5.7 Utilities and Service Systems

5.7 UTILITIES AND SERVICE SYSTEMS

This section is based upon information provided by the Mammoth Community Water District (MCWD); refer to Appendix 11.5, *Utility Correspondence*. Other references relied upon the *2010 Urban Water Management Plan* (2010 UWMP), dated November 2011, prepared by the MCWD. In the context of this SEIR, the utilities and service systems consist of water and wastewater (sewers). Other public services are addressed in Appendix 11.1, *Modified Initial Study and Notice of Preparation*.

This section discusses existing conditions, which provide background information necessary to determine potential impacts of the proposed project. Criteria by which an impact may be considered potentially significant are provided, along with a discussion of impacts pursuant to Appendix G of the CEQA Guidelines. Mitigation measures are identified to avoid or reduce potential impacts to less than significant levels.

5.7.1 EXISTING SETTING

WATER

Water Supply

The project site is served by the MCWD. The 2010 UWMP was adopted in November 2011. Based on the 2010 UWMP, the MCWD has 3,660 water service connections and relies on water supply provided by local surface water, ground water, recycled water, and savings from water conservation (demand management) measures.

Surface Water. The MCWD utilizes surface water as the primary water source when it is available because less energy and fewer chemicals are required to divert, treat, and deliver water from the Lake Mary Water Treatment Plant (WTP). Surface water requires minimal treatment, and the supply is gravity-fed to almost the entire service area. The MCWD has two water right licenses and one permit issued by the State Water Resources Control Board (SWRCB) that entitle the MCWD to both store and divert surface water at Lake Mary, allowing up to a maximum annual surface water diversion of 2,760 acre-feet with the exception of future water demands including water diversions, extractions, and deliveries in the MCWD's service area not exceeding 4,387 acre-feet per year (AFY) per a recent settlement agreement between Los Angeles Department of Water and Power (DWP) and the MCWD. However, actual diversions are typically significantly lower due to the combined influence of natural variability in snowpack runoff quantity and timing, limited storage to manage the variable runoff, mismatch between the seasonal trends in supply availability and community water demands, and compliance with the monthly minimum Mammoth Creek fishery bypass.

Groundwater. Groundwater supply comes from nine production wells within the Mammoth groundwater basin. During the past five years, the MCWD pumped an average of 1,682 AFY. Groundwater supply is limited by the capacity of the nine wells, groundwater level drawdown impacts on well production, and the ability of the two ground water treatment plants (GWTP) to effectively treat and remove naturally occurring drinking water contaminants such as arsenic, iron, and manganese. Treated water is stored in 10 distribution system storage reservoirs, with a combined capacity of 7.5 million gallons. The water distribution system also includes 81 miles of

pipelines, seven booster pump stations, and five pressure zones. The MCWD has a State-approved Groundwater Management Plan in compliance with AB-3030, and will be providing long term monitoring data for the State's California Statewide Groundwater Elevation Monitoring (CASGEM) program to Mono County.

Recycled Water. Delivery of recycled water meeting Title 22 water standards for unrestricted irrigation use began in 2010. In 2009, the Lahontan Regional Water Quality Control Board (RWQCB) issued a master permit to the MCWD for recycled water supply within the MCWD service area. By 2010, construction of the distribution system pump stations and pipelines to serve the Sierra Star and Snowcreek golf courses were completed and Sierra Star began using recycled water for irrigation. The golf course irrigation for Snowcreek and Sierra Star (320 AFY each), along with minor amounts of construction-use water, are the only established long term uses for recycled water. The recycled water system includes an advanced wastewater treatment plant producing Title 22 quality recycled water, two booster pump stations, and 21,000 feet of distribution mains.

Water Supplies. Based on the 2010 UWMP, the MCWD can currently supply 3,895 AFY (as of 2010) to their service area. By 2030, available water supply is anticipated to increase to 4,436 AFY, above the MCWD water demand limit of 4,387 AFY per the recent settlement agreement between DWP and the MCWD. As previously noted, with the settlement agreement between DWP and MCWD, future water demands including water diversions, extractions, and deliveries in the MCWD's service area should not exceed 4,387 AFY. The groundwater and surface water supply values do not change over the planning horizon, as there are no new anticipated sources of surface or groundwater supply, with the exception of one planned back up well (Well 11). The recycled water quantities reflect the existing and planned increased use at the Sierra Star and Snowcreek golf courses only.

During current conditions (2010) and intermediate planning horizons through 2030, MCWD's combined use of Mammoth Creek surface water, local groundwater, and recycled water results in a supply mix that can reliably meet the community needs under the full range of water year types, including both the severe one year and sustained multi-year droughts. The water supply reliability results also include water treatment plant processed water losses (such as filter backwash) and recycled water used for irrigation. The water supply reliability, which is based on the 2010 UWMP, is summarized, as follows:

- *Normal Conditions*. Under normal conditions, the Town's average current (2010) water demand including processed water or water losses is 2,589 AFY and forecast 2030 water demand is 4,180 AFY. As indicated in 2010 UWMP Table 5-10, *Supply and Total Demand Comparison – Normal Year (in acre-feet)*, the MCWD anticipates meeting demands under normal conditions through current supplies.

- *Single Dry Year Conditions*. Under single dry year conditions, the Town's forecast 2030 water demand including processed water or water losses is 4,180 AFY. As indicated in 2010 UWMP Table 5-11, *Supply and Demand Comparison – Single Dry Year (in acre-feet)*, the MCWD anticipates meeting demands under single dry year conditions through increasing the availability of local groundwater resources, providing 90 percent of the supply in a severe one year drought.

- *Multiple Dry Year Conditions*. Under multiple dry year conditions, the Town's forecast 2030 water demand including processed water or water losses is 4,180 AFY. As indicated in 2010 UWMP Table 12, *Supply and Demand Comparison – Multiple Dry Year Event (in acre-feet)*, the MCWD anticipates meeting demands under multiple dry year conditions through increasing the availability of local groundwater resources with 60 percent of the supply over a three year sustained drought.

Water Demand and Existing Facilities

In 2013, the Town's average daily flow was 3.6 cubic feet per second (cfs) and the peak demand was 4.43 million gallons per day (mgd). These 2013 figures include golf course irrigation.[1] Table 5.7-1, *2005 Through 2030 Total Water Demand*, provides the current and projected water demand. The total water demand in 2005 was 2,564 acre-feet and in 2010 it was 2,169 acre-feet. The reduced water demand in 2010 could be partially explained by the late start of the irrigation season. The total water demand does not include the additional processed water uses or water losses.[2]

Table 5.7-1
2005 Through 2030 Total Water Demand

Water Supply Sources	Acre-Feet Per Year (AFY)					
	2005	2010	2015	2020	2025	2030
Total Water Deliveries	2,564	2,169	2,565	2,961	3,357	3,751
Additional Processed Water Uses and Losses	857	420	424	426	428	429
Total	3,421	2,589	2,989	3,387	3,785	4,180

Source: Mammoth Community Water District, *2010 Urban Water Management Plan*, November 2011.

Currently, the project site consists of an existing parking structure podium and does not require water services. The distribution system surrounding the project site consists of existing water lines along Canyon Boulevard, Minaret Road, and Main Street/Lake Mary Road; refer to Exhibit 5.7-1, *Existing Water and Wastewater Facilities*. Pressure reducing stations are planned for construction along Minaret Road and Canyon Boulevard, which may change water pressure zone boundaries around the project area. The existing design of the water delivery system is sufficient to meet the current water demands.[3]

WASTEWATER

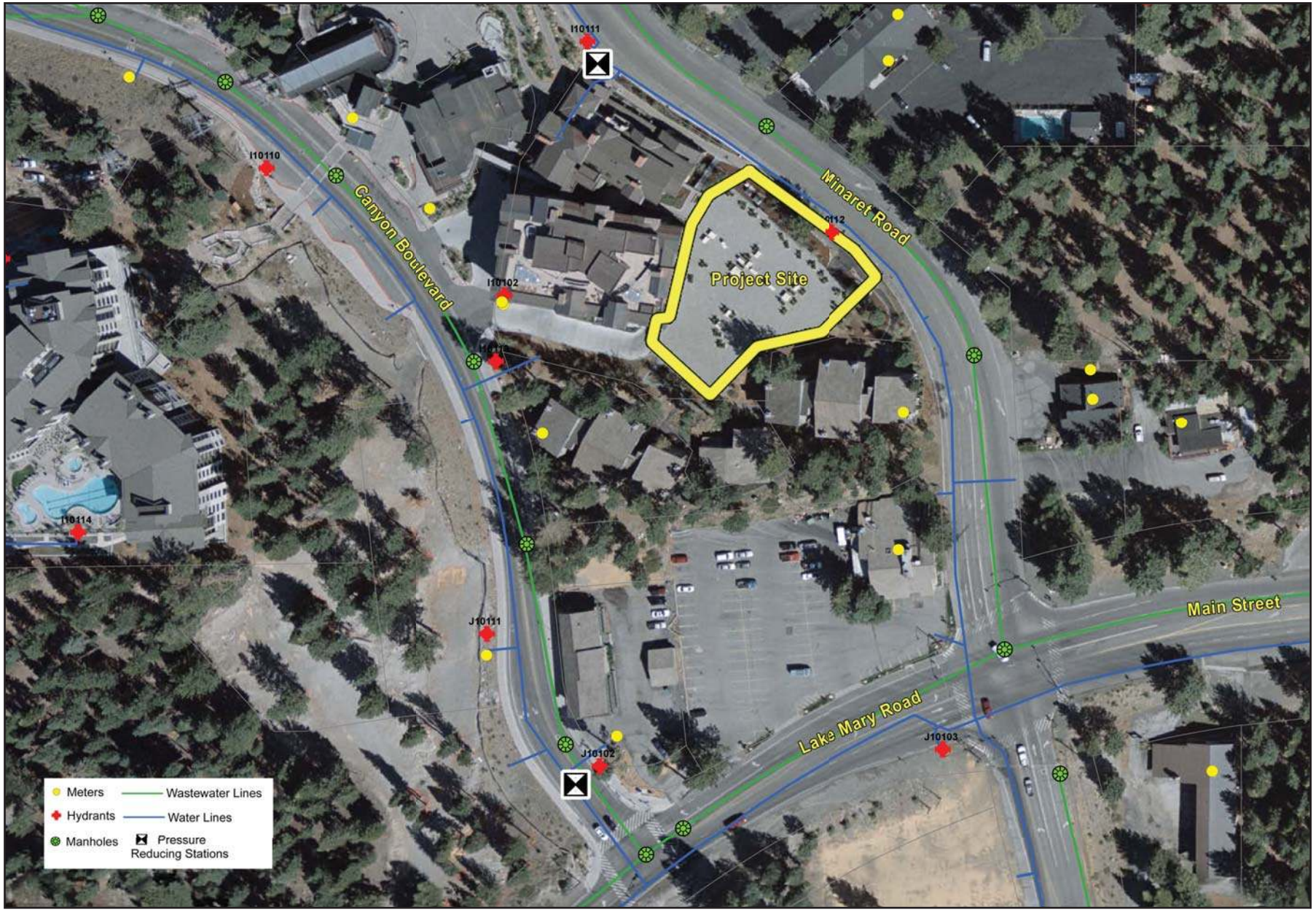
The MCWD owns, operates, and maintains the sewage collection systems for the Town, including pump stations and over 35 miles of sewer mains and interceptors.[4] There are four main trunks of the MCWD sewer collection system located on the following streets: Old Mammoth Road, Meridian

[1] Written correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

[2] Ibid.

[3] Ibid.

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



Source: Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

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SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Existing Water and Wastewater Facilities

Exhibit 5.7-1

Boulevard, Sierra Star Golf Course to Center Street, and Main Street. The inceptor lines vary in diameter from 18 to 21 inches. MCWD also operates and maintains 13 wastewater pump stations and 11 miles of sewers for the United States Forest Service (USFS). Raw wastewater is delivered to the MCWD wastewater treatment facility, located near the intersection of Meridian Boulevard and State Route 203, through Old Mammoth Road and Main Street.

The MCWD's wastewater treatment facility provides advanced secondary treatment. This includes biological treatment, filtration, and disinfection through utilization of chlorine. Treated wastewater is currently discharged to Laurel Pond, located approximately 5.5 miles southeast of the Town on USFS land. Disposal occurs at the pond through percolation into the ground and evaporation into the atmosphere.

Wastewater Generation and Facilities

As previously indicated, the project site currently consists of an existing parking structure podium and, therefore, does not generate wastewater. Currently, sewer lines are present within the project area, located along Canyon Boulevard, Minaret Road, and Main Street/Lake Mary Road; refer to Exhibit 5.7-1. In addition, one 8-inch sewer from Building B would be required to be relocated to the northwest boundary of the project site; refer to Exhibit 5.7-2, *Grading and Drainage Plan*. There are no plans to build new sewer lines within the project area.

