are held. However, these special events would be regulated through special event permits issued by the Town of Mammoth Lakes and/or Mono County, which would address potential noise impacts (see Mitigation Measure LUP-2 and Mono County Code 10.16.100.C). In addition, the Project would not result in noise that would be dissimilar to existing noise levels from the Mammoth Yosemite Airport, existing ball fields, and traffic and snow removal operations on U.S. Highway 395 and Benton Crossing Road.

There are no sensitive noise receptors, such as residential uses, schools, or hospitals adjacent to the Project site, although the animal shelter may be considered a sensitive receptor. The animal shelter would be approximately 400 feet from the track and field facility once constructed. However, the Project would be required to comply with Mono County Code Chapter 10.16, *Noise Regulation*, which limits exterior and interior noise levels during day and night. Also see Mitigation Measure LUP-2. Thus, this impact would be ***less than significant with mitigation incorporated***.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Short-term construction related noise impacts may include the generation of groundborne vibration or noise levels from large construction equipment. Pile driving would not be part of the Project construction activities. The Project would be required to comply with Mono County Code Chapter 10.16, *Noise Regulation*, thus this impact would be ***less than significant.***

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The Project is consistent with the existing recreational facilities at the Whitmore Regional Park, specifically the ball fields. Also, the amount of traffic generated by the Project would not be significant and not result in a substantial increase in ambient noise levels (see Section 4.16, Transportation and Traffic). Therefore, the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels without the Project. Also see Section 4.12.a, above. Thus, this impact would be ***less than significant***.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact with Mitigation Incorporated. See Sections 4.12.a and b, above.

e. For a project within an airport land use plan or within two miles of an airport where such a plan has not been adopted would the project expose people residing or working in the project area to excessive noise levels?

The Project site is within the Mammoth/June Airport Land Use Plan (ALUP) and located approximately ½ mile from the east end of the airport runway. The Project does not include any residential uses; therefore, no people would reside in the Project area. However, there would be people working at the Project site to perform maintenance activities, operate the concessions building, and provide other services for track and field events (e.g. referees, clean up crew, etc). The Mono County General Plan and the ALUP prohibit uses that would result in a high concentration if people around the airport, which would reduce the potential degree of exposure to noise within the Project area (also see Section 4.10, Land Use and Planning).

The ALUP has the following requirements for uses within the overflight zone:

- Non-residential development may be permitted within the 65 dB CNEL contour if structures are soundproofed to limit interior noise levels to 45 dB CNEL.
- The maximum noise exposure considered acceptable for non-residential land uses without special sound reduction construction is 60 dB CNEL.

The Final Environmental Assessment for United Airlines Service (2010) shows the Project site would be well outside of the CNEL 65 (Figure 5.3-10). Therefore, the Project would be consistent with the above ALUP noise requirements. Mitigation Measure HAZ-1 requires the Project to be approved by Mono County to ensure all ALUP regulations are met, including noise requirements, which may also include consideration and approval by the Airport Land Use Commission. This mitigation measure would ensure that the Project would not expose people to working in the Project area to excessive noise levels. This impact would be ***less than significant with mitigation incorporated***.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact with Mitigation Incorporated. Please see Section 4.12.e, above.

4.13 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c. Displace substantial numbers of people, necessitating the construction of housing elsewhere?				✓

Mono County has experienced modest growth in resident population since 1990 with a net change of 3,581 residents between 1990 and 2005[32]. Mammoth Lakes, the only incorporated town in Mono County, accounts for the majority of population growth in the County. Mammoth Lakes' permanent population was estimated at 7,400 in 2008, with 3,140 households and an average household size of 2.44 persons. Mammoth Lakes' economy is dominated by tourism, focused around outdoor recreation such as Mammoth Mountain Ski Area. During peak visitor periods, the Mammoth Lakes' local population can increase by up to five times due to the recreational land uses in the vicinity such as the Mammoth Mountain Ski Area. The closest residential areas to the Project site are Mammoth Lakes and Crowley Lake.

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The Project would serve the existing residents of Mammoth Lakes and Mono County, but is also anticipated to attract more visitors to the area that would likely stay in nearby communities such as Mammoth Lakes while participating in high elevation training. Principally, visitation to and use of the Project would occur in the summer, thereby not increasing visitation during the peak winter season. It is not anticipated that the Project would induce substantial permanent population growth in the area, either directly or indirectly since no housing or expanded infrastructure to support residential development is proposed. Thus, impacts related to population growth would be ***less than significant.***

[32] Town of Mammoth Lakes and United Airlines, Final Environmental Assessment, June 2010.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

There is no existing housing located on the Project site; therefore, ***no impact***.

c. Displace substantial numbers of people, necessitating the construction of housing elsewhere?

There would be no people displaced by the Project; therefore, ***no impact***.

