COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT
P.O. Box 1609, Mammoth Lakes, CA 93546
Phone (760) 934-8989 | Fax (760) 934-8608
www.townofmammothlakes.ca.gov

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING

Date: May 29, 2015

To: Responsible Agencies, Trustee Agencies, Involved Federal Agencies, Affected Property Owners, and Agencies/People Requesting Notice

From: Town of Mammoth Lakes
Community & Economic Development Department
P.O. Box 1609
437 Old Mammoth Road, Suite R
Mammoth Lakes, California 93546
Contact: Sandra Moberly, Planning Manager
Phone: (760) 934-8989 ext 251
Fax: (760) 937-8608
Email: smoberly@townofmammothlakes.ca.gov

Project Title: Town of Mammoth Lakes General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update (File Nos. GPA 15-002 and ZCA 15-002)

Lead Agency: The Town of Mammoth Lakes (Town) as Lead Agency under the California Environmental Quality Act (CEQA) will prepare a Draft Environmental Impact Report (EIR) for the Town's General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update Project (referred to herein as the "Project"). This Notice of Preparation (NOP) is being circulated to agencies, organizations and other interested parties to solicit input regarding the proposed scope of the EIR analysis.

Agencies: The Town requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the Project, in accordance with California Code of Regulations, Title 14, Section 15082(b). Any public agencies that respond to this NOP are requested, at a minimum, to:

1. State whether they are a responsible or trustee for the Project, explain why and note the Project elements subject to their regulatory authority.
2. Describe significant environmental issues, alternatives and mitigation measures which they would like to have addressed in the EIR.
3. Provide the name, address and phone number of the person serving as their point of contact for this environmental review process.

Organizations and Interested Parties: The Town requests your comments regarding the significant environmental issues, alternatives and mitigation measures you would like to see addressed in the EIR.

Project Description and Location: The Project includes the following General Plan Land Use Element Amendments focused on revisions to the development standards for the commercial areas:

1. Changing the allowable intensity of development within commercially designated and zoned areas to require a minimum of 0.75 FAR and allow up to 2.0 FAR and removal of units and rooms per acre, which would result in an increase of up to approximately 336 residential units, 467 rooms, and 152,533 square feet of commercial development compared with allowable development under the current regulations.

2. Revisions to the boundaries of commercially designated land in the Land Use Element to match current commercial zoning;

3. Changing Land Use Element policy and text associated with regulating population growth from a People At One Time (PAOT) approach to an impact assessment based approach; and,

4. Deleting Land Use Element Community Benefits Incentive Zoning (CBIZ) and modifying Transfer of Development Rights (TDR) policies.

The Town is also proposing Zoning Code Amendments associated with Item 1., above, regarding commercial development standards so that the Zoning Code is consistent with the General Plan.

In addition, the Town is proposing to adopt and implement a Mobility Element Update. The Mobility Element Update addresses the two key concepts that are a focus of the 2007 General Plan: the triple-bottom line, which is the community's social, economic, and natural capital, and "feet-first" transportation, which emphasizes and prioritizes non-motorized travel first, public transportation second, and vehicle last. The Mobility Element Update identifies a Complete Streets network, which includes physical improvements to the local and regional transportation systems. For example, proposed changes along Main Street (i.e., vacation of the frontage road), extensions of roadways (i.e., Tavern Road, Sierra Nevada Road, Callahan Way) and connections of streets (i.e., Thompsons Way, Shady Rest site, 7B Road, and USFS property). In addition, the Mobility Element Update identifies opportunities for new signals and roundabouts throughout Town.

As shown on Figure 1, the Project Area for the General Plan Land Use Element/Zoning Code Amendments relative to the FAR includes approximately 122 acres of commercially designated lands within the Town. Other components of the Project, the shift from a People At One Time (PAOT) to an Impacts Assessment approach, CBIZ and TDR, have Townwide implications and the Project Area is the land within the Urban Growth Boundary (UGB). The Planning Area for the Mobility Element Update is the Town's Municipal Boundary.

Environmental Impact Report: Given the conceptual and long-term nature of the Project, the EIR will be prepared as a Program EIR pursuant to Section 15168 of the CEQA Guidelines. Program EIRs contain less detail than typical project-level EIRs because the level of detail in the environmental analysis is reflective of the level of detail in the program description itself. As a Program EIR, certain impacts identified and mitigation measures recommended will be inherently limited in specificity due to the conceptual nature of projected development and the broad applicability of proposed policy changes. As such, subsequent more focused environmental review may take place as individual projects are proposed.

When subsequent environmental review is required, the Program EIR may be used to focus project-level review on only those significant impacts not adequately considered in the Program EIR, and, to incorporate relevant information and analysis by reference.

Potential Environmental Effects: The Town has prepared an Initial Study in accordance with Section 15063 of the CEQA Guidelines to determine if the Project would have significant effects on the environment, and to focus the analyses in the Draft EIR on those issues determined to have the potential for significant effects. As identified in the Initial Study, the environmental issues listed below will be addressed in the EIR. Based on the Initial Study, the EIR will include the following environmental issue areas:

- Aesthetics
- Air Quality
- Forestry Resources
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Land Use/Planning
- Noise
- Population/Housing
- Public Services (fire, police, school, parks, and libraries)
- Recreation
- Transportation/Traffic
- Utilities and Service Systems (wastewater, water, stormwater, and solid waste

Document Availability: The Notice of Preparation, Project Description, and Initial Study are available for review at the following locations:

Town of Mammoth Lakes
Community & Economic Development Department
437 Old Mammoth Road, Suite R
Mammoth Lakes, CA 93546

Mammoth Lakes Library
400 Sierra Park Rd
Mammoth Lakes, CA 93546

The documents are also available online on the Town's website at:
http://www.townofmammothlakes.ca.gov/

Responses and Comments: If you would like to submit written comments on the NOP, please send them to Sandra Moberly, Planning Manager, with the Town of Mammoth Lakes Community & Economic Development Department at the P.O. Box 1609 or by fax at (760) 934-8608. Please be specific in your statements describing your environmental concerns. As mandated by state law, the public review period for the NOP is to occur for at least 30 days. The public review period will occur from May 29, 2015 to June 29, 2015. Please submit your response at the earliest possible date, but ***not later than 5:00 p.m. on June 29, 2015***.

Public Scoping Meeting: In addition to the opportunity to provide written comments in response to this NOP, the Town will conduct a scoping meeting on **June 10, 2015** to solicit oral and written comments from agencies, organizations and interested parties regarding the scope and content of the EIR. At the meeting information regarding the EIR process, the Project, and future opportunities for public participation, will be presented.

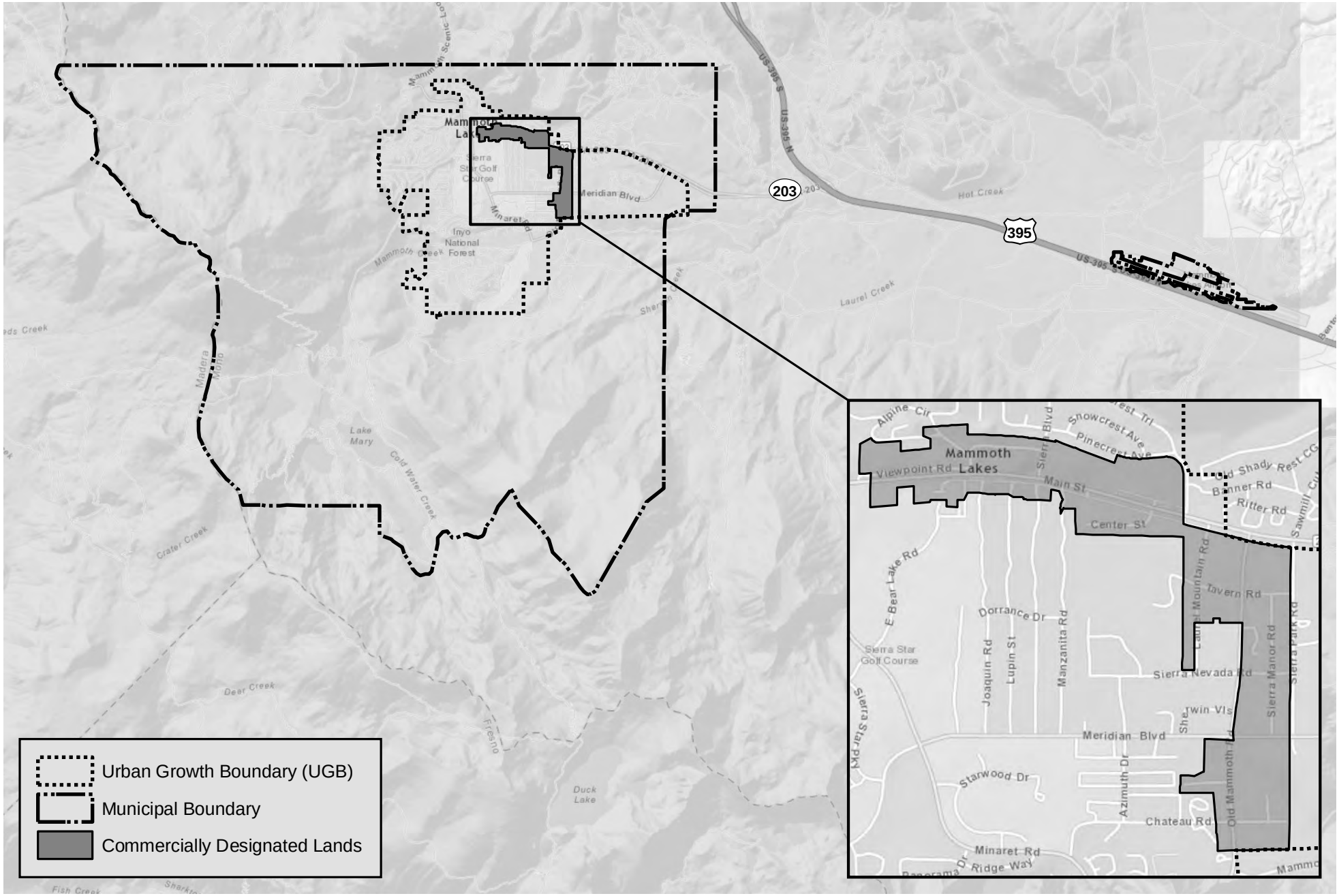
Time and Location of Scoping Meeting:

The Scoping Meeting will be held during the regularly scheduled Planning & and Economic Development Commission Meeting:

Wednesday, June 10, 2015, starting at 2:00 p.m.
Town Council Chambers
Minaret Village Shopping Center
437 Old Mammoth Road, Suite Z
Mammoth Lakes, CA 93546

For additional information, please contact Sandra Moberly, Planning Manager at: (760) 934-8989 ext. 251.

Signature: Sandra Moberly Date: 5.27.15



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Project Areas

Mammoth Lakes Zoning Code Update

Source: ESRI Street Map, 2009; PCR Services Corporation, 2015.

FIGURE

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ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Town of Mammoth Lakes General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update (File Nos. GPA 15-002 and ZCA 15-002)

2. **Lead agency name and address:** Town of Mammoth Lakes
   Community Development Department
   P.O. Box 1609
   Mammoth Lakes, California 93546

3. **Contact person and phone number:** Sandra Moberly, Planning Manager
   (760) 934-8989 ext. 251

4. **Project location:** The General Plan Land Use Element/Zoning Code Amendments would apply to the approximately 122 acres of commercially designated lands within the Town while the project area for the shift from a People At One Time (PAOT) approach to an impacts assessment approach applies to all land within the Urban Growth Boundary (UGB). The Planning Area for the Mobility Element Update is the same planning area as the General Plan. Please see Attachment A, *Project Description*, for more detail.

5. **Project sponsor's name and address:** Same as Lead Agency, above.

6. **General Plan designation:** All

7. **Zoning:** All

8. **Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**

   The Project includes the following General Plan Land Use Element Amendments focused on revisions to the development standards for the commercial areas:

   1. Changing the allowable intensity of development within commercially designated and zoned areas to require a minimum of 0.75 Floor Area Ratio (FAR) and allow up to 2.0 FAR and removal of the density limits based on units and rooms per acre, which would result in an increase of up to approximately 336 residential units, 467 rooms, and 152,533 square feet of commercial development compared with allowable development under the current regulations;
   2. Revisions to the boundaries of commercially designated land in the Land Use Element to match current commercial zoning boundaries in the Zoning Code;
   3. Changing Land Use Element policy and text associated with regulating population growth from a People At One Time (PAOT) approach to an impact assessment based approach; and,
   4. Deleting Land Use Element Community Benefits Incentive Zoning (CBIZ) and modifying Transfer of Development Rights (TDR) policies.

   The Town is also proposing Zoning Code Amendments associated with Item 1., above, regarding commercial development standards so that the General Plan and Zoning Code are consistent.

   In addition, the Town is proposing to adopt and implement a Mobility Element Update. The Mobility Element Update addresses the two key concepts that are a focus of the 2007 General Plan: the triple-bottom line, which is the community's social, economic, and natural capital, and "feet-first" transportation, which emphasizes and prioritizes non-motorized travel first, public transportation second, and vehicle last. The Mobility Element Update identifies a Complete Streets network, which

includes physical improvements to the local and regional transportation systems. For example, proposed changes along Main Street (i.e., vacation of the frontage road), extensions of roadways (i.e., Tavern Road, Sierra Nevada Road, Callahan Way) and connections of streets (i.e., Thompsons Way, Shady Rest site, 7B Road, and USFS property). In addition, the Mobility Element Update identifies opportunities for new signals and roundabouts throughout Town.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The Town's Municipal Boundary encompasses approximately 24 square miles; however, all but approximately four (4) square miles of this, defined by the Town's Urban Growth Boundary (UGB), are public lands administered by the United States Department of Agriculture Forest Service, Inyo National Forest (USFS).

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

The agencies with jurisdiction over the facilities discussed in the proposed General Plan Land Use Element/ Zoning Code Amendments and the Mobility Element Update are the Town of Mammoth Lakes, the United States Forest Service (USFS), and Caltrans. Other agencies with jurisdiction over individual components of the plans may include, but are not limited to: California Department of Fish and Game, United States Fish and Wildlife Service, Lahontan Regional Water Quality Control Board, and the Great Basin Unified Air Pollution Control District.

PURPOSE OF THE INITIAL STUDY

The proposed Town of Mammoth Lakes General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update are analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the Project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the Town of Mammoth Lakes. The Town of Mammoth Lakes is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project.

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" as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

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 proposed project MAY have a "potentially 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 adequately 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.

Sandra Moberly 5·27·15

Signature Date

Sandra Moberly, Planning Manager

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) 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.

2) A list of "Supporting Information Sources" should be attached, and other sources used or individuals contacted should be cited in the discussion.

3) Impact Columns Heading Definitions:

   - "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.

   - "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.

   - "Less Than Significant Impact" applies where the project creates no significant impacts, only Less Than Significant impacts.

   - "No Impact" applies where a project does not create an impact in that category. 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 proposed (e.g., the project falls outside of 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).

4) Earlier analyses 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:

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

   - 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.

   - 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.

5) 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.

6) The explanation 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.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
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?	☒	☐	☐	☐
II. AGRICULTURE AND FORESTRY 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 of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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 1220(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?	☐	☐	☐	☒

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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:				
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?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or 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, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☒	☐	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native 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?	☒	☐	☐	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐
VI. GEOLOGY AND SOILS – Would the project:				
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 the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
VII. GREENHOUSE GAS EMISSIONS – Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	☒	☐	☐	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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 a 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?	☐	☐	☒	☐
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
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?	☐	☐	☒	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐
X. LAND USE AND PLANNING – Would the project:				
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) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☒	☐	☐	☐
XI. MINERAL RESOURCES – Would the project:				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, 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?	☐	☐	☒	☐
XIII. POPULATION AND HOUSING – Would the project:				
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 replacement housing elsewhere?	☒	☐	☐	☐
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, 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:				
Fire protection?	☒	☐	☐	☐
Police protection?	☒	☐	☐	☐
Schools?	☒	☐	☐	☐
Parks?	☒	☐	☐	☐
Other public facilities?	☒	☐	☐	☐
XV. RECREATION				
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?	☒	☐	☐	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
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 intersections) 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??	☒	☐	☐	☐
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed 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 expansion of existing facilities, the construction of 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 needed?	☒	☐	☐	☐

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 the provider's 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 and regulations related to solid waste?	☒	☐	☐	☐
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☒	☐	☐	☐

ATTACHMENT A - PROJECT DESCRIPTION

INTRODUCTION

The Town of Mammoth Lakes (Town) is proposing the following General Plan Land Use Element Amendments focused on revisions to the development standards for the commercial areas:

1. Changing the allowable intensity of development within commercially designated and zoned areas to require a minimum 0.75 FAR and allow up to 2.0 FAR and removal of units and rooms per acre;

2. Revisions to the boundaries of commercially designated land in the Land Use Element to match current commercial zoning;

3. Changing Land Use Element policy and text associated with regulating population growth from a People At One Time (PAOT) approach to an impact assessment based approach; and,

4. Deleting Land Use Element Community Benefits Incentive Zoning (CBIZ) and modifying Transfer of Development Rights (TDR) policies.

