3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES
3.8 EMPLOYMENT, POPULATION, AND HOUSING

This section assesses the effects of project implementation as it relates to employment, population, and housing within a local and regional context. The geographic areas of analyses include the Town of Mammoth Lakes and Mono County. The California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) focus on the physical effects of a project. Generally, economic and social changes resulting from a project are not treated as physical effects on the environment. Employment, population, and housing impacts are typically economic or social in nature, although the analysis of such impacts often supports other impact analyses. The analysis identifies any potential physical changes that may be caused by employment, population, and/or housing impacts resulting from the project. Information contained in this section is based on the Town of Mammoth Lakes 2005 General Plan Update Draft Environmental Impact Report; data from the State of California Employment Development Department (Labor Market Division); data from the U.S. Census Bureau; and the 2003 Housing Element of the Town's General Plan.

3.8.1 REGULATORY FRAMEWORK

As discussed in Section 3.2, Land Use, the project site consists of private and public lands, which together comprise approximately 8.67 acres. Since a portion of the project site is located within the Town of Mammoth Lakes, the project is subject to the goals and policies set forth in the 2003 Housing Element of the Town of Mammoth Lakes General Plan. Goals and policies from the Housing Element that are relevant to the proposed project are discussed in this section. In addition, the project site is located within the Juniper Springs Master Plan Area, and as such, is subject to the Juniper Ridge Master Plan with regard to affordable housing requirements. The project is also subject to the regulations regarding affordable housing that are contained in Title 17 of the Town Municipal Code.

The project site is also located on lands within the Inyo National Forest, which is administered by the USDA Forest Service. The Land and Resource Management Plan of the Inyo National Forest (the Forest Plan) provides management direction to protect the natural resources of the forest while administering the development of forest lands in way that is compatible with Forest Service goals and objectives. The MMSA Development Plan (the Development Plan) is the conceptual guide for buildout of MMSA's facilities. The Development Plan provides the foundation for the Forest Service Special Use Permit under which MMSA operates and applies only to lands administered by the Forest Service. Employee housing is addressed in the Development Plan; however, the housing demand discussed is specific to the Minaret Facilities area, and as such, is not applicable to the project. Therefore, since both the Forest Plan and the Development Plan do not address residential populations, housing demand, or employment that is relative to the project site, these documents are not relevant to these analyses.

a. Town of Mammoth Lakes General Plan Housing Element (2003)

The Town of Mammoth Lakes General Plan, which was adopted in 1987, is intended to promote the public health, safety, and general welfare of the community. The General Plan comprises an Introduction and seven elements that each address particular issue areas. Applicable to the analysis contained within this section is the Housing Element of the General Plan. Under California law, the Housing Element of a General Plan must be updated every five years and is subject to mandatory review by the California Department of Housing and Community Development. The Town's Housing Element was updated and certified by the California Department of Housing and Community Development on December 29th 2003.

The Housing Element provides a comprehensive analysis of housing needs, including current population, housing stock characteristics, and employment. In addition, the Housing Element identifies market and governmental resources and constraints, and provides for a housing program that includes goals, policies, and implementation measures. The following are the goals and policies contained within the Housing Element of the Town's General Plan that are applicable to the proposed project:

Goal 1

To ensure the provision of a variety of housing types suitable to the needs of the different social and economic segments of Mammoth Lakes' population.

Goal 2

Housing programs and opportunities that maximize choice, and avoid discrimination based upon age, ethnic background, sex, marital status, handicaps, or family size.

Goal 3

Energy efficient structures and sites.

Policy 3.A.

The Town shall work to assure that all new development is energy efficient.

