October 2019

Mammoth Creek Park West New Community Multi-Use Facilities

ENVIRONMENTAL IMPACT REPORT ADDENDUM

PREPARED FOR:

Town of Mammoth Lakes

PREPARED BY:

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FINAL
ENVIRONMENTAL IMPACT REPORT ADDENDUM

Mammoth Creek Park West
New Community Multi-Use Facilities

SCH NO. 2016062009

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October 2019

JN 174216

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1.0 INTRODUCTION

This Addendum has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended, to evaluate the potential environmental impacts of the proposed modifications to the Mammoth Creek Park West New Community Multi-Use Facilities Project (approved project) as analyzed in the *Mammoth Creek Park West New Community Multi-Use Facilities Final Environmental Impact Report* (2017 EIR), State Clearinghouse No. 2016062009, certified in May 2017.

This Addendum focuses on the proposed modifications to the approved project, which involves constructing a fully enclosed approximately 40,320-square foot sprung structure housing all indoor multi-use facilities rather than a partially enclosed approximately 43,000-square foot pitched roof structure, inclusive of a 13,000-square foot complementary community center, as analyzed in the 2017 EIR. This Addendum provides an assessment of potential environmental impacts associated with the minor project modifications compared to the assumptions from the 2017 EIR.

Additionally, project-specific effects related to energy and wildfire, although considered, were not specifically identified in the 2017 EIR as these topics were not a subject matter that required threshold evaluation pursuant to CEQA at that time. As such, this Addendum also analyzes the project's impacts related to these topical areas.

1.1 PURPOSE OF AN ADDENDUM

CEQA, a Statewide environmental law contained in Public Resource Code (PRC) Sections 21000–21177, applies to most public agency decisions which carry out, authorize, or approve actions that have the potential to adversely affect the environment. The CEQA Guidelines allow for updating and using a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an addendum to a previously certified EIR may be prepared, consistent with CEQA Guidelines Section 15164. This Addendum has been prepared in accordance with Section 21166 of CEQA and Sections 15162 and 15164 of the CEQA Guidelines.

Section 15164(a) of the CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the CEQA Guidelines, a Subsequent EIR or Negative Declaration is only required when:

1. *Substantial changes are proposed in the project which will require major revision of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous EIR due to the involvement of new significant environmental increase in the severity of previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with*

the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR;

(b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines Section 15162[a])

The following describes the requirements of an Addendum, as defined by CEQA Guidelines Section 15164:

1. *The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

2. *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*

3. *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

4. *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

5. *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared, consistent with CEQA Guidelines Section 15164.

This Addendum to the 2017 EIR for the Mammoth Creek Park West New Community Multi-Use Facilities Project has been prepared, since the evaluation of the proposed modifications does not result in any of the circumstances requiring a Subsequent or Supplemental EIR or Negative Declaration. Although the proposed modifications would result in development that slightly differs from that assumed in the 2017 EIR, these modifications do not trigger the need for preparation of a Subsequent

or Supplemental EIR or Negative Declaration under the criteria listed in CEQA Guidelines Sections 15162 and 15163, respectively. Section 2.0, *Environmental Checklist*, and Section 3.0, *Environmental Analysis*, of this Addendum demonstrate that no substantial changes would result from the proposed project modifications nor have the existing conditions in the project vicinity substantially changed such that major revisions to the 2017 EIR would be required. The project would not result in a new significant environmental effect or a substantial increase in the severity of previously identified significant effects. Specifically, the proposed modifications, as compared to the 2017 EIR, do not result in new or substantially greater significant impacts, as the scale and nature of the proposed modifications are sufficiently similar to those analyzed in the 2017 EIR such that the impacts of the proposed modifications are within the levels and types of environmental impacts disclosed in the 2017 EIR.

In addition, no substantial changes in circumstances under Section 15162(a)(2) have occurred since the certification of the 2017 EIR that would result in new significant impacts or substantially increase the severity of significant impacts previously identified, since the background environmental conditions have not significantly changed since that time. The Town of Mammoth Lakes has received no new information indicating there has been a substantial change in any circumstances that would result in a new or substantially greater significant impact.

Furthermore, no new information, which was not known and could not have been known at the time of the 2017 EIR preparation, has been revealed that shows new or substantially greater significant impacts would result (CEQA Guidelines Section 15162[a][3]). There are no new or different mitigation measures or alternatives that would substantially reduce one or more significant impacts identified in the 2017 EIR that are not adopted. The proposed modifications do not identify or require adoption of any further mitigation measures or alternatives beyond those provided in the 2017 EIR (CEQA Guidelines Section 15162[a][3]).

This Addendum relies on the 2017 EIR and the related administrative record, in addition to the additional documentation included to support the Addendum. The Addendum is to be included or attached to the 2017 EIR and is not to be considered as an independent or separate document.

As this Addendum does not identify new or substantially greater significant impacts, circulation for public review and comment is not necessary pursuant to CEQA Guidelines Section 15164(c).

1.2 PROJECT LOCATION

The project site is located within the Town of Mammoth Lakes (Town), in the southwest portion of Mono County, on the eastern side of the Sierra Nevada mountain range; refer to Exhibit 1, *Regional Vicinity*. Specifically, the project site is located at Mammoth Creek Park West (686 Old Mammoth Road) and is comprised of Assessor's Parcel Numbers (APNs) 040-140-001-000 and 040-140-002-000. The site is approximately 4.9 acres and is bounded by multi-family residential uses and commercial uses to the north, Old Mammoth Road to the east, recreational open space to the south, and multi-family residential uses to the west; refer to Exhibit 2, *Site Vicinity*. Vehicular access to the site is provided via Old Mammoth Road, and pedestrians/trail users can access the site via the Town Loop trail to the east and south of the project site. The primary local roadway providing access to the project site is Old Mammoth Road.

The Town's existing community center (1000 Forest Trail) and Mammoth Ice Rink/Mammoth RecZone (416 Sierra Park Road) are located approximately 1.4 miles to the northwest, and 0.3 miles to the northeast of the project site, respectively. The operations of the existing community center would continue. However, the winter and summer operations of the Mammoth Ice Rink/Mammoth RecZone would be relocated to the project site.

1.2.1 ENVIRONMENTAL SETTING

The project site, unchanged since the 2017 EIR, is comprised of Mammoth Creek Park West; refer to Exhibit 2. Mammoth Creek Park West currently includes playground equipment, grass/open space, picnic areas, trail connections, and a surface parking lot for 44 vehicles. Based on the *Town of Mammoth Lakes General Plan 2007* (General Plan) Land Use Map, the project site is designated Open Space (OS). Based on the Town's Zoning Map, the project site is zoned Public and Quasi Public (P-QP).

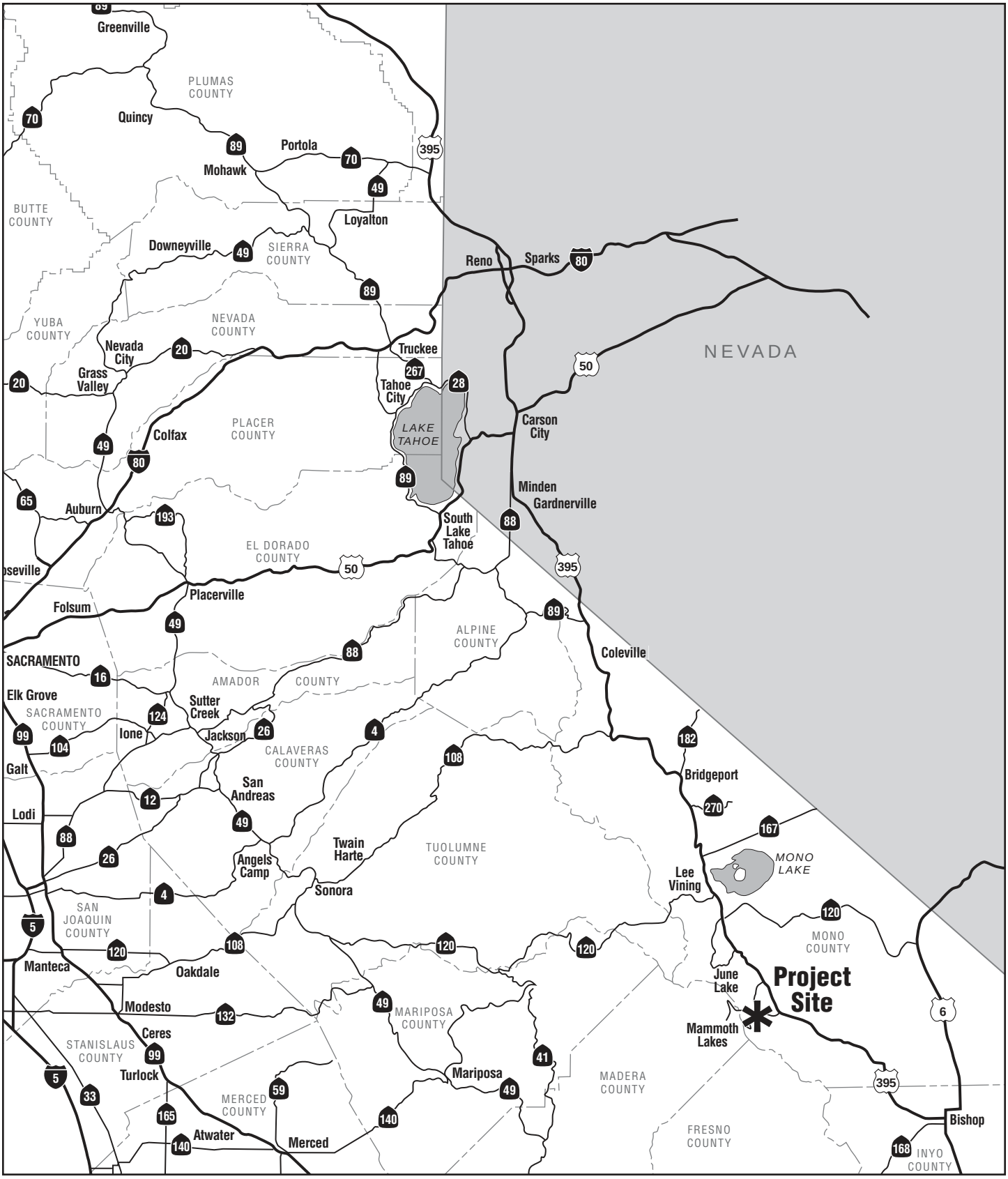
SURROUNDING LAND USES

Land uses surrounding the project site remain unchanged since the 2017 EIR, and include the following:

- *North*: Commercial/office uses, including The Stove restaurant and Mammoth Dental office, and multi-family residential uses (Chateau Blanc Condominiums) are located to the north of the project site. The General Plan land use designation to the north is Commercial 2 (C-2) and High Density Residential 2 (HDR-2). The zoning districts to the north are Old Mammoth Road (OMR) and Residential Multi-Family 2 (RMF-2).

- *East*: Open space/recreational trail uses (Town Loop trail), Mammoth Creek, Mammoth Creek Park East [owned by the U.S. Forest Service (USFS) and in part under a Special Use Permit to the Town], and Old Mammoth Road are located to the east of the project site. The General Plan land use designation to the east is National Forest (NF), which is applied to lands administered by the Inyo National Forest, owned by the USFS, that are outside the adopted urban growth boundary. Zoning districts are not applicable to the uses adjoining the project site to the east, as these uses are associated with the Inyo National Forest.

- *South*: The southern portion of Mammoth Creek Park West [owned by the USFS and in part under a Special Use Permit to the Town], open space/recreational trail uses (Town Loop trail), and Mammoth Creek bound the project site to the south. In addition, Old Mammoth Road is located further to the south. The General Plan land use designation is OS. The zoning district is P-QP with an Open Space/Stream Corridor overlay.



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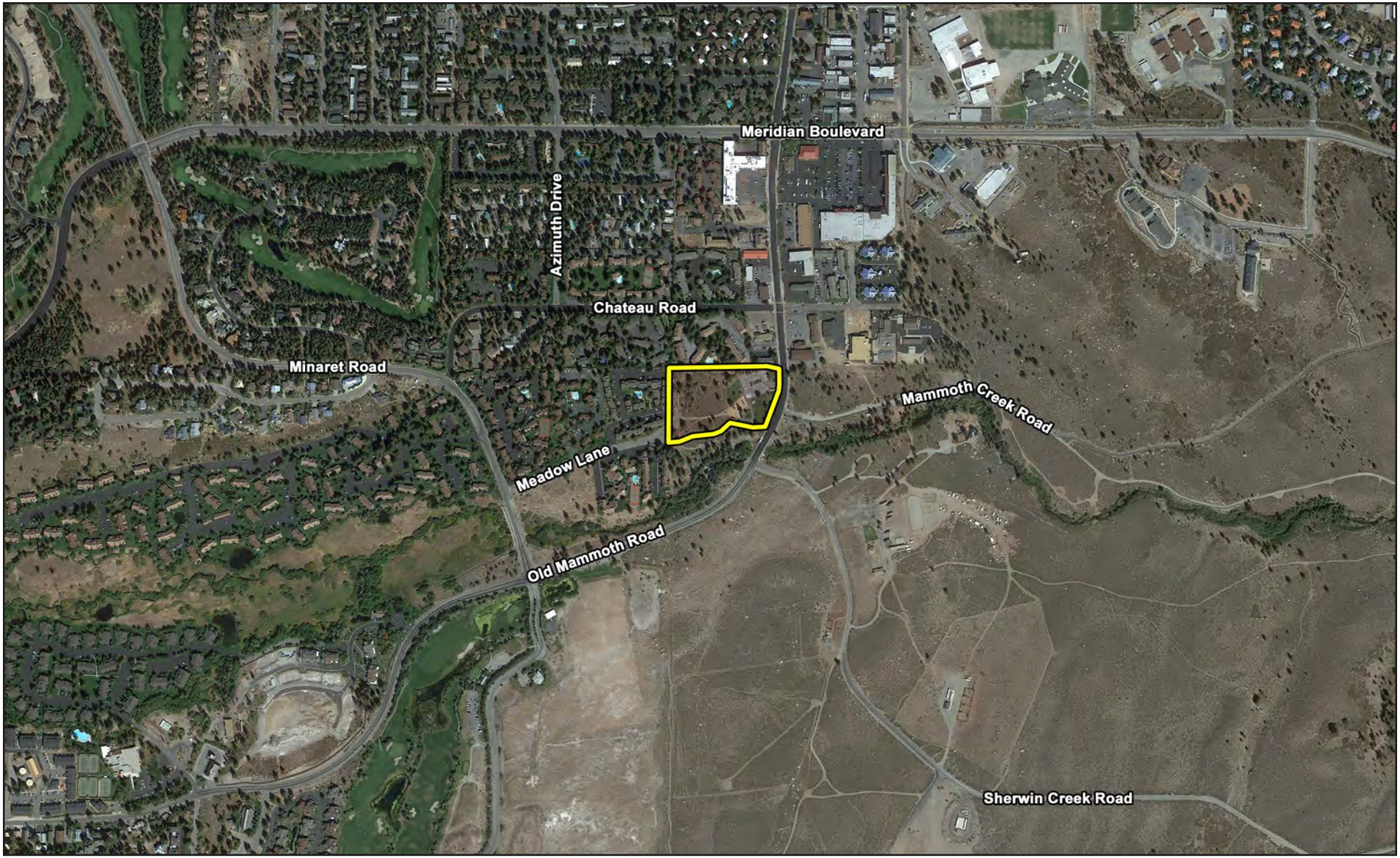
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ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Regional Vicinity

Exhibit 1



Source: Google Earth, 2019.

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Project Site

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ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Site Vicinity

Exhibit 2

- *West*: Multi-family residential uses (La Vista Blanc Condominiums) bound the project site to the west. Mammoth Creek Condominiums are situated further southwest of the project site. The General Plan land use designation to the west and southwest are HDR-2. The zoning district to the west and southwest are RMF-2 and RMF-2 with an Open Space/Stream Corridor overlay respectively.