The Town is also proposing Zoning Code Amendments associated with Item 1., above, regarding commercial development standards so that the Zoning Code is consistent with the General Plan.

In addition, the Town is proposing to adopt and implement a Mobility Element Update. The Mobility Element Update addresses the two key concepts that are a focus of the 2007 General Plan: the triple-bottom line, which is the community's social, economic, and natural capital, and "feet-first" transportation, which emphasizes and prioritizes non-motorized travel first, public transportation second, and vehicle last.

Collectively, for purposes of CEQA, the Land Use Element and Zoning Code Amendments and the Mobility Element Update, reflect the Project.

A. REGIONAL SETTING AND PROJECT AREAS

The Town of Mammoth Lakes, a mountain resort community, is located in southwestern Mono County (see **Figure 1**, *Regional and Project Vicinity Map*). The Town is situated in California's Eastern Sierra region and is located approximately 300 miles north of Los Angeles, 170 miles south of Reno, Nevada and 35 air miles southeast of Yosemite Valley. Neighboring counties include: Alpine County to the north, Inyo County to the south, Fresno County to the southwest and Madera County to the west.

The Town's Municipal Boundary encompasses approximately 24 square miles; however, all but approximately four (4) square miles of this, defined by the Town's Urban Growth Boundary (UGB), are public

lands administered by the United States Department of Agriculture Forest Service, Inyo National Forest (USFS).[1]

Land Use Element and Zoning Code Amendments

The specific Project Areas for the Land Use Element and Zoning Code Amendments, as numbered above, are described below:

1. and 2. The Project Area for the allowable intensity of development within commercially designated and zoned areas consists of approximately 122 acres designated in the General Plan as Commercial 1 (C-1) and Commercial 2 (C-2) within the UGB (see **Figure 2**, *Project Area for Land Use Element and Zoning Code Amendments*). These areas are zoned Mixed Lodging Residential (MLR), Downtown (D), and Old Mammoth Road (OMR). The C-1 and C-2 areas are located generally along Main Street and Old Mammoth Road. The portion of the Project Area along Main Street (State Route 203) extends from the Town's boundary on the east to an area just east of Minaret Road. The portion of the Project Area along Old Mammoth Road extends from SR 203 to just south of Chateau Road.

3. The Project Area for the shift from a People At One Time (PAOT) approach to an Impacts Assessment approach is the land within the UGB.

4. The Project Area relative to the General Plan amendments regarding CBIZ and TDR is the commercial lands within the UGB.

Mobility Element Update

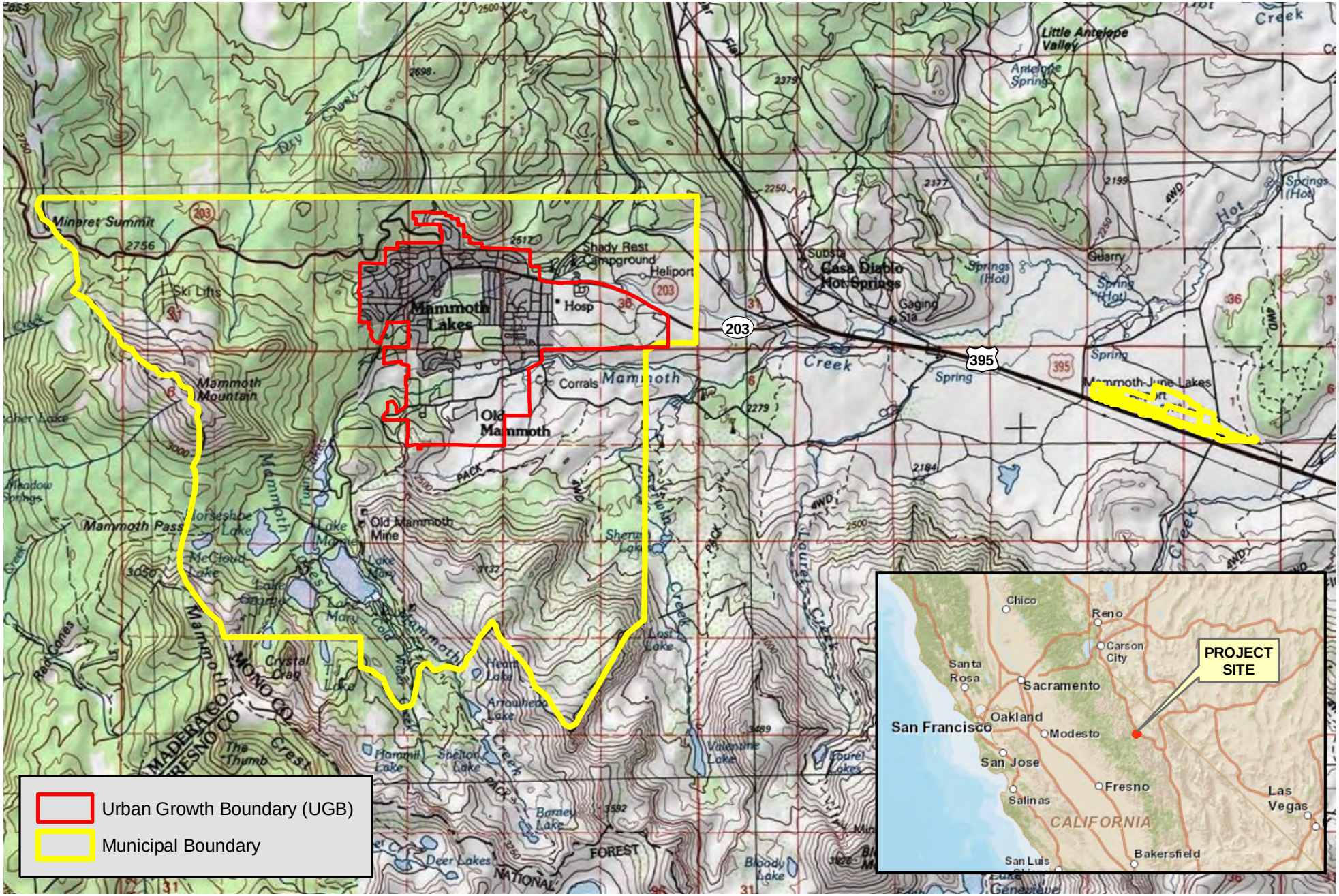
The Planning Area for the Mobility Element Update is shown in Figure 1 and is the same as the area for the General Plan. Regional access to the Town is provided via U.S. Highway 395, a state scenic highway which lies approximately three miles west of town. U.S. Highway 395 is the major surface transportation corridor in the Eastern Sierra region and primary inter-regional route connecting systems across four states. The Town is served primarily by State Route 203, which connects U.S. Highway 395 to the Town. State Route 203 traverses the developed part of town ending at Minaret Vista, west of the Mammoth Mountain Ski Area (MMSA). Air access to the Town is also available through the Mammoth Yosemite airport.

B. BACKGROUND

2007 General Plan

A general plan is a state-required document (Government Code Section 65300) that consists of a statement of development policies for development of a particular city or county (e.g., the Town of Mammoth Lakes). The General Plan expresses the Town's vision for its future and guides both long-term and day-to-day Town actions and decisions. The General Plan guides the level and type of development of land and infrastructure

[1] *The UGB is split into two non-contiguous areas. The primary UGB surrounds the Town's residential and commercial development and has an area of 4.0 square miles. Another UGB surrounds the airport and has an area of 0.3 square miles. Areas for all boundaries were calculated using the Town's GIS database.*



- PRELIMINARY WORKING DRAFT -

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Regional and Project Vicinity Map

FIGURE 1

Mammoth Lakes Zoning Code Update

Source: USGS Topographic Series (Bloody Mountain, Convict Lake, Crestview, Crystal Crag, Dexter Canyon, Mammoth Mountain, Old Mammoth, Toms Place, Watterson Canyon, Whitmore Hot Springs, CA); PCR Services Corporation, 2014.

- PRELIMINARY WORKING DRAFT -

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N

0 1,200 2,400 Feet

Project Area for Land Use Element and Zoning Code Amendments

Mammoth Lakes Zoning Code Update

Source: Microsoft (Aerial), 2010; PCR Services Corporation, 2015.

FIGURE

2

that will achieve the Town's physical, economic, social, and environmental goals. The General Plan consists of individual sections, or "elements," that address specific areas of concern, and also embody a comprehensive and integrated planning approach for the jurisdiction.

The Town of Mammoth Lakes completed a comprehensive update of the General Plan in 2007. The General Plan includes goals, policies, and actions relative to land uses and transportation within the Municipal Planning Area and more specifically within the UGB. As indicated above, the C-1 and C-2 land use designations constitute the Land Use Element and Zoning Code Amendments Project Area and are located generally along Main Street and Old Mammoth Road. The C-1 designation allows medium-scale, commercial mixed uses. The base density for residential uses is six (6) dwelling units to a maximum of 12 dwelling units per acre and a maximum of 40 hotel rooms per acre. Policy L.5.G of the 2007 General Plan allows an increase in density in the C-1 and C-2 Designations to no more than twice the maximum hotel room density, for hotel, motel, and similar transient lodging projects that specifically enhance the tourism, community, and environmental objectives of the Town. Thus, Policy L.5.G allows a maximum of 80 hotel rooms per acre with the provision of amenities, services, and/or environmental benefits above and beyond those required to meet the incremental demands of the project. The C-1 area is intended to create a transition zone to the more intensive C-2 and North Village areas. The C-2 designation allows for medium- and large-scale commercial mixed uses. The density of development is the same as in the C-1 area. Intended uses include retail and office space for services as well as visitor lodging and residential uses.

2014 Zoning Code Update

The Town's Zoning Code is the tool used to implement the General Plan. The Town updated the Zoning Code to be consistent with the 2007 General Plan pursuant to State law, which requires consistency between the General Plan and the Zoning Code. Town Council initiated the Zoning Code Update (ZCU) with the goal of incorporating the 2007 General Plan into the Zoning Code, promoting sustainability in town, promoting quality and design, as well as cleaning up and modernizing the Town's zoning regulations in an effort to provide a streamlined and user-friendly set of standards that would clearly establish the type of permitted development (and permit process) while supporting the Community Vision set forth in the 2007 General Plan.[2]

During the course of the ZCU, a proposal was made to regulate the intensity of development in the two commercially designated areas in the Town by using only a floor area ratio (FAR) approach, rather than continuing the use of a limitation on units or rooms per acre.[3] FAR is the relationship of the building square footage to the lot area. The purpose of using FAR is to allow greater flexibility within a development. The ZCU adopted by the Town Council in May 2014 allows for a 2.5 FAR in C-1 and C-2 designated areas, and retains the rooms/units per acre limitation in the MLR, D, and OMR districts.

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[2] *The 2007 General Plan establishes the following Community Vision: "Surrounded by uniquely spectacular scenery and diverse four-season recreational opportunities, the community of Mammoth Lakes is committed to providing the very highest quality of life for our residents and the highest quality of experience for our visitors." The General Plan provides seven items on which Mammoth Lakes provides a high value in order to achieve this Community Vision. The seven items address, sustainability; being a great place to live and work; provision of adequate housing; being a premier, year-round resort; protecting the natural environment; design and development that complements the mountain setting; provision of transportation options (p. 7 of the 2007 General Plan).*

[3] *The General Plan envisioned the use of a FAR as it states in the C-1 and C-2 descriptions: "A minimum floor area ratio and amount of commercial uses will be established in the Zoning Code."*

FAR Analysis

As indicated above, the Town's Zoning Code, consistent with the General Plan, currently allows an FAR of 2.5 with a limit of 12 residential units per acre and 40 lodging rooms per acre in C-1 and C-2 designated areas, and in the MLR, D, and OMR zoning districts. However, during the course of the ZCU, a proposal was made to use FAR alone to regulate the intensity of development in areas designated C-1 and C-2 in the General Plan. Thus, the Town undertook an FAR analysis in order to evaluate buildout in these areas with an FAR only limitation.

The methodology used to determine potential buildout using FAR with no unit or room cap required four steps: 1) conduct a land use inventory; 2) identify opportunity sites; 3) determine potential future use; 4) calculate potential buildout based on a set of assumptions developed with input from research conducted with architects, developers, and other jurisdictions, and review of Town documents.

First, a land use inventory was conducted of the C-1 and C-2 designated lands to identify parcels where development would likely occur within the timeframe of the General Plan. Next, potential future uses and buildout potential for these parcels was determined, including commercial square footage, number of dwelling units, and number of hotel rooms. A technical memorandum, further describing research and assumptions used to develop buildout potential is provided as Attachment A.

The FAR analysis was an iterative process that began with an assumed FAR of 2.5. After reviewing various iterations of potential buildout using a 2.5 FAR, comparing the numbers with other Town projections, and gaining input from the Town's traffic consultant, it was determined that a 2.5 FAR would result in significantly higher than anticipated buildout projections that were not considered appropriate or feasible for the Town. Accordingly, a determination was made to evaluate a lower FAR of 2.0.

The findings of the FAR analysis indicated that a 2.0 FAR could result in an increase in residential density within the MLR, D, and OMR zoning districts if development were to occur to the maximum allowable FAR. The findings of the FAR analysis with regard to lodging were that the 2.0 FAR could result in development that would be within the maximum intensity of 80 rooms per acres, assuming the provision of community benefits, which is allowed by the current regulations. Previously commercial (i.e., retail, service or office) development was limited by setbacks, heights, lot coverage, etc.. Consistent with current assumptions for buildout in the Town and with existing levels of development, the average commercial development is assumed to have an FAR of about 0.25. Thus, the 2.0 FAR could result in a potential increase in commercial floor area within the MLR, D, and OMR districts.

The conclusions of the study were that the change to a maximum of 2.0 FAR with no cap on the density of units or rooms could result in an increase in the potential buildout that could occur within the Project Area. More specifically, an increase in the residential density (i.e., residential units per acre), could occur compared with the allowable development under the current regulations, which are based on the maximum number of units or rooms per acre.[4] In addition, commercial square footage, including retail, service, and office floor area, would be greater than under the current regulations. Based on the conclusions of the study,

[4] *Given the Town's direction to shift to an impacts approach, as discussed below, the change in the development standards are not equated with population (transient and/or non-transient).*

the Town elected to pursue adoption of a FAR only limitation on commercial development with a 2.0 FAR, along with associated environmental review. The Town also elected to add a minimum FAR requirement of 0.75 FAR.[5]

People At One Time (PAOT)/Impact Assessment Policies

Given the nature of the Town as a mountain resort community, there is a permanent population as well as a seasonal population. Historically, the approach to assess and limit growth developed by the Town has been based on a "People At One Time" or PAOT concept. PAOT was established to describe population intensity and is a unique approach for regulating growth based on the Town's specific characteristics. Accordingly, Policy L.1.A of the General Plan states: *"Limit total peak population of permanent and seasonal residents and visitors to 52,000 people."*

In April 2009 the Town Council adopted the PAOT/Impact Assessment Policies, which included direction to *"(s)hift from PAOT based project evaluation to impact-based evaluation and mitigation."* This shift to monitor growth through evaluation of the potential impacts of a project relative to the quality of life and the environment rather than to focus on a particular number of people that could result from development was based on limitations and difficulties associated with calculating and monitoring PAOT. Under the proposed approach, rather than using the Town's PAOT model, which assumes 2.4 persons per permanent resident and 4.0 persons per transient unit, potential impacts would be assessed on a project-by-project basis through use of Project Impact Evaluation Criteria (PIEC) and/or environmental review, including but not limited to evaluations of air quality, including vehicle miles travelled (VMT); biological resources; cultural resources; geology and soils; hazards; hydrology; land use; noise; public services and utilities, including water demand; and transportation. An impacts-based approach is intended to help ensure that growth in the Town would not exceed the carrying capacity of infrastructure or other constraints, such as VMT and water supply, and that the potential for significant environmental impacts will be identified and mitigated to the extent feasible.

The proposed Land Use Element Amendments remove the PAOT related policy in order to move forward with the impact-based assessment rather than PAOT to monitor the Town's growth.