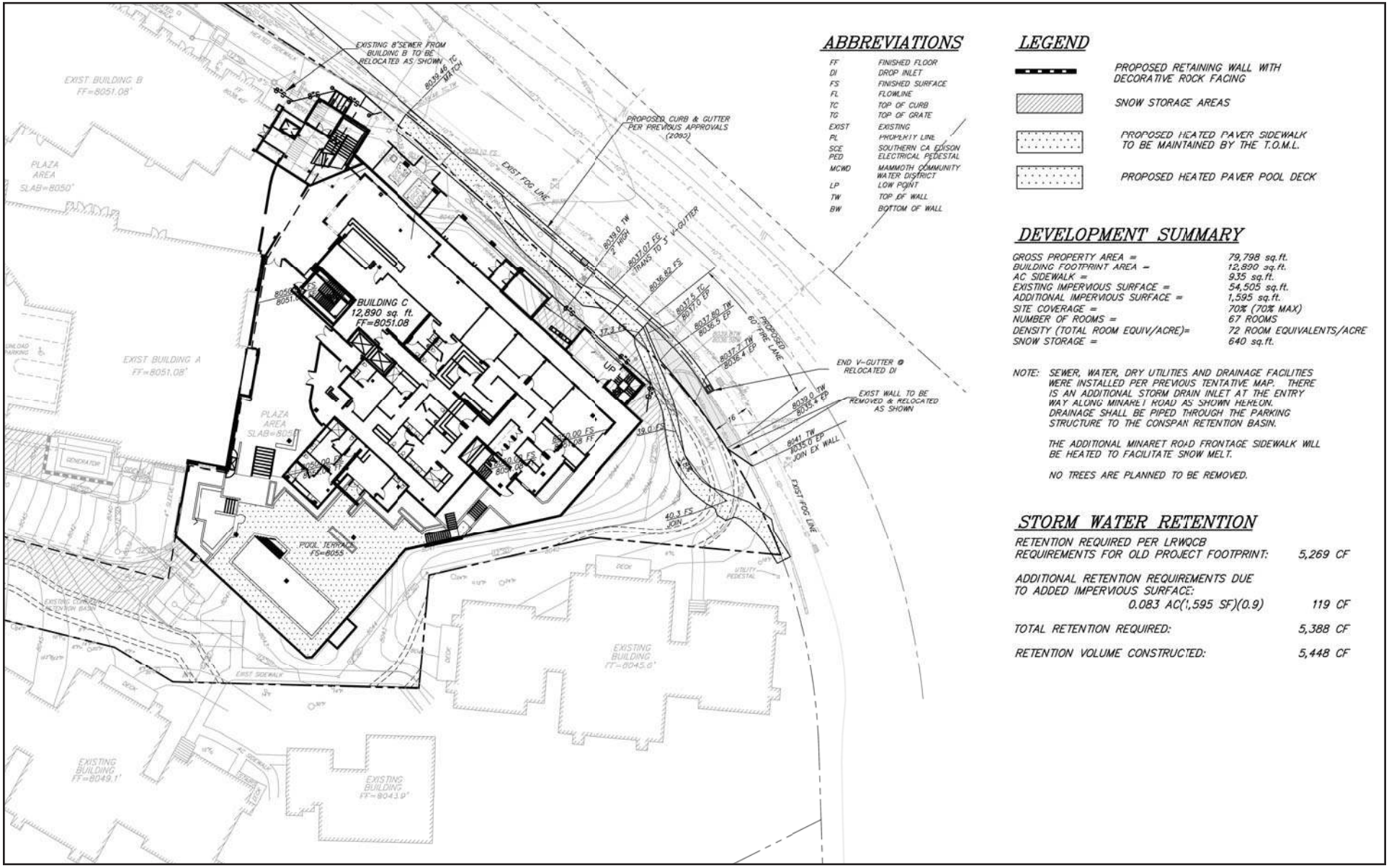
5.7.2 REGULATORY SETTING

WATER

State Level

Urban Water Management Act

The Urban Water Management Plan Act (UWMP Act) was passed in 1983 and codified as California Water Code Sections 10610 through 10657. Since its passage in 1983, the Act has been amended on several occasions. In 2004, the Act was amended to require additional discussion of transfer and exchange opportunities, non-implemented demand management measures, and planned water supply projects. Most recently, in 2005, the Act was amended to require water use projections (required by California Water Code Section 10631) to include projected water use for single-family and multi-family residential housing needed for lower income households. In addition, Government Code Section 65589.7 was amended to require local governments to provide a copy of the adopted housing element to water and sewer providers. The Act requires "every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre feet of water annually, to prepare and adopt, in accordance with prescribed requirements, an urban water management plan." Urban water suppliers must file these plans with the California Department of Water Resources every five years describing and evaluating reasonable and practical efficient water uses, reclamation, and conservation activities. As required by the Memorandum of Understanding Regarding Urban Water Conservation in California and Assembly Bill 11 (Filante, 1991), the 2005 UWMP Act, incorporated water conservation initiatives, and a Water Shortage Contingency Plan.



ABBREVIATIONS

FF	FINISHED FLOOR
DI	DROP INLET
FS	FINISHED SURFACE
FL	FLOWLINE
TC	TOP OF CURB
TG	TOP OF GRATE
EXIST	EXISTING
PL	PROPERTY LINE
SCE PED	SOUTHERN CA EDISON ELECTRICAL PEDESTAL
MCWD	MAMMOTH COMMUNITY WATER DISTRICT
LP	LOW POINT
TW	TOP OF WALL
BW	BOTTOM OF WALL

LEGEND

- PROPOSED RETAINING WALL WITH DECORATIVE ROCK FACING
- SNOW STORAGE AREAS
- PROPOSED HEATED PAVER SIDEWALK TO BE MAINTAINED BY THE T.O.M.L.
- PROPOSED HEATED PAVER POOL DECK

DEVELOPMENT SUMMARY

GROSS PROPERTY AREA =	79,798 sq.ft.
BUILDING FOOTPRINT AREA =	12,890 sq.ft.
AC SIDEWALK =	935 sq.ft.
EXISTING IMPERVIOUS SURFACE =	54,505 sq.ft.
ADDITIONAL IMPERVIOUS SURFACE =	1,595 sq.ft.
SITE COVERAGE =	70% (70% MAX)
NUMBER OF ROOMS =	67 ROOMS
DENSITY (TOTAL ROOM EQUIV/ACRE)=	72 ROOM EQUIVALENTS/ACRE
SNOW STORAGE =	640 sq.ft.

NOTE: SEWER, WATER, DRY UTILITIES AND DRAINAGE FACILITIES WERE INSTALLED PER PREVIOUS TENTATIVE MAP. THERE IS AN ADDITIONAL STORM DRAIN INLET AT THE ENTRY WAY ALONG MINARET ROAD AS SHOWN HEREON. DRAINAGE SHALL BE PIPED THROUGH THE PARKING STRUCTURE TO THE CONSPAN RETENTION BASIN.

THE ADDITIONAL MINARET ROAD FRONTAGE SIDEWALK WILL BE HEATED TO FACILITATE SNOW MELT.

NO TREES ARE PLANNED TO BE REMOVED.

STORM WATER RETENTION

RETENTION REQUIRED PER LRWQCB REQUIREMENTS FOR OLD PROJECT FOOTPRINT:	5,269 CF
ADDITIONAL RETENTION REQUIREMENTS DUE TO ADDED IMPERVIOUS SURFACE: 0.083 AC(1,595 SF)(0.9)	119 CF
TOTAL RETENTION REQUIRED:	5,388 CF
RETENTION VOLUME CONSTRUCTED:	5,448 CF

Source: Triad/Holmes Associates; May 13, 2014.

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Grading and Drainage Plan

Exhibit 5.7-2

Water Conservation Act of 2009

Senate Bill X7-7, the Water Conservation Act of 2009 (WCA), creates a framework for future planning and actions by urban (and agricultural) water suppliers to reduce California's water use. The law requires urban water suppliers to reduce statewide per capita water consumption by 20 percent by 2020. Additionally, the State is required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent by 2015. Each urban retail water supplier was required to develop water use targets and an interim water use target by July 1, 2011. Each urban retail water supplier was required, by July 2011, to include in their water management plan the baseline daily per capita water use, water use target, interim water use target, and compliance daily per capita water use.

Senate Bill 610

In regard to water supply, the Water Code (commonly referred to as Senate Bill (SB) 610, according to the enacting legislation) requires preparation of a Water Supply Assessment (WSA) for certain projects.[5] The Water Code requires that a WSA be prepared for any "project" which would consist of one or more of the following:[6]

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A mixed-use project that includes one or more of the projects specified above; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Senate Bill 221

SB 221[7] amended state law to improve the link between information on water supply availability and land use at the tentative map preparation phase of a project. SB 610 and SB 221 are companion measures which seek to:

[5] Water Code Sections 10910–10915.
[6] Water Code Section 10910(b).
[7] Business and Professions Code Section 11010 and Government Code Section 66473.4.

- Promote more collaborative planning between local water suppliers and cities and counties;

- Require that detailed information regarding water availability be provided to town and county decision-makers prior to approval of specific large development projects;

- Require that this detailed information be included in the administrative record that serves as the evidentiary basis for an approval action by the town or county on such projects; and

- Recognize local control and decision making regarding the availability of water for projects and the approval of projects.

SB 221 pertains only to residential projects and establishes the relationship between the WSA prepared for a project and the project approval under the Subdivision Map Act.

Assembly Bill 3030

Assembly Bill (AB) 3030, the Groundwater Management Act, is Section 10750 et seq. of the California Water Code. AB 3030 provides local water agencies with procedures to develop a groundwater management plan so those agencies can manage their groundwater resources efficiently and safely while protecting the quality of supplies. Under AB 3030, the development of a groundwater management plan by a local water agency is voluntary. Once a plan is adopted, the rules and regulations contained therein must also be adopted to implement the program outlined in the plan.

Efficiency Standards

Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 addresses public utilities and energy and includes appliance efficiency standards that promote water conservation. In addition, a number of State laws listed below require water-efficient plumbing fixtures in structures:

- Title 24, California Administrative Code, Sections 25352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. Insulation of water-heating systems is also required.

- Title 20, California Administrative Code, Section 1604(g) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, sink faucets, and tub spout diverters.

- Title 20, California Administrative Code, Section 1606 prohibits the sale of fixtures that do not comply with established efficiency regulations.

- Health and Safety Code, Section 17921.3 requires low-flush toilets and urinals in virtually all buildings.

- Health and Safety Code, Section 116785 prohibits installation of residential water softening or conditioning appliances unless certain conditions are satisfied, and includes the

requirement that water conservation devices on fixtures using softened or conditioned water be installed.

Regional Level

2010 Urban Water Management Plan

In accordance with State legislation, MCWD adopted an updated UWMP in November 2011. The 2010 UWMP provides the following:

- Information, analysis, and conclusions regarding past, current, and projected future water supply and demand;
- Current and future water supplies to meet projected demands; supply reliability under future demand conditions;
- Plans for potential water shortages; and
- Actions to reduce water demand; and future potential impacts of climate change on local water supplies.

In understanding that the MCWD's surface water supply could be impacted by climate change impacts to snowpack water content and watershed runoff patterns, the 2010 UWMP also includes both adaptation strategies (measures to change water supply and management infrastructure, and changes to customer use characteristics to respond to the effects of climate change) and mitigation strategies (changes implemented to reduce greenhouse gas emissions and their contribution to the mechanisms driving climate change).

Groundwater Management Plan for the Mammoth Basin Watershed

The *Groundwater Management Plan for the Mammoth Basin Watershed* (Groundwater Plan), dated July 2005, was developed with guidance from AB 3030 guidelines. It develops a management strategy that focuses on groundwater resources being managed in a manner that ensures sufficient, high quality groundwater resources while minimizing potential environmental impacts. Information and analysis contained within the Groundwater Plan is based on previously published reports, conclusions of recent research, and MCWD data compilations on hydrologic conditions, facility locations, and water production for the Mammoth Basin watershed.

Water Conservation Ordinance Update

In March 2014, MCWD adopted a water conservation ordinance update establishing rules and regulations concerning water shortages, water conservation standards and regulations, and their enforcement. The ordinance establishes permanent and mandatory water management requirements in order to assure adequate supplies of water to meet the needs of the public, and further their public health, safety and welfare that are necessary to:

- Conserve water;
- Enable effective water supply planning;

- Assure reasonable and beneficial use of water;
- Prevent waste of water;
- Prevent unreasonable use of water; and
- Prevent unreasonable methods of use of water within the MCWD service area.

In addition, it establishes four levels of actions to be implemented in times of shortage, with increasing restrictions placed on water use when water supply or water production capabilities are declining.

Level 1 Water Restrictions

Following a dry winter and a warm summer as well as a decline in groundwater aquifers, the MCWD Board enacted *Level 1 Water Restrictions,* to place restrictions on water use. The outdoor irrigation requirements that assist in maximizing irrigation efficiency and mitigating increased water demand include:

- Even numbered addresses irrigate on Monday, Wednesday and Saturday;
- Odd numbered addresses irrigate on Tuesday, Thursday and Sunday;
- No outdoor watering between the hours of 10 a.m. and 7 p.m.;
- No irrigation variances will be granted for new lawns or rehabilitating more than 5 percent of existing turf;
- All hose-end sprinklers must be equipped with a shutoff timer;
- Overfilling of swimming pools or spas is prohibited;
- Water may not pool, pond, or mist off of impervious areas;
- Irrigation accounts may not exceed 150 percent of the MCWD's Maximum Applied Water Allowance (MAWA);
- Irrigation with a hand-held hose equipped with a shut-off device is exempt from day of week and time of day restrictions;
- Washing of hard surfaces with MCWD supplied water is prohibited, unless required for health and safety reasons; and
- All leaks must be repaired within in five days after notification from the MCWD.

WASTEWATER

Regional Level

Water Quality Control Plan for the Lahontan Region, North and South Basins

The Town is within the jurisdictional boundaries of the Lahontan RWQCB. The Lahontan RWQCB develops and enforces water quality objectives and implementation plans that safeguard the quality of water resources in its region. Chapter 4.4 of the *Water Quality Control Plan for the Lahontan Region, North and South Basins* (WQCP), dated December 2005, outlines policies and regulations for municipal wastewater treatment, disposal, and reclamation. The standards contained within the WQCP are designed to provide developers with a uniform approach for the design and installation of adequate systems to control wastewater and wastewater treatment/sewage disposal impacts from the Town, and to prevent any potential contamination of groundwater at the discharge site.