1.3 PROJECT BACKGROUND

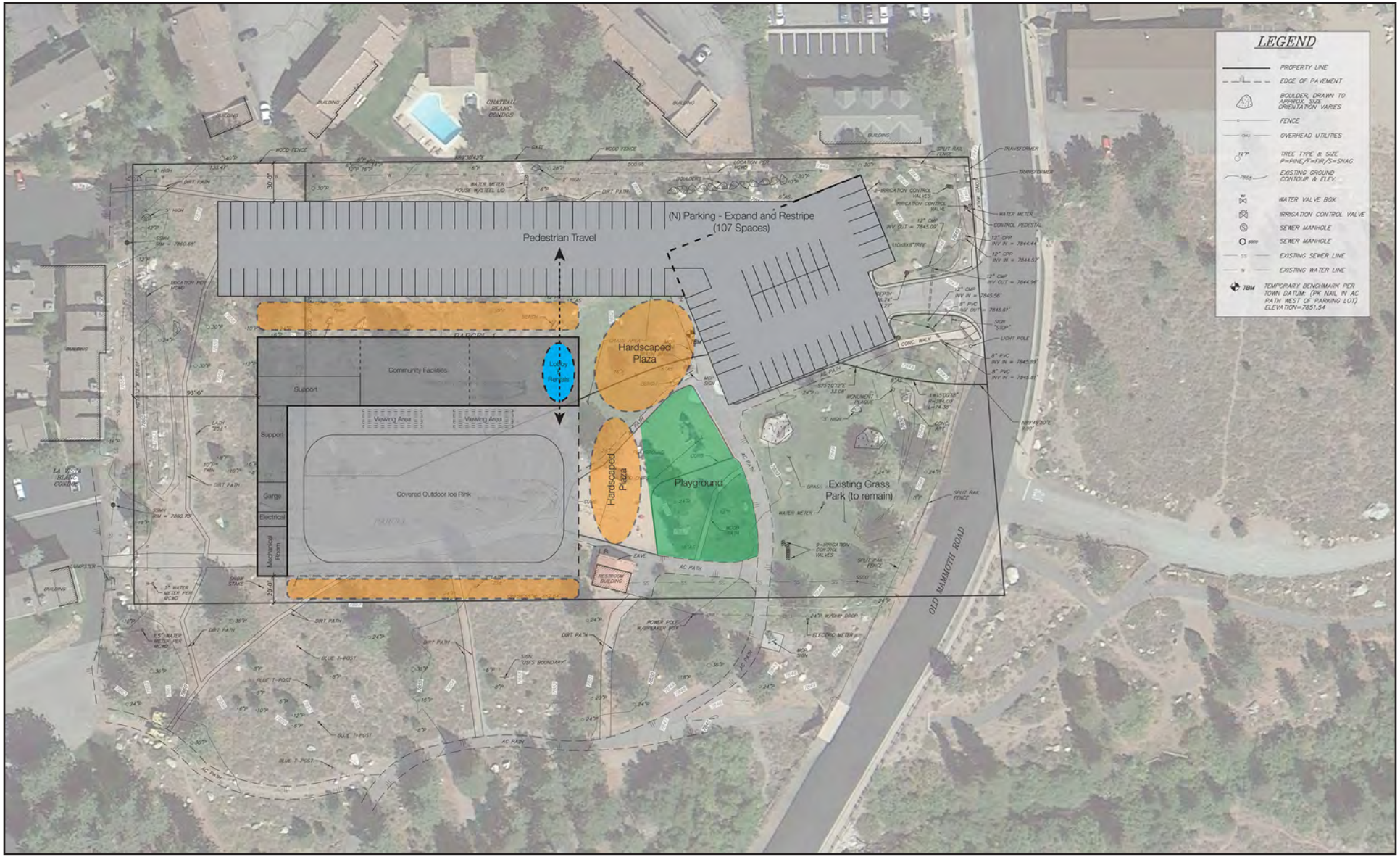
The 2017 EIR analyzed construction of new community multi-use facilities at the project site, including a maximum 100-foot by 200-foot ice rink (winter)/recreation/event area (RecZone) covered by an approximately 30,000-square foot roof structure and additional storage and support space; refer to Exhibit 3, *Conceptual Site Plan – Approved Project*. In addition, the approved project includes a 13,000-square foot complementary community center, reconfiguration and improvements to an existing playground to add accessible interactive components, restroom improvements, and 107 additional surface parking spaces. The approved project also includes an active outdoor recreation area to the west of the new community multi-use facilities. Upon project completion, the existing community center (located at 1000 Forest Trail) would continue while the winter and summer operations of the Mammoth Ice Rink/Mammoth RecZone (located at 416 Sierra Park Road) would be relocated to the project site. The 2017 EIR considered the following project features:

ICE RINK

The proposed ice rink/RecZone would be up to 100-feet long by 200-feet wide and oriented in an east-west direction. An approximately 30,000-square foot pitched roof structure would cover the ice rink/RecZone with two open sides to the south and east. Viewing areas and bleachers would be covered under the proposed roof structure. Areas for the ice preparation machine, chillers and storage of ice rink and RecZone equipment would be provided along the western boundary of the ice rink/RecZone. Space for skate rental, concessions and/or vending machines, Americans with Disabilities Act (ADA) accessible restrooms, and lockers for personal items would be included in the adjacent community center building. The ice rink would operate during the winter months (approximately November to April), and would provide a number of daily, weekly, and monthly recreational activities.

MAMMOTH RECREATION ZONE

In the summer months (approximately mid-May to mid-October) the multi-use facility would operate as the summer RecZone. The RecZone would be the home of Parks and Recreation Department summer camps and programs. The facility would offer daily and weekly programs, host monthly programs, and provide a venue for special events.



Source: HMC Architects, dated March 10, 2016.

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ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Conceptual Site Plan – Approved Project

Exhibit 3

COMMUNITY CENTER

The proposed 13,000 square-foot complementary community center would include multi-purpose rooms; a warming kitchen with concession space; office space; an arts/crafts/play room; meeting room; locker rooms; ADA-accessible restrooms, storage room, a mechanical room, and wall lockers. The community center would host a number of daily, weekly, monthly, and occasional community-based activities.

PARK PLAYGROUND

The square footage of the existing playground on the project site would remain the same. A new inclusive playground was installed in 2018 that resulted in the addition of new interactive features. These playground elements include freestanding play, horizontal ladders/upper body peddlers, rubberized surfacing, adaptive swings, communication skills, sensory walls, and story circles. In addition, the existing bathroom at the Mammoth Creek Park West would be updated for year-round use and to comply with ADA standards. The existing rock garden in the southeast portion of the project site would remain unchanged.

ACTIVE OUTDOOR RECREATION AREA

The area to the west of the proposed structures would be used as an active outdoor recreation area. Possible activities for this portion of the project site include a dog park, a BMX bicycle dirt track (during summer months), sledding hill (during winter months), and/or a community garden.

Since certification of the 2017 EIR, the Town has retained an architectural consultant to design the community multi-use facilities, including the proposed roof structure over the ice rink/RecZone. As such, the Town is considering construction of a sprung structure for the ice rink/RecZone in lieu of the previously proposed pitched roof structure.

1.3.1 CERTIFIED 2017 EIR

The 2017 EIR did not identify any significant and unavoidable impacts associated with the approved project. All environmental topical areas were determined to either have no impact, less than significant impact, or less than significant impact with mitigation incorporated, as summarized below.

No Impact

- Agriculture and Forestry Resources;
- Mineral Resources; and
- Population and Housing.

Less Than Significant Impact

- Geology and Soils;
- Greenhouse Gas Emissions;

- Hazards and Hazardous Materials;
- Land Use and Planning;
- Public Services;
- Recreation; and
- Utilities and Service Systems.

Less Than Significant Impact With Mitigation Incorporated

- Aesthetics/Light and Glare – short-term and long-term visual character/quality; and light and glare;
- Air Quality – short-term air quality emissions;
- Biological Resources – sensitive natural communities and wildlife corridors;
- Cultural Resources – historical, archaeological, and tribal cultural resources;
- Hydrology and Water Quality – short-term and long-term water quality impacts;
- Noise – short-term and long-term noise impacts; and
- Traffic and Circulation – short-term traffic and drive sight distance.

1.4 DOCUMENTS INCORPORATED BY REFERENCE

The following documents were utilized during preparation of this Addendum and are incorporated into this document by reference. These documents are available for review at the Town of Mammoth Lakes Community and Economic Development Department, located at 437 Old Mammoth Road, Suite R, Mammoth Lakes, CA 93546, and on the Town's website: http://www.townofmammothlakes.ca.gov.

- *Mammoth Creek Park West New Community Multi-Use Facilities Final Environmental Impact Report* (State Clearinghouse No. 2016062009, dated April 21, 2017). The *Mammoth Creek Park West New Community Multi-Use Facilities Final Environmental Impact Report* (2017 EIR) analyzed the construction of new community multi-use facilities, including an ice rink (winter)/recreation/event area (RecZone) covered by an approximately 30,000-square foot roof structure and additional storage and support space, and a 13,000-square foot complementary community center. The 2017 EIR also analyzed proposed reconfiguration and improvements to an existing playground to add accessible interactive components, restroom improvements, and 107 additional surface parking spaces. The project would also include an active outdoor recreation area to the west of the new community multi-use facilities. The 2017 EIR concluded that all environmental topical areas would either have no impacts, less than significant impacts, or less than significant impacts with mitigation incorporated. No significant and unavoidable impacts were identified.

- *Town of Mammoth Lakes General Plan 2007*. The Town of Mammoth Lakes Council adopted the *Town of Mammoth Lakes General Plan 2007* (General Plan) on August 15, 2007. The General Plan establishes standards, guidelines, and priorities that define the community now and for the future. The General Plan is organized by elements. Each element is introduced with an

explanation of the intent of the goals, policies, and actions within that element. The General Plan contains the following elements:

- Economy;
- Arts, Culture, Heritage, and Natural History;
- Community Design;
- Neighborhood and District Character;
- Land Use;
- Mobility (updated in 2016);
- Parks, Open Space and Recreation (updated in 2012);
- Resource Management and Conservation;
- Public Health and Safety
- Housing (updated in 2015); and
- Noise (1997).

- *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (State Clearinghouse No. 2003042155, dated May 2007). The *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (General Plan EIR) analyzed the environmental impacts associated with the update of the Town's General Plan. This update provided the Town's long-range comprehensive direction to guide future development and identified the community's environmental, social, and economic goals. The General Plan EIR document was prepared as a Program EIR, which is intended to facilitate consideration of broad policy directions, program-level alternatives, and mitigation measures consistent with the level of detail available for the plan. The General Plan EIR concluded significant and unavoidable impacts regarding aesthetics, air quality, biological resources, public safety and hazards, noise, public services and utilities, and recreation.

- *Mammoth Lakes Municipal Code* (codified through Ordinance No. 19-02, adopted March 6, 2019). The *Mammoth Lakes Municipal Code* (Municipal Code) consists of all the regulatory and penal ordinances and administrative ordinances of the Town of Mammoth Lakes. It is the method the Town uses to implement control of land uses, in accordance with General Plan goals and policies. The *Mammoth Lakes Zoning Ordinance*, Title 17, of the Municipal Code identifies land uses permitted and prohibited according to the zoning category of particular parcels. Municipal Code Title 15, *Buildings and Construction*, specifies rules and regulations for construction, alteration, and building for uses of human habitation.

1.5 PROJECT DESCRIPTION

The proposed project, as modified, involves constructing a sprung structure over the proposed ice rink/RecZone, inclusive of the complementary community center, in lieu of the previously proposed pitched roof structure and standalone community center. The original roof structure was designed as a partially enclosed (open to the south and east), 35-foot structure that covers the ice rink/RecZone and proposed viewing areas and bleachers; refer to Exhibit 3.

The proposed sprung structure is entirely enclosed and taller than the pitched roof structure, which would allow the sprung structure to cover all proposed indoor multi-use facilities (including the community center on a mezzanine floor); refer to Exhibit 4, *Preliminary Site Plan*. The approximately 56-foot sprung structure would enclose the ice rink/RecZone; the dressing rooms and bleachers to the north; lobby, concessions area, skate/equipment area, restrooms, storage and mechanical rooms to the east; and the zamboni, skate sharpening, and mechanical/electrical maintenance room to the west. Elevations and conceptual renderings of the sprung structure are illustrated on Exhibit 5, *Sprung Structure Elevations*, and Exhibit 6, *Conceptual Renderings*.

Table 1, *Proposed Ice Rink/RecZone Roof Structure Comparison*, compares the structural differences between the original pitched roof structure to the proposed sprung structure. Additionally, Exhibits 7, *Conceptual Massing – Approved Project (Pitched Roof Structure)*, and 8, *Conceptual Massing – Proposed Project (Sprung Structure)*, illustrate massing comparisons of the two roof structures.

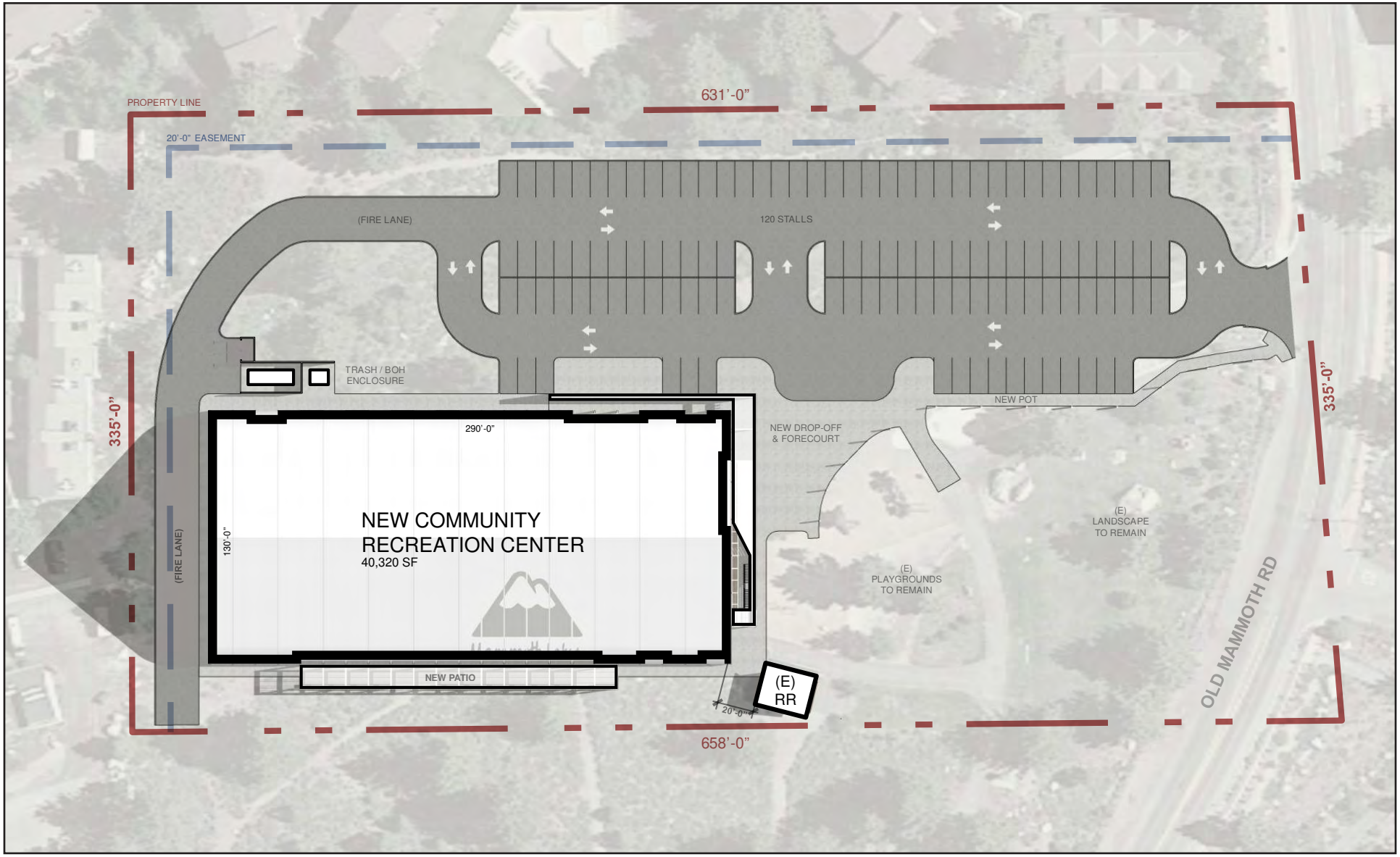
Table 1
Proposed Ice Rink/RecZone Roof Structure Comparison

Characteristics	Approved Project (as analyzed in 2017 EIR)	Proposed Project
Roof Structure	Pitched Roof Structure	Sprung Structure
Enclosure	Partially (open to south and east)	Entirely Enclosed
Height	35 feet	56 feet
Dimensions	43,000 square feet	40,320 square feet
Setback from Existing Residences to West	90 feet	50 feet

The previously proposed 13,000-square foot standalone community center is no longer proposed; instead, a 2,500-square foot community center would be housed in a mezzanine floor within the sprung structure. The community center would include a warming kitchen; ADA-accessible restrooms; and storage rooms and associated amenities for hosting community events and meetings.

Given that the proposed sprung structure would enclose all proposed accessory uses associated with the ice rink/RecZone, resulting in a smaller setback to the west, the previously proposed active outdoor recreation area to the west of the ice rink/RecZone would not be developed and could be developed in the area to the north of the ice rink/RecZone in the future. Under the proposed project, the area west of the ice rink/RecZone would be utilized as a fire access lane to connect to Meadow Lane.

No other changes are proposed to the other project components, park playground, surface parking lot, landscaping, and utility connections.