Community Benefits Incentive Zoning

Policy L.3.F. of the 2007 General Plan states: "*Ensure appropriate community benefits are provided through district planning and development projects*." More specifically relative to the C-1 and C-2 designations, Policy L.5.G. of the General Plan allows a doubling of density for hotel, motel, and similar transient lodging projects. In 2009 the Town Council adopted Resolution 09-55, the Community Benefits/Incentive Zoning policy (CBIZ policy), which was intended to be a "bridge" between the General Plan and the District Planning work. Specifically, the CBIZ policy includes the following language:

[5] *For purposes of the environmental analysis the maximum FAR is generally used to ensure the evaluation of a worst case analysis. For example, the maximum FAR would result in greater development and therefore, the greatest number of trips as well as the greatest amount of noise. In the case of aesthetics the minimum FAR coupled with other development regulations, such as build to lines and setbacks, would serve to affect the visual character.*

> *This Community Benefits Incentive Zoning policy is intended as a "bridge" framework, to be applied to all pending project applications and plan documents until the Town has completed Community Planning documents and codified them. Once codified, the Town will have substantially established land use and development policies (including clearly specified limits on height and density) that implement the Town of Mammoth Lakes General Plan.*

CBIZ has been used to allow an increase in density or height, or exceptions to setback requirements. If the density cap is removed and there is no limitation on density, CBIZ would not be necessary for density increases. In October 2014, the Town Council eliminated the CBIZ policy adopted by Resolution 09-55. Therefore, the Land Use Element Amendments propose the deletion of Policy L.5.G., which pertains to the C-1 and C-2 designations, from the General Plan.

Transfer of Development Rights

Action L.3.H.1. of the General Plan indicates that the Town should prepare a transfer of development rights ordinance. The FAR regulatory approach would eliminate the density limitations within the Commercial Zones which would mean that density would lose value, as there would be no density maximums in the Commercial Zones**.** Therefore, the Town's Land Use Element Amendments propose a modification to Policy L.3.H and the deletion of Action L.3.H.1.

Mobility Element Update

The 2007 General Plan includes a Mobility Element as required under state law.[6] However, after the adoption of the General Plan, the Town determined that an update of the Mobility Element was necessary. The primary purpose of the Mobility Element Update is to achieve the overarching goals of the General Plan with respect to the triple-bottom-line, which is the community's social, economic, and natural capital, and "feet-first" transportation strategies, which emphasizes and prioritizes non-motorized travel first, public transportation second, and vehicle last.

The Mobility Element is closely correlated with and supports the goals and policies of the General Plan Land Use Element. The Mobility Element provides the general location and extent of existing and proposed major thoroughfares, transportation routes, and other local transportation facilities in accordance with Government Code Section 65302(b). Government Code Sections 65302(b)(2)(A) and (B) require the Mobility Element to plan for a balanced, multimodal transportation network that meets the needs of all users of street, roads, and highways. "All users" by definition in the statute is "bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors." This requirement was established as part of Assembly Bill 1358, which is referred to as the California Complete Streets Act, as well as Caltrans Deputy Directive DD-64-R1, Complete Streets: Integrating the Transportation System.

While the Draft Mobility Element was completed in October 2011, the Town did not adopt the Mobility Element Update due to lack of funding for CEQA analysis. In 2013 the Town conducted a study along Main Street as a result of a decision to transform its Main Street corridor from an auto-dominated state highway

[6] *Government Code §65302(b) uses the term "circulation element", but the Town's Mobility Element is intended to, and does, function as a circulation element.*

that passes through town into a pedestrian oriented boulevard with downtown character. In February 2014 the Town accepted the Main Street Plan, which envisions specific changes along Main Street, including an increase in the intensity of development and the removal of the frontage roads. Properties along Main Street are designated C-1 and C-2 and therefore would be affected by the changes discussed above regarding the development standards and the use of an FAR without density caps. Therefore, the Mobility Element Update was revised to reflect the Main Street Plan.

C. EXISTING CONDITIONS WITHIN THE PROJECT AREAS

The Project Area for the Land Use Element and Zoning Code Amendments comprises the C-1 and C-2 designated properties and the entire Planning Area for the Town is the Project Area for the Mobility Element Update. Conditions in these Project Areas are discussed below.

Land Use Element and Zoning Code Amendments Project Area

The C-1 and C-2 designated lands comprise approximately 122 acres located primarily along SR 203/Main Street and Old Mammoth Road. Figure 2 shows the Project Area and the area's relationship to other Town planning study areas (i.e., District Plans and Main Street Plan). The properties designated C-1, which include approximately 33 acres of land, are located along Main Street between the North Village District and Mono Street. The C-2 designation, which includes approximately 89 acres of land, is located primarily along Old Mammoth Road with a small area around the intersection of Old Mammoth Road and Main Street.

As discussed previously, the C-1 designation allows medium-scale, commercial mixed uses. The base density for residential uses is six (6) dwelling units to a maximum of 12 dwelling units per acre and a maximum of 80 hotel rooms per acre.[7] The C-1 area is a transitional zone between the more intensive C-2 and North Village areas. The C-2 designation allows for medium- and large-scale commercial mixed uses. The density of development is the same as in the C-1 area. Intended uses include retail and office space for services as well as visitor lodging and residential uses.

As discussed above and shown in **Figure 3**, *Zoning Districts*, there are three commercial zoning districts associated with the C-1 and C-2 designations: MLR, D, and OMR. Generally, the MLR district corresponds to the C-1 designation while the D and OMR generally correspond to the C-2 designation. There are approximately 26 acres of land zoned MLR, approximately 45 acres zoned D, and approximately 51 acres zoned OMR.

The lands zoned MLR, D, and OMR are currently developed with a mix of residential units, lodging, and commercial services for residents and visitors to the Town. There are a few scattered vacant parcels. The existing uses include retail, restaurants, cinema, equipment rental, storage, laundromat, gas stations, banks, pet supplies, offices, residences, churches, day care, visitor accommodations, and some construction related

[7] *As indicated above, the density within the Commercial Land Use Designations is a base of 40 rooms per acre with the potential for double density pursuant to General Plan Policy L.5.G.*

uses. Based on Town data, there are approximately 757 residential units,[8] approximately 537 lodging units,[9] and approximately 1,046,978 square feet of commercial floor area within the Project Area.[10]

Main Street serves as the east-west thoroughfare through the Town. Currently, there is a frontage road that parallels both the north and south sides of Main Street, which creates a large setback for the businesses from the roadway. Angled parking is provided in pockets along portions of the frontage road. There are areas with slopes where the properties on the north side of Main Street sit above the road and areas on the south side that sit below Main Street. There is no sidewalk along Main Street or the frontage road. (The Town Council recently accepted the Main Street Plan, which identifies changes to the Main Street corridor, which are incorporated into the Mobility Element Update that is discussed below.)

Old Mammoth Road runs north-south and intersects with Main Street to form the primary entrance for visitors into the Town. This area is primarily developed with commercial strip malls geared to the automobile with large surface parking lots on most parcels fronting the roadway and the buildings set back from the streets. Residential development is intermixed with commercial development and is primarily multi-family with a mix of large complexes and smaller 6- and 8-unit buildings. The buildings are low scale, generally one to two stories in height. Sidewalks are provided on both sides of the street.

Mobility Element Update Project Area

As an element of the Town's General Plan, the planning area for the Mobility Element Update is consistent with the planning area established for the General Plan, which is shown in Figure 1. While the Mobility Element focuses on the transportation system within the Town's UGB, connectivity to areas outside of the UGB, including adjacent public lands and other regional transportation system is also considered.

D. DESCRIPTION OF THE PROJECT

The project consists of several amendments to the General Plan Land Use Element and to the Zoning Code to change the allowable intensity of development within commercially designated areas to allow up to 2.0 FAR and to remove units and rooms per acre development standards. The project also includes revisions to the boundaries of commercially designated land in the Land Use Element to match current commercial zoning districts. In addition, the project includes changing Land Use Element policy and text associated with regulating population growth through a People At One Time (PAOT) approach to an impact assessment based approach, deleting Policy L.3.F. related to community benefits, and modifying Transfer of Development Rights (TDR) policies. Finally, the project includes the adoption of the Mobility Element Update. The components of each of these changes is discussed below.

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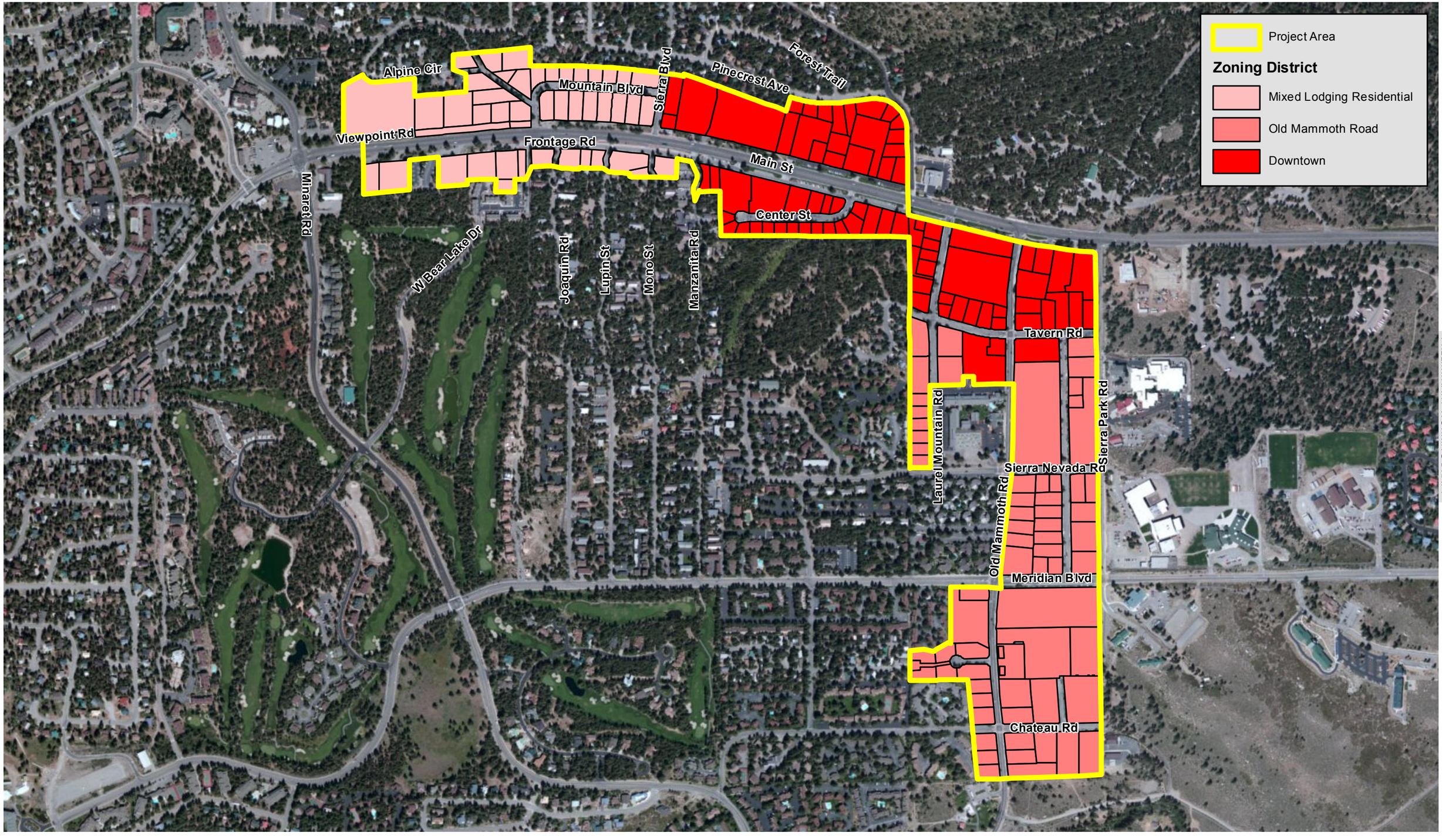
[8] *Residential units – Includes condos, apartments, etc. This category includes all projects that were built according to the 12 units / acre requirement.*

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

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



- PRELIMINARY WORKING DRAFT -

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Zoning Districts

Mammoth Lakes Zoning Code Update
Source: Microsoft, 2010 (Aerial); PCR Services Corporation, 2014.

FIGURE
3

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The intent of the proposed Land Use Element and Zoning Code Amendments as well as the Mobility Element Update is to achieve a sustainable and integrated system of land use and transportation in the Town of Mammoth Lakes. More specifically, the changes in the development standards and Mobility Element Update are to:

- Create flexibility through the creation of a "white box" established by development parameters, which focuses on the overall size of a structure;
- Streamline the planning process to encourage economic development;
- Cluster greater density in the downtown area to reduce vehicle miles travelled;
- Create a park-once downtown area in which people park their vehicles once and walk throughout the area thereby reducing congestion and vehicle miles travelled; and
- Create a vibrant and walkable downtown area

Land Use Element Amendments

The following section describes the General Plan Land Use Element amendments associated with the change in the commercial development standards, revisions to the boundaries of commercial designated land, change in the PAOT approach to and impacts assessment approach, and associated changes regarding CBIZ and TDR policies.

FAR and Removal of Room and Unit Cap

The General Plan Land Use Element establishes the distribution and intensity of land use within the Town. The proposed amendments would not change the land use designations or the location of the types of development within the Town. The proposed amendments modify the intensity of development that could occur in the C-1 and C-2 designated areas. The amendments would allow up to a 2.0 FAR and would remove the units and rooms per acre development standard. Therefore, the use of FAR coupled with setbacks, maximum building heights, parking, and snow storage requirements established in the Zoning Code would establish the maximum building envelope in which the uses could be contained. The proposed change to a FAR with no room or unit cap would provide greater flexibility.

With the correction to the Land Use map discussed below, approximately 29 acres of land would be designated C-1 and approximately 93 acres of land would be designated C-2. As indicated in **Table 1**, *Acreage in the Project Area Within Commercial Zoning Districts By Category*, the commercial zoning districts contain approximately 29 acres zoned MLR; approximately 41 acres zoned D; and approximately 50 acres zoned OMR.

For purposes of the environmental analysis, it is assumed that approximately 95 acres or about 78 percent of the land area within the MLR, D, and OMR zoning districts would not be expected to change. No additional units or substantial square footage is expected on this acreage because of one of the following factors: the

Table 1

Acreage in the Project Area Within Commercial Zoning Districts By Category

District	Vacant	Intensify/Redevelop	No Change/Approved	Totals
MLR	1.5	3.0	25.4	29.9
D	4.5	15.6	21.2	41.3
OMR	2.3	0.5	48.0	50.8
Totals	***8.3***	***19.1***	***94.6***	***122.0***

Frontage Road associated with Vacant or Intensify/Redevelop Lands: 2.6 acres (0.9 acres on the north side of Main Street and 1.7 acres on the south side of Main Street). Therefore, an additional 2.6 acres of land is assumed available for development.

Source: PCR Services Corporation, 2014

age and characteristics of the existing development, an existing development approval, historical trends of development, or economic analysis of development that could be absorbed in the area.[11]

As shown in Table 1, there are approximately eight (8) acres of vacant land within the Project Area, all of which would be assumed to develop. Approximately 19 acres within the Project Area would likely intensify or redevelop. Of the approximately 122 acres within the Study Area, approximately 27 acres, or 22 percent of the land, would be subject to development, redevelopment, or intensification.

In February 2014 the Town accepted the Main Street Plan, which envisions specific changes along Main Street, including an increase in the intensity of development and the vacation of the frontage road. The purpose of the Main Street Plan is to transform the Main Street corridor from an auto-dominated state highway into a pedestrian-first street. A portion of the area evaluated in the Main Street Plan is located within the Project Area. There are approximately 2.6 acres of land within the frontage road associated with properties that could develop, redevelop, or intensify. Of the approximately 2.6 acres, approximately 0.9 acres would be located on the north side of Main Street and approximately 1.7 acres would be located on the south side of Main Street. Because additional development could occur as a result of the vacation of the frontage road, approximately half of the acreage, or 1.3 acres, was assumed available for mixed-use development.

Table 2, *Comparison of Buildout Under Current Regulations and 2.0 FAR*, compares the buildout that could occur in the Project Area under the existing regulations and buildout with a 2.0 FAR. Based on the FAR Analysis, the potential buildout using an FAR only approach could result in an increase in intensity of uses within the MLR, D, and OMR zoning districts compared with the buildout that could occur in the MLR, D, and OMR zoning districts under the current regulations. The 2.0 FAR could result in an estimated 76 rooms per acre for lodging and approximately 43 to 46 residential units per acre.

[11] *Mammoth Lakes Economic Forecast and Revitalization Strategies, Economic & Planning Systems, Inc., October 2011.*

Table 2

Comparison of Buildout Under Current Regulations and 2.0 FAR
(MLR, D, and OMR Zoning Districts)

	Buildout – Current Regulations	Buildout – 2.0 FAR	Change in Buildout Potential (Current Regs vs. 2.0 FAR)[a]
Commercial (Square Feet)	53,136 square feet[b]	483,154 square feet	+ 430,018 square feet
Lodging (Rooms)	524 to 1,048 rooms[c]	951 rooms	+427 to -97 rooms
Residential (Units)	117 units[d]	430 units	+ 313 units
Vacation of Frontage Road[e]		28,957 square feet 40 rooms 23 units	

[a] *These numbers are the difference between development that could occur under current regulations minus development that could occur with a 2.0 FAR. This does not provide a net number, which would be deducting the existing square footage.*

[b] *The Zoning Code currently allows 2.5 FAR in the commercial districts with a limit on the number of rooms or residential units. While under the current regulations a project could develop 2.5 FAR of commercial floor area, for purposes of this comparison a 0.25 FAR is used as that relates to the level of development assumed in the Town's traffic model.*

[c] *Assumes 40 to 80 rooms/acre; 40 rooms/acre is the base allowable intensity, with up to 80 rooms/acre allowed with the provision of community benefits.*

[d] *Assumes 12 units/acre.*

[e] *Assumes that one-half of the acreage associated with parcels that may develop, redevelop, or intensity could also develop. For analysis purposes this assumes that an additional 1.3 acres of land would be available for mixed use development as a result of the vacation of the frontage road. The projections assume that 25% of the square footage would be commercial uses and the 75% would be split between residential and lodging.*

Source: PCR Services Corporation, 2014

Table 3, *Summary of Proposed Land Use Changes within the Commercial Designations*, summarizes the changes that could occur from the proposed change within commercially designated areas to allow up to 2.0 FAR including the removal of units and rooms per acre development standards.