The Town is currently in the process of revising its General Plan. The 2005 Draft Updated General Plan maintains the same list of goals and policies for housing and, therefore, the list of goals and policies provided above would apply to the proposed project.

b. Juniper Ridge Master Plan

As indicated above, the project site is located in the Juniper Ridge Master Plan (the Master Plan) Area. As discussed in more detail in Section 3.2, Land Use, the Master Plan primarily establishes permitted uses and development standards for proposed projects within the Master Plan Area. The Master Plan also recognizes a need for employee housing and, as such, requires that project applicants submit an employee housing plan and program for approval by the Town Planning Commission. The plan and program must provide for the needs of full time equivalent employees (FTEE) that would be generated by the project, such that employees must be housed either on site or at a location off site. The Town Council would review and grant final approval of the plan and program, and a certificate of occupancy for the project would be issued only after the required employee housing is established.

c. Town Municipal Code

In October 2001, the Town Council adopted Section 17.36, Affordable Housing Mitigation Regulations (AHMR), of the Zoning Code. AHMR addresses the impacts of new development on the supply of affordable housing.[64] Under the AHMR, new developments must provide housing for the estimated number of employees that earn below median income levels, or 58.5% of its full time equivalent employees (FTEE). In addition, the AHMR requires that the developer submit a Housing Mitigation Development Plan (HMDP). The HMDP must contain the following, which is subject to approval by the Town:

- The housing requirements generated by the project;
- The method or combination of methods by which housing is to be mitigated;
- The timetable for the mitigation;
- A description of the land proposed and the type, number and unit size of the proposed housing plus any management/operational plans;
- Preliminary plans showing the site and floor plans;

[64] *"Affordable housing" is defined by Section 17.36.020 of the Zoning Code as "housing that is restricted as to rental rate or sales price based upon household income and size criteria as defined by the state of California or the town of Mammoth Lakes."*

- The proposed rent or sales prices; and

- A statement as to the way that the HMDP meets the intent of these regulations.

Section 17.36.030 of the Zoning Code provides a formula that is used to determine the standard number of FTEE by land use type based on square footage for particular uses. The formula is based on the land use category's pro rata share of the aggregate induced demand for employment in town, rather than direct employee generation. Section 17.36.030D indicates the provision rate for mitigating the employee housing demands created by new development. All calculations are based upon one FTEE equaling a minimum of 250 square feet of living space. The total square footage is then converted to number of units or bedrooms.

d. Transient Occupancy Tax

An ordinance, Measure "T", approved in June 2006 set the transient occupancy tax rate at 13 percent, effective October 1, 2006. The tax is to be imposed on transient visitors to the Town and is to be collected at the time rent to a transient occupancy facility is due. The ordinance directs the Town to deposit transient occupancy tax revenues into the Town's General Fund for general government-related purposes.

3.8.2 AFFECTED ENVIRONMENT

a. Employment

In February 2006, the Town's estimated labor force totaled 5,700. By comparison, Mono County's labor force in February 2006 comprised approximately 9,540 people. As such, nearly 60% of the County's employment was based in the Town of Mammoth Lakes. Approximately 200, or 3.5%, of the Town's estimated labor force was unemployed in February 2006, while Mono County had an unemployment rate of 4%.[65]

The Town's economy is largely based on its year-round tourism, and specifically its ski facilities and summer recreation activities. As shown in Table 51 on page 310, the majority of the Town's population is employed by the arts, entertainment, recreation and services sector, followed by education and health and social services. Historically, typical seasonal workers have been of college-age or early 20s, without families. Jobs that have been filled by these employees generally are service-related and low-paying, with the length of employment and

[65] *State of California Employment Development Department (Labor Market Division)*

Table 51

Town of Mammoth Lakes Employment by Industry (2000)

Industry Type	Number of Employees	Percent
Agriculture, forestry, fishing and hunting, and mining	40	0.9
Construction	350	8.1
Manufacturing	113	2.6
Wholesale trade	77	1.8
Retail trade	424	9.8
Transportation and warehousing, and utilities	60	1.4
Information	46	1.1
Finance, insurance, real estate, rental and leasing	166	10.8
Professional, scientific, management, administration	379	8.8
Education, health and social services	482	11.2
Arts, entertainment, recreation, and services	1,598	37.1
Other services	117	2.7
Public administration	161	3.7
TOTAL	4,013	100%

Source: Census Bureau (2000 Census, SF3:P49)

number of hours worked dependent upon timing and amount of snowfall. In warmer-weather months, these employees fill other positions within the Town, leave the area, or are unemployed.