4.14 Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Fire protection?		✓		
b. Police protection?			✓	
c. Schools?			✓	
d. Parks?				✓
e. Other public facilities?		✓		

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

The Long Valley Fire Protection District (LVFPD) provides fire protection and emergency response to the communities in Long Valley (i.e. Sunny Slopes, Aspen Springs, Crowley Lake, McGee Creek, and Long Valley). The LVFPD boundary also includes the Mammoth Yosemite Airport. The Project site is within the boundaries of the LVFPD, which includes approximately 114 square miles. The LVFPD has a main fire station in Crowley Lake and a

second station at Hot Creek Fish Hatchery. District equipment includes four engines/pumpers, one water tender, three rescue vehicles, and two command vehicles[33].

Due to the scale of the Project, which does not include residential development, it is not anticipated that the Project would increase the need for fire services facilities or substantially affect service ratios and response times. Also see Sections 4.8.h and 4.17. This impact would be ***less than significant with mitigation incorporated***.

b. Police protection?

Police protection and law enforcement in Mono County are provided by the Mono County Sheriff's Department (MCSD) and the California Highway Patrol (CHP). The Mammoth Lakes Police Department (MLPD) provides all non-traffic related services for the areas within the Town's incorporated boundary, including the Mammoth Yosemite Airport.

The southern sections of Mono County, including the Project site, are patrolled by Mono County Sheriff's Department Deputies that are stationed out of the Crowley Lake Sub-Station. The Crowley Lake Sub-Station is not manned full time[34]. Due to the nature and anticipated use of the facility, the Project is not anticipated to result in the need for expanded police services that would require new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives[35]. However, during special events, there may be an additional need for police services, which would be addressed through special event permits. Therefore, this impact would be ***less than significant***.

c. Schools?

The Project does not contain any residential uses that would generate new students or demand for school facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives. It is anticipated that nearby schools, such as those within the Mammoth Unified School District, would utilize the Project for track and field teams practice and events, which would be a beneficial impact. This impact would be ***less than significant***.

d. Parks?

No Impact. The Project site is located within the Whitmore Regional Park that includes three ball fields and a pool facility. The Project would expand upon existing facilities as

[33] Municipal Service Review and Sphere of Influence Recommendation, Long Valley Fire Protection District, Mono County, California (2009).
[34] www.monosheriff.org
[35] Mono County Sheriff's Department, verbal correspondence, operator and Lieutenant Weber (September 15, 2010).

envisioned by the Town of Mammoth Lakes Draft Parks and Recreation Master Plan and Mono County Parks Development Plan, and provide additional recreational opportunities in Mono County. This impact would be a beneficial impact.

e. Other public facilities?

Mammoth Hospital in Mammoth Lakes is the closest hospital to the Project site. People suffering from severe illness or injuries are taken to Reno or Los Angeles for treatment. The Project would not substantially affect emergency services.

Currently, the Town of Mammoth Lakes ("Town") operates and maintains the Whitmore recreation facilities with annual funding assistance from Mono County. The Town and Mono County divide the costs of operation, maintenance and repair services, and the payment of rent on the underlying leases from LADWP (the County reimburses the Town for no less than 50% of such costs). Capital improvements to the Whitmore facilities exceeding $5,000 shall be subject to a cost sharing formula agreed to by the Town and Mono County[36].

Since the cost of operation, maintenance and repair services, and rent have been historically shared by the Town and Mono County, it could be anticipated that these costs would continued to be shared with implementation of the Project. However, if Mono County did not agree to share these costs, the Town would solely operate and maintain the Project without funding assistance from Mono County. In this circumstance, the Project could increase the Town's park maintenance and potentially snow removal operations, if the Project operated year round. The Town would continue to maintain all Town recreational facilities to ensure they are kept in a satisfactory working condition for use by the general public. The Project's snow removal level of service would be low, and would have no impact on the Town's existing snow removal service levels. In addition, since the Project site is at a lower elevation, there is less snow accumulation compared to Mammoth Lakes.

Mitigation Measure

PS-1: The Town of Mammoth Lakes shall consider expansion of snow removal operations at the Project, if year round use of the Project is desired. The Project's snow removal level of service shall be established at a level that would have no impact on the Town's existing prioritization list of snow removal operations and levels of service within Mammoth Lakes (Town of Mammoth Lakes Public Works Department Snow Management Policy[37]).

This impact would be ***less than significant with mitigation incorporated***.

[36] Agreement for the Operation of Public Service Facilities in the Whitmore Area between Mono County and Town of Mammoth Lakes (1995).
[37] www.ci.mammoth-lakes.ca.us/documents/Public%20Works/Public%20Works%20Maintenance (Snow Management Policy, Effective Date 1/18/06).