The 2.0 FAR could result in an increase in intensity within the Downtown area. With the current regulations that require ground floor commercial space along certain streets, the area would likely be more mixed-use in nature. The increase in intensity and requirement for mixed-use development within the Project Area would likely concentrate the development in a smaller geographic area. This in turn could help to create a more pedestrian-focused environment and would support the park-once approach in the downtown area.

The proposed General Plan amendments would modify the description of the C-1 and C-2 designations to reflect the minimum 0.75 FAR and maximum 2.0 FAR and to remove the density/intensity cap. The following shows the proposed amendments in strikethrough/underline:[12]

Commercial 1 (C-1) The C-1 designation allows medium-scale, commercial mixed uses. ~~The base density for residential is six (6) to a maximum of twelve (12) residential dwelling units per acre and a maximum of forty (40) hotel rooms per acre.~~ The minimum floor area ratio is 0.75 and the maximum floor area ratio is

[12] *Strikethrough/underline is used to show the deleted and new text. The text shown in ~~strikethrough~~ is text to be deleted and the text shown in underline is new text.*

Table 3

Summary of Proposed Land Use Changes within the Commercial Designations

	Residential Units	Lodging Units	Commercial Floor Area
Existing	757 units[a]	537 rooms[b]	1,046,978 square feet[c]
Proposed 2.0 FAR Net Increase	+379 units[d]	+920 rooms[e]	+341,377 square feet[f]
Projected Buildout with 2.0 FAR (Existing + 2.0 FAR Buildout)	*1,136 units*	*1,457 rooms*	*1,388,355 square feet*
Current Regulations Net Increase	43 units[g]	453 to 977 rooms[h]	78,844 square feet[i]
Projected Buildout Under Current Regulations (Existing + Current Regulations Buildout)	*800 units*	*990 to 1,514 rooms*	*1,235,822 square feet*
Net Change (Buildout with 2.0 FAR – Buildout Under Current Regulations)	**+336 units**	**+467 room to -57 rooms**	**+152,533 square feet**

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

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

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

[d] *This is a net number which is the projected units minus existing units (430 projected units – 74 existing units = 356 net residential units). In addition, this includes the 23 residential units that could be developed as a result of the additional developable land from the vacation of the Main Street frontage road (356 net units + 23 units = 379 units).*

[e] *This is a net number which is the projected rooms minus existing rooms (951 projected rooms – 71 existing rooms = 880 net rooms). In addition, this includes the 40 rooms that could occur as a result of the additional developable land from the vacation of the Main Street frontage road (880 net rooms + 40 rooms = 920 rooms).*

[f] *This is a net number which is the projected square footage minus existing square footage (483,154 square feet – 170,734 square feet = 312,420 square feet). (This assumes that the existing square footage on parcels that would intensify would remain.) In addition, this includes 28,957 square feet that could occur as a result of the additional developable land from the vacation of the Main Street frontage road (312,420 net square feet + 28,957 square feet = 341,377 square feet).*

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

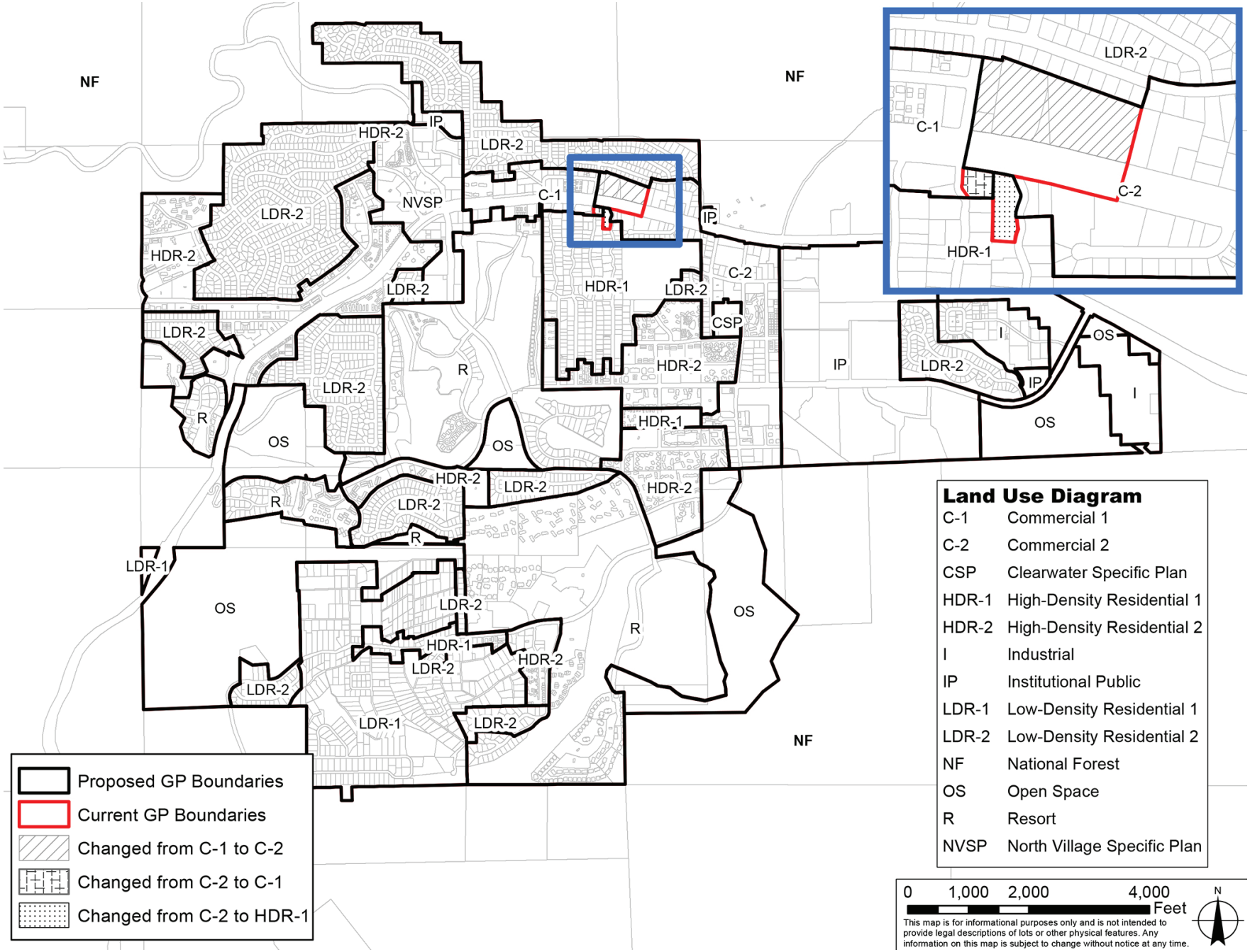
[h] *This is a net number which is the projected rooms under current regulations (80 rooms/acre) minus existing rooms (524 to 1,048 projected rooms – 71 existing rooms = 453 to 977 net rooms).*

[i] *This assumes 0.25 FAR on vacant parcels that are considered for mixed use (7.24 acres, as remaining 1.01 acres are assumed to develop with residential use only). In addition, this assumes the existing non-residential square footage would be replaced at the same intensity as existing and assumes no increase of commercial square footage on parcels identified for intensification under the 2.0 FAR scenario.*

Source: Town of Mammoth Lakes and PCR Services Corporation, 2014

2.0. This designation is located along Main Street between the North Village district and Mono Street, and is intended to create a transition zone to the more intensive Commercial 2 and North Village designation. ~~A minimum floor area ratios and amount of commercial uses will be established in the Zoning Code.~~

Commercial 2 (C-2) This designation allows for the community's medium- and large-scale commercial uses. ~~The base density for residential is six (6) to a maximum of twelve (12) residential dwelling units per acre and a maximum of forty (40) hotel rooms per acre.~~ The minimum floor area ratio is 0.75 and the maximum floor area ratio is 2.0. Intended uses include retail and office space for services as well as visitor lodging and



- PRELIMINARY WORKING DRAFT -

PCR

Proposed Revisions to the Land Use Diagram

Mammoth Lakes Zoning Code Update

Source: Town of Mammoth Lakes, 2014.

FIGURE 4

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residential uses. ~~A minimum floor area ratio and amount of commercial uses will be established in the Zoning Code.~~

Land Use Diagram Amendment

Figure 4, *Proposed Revisions to the Land Use Diagram*, shows the changes to the Land Use Diagram to correct boundaries of the C-1, C-2 and HDR-1 designations to match the associated zoning. With the correction to the Land Use map, approximately 29 acres of land would be designated C-1 and approximately 93 acres of land would be designated C-2.

People At One Time Amendment

The project includes an amendment to Policy L.1.A, which limits the PAOT to 52,000 people. Given that the Town has determined that an impacts-based assessment approach would be more meaningful to ensure that the projected and proposed growth do not exceed the Town's carrying capacity, the policy would be amended as follows:

L.1.A. Policy: ~~Limit total peak population of permanent and seasonal residents and visitors to 52,000 people.~~ Utilize Project Impact Evaluation Criteria (PIEC) to evaluate the relationship between growth, density, and population to ensure the balance of economic, social, and environmental factors so as to ensure that development does not exceed the carrying capacity of the Town.

Community Benefits Incentive Zoning Amendment

CBIZ has been used to allow an increase in density or height, or exceptions to setback requirements. With the removal of the density cap, CBIZ would not be necessary for density increases. Therefore, the Town's General Plan amendments propose a deletion of Policy L.5.G. from the General Plan as follows:

~~L.5.G. Policy: In the C-1 and C-2 Designations, density may be increased to no more than twice the density for hotel, motel, and similar transient lodging projects that specifically enhance the tourism, community, and environmental objectives of the Town. This enhancement must be through the provision of amenities, services, and/or environmental benefits above and beyond those required to meet the incremental demands of the project. These amenities, services, and environmental benefits include, but are not limited to those listed under "Community Character" on page 24 of this General Plan. Any such increase shall further the Community Vision, shall be consistent with the discussion of "Build-out" on page 37 of this General Plan, shall be consistent with approved District Plans, and shall be subject to such rules, processes, and findings as may be adopted by the Town Council in its sole discretion.~~

Transfer Development Rights Amendment

Action L.3.H.1. of the General Plan indicates that the Town should prepare a transfer of development rights ordinance. The FAR regulatory approach would eliminate the density limitations within the Commercial Zones which would mean that density would lose value as there would be no density maximums in the Commercial Zones. Therefore, the Town's General Plan amendments propose a modification to Policy L.3.H and the deletion of Action L.3.H.1 as follows:

L.3.H. Policy: Density may be clustered or transferred within clearly articulated ~~district,~~ master and~~,~~ specific plans to enhance General Plan goals and policies. ~~Development rights may also be transferred between districts when that transfer furthers protection of identified environmentally sensitive areas.~~

~~L.3.H.1. Action: Prepare a transfer of development rights ordinance describing the methods and findings for approving such density transfers.~~

Other Amendments

As a result of the proposed amendments discussed above, cleanup of other portions of the General Plan would be necessary. In addition to the amendments discussed above, the discussion regarding buildout in the General Plan (p. 37 of the General Plan) would need to be revised to remove reference to the PAOT.

Appendix A: Action Table and Appendix E: Useful Terms for Understanding the General Plan would be revised to reflect the changes. For example, the definitions for Community Benefit and PAOT would be deleted. In addition, the term and definition for Floor Area Ratio would be added.

Zoning Code Amendments

The proposed Zoning Code Amendments revise the allowable FAR in the MLR, D, and OMR zoning districts to reflect the 2.0 FAR that was determined to provide an appropriate level of development through the FAR Analysis. In addition, the Zoning Code Amendments would remove the unit and room cap that is currently specified in the code. No change is proposed to other development standards, such as setbacks, height, parking, and areas for snow removal. Thus, Section 17.24.010, Purpose, of the Zoning Code would be revised as follows:

Downtown District (D). Downtown (D) District is intended to provide a thriving mix of residential, non-residential, and lodging uses and a distinctive gateway entry into town, with a focus on ground-level commercial uses and active frontages. The development standards are intended to concentrate development along Main Street with a focus on shop front buildings that frame the street and provide an animated, pedestrian-friendly environment with high visual quality. The minimum floor area ratio is 0.75 and the maximum FAR is ~~2.5~~2.0. ~~Lodging development has a maximum density of 80 rooms/acre. Residential development has a maximum density of 12 units/acre.~~ The D zoning district is consistent with the Commercial 2 (C-2) land use designation of the General Plan.

Old Mammoth Road (OMR). The Old Mammoth Road (OMR) District is intended as an arts and culture district oriented toward medium scale commercial development along Old Mammoth Road, emphasizing community serving retail, artist galleries, office and service uses. It is intended to encourage a mix and intensity of uses in a pedestrian-scaled environment at a scale and form that is appropriate to its neighborhood context and adjacent residential uses and forms. The minimum floor area ratio is 0.75 and the maximum FAR is ~~2.5~~2.0. ~~Lodging development has a maximum density of 80 rooms/acre. Residential development has a maximum density of 12 units/acre.~~ The OMR zoning district is consistent with the Commercial 2 (C-2) land use designation of the General Plan.

Mixed Lodging/Residential (MLR) District. The Mixed Lodging/Residential (MLR) District is intended to allow one or more of a variety of lodging, residential, and non-residential uses to encourage a mix of uses and emphasize transient occupancy. The minimum floor area ratio is 0.75 and the maximum FAR is ~~2.5~~2.0. ~~Lodging development has a maximum density of 80 rooms/acre. Residential development has a maximum density of 12 units/acre.~~ The MLR zoning district is consistent with the Commercial 1 (C-1) land use designation of the General Plan.

In addition, text would be added to Section 17.24.010 to clarify that while a maximum 2.0 FAR would be allowed, there are other development standards that must be met on a parcel. The 2.0 is considered a maximum allowable FAR and is not "by right" and may not be achieved on all parcels given site constraints and compliance with other standards. The proposed addition to the Zoning Code is as follows:

A. The permissible Floor Area Ratio (FAR) for a particular project or parcel will be affected by applicable design requirements; height, setback, snow storage, parking, and stepback requirements; and other development and dimensional standards. Accordingly, the maximum theoretically possible FAR is not achievable in some instances. Nothing in this Zoning Code or in the Town's General Plan waives any design requirement or excuses compliance therewith, or entitles any applicant, project, or parcel to receive the maximum theoretically possible FAR.

Mobility Element Update

The Mobility Element is a component of the General Plan and guides the Town's investment and decision-making for transportation and accessibility improvements to the Town's system of roads, sidewalks, paths, bike lanes, trails, parking, and public transit. The Mobility Element Update establishes the Town's goals, policies, and actions necessary to achieve a progressive and comprehensive multimodal transportation system that serves the needs of residents, employees, and visitors in a way that is connected, accessible, and safe.

The Mobility Element Update involved research on emerging and practical transportation and land use principles, coordination with agencies that have jurisdiction within the defined planning area and immediate surrounding area (i.e., California Department of Transportation and Inyo National Forest (U.S. Forest Service) as well as other stakeholders, such as the Great Basin Unified Air Pollution Control District (GBUAPDC), Eastern Sierra Transit Authority (ESTA), United States Forest Service (USFS), Mammoth Mountain Ski Area (MMSA), and Mono County Local Transportation Commission (MCLTC). In addition, public participation played an important role in the development of the Mobility Element Update. Broad-based public outreach and community engagement was conducted to solicit feedback and input from the public about mobility issues and needs and to discuss potential solutions and priorities. Participation from all sectors of the community, including permanent residents, visitors, second home-owners, and other agencies and organizations, was encouraged. The Town provided a series of transportation-specific input opportunities, including two workshops, one all day open house, two "roadshow" trolley tours of the major transportation corridors, and an internet-based survey.

The framework of the Mobility Element Update reflects two key concepts that are a focus of the General Plan:

- The Triple-Bottom-Line – The community's social, economic, and natural capital, and

- "Feet-first" Transportation – emphasizes and prioritizes non-motorized travel first, public transportation second, and vehicle last.