Local Level

Town of Mammoth Lakes General Plan 2007

Town policies pertaining to utility and service systems are contained in the Resource Management and Conservation and Public Health and Safety Elements of the *Town of Mammoth Lakes General Plan 2007* (2007 General Plan), adopted on August 15, 2007. The Resource Management and Conservation Element focuses on the Town's stewardship in managing and conserving the community's natural resources.

Resource Management and Conservation Element policies that pertain to the proposed project include, but are not limited to, the following:

- Work with MCWD to ensure that groundwater is not over-drafted and does not cause negative environmental impacts to resources such as surface water, springs and native vegetation (Policy R.1.H.).

- The Town shall work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established prior to development approvals (Policy R.4.A.).

- Support and encourage water conservation and recycled water use within private and public developments (Policy R.4.B.).

- Require drought-tolerant landscaping and water-efficient irrigation practices for all development and Town-maintained landscaped areas, parks and park improvement projects. Development design, including parks, may include limited turf as appropriate to the intended use (Policy R.4.C.).

- Require development to use native and compatible non-native plants, especially drought-resistant species, to the greatest extent possible when fulfilling landscaping requirements (Policy R.4.D.).

- Limit use of turf over root zones of native trees to avoid or minimize adverse impacts of excessive water to native trees (Policy R.4.E.).

- Support programs to recycle materials such as paper, cardboard, glass, metal, plastics, motor oil, and programs to compost or chip for mulch tree cuttings, brush, and other vegetation (Policy R.9.A.).

The intent of the Public Health and Safety Element is to improve the quality of life to encourage people to live and work in the Town. The policy applicable to utilities and services systems states that the quality of life may be improved through the establishment of Level of Service standards for facilities, operations and services, and resource management (Policy S.6.A.).

5.7.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

Appendix G of the CEQA Guidelines contains the Modified Initial Study Environmental Checklist form used during preparation of the Modified Initial Study, which is contained in Appendix 11.1 of this SEIR. The Modified Initial Study includes questions relating to utilities and service systems. The issues presented in the Environmental Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (refer to Impact Statements USS-1 and USS-2).

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects (refer to Impact Statements USS-1, USS-2, and USS-3).

- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects (refer to Section 8.0, *Effects Found Not To Be Significant*).

- Have insufficient water supplies available to serve the project from existing entitlement and resources, and new or expanded entitlement is needed (refer to Impact Statement USS-2).

- Result in a determination by the wastewater treatment provider, which serves or may serve the project that does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (refer to Impact Statement USS-3).

- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs (refer to Section 8.0, *Effects Found Not To Be Significant*).

- Comply with federal, state, and local statutes and regulations regarding solid waste (refer to Section 8.0, *Effects Found Not To Be Significant*).

Based on these standards, the effects of the proposed project have been categorized as either a "less than significant impact" or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

5.7.4 OVERVIEW OF PREVIOUS ENVIRONMENTAL ANALYSIS

Water

The 1991 PEIR determined that the potential impacts from the estimated total water demand of the development of the NVSP would be reduced to less than significant levels with implementation of recommended mitigation measures. According to the 1994 PEIR Addendum, the 1994 NVSP Amendment resulted in no changes to the impacts, mitigation measures, or cumulative impacts with respect to public utilities beyond those identified in the 1991 PEIR. With implementation of recommended mitigation measures, these impacts would be reduced to less than significant levels. Based on the 1999 SPEIR, the 1999 NVSP Amendment would increase water demand above existing conditions, requiring some existing water main pipelines to be upgraded and an incremental expansion of the existing water system. The 1999 SPEIR concluded that implementation of mitigation measures would reduce potential impacts to water systems and facilities to less than significant levels.

Wastewater

According to the 1991 PEIR, the development of the NVSP was anticipated to generate approximately 459,100 gallons of wastewater per day. As the MCWD had adequate treatment capacity for project-generated wastewater flows, the 1991 PEIR concluded there was a less than significant impact on wastewater facilities. Based on the 1994 PEIR Addendum, the 1994 NVSP Amendment resulted in no changes to the impacts, mitigation measures, or cumulative impacts with respect to public utilities beyond those identified in the 1991 PEIR. According to the 1999 SPEIR, the 1999 NVSP Amendment would increase generated wastewater above existing conditions, presenting an increase in service demand for operations and maintenance of the sewer pipeline system and treatment facility. The 1999 SPEIR concluded that mitigation measures pertaining to issuance of a sewer permit and applicable fee payments prior to construction of any facilities would reduce potential impacts to wastewater systems and facilities to less than significant levels.

5.7.5 IMPACTS AND MITIGATION MEASURES

SHORT-TERM CONSTRUCTION (WATER DEMAND AND WASTEWATER GENERATION)

USS-1 WATER DEMAND AND WASTEWATER GENERATION DURING CONSTRUCTION WOULD NOT RESULT IN A SIGNIFICANT DEMAND ON WATER OR GENERATE A SIGNIFICANT AMOUNT OF WASTEWATER.

Impact Analysis: This threshold was not addressed in the 1999 SPEIR. Water demand and wastewater generation during construction associated with the proposed Inn at the Village project are discussed below.

Water Demand

The project site is currently an existing parking structure. Thus, there is no existing demand for water associated with the project site. Construction of the proposed project would create a demand for water during the 12-month construction. As discussed in Section 3.3, *Project Characteristics*, construction activities would include demolition, grading, building construction, paving, and architectural coating. More specifically, the construction activities that would create a demand for water include watering soil for fugitive dust control, adding water to backfill material, spraying concrete, masonry, painting, and equipment and site clean up, among others. The 2010 UWMP states that the Town's water demand was 2,169 AFY in 2010 and 2,565 AFY in 2015. Construction activities are temporary in nature, do not require substantial amounts of water, and would not result in an increase in water demand that would require new entitlements or resources. As such, construction activities would result in a less than significant impact on the existing water supply and infrastructure.

Wastewater Generation

During all phases of construction, a private contracted vendor would provide and maintain portable toilets at the construction site. Typically, one 68-gallon portable toilet is provided for every ten persons at the construction site. The contracted vendor would empty the portable toilets once per week and dispose of the waste off-site. Construction personnel would generate a negligible amount of wastewater. Therefore, no measurable wastewater flows are anticipated and the existing wastewater capacity would not be constrained during project construction. In addition, no disruption of wastewater service is expected to occur as a result of construction activities. Therefore, construction activities would result in a less than significant impact on wastewater service and infrastructure.

Applicable 1999 SPEIR Mitigation Measures: No 1999 SPEIR mitigation measures are applicable to this topical area.

Additional Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact.

WATER SERVICES

USS-2 PROJECT IMPLEMENTATION WOULD INCREASE THE DEMAND FOR WATER AT THE PROJECT SITE.

Impact Analysis: The 1999 SPEIR (pages 5.10-20 through 5.10-23) concluded that the 1999 NVSP Amendment would increase water demand above existing conditions, requiring some existing water main pipelines to be upgraded and an incremental expansion of the existing water system. The 1999 SPEIR concluded that implementation of mitigation measures would reduce potential impacts to water systems and facilities to less than significant levels.

Project implementation would result in a long-term water demand for operational uses, including hotel rooms, food and beverage service, outdoor pool/jacuzzis, and landscaping. The average water use from meters servicing resort lodging with retail mixed use developments in the area, based on

three years (2008, 2009, and 2010), is approximately 1,673 gallons per day (gpd) (1.87 AFY).[8, 9] In addition, the irrigation usage is anticipated to be approximately 101 gpd (0.11 AFY).[10] Therefore the total water demand is 1,774 gpd (1.99 AFY).

As previously discussed, the amount of precipitation directly impacts water supply, including the supply during drought conditions. MCWD has analyzed existing and projected water supply in normal, single dry, and multiple dry years. According to MCWD, it has adequate water supply to meet community needs under the full range of water year types, including both the severe one year and sustained multi-year droughts. This is primarily due to the availability of local groundwater resources, which provides 40 percent of supply underaverage conditions, nearly 90 percent of the supply in a severe one year drought, and 60 percent of the supply over a three year sustained drought.

The MCWD anticipates it would be able to accommodate the proposed project's demand for water services in combination with other water demands throughout the Town with existing water supplies during normal, single-dry, and multiple-dry water years.[11] At the expected project completion date in 2015, the MCWD has projected an available water supply of 4,164 AFY in normal water years, and a projected demand of 2,989 AFY.[12] As the proposed project would create a demand of 1.99 acre-feet for an average year (less than one percent of the total projected demand), it is anticipated that an adequate supply of water is available for the project. Additionally, the proposed project would also be subject to the fire flow requirements specified by the Mammoth Lakes Fire Protection Department (MLFPD), which would be a minimum of 2,750 gallons per minute for a 2 hour period, and would need to provide 100 pounds per square inch (psi) of water pressure on the roof at all times.[13] The MCWD anticipates it would be able to provide adequate water supply to accommodate the fire flow requirements.[14] Further, it is important to note that the proposed projection would result in a decrease in anticipated water generation at the Mammoth Crossing site as a result of the proposed density transfer. Given the minimal increase in water generation from the project, water demand would not substantially increase compared to that analyzed in the 1999 SPEIR. Further, implementation of 1999 SPEIR Mitigation Measure 5.10-8 would ensure that the project complies with all appropriate regulations and fees from the Lahontan RWQCB, MCWD, state and local fire codes, and the Town's Municipal Code. As the 2010 UWMP indicates that available water sources particularly groundwater would be sufficient to serve the Town through 2030, the project's water demand would be met. Therefore, as the Town would have the necessary infrastructure and water supply to accommodate the proposed project, with implementation of the 1999 SPEIR Mitigation Measure 5.10-8, potential impacts to water demand, water supplies, and infrastructure would be reduced to less than significant levels.

[8] An acre-foot equals approximately 325,829 gallons.

[9] Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

[10] Written Correspondence from Benjamin Harth, Bull Stockwell Allen, May 20, 2014.

[11] Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

[12] Mammoth Community Water District, *2010 Urban Water Management Plan*, November 2011.

[13] Written Correspondence from Thom Heller, Fire Marshal/Division Chief, Mammoth Lakes Fire Protection District, May 7, 2014.

[14] Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

Applicable 1999 SPEIR Mitigation Measures: Modifications to the 1999 SPEIR mitigation measures are made in ~~strikethrough~~ and double underline text. The changes to the 1999 SEIR mitigation measures have been made to clarify/up-date the information and/or present the measure in a project-specific manner (as these measures are programmatic in nature).

5.10-8 Prior to building permit issuance, ~~T~~the project ~~a~~Applicant shall comply with all applicable Municipal and Fire Code requirements and pay the appropriate fees to the MCWD and MLFPD. ~~All new water conveyance facilities shall be installed within public rights-of-way or utility easements.~~

Additional Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

WASTEWATER SERVICES

USS-3 PROJECT IMPLEMENTATION WOULD RESULT IN AN INCREASE IN WASTEWATER GENERATION AT THE PROJECT SITE.

Impact Analysis: The 1999 SPEIR (pages 5.10-19 through 5.10-20) concluded that buildout of the 1999 NVSP Amendment would increase generated wastewater above existing conditions, presenting an increase in service demand for operations and maintenance of the sewer pipeline system and treatment facility. The 1999 SPEIR concluded that mitigation measures pertaining to issuance of a sewer permit and applicable fee payments prior to construction of any facilities would reduce potential impacts to wastewater systems and facilities to less than significant levels.

Project implementation would result in a long-term wastewater generation increase as a result of the proposed 67-room hotel. The wastewater collection system for the project site is connected to MCWD sewer lines along Canyon Boulevard, Minaret Road, and Lake Mary Road/Main Street. A preliminary evaluation of the potential wastewater generation at the site analyzed the proposed project and determined that the infrastructure could accommodate development on the project site.[15]

Based on mixed lodging and retail average water use for years 2008, 2009, and 2010 and excluding irrigation usage, the project's estimated annual indoor mixed use wastewater demands are approximately 1,673 gpd (1.87 AFY).[16] It is anticipated that wastewater generated from the proposed project site would be treated. The existing capacity at the MCWD wastewater treatment plant is rated at 4.3 mgd with an average daily flow of 1.4 mgd.[17] In 2010, the MCWD collected and treated 1,432 AFY of wastewater and in 2015 the projected future annual wastewater generation volumes amounted to 1,666 AFY (1.49 mgd). As the proposed project's estimated wastewater demands are approximately 1.87 AFY, it equates to 0.11 percent of increased wastewater generation, compared to the 2015 projections. The increased wastewater flows from the proposed project can be accommodated within the existing design capacity of the plant. Given the minimal increase in

[15] Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

[16] An acre-foot equals approximately 325,829 gallons.

[17] Written Correspondence from Karl Schnadt, Operations Superintendent, Mammoth Community Water District, May 15, 2014.

wastewater generation from the project, wastewater demand would not substantially increase compared to that analyzed in the 1999 SPEIR. Therefore, the proposed project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities that could cause significant environmental effects. Further, it should be noted that the proposed projection would result in a decrease in anticipated wastewater generation at the Mammoth Crossing site as a result of the proposed density transfer. .

In addition, implementation of 1999 SPEIR Mitigation Measure 5.10-7 would ensure that the project complies with all appropriate regulations and fees from the Lahontan RWQCB, MCWD, and the Town's Municipal Code. The project would result in a minimal increase of wastewater generation, which would not constrain the capacity of the existing wastewater infrastructure at the MCWD Wastewater Treatment Facility. Therefore, impacts regarding wastewater associated with project implementation would be reduced to less than significant levels.

Applicable 1999 SPEIR Mitigation Measures: Modifications to the 1999 SPEIR mitigation measures are made in ~~strikethrough~~ and double underline text. The changes to the 1999 SEIR mitigation measures have been made to clarify/up-date the information and/or present the measure in a project-specific manner (as these measures are programmatic in nature).