4.15 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		✓		

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Project would expand upon existing facilities as envisioned by the Town of Mammoth Lakes 1990 Park and Recreation Element, Draft Parks and Recreation Master Plan, and Mono County Parks Development Plan. The Project would provide additional recreational opportunities in Mono County within the Mammoth Lakes vicinity. It is anticipated that the Project would increase the overall use of ancillary facilities such as restrooms and parking at the Whitmore Regional Park, which has been identified as the least frequently used of the Town of Mammoth Lakes operated recreation facilities[38]. Also, Mono County General Plan Land Use Element states, "Provide additional regional recreational facilities" and "Study the feasibility of expanding the existing recreational facilities at Whitmore" (page II-61).

The expansion of the existing Whitmore Park is proposed with this Project, which would provide high quality training and sports facilities that are not currently available in the surrounding communities, including Mammoth Lakes and Crowley Lake. The Project site is located at an optimum elevation for elite running conditioning (approximately 7,000 feet)[39]. Also, there is not adequate space for this type of high performance facility at the existing high school football field, which is an existing field with outdoor lighting.

The Project also includes a concessions building and paved parking areas in phases two and three, which would constitute upgrades to the existing on-site facilities. Therefore, the Project would not increase use of existing recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated. This impact would be ***less than significant***.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

[38] Town of Mammoth Lakes, Draft Parks and Recreation Master Plan (2008) (page 109).
[39] Elaine Smith, High Sierra Striders, verbal correspondence.

The Project includes a recreational facility. The potential environmental impacts of this Project are discussed in this Initial Study/Mitigated Negative Declaration. Please refer to mitigation measures throughout this study, which would reduce all potential environmental impacts to less than significant. Therefore, this impact would be ***less than significant with mitigation incorporated***.

4.16 Transportation and Traffic

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			✓	
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			✓	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?		✓		
d. Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersection) or incompatible uses (e.g. farm equipment)?			✓	
e. Result in inadequate emergency access?			✓	
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			✓	

U.S. Highway 395 is the principal route to and through Mono County. It is the primary route suitable for emergency purposes and the principal route to the County's many recreational and tourist attractions. In the area of the Project site U.S. Highway 395 has four travel lanes (two in each direction), a center median, and a left turn pocket onto Benton Crossing Road. Benton Crossing Road is a two lane County highway that provides access to the Project site. Both U.S. Highway 395 and Benton Crossing Road are designated scenic highways.

Transit services in Mono County currently include inter-regional and countywide services provided by Inyo-Mono Transit. The Mammoth Yosemite Airport is approximately ½ mile from the Project site (to the east end of runway). The Town of Mammoth Lakes owns and operates the Mammoth Yosemite Airport. The Mono County Regional Transportation Plan includes policies that promote the development of non-motorized facilities for pedestrians, bicyclists, and cross-country skiers, primarily in community areas to reduce dependence on the automobile and increase the walkability of local communities[40].

Level of service (LOS) is commonly used as a qualitative description of intersection operation and is based on the type of traffic control and delay experienced at the intersection. The LOS is expressed as a ranking of the intensity and duration of delays measured at intersections from A to F with A being the highest or best LOS and F consisting of a high level of congestion and or delay.

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Two separate traffic volume studies were conducted during the summer of 2010 utilizing count stations along Benton Crossing Road (see Appendix D). One was conducted May 20 through 26, 2010, and the other on September 11, 2010 during the High Sierra Fall Century event. The High Sierra Fall Century event is thought to represent the peak traffic impact scenario on Benton Crossing Road and at the intersection of Benton Crossing Road and U.S. Highway 395[41].

Traffic data was collected on September 11, 2010 by two tube counters on Benton Crossing Road. Station 1 was located just off U.S. Highway 395 and Station 2 was located northeast of the Whitmore Pool.

[40] Mono County, Regional Transportation Plan (2008 Update).
[41] Appendix D, Traffic Impact Analysis

The traffic volumes collected on September 11, 2010 area as follows:

Station 1:
- Peak Daily Traffic – 1856 vehicles
- Peak Hour Traffic – 6:30 to 7:30a.m. – 256 vehicles

Station 2:
- Peak Daily Traffic – 881 vehicles
- Peak Hour Traffic – 3:45 to 4:45a.m. – 90 vehicles

Traffic volume data collected during the High Sierra Fall Century event was used to analyze potential impacts of the Project. Although the Fall Century event is considered to be a peak traffic scenario at this time, it is anticipated that the Project will occasionally hold events that will be similar in nature and will therefore produce similar traffic volumes and patterns.