The following are principles that guide the Mobility Element and help achieve the overarching goals of the General Plan:

- Complete streets: Serve all users and all abilities through bicycle, pedestrian, and vehicle infrastructure;
- Safety: A safe and accessible system is fundamental;
- Environment: Improve air quality, water quality and slow climate change;
- Management: Transportation infrastructure is an expensive and limited resource;
- Context-sensitive design: Design follows function, character, and environment;
- Public spaces and places: Streets are an important part of "place-making";
- Community health: Improving transportation improves health;
- Affordability: Integration of housing and transportation planning can influence affordability; and
- Economy: Efficient transportation supports a strong economy.

The Mobility Element Update provides the framework for the Town's existing and future multimodal transportation system. The future multimodal transportation system will be progressive and comprehensive and will serve the various needs of residents, employees, and visitors in a way that is connected, accessible uncongested, and safe. The Mobility Element Update provides detailed guidance for each mode of transportation, including pedestrian, bicycle, transit, and vehicle. The Mobility Element Update is divided into sections addressing each mode of transportation. Each section includes a series of goals, policies, and actions that establish the framework necessary to address transportation needs and to make positive progress toward creating a sustainable and attractive transportation system consistent with the general Plans triple-bottom-line and feet-first concepts.

The Complete Streets section of the Element synthesizes all components of the transportation system and recognizes that streets must provide appropriate infrastructure for pedestrian, bicycle, and vehicle uses. Additionally, complete streets provide unique public spaces and the opportunity to enhance the character and quality of life in the Town. The Mobility Element recognizes that increasing the overall capacity of the system, by emphasizing improvements that reduce vehicle trips and focus on feet-first travel will be necessary.

The Mobility Element Update contains goals, policies, and action items for each of the following sections:

- Complete Streets
- Vehicle
- Pedestrian
- Bicycle
- Transit

- Parking
- Travel Demand Management
- Regional and Interregional Transportation

To carry out its primary objectives, the Mobility Element Update identifies the following improvements to the local and regional transportation systems:

- Main Street Reconfiguration – The Main Street Plan includes the vacation of the frontage roads and conversion to a four-lane cross-section with a center median and turn pockets. Implementation would likely be phased. Preliminary phases to provide basic infrastructure and pedestrian access would be constructed by the Town with major capital works being driven by new development on Main Street.
- USFS Property Connections – Provides connections within the USFS lands on the north side of Main Street. These connections would provide improved connectivity on the north side of Main Street and would be considered with potential future USFS development plans.
- Thompsons Way – Creates a new north-south street connection between Main Street and the Sierra Nevada Road Extension, parallel to Sierra Park Road that would provide access to the new courthouse, Mammoth Hospital , schools, and future civic center development.
- Tavern Road Extension – Extends Tavern Road to the east, which connects to Thompsons Way. The extension would primarily serve Mammoth Hospital and potential future development of the Civic Center parcel south of the new courthouse.
- Sierra Nevada Road Extension – Extends Sierra Nevada Road to the east to connect to the new Thompsons Way. This connection would create an additional east-west connection parallel to Meridian Boulevard near the schools and hospital.
- Shady Rest Site Connections – Provides connections within the Shady Rest Site between Center Street, Tavern Road, Dorrance Drive, and Chapparal Road/Arrowhead Drive. These connections would improve east-west and north-south connectivity in the center of town and would likely occur with development of the Shady Rest Site.
- Callahan Way Extension – Extends Callahan Way south to Dorrance Drive. This connection would provide improved access to Main Street from the Sierra Valley neighborhood and would likely occur with development of Sierra Star (Lodestar).
- 7B Road (Sierra Star Connector) – Connects Minaret Road to East Bear Lake Drive as well as to Main Street. This connection would provide required access to the future (approved) Mammoth Crossing and Tanavista projects as well as to Sierra Star (Lodestar). This connection would also provide enhanced emergency access to the Holiday Haus (approved) and the Chutes properties. This connection would likely occur with development of Sierra Star and Mammoth Crossing.

The Mobility Element Update identifies opportunities for new signals and roundabouts throughout Town. The location and implementation of these facilities will be carefully evaluated for public benefit and cost effectiveness as a traffic management facility.

E. ANTICIPATED PROJECT APPROVALS

The Town of Mammoth Lakes is the lead agency under CEQA for the General Plan and Zoning Code Amendments as well as the adoption of the Mobility Element Update. The Mammoth Lakes Town Council will have final discretion over the General Plan and Zoning Code Amendments as well as the Mobility Element through adoption of these documents. No other approvals would be required.

ATTACHMENT B - EXPLANATION OF CHECKLIST DETERMINATIONS

For purposes of this Initial Study, the General Plan Land Use Element/Zoning Code Amendments and the Mobility Element Update are collectively referred to as the "Project," unless stated otherwise.

I. AESTHETICS

Would the project:

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

Potentially Significant Impact. The proposed Land Use Element/Zoning Code Amendments regarding floor area ratio (FAR) would require a minimum 0.75 FAR and allow a maximum 2.0 FAR within the Town's approximately 122-acres of commercially designated lands. Building heights would not exceed the Municipal Code's existing maximum building heights of 55 feet in the Downtown (D) zone, 45 feet in the Old Mammoth Road (OMR), and 45 feet for lots of less than 10 percent gradient and 55 feet for lots of greater than 10 percent gradient in the Mixed Use Lodging Residential (MLR) zoning district. However, the changes relative to FAR and removal of the density/intensity cap would result in taller buildings than the one-and two-story development currently characterizing the Town. In addition, the proposed Mobility Element Update would change the relative location of buildings along Main Street, which are now separated from Main Street by diagonal parking and an approximately 24-foot-wide frontage road. Under the Mobility Element Update, which reflects the Town of Mammoth Lakes Main Street Plan,[1] the frontage road and diagonal parking would be vacated, which would allow for buildings to be located approximately 35 feet closer to Main Street. The location of buildings closer to Main Street has the potential to narrow the view corridor of Sherwin Range and Mammoth Mountain and affect panoramic views that are currently visible from this area. In order to evaluate the potential effects of these changes on panoramic views, this issue will be evaluated further in an EIR.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

Potentially Significant Impact. Streets within the Town of Mammoth Lakes commercial districts are not designated local scenic routes and the Town's commercial districts are not visible from the State Highway 395 Scenic Highway corridor. However, several potential landmarks and other sites of interest along Main Street have aesthetic value to the Town. The potential increase in the intensity of development within the Town's commercial districts, and the placement of buildings closer to the edge of Main Street would affect the appearance of the Town, as viewed from adjacent local streets and sidewalks and from higher areas with views of the commercial districts. In addition, the Main Street reconfiguration under the Mobility Element Update would include the conversion to a four-lane roadway cross section with a center median, which would alter the appearance of the street and would, thus, affect the visual character of the Town. This issue will be evaluated in an EIR in order to address the effects of the Project on scenic resources and visual character.

[1] *Town of Mammoth Lakes, Main Street Plan, pages 38 and 39, February 2014.*

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

Potentially Significant Impact. The Project could result in a change in the intensity of development within the commercial districts as well as a change in building location along Main Street. As such, the aesthetics evaluation will focus on visual quality and potential changes in the form of development that could result within the commercial districts and within a highly visible area of the Town. Therefore, the EIR will evaluate visual changes as a result of the changes to the roadway and the form of development.

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

Potentially Significant Impact. The Project would require a minimum 0.75 FAR and would allow a maximum 2.0 FAR within the commercial districts, which would allow for the potential development of approximately 483,154 square feet of commercial floor area, compared to 53,136 square feet under the current General Plan buildout. This has the potential to increase commercial activity beyond that anticipated under the General Plan and could generate greater commercial lighting, including sign lighting, and general light spillage along the street fronts, which would result in an increase in ambient light and glare. In addition, the vacation of the frontage road and location of buildings closer to the Main Street right-of-way would potentially cause shading along the sidewalk, particularly at the north side of the buildings. Shading effects would be of greatest concern during the winter months because of the potential presence of ice. Because potential development could increase ambient light, cause glare, or increase shading, the extent of potential lighting and shade impacts will be evaluated further in an EIR.

II. AGRICULTURE AND FORESTRY 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 of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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 the existing zoning for agricultural use, or a Williamson Act Contract?

No Impact (a-b). There are no prime or unique farmlands or other agricultural operations within the Town's Urban Growth Boundary. In addition, there are no areas designated for agricultural uses within the Project areas. Therefore, the Project would not conflict with the existing zoning for an agricultural use or a Williamson Act Contract. Thus, no impact would occur in these regards. Further analysis of this issue is not necessary in an EIR.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(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?

Potentially Significant Impact (c-d). The Land Use Element/Zoning Code Amendments relative to commercial development would occur within the Town's UGB and no impacts to forest land would occur. However, the Mobility Element Update could result in a proposed roadway on Forest Service lands on the north side of Main Street. Therefore, a potentially significant impact could occur relative to the Mobility Element Update. This issue will be evaluated further in an EIR.

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?

No Impact. As discussed in Response No. II (a-b), above, the Project would not result in a conversion of farmland to a non-agricultural use. Therefore, no impact would occur relative to the conversion of Farmland to non-agricultural use and no further analysis of this issue is necessary in an EIR.

III. AIR QUALITY

Where available, the significance criteria established by the Great Basin Unified Air Pollution Control District (GBUAPCD) or air quality management plan may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the AQMP or Congestion Management 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 that exceed quantitative thresholds for ozone precursors)?

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact (a-d). The Town of Mammoth Lakes is located in the Great Basin Valleys Air Basin (GBVAB). On November 6, 2013, the Town Council adopted an updated Air Quality Management Plan (AQMP) or Air Quality Maintenance Plan and PM_{10} Redesignation Request. This was subsequently approved by the Great Basin Unified Air Pollution Control District on May 5, 2014. An update to Municipal Code Chapter 8.30, Particulate Emissions Regulations, was also included in this effort. The Town's Municipal Code Section 80.30.100 contains a 179,708 peak VMT on any given day on the roadway segments evaluated by LSC (the Town's traffic consultant) in the Mammoth Lakes Vehicle Miles Traveled Analysis.

The Project would result in an increase the intensity of development within the commercials districts and would also involve changes in the transportation network. The changes in the intensity of development and the pattern of traffic as well as the construction of new roadways identified in the Mobility Element Update could increase vehicle miles travelled, air pollution emissions and exposure of air pollutants to sensitive receptors. Due to the potential for significant short- and long-term local and regional air emission impacts, a full analysis of air quality impacts will be provided within an EIR.

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

Less Than Significant Impact. During construction activities associated with the modifications to existing roadways and construction of new roadways, various diesel-powered vehicles and equipment could create minor odors. These odors are not likely to be noticeable beyond the immediate vicinity and would be temporary and short-lived in nature. Therefore, construction odor impacts would be less than significant. Long-term odors are typically associated with industrial projects involving use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves no elements related to these types of uses. Therefore, less than significant long-term odor impacts would occur with Project implementation. Further analysis of this issue is not necessary in an EIR.

IV BIOLOGICAL RESOURCES

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a 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 the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

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

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with 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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

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?

Potentially Significant Impact (a-f). The Project would result in the disturbance of previously undisturbed land with the development of vacant properties within the commercial districts (i.e., approximately 8 acres scattered throughout the commercial districts) and for the new roadways identified in the Mobility Element

Update (please see Figure 5 of the Project Description). A variety of biological resources are known to exist in portions of the Project Areas. These resources include: natural communities such as conifer forest and great basin sagebrush scrub; special status wildlife species such as northern goshawk (*Accipiter gentilis*), greater sage grouse (*Centrocerus urophasianus*) and Sierra Nevada red fox (*Vulpes vulpes necator*), as well as many more common wildlife species; and, special status plants such as smooth saltbush (*Atriplex pusilla*), Long Vallry milkvetch (*Astralagus johannis-howellii*) and Father Crowley's lupine (*Lupinus padre-crowleyi*), as well as many common species. Thus, development of vacant lands in the commercial districts and the construction of the proposed roadways identified in the Mobility Element Update may have the potential to impact sensitive species and habitats, and could interfere with wildlife corridors and wildlife nursery sites. Furthermore, the Project may conflict with one or more of the local policies or ordinances protecting biological resources in the Town's Resource Management and Conservation Element or Municipal Code. As there may be potentially significant impacts associated with these issues, further analysis of biological resources will be included in an EIR.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

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

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

Potentially Significant Impact (a-d). The Project Areas have been occupied by humans in historic times. As a result, archaeological resources may be present in vacant lands within the commercial districts (i.e., approximately 8 acres are currently vacant) or areas where new roadways are proposed in the Mobility Element Update. Some development within the commercial districts on currently vacant lands and the construction of proposed roadways would occur on existing undeveloped land, including areas that may contain archaeological resources or be proximate to historic resources. Additionally, development of the commercial lands and construction of new roadways could disturb paleontological resources or disturb human remains. Accordingly, due to the potential for significant impacts on historic, archaeological and paleontological resources, the EIR will include further analysis of these issues.

VI. GEOLOGY AND SOILS

Would the project:

a. Exposure of 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?

Less Than Significant Impact (a i-ii). The Mono Lake Long Valley region is part of one of the most active seismic regions in the U.S. Seismic activity in the vicinity of the Town is a result of continuing tectonic movement along the eastern front of the Sierra Nevada Mountain Range. Three historically active faults located in proximity to the Town have the greatest potential to create significant ground shaking in the Town. These faults include the Hilton Creek fault (1980 earthquake), the Owens Valley fault (1972 earthquake) and the Chalfant Valley fractures (1986 earthquake). These three faults, as well as six other potentially active faults, have the potential for ground shaking within the Town. While these faults are within proximity to the Town, there are no known Alquist-Priolo Earthquake Fault Zones within the project areas. Damage due to surface rupturing is limited to the actual location of the fault line break, unlike damage from ground shaking, which can occur at great distances from the fault. According to the Town's General Plan EIR, the potential for surface rupture in the Town is considered to be low.[2]

In terms of new building development, the proposed Land Use Element/Zoning Code Amendments relative to FAR would apply within the Town's approximately 122-acres of commercially designated lands. The majority of land within the commercial districts is already developed. The Mobility Element Update would result in the extension of roadways and the creation of complete streets within the Town. The Project would not pose new geologic constraints or hazards. Any development within the Town, buildings or roadways, would be required to comply with the requirements of the California Building Code (CBSC) (CCRs, Title 24). The CBSC is based on the Uniform Building Code (UBC), which is used widely throughout United States (generally adopted on a state-by state or district-by-district basis), and has been modified for California conditions with numerous, more detailed and/or more stringent regulations. Built structures and/or facilities would be constructed in accordance with the requirements of the CBSC and the Town's Municipal Code Sections 12.08.076 (Grading and Clearing) and 12.08.080, which requires that grading may be conducted under the following permits within the limits of each: 1) a letter of exemption, for minimal work; 2) a building permit, allowing grading within the footprint and as needed for the foundation excavations; and 3) a grading permit, for all other conditions. Municipal Code Section 12.08.080 requires engineered plans and a soils report to be submitted with an application for a grading permit. Therefore, buildings and facilities would be designed in accordance with the ground motion parameters that have been calculated for a particular site to withstand seismic ground shaking from the maximum credible earthquake anticipated to occur at the particular project site, as necessary per applicable regulatory requirements. Thus, despite the seismically active area in which the Town is located, impacts associated with seismic ground shaking would be less than significant. Further analysis of this issue is not necessary in an EIR.

Based on geologic history, geotechnical hazards related to volcanic activity are possible in the project areas. Potential impacts to the Town include inundation by ash deposition, lava, or lahars, or complete destruction from a catastrophic eruption. A comprehensive daily monitoring program of activity along known faults helps scientists to assess the volcanic hazards in the Long Valley area and to recognize the early signs of possible eruptions. The USGS, in cooperation with the California Office of Emergency Services and local

[2] *Town of Mammoth Lakes Final General Plan EIR, Chapter, 4.4 - Geology, Seismicity, Soils, and Mineral Resources, May 2007.*

jurisdictions in eastern California, has established procedures to promptly alert the public to a possible eruption. In addition, the Town adopted an Emergency Operations Plan (EOP) in 2001, which is updated regularly. The projected increase in intensity of development within the commercial districts could result in a slight increase in the population in the Town. However, with the plans in place stated above, impacts regarding volcanic hazards are concluded to be less than significant. No further analysis of the issue is necessary.