Median per capita income for the Town was $24,526 in 1999, according to the 2000 Census. Approximately 14.4%, or 1,018, individuals and 8.4%, or 134, families were below the poverty level. The median per capita income for Mono County in January 2002 was $46,000.[66]

Currently, there are 46 people employed during the peak winter season by the Little Eagle Base Lodge. The facility includes ticketing, a restaurant, a bar/coffee bar area, limited retail and administration of the base lodge. The facility is open only during peak winter season and, as such, provides seasonal employment opportunities. The restaurant is also used periodically during the summer and fall for special events.

b. Population

Due to its nature as a resort destination community, the Town characterizes population intensity by permanent residents as well as transient residents and visitors. As the Town is principally a tourism-based economy, resident populations fluctuate seasonally. According to

[66] *Town of Mammoth Lakes 2005 General Plan Update Draft EIR; Section 4.9, Population, Housing and Employment.*

the 2000 Census, there were 7,093 permanent residents living in the Town, which accounts for more than half of the 12,853 residents in Mono County (refer to Table 52, on page 312). Between 1990 and 2000, the Town's population grew by 48%. The population of Mono County, by comparison, grew slower, at a rate of approximately 29% between 1990 and 2000. The Town's resident population has increased by approximately 80% since 1985, and more than 48% since 1995. These increases are substantially greater than growth experienced by the State of California, which had a 13.8% increase in its overall population between 1990 and 2000.[67]

According to Census estimates of population trends, approximately 7,259 people were residents of the Town in 2004, which represents a 2% growth in the permanent resident population since 2000. In contrast, the population of Mono County was estimated at 12,766 in 2004, which represents a decrease in the permanent population by 0.7%. The permanent resident population of the Town is anticipated to grow to 11,000 people by 2023, according to the 2003 Housing Element.

The Town's General Plan (1987) expresses population intensity as "persons at one time" (PAOT). In addition, the capacity of the Eagle Lodge facility is expressed as the Peak Design Capacity (PDC). PDC is the number of skiers that can be supported by the MMSA's ski lifts and trail system or the daily lift capacity.[68]

The Town has estimated that the average peak PAOT in 2004 was 34,265, which represents the average winter Saturday.[69] Under the Town's 1987 General Plan, population at one time at buildout is estimated at 61,375 PAOT. Buildout under the 2005 Draft General Plan Update is estimated at 60,727 PAOT. With regard to PDC, MMSA currently accommodates more than 20,000 skiers, and has a capacity of 24,000 skiers. The PDC of Eagle Lodge is 5,960 persons.

c. Housing

There is no housing within the project site, which is currently developed with a surface parking lot. However, within the project area, Mammoth Vista I single family subdivision is located to the north of the project site and the Summit Condominiums are located to the south of

[67] *Ibid.*

[68] *The daily lift capacity is calculated as a product of the uphill lift capacity (vertical supply or VTF/day) of all lifts at the resort and the amount of vertical consumed by the average skier (vertical demand) on each lift.*

[69] *Town of Mammoth Lakes 2005 General Plan Update Draft EIR. To calculate PAOT, the Town used a person/unit occupancy, based upon the Census average of 2.4 people per household for all units occupied by permanent residents. A person/unit occupancy of 4.0 was applied to all remaining visitor, second home, and season resident units.*

Table 52

Town of Mammoth Lakes and Mono County Populations (1990-2004)

	1990	2000	2004 *
Town	4,785	7,093	7,259
County	9,956	12,853	12,766

* *Projections provided by Census Bureau*

Source: Census Bureau, 1990 and 2000.

the site across Meridian Boulevard. The Juniper Springs Lodge is located immediately to the west of the site and a multi-family residential development is located further west of the Juniper Springs Lodge.

As shown in Table 53 on page 313, there were an estimated 7,958 housing units in the Town in 2000, an increase of 856 units as compared to 7,102 housing units in 1990. This represents a 12% increase of the housing stock over a 10-year period. In Mono County in 2000, there were approximately 11,757 housing units, compared to 10,664 units in 1990, representing an approximate 10% increase over that decade.[70]

Multi-family units are the Town's most prevalent housing type, as indicated in Table 53. From 1990 to 2000, apartments comprising 20 or more units increased more than any other housing type, with an 86% rate of growth. The majority of the Town's housing stock was built between 1970 and 1979, with 3,748 units constructed in that period. Only 115 units were built prior to 1950. Approximately 609 housing units, which represent 8% of the Town's housing stock, were built between 2000 and 2003.