5.10-7 Prior to building permit issuance, ~~T~~the project ~~a~~Applicant shall comply with all applicable Municipal Code requirements and pay the appropriate fees to the MCWD. ~~All new wastewater conveyance facilities shall be installed within public rights-of-way or utility easements.~~

Additional Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

5.7.6 CUMULATIVE IMPACTS

- **DEVELOPMENT ASSOCIATED WITH THE PROPOSED PROJECT AND OTHER RELATED CUMULATIVE PROJECTS COULD RESULT IN CUMULATIVELY CONSIDERABLE IMPACTS TO THE WATER SUPPLY AND WASTEWATER GENERATION.**

Impact Analysis: Cumulative development could result in a substantial increase in the demand for utilities within the NVSP area. The 1999 SPEIR (page 5.10-24) concluded that with coordination and discussions with the appropriate service and utility agencies during the preliminary design stage, the build out of the 1999 NVSP Amendment would not result in substantial cumulatively considerable impacts. Further, each cumulative project would also coordinate with appropriate agencies to minimize impacts in this regard.

Development within the Town associated with the proposed project and related cumulative projects identified in Section 4.0, *Cumulative Projects*, would not result in significant cumulative impacts to utilities and service systems, which are further discussed as follows.

Water Supply

There are 22 projects proposed in the Town in addition to the proposed project. Implementation of cumulative projects would increase the water demand of MCWD. The 2010 UWMP has indicated that it can expect to meet the needs of its customers through 2030. Future projects would be evaluated by the responsible agency to determine the extent of impacts on existing water facilities in the region. Project implementation would result in a long-term water demand for operational uses, including hotel rooms, food and beverage service, outdoor pool/jacuzzis, and landscaping. Operation of the project would create a total water demand of approximately 1,773 gpd on an average day and annual water demand of approximately 1.99 AFY. The project's water demand would be served by MCWD, who anticipates the proposed project would be accommodated with existing water supplies. MCWD anticipates it would be able to accommodate the proposed project's demand for water services in combination with other water demands throughout the Town with existing water supplies during normal, single-dry, and multiple-dry water years.[18] Based upon the 2010 UWMP, the project's water demand represents 0.06 percent[19] of the projected water demand for the Town. As the 2010 UWMP indicates that available groundwater, surface water, and recycled water sources would be sufficient to serve the Town through 2030, the proposed project and the cumulative projects' water demand would be met. As discussed above, the proposed project would not result in substantial cumulatively considerable impacts pertaining to water demand, which is consistent with what was analyzed as part of the 1999 SPEIR. With implementation of 1999 SPEIR Mitigation Measure 5.10-8, cumulative projects compliance with regulations from the Lahontan RWQCB, MCWD, and the Town's Municipal Code would ensure the project would have less than significant impacts on the existing water system. Therefore, impacts to water supply would not be significantly cumulatively considerable.

Wastewater

Cumulative projects proposed within the Town would increase demand on existing wastewater facilities. Due to the minimal increase in wastewater flows from the project to MCWD Wastewater Treatment Plant, it is anticipated that existing facilities could serve the proposed project's wastewater generation, with consideration of MCWD Wastewater Treatment Plant's existing capacity. The wastewater flow associated with the proposed project and related cumulative projects are not anticipated to exceed levels associated with approved growth. As discussed above, the proposed project would not result in substantial cumulatively considerable impacts pertaining to wastewater demand, which is consistent with what was analyzed as part of the 1999 SPEIR. With implementation of 1999 SPEIR Mitigation Measure 5.10-7, cumulative projects compliance with regulations from the Lahontan RWQCB, MCWD, and the Town's Municipal Code would ensure the project would have less than significant impacts on the existing sewer system. Developers may also be required to contribute fees, on a project-by-project basis, for demand of new resources. Therefore, development of the proposed project, along with cumulative development, is not anticipated to result in significant cumulatively considerable impacts to wastewater services or facilities.

[18] Written correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

[19] Percentage obtained by dividing the *2010 Urban Water Management Plan's* water demand projections by the project's total water demand.

Applicable 1999 SPEIR Mitigation Measures: Refer to 1999 SPEIR Mitigation Measures 5.10-7 and 5.10-8.

Additional Mitigation Measures: No additional mitigation measures are required.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

5.7.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No unavoidable significant impacts related to utilities have been identified following implementation of the 1999 SPEIR mitigation measures referenced in this section.

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6.0 Other CEQA Considerations

6.0 OTHER CEQA CONSIDERATIONS

6.1 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

If the proposed project is approved and constructed, a variety of short- and long-term impacts would occur on a local level. During project construction, portions of surrounding uses may be temporarily impacted by dust and noise. There may also be an increase in vehicle pollutant emissions caused by grading and construction activities. However, these disruptions would be temporary and may be avoided or lessened to a large degree through mitigation cited in this SEIR and through compliance with the *Town of Mammoth Lakes Municipal Code* (Municipal Code); refer to Section 5.0, *Environmental Analysis*, and Section 8.0, *Effects Found Not To Be Significant*.

Ultimate development of the project site would create long-term environmental consequences associated with the proposed district zoning amendment and conditional use permit. Development of the proposed project and the subsequent long-term effects may impact the physical, aesthetic, and human environments. Long-term physical consequences of development include increased traffic volumes, increased noise from project-related mobile (traffic) and stationary (mechanical and landscaping) sources, hydrology and water quality impacts, and increased energy and natural resource consumption. Incremental degradation of local and regional air quality would also occur as a result of mobile source emissions generated from project-related traffic and stationary source emissions generated from the consumption of propane/natural gas and electricity.

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(c):

> *"[uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely, Primary impacts and, particularly, secondary impacts [such as highway improvement which provides access to a previously inaccessible area] generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*"

The project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Project construction would require

the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment.

The resources that would be committed during project operation would be similar to those currently consumed within the Town. These would include energy resources such as electricity and propane/natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. Project operation would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that limit the amount of energy consumed by the project. However, the energy requirements associated with the project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of hotel uses, including minor amounts of cleaning products along with the occasional use of pesticides and herbicides for landscape maintenance are the extent of materials anticipated to be utilized on-site. The use of these materials would be in small quantities and used, handled, stored, and disposed of in accordance with the manufacturer's instructions and applicable government regulations and standards. Although the proposed hotel operations are not anticipated to result in any releases of hazardous materials, compliance with these regulations and standards would ensure that significant and irreversible environmental change would not occur.

In summary, project construction and operation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. However, continued use of such resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area. As such, although irreversible environmental changes would result from the project, such changes would not be considered significant.

6.3 GROWTH-INDUCING IMPACTS

Section 15126 of the CEQA Guidelines requires that an EIR discuss the project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This section analyzes such potential growth-inducing impacts, based on criteria suggested in the CEQA Guidelines.

In general terms, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the following criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);

- Fostering economic expansion or growth (e.g., changes in revenue base and employment expansion);
- Fostering of population growth (e.g., construction of additional housing), either directly or indirectly;
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning, and general plan amendment approval); or
- Development of or encroachment on an isolated or adjacent area of open space (being distinct from an in-fill project).

Should a project meet any one of the above-listed criteria, it may be considered growth inducing. The potential growth-inducing impacts of the proposed project are evaluated below. Note that the CEQA Guidelines require an EIR to "discuss the ways" a project could be growth inducing and to "discuss the characteristics of some projects that may encourage…activities that could significantly affect the environment." However, the CEQA Guidelines do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages (refer to CEQA Guidelines Section 15145).

POPULATION, HOUSING, AND EMPLOYMENT

Population

County of Mono. The County encompasses approximately 3,030 square miles.[1] It is bordered by the State of Nevada to the northeast, Inyo County to the south, and the Counties of Fresno, Madera, Mariposa, Tuolumne, and Alpine to the west. As of January 2013, Mono County had a population of 14,493.[2] This represents an increase of approximately 10.4 percent over the County's January 2000 population of 12,853[3]; refer to Table 6-1, *Population Estimates*.

Table 6-1
Population Estimates

Year	Mono County	Town of Mammoth Lakes
Population		
2000[1]	12,853	7,093
2013[2]	14,493	8,307
Change	10.4%	17.1%

Source:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark.* Sacramento, California, May 2013.

[1] Mono County Website, http://www.monocounty.ca.gov/information.html, accessed April 30, 2014.

[2] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*, May 2013.

[3] State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.

Town of Mammoth Lakes. The Town of Mammoth Lakes (Town) was incorporated in 1984 and remains the only incorporated jurisdiction within Mono County. The Town's Municipal Boundaries include approximately 25 square miles of land. Approximately 4.5 square miles are within the Urban Growth Boundary (UGB). The Towns' population differs from other cities in that the majority of the Town's population consists of seasonal residents or visitors. The *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (2007 General Plan PEIR), dated May 2007, considers the people at one time (PAOT) to account for seasonal residents, second homes, and visitors along with the permanent residents. Due to the resort nature of the Town, the actual population of the Town is always greater than the permanent population, particularly during peak season (winter).

The Town's permanent 2000 population was an estimated 7,093 persons. As of January 2013, the Town's population reached an estimated 8,307 persons[4], an approximate 17.1 percent increase over the 2000 population. During the winter months, an average peak population of 34,264 is normal, which is over four times the permanent population.[5] The growth in PAOT is expected to continue in the Town, with and estimated PAOT increase reaching 60,700 persons by 2024.[6]

Project Site. The site is situated within the NVSP area (a developed area of the Town). The project site currently consists of a parking structure. Therefore, there is no population associated with the project site.

Housing

County of Mono. The County's housing stock was estimated to be 13,972 in January 2013. This represents an increase of approximately 18.8 percent over the estimated 11,757 housing units reported in January 2000.[7] The vacancy rate in January 2013 was estimated to be approximately 58.5 percent, with approximately 2.44 persons per household.[8] The high vacancy rate is reflective of the resort nature of the area and seasonal residents. Table 6-2, *Housing Estimates*, provides a summary of both 2000 and 2013 housing estimates for Mono County and the Town of Mammoth Lakes.

Town of Mammoth Lakes. The Town's housing stock was estimated to be 9,643 in January 2013. This represents an increase of approximately 21.1 percent over the estimated 7,960 housing units reported in January 2000. The vacancy rate in January 2013 was estimated to be approximately 66.5 percent.[9] Although it appears an excess supply of housing units exist in the Town, in actuality, a majority of the housing units are short-term seasonal units. Additionally, overcrowding conditions occur as a result of high rents and limited housing opportunities for permanent residents and the seasonal workforce. This is a reflection of the resort nature of the Town, and the fact that seasonal, recreational, and occasional use units account for a majority of the total housing units. According to

[4] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*, May 2013.

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

[6] Ibid.

[7] State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, April 30, 2014.

[8] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*, May 2013.

[9] Ibid.

the Department of Finance (January 2013), the number of persons per household for permanent residents in the Town is 2.52. The 2007 General Plan PEIR uses 4.0 persons per unit to account for the population occupying seasonal, visitor, lodging, and second home units. The number of housing units in the Town is expected to increase to 16,710 units by 2024 (General Plan buildout). This represents an approximately 73 percent increase in housing between 2013 and 2024.

Table 6-2
Housing Estimates

Year	Mono County	Town of Mammoth Lakes
Housing		
2000[1]	11,757	7,960
2013[2]	13,972	9,643
Change	18.8%	21.1%

Source:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*, May 2013.

Project Site. The project site is currently developed with a parking podium. No housing is currently associated with the property.

Employment

County of Mono. According to the California Employment Development Department, the annual average civilian labor force within Mono County totals approximately 8,110 as of March 2014. An estimated 8.0 percent of the County's workforce (650 persons) was unemployed.[10]

Town of Mammoth Lakes. According to the California Employment Development Department, the annual average civilian labor force within the Town of Mammoth Lakes totals approximately 4,720 persons as of March 2014. An estimated 5.3 percent of the Town's workforce (250 persons) was unemployed.[11] Recreation and tourism-based jobs and support services for workers and visitors account for the majority of the Town's employment. The majority of the Town's operating revenue is from Transient Occupancy Tax (TOT) and sales tax. The TOT is generated from the rental of a lodging facility for stays fewer than 30 days. In fiscal year 2012-2013, TOT revenues were 58 percent of General Fund revenues.

Project Site. As stated above, the project site currently consists of a parking podium and does not generate employment.

[10] California Employment Development Department, L*abor Force and Unemployment Rate for Cities and Designated Places*, March 2014.
[11] Ibid.

IMPACT ANALYSIS

A project could induce population growth in an area either directly or indirectly. More specifically, the development of new residences or businesses could induce population growth directly, whereas the extension of roads or other infrastructure could induce population growth indirectly.

The project is located in a developing area with the Town. Project implementation would result in the development of a 67-room hotel; refer to Section 3.0, *Project Description*. Based on the factors discussed below, project implementation would not result in significant growth-inducing impacts:

- *Removal of an Impediment to Growth*. The proposed project is the last phase of a three-phase development. The first two phases have been completed, as well as the 136-space parking structure. The project would be located atop the parking podium, adjoining the existing buildings. The project site is within the North Village District. Although the project would increase density on the site, it would accommodate the increase by transferring 30 rooms from one of the Mammoth Crossing sites. Therefore, the project would not result in overall growth beyond what is anticipated in the North Village Specific Plan (NVSP) and the 2007 General Plan.

  As the project site is already developed, transportation and infrastructure exist to serve the existing on-site and surrounding uses. The project would not require new roadways, sewer lines, or storm drain facilities to serve the project site and would not represent a removal of an impediment to growth.

- *Economic Growth*. As stated above, the project involves the development of a 67-room hotel with associated commercial square footage. During project construction, construction-related jobs would be created. However, these jobs would be temporary and would not be growth-inducing. During project operation, economic growth associated with the hotel rooms and commercial uses would be consistent with the 2007 General Plan with respect to the planned land use for the project site.