With regards to carbondioxide, since carbon dioxide derived from molten rock is heavier than air, when it leaks from the soil it can collect in snow banks, depressions, and poorly ventilated enclosures, such as cabins and tents. The areas in which carbon dioxide occurs are outside the UGB and are within USFS jurisdiction. The occurrences are seasonal and USFS monitors the areas. The Project would not result in development within the USFS jurisdiction and therefore, impacts regarding carbon monoxide would be less than significant. No further analysis of the issue is necessary.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. As indicated in the Final Program EIR for the General Plan Update (2007), based on the character of surface and subsurface soil and depth to groundwater, there appears to be little potential for liquefaction in the Town. Within Mammoth Lakes, areas of alluvium and moraine material with shallow groundwater have the potential for liquefaction. Areas subject to liquefaction because of fine-grained alluvium are in the low areas including Sherwin Meadows, areas to the north and south of the Old Mammoth District, and to a lesser extent, an area of shallow groundwater near the Meridian Boulevard and Minaret Road. However, based on the character of surface and subsurface soil and depth to groundwater, there generally appears to be little potential for liquefaction in the Town. Regardless, any development that would occur as a result of the Project would be built in accordance with the applicable seismic requirements of the CBSC and Town of Mammoth Lakes Municipal Code requirements, as described above. Therefore, impacts associated with seismic-related ground failure, including liquefaction would be less than significant. Further analysis of this issue is not necessary in an EIR.

iv. Landslides?

Less Than Significant Impact. Landslides move under the force of gravity and are affected by the type of earth materials involved, the internal friction of the slide mass, and the slope over which the mass is moving. Triggering events for landslides include earthquakes, heavy precipitation, natural erosion and earthwork/grading. Landslides are limited primarily to areas with a combination of poorly consolidated material and slopes that exceed 30 percent. While slopes with these gradients are found in portions of Mammoth Knolls, Mammoth Slopes, and areas of Old Mammoth, there is no record of landslide activity in the Town. The proposed Land Use Element/Zoning Code Amendments would not alter the land uses within the commercial districts. As indicated above, any development, buildings or proposed roadways in the Mobility Element Update, would be required to comply with the CBSC and the Town of Mammoth Lakes Municipal Code requirements, as described above. Therefore, impacts relative to landslides would be less than significant and further analysis of this issue is not necessary in an EIR.

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

Less Than Significant Impact. The Town of Mammoth Lakes is underlain by a variety of rock types, including Pliocene to Recent volcanic pyroclastic deposits, Pleistocene glacial deposits and Holocene

alluvium (less than 10,000 years old). Soils are characterized as Frigid and Cyric, which are typically gravelly loams with low water capacity and generally developed on glacial outwash.[3] These soils may be sensitive to disturbances by development and have a moderate to high erosion potential, depending on the steepness of slopes. Construction activities associated with the development have the potential to result in minor soil erosion during site clearing, grading and excavation, which may contribute to subsequent siltation and conveyance of other pollutants into local streams and drainages. Section 12.08.078 of the Municipal Code regulates grading and earthwork for the purpose of minimizing disturbance from erosion and siltation. In addition, all construction projects must comply with the Lahontan Regional Water Quality Control Board's (LRWQCBs) Water Quality Control Plan to reduce soil erosion related to surface water runoff and siltation.[4] The Water Quality Control Plan sets forth control measures that reduce erosion that can occur during construction of road and private development projects. In accordance with the LRWQCB, certain construction projects, including road construction, would require a Storm Water Pollution Prevention Plan (SWPPP) with associated Best Management Practices (BMPs) to control erosion at the source. With the implementation of BMPs and SWPPP requirements, impacts to topsoil would be reduced to a less than significant level and further analysis of this issue in an EIR is not necessary.

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

Less Than Significant Impact. Potential impacts with respect to liquefaction and landslide potential were determined to be less than significant based on the analysis presented under Checklist Questions VI.a.iii and iv, above. Moraines (unconsolidated rock and soils resulting from glacial debris) can result in lateral spreading or collapse. However, moraine features in the middle of town are considered relatively stable unless they are underlain by shallow groundwater.[5] Excavation for subterranean structures (such as underground parking) would cause disturbance of existing soils and contribute to potential localized caving of excavated areas (e.g. the excavated side walls loosing stability). All required excavations would be sloped and properly shored in accordance with applicable provisions of the 2013 CBSC as incorporated into the Municipal Code. Where the proposed excavation is deeper than adjacent off-site buildings, it is recommended that shoring should be designed to resist the surcharge imposed by the adjacent building, as required under the CBSC. Construction of streets and sidewalks would comply with the design standards with respect to cut slopes, gradients, and other requirements pertinent to underlying geologic conditions, as approved by the Director of Public Works.[6] Other geologic hazards, such as seismically induced settlement and dynamic compaction of dry and loose soils may occur during a major earthquake. These hazards are also addressed through CBSC-compliant site preparation, foundation design, and road construction standards. With compliance with standard Town of Mammoth Lakes and CBSC requirements, impacts associated with lateral spreading, subsidence, or collapse would be less than significant and no further analysis of this topic in an EIR is necessary.

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3 *Town of Mammoth Lakes General Plan Environmental Impact Report, Chapter 4.4, page 4-96, May 2007.*

4 *California Regional Water Quality Control Board, Water Quality Control Plan for the Lahontan Region North and South Basins, Chapter 4.3, Stormwater Runoff, Erosion, and Sedimentation, 1995 (with Amendments through October 2014).*

5 *Town of Mammoth Lakes General Plan Environmental Impact Report, Chapter 4.4, page 4-97.*

6 *Town of Mammoth Lakes Department of Public Works, Town of Mammoth Lakes Standards, Section 100, Streets and Sidewalks, Subsection D., Road Design Standards, July 2013.*

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Town's General Plan EIR, no expansive soils have been mapped or encountered in the Town.[7] Any development that would occur as a result of the Project would be built in accordance with the applicable requirements of the CBSC and Town of Mammoth Lakes Municipal Code requirements, as described above. Therefore, impacts associated with expansive soils would be less than significant and further analysis of this issue is not necessary in an EIR.

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

Less Than Significant Impact. Development anticipated as a result of the Land Use Element/Zoning Code Amendments would occur in the commercial districts. These areas are already designated for development. In addition, sewer service is provided to this area of the Town and any new development would tie into the existing facilities. The Mobility Element Update contains policies relative to the transportation infrastructure in the Town. As such, the Project would not result in the use of septic tanks or alternative wastewater disposal systems. No impact would occur from the Project and no further analysis of this issue is necessary.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?

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

Potentially Significant Impact (a-b). The Project could result in an intensification of development in the commercial districts and in new roadways. While both of these components of the Project could result in more walkability and shorter vehicle routes, there is a potential for significant short- and long-term greenhouse gas emission impacts. Therefore, further analysis of greenhouse gas impacts will be provided in an EIR. In addition, the EIR will evaluate the Project's consistency with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases, such as Executive Orders S-3-05 and S-01-07, Assembly Bill 32, and the Town's Resource Management and Conservation Element of the General Plan.

[7] *Ibid.*

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials may be used during the construction phase of new development or for the proposed roadways identified in the Mobility Element Update. Hazardous materials that may be used during construction include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners and possibly herbicides and pesticides. Generally these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to compliance with applicable standards and regulations.

Over the long-term, the Project would not involve development that would include substantial storage, use, disposal, or generation of hazardous materials or wastes. The Land Use Element/Zoning Code Amendments would not result in a change in the uses allowed in the commercial districts. Routine maintenance activities associated with the Town's proposed roadways may involve the occasional use of hazardous materials. Potentially toxic or hazardous compounds associated with maintenance activities typically consist of readily available solvents, cleaning compounds, paint, herbicides, and pesticides. These compounds are regulated by stringent federal and state laws mandating the proper transport, use, and storage of hazardous materials in accordance with product labeling. The use and storage of these substances is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations.

Overall, the Project would not change the potential for hazards associated with the routine transport, use, or disposal of hazardous materials as the Town will continue to manage and regulate hazards and hazardous materials. Construction and operation of the Project would result in a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment. Further analysis of this issue is not necessary in an EIR.

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?

Less Than Significant Impact. The Land Use Element/Zoning Code Amendments would not result in changes in land use and therefore, would not include facilities or land uses typically associated with hazardous materials handling, storage, or use. The construction and use of proposed roadways would not result in the use of hazardous materials aside from those discussed in VIII.a., above. Further, existing federal, State and local regulations exist to ensure hazardous materials use, storage, and disposal associated with any proposed activities or facilities would not result in significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Given the limited use of hazardous materials associated with the Project, and

anticipated compliance with associated federal, State, and Town regulations and requirements, impacts related to the accidental release of hazardous materials would be less than significant. Further analysis of this issue is not necessary in an EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Land Use Element/Zoning Code Amendments would not result in changes in land use in the commercial districts and therefore would not change the uses within proximity of existing and future school sites. The construction and use of proposed roadways would not result in the use of hazardous materials aside from those discussed in VIII.a., above. Further, it is assumed that the limited use of hazardous materials that would occur would be carried out in conformance with manufacture guidelines and applicable federal, State and local regulations that exist to ensure hazardous materials use, storage, and disposal would not result in a significant hazard to the public or the environment, including exposure of school sites to hazardous materials or emissions. Accordingly, impacts related to the exposure of school sites to hazardous materials or emissions would be less than significant. Further analysis of this issue is not necessary in an EIR.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. No sites within the project areas have been included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5.[8] Accordingly, Project implementation would not be subject to existing hazards from such a site. No impact would occur in this regard. Further analysis of this issue is not necessary in an EIR.

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

No Impact. The Mammoth Yosemite Airport (MMH) is located to the east of the Town but within the Town's Urban Growth Boundary. The Mono County Airport Land Use Commission oversees development and land use compatibility issues. The Mammoth/June Lake Airport Land Use Plan (ALUP) establishes a comprehensive land use plan that defines the type and pattern of future development in the area surrounding the existing airport. The Land Use Element/Zoning Code Amendments would not change the uses or heights of buildings within the commercial districts. In addition, the Mobility Element Update would not result in changes to development located within an airport land use plan area or result in changes in roadways within proximity to the MMH. As such, no safety hazards for people residing or working in the area would occur as a result of the Project and no impact would occur. Further analysis of this issue is not necessary in an EIR.

[8] *California Environmental Protection Agency official website. Cortese List: Section 65962.5(a). http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm Accessed March 17, 2015.*

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

No Impact. There are no private airstrips in the vicinity of the project areas. Therefore, the Project would not result in airport-related safety hazards for the people residing or working in the area. No impact would occur in this regard. Further analysis of this issue is not necessary in an EIR.

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

Less Than Significant Impact. Development of buildings or roadways would be subject to compliance with emergency access standards and requirements specified by State Fire Code and the Town's Municipal Code, as well as the Town's General Plan, where appropriate. In addition, it is acknowledged that the Town has an adopted EOP for emergency response within the Town. The EOP sets forth the responsibilities, functions, and operations of the Town government and its interrelationship with other agencies and jurisdictions which provide services during an emergency. The EOP addresses earthquakes, volcanic activity, flooding, rapid snowmelt, fire, avalanches, landslides, transportation incidents, hazardous materials releases, medical emergencies, social unrest, terrorism, and war. The Plan meets the State's Standardized Emergency Management System (SEMS) and is updated regularly. Project implementation would 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 plan. In fact, the complete streets that would be implemented by the proposed roadways and the alternative transportation that is supported in the Mobility Element Update would increase access to areas for meeting and staging in an emergency event. The Mobility Element Update could have a beneficial impact regarding emergency access. Therefore, impacts regarding emergency response are considered to be less than significant. Further analysis of this issue is not necessary in an EIR.

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?

Less Than Significant Impact. The characteristics of the Town of Mammoth Lakes, including limited points of entry/exit and location near forested land present unique fire hazard problems. Wildfires can result in death, injury, economic loss, and heavy public investment in firefighting efforts. The proposed Land Use Element/Zoning Code Amendments would potentially allow intensification of development in the Town's commercial districts, which would potentially increase residential and visitor populations and, thus, expose more people to wildland fires. For this purpose, the Town of Mammoth Lakes maintains the EOP, which sets forth the responsibilities, functions, and operations of the Town government and its interrelationship with other agencies and jurisdictions to provide emergency services during such events as wildfires. In addition, the Eastern Sierra Fire Safety Council (ESRFSC) prepared a Fire Safety Plan to help residents improve defenses against wildfires. The ESRFSC is made up of private citizens and advised by the U.S. Forest Service (USFS), California Department of Forestry and Fire Protection (CDFFP), and the Bureau of Land Management (BLM). Fire hazard and risk are measured by the amount of fuel available to burn at any given time and the likelihood that an ignition would occur. The risk factors are used to provide a relative ranking of fire risk, hazard, and susceptibility to a large, severe fire. Fire hazard severity for Mammoth Lakes, which has been mapped by the CDFFP, is considered "very high." In response to this rating and the Sierra Nevada Forest Plan Amendment (SNFPA) (2004), USFS crews began the construction of the Mammoth Lakes Fuelbreak,

which is funded by the National Fire Plan (NFP) for the Inyo National Forest. The purpose of the fuel break is to protect the north end of Mammoth Lakes from fire and treat approximately 400 acres of urban interface (the 0.25-mile Defense Zone defined in the NFP). The fuel breaks are monitored annually by the USFS and may be re-mowed in five-year intervals. The ESRFSC also collaborates with local volunteer fire departments and assists CDFFP as they train fire prevention volunteers to perform residential fire hazard inspections. Volunteers also work with homeowners and businesses to raise awareness concerning wildland fire risks and methods of hazard reduction.

The Town's EOP, which meets the state's Standardized Emergency Management System (SEMS) requirements, provides emergency response procedures such as identification of critical hazard areas, locations for meeting and staging in an emergency event, communications, and emergency evacuation. In a disaster situation, the Town would provide an Emergency Operations Center (EOC) at 437 Old Mammoth Road, Suite Z. The EOC is fully equipped with emergency communication equipment and cooking, showering, and sleeping facilities. Other EOC's include the Mammoth Community Water District (MCWD) office, Fire Station 2, Police Department, Canyon Lodge, and other facilities. Radio and satellite communications would be utilized to maintain communications should other systems fail and local radio and television would be utilized to notify residents and visitors of an emergency.

The Mobility Element Update also provides for roadway improvements that would extend existing streets thereby improving mobility and connectivity throughout the Town. Improvements include connections to USFS property at the north side of Main Street, new north-south access via Thompsons Way, extension of Tavern Road to the east, extension of Sierra Nevada Road to the east, connections to the Shady Rest site and new signals, extension of Callahan Way to the south, and the extension of 7B (Sierra Star) to connect Minaret Road to East Bear Lake Drive and to Main Street. With improvements to the transportation system and the effective use of EOCs and other procedures set forth in the EOP and NFP, risk to the Town of Mammoth Lakes related to wildfires would be reduced to a less than significant level. Because the proposed Land Use Element/Zoning Code Amendments would not interfere with EOP and NFP procedures, they would not increase risk related to wildland fires. Therefore, the impact of the Project with respect to wildland fires would be less than significant and further evaluation of this issue in an EIR is not necessary.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

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

Less than Significant Impact. The Project consists of Land Use Element/Zoning Code Amendments and upgrades and extensions of the Town's street network through the General Plan's Mobility Element Update. Potential new development under the proposed Land Use Element/Zoning Code Amendments includes approximately 8.3 acres of vacant land and potential intensification of development on approximately 19.1 acres of land. Street improvements under the Mobility Element Update include consolidation of Main Street (vacation of frontage road, turn lanes, etc.), connections to USFS property at the north side of Main Street, new north-south access via Thompsons Way, extension of Tavern Road to the east, extension of Sierra Nevada Road to the east, connections to the Shady Rest site and new signals, extension of Callahan Way to the south, and the extension of 7B (Sierra Star) to connect Minaret Road to East Bear Lake Drive and to Main Street.

The construction of new roadway segments would increase paved surfaces thereby increasing impermeable surfaces throughout the Town. The development of existing vacant land in the Town's commercial districts would increase impervious surfaces in the approximately 122-acre area by approximately eight acres. The Land Use Element/Zoning Code amendments would not alter the overall pattern of development or change lands that are already anticipated for development. The Land Use Element/Zoning Code amendments would not substantially affect anticipated surface runoff. The increase in impermeable surfaces for roadways has the potential to increase the volume and velocity of surface runoff during a storm event. During construction, runoff from disturbed areas may contain silt and debris and potentially increase the sediment load in the storm drain system. As a result, water quality and the carrying capacity of the storm drain system could be impaired. Impacts during construction would vary depending on the level of construction activity and weather conditions. However, all construction projects would be subject to state and local water quality regulations, such as Section 12.08.078 of the Municipal Code, which regulates grading and earthwork for the purpose of minimizing disturbance from erosion and siltation. Additionally, grading and construction projects are required to comply with State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) permitting and BMP's. Roadway construction would be administered by the Town of Mammoth Lakes Department of Public Works and would comply with standards for surface water runoff and erosion control set forth in the Town of Mammoth Lakes Standards for roadway design and drainage facilities.[9] In addition, recommendations set forth in the Final Recommendations on Erosion, Drainage and Flooding Project would be applicable to all erosion and runoff control during road construction.[10] These documents set forth design standards and flood and erosion control measures, including BMPs that have successfully been deployed in alpine settings. In addition, all construction projects must comply with the Lahontan Regional Water Quality Control Board's (LRWQCB's) Water Quality Control Plan to reduce surface water runoff and siltation.[11] Where applicable, a Storm Water Pollution Prevention Plan (SWPPP) with associated Best Management Practices (BMPs) to control surface runoff at the source would be implemented. With the implementation of Municipal Code and SWPPP requirements, impacts related to water quality standards during construction would be reduced to a less than significant level.