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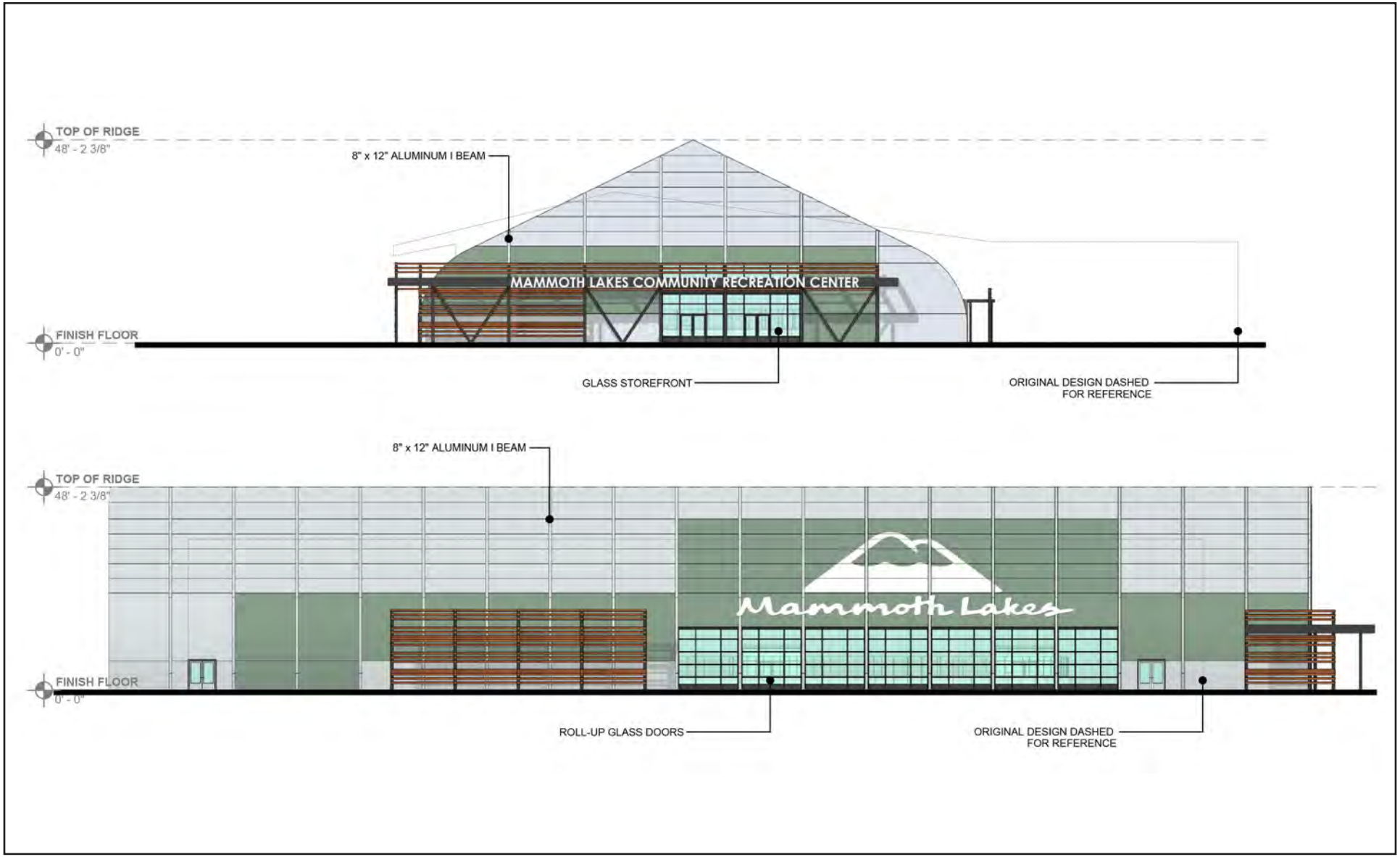
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ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Preliminary Site Plan

Exhibit 4



Source: HMC Architects, 2019.

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ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Sprung Structure Elevations

Exhibit 5



Source: HMC Architects, 2019.

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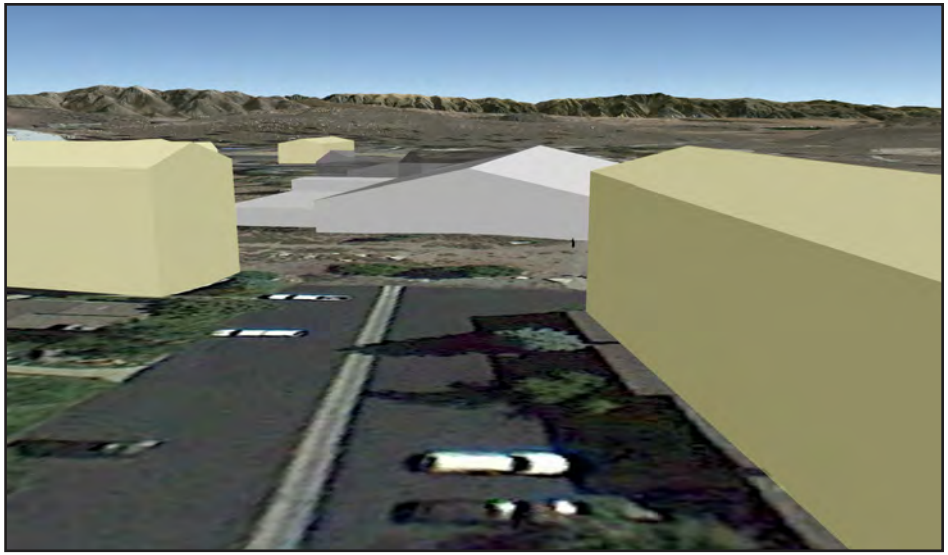
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MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Conceptual Renderings

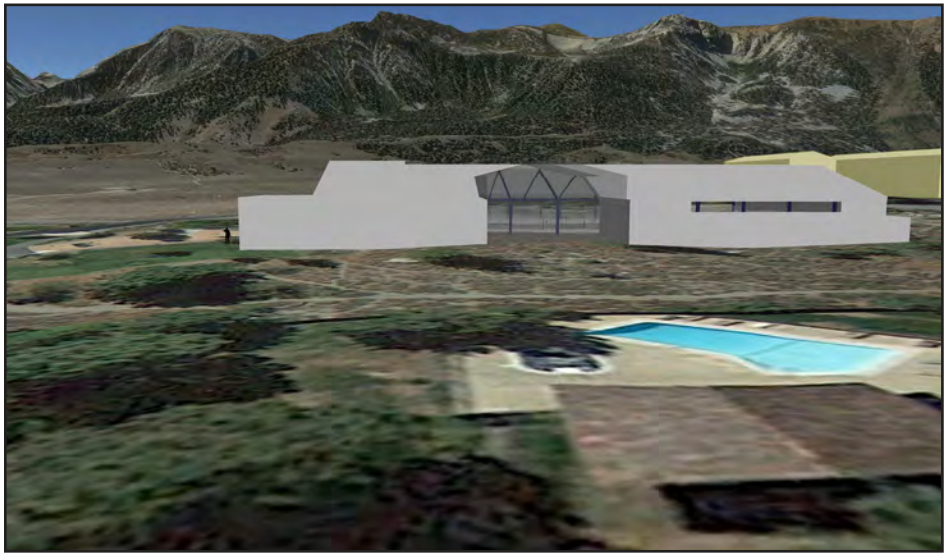
Exhibit 6



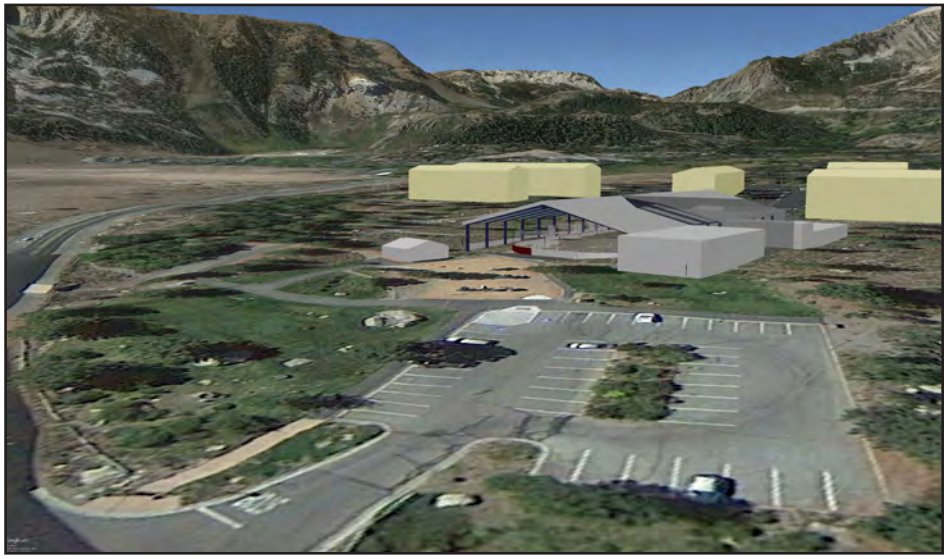
Perspective view looking northwest. Mammoth Creek Condominiums, La Vista Blanc Condominiums, Chateau Blanc #2 and Chateau de Montague Condominiums visible in the background.



Perspective view looking east from the terminus of Meadow Lane.



Perspective view looking south from near the pool area of the Chateau Blanc #2 Condominiums.



Perspective view looking southwest near Old Mammoth Road. La Vista Blanc and Mammoth Creek Condominiums visible in the background.

- Buildings that are located off-site.

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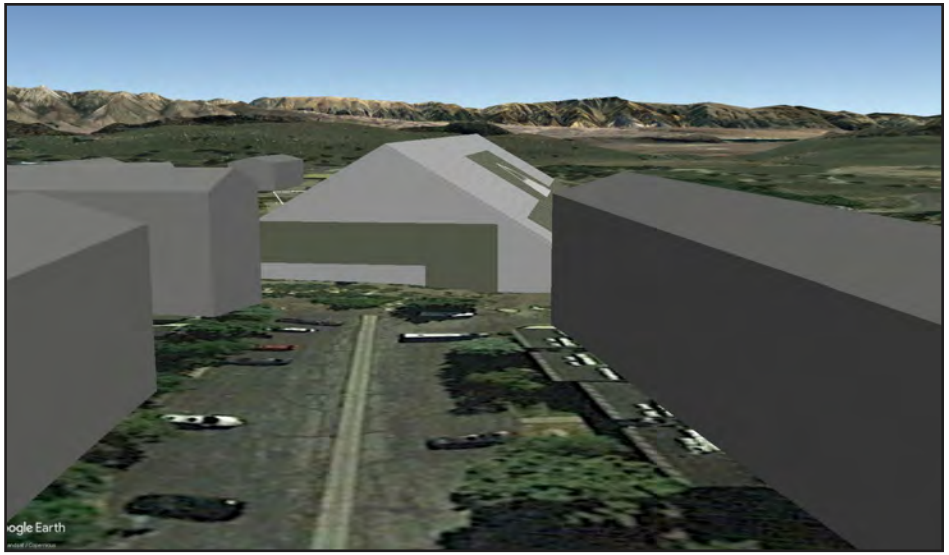
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MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Conceptual Massing – Approved Project (Pitched Roof Structure)

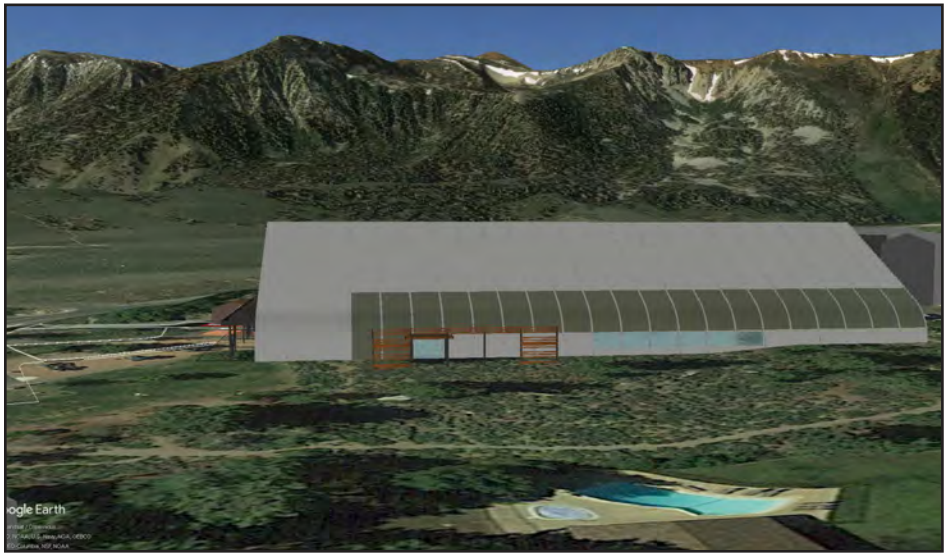
Exhibit 7



Perspective view looking northwest. Mammoth Creek Condominiums, La Vista Blanc Condominiums, Chateau Blanc #2 and Chateau de Montague Condominiums visible in the background.



Perspective view looking east from the terminus of Meadow Lane.



Perspective view looking south from near the pool area of the Chateau Blanc #2 Condominiums.



Perspective view looking southwest near Old Mammoth Road. La Vista Blanc and Mammoth Creek Condominiums visible in the background.

- Buildings that are located off-site.

NOT TO SCALE

Michael Baker INTERNATIONAL

10/19 | JN 174216

ENVIRONMENTAL IMPACT REPORT ADDENDUM
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES

Conceptual Massing – Proposed Project (Sprung Structure)

Exhibit 8

1.5.1 CHANGES AS COMPARED TO THE APPROVED PROJECT

As detailed above, this Addendum analyzes the potential environmental impacts associated with the development of a sprung structure over the proposed ice rink/RecZone in lieu of the pitched roof structure analyzed in the 2017 EIR. Structural differences associated with the two structures are detailed in Table 1.

Additionally, the topics of energy and wildfire, although considered, were not specifically identified pursuant to the current CEQA thresholds of significance in the previously certified 2017 EIR, as these topics were not a subject matter that required threshold evaluation pursuant to CEQA at that time. As such, this Addendum also analyzes the project's impacts in these topical areas.

1.5.2 PHASING/CONSTRUCTION

Given that the proposed sprung structure would enclose all proposed indoor multi-use facility uses, the project would be constructed in one phase and would occur for a duration of approximately 36 months (rather than in three phases for 69 months as analyzed in the 2017 EIR).

1.6 DISCRETIONARY ACTIONS

The Town of Mammoth Lakes is the Lead Agency under CEQA and has discretionary authority over the proposed project. The project would be subject to various Town permits and approvals, including, but not limited to:

- Adoption of the Addendum; and
- Major Design Review.

2.0 ENVIRONMENTAL CHECKLIST

2.1 BACKGROUND

1.	**Project Title:** Mammoth Creek Park West New Community Multi-Use Facilities EIR Addendum
2.	**Lead Agency Name and Address:** Town of Mammoth Lakes 437 Old Mammoth Road, Suite R Mammoth Lakes, California 93546
3.	**Contact Person and Phone Number:** Ms. Sandra Moberly Community and Economic Development Director 760.965.3630
4.	**Project Location:** The project site is located at Mammoth Creek Park West (686 Old Mammoth Road). The 4.9-acre site is bounded by multi-family residential uses and commercial uses to the north, Old Mammoth Road to the east, recreational open space to the south, and multi-family residential uses to the west; refer to Exhibit 2.
5.	**Project Sponsor's Name and Address:** Town of Mammoth Lakes Sandra Moberly, Community and Economic Development Director 437 Old Mammoth Road, Suite R Mammoth Lakes, California 93546
6.	**General Plan Designation:** Open Space (OS)
7.	**Zoning:** Public and Quasi Public (P-QP)
8.	**Description of the Project:** The proposed project involves constructing a sprung structure over the proposed ice rink/RecZone in lieu of the originally proposed pitched roof structure. The original approximately 43,000-square foot roof structure was designed as a partially enclosed (open to the south and east), 35-foot structure that covers the ice rink/RecZone and proposed viewing areas and bleachers. The proposed sprung structure is entirely enclosed, slightly smaller (40,320 square feet) and taller (up to 56 feet) compared to the pitched roof structure, which would allow the sprung structure to enclose all indoor multi-use facilities, including the community center facilities, which would be housed on an approximately 2,500-square foot mezzanine floor of the sprung structure; refer to Exhibits 4 through 8. As such, this Addendum analyzes the incremental environmental impacts associated with the proposed roof structure modification to those analyzed in the 2017 EIR.
9.	**Surrounding Land Uses and Setting:** Surrounding land uses consist primarily of commercial/office, multi-family residential, and open space/recreational uses; refer to Section 1.2.1, *Environmental Setting*.
10.	**Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement).** • Lahontan Regional Water Quality Control Board

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3.0 ENVIRONMENTAL ANALYSIS

This section describes the environmental impacts of the proposed project as compared to those identified in the 2017 EIR and discusses any substantial changes to existing conditions or regulatory setting since the 2017 EIR was certified. The issue areas evaluated in this document include the following, pursuant to Appendix G of the CEQA Guidelines, and have been modified to evaluate the proposed project changes for which an EIR has been previously certified to assist in the determination of the need for a supplemental EIR or an Addendum.

In December 2018, the Natural Resources Agency amended the CEQA Guidelines, which included modifications to Appendix G, *Environmental Checklist Form*. As such, the following analysis identifies where modifications to the Appendix G topical areas and thresholds have been added and/or updated since the 2017 EIR was prepared.

The modified Initial Study checklist, comparing the effects of the project modifications to those analyzed in the 2017 EIR, is found in Appendix A, *Modified Initial Study Checklist*.