As shown in Appendix D, all driveway and intersection movements are expected to operate at a LOS A with the exception of the southbound/eastbound left onto U.S. Highway 395 from Benton Crossing Road, which is expected to operate at LOS B; these Levels of Service are well within the accepted County and State standards. Although no significant circulation impacts were found, the Traffic Impact Analysis recommends consideration of a one-way looped driveway to optimize traffic flow and minimize potential queuing on Benton Crossing Road. This may also allow for a reconfiguration of the proposed parking that would provide opportunity to add additional parking spots if necessary. Therefore, this impact would be ***less than significant.***

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. See Section 4.16.a, above.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Mitigation Measure HAZ-1 requires the Project to be approved by Mono County to ensure that all of the Mammoth Yosemite Airport Land Use Plan regulations are met so that there would be no impact to air traffic or safety (see Section 4.8.e). Therefore, this impact is ***less than significant with mitigation incorporated***.

d. Substantially increase hazards due to a design feature (such as sharp roadway curves) that are incompatible for planned or foreseeable uses (e.g. farm equipment)?

The Project does not include any hazardous design feature, such as sharp roadway curves, that are incompatible for planned or foreseeable uses. Existing disturbed areas would be utilized to the maximum extent feasible for the parking and driveway areas; no changes to the design of Benton Crossing Road are proposed. Appropriate directional signage may be installed for wayfinding along U.S. Highway 395 as appropriate[42]. Thus, the Project would not substantially increase transportation hazards due to a design feature, and this impact would be ***less than significant***.

e. Result in inadequate emergency access?

The Project will not impair implementation or physically interfere with the Mono County Emergency Operations Plan (EOP) because no circulation changes are being proposed which conflict with the procedures set forth in the EOP. The driveway paving and design improves access and functionality of the internal circulation on the Project site, and would be designed to accommodate emergency vehicles such as large fire trucks. Also, the Project would allow emergency vehicle access along the paths and trail system where appropriate and feasible through the use of removable bollards. If the Project was to operate year round, snow removal operations may be required to keep the emergency access trails clear of snow. Emergency vehicles and responders would also require access to the track and field to assist in the event of a sporting injury, which could be accommodated through signage (i.e. "No Parking – Fire Lane") or other methods[43]. Also see Section 4.8.g, Hazards and Hazardous Materials. Therefore, this impact would be ***less than significant.***

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Mono County Transit Plan delineates policies for future development and operation of transit systems in Mono County[44]. The Project would not affect any alternative transportation facilities or routes. However, Air Quality Mitigation Measure AQ-6 requires bus parking and adequate turn-around space be provided, which could allow for future transit options and incorporation into transit routes if appropriate. Therefore, this impact would be ***less than significant***.

[42] Caltrans, District 9, CEQA Scoping Comment Letter (July 28, 2010).
[43] Fred Stump, Fire Chief, Long Valley Fire Protection District, verbal correspondence (October 12, 2010).
[44] Mono County, Regional Transportation Plan (2008 Update).

4.17 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board?		✓		
b. Require or result in the construction of new water or wastewater treatment facilities or storm water drainage facilities which could cause significant environmental effects?		✓		
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			✓	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements required?		✓		
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to existing commitments?			✓	
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			✓	
g. Comply with federal, state and local statutes related to solid waste?			✓	

a. Exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The Project would generate wastewater via the concessions building including the bathrooms, showers, and sinks. An existing bathroom building is on-site. The Project includes a relocated leach field and sewer disposal system to address wastewater. The Project wastewater facilities would be installed per Mono County Health Department standards. Also, see Section 4.9, Hydrology and Water Quality (Mitigation Measure HWQ-1), and Section 4.6, Geology and Soils. Therefore, this impact would be ***less than significant with mitigation incorporated***.

b. Require or result in the construction of new water or wastewater treatment facilities or storm water drainage facilities which could cause significant environmental effects?

The Project would include the construction of new wastewater treatment facilities and storm drain facilities to adequately serve the Project. The proposed relocated leach field and sewer disposal system would be installed per Mono County Health Department standards. See Sections 4.17.a, c, and d. Thus, this impact would be ***less than significant with mitigation incorporated***.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Project includes the construction of new storm water drainage facilities to adequately drain the track and field facility. The Project also includes grading and paving that would improve existing drainage (e.g. ponding of water at existing site entrance). The storm water drainage facilities would be in compliance with Lahontan Regional Water Quality Control Board and local standards. Therefore, construction of the Project storm drain facilities would result in a ***less than significant impact***.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements required?

The Project's water would be supplied by a well adjacent to the site that is owned and maintained by the Town of Mammoth Lakes pursuant to the lease agreement with Los Angeles Department of Water and Power (LADWP). The proposed Project infield would be of a synthetic material that would not require irrigation like a natural grass facility, thereby reducing the amount of water necessary for the Project. In addition, new landscaping will be drought tolerant plants with efficient irrigation to minimize water use to that necessary to maintain the plant material. Temporary irrigation would be utilized for revegetation areas.

The Long Valley Fire Protection District (LVFPD) requires 30,000 gallon water capacity with a flow rate of 250 gallons per minute over a two hour period pursuant to PUC Rule 103. The 30,000 gallon water capacity could be provided in a single storage tank or through a combination of smaller tanks in addition to sufficient well capacity (i.e. well has an adequate recharge rate), or other alternative approved by the LVFPD[45]. A generator may also be required to provide the required pressure during a power outage. The LVFPD may allow phasing of these infrastructure requirements depending on Project phasing and other conditions[46].