During operation, any increase in motor vehicle activity associated with new streets and greater residential and commercial occupancy than currently anticipated under the General Plan could increase the discharge of pollutants from motor vehicles, such as petroleum hydrocarbons, glycol, and dissolved heavy metals. The LRWQCB reports that runoff from paved surfaces has increased the concentrations of nutrients, organic compounds, asphaltic concrete particles, and petroleum in Mammoth Creek. Motor vehicle activity is addressed in the proposed Mobility Element Update to emphasize "feet first" (non-motorized) transportation. The potential reduction or reduced growth in motor vehicle use would benefit water quality by reducing discharge pollutants from paved surfaces that currently enter Mammoth Creek and other water bodies in the area. In addition, all new road segments would install new surface water collection systems and drains which would channel water to the Murphy Gulch detention basin. Detention basins act as filters that reduce adverse runoff from storm events. This reduction is accomplished by decreasing the peak flow to downstream watersheds and/or by delaying the time at which downstream hydraulic systems are impacted. Such a delay allows a longer period for downstream watersheds to drain, effectively increasing

[9] *Town of Mammoth Lakes Department of Public Works, Standards, updated April 2014.*

[10] *Nichols Consulting Engineers, Chtd, for the Town of Mammoth Lakes Department of Public Works, Town of Mammoth Lakes Erosion, Drainage, and Flooding Project Final Recommendations Report, April 2008*

[11] *California Regional Water Quality Control Board, Water Quality Control Plan for the Lahontan Region North and South Basins, Chapter 4.3, 1995 (with amendments through October 2014).*

the ability of downstream drainage systems to accommodate runoff generated upstream. The combined effects of flow reduction and time delay are created by utilizing available storage volume in the basin and by designing the hydraulic outflow structures from the basin. Downstream benefits associated with the combined action of discharge reduction and time delay due to the presence of a detention basin may include lowering the water surface elevation in streams, hence decreasing the magnitude of risks, and reducing downstream damage associated with streambed erosion, sediment transport, or pollution transport.[12] The Town of Mammoth Lakes also requires that all new development retain on-site the runoff produced from a one-hour 20-year storm event. This reduces the downstream impact of new development, while reducing the sediment and nutrient material that is washed from roofs, roads, and other hard surfaces. Because construction runoff would be controlled by existing state and local regulations and required BMPs, and operational runoff would directed from the pavement to detention systems that reduce pollutants, the Project would not violate water discharge requirements at existing water bodies, such as Mammoth Creek. Impacts with respect to water quality standards would be less than significant and no further analysis of this issue in an EIR is necessary.

b. Substantially deplete groundwater supplies or interfere 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 land uses for which permits have been granted)?

Less Than Significant Impact. The MCWD provides domestic water to the Town from both surface water and groundwater from six distinct watersheds comprising the 45,000 acre (71-square-mile) Mammoth Hydrologic Basin. The primary source of water comes from surface water diverted from the Mammoth Creek watershed, plus eight groundwater production wells within the Town. The potential increase in intensity of development associated with the proposed Land Use Element/Zoning Code Amendments would not increase the amount of impervious surfaces in the Town's commercial districts compared to the existing General Plan, which had anticipated development of existing vacant sites. However, the Mobility Element Update anticipates the completion of several new roadways. New roadways would increase impervious surfaces compared to existing conditions. However, the new roadways would incorporate storm drain infrastructure. The collection of runoff would reduce groundwater recharge and divert more runoff into the Town's storm drainage system. Surface water runoff is managed under the Mammoth Lakes Storm Drain Master Plan (SDMP), which establishes a system of drains from Mammoth Slopes to the Mammoth Ranger Station via Canyon Boulevard, Bener Street, Alpine Circle, and Main Street. This system discharges into Murphy Gulch just west of the Mammoth Ranger Station and would re-enter the Mammoth Hydrologic Basin. Because of surface runoff from the new streets would eventually re-enter the basin and because of the relatively small percentage of new impermeable roadways, compared to the Mammoth Hydrologic Basin, the proposed Land Use Element/Zoning Code Amendments and Mobility Element Update would not substantially deplete groundwater supplies or interfere with groundwater recharge. Therefore, impacts related to groundwater recharge would be less than significant impact and no further analysis of this issue in an EIR is necessary.

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?

[12] *Town of Mammoth Lakes Storm Drain Master Plan, page 32, May 26, 2005.*

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

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

f. Otherwise substantially degrade water quality?

Less than Significant Impact (c-f). Less-than-significant impacts relative to water quality are discussed under IX.a, above. New road development or extensions of roadways under the Mobility Element Update would potentially result in an increase in collected surface runoff. Construction of streets would adhere to the Town Standards and other design policies that provide for the collection and diversion of surface runoff to the Town's system of storm drains. The storm drain system diverts runoff to the Town's detention basin, which, as discussed above, would substantially reduce potential damage associated with streambed erosion, sediment transport, and pollution transport. Control of surface runoff from new roads would not cause the area's drainage patterns to be altered. The proposed Land Use Element/Zoning Code Amendments would potentially result in intensified development along established streets within the Town's existing commercial districts, which comprises approximately 122 acres. However, development resulting in impervious surfaces was anticipated in the commercial districts under the existing General Plan and would not be substantially different as a result of the Land Use Element/Zoning Code amendments. Therefore, development under the Land Use Element/Zoning Code Amendments would not increase impervious surfaces or runoff compared to anticipated conditions. Moreover, the approximately 8.3 acres of vacant land represents approximately 6.5 percent of the Town's 122-acre commercial districts within the Town's approximately 25-square-mile incorporated area and would, thus, generate a negligible percentage increase in total runoff. In addition, the Town requires that all new development retain on-site the runoff produced from a one-hour 20-year storm event. This would reduce the downstream impact of the development, both within the Town and within the natural channels beyond the Town. Retention of runoff also reduces the sediment and nutrient material that is washed from roofs, roads, and other hard surfaces. With the use of on-site retention, road and storm drain design consistent with Town Standards and the 2005 Storm Drain Master Plan, and off-site detention, impacts with respect to streambed or drainage patterns alteration, runoff in excess of existing capacity, or substantial degradation of water quality would not occur. Therefore, impacts with respect to these issues would be less than significant and no further analysis in an EIR is necessary.

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

Less than Significant Impact. Any future housing related to the Project would be located within the Town's existing commercial districts, which terminate to the north of Mammoth Creek in the approximate vicinity of the Mammoth Creek Inn. The FEMA-mapped 100-year flood plain is located along Mammoth Creek, with the nearest section to the Project Area occurring in the vicinity of Mammoth Creek Park and Mammoth Creek Road to the south of the Mammoth Creek Inn. The Project Area is not within the 100-year floodplain which is located south of the southern edge of the Project boundary. Therefore, the Project would not involve the placement of any habitable structures within a flood hazard boundary. Impacts with respect to flooding would be less than significant and no further analysis of this issue in an EIR is necessary.

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

Less than Significant Impact. The Land Use Element/Zoning Code Amendments would not change the development patterns from those anticipated under the adopted General Plan in relationship to the flood plain. Moreover, no new buildings would be constructed within a 100-year floodplain or stream bed and, thus, would not impede or redirect flood flows. New or extended roadways under the Mobility Element Update have the potential to cross tributary streams and, as such, would be required to comply with State regulations and Town Standards related to roadway and culvert design to provide that all stream crossings accommodate the peak 100-year-storm flood level. Therefore, any potential new structures, such as bridges or culverts, would not impede or redirect flood flow within a 100-year flood plain. Impacts with respect to redirection of flood flow would be less than significant and no further analysis of this issue in an EIR is necessary.

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?

Less than Significant Impact. The Town of Mammoth Lakes EOP notes that three dams occur in elevations above the Town, including dams at Lake Mamie, Lake Mary, and Twin Lakes. Lake Mamie and Lake Mary drain into Twin Lakes. Twin Lakes impounds about 150 acre-feet and breach of its dam could send a 3-foot high wall of water downstream. Areas along Mammoth Creek, particularly in the Old Mammoth District, could experience considerable and rapid flooding within the 100-year floodplain. No critical facilities are located within the inundation area and the Town regulates development within floodplain areas where inundation is more likely to occur.[13] The Town's 100-year flood plains occur along the Mammoth Creek drainage and Murphy Gulch, which are defined in the Town's General Plan EIR as potential flood areas. Any future flooding or inundation is addressed under the discussion of the 100-year flood plain, above (see Responses to IX.g and h). No new dams or levees are anticipated under the General Plan or would be associated with the Project. Impacts associated with inundation by failure of a dam or levee would be less than significant and no further analysis of this issue in an EIR is necessary.

j. Inundation by seiche, tsunami, or mudflow?

Less than Significant Impact A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank and a tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of the sea floor associated with large, shallow earthquakes. These conditions are characteristic of a marine setting and are not applicable to the Project Area. Mudflows, however, can occur during wet weather or snow melt conditions in hillside areas and along cuts and ravines where unconsolidated materials occur or bedding planes are oriented downslope, or where deep soils are exposed to heavy rainfall or other water sources. During any construction in the Town's commercial districts, compliance with Section 12.08.078 of the Municipal Code for grading and earthwork would reduce the exposure of deeper soils to surface water, and the potential for mud flow would be considered negligible. In addition, adherence to adopted design standards for public works projects for new road construction would require retention and appropriate drainage along all cut slopes and, thus, would not generate mudflows or exacerbate hillside instability conditions. All construction projects must also comply with the Lahontan Water Quality Control Plan to

[13] *Mono County and Town of Mammoth Lakes, Mono County Multi-Jurisdictional Local Hazard Mitigation Plan, pages 30-31, October 2006.*

reduce exposure of soil to surface water runoff. Therefore, the potential to cause mudflows as a result of roadway construction would also be negligible. Impacts associated with inundation by failure of a dam or levee, seiche, tsunami, or mudflows would be less than significant and no further analysis of this issue in an EIR is necessary.

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less than Significant Impact. The proposed Land Use Element/Zoning Code Amendments would require a minimum 0.75 FAR and would allow a maximum 2.0 FAR. These changes would potentially result in greater residential and commercial development than anticipated under the existing General Plan. However, the proposed amendments would not change the configuration of the zoning districts or the overall pattern of development within the Town. Any development in the commercial districts would represent infill of the Town's existing commercial districts and would not require the alteration or closure of roadways and routes to surrounding residential and industrial neighborhoods. The Mobility Element Update emphasizes non-motorized transportation, to facilitate multi-modal access throughout the commercial districts, and to improve connectivity among the Town's neighborhoods through new streets and road extensions. These changes would increase commercial and pedestrian activity and social interactions among Town residents as well as visitors. In addition, new or extended roadways under the Mobility Element Update would improve traffic flow and access throughout the area. These conditions would reduce community disconnections and division. Therefore, impacts related to the physical division of an established community as a result of changes to the Town's General Plan policies would be less than significant. No further analysis of this issue in an EIR is necessary.

b. Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project would amend the Town's Zoning Code and the General Plan to:

1. Allow for intensified development within the Town's commercial districts, including the Mixed Use Lodging Residential (MLR), Old Mammoth Road (OMR), and Downtown (D) districts,

2. Update the Mobility Element to emphasize and encourage non-motorized transportation. The update would result in complete streets through the extension of some segmented roads or development of new roads.

3. Remove the "People At One Time" (PAOT) policy in order to move forward with an impact-based assessment . In the past, the Town proposed to limit growth through the PAOT concept. PAOT was established to describe population intensity and, accordingly, Policy L.1.A of the General Plan states: *"Limit total peak population of permanent and seasonal residents and visitors to 52,000 people."* Subsequently, the Town moved away from the policy of monitoring growth to a policy of evaluating potential impacts of a project relative to the quality of life and the environment rather than focus on a particular number of people that could result from development. The impacts-

based approach is intended to help ensure that growth in the Town would not exceed the carrying capacity of infrastructure or other constraints.

Although it is expected that the Project would be in general conformance with the intent of the General Plan, because the Project would change text and development standards set forth in the Zoning Code and General Plan and update the Mobility Element, the changes will be further evaluated in the EIR to ensure general compliance with policies adopted for the purpose of mitigating environmental effects.

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

Potentially Significant Impact. The Project would result in the disturbance of previously undisturbed land with the development of vacant properties within the commercial districts and construction of new roadways identified in the Mobility Element Update. A variety of biological resources are known to exist in portions of the project areas. These resources include: natural communities such as conifer forest and great basin sagebrush scrub; special status wildlife species such as northern goshawk (*Accipiter gentilis*), greater sage grouse (*Centrocerus urophasianus*) and Sierra Nevada red fox (*Vulpes vulpes necator*), as well as many more common wildlife species; and, special status plants such as smooth saltbush (*Atriplex pusilla*), Long Vallry milkvetch (*Astralagus johannis-howellii*) and Father Crowley's lupine (*Lupinus padre-crowleyi*), as well as many common species. Thus, development of vacant lands may conflict with one or more of the local policies or ordinances protecting biological resources in the Town's Resource Management and Conservation Element or Municipal Code. As there may be potentially significant impacts, the issue of conformance with any habitat conservation plans or natural community conservation areas, such as Critical Aquatic Refuges (CARs) proposed in the Sierra Nevada Forest Plan Amendment (USDA 2001c), will be further evaluated in the EIR.

XI. MINERAL RESOURCES

Would the project:

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?

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?

Less than Significant Impact (a-b). Mineral resources in the Mammoth Lakes region (Planning Area) include industrial minerals (clay, aggregate, cinders, etc.) and precious metals associated with volcanic rocks and hot spring and geothermal activity. The Project does not incorporate heavy industrial uses that would increase demand or availability of minerals and does not propose mineral development activities. The potential construction of new and redeveloped buildings in the Town's existing commercial districts and construction of extensions of existing streets under the Mobility Element Update would not occur in areas of known mineral resources, which are located outside of the Town boundaries.[14] The construction of new roadway segments would not impede access or the potential for direct use or future exploration of mineral resources in the region. Therefore, impacts with respect to the loss of availability of mineral resource would be less than significant. No further analysis of these issues in an EIR is necessary.

[14] *Town of Mammoth Lakes General Plan EIR, Figure 4.4-1, May 2007.*

XII. NOISE

Would the project result in:

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?

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

Potentially Significant Impact (a-d). Construction of buildings and street segments under the Project could create periodic and short-term noise, including groundborne vibration and noise, which could exceed established noise standards. The potential higher number of residents and greater commercial floor area that could occur under the proposed Land Use Element/Zoning Code Amendments compared to the existing General Plan estimated buildout could increase noise levels due to new or increased use of existing vacant or currently underutilized sites. During operation, vehicle noise associated with new road segments could also increase noise levels at sensitive receptor sites. Accordingly, potential increases in construction and operational noise are considered significant, and a noise analysis will be included in an EIR. The analysis will include a discussion of both temporary construction and operational noise increases and the potential for significant impacts on Town's residents and other sensitive receptors.

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

Less than Significant Impact (e-f). Proposed Land Use Element/Zoning Code Amendments could increase commercial and residential development in the commercial districts compared to buildout estimates under the existing General Plan. However, future development would occur within the same land use pattern and locations described in the General Plan and would not be located within the vicinity of an airport. As evaluated in the General Plan EIR, the nearest airport to the commercial districts is the Mammoth Yosemite Airport, located approximately 7.5 miles to the southeast of the Town of Mammoth.[15] No airstrips of heliports are located within the Town of Mammoth Lakes. As indicated above in Response No. VIII.e., the Mammoth/June Lake Airport Land Use Plan (ALUP) establishes a comprehensive land use plan that defines the type and pattern of future development in the area surrounding the existing airport. Helicopter use or landings in the area use may occur during emergency situations or if/when filming occurs in Town. However, because this would not be a regular occurrence it would not generate higher ambient noise levels.

[15] *Town of Mammoth General Plan EIR, page 4-291, May 2007.*

The Land Use Element/Zoning Code Amendments would not alter the land uses or land use patterns within the Town. Airport noise impacts would not be pertinent to the proposed Mobility Element Update because the latter does not affect the location of occupied structures, such as residences or businesses. Implementation of the Project would not expose people to excessive airport related noise levels because of the proximity of an airfield or heliport or helistop and impacts with respect to this issue would be less than significant. Airport noise would be less than significant and analysis of this issue in an EIR is not necessary.

XIII. POPULATION AND HOUSING

Would the project:

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)?

Potentially Significant Impact. The Project would potentially add new residential, visitor, and employment population to the Town by allowing a more intensified buildout within the commercial districts than under the current General Plan. Compared to the current General Plan buildout, the proposed 2.0 FAR would allow a net increase of approximately 313 residential units and approximately 430,018 square feet of commercial floor area. The 2.0 FAR would allow up to 951 hotel rooms, compared to 524 to 1,048 hotel rooms allowed under the current General Plan buildout estimate. This represents a potential net change ranging from 427 additional hotel rooms to a reduction of 97 rooms.