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

A summary of the project and the 2017 EIR mitigation measures imposed is provided along with an analysis of the potential impacts resulting from the proposed project and whether those impacts substantially exceeds those discussed in the certified 2017 EIR.

3.1 AESTHETICS

This section corresponds with 2017 EIR Section 5.2, *Aesthetics/Light and Glare*, and Section 8.0, *Effects Found Not To Be Significant*.

Except as provided in Public Resources Code Section 21099, would the project:

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

As detailed in the 2017 EIR, the project site is located within the viewshed of Mammoth Mountain, the Sherwin Range, and Mammoth Crest, which are identified as visual resources by the General Plan.

The Town's General Plan and Municipal Code do not protect private views. Thus, no impacts were identified concerning private views. However, the General Plan protects designated public views. Specifically, these designated public views include the following:

- Motorists, bicyclist, and pedestrians traveling southbound on Old Mammoth Road (to the northeast and east of the project site);
- Pedestrians and bicyclists using the Town Loop Trail (to the south and east of the project site); and;
- Mammoth Creek Park West users (at the project site).

Due to the proposed setbacks, massing, and scale of the new multi-use facilities structure, the 2017 EIR determined that existing views of the Sherwin Range, Mammoth Crest, and Mammoth Mountain would not be obstructed. The 2017 EIR also determined that the approved project's design would allow for increased public views of the Sherwin Range and Mammoth Crest to the south from the proposed structure. Therefore, impacts were determined to be less than significant.

The proposed sprung structure would be entirely enclosed and slightly smaller (40,320 square feet) but taller (up to 56 feet) than the pitched roof structure proposed under the 2017 EIR; refer to Exhibit 7.

Southbound Old Mammoth Road. As indicated in the 2017 EIR, although views from Old Mammoth Road include views to the Sherwin Range and Mammoth Crest, views of these resources particularly at the project site are mostly obstructed as a result of existing mature pine trees that extend over 56 feet in height and surrounding residential development that extend up to 40 feet in height and are situated at a higher elevation than the proposed project; refer to Exhibit 6. Implementation of the proposed project would result in an approximately 56-foot structure, setback approximately 220 feet west from Old Mammoth Road. As depicted on Exhibit 7, the overall massing and scale of the proposed sprung structure would result in nominal view blockage of these visual resources as seem from southbound Old Mammoth Road, as these resources are mostly obstructed as a result of existing mature pine trees and surrounding residential development that is situated at a higher elevation than the proposed project. Impacts in this regard would be less than significant.

Town Loop Trail. As indicated in the 2017 EIR, western views of Mammoth Mountain and southwestern views toward the Sherwin Range and Mammoth Mountain along Town Loop Trail are mostly obstructed as a result of existing mature pine trees and surrounding residential development. As the trail is situated to the south of the project site, and scenic views are westward, development of the proposed project would not result in view obstruction of these resources. Thus, impacts in this regard would be less than significant.

Mammoth Creek Park West. As indicated in the 2017 EIR, the project site currently provides partial sporadic scenic views of the Sherwin Range and Mammoth Crest to the south, and Mammoth Mountain to the west from the existing Mammoth Creek Park West facility. Based on the enclosed nature of the proposed project, the revised project design would not allow for increased public views of the Sherwin Range and Mammoth Crest to the south from the sprung structure. However, public views at the project site toward these resources are currently sporadic as a result of existing mature pine trees both at the project site and in the vicinity. As a result, the overall massing and scale of the

proposed sprung structure would not result in significant view blockage of these visual resources as seen from Mammoth Creek Park West. Impacts would be less than significant in this regard.

Due to the proposed setbacks, massing, and scale of the proposed sprung structure, the proposed project would not result in a considerable incremental impact on designated public views within the project area. As discussed, existing visual resources are mostly obstructed as a result of existing mature pine trees that extend over 56 feet in height and surrounding residential development that extend up to 40 feet in height and are situated at a higher elevation than the proposed project. Therefore, the proposed project would result in less than significant impacts and would not result in substantially greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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

As detailed in the 2017 EIR, no State scenic highways are located adjacent to the project site. However, State Route 203 (SR-203) (Main Street), located approximately 0.73-mile north of the project site (trending in an east/west direction), is eligible to become a State Scenic Highway, but has not yet been officially designated. The nearest Officially Designated State Scenic Highway is U.S. Route 395 (Highway 395), located approximately 2.8 miles to the east of the project site. Views of the project site are not afforded from SR-203 or Highway 395 due to intervening structures, topography, and vegetation. As such, the proposed project would similarly have no impact in this regard and would not result in substantially greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analyses on page 5.2-9 and 5.2-13 of the 2017 EIR.

Concerning short-term impacts to visual character and quality, the 2017 EIR concluded that project construction associated with the approved project would temporarily disturb the character of the site,

affecting the quality of the landscape during this time. The 2017 EIR determined that short-term impacts to the site's existing visual character/quality would be reduced to less than significant levels with implementation of Mitigation Measures AES-1 and AES-2, which require screening of construction staging areas and a construction hauling plan.

Concerning long-term impacts to visual character and quality, the 2017 EIR determined that, although the approved project would increase the active recreational uses at the project site (including construction of a new 35-foot structure), existing views toward visual resources would at Mammoth Creek Park West would be expanded. Proposed landscaping would be required to meet Municipal Code requirements, including tree replacement. Further, the proposed 35-foot structure would be similar in visible massing to the existing buildings in the surrounding area (which range in height from 15 to 40 feet). Last, the proposed project would be consistent with the recreational intent of the site, and would comply with the existing OS land use designation and PQP zoning for the site. With implementation of the recommended Mitigation Measure BIO-1, which requires tree replacement at a ratio determined by the Community and Economic Development Director, and the Town's Municipal Code, including compliance with the Town's Design Review process, the approved project's long-term impacts pertaining to the degradation of character/quality would be reduced to less than significant levels.

The project site is surrounded to the north and west by commercial/office and multi-family residential uses and open space/recreational trail uses to the east and south. Based on the project's location on the urban fringe, the project is analyzed based on its potential to impact visual character/quality and conflict with applicable zoning and other regulations governing scenic quality. The proposed project would involve reduced construction-related impacts than identified in the 2017 EIR based on the proposed project's reduced construction duration and elimination of phasing. Concerning long-term impacts to visual character/quality, similar to the pitched roof structure proposed under the approved project, the proposed sprung structure would not conflict with the General Plan, Municipal Code, or Parks and Recreation Master Plan policies; refer to Section 3.11, *Land Use and Planning*. While the approximate 56-foot sprung structure would be taller than the original 35-foot roof structure, it would be similar in height to existing mature pine trees that extend over 56 feet in height and surrounding residential development that extend up to 40 feet in height and are situated at a higher elevation than the proposed project; refer to Exhibit 6 and Exhibit 8. Additionally, while the larger structure would be slightly closer to the existing residences to the west (50 feet rather than 90 feet), the side yard setback for P-QP zoning districts is 20 feet and thus, would be adequately met by the project's 50-foot setback; refer to Exhibit 4. The proposed project would also similarly require a major design review. As such, long-term impacts to visual character/quality would not be substantially greater than previously analyzed in the 2017 EIR and the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and underlined for new inserted text.

AES-1 Construction equipment staging areas shall be screened (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material, when feasible. Staging locations shall be indicated on Final Development Plans and Grading Plans.

AES-2 The construction hauling plan shall be prepared and approved by the Public Works Director prior to issuance of grading permit. The plan shall, at a minimum, indicate the equipment and vehicle staging areas, stockpiling of materials, and haul route(s). Identified haul route(s) must avoid residential areas to the maximum extent practical, thus, ensuring that construction haul routes minimize impacts to sensitive uses in the Town.

Refer also to 2017 EIR Mitigation Measure BIO-1, described in Section 3.4, *Biological Resources*.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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

The 2017 EIR concluded that project implementation would result in less than significant impacts related to light and glare following compliance with the allowable construction hours and exterior lighting requirements identified in the Town's Municipal Code and Mitigation Measures AES-3 and AES-4. Mitigation Measure AES-3 would require all construction-related nighttime security lighting, if necessary, to be oriented downward and away from adjacent residential uses. Mitigation Measure AES 4 would require a non-reflective finish to be applied to building materials, including the roof structure.

The proposed project would comply with the allowable construction hours and exterior lighting requirements identified in the Town's Municipal Code and Mitigation Measures AES-3 and AES-4 and would not generate additional daytime or nighttime illumination beyond what was previously analyzed in the 2017 EIR. Impacts would be less than significant.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and underlined for new inserted text.

AES-3 All construction-related lighting fixtures (including portable fixtures) shall be oriented downward and away from adjacent residential areas. Lighting shall consist of the minimal wattage necessary to provide safety at the construction site. A construction safety lighting plan shall be submitted to the Community and Economic Development ~~Manager~~Director for review concurrent with Grading Permit application.

AES-4 Prior to issuance the Building Permit, the Town shall identify on the building plans that potential reflective building materials (e.g., the roof and windows) shall use a non-reflective finish.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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?***

As detailed in the 2017 EIR, the project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Thus, similar to the approved project, the proposed project would not convert important farmland to non-agricultural use. No impacts would occur, and the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

The project site is not zoned for agricultural use nor is it under a Williamson Act contract. Therefore, development of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur, and the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

Although the project site is located within an area known for its forest land, the project site is not zoned for forest land, timberland, or timberland production use. Therefore, the proposed project would not conflict with such zoning and would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

The project site is located within an area of known forestland, and the adjoining parcel to the south is owned by the USFS. Forestry operations do not occur at the project site or in the project vicinity. As a result, implementation of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

Refer to Responses 3.2 (a) through 3.2(d). Implementation of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.3 AIR QUALITY

This section corresponds with 2017 EIR Section 5.6, *Air Quality*, and Section 8.0, *Effects Found Not To Be Significant*.

Where available, the significance criteria established by the applicable air quality management district 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?

The Town is located within the Great Basin Valleys Air Basin (Basin), which is governed by the Great Basin Unified Air Pollution Control District (GBUAPCD). The applicable GBUAPCD air quality plans are the *Air Quality Management Plan for the Town of Mammoth Lakes* (1990 AQMP) and the *Air Quality Maintenance Plan and PM_{10} Redesignation Request for the Town of Mammoth Lakes* (2014 AQMP), an update to the 1990 AQMP. The modeling analysis included in the 2014 AQMP is based on growth projections from the Town's General Plan. Thus, the 2017 EIR determined that implementation of the approved project would not conflict with 2014 AQMP since it would be consistent with the existing OS land use designation anticipated by the General Plan. Compliance with applicable General Plan policies would further reduce impacts associated with plan consistency to a less than significant level.

Similar to the pitched roof structure proposed under the approved project, the proposed sprung structure would be consistent with the site's General Plan land use designation. Therefore, the proposed minor modifications to the approved project previously analyzed as part of the 2017 EIR would not conflict with the 2014 AQMP. Implementation of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional new mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) 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?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.6-19 of the 2017 EIR.

Short-Term Construction Impacts

As detailed in the 2017 EIR, mitigation measures would reduce impacts related in exceedances of National Ambient Air Quality Standards (NAAQS) through application of proper permits and by demonstrating that the appropriate control measures would be utilized during construction activities. With implementation of Mitigation Measures AQ-1 through AQ-3, the approved project would

comply with all applicable GBUAPCD Rules and the project's cumulative contribution would be less than significant in this regard.

The proposed project would construct a sprung structure over the proposed recreational uses rather than a pitched roof structure. The active outdoor recreation area would also be eliminated under the proposed project (to be replaced with a fire access lane). These minor modifications to the approved project would not result in greater short-term construction impacts beyond those analyzed in the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project.

Long-Term Operational Impacts

The 2017 EIR concluded that the approved project would not result in long-term air quality impacts, as emissions would not exceed applicable operational thresholds. The approved project would be consistent with what is anticipated by the Town's General Plan and Zoning Code. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the 2017 EIR determined that the approved project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, cumulative operational impacts associated with implementation of the approved project would be less than significant.

Development of the proposed project would not result in substantially greater cumulatively considerable net increases of criteria pollutants than what was analyzed in the 2017 EIR. The minor modifications to the approved project would not result in greater long-term operational impacts beyond those analyzed in the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

AQ-1 Prior to approval of the project plans and specifications, the Public Works Director, or designee, shall confirm that the plans and specifications stipulate that, in compliance with GBUAPCD Rule 401, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures, as specified in the GBUAPCD Rules and Regulations. In addition, GBUAPCD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered to prevent excessive amounts of dust;
- On-site vehicles' speed shall be limited to 15 miles per hour (mph);
- All on-site roads shall be paved as soon as feasible or watered periodically or chemically stabilized;

- All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust; watering, with complete coverage, shall occur at least twice daily, preferably in the late morning and after work is done for the day;

- If dust is visibly generated that travels beyond the site boundaries, clearing, grading, earth moving or excavation activities that are generating dust shall cease during periods of high winds (i.e., greater than 25 mph averaged over one hour) or during Stage 1 or Stage 2 episodes; and

- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.

AQ-2 Under GBUAPCD Rule 200-A and 200B, the Contractor shall apply for a Permit To Construct prior to construction, which provides an orderly procedure for the review of new and modified sources of air pollution.

AQ-3 Under GBUAPCD Rule 216-A (New Source Review Requirement for Determining Impact on Air Quality Secondary Sources), the Contractor shall complete the necessary permitting approvals prior to commencement of construction activities.

Mitigation Measures: No additional new mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

c) Expose sensitive receptors to substantial pollutant concentrations?

A project could have the potential to expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute substantially to elevated pollutant concentration levels or place the project in an area with elevated pollutant concentrations. As detailed in the 2017 EIR, existing sensitive receptors in the project vicinity include multi-family residential homes, resort condominiums, hotels, recreational trails, and a place of worship. Construction operations would generate particulate (fugitive dust) and exhaust emissions that could impact nearby sensitive receptors; however, mitigation measures would reduce emissions to less than significant levels. Additionally, operations of the approved project would result in less than significant impacts concerning localized emissions impacts or exposure of sensitive receptors to substantial pollutant concentrations.
Development of the proposed project would not increase pollutant concentrations in a manner that would impact nearby sensitive receptors to a greater degree than what was analyzed in the 2017 EIR. The minor modifications to the approved project would not result in greater impacts to sensitive receptors beyond those analyzed in the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measures AQ-1 through AQ-3.

Mitigation Measures: No additional new mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis included on page 8-2 of the 2017 EIR.

The 2017 EIR concluded that construction activity associated with the approved project may generate detectable odors from heavy-duty equipment exhaust; however, these odors would be short-term in nature and cease upon project completion. The approved project did not involve any land uses typically associated with odor complaints (i.e., agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding). Less than significant impacts were identified in this regard.

The proposed project involves replacing the previously proposed pitched roof structure with a sprung structure and replacing the active outdoor recreation area to the west of the ice rink/RecZone with a fire access lane. Implementation of these project modifications would not result in greater impacts to other emissions (such as those leading to odors adversely affecting a substantial number of people) beyond those analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional new mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.4 BIOLOGICAL RESOURCES

This section corresponds with 2017 EIR Section 5.3, *Biological Resources*, and Section 8.0, *Effects Found Not To Be Significant*.

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?

As detailed in the 2017 EIR, the project site does not provide suitable habitat for special-status plant species known to occur in the general vicinity of the project site. As such, no impacts to special-status plant species would occur. Although not observed on-site, 20 special-status wildlife species have been recorded by the California Natural Diversity Database (CNDDB) in the project area. The 2017 EIR determined that the project site has a low potential to support northern goshawk (*Accipiter gentilis*), silver-haired bat (*Lasionycteris noctivagans*), long-eared myotis (*Myotis evotis*), and Yuma myotis (*Myotis yumanensis*). All remaining special-status wildlife species are presumed to be absent from the project

site based on habitat requirements, availability, and quality of habitat needed by each species and known distributions. It was determined that the project site has a low potential to provide suitable edge foraging habitat for these species, but is not a primary foraging area for these species. Less than significant impacts were identified in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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 U.S. Fish and Wildlife Service?

According to the 2017 EIR, the project site does not contain riparian habitat. The closest riparian habitat is located along the Mammoth Creek, approximately 240 feet south of the project site. Based the design plan analyzed as part of the 2017 EIR, development of the approved project would not result in impacts to Mammoth Creek. A less than significant impact was identified in this regard.

Based on the presence of Jeffrey pine and lodgepole pine on-site, the 2017 EIR concluded that the project would be required to prepare a tree removal and protection plan that is consistent with Municipal Code Section 17.36.140 if tree removal was proposed; refer to Mitigation Measure BIO-1. Adherence to Municipal Code Section 17.36.140 and implementation of Mitigation Measure BIO-1 would reduce impacts in this regard to a less than significant level.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

BIO-1 A detailed tree removal and protection plan shall be submitted to Community and Economic Development ~~Manager~~<u>Director</u> by the project Contractor, depicting all trees to be preserved and/or removed on the site. The Contractor shall develop the tree removal and protection plan to avoid impacts to on-site Jeffrey pine and lodgepole pine trees. The project Contractor shall follow the recommended guidelines in the General Plan and Municipal Code, which include the following:

- All site development shall be designed to avoid and preserve significant groups of trees and large trees as determined by the project Biologist and approved by the Community and Economic Development ~~Manager~~Director.