- *Population Growth*. A project could foster population growth in an area either directly (through the development of new homes) or indirectly (through the development of employment-generating land uses). The project proposes 67 hotel rooms above an existing parking podium. Therefore, the proposed project would foster both direct and indirect growth in the Town's population. As concluded above, transportation and infrastructure exist to serve the range of recreational, commercial, and residential uses in the project vicinity. The project does not involve the extension of roads or other infrastructure into undeveloped areas. Therefore, the project would not foster population growth through the extension of roads or other infrastructure. Given the proposed project would occur in accordance with the 2007 General Plan and 1999 SPEIR's anticipated development (with implementation of the proposed density transfer from one of the Mammoth Crossing sites), project implementation would be consistent with the Town's growth forecasts and would result in no greater impacts associated with population growth than previously analyzed. Therefore, the project would not result in substantial population growth in the Town.

- *Precedent-Setting Action*. As demonstrated in Section 5.1, *Land Use and Relevant Planning*, the proposed project would require a District Zoning Amendment to allow development of the proposed project. However, the amendments proposed would apply solely to the project site. Further, due to the nature of the project and minimal amount of population growth anticipated to be generated, the proposed project would not be considered growth inducing with respect to a precedent-setting action.

- *Development or Encroachment of Open Space*. The proposed project would not be growth-inducing with respect to development or encroachment into an isolated or adjacent area of open space. The proposed project would be developed on top of an existing parking structure podium. Additionally, development of the project site has been identified in the 1999 SPEIR and anticipated by the Town's 2007 General Plan. The project site is zoned North Village Specific Plan (NVSP), Resort General (RG), according to the Town's *Official Zoning Map* and the *North Village Specific Plan Zoning*. According to the 2007 General Plan, the NVSP is intended to create a visitor-oriented entertainment retail and lodging district anchored by a pedestrian plaza and a gondola connection to Mammoth Mountain Ski Area. Proposed development would be contained within the project site and would not encroach into surrounding areas or any areas designated as Open Space. No impacts would result with regard to development or encroachment of open space.

Overall, project implementation would not be considered growth inducing, inasmuch as it would not foster significant unanticipated economic expansion and growth opportunities. The project would not remove an existing impediment to growth and would not develop or encroach into an isolated or adjacent area of open space. The proposed project would not foster significant unanticipated population growth in the project area, as described above. Development within the project site would not require substantial development of unplanned and unforeseen support uses and services.

In addition to inducing growth, a project may create a significant environmental impact if it would displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere and/or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Implementation of the proposed project would not displace substantial numbers of existing housing or persons, as no dwelling units are currently located at the project site. Therefore, the project would not result in an impact with regard to the displacement of persons, housing, and businesses.

6.4 ENERGY CONSERVATION

Public Resources Code Section 21100(b)(3) and CEQA Guidelines Appendix F requires a description (where relevant) of the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, the California State Legislature adopted Assembly Bill 1575 (AB 1575) in response to the oil crisis of the 1970s. Appendix F of the State CEQA Guidelines provides guidance for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. Because Appendix F does not include specific significance criteria, this threshold is based on the goal of Appendix F. Therefore, an energy impact is considered significant if the proposed project would:

> *Develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation.*

6.4.1 PROJECT ENERGY CONSUMPTION

SHORT-TERM CONSTRUCTION

In 1994, the U.S. Environmental Protection Agency (EPA) adopted the first set of emission standards (Tier 1) for all new off-road diesel engines greater than 37 kilowatts (kW). The Tier 1 standards were phased in for different engine sizes between 1996 and 2000, reducing NO_X emissions from these engines by 30 percent. The EPA Tier 2 and Tier 3 standards for off-road diesel engines are projected to further reduce emissions by 60 percent for NO_X and 40 percent for particulate matter from Tier 1 emission levels. As the project proposes the development of 67 hotel rooms and accessory uses on top of the existing parking structure podium, construction would primarily involve building, paving, and painting activities. Table 6-3, *Construction Fuel Consumption*, provides an estimate of construction fuel consumption for the project based on information provided by the California Emissions Estimator Model (CalEEMod); refer to Appendix 11.4, *Air Quality and Greenhouse Gas Emissions Data*.

Table 6-3
Construction Fuel Consumption

Phase	Equipment	Quantity	Horsepower	Load Factor	Fuel Consumption Rate[1] (gallons per hour)	Duration[2] (total hours)	Total Fuel Consumption[3,4] (gallons)
Demolition	Concrete/Industrial Saws	1	81	0.73	2.37	56	132
	Rubber Tired Dozers	1	255	0.40	4.08	56	228
	Tractors/Loaders/Backhoes	3	97	0.37	1.44	168	241
Grading	Graders	1	174	0.41	2.85	176	502
	Rubber Tired Dozers	1	255	0.40	4.08	176	718
	Tractors/Loaders/Backhoes	2	97	0.37	1.44	308	442
Building	Cranes	1	226	0.29	2.62	1,760	4,614
	Forklifts	2	89	0.20	0.71	3,080	2,193
	Generator Sets	1	84	0.74	2.49	1,760	4,376
	Tractors/Loaders/Backhoes	1	97	0.37	1.44	1,320	1,895
	Welders	3	46	0.45	0.83	5,280	4,372
Paving	Cement and Mortar Mixers	1	9	0.56	0.20	32	6
	Pavers	1	125	0.42	2.10	32	67
	Paving Equipment	1	130	0.36	1.87	32	60
	Rollers	2	80	0.38	1.22	64	78
Architectural Coating	Air Compressors	1	78	78	0.48	1.50	366
TOTAL							***20,520***

Notes:
1. Derived using the following equation:
   Fuel Consumption Rate = Horsepower x Load Factor x Fuel Consumption Factor
   Where:
   Fuel Consumption Factor for a diesel engine is 0.04 gallons per horsepower per hour (gal/hp/hr) and a gasoline engine is 0.06 gal/hp/hr.
2. Total hours of duration derived from CalEEMod modeling results; refer to Appendix 11.6, *Air Quality and Greenhouse Gas Data*.
3. Total Fuel Consumption calculated using the following equation:
   Total Fuel Consumption = Duration in Hours x Fuel Consumption Rate
4. Values may be slightly off due to rounding.

Source: Refer to Appendix 11.4, *Air Quality and Greenhouse Gas Data*, for CalEEMod assumptions used in this analysis.

As depicted in Table 6-3, project construction would consume a total of approximately 20,520 gallons of fuel. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Additionally, the 1999 SPEIR Mitigation Measure 5.5-1b requires compliance with CARB anti-idling regulations to reduce unnecessary emissions. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

LONG TERM OPERATIONS

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Since 1990, the fuel economy standard for new passenger cars has been 27.5 miles per gallon (mpg). Since 1996, the fuel economy standard for new light trucks (gross vehicle weight of 8,500 pounds or less) has been 20.7 mpg. Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. In 2009 the fuel economy standards were updated to 39 mpg for cars and 30 mpg for trucks for model year 2016. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States.

Trip generation rates and the daily vehicle miles traveled (VMT) provided in Appendix 11.4, *Air Quality and Greenhouse Gas Data*, were used to estimate vehicle fuel consumption associated with trips generated by the proposed project. Table 6-4, *Project Operational Fuel Consumption*, provides an estimate of the daily fuel consumed by vehicles traveling to and from the proposed project.

Table 6-4
Project Operational Fuel Consumption

Vehicle Type	Percent of Vehicle Miles Traveled[1]	Daily Trips[2]	Daily Vehicle Miles Traveled[3]	Average Fuel Economy (miles per gallon)[4]	Total Daily Fuel Consumption (gallons)[5]
Passenger Cars	75	141	1,112	21.6	51
Light/Medium Trucks	14	26	208	17.2	12
Heavy Trucks/Other	11	21	163	6.1	27
Total[6]	***100***	***188[7]***	***1,483***	**--**	***90***

Notes:
1. Percent of Vehicle Trip distribution based on trip characteristics within CalEEMod.
2. Daily Trips calculated by multiplying the total daily trips by percent vehicle trips (i.e., Daily Trips x percent of Vehicle Trips).
3. Daily Vehicle Miles Traveled (VMT) calculated by multiplying percent vehicle trips by total VMT (i.e., VMT x percent of Vehicle Trips).
4. Average fuel economy derived from the Department of Transportation.
5. Total Daily Fuel Consumption calculated by dividing the daily VMT by the average fuel economy (i.e., VMT/Average Fuel Economy).
6. Values may be slightly off due to rounding.
7. Based upon data within the *Inn at the Village Project – Traffic Study*, prepared by LSA Associates, Inc., dated May 8, 2014; refer to Appendix 11.2, *Traffic Study*.
8. Total VMT are the reduced VMT (from project design features) obtained from the CalEEMod model.

Source: Refer to Appendix 11.4, *Air Quality and Greenhouse Gas Data*, for trip generation rates and VMT used in this analysis.

As indicated in Table 6-4, the operation of project is estimated to consume approximately 90 gallons of fuel daily. However, the project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. The project is located in close proximity to existing transit. Fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Alternative Transportation Options

The project site is served by bus transit lines operated by the Eastern Sierra Transit Authority (ESTA) along various roadways surrounding the project site including Main Street/Lake Mary Road, Minaret Road, and Canyon Boulevard. The proximity of the project site to ESTA routes would reduce the number of trips to and from the project. The proposed project would not result in the inefficient, wasteful, or unnecessary consumption of transportation energy.

Building Energy Demand

The proposed project would be expected to demand approximately 827 megawatt hours (MWh) of electricity per year and approximately 2,434,050 kilo British Thermal units (kBTU) of propane/natural gas per year. These figures were obtained from Appendix 11.4, *Air Quality and Greenhouse Gas Data*.

The project would involve operations typical of hotel uses, requiring electricity and natural for typical lighting, climate control, and day-to-day activities. Additionally, as stated in Section 5.6, *Greenhouse Gas Emissions*, the proposed project would incorporate several energy efficiency measures, including a LEED certifiable structure. Therefore, the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Energy Efficiency Measures

Title 24, California's Energy Efficiency Standards for Residential and Non-residential Buildings, was established by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. In 2013, the CEC updated Title 24 standards with more stringent requirements. The 2013 Standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and propane/natural gas use. Additional savings result from the application of the Standards on building alterations. For example, requirements for cool roofs, lighting, and air distribution ducts are expected to save about additional of electricity. These savings are cumulative, doubling as years go by.

Additionally, implementation of the project's design features (i.e., high efficiency lighting, energy efficient appliances, low-flow faucets, toilets, and showers, water-efficient irrigation systems, and exclusion of hearths) would further reduce energy consumption.

The project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards, as well as the project's design features. The proposed project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

7.0 Alternatives to the Proposed Project

7.0 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with CEQA Guidelines Section 15126.6, this section describes a range of reasonable alternatives to the project, or to the location of the project. The analysis focuses on alternatives capable of avoiding or substantially lessening the project's significant environmental effects, even if the alternative would impede, to some degree, the attainment of the proposed project objectives, or would be more costly. The range of required alternatives is governed by the "rule of reason" that requires the analysis to set forth only those alternatives necessary to permit a reasoned choice. The alternatives are limited to ones that would avoid or substantially lessen any of the project's significant effects. Of those alternatives, only the ones that the lead agency has determined could feasibly attain most of the basic project objectives are examined in detail.

TOWN GOALS AND OBJECTIVES

The Town is comprised of 12 districts and four mountain portals, as described in the Neighborhood and District Character Element of the 2007 General Plan. Master planning of these specific districts provides a basis for future land use decisions incorporating the goals, policies, and actions in the Land Use and Community Design Elements as well as the Neighborhood and District Character Element. The characteristics of each district provide a sense of place regarding structure, function, and a district center. The project site is located in the North Village District and the identified characteristics for this district are as follows:

- Viewsheds to Sherwin Range and the Knolls are preserved;
- Landscape that recalls the Eastern Sierra and establishes scale and street edge;
- Create a sense of exploration using pedestrian-oriented sidewalks, plazas, and courtyards with pedestrian comforts;
- Easy pedestrian access across main streets;
- Gateway intersection at Minaret Road and Main Street/Lake Mary Road;
- Visitor-oriented entertainment retail district;
- Active day and evening through all four seasons, designed to achieve a two to three hour visit;
- Resort and resident activities, amenities, and services;
- Animation with retail and significant businesses oriented to the street;
- Retail and services in "storefront" setting located at the sidewalk;

- A variety of resort lodging supported by meeting facilities, outdoor activities, and restaurants, arts, culture, and entertainment;
- Create year-round non-vehicular links to mountain portals;
- Lake Mary Road connected to the North Village District by trails;
- Shared and pooled parking, convenient structured parking, and small-scale street adjacent surface parking; and
- Encourage living and working in close proximity to transit-oriented development.

NORTH VILLAGE SPECIFIC PLAN GOALS AND OBJECTIVES

The North Village Specific Plan (NVSP) aims to create a set of land use designations and development standards which facilitate the development (or renovation) of the NVSP area as a concentrated, pedestrian-oriented activity center with limited vehicular access. The NVSP is intended to achieve year-round uses and visitor activity, strengthen the existing winter visitor market, and improve Mammoth's attractiveness to spring, summer, and fall resort visitors. The key objective of the NVSP, and consequently the Land Use Element, is to enhance the Town's image as a destination resort community, through the creation of a high profile, pedestrian-oriented, resort activity center where lodging, restaurants, shopping, housing, and recreational opportunities are located within proximity to one another and easily accessible by transit.