Policy L.1.A of the Town of Mammoth Lakes General Plan currently limits peak population and visitors to 52,000 people, using a concept of People At One Time or PAOT. In April 2009 the Town Council adopted the PAOT/Impact Assessment Policies, which included direction to *"(s)hift from PAOT based project evaluation to impact-based evaluation and mitigation."* The proposed General Plan Amendment of Policy L.1.A would change the approach to allow potential growth based on monitoring growth through evaluation of the potential impacts of a project relative to the quality of life and the environment rather than to focus on a particular number of people that could result from development. Under the proposed approach, rather than using the Town's PAOT model, which assumes 2.4 persons per permanent resident and 4.0 persons per transient unit, potential impacts would be assessed on a project-by-project basis through use of Project Impact Evaluation Criteria (PIEC) and/or environmental review, including but not limited to evaluations of air quality, including vehicle miles travelled (VMT); biological resources; cultural resources; geology and soils; hazards; hydrology; land use; noise; transportation, public services and utilities, including water demand.

While the Land Use Element/Zoning Code Amendments would directly induce growth, new roadways constructed under the proposed Mobility Element Update are not likely to generate new growth because respective new roadways and extensions would occur within the Urban Growth Boundary and result in complete street networks. Because changes in the Zoning Code and General Plan amendments could cause an increase in the Town's buildout in the commercial districts, this issue will be evaluated further in an EIR.

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

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

Potentially Significant Impact (b-c). Project implementation would allow for the intensification of development within the commercial districts. Redevelopment of properties within the commercial districts could result in the temporary removal of existing residential units or hotel rooms. Any displaced residents would require replacement housing. Because the proposed Land Use Element/Zoning Code Amendments may result in the need for replacement housing, this issue will be evaluated further in an EIR.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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.

Potentially Significant Impact. The Mammoth Lakes Fire Protection District (MLFPD) provides fire protection and emergency response within the Town of Mammoth Lakes. Existing characteristics of the Town, including narrow roadways and limited points of entry/exit, would be improved by the Mobility Element Update. Increases in population result in an increase in the demand for fire protection services, which is based on per capita demand. Given the intensification of development that could occur in the commercial districts, the potential increase in permanent and seasonal residents associated with the increase in potential buildout development would increase demand on fire protection and emergency medical services and could result in a potentially significant impact on fire protection services. In addition, the construction of new street segments under the Mobility Element Update may cause temporary lane closures or other access issues that would affect emergency response. However, when completed, new roadway segments would provide greater connectivity throughout the Town and would enhance emergency access. Because the proposed Land Use Element/Zoning Code Amendments could increase demand and temporary emergency access impacts could occur during construction and the vacation of the frontage road would reconfigure Main Street, the ability of the MLFPD to provide adequate fire protection services with Project implementation will be evaluated in an EIR.

b. Police protection.

Potentially Significant Impact. Police protection in the Town of Mammoth is provided by the Mammoth Lakes Police Department (MLPD), the Mono County Sheriff's Department (MCSD), and the California Highway Patrol (CHP). Increases in population can result in an increase in the demand for police protection services, which is based on per capita demand. The proposed Land Use Element/Zoning Code Amendments would allow an increase of up to 313 residential units, 430,018 square feet of commercial floor area compared to the existing General Plan buildout estimate, and up to 951 hotel rooms, compared to 524 to 1,048 hotel rooms allowed under the current General Plan buildout estimate. The potential intensification in the commercial districts and the relative increase in permanent and seasonal residents and employees could increase demand on police services and could result in a potentially significant impact on police protection

services and resources. Because the proposed Land Use Element/Zoning Code Amendments could increase demand and temporary emergency access impacts could occur during construction and the vacation of the frontage road would reconfigure Main Street, the ability of the affected law enforcement agencies to provide adequate police protection services with Project implementation will be evaluated further in an EIR.

c. Schools.

Potentially Significant Impact. The Mammoth Lakes Unified School District (MUSD) provides education for grades Kindergarten (K) through 12, with facilities that include Mammoth Elementary School, Mammoth Middle School, Mammoth High School, Sierra High School, and the Mammoth Olympic Academy for Academic Excellence. Increases in permanent population would increase the demand for school services, which is based on the estimated rate of children within respective new households. The proposed Land Use Element/Zoning Code Amendments would allow an increase of up to 313 residential units and approximately 430,018 square feet of commercial floor area compared to the existing General Plan buildout estimate. The potential increase in residential population and associated students would increase demand on school services and could contribute to the need for additional school facilities and services. The increase in demand could, thus, result in a potentially significant school impact. The ability of the MUSD to provide adequate school services with Project implementation will be evaluated further in an EIR.

d. Parks.

Potentially Significant Impact. The Town provides recreational facilities for use by the general public. Existing parks comprise approximately 18 acres, owned and operated by the Town, in addition to four acres at Mammoth Creek Park and 12.5 acres at Shady Rest Park operated by the Town under a Special Use Permit from the USFS, and 18.66 acres at Whitmore Park operated jointly by the Town and Mono County from Los Angeles Department of Water and Power (LADWP) land. The proposed Land Use Element/Zoning Code Amendments would result in a potential increase of up to 313 residential units and approximately 430,018 square feet of commercial floor area compared to the existing General Plan buildout estimates, and up to 951 hotel rooms, compared to 524 to 1,048 hotel rooms estimated for the existing General Plan buildout. The potential increase in permanent and seasonal residents associated with the relative increase in potential buildout development would increase demand on parks and recreational facilities and could result in a potentially significant impact on these resources. Therefore, the ability of the Town to provide adequate parks services with Project implementation will be evaluated further in an EIR. Direct impacts to park facilities are similarly addressed under Response No. XV.a, below.

e. Other governmental services (including roads).

Potentially Significant Impact (Library Services). Library services in the Town of Mammoth Lakes are provided by Mono County, which operates a branch in the Town. Potential new growth in residential units and employment opportunities represented by the Project would introduce new demand for library services that could result in a potentially significant impact on this public service. Therefore, the ability of Mono County to provide adequate library services with Project implementation will be evaluated further in an EIR.

Less than Significant Impact (**Street Maintenance and Snow Removal).** The proposed Mobility Element Update would result in additional roadways and potential increase in maintenance and snow removal requirements. This would primarily fall under the purview of the Town's Public Works Department. Depending on the ownership of the respective roadways, a variety of Town, Mono County, or state funding

sources would fund street maintenance. Maintenance activities regarding the new street components are not anticipated to result in significant physical impacts associated with the provision of new or physically altered governmental facilities. Therefore, a less than significant impact would occur in this regard. Further analysis of street maintenance facilities in an EIR is not necessary.

XV. RECREATION

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?

Potentially Significant Impact (a-b). As discussed in Section XIV.d, above, the potential intensification of development within the commercial districts that would result from the proposed Land Use Element/Zoning Code Amendments would introduce new population to the Town not anticipated under the existing General Plan. This would generate greater demand for public recreational and park facilities and services, which could require the potential need for the expansion of existing or construction of new facilities. Because new construction could result in potentially significant impacts, this issue will be evaluated further in an EIR.

XVI. TRANSPORTATION/TRAFFIC

Would the project:

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?

Potentially Significant Impact (a-b). The project could result in an increase in the intensity of development in the commercial districts and in changes to the transportation network in the Town. A traffic study will be prepared to evaluate the Project's potential to result in traffic impacts (i.e., reduction in the level of service at study intersections) as well as to evaluate the vehicle miles traveled. The results of the traffic study will be presented in an EIR.

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?

No Impact. The Project does not propose any structures that would interfere with air traffic patterns; nor is the Project expected to increase use of the Mammoth Yosemite Airport to a level that would significantly

increase air traffic levels or require a change in air traffic patterns thereby increasing traffic levels. Thus, no impact regarding air traffic patterns would occur with Project implementation. Further analysis of this issue is not necessary in an EIR.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. The proposed Mobility Element Update involves improvements to the local and regional transportation network and would establish a multimodal framework with the purpose of being connected, accessible, uncongested, and safe. Proposed street improvements would enhance connectivity throughout the Town, reduce pedestrian/vehicle conflicts, create a more active street front on Main Street, and increase the overall capacity of the Town's road system. The Update would also identify opportunities for new signals and roundabouts throughout Town. Roadway design would be consistent with Town of Mammoth Lakes standards,[16] which are intended to standardize street design and improve road safety. Although the Mobility Element Update anticipates improvements to safety, several major design features such as new signals and roundabouts and vacation of the existing frontage road along Main Street to provide a single street, the redesign of roadways and intersections has the potential to change patterns of use and result in unanticipated hazardous conditions. Because of the extent of the proposed changes, the safety aspect of the Mobility Element Update will be further evaluated in an EIR.

e. Result in inadequate emergency access?

Potentially Significant Impact. The Mobility Element Update proposes the construction of new roadway extensions and segments, including the consolidation of Main Street (vacation of frontage road, turn lanes, etc.), connections to USFS property at the north side of Main Street, new north-south access via Thompsons Way, extension of Tavern Road to the east, extension of Sierra Nevada Road to the east, connections to the Shady Rest site, extension of Callahan Way to the south, and the extension of 7B (Sierra Star) to connect Minaret Road to East Bear Lake Drive and to Main Street. Although the proposed Land Use Element/Zoning Code Amendments have the potential to increase residential and visitor traffic in the Town's commercial districts and access highways, the improvement in connectivity would likely improve emergency access at the completion of proposed improvements. However, roadway construction has the potential to cause the closure of lanes or streets, which could increase congestion and reduce emergency access. Because any reduction in emergency access would be potentially significant, this issue will be evaluated further in an EIR.

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?

Potentially Significant Impact. The Mobility Element Update is intended to improve the local and regional transportation network and establish a multimodal framework for the Town. In 2014, the Town accepted the Main Street Plan for the transformation of the Main Street corridor from an auto-dominated state highway that passes through town into a pedestrian-first street. This represents a move that would transform existing multimodal facilities. Action items under the Mobility Element Update consist of additional pedestrian, bicycle, and transit networks. Because the Mobility Element Update would change existing policies and conditions relative to public transit, bicycle, and pedestrian facilities in the Town, the

[16] *Town of Mammoth Lakes Department of Public Works, Standards, Section 100, Streets and Highways, July 2013.*

Update has the potential to conflict with existing policies. Therefore, the environmental effects of the Update with respect to multi-modal policies and conditions will be evaluated further in an EIR.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Potentially Significant Impact. Project implementation would generate new growth in excess of existing General Plan buildout estimates. Compared to the current General Plan buildout, the proposed 2.0 FAR would allow a net increase of approximately 313 residential units and approximately 430,018 square feet of commercial floor area. The 2.0 FAR would allow up to 951 hotel rooms, compared to 524 to 1,048 hotel rooms allowed under the current General Plan buildout estimate, which represents a potential net change ranging from 427 additional hotel rooms to a reduction of 97 rooms. This relative increase over General Plan buildout estimates could result in impacts to wastewater treatment facilities and, thus, exceed treatment requirements of the Lahontan RWQCB. Because impacts related to treatment requirements would be potentially significant, this issue will be analyzed further in an EIR.

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

Potentially Significant Impact. Project implementation would potentially allow for growth in excess of existing General Plan buildout estimates. The relative increase over existing General Plan buildout estimates would generate water demand and wastewater generation for the Town not anticipated under the current General Plan and, thus, potentially impact water and wastewater treatment facilities. Because impacts related to treatment facilities would be potentially significant, this issue will be evaluated further in an EIR.

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

Potentially Significant Impact. Proposed development growth that could occur under the Land Use Element/Zoning Code Amendments would involve the infill of approximately eight acres of vacant land, which would be converted from permeable to impermeable surfaces. The location of new growth in the Town's commercial districts would increase the runoff of snow melt and storm water into the existing drainage system serving that area. The Town requires that all new development retain on-site the runoff produced from a one-hour 20-year storm event, which would reduce the downstream impact of new development. However, because new growth would be concentrated in the commercial districts, the potential exists that any increase in runoff would impact adjacent storm drains. In addition, implementation of the Project would require grading and potential alterations in the local drainage patterns at respective construction sites; and would require verification of available capacity in the local drainage system. Also, the Mobility Element Update would include a reconfiguration of Main Street including utility relocations. Therefore, this issue will be evaluated further in an EIR.

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

Potentially Significant Impact. The Mammoth Community Water District (MCWD) is the supplier to the public water system for the Town of Mammoth Lakes. The MCWD's Urban Water Management Plan (UWMP) estimated that the MCWD had adequate supplies to support the existing General Plan buildout;[17] however, given the increase in intensity of development that could occur, a Water Supply Assessment (WSA) is required to determine adequacy of supply. In addition, the proposed changes on Main Street, which would result in an increase in landscaping within the public right-of-way, could increase water demand. Thus, the Land Use Element/Zoning Code Amendments, which would increase population relative to the estimated General Plan buildout, the increase in landscaping, and the recent and potentially on-going drought conditions, which could affect water supply, have the potential to adversely affect the ability of the MCWD to meet domestic water demand with implementation of the Project. Because the Project would increase demand beyond the estimated demand under the General Plan buildout, and a potential shortfall in supply could occur, this issue will be evaluated further in an EIR.

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 the provider's existing commitments?

Potentially Significant Impact. The MCWD owns and operates the sewage collection systems, including pump stations and more than 35 miles of sewer mains and interceptors that serve the Town. Main trunks are located in Main Street, Old Mammoth Road, Meridian Boulevard, and Sierra Star Golf Course to Center Street. The MCWD concluded that adequate treatment capacity existed in the system to support the existing General Plan at buildout.[18] However, the potential intensification within the commercial districts that could occur as a result of the Land Use Element/Zoning Code Amendments would increase population relative to the estimated General Plan buildout. The increase in population would increase wastewater. Therefore, a potential shortfall in treatment availability could occur and this issue will be analyzed further in an EIR.

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 and regulations related to solid waste?

Potentially Significant Impact (f. and g.). Solid waste disposal is provided at the Benton Crossing Landfill, which is owned and operated by Mono County. It is anticipated that the Benton Crossing Landfill will remain open until December 2023.[19] To reduce solid waste flow, the Town operates a waste collection and recycling program in accordance with Assembly Bill 939 and provides for collection of plastic, aluminum, glass, metal, paper, and cardboard. A number of state policies address the availability of sufficient landfill capacity and the diversion/recycling of solid waste. In addition, the population growth that could occur as a result of the proposed Land Use Element/Zoning Code Amendments relative to current General Plan growth estimates could increase demand on the landfill. Therefore, the capacity of the Benton Crossing Landfill and the

[17] *Town of Mammoth Lakes General Plan EIR, page 4-258, May 2007.*

[18] *Town of Mammoth Lakes General Plan EIR,, page 4-266, May 2007.*

[19] *Town of Mammoth Lakes General Plan EIR,, page 4-267, May 2007.*

compliance of the Town with applicable regulations and guidelines for waste reduction will need to be evaluated to determine available landfill capacity. Since the Project could result in a potentially significant impact, this issue will be analyzed further in an EIR.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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?

Potentially Significant Impact. As discussed above, the Project could result in potentially significant impacts related to aesthetics, forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, land use and planning, noise, population and housing, public services (fire, police, parks, schools, and library), recreation, transportation/traffic, utilities and service systems (water supply, sewer, storm drains, and solid waste). In addition, impacts to any of the issue areas described above (which have been identified as potentially significant) could be considered to affect the quality of the environment. This impact is considered potentially significant and will be analyzed further in an EIR.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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.)

Potentially Significant Impact. As discussed above, the Project could result in potentially significant impacts related to aesthetics, forestry resources, air quality, biological resources, cultural resources; greenhouse gas emissions, land use and planning, noise, population and housing, public services (fire, police, parks, schools, and library), recreation, transportation/traffic and utilities (water supply, sewer, storm drains, and solid waste). Because the Project would result in potentially significant impacts in these issue areas, it has the potential to result in potentially significant cumulative impacts in the same issue areas. Therefore, the EIR will evaluate potential cumulative impacts associated with aesthetics, forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, transportation/traffic and utilities and service systems.

The Project would comply with all applicable local, State and federal regulations related to geology and soils, hazards and hazardous materials, and hydrology and water quality. Compliance with existing regulations would ensure that environmental impacts related to geology, hazards, and hydrology and water quality would be less than significant. Compliance with applicable regulations by the Project and cumulative projects would preclude significant cumulative impacts in these issues areas. In addition, because the Project would not cause a reduction in mineral resources or prevent access to the area's mineral resources, it would not result in significant impacts to mineral resources or in cumulative impacts with respect to such.

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

Potentially Significant Impact. The General Plan Land Use Element/Zoning Code Amendments and the Mobility Element Update have the potential to result in significant environmental effects as discussed in this Initial Study. Therefore, these issues will be discussed in the relevant sections of the EIR.

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