- Removal of native trees shall be mitigated at a ratio determined by the Community and Economic Development ~~Manager~~Director. If replacement plantings of the removed trees is required, the minimum replacement tree size shall be seven gallons. Further, replacement shall be limited to plantings in areas suitable for tree replacement with species identified in the Town of Mammoth Lakes' Recommended Plant List. Replacement requirements may also be determined based on the valuation of the tree as determined by a Registered Professional Forester or arborist.

- A tree removal and protection plan shall be developed by the project Biologist and submitted to the Community and Economic Development ~~Manager~~Director. The landscape plan shall also limit the use of turf over root zones of native trees to avoid or minimize adverse impacts of excessive water to native trees.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

c) Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-3 of the 2017 EIR.

The 2017 EIR determined that the project site does not support drainage or wetland features as defined by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or California Department of Fish and Wildlife (CDFW). No impacts were identified in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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?

The 2017 EIR determined that the project site is not located within any local or regional designated migratory corridors or linkages. However, Mammoth Creek has the potential to provide west to east wildlife movement opportunities along the riparian corridor associated with the creek from the mountains to the valley floor. According to the 2017 EIR, implementation of the approved project would not impact Mammoth Creek and is not anticipated to disrupt or have any adverse effects on potential wildlife movement along Mammoth Creek due to its distance from the project site. As a result, the 2017 EIR determined that impacts involving wildlife movement would be less than significant. However, the plant community found on the western half of the project site provides foraging habitat, nesting/denning sites, and shelter for wildlife including migrant and nesting bird species. As a result, the 2017 EIR includes Mitigation Measure BIO-2, which would require a pre-construction nesting bird clearance survey if construction cannot occur outside of the nesting season. With implementation of Mitigation Measure BIO-2, impacts were determined to be less than significant.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

BIO-2 Pursuant to the Migratory Bird Treaty Act (MBTA), Bald/Golden Eagle Protection Act, and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513), if the Town of Mammoth Lakes conducts all site disturbance/vegetation removal activities (such as removal of any trees, shrubs, or any other potential nesting habitat) outside the avian nesting season, December 1 through August 31, no further action is necessary. However, if ground disturbance/vegetation removal cannot occur outside of the nesting season, a pre-construction clearance survey for nesting birds shall be conducted within three days of the start of any ground disturbing activities to ensure that no birds are nesting on or within 500 feet of the project site. The biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active bird nests, including those on the ground, would occur during site disturbance activities.

If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside a buffer determined by the biologist in consultation with California Department of Fish and Wildlife (CDFW), or construction shall be delayed until the nest is inactive. The buffer shall also be and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. These buffers are typically 300 feet from the nests of non-listed, non-raptors and 500 feet from the nests of listed species or raptors. A biological monitor shall be retained and be present

during site disturbance activities in order to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, a monitoring report shall be prepared and submitted to the Applicant for review and approval prior to initiation construction activities within the buffer area. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds. Construction within the designated buffer area shall not proceed until written authorization is received by the Contractor from CDFW.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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

Refer to Response 3.3(b) above. The proposed project would be located on the same project footprint as analyzed by the 2017 EIR and would comply with all relevant General Plan policies in place to protect biological resources; refer to Section 3.11, *Land Use and Planning*. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure BIO-1.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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

The project site and surrounding vicinity are not located within an area covered by a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan. No impacts were identified in the 2017 EIR for this issue area.

Similarly, the proposed project would have no impact in this regard and no mitigation measures are required.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.5 CULTURAL RESOURCES

This section corresponds with 2017 EIR Section 5.4, *Cultural Resources*.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.4-17 of the 2017 EIR.

One previously recorded prehistoric archaeological site (CA-MNO-561) was identified within the project site as a result of the cultural resources records search and pedestrian survey. The portion of CA-MNO-561 to the south of the parking lot within the project site has been previously excavated and the site has been recommended eligible for listing in the California Register of Historic Resources (CRHR). In order to determine the potential for additional subsurface deposits associated with WA-MNO-561, a Phase II excavation was completed as part of the 2017 EIR to determine if the remainder of the project site provides contributing elements to the CRHR eligibility of CA-MNO-561 as a whole. Based on the results of the Phase II Cultural Study, the portion of the site CA-MNO-561 within the project site appears to have been previously disturbed, but retains some intact deposits. The Phase II Cultural Study concluded that the data potential of the portion of CA-MNO-561 within the project site has been exhausted. Any future work (i.e., data recovery) would only serve to produce redundant data. Additional constituents (i.e., artifacts) may remain within the project site, but the collected data thus far provide sufficient data to answer whether or not CA-MNO-561 is considered a historic resource. Any deposits that remain within the project site are unlikely to contribute additional pertinent data. Additionally, the 2017 EIR determined that portions of CA-MNO-561 located outside of the project site would not be impacted by the approved project. The portion of CA-MNO-561 within the boundaries of the project site does not contribute to the CRHR eligibility of the resource as a whole. Therefore, impacts to CA-MNO-561 as a result of the approved project were determined to be less than significant, as any such impacts would not affect the CRHR eligibility of the resource as a whole.

Although the data potential for the site has been exhausted by the Phase II investigation, the possibility for intact features (e.g., hearths, burials) within the project site remains. As a result, the 2017 EIR includes Mitigation Measure CUL-1, which would require archaeological and Native American monitoring during all project-related ground disturbing activities. With implementation of the recommended Mitigation Measure CUL-1, potential impacts to historical and archeological resources would be reduced to less than significant levels.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

CUL-1 Archaeological and Native American monitoring shall be conducted for all project-related ground disturbing activities by a qualified archaeologist and Native American monitor appointed by the Public Works Director. Archaeological monitoring shall be performed under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology. If intact features (e.g., hearths, other intact features, burials) are encountered during ground-disturbing activities, work in the immediate area shall halt, the monitors shall immediately notify the Public Works Director, and the find shall be evaluated for significance under the California Environmental Quality Act and National Historic Preservation Act (NHPA). Consultation with the Native American Monitor, the Native American Heritage Commission, and data/artifact recovery, if deemed appropriate, shall be conducted. Under the discretion of the monitors, work shall not be halted for resources that have already been extensively recorded within the site boundary. The monitors may reduce or stop monitoring dependent upon observed conditions. Work shall not be halted or redirected for known site constituents (i.e., flakes or stone tools) that were evaluated as part of the Phase II Cultural Resources Report, prepared by Rincon Consultants, Inc., dated September 28, 2016.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Refer to Response 3.5(a) above. The 2017 EIR concluded that the approved project's potential impacts to historical and archeological resources would be reduced to less than significant levels with implementation of the recommended Mitigation Measure CUL-1.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure CUL-1.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

c) Disturb any human remains, including those interred outside of formal cemeteries?

The 2017 EIR concluded that no conditions exist that suggest human remains are likely to be found on-site; however, development of the project site could result in the inadvertent discovery of human remains and potential impacts to these resources. If human remains are found, those remains would be required to conduct proper treatment, in accordance with applicable laws (State of California Public Resources Health and Safety Code Sections 7050.5 to 7055 and California Public Resources Code Section 5097.98). Following compliance with existing State regulations, impacts would be reduced to less than significant levels.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR and would be subject to conformance with applicable State regulations. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.6 ENERGY

This section corresponds with 2017 EIR Section 6.0, *Other CEQA Considerations*.

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Section 6.4, *Energy Conservation*, of the 2017 EIR analyzes the approved project's effect on consumption of energy resources. As concluded by the 2017 EIR, the increase in electricity usage as a result of the approved project would constitute an approximate 0.004 percent increase in the typical annual electricity consumption in Mono County. The project would not consume natural gas as all of the Town of Mammoth Lakes uses propane to fuel furnaces, water heaters, and stoves, etc. The increase in off-road automotive fuel consumption in Mono County would be nominal, while the on-road automotive fuel consumption from the project would be 0.003 percent. The approved project would be subject to applicable Federal, State, and local requirements for energy efficiency, including Title 24 standards, as well as project design features. As a result, the increase in electricity and automotive fuel consumption over existing conditions would be minimal and the project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand, or cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance, or preempt future energy development or future energy conservation.

The proposed project involves replacing the previously proposed pitched roof structure with a sprung structure and replacing the active outdoor recreation area to the west of the ice rink/RecZone with a fire access lane. Implementation of these project modifications would not result in greater consumption of energy resources than what was analyzed in the 2017 EIR. As noted above, the proposed project would be subject to applicable Federal, State, and local requirements for energy efficiency, including Title 24 standards, as well as project design features. Overall, implementation of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The 2017 EIR determined that the approved project would be subject to applicable Federal, State, and local requirements for energy efficiency, including Title 24 standards, as well as project design features. Further, the Town participates in the Eastern Sierra Energy Initiative (ESEI) with SCE and additional jurisdictions to reduce energy use and demand. The Town also implemented the High Sierra Energy Initiative (HSEI) in partnership with SCE to support a commitment to sustainable practices through energy efficiency, and will provide leadership and guidance in promoting, facilitating, and instituting such practices in the community.

The proposed project involves replacing the previously proposed pitched roof structure with a sprung structure and replacing the active outdoor recreation area to the west of the ice rink/RecZone with a fire access lane. Implementation of these project modifications is not expected to conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As stated above, the proposed project would be required to adhere to all Federal, State, and local requirements related to energy efficiency, including Title 24 standards as well as project design features. Overall, implementation of the proposed project would not result in greater impacts than previously identified in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.7 GEOLOGY AND SOILS

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

Would the project:

a) Directly or indirectly cause 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.

The 2017 EIR concluded that no active faults are located within the project site and the site is not within an Alquist-Priolo Earthquake Fault Zone. No impact would occur in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. As stated, no Alquist-Priolo Earthquake Fault Zones are located on-site. Thus, no impact would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

ii) Strong seismic ground shaking?

The 2017 EIR determined that the approved project would not result in substantial adverse effects to people or structures resulting from strong seismic ground shaking due to the relatively flat nature of the project site and its immediate surroundings. Following compliance with the Town's existing construction ordinances and the seismic design requirements identified in the California Building Code, no impacts would occur.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. Development of the proposed project would also be subject to the Town's existing construction ordinances and the seismic design requirements identified in the California Building Code. Thus, no impact would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

iii) Seismic-related ground failure, including liquefaction?

The 2017 EIR determined that the potential for liquefaction at the project site is considered very low. Further, the approved project would be required to comply with the State of California's minimum standards for structural design standards and construction identified in the California Building Code. No impacts were identified in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. As stated, the potential for liquefaction at the project site is very low. Development of the proposed project would also be subject to the California Building Code's minimum standards for structural design and construction. Thus, no impacts would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

iv) Landslides?

According to the 2017 EIR, no landslide activity has been recorded in the Town or the project site. No impacts were identified in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. As stated, no landslide activity has been recorded within the Town or the project site. Thus, no impacts would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

As concluded in the 2017 EIR, the project site is generally level and consists of Mammoth Creek Park West. Construction of the approved project would produce loose soils, which are subject to erosion if the surface area were to be disturbed or vegetation were to be removed. Grading and trenching for construction may expose soils to short-term wind and water erosion. The approved project would be subject to the Town Municipal Code requirements pertaining to the minimization of soil erosion during earthwork activities. Upon compliance with the Town Municipal Code, impacts pertaining to soil erosion and/or the loss of topsoil would be reduced to less than significant levels.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. Development of the proposed project would also be subject to the Town Municipal Code

requirements pertaining to the minimization of soil erosion during earthwork activities. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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?

Refer to Response 3.7(a)(iii). The 2017 EIR determined that potential impacts concerning seismic-related ground failure would be less than significant given the potential for liquefaction is considered very low and the approved project would comply with applicable California Building Code requirements for structural design and construction.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. Development of the proposed project would also be subject to applicable California Building Code requirements pertaining to structural design and construction. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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

Based on the General Plan EIR, no expansive soils have been mapped or encountered within the Town. Thus, no impacts were identified in the 2017 EIR.

Development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. No impacts would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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?

No septic tanks or alternative wastewater systems are currently located within the project site and none were proposed as part of the approved project. Thus, no impacts were identified in the 2017 EIR.

No septic tanks or alternative wastewater systems would be utilized by the proposed project. Therefore, no impacts are anticipated in this regard and the proposed project would not create greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Based on the General Plan EIR, there are no known unique paleontological resources or sites, and no known unique geologic features in the developable portion of the Town of Mammoth Lakes. Given the lack of potential for paleontological resources within or near the project site, the 2017 EIR determined that grading and construction activities for the approved project would not have the potential to result in significant adverse impacts to such resources. As such, no impact would occur in this regard.

Development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. No impacts would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.8 GREENHOUSE GAS EMISSIONS

This section corresponds with 2017 EIR Section 5.7, *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 the 2017 EIR, implementation of the approved project would result in direct and indirect project-related greenhouse gas (GHG) emissions. Direct project-related GHG emissions would occur as a result of construction activities and mobile sources. Indirect project-related GHG emissions would result from energy consumption, solid waste generation, and water demand. As the GBUAPCD has not adopted air quality criteria pollutant or GHG significance thresholds, the 2017 EIR utilizes Mojave Desert Air Quality Management District (MDAQMD) thresholds for criteria pollutants and the California Air Pollution Control Officers Association (CAPCOA) 900 metric tons of carbon dioxide equivalent per year ($MTCO_2eq/yr$) threshold for GHG emissions. The 2017 EIR determined that project-related emissions would be 426.46 $MTCO_2eq/yr$, which is below the 900 $MTCO_2eq/yr$ threshold. Therefore, impacts concerning GHG emissions were determined to be less than significant.

The proposed project would construct a sprung structure over the proposed recreational uses rather than a pitched roof structure. The active outdoor recreation area would also be eliminated under the proposed project (to be replaced with a fire access lane). The minor modifications to the approved project would not result in substantially greater GHG emissions beyond those analyzed in the 2017 EIR. Impacts would remain less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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

The Town does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, the Town implements the General Plan Mobility Element's goals, policies, actions, and infrastructure to achieve a progressive and comprehensive multimodal transportation system and participates in the Eastern Sierra Energy Initiative (ESEI) with SCE and additional jurisdictions to reduce energy use and demand. The Town also implemented the High Sierra Energy Initiative (HSEI) in partnership with SCE to support a commitment to sustainable practices through energy efficiency, and will provide leadership and guidance in promoting, facilitating, and instituting such practices in the community. As concluded in Response 3.8(a), the proposed project would not generate a significant amount of GHGs in an unmitigated condition. As a result,

the approved project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant in this regard.

As discussed, the minor modifications to the approved project would not result in greater GHG emissions beyond those analyzed in the 2017 EIR. As a result, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would remain less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.9 HAZARDS AND HAZARDOUS MATERIALS

This section corresponds with 2017 EIR Section 8.0, *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?

The 2017 EIR determined that the approved project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The approved project involves the construction of a residential community multi-use facility and no significant hazards to the public or environment are anticipated during the development of the project or the occupancy of the improvements due to requirements to comply with Building, Fire, and other Uniform Code statutes related to the protection of the public's health and safety. Less than significant impacts would occur in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. The proposed project would not result in significant hazards to the public or environment and would be designed and constructed in compliance with Building, Fire, and other Uniform Code statutes related to the protection of the public's health and safety. Less than significant impacts would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

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?

Based on the site's existing use and surrounding uses, the 2017 EIR determined that implementation of the approved project is not anticipated to result in accidental releases of hazardous materials As noted above, operation of the approved project would not involve the routine transport, use, or disposal of substantial quantities of hazardous materials. During operations, it is anticipated that strict standards implemented by the Mono County Health Department would be implemented, if necessary. No impacts would occur in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR and would not involve the routine transport, use, or disposal of substantial quantities of hazardous materials. Applicable Mono County Health Department Regulations would be implemented during project operations, if necessary. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

As detailed in the 2017 EIR, the nearest school to the project site is Mammoth High School, which is located approximately 0.34-mile northeast of the project site at 365 Sierra Park Road. Therefore, the project site is located more than one-quarter mile from the nearest school and no impacts would occur in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. As stated, no existing or proposed schools are located within one-quarter mile of the project site. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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?

The 2017 EIR determined that the project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and thus would not create a significant hazard to the public or the environment. Thus, no impacts would occur in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. As stated, the project site is not listed pursuant to Government Code Section 65962.5.[1] Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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 or excessive noise for people residing or working in the project area?

The project site is not located within an airport land use plan and is not located within two miles of an airport or private airstrip. Thus, the 2017 EIR determined that no impact would occur in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. As stated, the project site is not located within an airport land use plan or within two miles of an airport or private airstrip. Thus, development of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Based on the 2017 EIR, construction activities for the approved project could result in short-term temporary impacts to street traffic along Old Mammoth Road. While temporary lane closures may be

1 California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed August 29, 2019.

required, travel along surrounding roadways would remain open and would not interfere with emergency vehicle access in the site vicinity. The approved project does not conflict with the adopted *Town of Mammoth Lakes Emergency Operations Plan*. No impacts were identified in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. Although temporary lane closures may be required, the proposed project would not interfere with emergency vehicle access in the site vicinity and would not conflict with the adopted *Town of Mammoth Lakes Emergency Operations Plan*. Additionally, the project would replace the active outdoor recreation area to the west of the ice rink/RecZone with a fire access lane to connect to Meadow Lane, providing an additional access point for emergency vehicles (aside from Old Mammoth Road) to the project site. Thus, no impact would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-7 of the 2017 EIR.