There are six land use districts established within the NVSP. As previously noted, the project site is located in the NVSP, Resort General (RG) district. RG district has been assigned to parcels adjacent to and easily accessible to the plaza, but still within the Pedestrian Core Overlay area. The Pedestrian Core area is intended to be a mixed-use village with commercial uses on the ground level and accommodation units on upper floors. The scale of the individual ground level shops vary. RG uses are intended to provide visitor-oriented resort services, but retail uses are limited to multi-tenant complexes or within full-service hotels. Restaurants are generally the only freestanding uses permitted in the NVSP RG district.

The RG objectives identified in NVSP are as follows:

- To provide resort accommodations and supporting commercial facilities for visitor-oriented activities and facilities;
- To provide a transition zone between the Plaza Resort and Specialty Lodging uses within North Village and surrounding residential uses; and
- To provide integrated pedestrian access to and from the plazas.

PROJECT GOALS AND OBJECTIVES

The intent of the proposed project is to create a better relationship and integration with Minaret Road, with a signature street level pedestrian porte cochere and other features that would animate

the streetscape and serve as an inviting portal into the proposed hotel. In a commitment to help the NVSP area realize its place-making potential, the key goals and objectives of the project are to:

- Greatly improve the project's relationship with the streetscape by introducing the porosity that allows for ease of pedestrian integration with Minaret Road;
- Populate and animate this section of Minaret Road and allow for ease of access to and from the proposed hotel amenities via the inviting pedestrian porte cochere;
- Provide streetscape features, including an informational kiosk and a pocket park;
- Deliver much needed critical mass in terms of hot beds to substantively help the North Village achieve economic sustainability;
- Provide an array of services and amenities that make the North Village a much more compelling destination for tourists and locals alike;
- Eliminate the need for any additional curb cuts along Minaret Road, which would be disruptive to pedestrian flows, by utilizing the existing vehicular access to Building C off of Canyon Boulevard;
- Improve the animation and vibrancy of the streetscape along Minaret Road with the addition of terraces for casual gathering or dining;
- Provide an array of amenities and related back-of-the-house functions that would allow for the inn to operate efficiently and attract an experienced and quality hotel operator to reinforce 8050's quality as a compelling year-round destination for visitors and locals alike;
- Deliver a LEED certifiable project consistent with the shared environmental values of the Town and the Applicant;
- Utilize a contextually sensitive architectural vernacular that departs from the repetitive and mostly uninspiring design solutions associated with earlier generation lodging properties within the community;
- Deliver a project that takes into account snow country design issues and constraints; and
- Produce a compelling, iconic, and economically sustainable lodging project that acts as a catalyst for the revitalization and added vibrancy of the North Village.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the

proponent). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As discussed throughout Section 5.0, *Environmental Analysis*, the proposed project would not result in any significant and unavoidable impacts, as all potential impacts were concluded to be less than significant or reduced to a less than significant levels with implementation of the Town's standards and regulations, the applicable 1999 SPEIR Mitigation Measures, and/or the recommended Additional Mitigation Measures.

Since no significant and unavoidable impacts were found, all potential environmental impacts that were considered in this SEIR are being analyzed in comparison with the following alternatives:

- No Project/No Development Alternative;
- No Project/Reasonably Foreseeable Development Alternative; and
- Reduced Height Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issues area, as examined in Section 5.0 of this SEIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. The end of this section provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed project. This section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Section 7.3, *Environmentally Superior Alternative*, references the "environmentally superior" alternative, as required by the CEQA Guidelines.

7.1 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this SEIR. Per CEQA Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

7.1.1 1999 SPEIR ALTERNATIVES

The project site is part of the NVSP. The NVSP was adopted in 1991 and has been amended several times. The NVSP establishes development regulations for approximately 64 acres located around Minaret Road, Main Street/Lake Mary Road, and Canyon Boulevard. The intent of the NVSP is to develop a cohesive, pedestrian-oriented resort activity node, and to provide a year-round focus for visitor activity within the town.

Several projects have been approved under the NVSP, resulting in the development or redevelopment of various properties in the area. One of these projects is the 8050 project (encompassing the project site), which consists of a three-phased development. The certified 1999 SPEIR was found to adequately cover and address the 8050 project. The first two phases of the 8050 project, Buildings A and B, have been completed, as well as the parking structure that would serve all three phases, Buildings A, B, and C. On April 27, 2005, the Planning Commission of the Town of Mammoth Lakes approved Tentative Tract Map 36-229 and Use Permit 2005-01, which approved Building C, the third and final building in the 8050 complex. The requisite building permit was subsequently issued by the Town to allow for construction of the approved Building C, which totaled 41,134 square feet and included 21 residential condominiums with a total of 33 bedrooms. The proposed Inn at the Village project is a redesign of Building C. The analyses that were conducted as part of the 1999 SPEIR that were considered by the Town, but were rejected as infeasible, are discussed below. It encompasses the alternative development scenarios that were considered, and presents the findings of the environmental impact analyses that were conducted.

1999 SPEIR Chapter 7, *Alternatives to the Proposed Project*, analyzed the following alternatives to the project or to the location of the project:

- *No Project Alternative*. This alternative consisted of the buildout of the 1994 NVSP. The 1994 NVSP included 41 separate parcels under several separate ownerships, totaling 64.1 acres. It created a set of land use designations and development standards to facilitate the development of the NVSP area as a concentrated, pedestrian-oriented activity center with limited demand for automobile use. Buildout of the 1994 NVSP would have resulted in the development of up to 3,020 accommodation rooms, in addition to affordable housing, and 135,000 square feet of commercial uses. The overall NVSP density would be approximately 54 rooms per acre based on three land use districts, the highest intensity district permitting a maximum of 80 rooms per acre and the lowest intensity district permitting a maximum of 48 rooms per acre. While the proposed types of land uses would be similar between the 1994 and 1999 NVSP Amendment, the orientation and distribution of uses differed with the 1999 NVSP Amendment. Despite the differences in development standards and distribution, the No Project Alternative would fulfill the primary project objectives outlined for the 1999 NVSP Amendment.

- *Reduced Density Alternative*. The Reduced Density Alternative assumed a 30 percent reduction in the overall density (square footage) of the 1999 NVSP Amendment. The density reduction would occur proportionally for all permitted land use types. The overall distribution of uses would remain the same as the 1999 NVSP Amendment. The Reduced Density Alternative would fulfill the primary project objectives for the 1999 NVSP Amendment to a lesser degree because of the reduction in size.

- *Alternative Site Alternative*. The Alternative Site Alternative assumed the construction of the same proposed land uses under the 1999 NVSP Amendment on the Lodestar at Mammoth Master Plan site. The Lodestar at Mammoth site is bordered to the north by Main Street, to the south by Meridian Boulevard and Minaret Road, to the west by Lake Mary Road and to the east by Joaquin Road. In May 1991, a Master Plan for development within the area of Lodestar at Mammoth Master Plan was prepared including land use development standards and conditions of approval for all development. A Final EIR was prepared in February 1991 and subsequently certified in April 17, 1991 for the Master Plan based on construction of a

210-acre master planned destination resort, which includes 40 single-family homes, 735 multi-family condominiums, 100 lodges and apartments (employee housing), 515,600 square feet of full-service hotels, an 80,000 square feet commercial village, and a 110-acre 18-hole golf course. Although the Alternative Site Alternative would result in the same amount and type of development proposed, it would not fulfill the primary project objectives of the 1999 NVSP Amendment to facilitate the development (or renovation) of NVSP area as a concentrated, pedestrian oriented activity center with restricted vehicular access.

Based on the analysis presented in Chapter 7 of the 1999 SPEIR, the No Project Alternative was identified as the environmentally superior alternative. CEQA Section 15126.6 indicates that if the "No Project" Alternative is the "Environmentally Superior" Alternative, the EIR should also identify an environmentally superior alternative among the alternatives. As the Reduced Density Alternative would result in the least environmental impacts when compared to the 1999 NVSP Amendment project while still meeting many of the project objectives and not increasing the significance of anticipated impacts, the Reduced Density Alternative was considered the Environmentally Superior Alternative.

As these alternatives do not focus analysis on a project-level basis, the three alternatives analyzed in the 1999 SPEIR have been considered, but rejected from further consideration.

7.1.2 ALTERNATIVE DEVELOPMENT AREAS

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. Per CEQA Guidelines Section 15126.6(2)(A), the key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the SEIR. In general, any development of the size and type proposed by the Inn at the Village project would have substantially the same impacts on an environmental basis. Without a site specific analysis, impacts on aesthetics, air quality, greenhouse gas emissions, land use and planning, and utilities and service systems cannot be evaluated. However, it could be inferred that other impacts, such as biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, etc., could result in increased impacts, as an alternative site would most likely be undeveloped. The Applicant has a vested right to develop the proposed project on the 8050 Building C project site, pursuant to the building permit issued under the approved Tentative Tract Map 36-229 and Use Permit 2005-01, which approved Building C, the third and final building in the 8050 complex. Although the Applicant does own other properties in the NVSP area, these other properties are not yet entitled for future development (Mammoth Crossing sites located to the south of the project site). Furthermore, it is a key objective of the proposed project, and a key aspect of its design, to enhance pedestrian integration and accessibility while improving animation and vibrancy of the streetscape along Minaret Road at the project site. Consequently, this alternative has been considered and rejected from further analysis.

7.2 ALTERNATIVES CONSIDERED FOR FURTHER ANALYSIS

Based on the criteria set forth in the CEQA Guidelines Section 15126.6 and the new information considered in this SEIR, the "No Project/No Development" Alternative, the "No Project/No Reasonably Foreseeable Development" Alternative, and the "Reduced Height" Alternative were selected and are analyzed in detail in the following sections.

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Section 7.3 identifies the Environmentally Superior Alternative.

7.2.1 "NO PROJECT/NO DEVELOPMENT" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

This alternative assumes that the existing 8050 project would remain in the current state, with Buildings A and B of the project completed as well as the 136-space parking structure that serves the project site. The project site would remain the parking structure podium, and no development would be constructed atop. The seven-story hotel, totaling 64,750 gross square feet that includes up to 67 hotel rooms, food and beverage service, spa, outdoor pool/jacuzzis, lobby, and landscaping elements would not be developed. Under this alternative, the signature pedestrian porte cochere, allowing for pedestrian integration and improved circulation and a visitor serving public kiosk or retail space at street level would not be constructed. Additionally, the existing sidewalk along Minaret Road would not be reconstructed to Town standards.

The following discussion evaluates the potential environmental impacts associated with the No Project/No Development Alternative, as compared to the impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the No Project/No Development Alternative, no development would occur within the existing 8050 project Phase C; therefore, no amendments to the NVSP are proposed under this Alternative. With the No Project/No Development Alternative, the density transfer from the nearby Mammoth Crossing property, the zoning amendment to increase the maximum permitted height, and the zoning amendment to reduce the front yard setback area would not be required. Therefore, the project's proposed density transfer and NVSP amendments would not be implemented. In addition, new land use approvals and permits including a Tentative Tract Map, Conditional Use Permit; Design Review Permit; and Final Map, among others would not be required.

Although the No Project/No Development Alternative would not require amendments to the NVSP, this Alternative would also not implement some of the policies and objectives of the General Plan and NVSP, which identify the need to provide integrated pedestrian access to and from the plazas, provide a variety of resort oriented lodging and limited commercial uses, and provide convenient, safe pedestrian connections to the rest of the North Village area, transit facilities, and ski lifts, and to provide animated streets with pedestrian amenities. Therefore, the No project/No Development Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use and relevant planning.

Aesthetics

The existing visual character of the project site is illustrated on the following exhibits: Exhibit 5.2-2, *Existing Character of the Project Site*, Exhibit 5.2-4, *Key View 1 - Existing Condition*; and Exhibit 5.2-5, *Key View 2 - Existing Condition*. The short-term visual impacts associated with demolition, grading, paving, and construction activities that would occur with the proposed project would not occur with the No Project/No Development Alternative. Therefore, the project's construction-related impacts to the visual character/quality of the project site and its surroundings would be avoided.

The project site's long-term visual character would be altered with the proposed project, as a new 67-room hotel would be constructed on top of the existing parking structure podium. The new structure would extend 18 feet or more above the surrounding structures, with the exception of the Westin, to the west, which is of similar height. Further, the upper floors of the new structure would appear to slightly encroach more onto Minaret Road as a result of the proposed setback reductions. No increased view blockage, compared to that analyzed in the 1999 SPEIR would occur. Pedestrian features (i.e., pedestrian porte cochere, improved sidewalk, landscaping, public kiosk, and public pocket park) would be constructed along Minaret Road in order to increase the pedestrian-friendly scale of the environment and connectivity within the NVSP area. The project site's shade and shadow patterns would be altered with the proposed project, as the new hotel development would cast new shadows on nearby public streets and sidewalks.

The long-term visual character of the project site and surrounding area would not be altered with the No Project/No Development Alternative, as no new development would occur and the project site would remain in its current condition. No increased building heights or reduced setbacks would occur on-site. Pedestrian improvements along Minaret Road would not be constructed. The existing shade and shadows patterns would not be altered with the No Project/No Development Alternative. Although the project would result in less than significant impacts to scenic views, visual character/quality, light/glare, and shade/shadow patterns with implementation of the 1999 SPEIR Mitigation Measures and recommended Additional Mitigation Measures, the No Project/No Development Alternative would avoid all impacts in this regard.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding aesthetics/light and glare, given it would avoid impacts to scenic views/vistas, short-term visual character/quality, long-term visual character/quality, light/glare, and shade/shadow.