[45] Fred Stump, Fire Chief, Long Valley Fire Protection District, verbal correspondence (September 15, 2010).
[46] Fred Stump, Fire Chief, Long Valley Fire Protection District, verbal correspondence (October 12, 2010).

A Water System Supply and Capacity Evaluation ("Evaluation"), Appendix E, was prepared for the Project[47]. The water storage capacity is 57,450 gallons of water, which exceeds LVFPD requirement for 30,000 gallons by 27,450 gallons. The Evaluation included a well yield test indicating the average flow rate of 190 gallons per minute with a well draw of seven feet. A pump test was also performed that produced a maximum flow of 387 gallons per minute with a residual pressure of 34 feet and 300 gallons per minute with a residual pressure of 115 feet. Therefore, the Evaluation found the existing facilities meet LVFPD requirements; however, recommendations are included that require further study. Mitigation Measure USS-1 has been incorporated to reflect the Evaluation recommendations and ensure these potential impacts are less than significant.

Mitigation Measure

USS-1: The Project shall implement recommendations 3 and 4 from the Water System Supply and Capacity Evaluation (Appendix E) regarding the existing pipe network and storage tanks manifold. The Project shall consider implementing the remaining recommendations as appropriate and feasible.

Therefore, this impact would be ***less than significant with mitigation incorporated***.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to existing commitments?

The Project includes relocation of an existing leach field and sewer disposal system; there would be no other wastewater treatment provider. Thus, this impact would be ***less than significant***.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Solid waste disposal service for the Whitmore Regional Park is currently contracted with Mammoth Disposal Incorporated. The Project is not anticipated to generate substantial amounts of solid waste due to the type of project (i.e. recreational type project, not commercial, residential, or industrial). Solid waste is disposed at the Benton Crossing Landfill, which is located further northeast along Benton Crossing Road. According to the Town of Mammoth Lakes General Plan Update Final Program Environmental Impact Report, this landfill has a remaining capacity of 1.7 million cubic yards of compacted waste generation and disposal needs for the next 20 years. Based on the type of project and existing capacity of the Benton Crossing Landfill, this impact is ***less than significant***.

[47] See Appendix E, Water System Supply and Capacity Evaluation, Peter Bernasconi, PE, Senior Associate Engineer, Town of Mammoth Lakes, October 15, 2010.

g. Comply with federal, state and local statutes related to solid waste?

The Project is required to comply with adopted programs and regulations pertaining to solid waste. Also see Section 4.17.f. Therefore, this impact is ***less than significant***.

4.18 Mandatory Findings of Significance

Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The Project site is primarily surrounded on all sides by undeveloped areas characterized by basin sagebrush vegetation. A substantial portion of the Project site is disturbed, consisting of ball fields, an animal shelter, bathroom building, dirt driveways, and parking areas. While

much of the area is currently developed as a regional park, there are several locations where stands of basin sagebrush occur. One special status animal species, the Greater Sage-Grouse (Centrocercus urophasianus), may use the basin sagebrush vegetation on the Project site for foraging. Therefore, a mitigation measure is included to reduce this impact to less than significant (see Section 4.4, Biological Resources).

The development of the Project would not disturb any known cultural resources as identified in the Phase 1 archeological survey conducted. In addition, it is not likely that unrecorded cultural resources will be disturbed due to prior site disturbances. However, mitigation measures are incorporated in the unlikely event that unknown cultural resources are discovered on the Project site (see Section 4.5, Cultural Resources). Thus, this impact would be ***less than significant with mitigation incorporated***.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The Project would expand the facilities of an existing regional park. The users of the Project are anticipated to be focused at the Project site and Whitmore Regional Park rather than dispersed in the surrounding areas. Some of the potential impacts would be short term, during construction phases, and would cease upon completion; these include short term air quality, geology and soils, hydrology and water quality, and noise impacts. The potential operational impacts of the Project would not be cumulatively considerable since the Project would be consistent with the Mono County General Plan and would obtain all necessary permits for construction and operation.

As evaluated in this Initial Study/Mitigated Negative Declaration, no Project-specific impacts were identified that could not be mitigated to a less than significant level. The Project would not be growth-inducing and would not generate an increase in population levels or substantial traffic volumes. Adjacent projects are the expansion of air service at and the development of an access road off Benton Crossing Road for the Mammoth Yosemite Airport. The additional increment of impacts associated with this Project is minimal and would be mitigated to a less than significant impact.