As detailed in the 2017 EIR, the Town and surrounding area have been rated as having a very high fire potential. Thus, the 2017 EIR determined that implementation of the approved project could expose people or the new structure to risk involving wildland fires, as would be true for any development within the Town. The approved project would be subject to compliance with the Uniform Fire Code, which was amended by the Mammoth Lakes Fire Protection District (MLFPD) to ensure that Fire Code regulations are met. Impacts were determined to be less than significant in this regard.

The proposed project would not result in greater impacts than previously analyzed in the 2017 EIR. As stated, the Town and surrounding area have been rated as having a high fire potential. Like the approved project, the proposed project would be subject to compliance with the Uniform Fire Code, which was amended by the MLFD to ensure Fire Code regulations are met. Thus, less than significant impacts would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.10 HYDROLOGY AND WATER QUALITY

This section corresponds with 2017 EIR Section 5.9, *Hydrology and Water Quality*, and Section 8.0, *Effects Found Not To Be Significant*.

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The 2017 EIR concluded that implementation of the approved project would result in less than significant impacts related to the violation of water quality standards and degradation of water quality. Development would be subject to the National Pollutant Discharge Elimination System (NPDES) and Town Municipal Code requirements, in addition to Mitigation Measures HWQ-1 through HWQ-6. Mitigation Measure HWQ-1 would require preparation of a Notice of Intent to comply with the State of California General Permit. Mitigation Measure HWQ-2 would ensure the project conforms with the requirements of an approved Stormwater Pollution Prevention Plan (SWPPP). Mitigation Measure HWQ-3 would ensure a Notice of Termination (NOT) is submitted to the State Water Resources Control Board following project completion. Mitigation Measure HWQ-4 and HWQ-5 would ensure storm drainage routing and conveyance infrastructure components are implemented as part of the approved project and a Storm Drain Facilities Maintenance Plan is prepared to ensure continued efficiency of the proposed storm drain facilities. Mitigation Measure HWQ-6 would ensure a suite of Best Management Practices (BMPs) and Low Impact Development (LID) features are implemented to address the most likely sources of stormwater pollutants during project operation. With implementation of Mitigation Measure HWQ-1 through HWQ-6, impacts to surface or groundwater quality would be less than significant.

The proposed project would replace the pitched roof structure with a sprung structure and replace the active outdoor recreation area with a fire access lane. The proposed modification would not result in greater impacts than previously analyzed in the 2017 EIR. The mitigation measures from the 2017 EIR would also apply to the proposed project, and impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with project implementation. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

HWQ-1 Prior to Grading Permit issuance and as part of the project's compliance with the National Pollution Discharge Elimination System (NPDES) requirements, a Notice of Intent (NOI) shall be prepared and submitted to the State Water Resources Quality Control Board (SWRCB), providing notification and intent to comply with the State of California General Permit.

HWQ-2 The proposed project shall conform to the requirements of an approved Storm Water Pollution Prevention Plan (SWPPP) (to be applied for during the Grading Plan process)

and the National Pollution Discharge Elimination System (NPDES) Construction General Permit No. CAS000002 (2009-0009-DWQ [as amended by 2010-0014-DWQ and 2012-006-DWQ]), including implementation of all recommended Best Management Practices (BMPs), and utilize the Town of Mammoth Lakes Memorandum of Understanding (MOU) Resolution No. 6-91-926 issued by the State Water Resources Control Board.

HWQ-3 Upon completion of project construction, the Public Works Director shall submit a Notice of Termination (NOT) to the State Water Resources Quality Control Board to indicate that construction is completed.

HWQ-4 Prior to submittal of Grading Plans, the Town shall identify and implement a suite of storm drainage routing and conveyance infrastructure components designed to retain additional surface water flows prior to discharge. The design, sizing, and location of these drainage components shall be subject to review and approval by the Town. Implementation of this storm drainage infrastructure shall be approved by the Public Works Director and Town Engineer prior to the issuance of Grading or Building Permits.

HWQ-5 A Storm Drain Facilities Maintenance Plan (Maintenance Plan) shall be prepared by the Town prior to issuance of a Certificate of Occupancy in order to ensure continued efficiency of proposed storm drain facilities. Implementation of the Maintenance Plan shall be overseen by the Public Works Director. Particular items requiring maintenance include, but are not limited to, cleaning of the grates, removal of foreign materials from storm drainage pipes, maintenance, as necessary, to outlet facilities, and repairs, as necessary, to damaged facilities. Any storm drain pipe with a slope of less than 0.5 percent shall be identified and more frequent maintenance shall be performed to ensure efficiency of these low-incline facilities. Further, the Maintenance Plan shall ensure that snow removal activities conducted near proposed storm drain facilities do not restrict drainage collection in gutters, inlets, and flow paths.

HWQ-6 Prior to submittal of grading plans, the Public Works Director shall identify and implement a suite of stormwater quality Best Management Practices (BMP) and Low Impact Development (LID) features to address the most likely sources of stormwater pollutants resulting from operation of the proposed project. Pollutant sources and pathways to be addressed by these BMPs include, but are not necessarily limited to, parking lots, maintenance areas, trash storage locations, rooftops, interior public and private roadways, and storm drain inlets. The design and location of these BMPs shall generally adhere to the standards associated with the Phase II NPDES stormwater permit program. Implementation of these BMPs shall be assured by the Community & Economic Development ~~Manager~~Director and Town Engineer prior to the issuance of Grading or Building Permits.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-8 of the 2017 EIR.

As detailed in the 2017 EIR, the approved project would not result in any groundwater extraction or the depletion of groundwater supplies. Based on the approved project's Preliminary Drainage Study (Drainage Study), prepared by Triad/Holmes Associates, dated August 12, 2016 (included as Appendix 11.7, *Drainage Study*, of the 2017 EIR), the proposed impervious condition of the project site would be approximately 62.5 percent, leaving the remaining 37.8 percent of the project site pervious. Implementation of the proposed project would still allow infiltration at the project site. Thus, impacts in this regard were determined to be less than significant.

The minor modifications to the approved project still allow for infiltration at the project site and are not anticipated to result in an increase of impervious surfaces such that a substantial decrease in groundwater supplies would occur. The proposed project would not impede sustainable groundwater management of the basin. As a result, impacts to groundwater supplies would be less than significant and would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or rive or through the addition of impervious surfaces, in a manner that would:

i) Result in substantial erosion or siltation on- or off-site?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.9-23 of the 2017 EIR.

The 2017 EIR concluded that development of the approved project would include on-site storm drainage improvements such as inlets at low points, storm drain pipes, and swales as necessary. The stormwater that flows through the surface parking lot would be directed to an oil/water separator in the northeast corner prior to flowing into the proposed retention system, while stormwater runoff collected from building's roof would be directed to the retention system just southeast of the improvements. Two retention basins were proposed which would contain a 20-year intensity storm for 1 hour. According to the 2017 EIR, with implementation of the proposed storm drain facilities and compliance with Mitigation Measures HWQ-4 and HWQ-5, potential impacts associated with the increase in runoff, including potential increased erosion, would be reduced to less than significant levels.

The proposed project would replace the pitched roof structure with a sprung structure and replace the active outdoor recreation area with a fire access lane. The proposed modification would not result in greater impacts than previously analyzed in the 2017 EIR and would still be subject to compliance with Mitigation Measures HWQ-4 and HWQ-5, which would require installation of storm drain routing and conveyance infrastructure and implementation of a Storm Drain Facilities Maintenance Plan in order to ensure the continued efficiency of proposed storm drain facilities. As a result, impacts to groundwater supplies would be less than significant and would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measures HWQ-4 and HWQ-5.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.9-27 of the 2017 EIR.

Based on the 2017 EIR, a portion of the project site is located in an area that is classified by FEMA as a 100-year flood zone. However, areas currently inundated by the 100-year flood zone (the existing rock garden, access driveway, and vacant land in the northeast corner of the site), would remain upon completion of the approved project. The approved project would not result in the construction of any habitable structures within the 100-year flood zone. Additionally, runoff in excess of existing flows would be retained on-site in the proposed retention facilities and these facilities would be designed to withstand the 100-year storm flows. Thus, the 2017 EIR determined that the approved project would not place structures within a 100-year flood hazard area or impede or redirect flood flows such that people or property would be exposed to flooding. As such, impacts associated with flooding were determined to be less than significant.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. Thus, the minor modifications to the approved project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

iii) 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?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.9-23 of the 2017 EIR.

According to the 2017 EIR, buildout of the proposed project would increase peak flow rates in the 20-year storm event by 2.6 cubic feet per second and the 100-year storm event by 3.8 cubic feet per second above existing conditions. However, the approved project would attenuate increased runoff on-site prior to discharge. The approved project includes two retention basins which would contain a 20-year intensity storm for 1 hour. With implementation of the proposed storm drain facilities and compliance with Mitigation Measures HWQ-4 and HWQ-5, potential impacts associated with the increase in runoff would be reduced to less than significant levels.

Concerning stormwater quality, the 2017 EIR determined that impacts to water quality generated from project operation can be reduced through the implementation of proposed BMPs designed to protect water quality in receiving water bodies. The approved project includes BMPs that would be employed for the project, which include an oil/water separator and retention basins designed to filter runoff on the project site. The additional BMPs, if necessary, would be included upon finalizing grading/improvement plans (refer to Mitigation Measure HWQ-6).

Additionally, increased runoff can contribute to increased soil erosion. Soil erosion contributes to decreased water quality. However, as the approved project includes storm drain facilities that would filter runoff, soil erosion would be minimized through infiltration. The facilities would be finalized in the grading/improvement plans (refer to Mitigation Measure HWQ-4). Mitigation Measure HWQ-5 would also ensure that the storm drain facilities are properly maintained during operation. Compliance with the Mitigation Measures HWQ-4 through HWQ-6 would reduce potentially significant impacts on receiving water quality in Mammoth Creek resulting from project operation to acceptable levels. As such, impacts related to operational water quality were determined to be less than significant.

The proposed project would replace the pitched roof structure with a sprung structure and replace the active outdoor recreation area with a fire access lane. The proposed modification would not result in greater impacts than previously analyzed in the 2017 EIR and would still be subject to compliance with Mitigation Measures HWQ-4 through HWQ-6 in order to minimize operational impacts to water quality. As a result, impacts would be less than significant and would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure HWQ-4 through HWQ-6.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis in Section 8.0, *Effects Found Not To Be Significant*, of the 2017 EIR.

Based on the 2017 EIR, a portion of the project site is located in an area that is classified by FEMA as a 100-year flood zone. However, areas currently inundated by the 100-year flood zone (the existing rock garden, access driveway, and vacant land in the northeast corner of the site), would remain upon completion of the approved project. The approved project would not result in the construction of any habitable structures within the 100-year flood zone in this regard. According to the General Plan EIR, the Town is not located in an area that would be impacted by a tsunami. The impacts from mudflows are considered to be negligible given the varying topography and heavily vegetated nature of the Town. Further, the project site is not located within the vicinity of a water body that would cause inundation of the project site by a seiche. Thus, no impacts would result in this regard.

The proposed project would be located on the same project footprint as analyzed by the 2017 EIR. Thus, the minor modifications to the approved project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis in Section 5.1, *Land Use and Relevant Planning*, and Section 5.9, *Hydrology and Water Quality*, in the 2017 EIR.

According to the Sustainable Groundwater Management Act (SGMA) Basin Prioritization Dashboard, the project site is not located within an area covered by an established groundwater sustainability plan.[2] The *Water Quality Control Plan for the Lahontan Region, North and South Basins* (Basin Plan) includes policies and regulations for municipal wastewater, treatment, disposal, and reclamation. The Basin Plan also establishes specific erosion and sediment control guidelines for land developments within the Town. These standards are designed to provide developers with a uniform approach for the design and installation of adequate systems to control erosion and mitigate urban drainage impacts from the Town in an effort to prevent the degradation of waters of Mammoth Creek and Hot Creek. Under a MOU with the Lahontan RWQCB (MOU No. 6-91-926), the Town administers erosion control measures on a project by project basis to make sure that they are in place and operational.

2 California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed August 12, 2019.

The proposed project would be located on the same project footprint as analyzed in the 2017 EIR. Thus, the proposed project would not have the potential to conflict with or obstruct a sustainable groundwater management plan. Development of the proposed project would be required to comply with the water quality regulations detailed in the Basin Plan and would not conflict with or obstruct its implementation. Further, the proposed project would be required to prepare a project-specific SWPPP and implement water quality related BMPs during construction and operation; refer to Mitigation Measures HWQ-2 and HWQ-6. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: Refer to 2017 EIR Mitigation Measures HWQ-2 and HWQ-6.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

3.11 LAND USE AND PLANNING

This section corresponds with 2017 EIR Section 5.1, *Land Use and Relevant Planning*, and Section 8.0, *Effects Found Not To Be Significant*.

Would the project:

a) Physically divide an established community?

The project site is comprised of Mammoth Creek Park West near the edge of the Town's developed area. As such, the 2017 EIR concluded that the approved project would not physically divide an established community. Additionally, the proposed development (recreation uses) is consistent with the existing Public and Quasi Public (P-QP) zoning designation. The 2017 EIR concluded no impacts would occur.

The proposed sprung structure is one component of the overall community multi-use facilities and would not result in a physical barrier within an established community. The sprung structure would encompass the ice rink/RecZone and all proposed accessory uses. Similar to the approved project, no impacts would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.1-10 of the 2017 EIR.

The 2017 EIR determined that the approved project would be consistent with the General Plan goals and policies, Municipal Code, and *Town of Mammoth Lakes Parks and Recreation Master Plan* policies and standards.

Similar to the pitched roof structure proposed under the approved project, the proposed sprung structure would not conflict with the General Plan, Municipal Code, or Parks and Recreation Master Plan policies. It should be noted that there is no height limit in the P-QP zone; instead, building height is limited to the tree canopy height based on General Plan Policy C.2.X. Thus, while the approximate 56-foot sprung structure would be taller than the original 35-foot roof structure, it would still be lower than existing mature pine trees in the vicinity that extend over 56 feet in height and would be similar in visible massing to existing buildings in the surrounding area (which range in height from 15 to 40 feet); refer to Exhibits 6 and 8. Additionally, while the sprung structure would be slightly closer to the existing residences to the west (50 feet rather than 90 feet), the side yard setback for P-QP zoning districts is 20 feet and thus, would be adequately met by the project's 50-foot setback; refer to Exhibit 4. The proposed project would also similarly require a major design review. As such, the proposed project would be consistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be similar to those identified in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.12 MINERAL RESOURCES

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

Would the project:

a) Result in the loss of availability of a known mineral resource of value to the region and the residents of the state?

The 2017 EIR determined that no impacts to mineral resources would occur as no known mineral resources are known to exist within the project area. As the proposed project would occur within the same project boundary as the approved project, no impacts would result in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

Refer to Response 3.12(a). Impacts would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.13 NOISE

This section corresponds with 2017 EIR Section 5.8, *Noise*.

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analyses that begin on pages 5.8-18, 5.8-22, and 5.8-23 of the 2017 EIR.

Based on the 2017 EIR, the majority of construction activities associated with the approved project would occur at distances of 100 to 300 feet from the closest sensitive receptors (i.e., the La Vista Blanc Condominiums and the Chateau Blanc Condominiums). All construction activities would be required to adhere to maximum exterior noise levels pursuant to Municipal Code Section 8.16.090, *Prohibited Acts*. All mobile and stationary internal-combustion powered equipment and machinery are required to be equipped with suitable exhaust and air-intake silencers in proper working order under the Town's Noise Ordinance. The 2017 EIR also included Mitigation Measure NOI-1, which requires mobile equipment to be muffled and best management practices for hauling activities be implemented to reduce construction noise. In addition, Mitigation Measure NOI-1 requires a disturbance coordinator to respond to construction noise complaints and direct equipment away from sensitive receptors to further reduce construction-related noise. Thus, the 2017 EIR concluded construction-related noise impacts would be less than significant with mitigation incorporated.

Long-term mobile noise impacts associated with the approved project would result in a maximum increase of 0.1 dBA along Chateau Road, west of Old Mammoth Road. Therefore, impacts in this regard were determined to be less than significant.

Long-term operational noise impacts were modeled with the SoundPLAN three-dimensional noise model; refer to 2017 EIR Exhibit 5.8-3, *Recreational Noise Contours*. Noise contours associated with the worst-case recreational activities were modeled, which includes mechanical equipment (i.e., heating, ventilation, and air condition units, chillers, and pumps), recreational noise (i.e., community center

and outdoor ice rink/RecZone activities, park playground, active outdoor recreation area), event noise (i.e., crowds and amplified live or recorded music), and parking lot noise. Based on the Town's noise standards of 55 dBA in the daytime and 50 dBA at night for multi-family uses, the approved project's noise contours would not exceed the Town's maximum daytime and nighttime noise standards. Additionally, the 2017 EIR included Mitigation Measure NOI-2 and NOI-3, which limited operational hours of ice hockey and hockey tournaments to not occur past 10:00 p.m. and that a Noise Control Plan is prepared and implemented for future special events with live or recorded amplified music. Upon implementation of Mitigation Measures NOI-2 and NOI-3, the approved project would result in less than significant impacts with regards to long-term operational noise.