Since the Town is a recreation destination, a majority of the housing units are not occupied year-round. Based on the 2000 Census, 4,579, or 57.5%, of the Town's total housing units were used for seasonal, recreational, or occasional use, while 2,814, or 35.4%, were occupied year-round. As shown in Table 54 on page 313, of the 2,814 year-round occupied units, approximately 52.8% were owner-occupied housing and 47.2% were renter-occupied housing. This represents a change in the balance of owner-occupied and rental housing. In comparison, there were more renters in 1990; of the 1,952 occupied housing units, 44% were owner-occupied and 56% were renter-occupied units. Families comprised nearly 55% of the Town's households in 2000.

[70] *1990 Census STF-1 data.*

Table 53

Housing Units by Type (1990-2000)

Housing Unit Type	1990		2000		Change	
	Number	Percent	Number	Percent	Number	Percent
Single-Family Detached	1,671	23.5	2,122	26.7	451	27
Single-Family Attached	588	8.3	965	12.1	377	64
2 units	325	4.6	301	3.8	-24	-7
3-4 units	1,300	18.3	1,239	15.6	-61	-5
5-9 units	1,310	18.4	1,169	14.7	-141	-11
10-19 units	1,018	14.3	749	9.4	-269	-26
20+ units	655	9.2	1,220	15.3	565	86
Mobile Homes	177	2.5	183	2.3	6	3
Boat, RV, van, etc.	58	0.8	10	-0.1	-48	-83
TOTAL	**7,102**	**100%**	**7,958**	**99.7%**	**856**	**12%**

Source: Census Bureau (2000 Census, SF3:H30) and (1990 Census, SF:H20)

Table 54

Households by Tenure (1990-2000)

	1990		2000		Change	
	Number	Percent	Number	Percent	Number	Percent
Owner	858	44	1,485	53	627	73
Renter	1,094	56	1,329	47	235	22
TOTAL	**1,952**	**100**	**2,814**	**100**	**862**	**44**

Source: Census Bureau (2000 Census, SF3:H30)

Given the rising number of second homeowners in the Town, a survey was conducted in March and April 2005 in order to gauge the ways in which second homeownership affected the local economy. The survey found that second homeowner properties were occupied about 25.7 weeks on average, or 49% of the year. Second homeowner properties were used during the winter season for approximately 10 weeks on average, and during the summer for approximately 8 weeks. These properties were occupied for an average of 7.4 weeks during the spring and fall. In addition, between 45% and 51% of condo/townhouse owners reported using their property as a vacation rental, versus only 3% of single-family homeowners.[71]

[71] *Mammoth Lakes 2005 Second Homeowner Survey Results, August 2005.*

Overall, increasing real estate values and escalating rents in the Town have made housing prohibitively expense for both seasonal and year-round employees. As such, these employees have either relocated outside the Town to areas that are more affordable or have lived in overcrowded conditions.

With regard to overcrowding, according to the Town's Housing Element, 301 of the Town's 2,814 households, or approximately 11%, were living in overcrowded conditions in 2000.[72] By comparison, the statewide average for overcrowding in 2000 was 15.2%. In 2000, MMSA employees had an average of 2.8 roommates, in contrast with the 2.3 roommates of the average Mammoth area employee.[73] Since the Census does not account for seasonal overcrowding, the number of overcrowded households in the Town may have been greater than the number represented. MMSA owns and operates units within the area on privately owned lands to address the housing need for seasonal employees. Specifically, MMSA owns properties containing up to 533 individual beds and leases properties containing an additional 114 beds, totaling 647 beds dedicated to the seasonal housing demand of MMSA.

In order to provide for a larger stock of workforce housing, in 2003 the Town established the Mammoth Lakes Housing, Inc., a private, non-profit organization.[74] The Town, MMSA, and Intrawest Corporation made initial start-up contributions to the organization.

As a result of the Town's initiatives to provide more affordable housing, more than 282 deed-restricted, affordable residential units were developed.[75] The total number of deed-restricted bedrooms (existing or planned) in the Town is approximately 572.[76] Section 17.36.020 of the Zoning Code defines deed restriction as "a recorded contract entered into between the town of Mammoth Lakes and the owner or purchaser of real property identifying the conditions of occupancy and resale."