Aesthetic impacts related to light and glare could be regarded as "cumulatively considerable" due to the existing Mammoth Yosemite Airport and Whitmore ball field lighting and the proposed Project's lighting, which could have the potential to cumulatively affect nighttime views from scenic highways (U.S. Highway 395 and Benton Crossing Road). However, the incorporation of mitigation measures in Section 4.1.d would reduce this impact to less than

significant. Therefore, cumulative impacts to light and glare would be ***less than significant with mitigation incorporated***.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Previous sections of this Initial Study/Mitigated Negative Declaration reviewed the proposed Project's potential impacts related to aesthetics, air quality, geology/soils, greenhouse gases, hazards and hazardous materials, noise, and others related to public health and safety. It was concluded that the Project would result in less than significant environmental impact with implementation of the recommended mitigation measures. The Project would not cause substantial adverse effects on human beings, either directly or indirectly, thus, the impact would be ***less than significant***.

5.0 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration. These documents are available for review at the Town of Mammoth Lakes, 437 Old Mammoth Road, Suite R, Mammoth Lakes, California 93546.

1. Brett T. Long, Whitmore Track and Sports Complex Plans, Sheets T1, L5, L6, L7, D8, D9, D10, D11, P12, P13, and P14, June 10, 2010.
2. California Air Resources Board, *2001 CARB Ozone Transport Review*, 2001.
3. California Air Resources Board, *Climate Change Scoping Plan*, December 2008.
4. California Department of Transportation, District 9, Mrs. Gayle J. Rosander, IGR/CEQA Coordinator, Scoping Comment Letter dated July 28, 2010.
5. California Environmental Quality Act, 1970, as amended, Public Resources Code Sections 21000-21178.
6. EarthTools™, www.earthtools.org.
7. Environmental Protection Agency, National Pollutant Discharge Elimination System Compliance Monitoring, www.epa.gov/oecaerth/monitoring/programs/cwa/npdes.html
8. Gregg Miller, Wildlife Biologist, *Whitmore Park Improvement Project Biological Resources Memo*, July 11, 2010.
9. Los Angeles Department of Water and Power (LADWP), Mrs. Elsa Jimenez, Real Estate Officer, email correspondence to Town of Mammoth Lakes Public Works Director Ray Jarvis, July 13, 2010.
10. LSA Associates, *Amendment to General Biological Resources Report for the Whitmore Park Track and Sports Complex Project*, April 9, 2010.
11. LSA Associates, *General Biological Resources Report for the Whitmore Park Track and Sports Complex Project*, September 18, 2009.
12. LSA Associates, *Cultural Resources Assessment for the Whitmore Park Track and Sports Complex Project*, September 18, 2009.
13. Mono County, *Emergency Operations Plan*, September 2007. (http://www.monosheriff.org/documents/mono_eop_FINAL_401s.pdf)
14. Mono County, *Master Environmental Assessment*, 2001.
15. Mono County, *Mono County General Plan*, 1993-2009.
16. Mono County, *Mono County Code Chapter 10.16 Noise Regulation.*
17. Mono County, *Municipal Service Review and Sphere of Influence Recommendation, Long Valley Fire Protection District*, October 2009. (http://www.monocounty.ca.gov/cdd%20site/Planning/Documents/LongValleyFireProtectionDistrictOctober09.pdf)
18. Mono County, *Parks Development Plan*, March 1984.

19. Mono County, *Regional Transportation Plan 2008 Update*, February 11, 2008.

20. Mono County, *Transit Plan*, 1996.

21. Mono County Airport Land Use Commission, *Draft Environmental Impact Report and Environmental Assessment for Mammoth/June Lake Airport Land Use Plan*, July 1986 (State Clearinghouse No. 86060901).

22. Mono County Airport Land Use Commission, *Mammoth/June Lake Airport Land Use Plan*, October 1986.

23. Mono County Community Development Department, Planning Division, Ms. Heather deBethizy, Comment Letter dated received by the Town of Mammoth Lakes September 7, 2010.

24. Mono County Sheriff's Department, www.monosheriff.org.

25. Mono County and the Town of Mammoth Lakes, *Agreement for the Operation of Public Service Facilities in the Whitmore Area*, 1995.

26. Sierra Geotechnical Services Inc, *Recommendations for Structural Section and Paving*, November 16, 2007.

27. Sierra Nevada Aquatic Research Laboratory (SNARL), Daniel R. Dawson, Scoping Comment Email, July 21, 2010.

28. State of California Department of Conservation, California Geological Survey. Fault-Rupture Hazard Zones in California, Special Publication 42, Interim Revision 2007. (ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf)

29. State of California Department of Transportation Division of Aeronautics, *California Airport Land Use Planning Handbook*, January 2002. (www.dot.ca.gov/hq/planning/aeronaut/documents/ALUPHComplete-7-02rev.pdf)

30. Town of Mammoth Lakes, *Airport Access Road CEQA Conformance Review*, July 30, 2010.

31. Town of Mammoth Lakes, *Draft Parks and Recreation Master Plan,* April 2008.

32. Town of Mammoth Lakes, *Final Environmental Assessment for Proposed Operations Specifications Amendment Approval Related to the Scheduled Commercial Air Service into Mammoth Yosemite Airport by United Airlines,* June 2010.