Construction of the proposed sprung structure would result in similar construction noise as the pitched roof structure. However, the proposed project would not be phased (like the approved project), thereby reducing the duration of construction noise in the site vicinity. Additionally, the sprung structure would not result in any additional long-term mobile or stationary noise impacts compared to that analyzed in the 2017 EIR.

Given that the sprung structure would be fully enclosed, rather than a partially enclosed pitched roof structure, noise associated with mechanical equipment, community center and ice rink/RecZone activities, the event noise would be reduced in comparison to that previously analyzed in the 2017 EIR (the original roof structure was designed as a partially enclosed [open to the south and east]). The structure would enclose the ice rink/RecZone; the dressing rooms and bleachers to the north; lobby, concessions area, skate/equipment area, restrooms, storage and mechanical rooms to the east; and the zamboni, skate sharpening, and mechanical/electrical maintenance room to the west. Additionally, the previously proposed active outdoor recreation area would not be implemented, which further reduces operational noise impacts. The proposed project would also be subject to the Town's Noise Ordinance and Mitigation Measures NOI-1 through NOI-3; however, as the structure is now enclosed operational noise impacts would be reduced and Mitigation Measure NOI-2 would be amended to extend the operating hours to 12:00 a.m. Mitigation Measure NOI-3 would also be amended to ensure any amplification systems are still subject to performance standards between the hours of 10:00 p.m. and 12:00 a.m. Overall, no new impacts have been identified and no new mitigation measures would be required. Impacts would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with the approved project. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

NOI-1 Prior to issuance of any Grading Permit or Building Permit for new construction, the Public Works Director, or designee, shall confirm that the Grading Plan, Building Plans, and specifications stipulate that:

- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State required noise attenuation devices.

- The Contractor shall provide a qualified "Noise Disturbance Coordinator." The Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Disturbance Coordinator shall notify the Town within 24-hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Public Works Director, or designee. The contact name and the telephone number for the Disturbance Coordinator shall be clearly posted on-site.

- When feasible, construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, schools, hospitals, etc.).

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- Construction activities that produce noise shall not take place outside of the allowable hours specified by the Town's Municipal Code Section 8.16.090 (7:00 a.m. and 8:00 p.m. Monday through Saturday; construction is prohibited on Sundays and/or federal holidays).

NOI-2 Prior to issuance of the certificate of occupancy for the new Community Multi-Use Facilities, the Town's Community Development and Economic ~~Manager~~Director shall ensure that operational hours of ice hockey and hockey tournaments at the ice rink and the active outdoor recreational area do not occur past ~~10:00 p.m.~~ 12:00 a.m. This limitation shall be enforced by the Parks and Recreation Director.

NOI-3 Prior to occupancy of the community center, the Town shall develop and implement a Noise Control Plan for event operations that have live or recorded amplified music. The Noise Control Plan shall contain the following elements:

- Amplified noise sources (e.g., speakers, bandstands, etc.) shall be located more than 160 feet from the project's western and northern boundaries. Speaker systems shall also be directed away from the nearest sensitive receptors.

- ~~Amplification systems that would be used during the daytime (7:00 a.m. to 10:00 p.m.) shall include and utilize a processor to control the maximum output that the speakers can reach. Noise levels during this period shall not exceed 82 dBA at 20 feet from the source. Activities permitted pursuant to Municipal Code Chapter 8.16.100 – Exemptions, shall not be subject to this limit. All other non-permitted activities shall be subject to the limits set forth in this mitigation measure.~~

- Amplification systems that would be used after 10:00 p.m. shall include and utilize a processor to control the maximum output that the speakers can reach. Noise levels during this period shall not exceed 78 dBA at 20 feet from the source.

Activities permitted pursuant to Municipal Code Chapter 8.16.100 – Exemptions, shall not be subject to this limit. All other non-permitted activities shall be subject to the limits set forth in this mitigation measure.

- The contact telephone number and email addresses of the appropriate Parks and Recreation Department representatives shall be posted at each facility entrance for neighbors to lodge noise complaints or other concerns. Complaints shall be addressed in a diligent and responsive manner.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

b) Generation of excessive groundborne vibration or groundborne noise levels?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.8-20 of the 2017 EIR.

As detailed in the 2017 EIR, groundborne vibration would be generated primarily during site clearing and grading activities on-site and by off-site haul truck travel. These activities would occur at distances of 50 feet or more from the closest sensitive receptors to the north and west (i.e., the La Vista Blanc Condominiums and the Chateau Blanc Condominiums). Additionally, the use of any vibratory compactor/rollers would not occur within 50 feet of the closest sensitive receptors because the proposed parking lot and community facilities are buffered from the sensitive receptors. Therefore, anticipated construction vibration levels of the approved project would not exceed the Federal Transit Administration's 0.2 inch-per-second peak particle velocity (PPV) significance threshold; refer to 2017 EIR Table 5.8-12, *Typical Vibration Levels for Construction Equipment*. Additionally, Section 8.16.090(B)(7) of the Municipal Code includes a threshold for the perception of groundborne vibration (0.01 inch-per-second PPV). Although the project site is approximately 50 feet from the closest receptors, the primary construction areas would be 100 feet away or more. As depicted in 2017 EIR Table 5.8-12, *Typical Vibration Levels for Construction Equipment*, vibration levels would be barely perceptible at this distance. In addition, per the Town's requirements, construction activities would occur between the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday. These activities would not occur during recognized sleep hours for residents. Therefore, construction activities associated with the approved project would not expose sensitive receptors to excessive groundborne vibration levels, and impacts were determined to be less than significant.

Construction of the proposed sprung structure would require similar construction equipment and be located the same distance from sensitive receptors (50 feet or more from condominium uses to the north and west). However, the proposed project would not be phased (like the approved project), thereby reducing the duration of construction vibration in the site vicinity. Construction of the proposed project would also be required to comply with the Town's requirements related to construction hours (7:00 a.m. and 8:00 p.m. Monday through Friday). Thus, groundborne vibration impacts associated with the approved project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) ***For a project located within the vicinity of a private airstrip 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?***

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-9 of the 2017 EIR.

The 2017 EIR determined that the project site is not located within the vicinity of a private airstrip, an airport land use plan area, or within two miles of a public airport or public-use airport. The Mammoth Yosemite Airport is located approximately six miles southeast from the project site. As such, the 2017 EIR concluded that no impacts would occur in this regard.

The proposed project is located within the same project boundary as the approved project. Thus, project development would not result in new impacts related to the exposure of people residing or working in the project area to excessive noise levels. No impacts would occur, and impacts would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: No Impact.

3.14 POPULATION AND HOUSING

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

Would the project:

a) ***Induce substantial unplanned 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)?***

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-9 of the 2017 EIR.

According to the 2017 EIR, the approved project would serve the existing Mammoth Lakes community and does not include any growth-inducing land uses. In addition, employees serving the

existing facilities would serve the approved project, resulting in only nominal increases in employees, if any. No impacts were identified in the 2017 EIR.

Replacing the originally proposed pitched roof structure with the sprung structure and eliminating the active outdoor recreation area component of the approved project would have no impact on population growth. Impacts would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-10 of the 2017 EIR.

No existing housing is present on-site. Thus, implementation of both the approved and proposed projects would not result in the displacement of existing housing. No impacts would result in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.15 PUBLIC SERVICES

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

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

i) Fire Protection?

The Mammoth Lakes Fire Protection District (MLFPD) provides fire protection and emergency response to the project site. The 2017 EIR determined that the approved project could result in an increase in emergency calls received by the MLFPD due to the increase in activity and use in the area. However, the approved project would comply with applicable fire protection provisions as set forth in the Municipal Code. While the approved project could result in an increase in calls, it would not

result in development that is unique in the area. The approved project would also be subject to review by the MLFPD to ensure compliance with applicable fire requirements. Therefore, with compliance with MLFPD requirements, approved project impacts were determined to be less than significant.

The proposed project would replace the pitched roof structure with a sprung structure and replace the active outdoor recreation area with a fire access lane connecting to Meadow Lane. The proposed modifications would not result in greater impacts to fire protection and emergency response services than that previously analyzed in the 2017 EIR. Additionally, similar to the approved project, the proposed project would be subject to MLFPD review and fire requirements, including those related to the proposed fire access lane on the western portion of the project site. Thus, impacts associated with the proposed project would be less than significant.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Police Protection?

Police protection and law enforcement in the Town are provided by the Mammoth Lakes Police Department, Mono County Sheriff's Department, and California Highway Patrol. The 2017 EIR concluded that the increase in visitors resulting from implementation of the approved project could result in a greater volume of emergency calls for police services and could potentially impact police protection and law enforcement services and facilities. However, the increase would be nominal as the approved project essentially is relocating the existing community facility and ice rink to the project site. Therefore, impacts were determined to be less than significant.

The proposed replacement of the pitched roof structure with a sprung structure over the ice rink/RecZone and replacement of the active outdoor recreation area with a fire access lane would not result in greater impacts related to police protection services than that previously analyzed under the 2017 EIR in this regard. Similar less than significant impacts would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) Schools?

The 2017 EIR determined that implementation of the approved project would not impact Mammoth Unified School District (MUSD) school facilities or services since no residential uses are proposed as part of the project. Similarly, the proposed project would not introduce new residential uses that could increase student population in the MUSD boundary. Thus, the proposed project would have

no impact on school services. Impacts would not be greater than that previously analyzed under the 2017 EIR in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No new additional mitigation measures are required.

Level of Significance: No Impact.

d) Parks?

As detailed in the 2017 EIR, the approved project would include active recreational opportunities, including a community center, ice rink/RecZone, and active outdoor recreation area. In addition, the existing park playground at Mammoth Creek Park West would be reconfigured and improved. As such, the approved project would provide Town residents access to new recreational opportunities, and impacts would be less than significant in this regard.

The proposed project would construct a sprung structure over the proposed recreational uses rather than a pitched roof structure. The active outdoor recreation area would also be eliminated under the proposed project (to be replaced with a fire access lane). Although the active outdoor recreation area would be eliminated, the project would still construct the ice rink/RecZone and community center facilities on-site. Further, these proposed modifications would not result in greater impacts to existing parks and recreational services compared to that of the approved project. Impacts would similarly be less than significant.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Other public facilities?

The 2017 EIR determined that as development associated with the approved project would serve the existing Mammoth Lakes community and does not include any growth-inducing land uses, there would be no increase in demand for other public facilities, including library services. Thus, impacts were determined to be less than significant in this regard.

The proposed sprung structure and replacement of the active outdoor recreation area with a fire access lane are not growth-inducing. Therefore, the proposed modifications to the approved project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.16 RECREATION

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

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?

Refer to Response 3.15(d). The proposed modification to the approved project does not include any residential land uses and the proposed community multi-use facilities would increase recreational services and amenities within the Mammoth Lakes community. Therefore, the proposed modifications to the approved project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant 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?

Refer to Response 3.15(d). Impacts would not be greater than that previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.17 TRANSPORTATION

This section corresponds with 2017 EIR Section 5.5, *Traffic and Circulation*, and Section 8.0, *Effects Found Not To Be Significant.*

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on pages 5.5-13 and 8-13 of the 2017 EIR.

According to the 2017 EIR, construction-related trips associated with trucks and employees traveling to and from the project site may result in minor traffic delays within the project area. In order to reduce the potential impact of construction-related vehicles interacting with pedestrians and local traffic, a construction management plan would be developed to implement a variety of measures to minimize traffic and parking impacts upon the local circulation system (Mitigation Measure TRA-1). The construction management plan would include, but not be limited to, the prohibition of construction worker parking along local streets, identification of appropriate haul routes to avoid traffic disruptions, and limitation of hauling activities to off-peak hours. Implementation of a construction management plan would ensure the approved project's short-term traffic impacts are reduced to less than significant levels.

Consistent with Town standards, the 2017 EIR traffic analysis evaluated a busy winter Saturday evening as the worst-case scenario design day. The 2017 EIR concluded that the approved project would generate a total of 210 net daily trips with 36 trips occurring during p.m. peak hour; refer to 2017 EIR Table 5.5.4, *Proposed Project Daily Trip Generation*, and Table 5.5-5, *Proposed Project P.M. Peak Hour Trip Generation*. All study intersections were determined to operate at an acceptable level of service based on the Town's performance criteria under existing with project and future with project conditions. Additionally, according to 2017 EIR Table 5.5-9, *Mammoth Creek Park West Vehicle Miles Traveled*, the approved project would generate a net increase of 387 vehicle miles traveled (VMT), which was determined to be a minimal increase of approximately 0.3 percent of existing VMT.

Implementation of the approved project could impact line of sight at the site driveway. Therefore, Mitigation Measure TRA-2 was included to ensure adequate drive sight distance would be provided on final landscaping plans. Overall, roadway circulation impacts were determined to be less than significant with mitigation incorporated.

As stated in the 2017 EIR, the approved project also would not conflict with adopted policies, plans, or programs supporting alternative transportation. Instead, the approved project would result in beneficial impacts related to travelers within the project vicinity, since the project proposes multi-use community and recreational facilities situated along multi-use pathways and in close proximity to major transit stops.

The proposed project involves construction of a sprung structure (rather than a pitched roof structure) and replacement of the active outdoor recreation area with a fire access lane connecting to Meadow Lane. These proposed modifications would not result in any change related to construction traffic, operational trip generation, impacts to roadway levels of service, or multimodal circulation systems. As stated in *Mammoth Multi-Use Facility Addendum Memorandum*, prepared by LSC Transportation Consultants, Inc. and dated August 20, 2019, the proposed project modifications would not affect the project's trip generation and traffic impact analysis prepared for the 2017 EIR; refer to Appendix B, *Traffic Validation Letter*. The proposed project would be required to implement Mitigation Measures TRA-1 and TRA-2 to reduce impacts regarding construction traffic and line of sight to less than significant levels. Overall, impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: The 2017 EIR includes mitigation measures to reduce potential impacts associated with the approved project. The following measures from the 2017 EIR are applicable to the proposed project. Any modifications to the original measures are shown in ~~strikethrough~~ for deleted text and <u>underlined</u> for new inserted text.

TRA-1 Prior to issuance of any grading and/or demolition permits, whichever occurs first, a Construction Management Plan shall be submitted for review and approval by the Public Works Director. The Construction Management Plan shall, at a minimum, address the following:

- Traffic control for any street closure, detour, or other disruption to traffic circulation.
- Identify construction vehicles haul routes for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.) to the site; necessary traffic controls and detours; and a construction phasing plan for the project.
- Identify any off-site construction staging or material storage sites.
- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.
- Require the Contractor to keep all haul routes clean and free of debris, including but not limited, to gravel and dirt as a result of its operations. The Contractor shall clean adjacent streets, as directed by the Town Engineer (or representative of the Town Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.
- The scheduling of hauling or transport of oversize loads shall avoid peak hour traffic periods to the maximum extent feasible, unless approved otherwise by the Town Engineer. No hauling or transport shall be allowed during nighttime hours or Federal holidays. All hauling and transport activities shall comply with Municipal Code Chapter 8.16, *Noise Regulation*.
- Haul trucks entering or exiting public streets shall at all times yield to public traffic.
- If hauling operations cause any damage to existing pavement, streets, curbs, and/or gutters along the haul route, the contractor shall be fully responsible for repairs. The repairs shall be completed to the satisfaction of the Town Engineer.
- All constructed-related parking and staging of vehicles shall be kept out of the adjacent public roadways and shall occur on-site.
- This Construction Management Plan shall meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD) as well as Town of Mammoth Lakes requirements.

TRA-2 Prior to issuance of any grading and/or demolition permits, whichever occurs first, final landscaping plans shall be submitted for review and approval by the Town Engineer to provide adequate drive sight distance at the site driveway.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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?[3]

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-12 of the 2017 EIR.

The 2017 EIR concluded that the project site is not subject to a Congestion Management Program (CMP). Thus, potential impacts associated with traffic on CMP facilities would not occur.

As the proposed project site is the same as that of the approved project, no impacts would occur related to traffic on CMP facilities. Impacts would not be greater than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

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

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 5.5-14 of the 2017 EIR.

The 2017 EIR determined that implementation of the approved project could impact line of sight at the site driveway. As such, Mitigation Measure TRA-2 was included to ensure final landscaping plans provide adequate drive sight distance at the site driveway. Upon implementation of Mitigation Measure TRA-2, impacts in this regard were determined to be less than significant.

[3] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the Town has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on the Town's adopted traffic analysis methodology, which requires use of level of service to evaluate traffic impacts of a project.