[72] *Town of Mammoth Lakes Housing Element, 2003. Overcrowded households are those with 1.01 or more persons per room, and severely overcrowded units are those with more than 1.5 persons per room.*

[73] *Town of Mammoth Lakes Housing Element, 2003. Census data may not reflect data specific to MMSA employees, as many ski area employees are not permanent residents of the Town.*

[74] *http://www.mammothlakeshousing.com/*

[75] *Town of Mammoth Lakes Housing Element, 2003.*

[76] *Town of Mammoth Lakes 2005 General Plan Update Environmental Impact Report.*

3.8.3 ENVIRONMENTAL CONSEQUENCES

a. CEQA Significance Criteria

Impacts to employment, population, and housing would be considered significant if:

- The project would induce substantial population growth directly or indirectly; or
- The project's construction or operation would substantially alter the location, distribution, density, or growth rate of employment, population, and/or housing planned for the area.

b. Methodology

The analysis contained in this section is based on data from the U.S. Census Bureau, the State of California Employment Development Department (Labor Market Division), the Town of Mammoth Lakes 2005 General Plan Update Draft Environmental Impact Report, and information provided by MMSA as part of the application materials. The analysis addresses the potential impacts of the proposed project relative to employment, population, and housing. The analysis is also based on a review of applicable planning documents, including the 2003 Housing Element of the Town's General Plan, the Juniper Ridge Master Plan, and the Town's Zoning Code. The analysis includes an evaluation of the project's consistency with the applicable policies and regulations described above.

For purposes of analysis, employment generated by the project is expressed in terms of full time equivalent employees, or FTEE. Section 17.36.020 of the Zoning Code defines FTEE as a full-time employee or combination of part-time employees. When an employee generation calculation results in seasonal or part-time employees, those employees are grouped together to form FTEEs. A full-time, year-round employee is equivalent to one FTEE, while part-time, year-round employees and full-time seasonal employees are equivalent to one-half FTEE. A part-time, seasonal employee is equivalent to one-quarter FTEE. See Table 55 on page 316 for a breakdown of how FTEE is calculated.

c. Environmental Consequences of the Proposed Action

(1) Construction

Construction employment opportunities are most often regional in nature, such that employees in the construction industry may work at different locations throughout a county, depending upon where the construction is located. These employees do not typically relocate

Table 55

Employee Generation by Use

1. Multi-unit[a] and Single Family[b] Transient	.0005 per square feet	
2. Commercial/Office Uses: Includes all non-residential except industrial.	.00042 FTEE per square feet	
3. Industrial Uses: Includes all uses involving manufacturing, distribution and warehousing.	.00011 FTEE per square feet	
4. Multi-unit non-transient: This category includes all attached dwelling units including deed restricted and market rate apartments and multi-family condominiums which prohibit transient rentals. This includes all multi-unit developments located within the Residential Multi-Family 1 zone and Affordable Housing zone and any other multi-unit development in town that prohibits transient rental.	Market Rate Units	.00012 FTEE per square feet
	Rental Apartments and Deed Restricted Units	0 FTEE
5. Single-family non-transient. This category of land use encompasses all detached dwelling units located in the Town's Low Density Residential [LDR] land use designation and includes both the Rural Residential and Residential Single Family zones.	For that portion of the building area from: 0-2,000 square feet, .00006 FTEE per square feet 2,001-4,000 square feet, .00009 FTEE per square feet 4,001-6,000 square feet, .00012 FTEE per square feet 6,001-8,000 square feet, .00015 FTEE per square feet 8,001 square feet and up, .00018 FTEE per square feet *Calculate the building square footage between 0 and 2,000 square feet at rate as shown. Then, for square footage exceeding 2000 square feet calculate at rates as shown. Continue until all square footage has been calculated. Add all lines for total.	
6. Uses not listed.	To be determined by Community Development Director based upon comparisons with like businesses.	