33. Town of Mammoth Lakes, Haislip Hayes, Assistant Engineer and Jessica Morriss, Transportation Planner, *Whitmore Track and Sports Field Traffic Impact Analysis*, September 22, 2010.

34. Town of Mammoth Lakes, Peter Bernasconi, PE Senior Associate Civil Engineer, *Water System Supply and Capacity Evaluation*, October 15, 2010.

35. Triad/Holmes Associates, Preliminary Sewage Disposal System Design for High Sierra Striders Track Project, September 20, 2010.

36. Triad/Holmes Associates, Whitmore Track and Sports Complex Plans, Sheets C2, C3, and C4, June 14, 2010.

37. U.S. Department of Transportation Federal Aviation Administration*, Final Environmental Impact Statement,* March 2008.

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7.0 INVENTORY OF MITIGATION MEASURES

Aesthetics

AES-1: The Project shall conform to all standards for the Scenic Combining District and State Scenic Highway (S-C district):

a. Visually offensive land uses shall be adequately screened through the use of extensive site landscaping, fencing, and/or contour grading.

b. The natural topography of a site shall be maintained to the extent possible. Earthwork, grading, and vegetation removals shall be minimized. Existing trees and native ground cover should be protected during construction.

c. All site areas disturbed during Project construction shall be revegetated and maintained with plants that blend with the surrounding natural environment, preferably local native plants (drought resistant indigenous plants are encouraged), or other permanent erosion control installed. A landscape plan shall be submitted and approved for all projects.

d. Existing access roads shall be utilized whenever possible. Construction of new access roads, frontage roads, or driveways shall be avoided except to provide safe access to the Project's facilities.

e. New structures shall be situated on the property so as, to the extent feasible, their visibility from the state scenic highway is minimized. Structures shall be clustered where possible, leaving remaining areas in a natural state, or landscaped to be compatible with the scenic quality of the area.

f. The number, type, size, height, and design of on-site signs shall be regulated according to the applicable county sign regulations. Signs shall be compatible with the natural surroundings in color, shape, and scale. No sign shall be placed or constructed in such a manner that it silhouettes against the sky above the ridgeline or blocks a scenic viewshed.

g. The design, color, and materials for buildings, fences and accessory structures shall be compatible with the natural setting.

    i. Roofs visible from State Scenic Highway 395 shall be a dull or matte finish and in dark muted colors.

    ii. Vertical surfaces of structures should not use contrasting colors or materials and shall blend with the natural surroundings. Dark or neutral colors found in immediate surroundings are strongly encouraged for vertical surfaces and structures.

h. Fencing and screening shall not contrast in color, shape, and materials with the natural surroundings. The use of landscaping to screen utility areas and trash containers is strongly recommended.

i. All new utilities shall be installed underground.

j. Exterior lighting shall be shielded and indirect and shall be minimized to that necessary for security and safety. Light sources in exterior fixtures shall be shielded, down-directed, and not visible from State Scenic Highway 395 or Benton Crossing Road.

AES-2: Construction stockpiling and staging areas shall be located to be the least visible from scenic highways, as feasible.

AES-3: Outdoor lighting for the Project shall be approved by Mono County. The Town of Mammoth Lakes and Mono County shall evaluate different options for track and field light fixtures, height, design, number, wattage, and placement, including but not limited to:

a. Consider low-level lighting for the track that would be separate from lighting for the field.

b. Consider restricting the hours of track and field use to limit the amount of time the lights are on.

AES-4: Outdoor lights shall be shielded so they do not negatively impact aircraft engaged in take-off or landing.

AES-5: Outdoor lighting shall be consistent with the Mono County General Plan, Chapter 23, *Dark Sky Regulations*, including regulations specific to Outdoor Performance, Sport and Recreation Facilities (23.090):

a. Where playing fields or other special activity areas are to be illuminated, lighting fixtures shall be mounted, aimed, and shielded so that their beams fall within the primary playing area and immediate surroundings, and so that no significant off-site light trespass is produced.

b. The main lighting shall be turned off as soon as possible following the end of an event. Where feasible, a low-level lighting system shall be used to facilitate patrons leaving the facility, cleanup, nighttime maintenance, and other closing activities.

AES-6: Construction-related lighting shall be limited to lighting necessary for security and safety purposes. All construction-related lighting shall be located and oriented away from scenic highways and consist of the minimal wattage necessary.

AES-7: Building materials shall be low-reflectivity (also see AES-1.g).

Air Quality

AQ-1: All active portions of the construction site shall be watered to prevent excessive amounts of dust.

AQ-2: All on-site parking areas and driveways, not including overflow and maintenance parking areas, shall be paved as soon as feasible or watered periodically or otherwise stabilized until paved. The unpaved overflow and maintenance parking areas shall be stabilized to the satisfaction of Mono County.