The proposed modifications to the approved project would not increase any hazards due to geometric design features or incompatible uses. The replacement of the roof structure is a structural change and would not impact circulation in the project area. Further, the addition of a fire access lane in place of the active outdoor recreation area on the western portion of the project site would provide an added access point to the site for emergency vehicles. The proposed project would similarly be required to implement Mitigation Measure TRA-2 to ensure adequate line of sight at the site driveway along Old Mammoth Road. As such, impacts would not be greater than the approved project and would be less than significant with mitigation incorporated.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure TRA-2.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

d) Result in inadequate emergency access?

Development of the approved project would maintain existing emergency access to persons at the project site via access along Old Mammoth Road. While temporary lane closures may be required during project construction, travel along surrounding roadways would remain open and would not interfere with emergency vehicle access in the site vicinity. In addition, the approved project would be required to comply with applicable MLFPD codes for emergency vehicle access. All appropriate fire and emergency access conditions would be incorporated into the design of the approved project and impacts were determined to be less than significant.

The proposed modifications to the approved project would involve constructing a fire access lane in place of the active outdoor recreation area on the western end of the project site. The fire access lane would connect to Meadow Lane and provide an added access point to the project site for emergency vehicles. Similarly, the proposed project would be required to comply with applicable MLFPD codes for emergency vehicle access. As a result, impacts would not be greater than previously analyzed in the 2017 EIR, and impacts would be less than significant.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.
Level of Significance: Less Than Significant Impact.

3.18 TRIBAL CULTURAL RESOURCES

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called tribal cultural resources. Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred

places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.
On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within the 2017 EIR and this Addendum.

AB 52 applies to all new applications deemed complete on or after July 1, 2015. The proposed project involves minor modifications to the previously approved Mammoth Creek Park West New Community Multi-Use Facilities Project (approved in 2017) and does not involve a new application. Thus, the AB 52 process conducted in May 2016 applies to the proposed project.

This section corresponds with 2017 EIR Section 5.4, *Cultural Resources*.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

As detailed in the 2017 EIR, the Town requested tribal consultation for the purposes of AB 52 on May 31, 2016. One tribe, the North Fork Rancheria of Mono Indians of California (North Fork Rancheria), sent a response letter, dated July 18, 2016. The North Fork Rancheria expressed concerns regarding ground disturbance that would occur as a result of the approved project and requested that a tribal monitor be present during ground disturbing phases for the project. The North Fork Rancheria Tribe's letter also indicated that they had reached out and consulted with the Bishop Piute Tribe. Subsequently, a representative of the Bishop Piute Tribe was involved in observing the approved project's Phase II excavation and study. Based on the Phase II excavation and tribal consultation, the Town determined that no tribal cultural resources are known to exist on the project site. As discussed in Section 3.5, *Cultural Resources*, Resource CA-MNO-561 is a cultural resource of Native American origin. However, the project site is not included or determined to be eligible for inclusion in the California Register of Historical Resources, nor is the project included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. No evidence to support the presence of known tribal cultural resources was determined to be located on-site. However, there is the potential for unknown resources to be discovered on-site during site disturbance activities. Thus, Native American monitoring would be required during all project-related ground disturbing activities (Mitigation Measure CUL-1). With implementation of Mitigation Measure CUL-1, potential impacts to unknown tribal cultural resources would be reduced to less than significant levels.

Similar to the approved project, the proposed project would be required to implement Mitigation Measure CUL-1 to ensure impacts to unknown tribal cultural resources are less than significant. The proposed project would not result in greater impacts than that analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure CUL-1.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Refer to Response to 3.18(a)(i). Implementation of the proposed project would not result in greater impacts than previously analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to Mitigation Measure CUL-1.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

3.19 UTILITIES AND SERVICE SYSTEMS

This section corresponds with 2017 EIR Section 6.0, *Other CEQA Considerations*, and Section 8.0, *Effects Found Not To Be Significant*.

Would the project:

a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on pages 6-11 and 8-14 of the 2017 EIR.

Since the approved project does not include any growth-inducing land uses, the 2017 EIR concluded that the project would not exceed the Mammoth Community Water District's (MCWD) wastewater treatment requirements and all generated wastewater would be adequately treated by MCWD. Implementation of the approved project would also result in a net increase of approximately 6,200 gallons per day in water demand, which was determined to be adequately met by the MCWD. Further, since the approved project does not include any growth-inducing land uses, the Town would have the

necessary infrastructure and water supply to accommodate the approved project. The approved project would also implement stormwater drainage facilities, including inlets, storm drain pipes, swales, and two retention basins, which would retain surface water flows created by the approved project.

Southern California Edison (SCE) and AmeriGas provide electrical and propane gas services to the Town, respectively. The 2017 EIR states that SCE has indicated that adequate capacity exists within the area to serve the approved project. As depicted in 2017 EIR Table 6-5, *Energy Consumption*, the project-related building energy would represent a 0.004 percent increase in electricity consumption and a nominal increase in propane consumption beyond current Countywide usage. Therefore, the approved project would not result in a substantial increase in demand for electricity or natural gas. Overall, the 2017 EIR concluded that impacts in this regard would be less than significant.

The proposed project involves replacing the previously proposed pitched roof structure with a sprung structure and replacing the active outdoor recreation area to the west of the ice rink/RecZone with a fire access lane. Implementation of these project modifications would have no impact on the project's overall water demand, wastewater generation, storm drain facilities, or electricity/natural gas consumption. Similar to the approved project, impacts would be less than significant in this regard and impacts would not be greater than that analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-14 of the 2017 EIR.

Refer to Response 3.19(a). Implementation of the proposed project would not generate any additional water demand beyond what was analyzed in the 2017 EIR. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

c) 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?

Refer to Response 3.19(a). Implementation of the proposed project would not generate any additional wastewater compared to what was analyzed in the 2017 EIR. Impacts would be less than significant in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-15 of the 2017 EIR.

The 2017 EIR determined that there is adequate landfill capacity at the Benton Crossing Landfill that can accommodate the solid waste generation and disposal needs for the approved project. Further, all future development would be subject to compliance with the Town's Source Reduction and Recycling Element (SRRE) for solid waste reduction as well as Assembly Bills 939 and 341, which require measures to enhance recycling and source reduction efforts and expand opportunities for additional recycling services and recycling manufacturing facilities. Therefore, impacts in this regard would be less than significant.

The proposed sprung structure and elimination of the active outdoor recreation area would not generate any additional solid waste compared to the approved project. The proposed project would also be required to comply with the Town's regulations and Assembly Bills 939 and 341. Thus, impacts would be less than significant, and no new impacts would result from project implementation.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

This impact threshold was modified since the 2017 EIR was prepared and corresponds to the analysis on page 8-16 of the 2017 EIR.

Refer to Response to 3.19(e). No new impacts related to solid waste regulations would occur. Impacts would be similar to those identified in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

3.20 WILDFIRE

This section corresponds with 2017 EIR Section 8.0, *Effects Found Not To Be Significant.*

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

This impact threshold was not included in the CEQA Guidelines at the time the 2017 EIR was prepared but corresponds to the analysis on page 8-7 of the 2017 EIR.

The 2017 EIR concluded that the Town and surrounding areas have been rated as having a very high fire potential and implementation of the approved project could expose people or the new structure to risk involving wildland fires. This would be true for any development within the Town. The approved project would be subject to compliance with the Uniform Fire Code and MLFPD fire requirements; thus, impacts would be less than significant.

The project site is not located within or near a State responsibility area. According to the California Department of Forestry and Fire's *Mammoth Lakes Draft Very High Fire Hazard Severity Zones in LRA Map*, the project site is not located within a Very High Fire Hazard Severity Zone.[4] As such, the proposed project would not result in a greater impact than the approved project and no impacts would occur in this regard.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

[4] California Department of Forestry and Fire Resources, *Mammoth Lakes Very High Fire Hazard Severity Zones in LRA*, September 17, 2007.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Refer to Response 3.20(a). No impact would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Refer to Response 3.20(a). No impact would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Refer to Response 3.20(a). No impact would occur.

Certified 2017 EIR Mitigation Measures: No mitigation measures were required in the 2017 EIR.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: No Impact.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Based on this Addendum, the proposed project has not substantially changed in regard to the setting, design, impacts, and mitigation measures as described in the 2017 EIR. New circumstances or new information, including any new or revised environmental laws, regulations, or policies have not modified the impacts of the proposed project compared to that analyzed in the 2017 EIR.

a) ***Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

The proposed project would not result in impacts beyond those identified in the 2017 EIR in this regard and does not have the potential to degrade the environment, reduce the habitat of a fish or wildlife species, threaten plant or animal communities, reduce or restrict endangered plant or animal species, or eliminate important examples of major periods of California history or prehistory with 2017 EIR mitigation measures incorporated; refer to Section 3.4, *Biological Resources*, and 3.4, *Cultural Resources*. Impacts would not be greater than analyzed in the 2017 EIR.

Certified 2017 EIR Mitigation Measures: Refer to mitigation measures identified above.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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)?***

Given the nature and scope of the proposed project, and in consideration of the mitigation measures included in the 2017 EIR, the project would not involve impacts that are cumulatively considerable.

Certified 2017 EIR Mitigation Measures: Refer to mitigation measures identified above.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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

Construction-related activities are anticipated to have some relatively minor, temporary impacts which can be mitigated with implementation of measures included in the 2017 EIR. Additionally, potential long-term (operational) impacts would similarly be reduced to less than significant levels through implementation of required 2017 EIR mitigation measures. Thus, the proposed project would not involve environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly.

Certified 2017 EIR Mitigation Measures: Refer to mitigation measures identified above.

Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Certified 2017 EIR Mitigation Measures.

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4.0 REFERENCES

The following references were utilized for the preparation of this Addendum:

California Department of Forestry and Fire Resources, *Mammoth Lakes Very High Fire Hazard Severity Zones in LRA*, September 17, 2007.

California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed August 12, 2019.

California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed August 29, 2019.

Google Earth, 2018.

HMC Architects, *New Community Recreation Center Plan Set*, September 19, 2019.

LSC Transportation Consultants, Inc., *Mammoth Multi-Use Facility Addendum Memorandum*, August 20, 2019.

Michael Baker International, *Mammoth Creek Park West New Community Multi-Use Facilities Final Environmental Impact Report (State Clearinghouse No. 2016062009)*, April 21, 2017.

Town of Mammoth Lakes, *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update*, May 2007.

Town of Mammoth Lakes, *Town of Mammoth Lakes General Plan 2007*, August 15, 2007.

Town of Mammoth Lakes, *Town of Mammoth Lakes Municipal Code*, codified through Ordinance No. 19-01, adopted April 3, 2019.

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Appendix A
Modified Initial Study Checklist

The following Modified Initial Study Checklist is based on the California Environmental Quality Act (CEQA) Appendix G Environmental Checklist Form. It is modified to evaluate the proposed project changes for which an environmental impact report has previously been completed to assist in the determination of the need for supplemental environmental documents, in this case, a Supplemental EIR or an Addendum under Public Resources Code 21166 and Guideline Sections 15162, 15163, and 15164, respectively. For purposes of this study, references to "the project" in the left-hand column questions refer to the proposed modifications (proposed project) as compared to the Mammoth Creek Park West New Community Multi-Use Facilities Project evaluated in the 2017 EIR.

The first four columns to the right of the modified checklist questions identify whether the proposed project modifications would result in new impacts, and if so whether these impacts would be less than significant, less than significant with mitigation from the 2017 EIR incorporated, or potentially significant.

The fifth column asks whether the impacts associated with proposed project, if any, were sufficiently disclosed in the previous environmental documents.

Finally, the last column indicates whether or not a Supplemental EIR is needed. A Supplemental EIR would be needed if there were new significant unmitigated or substantially more severe impacts, which would result from the proposed project and which were not sufficiently disclosed in the previous environmental document.

MODIFIED INITIAL STUDY CHECKLIST

	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:						
a) Have a substantial adverse effect on a scenic vista?		X			YES	NO
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	X				YES	NO
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		YES	NO
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X		YES	NO
II. AGRICULTURAL 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement 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?	X				YES	NO
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	X				YES	NO
c) Conflict with existing zoning for, or cause rezoning, of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	X				YES	NO
d) Result in the loss of forest land or conversion of forest land to non-forest use?	X				YES	NO
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	X				YES	NO
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?		X			YES	NO
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is			X		YES	NO

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
non-attainment under an applicable federal or state ambient air quality standard?						
c) Expose sensitive receptors to substantial pollutant concentrations?			X		YES	NO
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		X			YES	NO
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?		X			YES	NO
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X		YES	NO
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X				YES	NO
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?			X		YES	NO
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X		YES	NO
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?	X				YES	NO
V. CULTURAL RESOURCES. Would the project:						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?			X		YES	NO
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X		YES	NO
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X			YES	NO

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
VI. ENERGY. Would the project:						
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		X			YES	NO
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?		X			YES	NO
VII. GEOLOGY AND SOILS. Would the project:						
a) Directly or indirectly cause 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.	X				YES	NO
ii) Strong seismic ground shaking?	X				YES	NO
iii) Seismic-related ground failure, including liquefaction?	X				YES	NO
iv) Landslides?	X				YES	NO
b) Result in substantial soil erosion or the loss of topsoil?		X			YES	NO
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?		X			YES	NO
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	X				YES	NO
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?	X				YES	NO
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X				YES	NO
VIII. GREENHOUSE GAS EMISSIONS. Would the project:						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X			YES	NO

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		X			YES	NO
IX. 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?		X			YES	NO
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?	X				YES	NO
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X				YES	NO
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?	X				YES	NO
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 or excessive noise for people residing or working in the project area?	X				YES	NO
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X				YES	NO
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?		X			YES	NO
X. HYDROLOGY AND WATER QUALITY. Would the project:						
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X		YES	NO
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		X			YES	NO
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						
i) Result in substantial erosion or siltation on- or off-site?			X		YES	NO

MODIFIED INITIAL STUDY CHECKLIST

	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?		X			YES	NO
iii) 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?			X		YES	NO
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	X				YES	NO
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X		NO	NO
XI. LAND USE AND PLANNING. Would the project:						
a) Physically divide an established community?	X				YES	NO
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		X			YES	NO
XII. 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?	X				YES	NO
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?	X				YES	NO
XIII. NOISE. Would the project result in:						
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X		YES	NO
b) Generation of excessive groundborne vibration or groundborne noise levels?		X			YES	NO
c) For a project located within the vicinity of a private airstrip or 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?	X				YES	NO
XIV. POPULATION AND HOUSING. Would the project:						
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for	X				YES	NO

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
example, through extension of roads or other infrastructure)?						
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	X				YES	NO
XV. PUBLIC SERVICES.						
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
i) Fire protection?		X			YES	NO
ii) Police protection?		X			YES	NO
iii) Schools?	X				YES	NO
iv) Parks?		X			YES	NO
v) Other public facilities?		X			YES	NO
XVI. 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?		X			YES	NO
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?		X			YES	NO
XVII. TRANSPORTATION. Would the project:						
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X		YES	NO
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?[5]	X				YES	NO

[5] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the Town has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on the Town's adopted traffic analysis methodology, which requires use of level of service to evaluate traffic impacts of a project.

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X		YES	NO
d) Result in inadequate emergency access?		X			YES	NO
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X		YES	NO
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X		YES	NO
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:						
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		X			YES	NO
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?		X			YES	NO
c) 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?		X			YES	NO
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?		X			YES	NO
e) Comply with Federal, state, and local management and reduction statutes and regulations related to solid waste?		X			YES	NO
XX. WILDFIRE. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	X				NO	NO

MODIFIED INITIAL STUDY CHECKLIST						
	New Impacts of Proposed Project				Certified 2017 EIR	
	No Impact	Less Than Significant Impact	Less Than Significant With 2017 Mitigation	Potentially Significant Impact	Impacts Disclosed?	Subsequent or Supplemental EIR Required?
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	X				NO	NO
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	X				NO	NO
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	X				NO	NO
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.						
a) Does the project have the potential to substantially 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, substantially 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?			X		YES	NO
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)?			X		YES	NO
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X		YES	NO

Appendix B
Traffic Validation Letter

LSC TRANSPORTATION CONSULTANTS, INC.

2690 Lake Forest Road, Suite C
P. O. Box 5875
Tahoe City, CA 96145
(530) 583-4053
FAX (530) 583-5966
Email: lsc@lsctahoe.com
Website: www.lsctrans.com

August 20, 2019

Eddie Torres, Planning Manager
Michael Baker International
5 Hutton Centre Drive, Suite 500
Santa Ana, CA 92707

RE: Mammoth Multi-Use Facility Addendum

Dear Mr. Torres:

The Mammoth Multi-Use Facility project is proposed to be located at Mammoth Creek Park in Mammoth, California. Subsequent to the *Mammoth Community and Multi-Use Facility Focused Traffic Impact Analysis Memo* (LSC, July 29, 2016), the project plans were revised.

The changes made include; the building type was changed to a sprung structure and all community facilities are now located inside the structure. The additional facilities now housed inside the structure would not impact the activities or programs provided at the facility. Since the trip generation and traffic impact analysis were based on the activities and programs, this would not affect the conclusions and recommendations of the pervious traffic analysis.

Therefore, the previous traffic analysis and conclusions remain valid under the revised plan

Respectfully Submitted,

LSC TRANSPORTATION CONSULTANTS, INC.

By Leslie Suen
Leslie Suen, PE