[a] *This category includes all attached dwelling units within the Resort, Specific Plan, Commercial General, Commercial Lodging and Residential Multi-family 2 zones which are either intended for transient occupancy or can be rented out on a nightly basis. These include all hotel, motel, fractional and resort condominium lodging as well as condominium units which are privately owned and can be rented out on a nightly basis.*

[b] *This category of land use encompasses all detached dwelling units located within the Resort and Specific Plan zones which are permitted by Master Plan and/or Specific Plan conditions to be rented out on a nightly basis.*

Source: Section 17.36.030, Town of Mammoth Lakes Zoning Code

closer to a construction site, as the length of time spent at a specific job site is limited. Construction employment associated with the project is anticipated to draw from the regional population. However, in the event that construction workers are drawn from outside Mono or Inyo Counties, a mitigation measure is recommended that would provide for the temporary housing of such employees. With the implementation of the mitigation measure, construction employment at the project site would not substantially alter the location, distribution, density, or growth rate of construction employment in the Town or Mono County. Therefore, impacts associated with construction employment would be less than significant.

(2) Operation

(a) Employment and Population

The project would increase the recreational capacity of the area by providing a year-round resort facility that would offer a range of recreational and commercial opportunities for visitors. The project would provide food and beverage service, including a full-service restaurant, skier services, as well as other commercial uses, such as a day spa, convenience market, conference facilities, and a retail store. The project also would provide lodging facilities that would, under both options being considered, include associated concierge services.

The proposed recreational, commercial, and lodging facilities would generate service-related employment opportunities. The project would employ both part time and full time workers in shifts. While the facility would provide year round employment opportunities, the greater demand for employees would occur during the ski season. The highest number of employees on site would be expected to occur on Saturdays during the ski season. During an average peak Saturday, the number of employees on the site at a given time would likely range from a low of 29 to a high of approximately 176 employees. The peak employee generation would occur mid day, between 8:00 A.M. and 5:00 P.M. The number of employees during this time period would range from between 111 to 176, with the greatest number of employees working at the 10 A.M. and 11 A.M. shifts. A peak of 176 employees would represent a net increase of 130 employees under the project, compared with the 46 employees currently at the site. Overall, the majority of workers on site during an average peak Saturday during the ski season would be employed in food and beverage, the ski and snowboard school, and in housekeeping.

(b) Housing

Project implementation would generate a demand for two types of housing: transient lodging and affordable housing units.

(i) Transient Housing

As the project would increase the recreational capacity of the Town, a greater number of facilities could accommodate a greater number of visitors to the project site. As such, under the project, the number of skiers are anticipated to increase and, therefore, a demand for transient housing would likely increase as well. As discussed above, the project would provide transient housing under the two potential lodging options that would accommodate additional skier populations. The project would provide for 62 condo/hotel and 21 fractional ownership units, for a total of 83 units under the first lodging option. Together, the condo/hotel and fractional ownership units could provide accommodations for up to 360 people. The hotel only option would provide 213 rooms which, assuming two persons per room, could provide accommodations for approximately 426 people.

Given the above, the project would be consistent with Goals 1 and 2 of the 2003 Housing Element, since the lodging proposed under the project would ensure the provision of housing for the tourist/visitor segment of the population. Neither the condo/hotel and fractional ownership option nor the hotel only option would discriminate based on age, ethnic background, sex, marital status, handicaps, or family size. The project would comply with the Americans With Disabilities Act (ADA) and would provide family-oriented accommodations.

In addition, the project would provide for energy-efficient facilities, as the architecture and construction would comply with the Leadership in Energy and Environmental Design (LEED) guidelines. LEED is a rating system developed by the U.S. Green Building Council to reduce environmental impacts through construction best practices. Under LEED, emphasis is placed on architecture and design, and performance standards are rated in five categories: (1) sustainable sites; (2) water efficiency; (3) energy and atmosphere; (4) materials and resources; and (5) indoor environmental quality.[77] CEQA does not require a project to be rated by the LEED system. However, the project as proposed would employ sustainable building practices, such as using recycled materials and implementing energy-saving measures in excess of Title 24, Energy Efficiency Standards for Residential and Nonresidential Buildings, of the California Code of Regulations. Given the above, the project would be consistent with Goal 3 of the 2003 Housing Element, which encourages energy-efficient structures and sites. The project would also be compatible with Housing Element Policy 3.A., which calls upon the Town to assure that all new development is energy efficient.