Traffic/Circulation

Existing peak hour intersection and roadway operating conditions were evaluated in the Traffic Study; refer to Section 5.3, *Traffic/Circulation*. All study intersections and roadway segments are currently operating at an acceptable level of service (LOS) (LOS D or better) with the exception of Canyon Boulevard north of Lake Mary Road (LOS F) during the peak hours based on the Town of Mammoth Lakes and Caltrans analysis methodologies and performance criteria. These existing conditions would continue with the No Project/No Development Alternative, similar to the proposed project. Project implementation would result in less than significant impacts at intersections. The increase in average daily traffic (ADT) projected to occur with the proposed project would not occur with this Alternative, as the proposed project would not be developed. Therefore, although less than significant, the project's impacts to study area intersections and roadways would be avoided.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding traffic and circulation, given it would result in no increase in ADT and no traffic impacts at intersections or roadways.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Construction-related short-term noise and vibration impacts would not occur with the No Project/No Development Alternative. Therefore, the short-term construction-related noise and vibration impacts that would occur with the proposed project would be avoided with this Alternative.

Existing modeled noise levels would range from 59.1 dBA to 65.6 dBA at 100 feet from the roadway centerline. These existing conditions would continue with the No Project/No Development Alternative, although these existing conditions may be impacted by additional growth in the area. Project implementation would result in less than significant impacts from mobile noise sources. The increase in ADT projected to occur with the proposed project would not occur with this Alternative, as the proposed hotel and accessory uses would not be developed. Therefore, although less than significant, the project's long-term noise impacts from mobile sources would be avoided.

These existing conditions would continue with the No Project/No Development Alternative. Project implementation would result in less than significant impacts from stationary noise sources. The increased noise from the proposed project, which would be typical of commercial, retail, and hotel uses, would not occur with this Alternative, because the proposed hotel and accessory uses would not be developed. Therefore, although less than significant, the project's long-term noise impacts from stationary sources would be avoided.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding noise, since it would result in no short-term construction-related or long-term operational mobile or stationary source noise impacts.

Air Quality

Table 5.5-5, *Maximum Daily Pollutant Emissions During Construction*, presents the project's anticipated daily short-term construction emissions and indicates that impacts would be reduced to a less than significant level with implementation of mitigation. Short-term air quality impacts from demolition, grading, and construction activities would not occur with the No Project/No Development Alternative. Therefore, the short-term air quality impacts that would occur with the proposed project would be avoided with this Alternative.

The proposed project would not exceed the Mojave Desert Air Quality Management District's (MDAQMD) emissions thresholds (utilized since the Great Basin Unified Air Pollution Control District [GBUAPCD] does not currently have a preferred methodology), as indicated in Table 5.5-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would not occur with the No Project/No Development Alternative. Therefore, the air quality emissions that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding air quality, given it would result in no short- or long-term air quality impacts.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, *Greenhouse Gas Emissions*, project implementation would result in 738.57 metric tons of carbon dioxide equivalent per year ($MTCO_2eq/yr$), which is below the 900 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational greenhouse gas (GHG) emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would not occur with the No Project/No Development Alternative. Therefore, the GHG emissions that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding GHG emissions, since no GHG emissions would occur.

Utilities and Service Systems

Implementation of the proposed project would place increased demands upon utilities and service systems consisting of water and wastewater (sewers). The No Project/No Development Alternative would result in none of the impacts associated with increased demands upon utilities and service systems, because no new land uses would be developed. Therefore, the increased demands upon utilities and service systems that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Development Alternative would be environmentally superior to the proposed project regarding utilities and service systems, given no impacts to utilities and service systems would occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/No Development Alternative would not attain most of the project's basic objectives. This Alternative would not meet the Town's goals and objectives pertaining to creating a sense of exploration using pedestrian-oriented sidewalks, plazas, and courtyards with pedestrian comforts; a visitor-oriented entertainment retail district; active day and evening through all four seasons, designed to achieve a two to three hour visit; resort and resident activities, amenities, and services; animation with retail and significant businesses oriented to the street; retail and services in "storefront" setting located at the sidewalk; and a variety of resort lodging supported by meeting facilities, outdoor activities, and restaurants, arts, culture, and entertainment.

The goals and objectives of the NVSP would not be fully realized with implementation of the No Project/No Development Alternative. This Alternative would not provide resort accommodations and supporting commercial facilities for visitor-oriented activities and facilities or integrated pedestrian access to and from the plazas.

This Alternative would not meet many of the project's objectives, including the objectives to construct a compelling, iconic, and economically sustainable lodging development that would revitalize and enhance vibrancy to the NVSP area by providing greater pedestrian integration and accessibility for tourists and locals. An array of services and amenities including dining, casual gathering places, publically accessible landscaped spaces, and visitor accommodations for the residents and visitors of the Town would not be provided at the project site. The No Project/No Development Alternative would also not achieve economic sustainability by creating Town revenue through transient occupancy tax.

7.2.2 "NO PROJECT/ REASONABLY FORESEEABLE DEVELOPMENT" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The No Project/Reasonably Foreseeable Development Alternative proposes the development of new private residential condominiums on the project site as currently permitted (the approved 8050 Building C), which would total 41,134 square feet including 21 residential condominiums with a total of 33 bedrooms and would be five stories (62 feet) in height. The development associated with this alternative would have a broader building mass, covering the entire existing parking structure podium. The No Project/Reasonably Foreseeable Development Alternative would be consistent with the NVSP and amendments would not be required.

Table 7-1, *Comparison of Proposed Project and No Project/Reasonably Foreseeable Development Alternative*, compares the land use type and overall building height of the proposed project and the No Project/Reasonably Foreseeable Development Alternative. Comparatively, this alternative proposes 21 residential condominiums with 33 rooms, resulting in a difference in land use type and a decrease of 23,616 square feet from the proposed project. This Alternative would not require a density transfer from the Mammoth Crossing zone. In addition, this Alternative proposes a maximum height of five stories (62 feet) plus another three feet for roof appurtenances, a decrease of 18 feet and an additional one foot, six inches for roof appurtenances from the proposed project. The Alternative's maximum height would be consistent with the current NVSP. As this Alternative has a

wide building mass, this Alternative would have increased building footprint that increases the proposed building massing along the adjacent Fireside at the Village condominiums to the south. Under the No Project/Reasonably Foreseeable Development Alternative, the architecture and landscaping components would be developed as residential condominiums (with fractional ownership) similar to the existing 8050 Buildings A and B. In addition, the remaining accessory components (i.e., food and beverage service, spa, outdoor pool/jacuzzis, lobby, and pedestrian porte-cochere) would not be developed, since this Alternative would not function as a more traditional hotel operation.

Table 7-1
Comparison of Proposed Project and No Project/ Reasonably Foreseeable Development Alternative

Land Use	Proposed Project	No Project/Reasonably Foreseeable Development Alternative
Hotel Rooms[1]	34,840 square feet (67 rooms)	-
Accessory Uses (e.g., lobby, circulation, etc.)	29,910 square feet	-
Residential Condominiums	-	41,134 square feet (21 residential condominiums, 33 rooms)
Building Height	80 feet[2]	62 feet[3]

Notes:
1. The hotel proposes rooms that would be approximately +/- 520 square feet per room.
2. Building height for the proposed project excludes an additional 4 feet and 6 inches for roof appurtenances.
3. Building height for the No Project/Reasonably Foreseeable Development Alternative excludes an additional 3 feet for roof appurtenances.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the No Project/Reasonably Foreseeable Development Alternative, the project site would be developed with the current permitted 8050 Building C, allowed under the current NVSP. No amendments to the NVSP would be required. Given the previous permits and approvals obtained for the 8050 Building C, the No Project/Reasonable Foreseeable Development Alternative would not require the land use approvals and permits, as these were already obtained. Therefore, the project's proposed NVSP amendments, land use approvals and permits including a Tentative Tract Map, Conditional Use Permit; Design Review Permit; and Final Map required for the proposed project, would not be implemented under the No Project/Reasonable Foreseeable Development Alternative.

Although the No Project/Reasonably Foreseeable Development Alternative would not require amendments to the NVSP, this Alternative would also not implement some of the policies and objectives of the General Plan and NVSP, which identify the need to provide integrated pedestrian access to and from the plazas and provide convenient, safe pedestrian connections to the rest of the

North Village area, transit facilities, and ski lifts, and to provide animated streets with pedestrian amenities. Therefore, the No Project/Reasonably Foreseeable Development Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use and relevant planning.

Aesthetics/Light and Glare

The short-term visual impacts associated with demolition, grading, paving and construction activities that would occur with the proposed project would similarly occur with the No Project/Reasonably Foreseeable Development Alternative, although to a lesser extent. Further, the anticipated time of construction would be slightly reduced, given the reduced square footage proposed.

The project site's long-term visual character would be altered with this Alternative, as the new private residential condominiums would be built on top of the existing parking structure podium (similar to that analyzed as part of the 1999 SPEIR). Impacts to view blockage of the Sherwin Range would be similar to that considered for the proposed project. However, the long-term visual character of the project site and its surroundings would be reduced with the No Project/ Reasonably Foreseeable Development Alternative, as the on-site development would appear similar in form and building height to the adjoining uses (Fireside at the Village condominiums and the existing 8050 Buildings A and B). However, pedestrian features (i.e., pedestrian porte cochere, improved sidewalk, landscaping, public kiosk, and public pocket park) would not be constructed along Minaret Road, which would not be consistent with the intent of the 2007 General Plan, NVSP, and NVSP Design Guidelines. As depicted in Exhibit 5.2-9a, *Proposed Summer Shadow Patterns*, Exhibit 5.2-9b, *Proposed Winter Shadow Patterns*, and Exhibit 5.2-9c, *Proposed Vernal/Autumnal Shadow Patterns*, shade and shadows patterns would be slightly reduced with the No Project/Reasonably Foreseeable Development Alternative, since the proposed building would be three stories lower. As with the proposed project, this Alternative would result in less than significant impacts with the implementation of mitigation measures.

The No Project/Reasonably Foreseeable Development Alternative would be considered environmentally superior to the proposed project regarding aesthetics/light and glare impacts as it would reduce the building heights similar to the surrounding area, be located below the surrounding tree canopy, and would slightly reduce impacts from shadow patterns in the area.

Traffic/Circulation

The proposed project is forecast to generate approximately 19 peak hour trips for a typical weekend. Under the No Project/Reasonably Foreseeable Development Alternative, the project site would be developed with 41,134 square feet of residential condominium units (with fractional ownership), instead of the proposed 64,750 square-foot hotel and accessory uses. During peak travel times such as a typical winter weekend, both the No Project/Reasonably Foreseeable Development Alternative and the proposed project could reach maximum occupancy levels. Given the residential condominiums would result in fewer occupants and less vehicular travel than the proposed project, this Alternative would result in a decrease in ADT, compared to the proposed project. Therefore, this Alternative would result in a decrease in traffic when compared to the proposed project.

Comparatively, the traffic and circulation impacts under the No Project/Reasonably Foreseeable Development Alternative would be less than the proposed project, given this Alternative would have compatible uses but less development intensity as the proposed project. Therefore, the less than significant traffic and circulation impacts that would occur with the proposed project would be further reduced with this Alternative.

The No Project/Reasonably Foreseeable Development Alternative would be environmentally superior to the proposed project regarding traffic and circulation impacts due to decreased traffic volumes.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts would occur with the No Project/Reasonably Foreseeable Development Alternative due to construction of the proposed residential condominiums. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed project, given this Alternative would result in a similar disturbance area. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative.

Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the No Project/Reasonably Foreseeable Development Alternative, although to a lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be less than the proposed project, given this Alternative would decrease the ADT compared to the proposed project. During peak travel times (such as a typical winter weekend), both the No Project/Reasonably Foreseeable Development and the proposed project could reach maximum occupancy levels. As the residential condominiums would result in fewer occupants and less vehicular travel than the proposed project, the mobile source noise impacts that would occur with the proposed project would occur also with this Alternative, although to a lesser degree.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, since the resultant noise would be typical of the surrounding visitor-oriented resort uses. With the No Project/Reasonably Foreseeable Development, 21 residential condominiums would operate on the project site, generating noise levels from new stationary sources, including mechanical equipment, and delivery activities, among others. Comparatively, the stationary source noise impacts under the No Project/Reasonably Foreseeable Development Alternative would be less than the proposed project, given this Alternative would have compatible uses but less development intensity as the proposed project. Therefore, the stationary source noise impacts that would occur with the proposed project would occur also with this Alternative, however, to a lesser degree.

The No Project/Reasonably Foreseeable Development would be environmentally superior to the proposed project regarding noise impacts due to decreased mobile and stationary noise levels.

Air Quality

Table 5.5-5, *Maximum Daily Construction Emissions*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, construction, and paving activities would occur with the No Project/Reasonably Foreseeable Development Alternative. Comparatively, the construction-related air quality impacts would be similar to the proposed project, given ground-disturbing activities would occur within a similar development footprint. Therefore, the short-term air quality impacts that would occur with the proposed project would be similar under this Alternative.

The proposed project would not exceed the MDAQMD's emissions thresholds, as indicated in Table 5.5-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the No Project/Reasonably Foreseeable Development Alternative, although to a lesser degree than the proposed project. During peak travel times (such as a typical winter weekend), both the No Project/Reasonably Foreseeable Development and the proposed project could reach maximum occupancy levels. As a result, this Alternative would result in a decrease in ADT compared to the proposed project, as this Alternative would result in fewer occupants and fewer vehicle trips. With this Alternative, proportionately less long-term air quality impacts from mobile pollutant emissions would occur compared to the proposed project.

The No Project/Reasonably Foreseeable Development Alternative would be environmentally superior to the proposed project regarding air quality impacts due to decreased mobile source emissions.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, *Greenhouse Gas Emissions*, project implementation would result in 738.57 $MTCO_2eq/yr$, which is below the 900 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the No Project/Reasonably Foreseeable Development Alternative, although to a lesser degree than the proposed project. During peak travel times (such as a typical winter weekend), both the No Project/Reasonably Foreseeable Development and the proposed project could reach maximum occupancy levels. As such, this Alternative would result in a decrease in ADT compared to the proposed project, as this Alternative would result in fewer occupants and a reduction in vehicle trips. The combined construction and operational GHG emissions would also result in similar less than significant impacts from a cumulative perspective under this Alternative, although to a lesser degree than the proposed project.