AQ-3: On-site vehicles shall be limited to a maximum speed of 15 miles per hour until the on-site parking areas and driveways are paved.

AQ-4: All construction equipment shall be equipped with required exhaust systems and mufflers.

AQ-5: All necessary permits shall be obtained from Great Basin Unified Air Pollution Control District prior to commencement of construction activities.

AQ-6: The Project shall provide bus parking and adequate turn-around space.

Biological Resources

BIO-1: Vegetation clearing should be done between September 1 and March 30, outside the Greater Sage-Grouse nesting season. If vegetation must be cleared between April 1 and August 31, the Greater Sage-Grouse nesting season, then a nesting Greater Sage-Grouse survey should be conducted by a qualified biologist no more than one week prior to clearing. If nesting Greater Sage-Grouse are found, then no clearing should be done within 300 feet of any active nest.

Cultural Resources

CULT-1: If cultural resources are identified during ground disturbance associated with the Project, ground disturbing activities near the find shall cease, and an archaeological monitoring program should be implemented. The monitoring program shall be managed by an archaeologist who meets the *Secretary of the Interior's Professional Qualification Standards*. The archaeological monitoring program shall include provisions for an archaeological monitor; assessing the significance of archaeological finds; consideration of avoidance and minimization of impacts to significant archaeological resources (in consultation with the Town and Mono County); mitigation measures including archaeological excavation, laboratory analysis, reporting, and curation; and consultation with Indian Tribes if resource is prehistoric in nature.

CULT-2: If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the fin immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify the Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection with in 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Geology and Soils

GEO-1: A building permit shall be obtained for the concessions building to ensure that all applicable Uniform Building Code standards and requirements of the Alquist-Priolo Earthquake Fault Zoning Act are met.

GEO-2: All recommendations of the Sierra Geotechnical Services, Inc Recommendations for Structural Section and Paving (2007) including but not limited to foundation preparation and design, concrete slab-on-grade, preliminary pavement recommendations, and earthwork and grading specifications, shall be implemented. This shall be reviewed prior to the issuance of building and grading permits.

Hazards and Hazardous Materials

HAZ-1: The Project shall be approved by Mono County to ensure all Airport Land Use Plan regulations are met. This may also include consideration and approval by the Airport Land Use Commission.

HAZ-2: The Long Valley Fire Protection District shall review and approve the Project plans in coordination with Mono County, such as through the provision of a will-serve letter.

Hydrology and Water Quality

HWQ-1: All wastewater treatment and disposal systems shall be designed, constructed, and maintained in accordance with requirements established by the Lahontan Regional Water Quality Control Board and Mono County Health Department. Waste discharge permits shall be obtained prior to the installation of wastewater facilities.

HWQ-2: The Project shall install adequately designed drainage retention facilities in accordance with the Lahontan Regional Water Quality Control Board requirements. A drainage and erosion control plan shall be submitted to the Lahontan Regional Water Quality Control Board and Mono County Public Works Department prior to grading activities.

HWQ-3: All exposed soil areas shall be stabilized and/or reseeded according to an approved landscape/revegetation/erosion control plan. All stockpiles of unsuitable soil materials shall be removed and disposed of at an approved site(s) designated by Mono County.

HWQ-4: A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared with the grading plans to fulfill regulatory requirements.

HWQ-5: Permanent erosion control measures shall be placed on all graded slopes. No graded areas shall be left unstabilized between October 15th and April 15th.

Land Use and Planning

LUP-1: A use permit for the Project shall be approved by the Mono County Planning Commission to ensure Project consistency with the Mono County General Plan.

LUP-2: Special event permits shall be required for special events on the Project site. Special event permits shall regulate the number of people and parking and staging areas on the Project site, as well as other issues, such as noise. No parking or staging shall be permitted outside of designated areas (e.g. undisturbed areas).

LUP-3: The parking areas shall be reconfigured and/or redesigned as necessary to provide adequate bus parking and turnaround space, while still providing the required vehicle parking spaces for the Project and the existing ball fields.

Public Services

PS-1: The Town of Mammoth Lakes shall consider expansion of snow removal operations at the Project, if year round use of the Project is desired. The Project's snow removal level of service shall be established at a level that would have no impact on the Town's existing prioritization list of snow removal operations and levels of service within Mammoth Lakes (Town of Mammoth Lakes Public Works Department Snow Management Policy[1]).

[1] www.ci.mammoth-lakes.ca.us/documents/Public%20Works/Public%20Works%20Maintenance (Snow Management Policy, Effective Date 1/18/06).

Utilities and Service Systems

USS-1: The Project shall implement recommendations 3 and 4 from the Water System Supply and Capacity Evaluation (Appendix E) regarding the existing pipe network and storage tanks manifold. The Project shall consider implementing the remaining recommendations as appropriate and feasible.