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VIA EMAIL AND FACSIMILE

to: smoberly@townofmammothlakes.ca.gov
Fax: (760) 934-7493

Sandra Moberly
Planning and Economic Development Manager
Community & Economic Development Department
Town of Mammoth Lakes

**Re: Major Design Review permit application 16-012
Grocery Outlet**

Ms. Moberly:

This office is submitting this letter on behalf of concerned Mammoth Lakes residents. Their concern focuses on the proposed Major Design Review permit application 16-012, relating to proposed construction of a Grocery Outlet. Please direct copies of this letter to the Planning and Economic Development Commission Members and Staff.

The Commission raised a number of issues of concern regarding the orientation of the parking on the site and related design issue at the previous hearing for the project. We would like to thank the Commission for their close attention to this issue, and raise some other issues that are implicated by the current proposals for the project.

We are concerned that the project, as proposed, may have significant impacts on the physical and built environment of Mammoth Lakes that warrant initial study.

- (1) Due to the unique nature of grocery/high intensity retail uses, there could be noise impacts on sensitive receptors as a result of loading dock and truck noise. The plans as made available to the public do not seem to contain any study of the potential schedule for deliveries, the unique contours of the site as they may attenuate (or not attenuate) noise, and what efforts will be made to monitor noise from the site to ensure compliance with the City noise ordinance; and,

(2) Relatedly, grocery uses in commercial zones provide differing models and standards for traffic impacts. This is recognized, for example, by the Institute of Transportation Engineers (“ITE”) trip generation manual, which classifies trip generation from grocery uses distinctly from other retail uses. We are concerned that, given the orientation of the parking, there may be queueing or “cruising” that will result in car emissions that could degrade the ambient air quality. This is of particular concern given Mammoth Lake’s environment; and

(3) Given the existing blend of current commercial uses surrounding and near to the project site, there is potentially an increased likelihood that there could be an impact on the built and physical environment in the form of empty structures. Again, this relates to the unique nature of grocery uses; grocers are extremely low-margin enterprises, and even small, short-term fluctuations in revenue can result in store closures, and make a market unappealing for new entrants, which can contribute to long-term vacancies that can degrade the physical and built environment of a community; and,

(a) Relatedly, an urban decay study should be conducted to properly study the impact on the built and physical environment.

(4) There is some question about whether the introduction of another grocery use the area will frustrate the sustainability/walkability/bikeability elements of the General Plan. Grocery, unlike boutique retail or entertainment uses, is uniquely dependent on automotive traffic unless intermodal options are made readily available. An analysis of how the site could be planned to encourage non-automotive access to the site to ensure that the City is not permitting a project that will form a semi-permanent obstacle to the General Plan’s walk/bikeability elements is necessary to ensure full conformity with the General Plan; and

(5) We are also requesting that the City Staff direct us to the rationale for exemption from CEQA more generally; the state CEQA Clearinghouse did not contain information regarding this project as of the date of this hearing. We do not believe the Design Review process is exempt from CEQA as a ministerial project, nor that the potential impacts, given the above, survive the “fair argument” standard for potentially significant impacts that would otherwise require preparation of at least an Initial Study.

We would also like to request that the City keep us individually apprised of further proceedings, changes, or developments related to this project, via mail and email to:

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Thank you in advance for your attention to and work on this matter.

Sincerely,

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c: Client; File