(ii) Affordable Housing

As the project would increase the number of FTEEs, the project would generate an accompanying demand for affordable housing. Some of the FTEEs necessary to fulfill the project’s employment demand would likely be drawn from both the local and regional workforce. However, for purposes of this analysis, it is assumed that all FTEEs would be not be Town residents, and therefore, would require new housing within the Town boundaries.

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[77] *https://www.usgbc.org/Docs/LEEDdocs/LEED-NC_checklist-v2.1.xls*

As required by the Juniper Ridge Master Plan and the AHMRs of the Town's Zoning Code, MMSA is required to submit with its application an Affordable Housing Mitigation Plan (AHMP) for the FTEEs generated by the project. The AHMP would indicate the number of employees that would be generated by each of the project's land uses and the number and type of required affordable housing to meet the Town's mitigation requirements. It is anticipated that MMSA would provide affordable housing at off-site locations. Such housing would be located within the Town boundaries as required by the AHMRs. It is anticipated that the affordable housing would be provided through the conversion of existing structures, and that no new development would be associated with the provision of the required affordable housing.

The project would generate an increase in construction and operation employment opportunities beyond current conditions, which could be considered a project benefit. In addition, since the affordable housing proposed under MMSA's AHMP is anticipated to involve the conversion of units, rather than new development, no environmental impacts with regard to the provision of affordable housing would occur. As such, the project's construction and operation would not substantially alter the location, distribution, density, or growth rate of the Town's employment, population, or housing, as planned for the area. Therefore, impacts resulting from project implementation would result in a less than significant impact to employment, population, and housing.

d. Mitigation Measures

In the event that construction workers are drawn from outside Mono or Inyo Counties the following mitigation measure is recommended to reduce potential short-term housing impacts to a less than significant level.

POP-1: If the developer of the project enters into a construction contract for the project with any contractor or subcontractor (1) whose principal place of business is outside Mono and Inyo Counties; (2) whose employees will reside in the Town of Mammoth Lakes in association with project construction in excess of 90 consecutive days; and (3) who provides housing for its employees, then the developer shall provide housing units for such employees. The housing provided by the developer for the construction employees shall not be located within the RMF-1 zone within the boundaries of the Town of Mammoth Lakes. However, existing MMSA-owned seasonal employee housing may be utilized in non-ski season months only.

In addition, under the Juniper Ridge Master Plan and the AHMR, the project applicant is required to submit an affordable housing plan for employees generated by the project. Compliance with a regulatory requirement is not considered a mitigation measure under CEQA. Therefore, with implementation of the mitigation measure, above, and the applicant's AHMP, the project would result in a less than significant impact to employment, population, and housing.

e. Environmental Consequences of Alternative 1 - Development in Accordance with Existing Regulations Alternative

Alternative 1 would include the development of 35,000 square feet of commercial uses and a 566-space parking structure. Under the Alternative there would be no residential component and, therefore, no provision of transient lodging facilities. However, the Alternative itself would not generate an increase in the transient population.

Construction of Alternative 1 would result in an increase in the number of construction-related employees on the site. In the event that construction workers are drawn from Mono or Inyo Counties, the incorporation of Mitigation Measure POP-1, which relates to the provision of housing for construction employees, would reduce potential short-term housing impacts to a less than significant level.

With the development of commercial ski-related facilities, there would be an accompanying demand for service-related employment opportunities. Employees would be needed for such uses as food and beverage service, ticketing, and other ski-related services that had previously existed as part of the temporary Little Eagle Base Lodge. Alternative 1 would employ both part time and full time workers in shifts. Alternative 1 would generate up to 70 employees based on a general planning standard of 1 employee per 500 square feet of floor area. Alternative 1 would increase the number of full-time equivalent employees in the Town. Therefore, an accompanying demand for affordable housing would be generated. As required by the Juniper Ridge Master Plan and the Affordable Housing Mitigation Regulations (AHMR) of the Town's Zoning Code, MMSA would be required to submit an Affordable Housing Mitigation Plan (AHMP) for the FTEEs generated by the Alternative. The AHMP would indicate the number of employees that would be generated and type of required affordable housing to meet the Town's mitigation requirements. With compliance with the Town's requirements with regard to affordable housing, Alternative 1 would result in a less than significant impact with regard to employment, population, and housing.

f. Environmental Consequences of Alternative 2 – Reduced Intensity Alternative

Alternative 2 would provide residential accommodation or hotel rooms, and a mix of commercial uses. Construction of Alternative 2 would result in an increase in the number of construction-related employees on the site. In the event that construction workers are drawn from Mono or Inyo Counties, the incorporation of Mitigation Measure POP-1, which relates to the provision of housing for construction employees, would reduce potential short-term housing impacts to a less than significant level.

Alternative 2 proposes recreational, commercial, and lodging facilities that would generate service-related employment opportunities. This Alternative would employ both part time and full time workers in shifts. While the facility would provide year round employment opportunities, the greater demand for employees would occur during the ski season. The highest number of employees on site would be expected to occur on Saturdays during the ski season. During an average peak Saturday, the number of employees on the site at a given time would likely range from a low of 18 to a high of approximately 112 employees. The peak employee generation would occur mid day, between 8:00 A.M. and 5:00 P.M. The number of employees during this time period would range from between 70 to 112, with the greatest number of employees working at the 10 A.M. and 11 A.M. shifts. A peak of 112 employees would represent a net increase of 66 employees under Alternative 2, compared with the 46 employees currently at the site. Overall, the majority of workers on site during an average peak Saturday during the ski season would be employed in food and beverage, the ski and snowboard school, and in housekeeping.

Alternative 2 would generate a demand for affordable housing based on the increase in full-time equivalent employees that would result from implementation of Alternative 2. As required by the Juniper Ridge Master Plan and the Affordable Housing Mitigation Regulations (AHMR) of the Town's Zoning Code, MMSA would be required to submit an Affordable Housing Mitigation Plan (AHMP) for the FTEEs generated by Alternative 2. The AHMP would indicate the number of employees that would be generated and type of required affordable housing to meet the Town's requirements. Given compliance with the Town's requirements associated with affordable housing, Alternative 2 would result in a less than significant impact with regard to employment, population, and housing.

g. Environmental Consequences of Alternative 3 – Alternate Design Alternative

Alternative 3 would generate the same number of transient visitors to the site and PDC as the Proposed Action. Construction of Alternative 3 would result in an increase in the number of construction-related employees on the site. In the event that construction workers are drawn from Mono or Inyo Counties, the incorporation of Mitigation Measure POP-1, which relates to the provision of housing for construction employees, would reduce potential short-term housing impacts to a less than significant level.

Alternative 3 would generate a demand for affordable housing based on the increase in full-time equivalent employees that would result. As required by the Juniper Ridge Master Plan and the Affordable Housing Mitigation Regulations (AHMR) of the Town's Zoning Code, MMSA would be required to submit an Affordable Housing Mitigation Plan (AHMP) for the FTEEs generated by Alternative 3. The AHMP would indicate the number of employees that would be generated and type of required affordable housing to meet the Town's mitigation requirements. With compliance with the Town's requirements with regard to affordable housing, Alternative 3 would result in a less than significant impact with regard to employment, population, and housing.

h. Environmental Consequences of Alternative 4 - No Action Alternative

While the No Action Alternative assumes the removal of the temporary Little Eagle Base Lodge, the number of visitors to the area could remain unchanged. However, Alternative 4 would result in a decrease in employment and a subsequent decrease in the demand for affordable housing.

The No Action Alternative would not provide lodging for the transient population or increase the employment opportunities within the Town. As such, the goals and policies of the 2003 Housing Element would not apply to the project site. In addition, the No Action Alternative would not be subject to either the Master Plan, relative to employee housing, or the AHMRs. No plans or programs to develop affordable housing, such as those required by the Master Plan or the AHMRs, would be necessary. As no new housing would be built under the No Action Alternative, the Transient Occupancy Tax would not apply to the project site as it currently exists.

Given that PAOT and the number of skiers would remain similar to current conditions and there would be no new demand for housing under the No Action Alternative, impacts associated with population and housing would be less than those projected for the project. However, given that the No Action Alternative would not provide an increase in construction and operation employment opportunities, or an increase in visitor revenues, the No Action Alternative would not provide beneficial effects that would occur with the Proposed Action.