The No Project/Reasonably Foreseeable Development Alternative would be environmentally superior to the proposed project regarding GHG emissions, due to decreased mobile emissions.

Utilities and Service Systems

Implementation of the proposed project would place increased demands upon utilities and service systems (i.e., wastewater and water). The No Project/Reasonably Foreseeable Development Alternative would result in reduced impacts associated with increased demands upon utilities and service systems, as this Alternative would have reduced development intensity at the project site. Therefore, the less than significant increased demands upon utilities and service systems that would occur with the proposed project would occur also with this Alternative.

The No Project/Reasonably Foreseeable Development Alternative would be environmentally superior to the proposed project regarding impacts to utilities and service systems, since less development intensity would occur compared to the proposed project.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/Reasonably Foreseeable Development Alternative would only attain some, but not all, of the project's objectives. This alternative would result in 21 residential condominiums with 33 rooms, but would eliminate the accessory components related to hotel uses including the food and beverage service, spa, outdoor pool/jacuzzis, and pedestrian porte-cochere, public kiosk, and public pocket park. As a result, the No Project/Reasonably Foreseeable Development Alternative would not meet the Town's goals and objectives pertaining to creating a sense of exploration using pedestrian-oriented sidewalks, plazas, and courtyards with pedestrian comforts; a visitor-oriented entertainment retail district; active day and evening through all four seasons, designed to achieve a two to three hour visit; resort and resident activities, amenities, and services; animation with retail and significant businesses oriented to the street; retail and services in "storefront" setting located at the sidewalk; and a variety of resort lodging supported by meeting facilities, outdoor activities, and restaurants, arts, culture, and entertainment.

The goals and objectives of the NVSP would not be fully realized with implementation of the No Project/Reasonably Foreseeable Development Alternative. This Alternative would not provide facilities or integrated pedestrian access to and from the plazas. Implementation of the No Project/ Reasonably Foreseeable Development Alternative would not meet most of the project's basic objectives. This Alternative would not enhance pedestrian integration and amenities. Dining, casual gathering places, publically accessible landscaped spaces, and hotel-type visitor accommodations for the residents and visitors of the Town would not be provided at the project site. The No Project/Reasonably Foreseeable Development Alternative would create Town revenue through fractional ownership taxes and assessments, although would not provide the fullest extent of economic sustainability compared to the proposed project. Therefore, unlike the proposed project, this alternative would only partially achieve the project objectives.

7.2.3 "REDUCED HEIGHT" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Reduced Height Alternative proposes the development of a hotel use (with option for condominium or fractional ownership) on the project site that would have 56 hotel rooms and would be five stories (58 feet) in height. This alternative would have the same building footprint,

architecture, and landscaping elements as the proposed project. However, this alternative would have a loss of amenities including the food and beverage service, spa, outdoor pool/jacuzzis, and pedestrian porte-cochere, as this alternative would not function as a more traditional hotel. The development associated with this alternative would still be built on top of the existing parking structure podium; however, the proposed outdoor pool/jacuzzi area would instead be utilized to accommodate outdoor patios for condominium units and modest landscape features. Under the Reduced Height Alternative, the NVSP would need to be amended to increase the allowable development density for the project site (a transfer of 19 rooms from one of the Mammoth Crossing sites [MC zone]). However, amendments pertaining to building heights and setbacks would not be required.

Table 7-2, *Comparison of Proposed Project and Reduced Height Alternative*, compares the overall density, building height, and average daily trips of the proposed project and Reduced Height Alternative. Comparatively, this Alternative proposes a 16.4 percent decrease in hotel units, with 11 fewer hotel rooms, resulting in a decrease in the allowable development density transfer of 19 rooms from the Mammoth Crossing zone. This Alternative would also decrease three peak hour trips. In addition, the Reduced Height Alternative proposes a maximum height of five stories (58 feet) with an additional 4 feet, 6 inches for roof appurtenances, a decrease of 22 feet from the proposed project. The proposed maximum height would be consistent with the current NVSP. As the proposed maximum height decreases, the proposed building also conforms to the building setback requirements in the Resort General (RG) zone. Under the Reduced Height Alternative, the architecture and landscaping components would be developed similar to the proposed project. However, the remaining accessory components (i.e., food and beverage service, spa, outdoor pool/jacuzzis, pedestrian porte-cochere, public pocket park, and public kiosk) would not be developed.

Table 7-2
Comparison of Proposed Project and Reduced Height Alternative

Land Use	Proposed Project	Reduced Height Alternative	Difference
Hotel[1]	34,840 square feet (67 rooms)	29,120 square feet (56 rooms)	-5,720 square feet (-11 rooms)
Accessory Uses (i.e., circulation)	29,910 square feet	24,135 square feet	-5,775 square feet
Building Height[2]	80 feet	58 feet	-22 feet
Peak Hour Trips[3]	19	16	-3

Notes:
1. The hotel proposes rooms that would be approximately +/- 520 square feet per room.
2. Building height excludes an additional 4 feet and 6 inches for roof appurtenances.
3. Based on a trip generation rate of 0.28 trips per occupied unit per *The Inn at the Village Project – Traffic Analysis,* dated May 8, 2014.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Reduced Height Alternative, a hotel (with option for condominium or fractional ownership) would occur on-site. The NVSP would still need to be amended with the Reduced

Height Alternative, but to a lesser degree than the proposed project. With the Reduced Height Alternative, the NVSP would require an amendment to allow for a density transfer from the nearby Mammoth Crossing zone. Due to the reduced height of the Alternative, the NVSP amendments associated with the project concerning the maximum height and reduced building setbacks would not be required, as this Alternative would be consistent with the current NVSP in this regard.

As the NVSP would still require an amendment for the increased density at this site, this Alternative would also require land use approvals and permits including a District Zoning Amendment, Tentative Tract Map Conditional Use Permit, Design Review Permit, and Final Map, similar to the proposed project.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use and relevant planning, given that it would reduce the number of required amendments to the NVSP, but not meeting the many of the policies and objectives of the General Plan and NVSP, particularly regarding increased pedestrian connectivity along Minaret Road.

Aesthetics/Light and Glare

The short-term visual impacts associated with demolition, grading, paving, and construction activities that would occur with the proposed project would similarly occur with the Reduced Height Alternative, although to a lesser extent. Further, the anticipated time of construction would be slightly reduced, given the reduced square footage proposed.

The project site's long-term visual character would be altered with this Alternative, as the new hotel would be constructed on top of the existing parking structure podium. Impacts to view blockage of the Sherwin Range would be similar to that considered for the proposed project. However, the long-term visual character of the project site and its surroundings would be reduced with the Reduced Height Alternative, as the on-site development would appear similar in building height to the adjoining uses (Fireside at the Village condominiums and the existing 8050 Buildings A and B). However, pedestrian amenities (i.e., pedestrian porte cochere, public kiosk, and public pocket park) and an active street frontage associated with the food and beverage service terraces would not be achieved along Minaret Road, which would not be consistent with the intent of the 2007 General Plan, NVSP, and NVSP Design Guidelines. The shade and shadows patterns of the Reduced Height Alternative would be slightly reduced, compared to the proposed project, and similar to that considered in the 1999 SPEIR, as the proposed building heights would be allowed under the NVSP. Similar to the proposed project, this Alternative would result in less than significant impacts with the implementation of mitigation measures.

The Reduced Height Alternative would be environmentally superior to the proposed project regarding aesthetics/light and glare, given that it would result in reduced building heights more consistent with the adjoining development, situated below the surrounding tree canopy, and reduced shadow patterns in the area compared to the proposed project. However, it should be noted that the lack of pedestrian features and an active street front along Minaret Road would not be consistent with the intent of the 2007 General Plan, NVSP, and NVSP Design Guidelines.

Traffic/Circulation

Under the Reduced Height Alternative, a 56-room hotel (with an option for condominium or fractional ownership) would be developed in place of the project's proposed 67-room hotel. Table 7-2, presents the forecast daily traffic volumes for the Reduced Height Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 16 peak hour trips. Therefore, this Alternative would have three fewer peak hour trips than the proposed project.

In addition, the Reduced Height Alternative is forecast to generate approximately 16 percent fewer peak hour trips (or three fewer peak hour trips), when compared to the proposed project. Comparatively, the traffic and circulation impacts under the Reduced Height Alternative would be slightly less than the proposed project, given this Alternative would decrease the ADT by 3 fewer peak hour trips. Therefore, the less-than-significant traffic and circulation impacts would be similar to that considered for the proposed project.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding traffic and circulation impacts due to the nominal reduction in traffic volumes.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from demolition, grading, and construction activities would occur with the Reduced Height Alternative due to construction of the proposed buildings and improvements. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed project, given this Alternative would result in a similar development footprint. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative.

Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Reduced Height Alternative, although to a slightly lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be nominally less than the proposed project, given this Alternative would decrease ADT by approximately 16 percent (three fewer peak hour trips). Therefore, the overall mobile source noise impacts that would occur with the proposed project would occur also with this Alternative.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, since the resultant noise would be typical of the surrounding visitor-oriented resort uses. With the Reduced Height Alternative, a new 56-room hotel (with option for condominium or fractional ownership) would operate on the project site, generating noise levels from new stationary sources, including parking lots, mechanical equipment, and loading/unloading areas, among others. Comparatively, the stationary source noise impacts under the Reduced Height Alternative would be nominally less than the proposed project, given this

Alternative would have less rooms and less vehicle trips (three fewer peak hour trips) than the proposed project. Therefore, the overall stationary source noise impacts that would occur with the proposed project would occur also with this Alternative.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding noise impacts due to the nominal decreased mobile and stationary noise levels.

Air Quality

Table 5.5-5, *Maximum Daily Construction Emissions*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, construction, and paving activities would also occur with the Reduced Height Alternative. Comparatively, the construction-related air quality impacts would be nominally less than the proposed project, given ground-disturbing activities would occur within a similar development footprint. Therefore, the short-term air quality impacts that would occur with the proposed project would be similar under this Alternative.

The proposed project would not exceed the MDAQMD's emissions thresholds, as indicated in Table 5.5-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the Reduced Height Alternative, although to a slightly lesser degree than the proposed project. This Alternative would result in fewer rooms and fewer vehicle trips (three fewer peak hour trips), as compared to the proposed project. With this Alternative, proportionately less long-term air quality impacts from mobile pollutant emissions would occur (approximately 16 percent less, which would be a nominal reduction since only three fewer vehicles would occur), as compared to the proposed project.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding air quality impacts due to the nominal decreased mobile source emissions.

Greenhouse Gas Emissions

As indicated in Table 5.6-1, *Greenhouse Gas Emissions*, project implementation would result in 738.57 $MTCO_2eq/yr$, which is below the 900 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the Reduced Height Alternative, although to a slightly lesser degree (a nominal decrease of three peak hour trips), than the proposed project. As with the proposed project, the combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective under this Alternative, although only a nominal reduction compared to the proposed project.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding GHG emissions, due to the nominal decreased mobile emissions.

Utilities and Service Systems

Implementation of the proposed project would place increased demands upon utilities and service systems (i.e., wastewater and water). The Reduced Height Alternative would result in similar impacts associated with increased demands upon utilities and service systems, because a new hotel would be developed. Therefore, the less than significant increased demands upon utilities and service systems that would occur with the proposed project would occur also with this Alternative.

The Reduced Height Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts to utilities and service systems, given that it would be a similar use and it would have similar impacts as the proposed project.

ABILITY TO MEET PROJECT OBJECTIVES

By reducing the height, this Alternative would result in 56 rooms but eliminate the accessory components including the food and beverage service, spa, outdoor pool/jacuzzis, and pedestrian porte-cochere. implementation of this Alternative would not attain most of the Town's goals and objectives, including those pertaining to creating a sense of exploration using pedestrian-oriented sidewalks, plazas, and courtyards with pedestrian comforts; a visitor-oriented entertainment retail district; active day and evening through all four seasons, designed to achieve a two to three hour visit; resort and resident activities, amenities, and services; animation with retail and significant businesses oriented to the street; retail and services in "storefront" setting located at the sidewalk; and a variety of resort lodging supported by meeting facilities, outdoor activities, and restaurants, arts, culture, and entertainment.

The goals and objectives of the NVSP would not be fully realized with implementation of the Reduced Height Alternative. This Alternative would not provide desired facilities.

Last, implementation of the Reduced Height Alternative would only meet some, but not all of the project's objectives. The Reduced Height Alternative would not attain enhanced pedestrian integration and amenities. Dining, casual gathering places, and publically accessible landscaped spaces would not be provided on the project site. The Reduced Height Alternative would create Town revenue through transient occupancy tax, although not to the extent of the proposed project. Therefore, unlike the proposed project, this Alternative would not fully act as a catalyst for the revitalization and added vibrancy of the NVSP area.

7.3 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

Table 7-3, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-3 and the analysis presented above indicates the No Project/No Development and No Project/Reasonably Foreseeable Development Alternative are the environmentally superior alternatives, as these alternatives would avoid or lessen impacts associated with development of the proposed project. According to CEQA Guidelines Section 15126.6(e), *"No Project" Alternative*, "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Accordingly, the No Project/Reasonably Foreseeable Alternative is

the environmentally superior alternative. However, this alternative would not achieve most of the project objectives.

Table 7-3
Comparison of Alternatives

Sections	No Project/ No Development	No Project/ Reasonably Foreseeable Development	Reduced Height
Land Use and Relevant Planning	=	=	=
Aesthetics/Light and Glare	↓	↓	↓
Traffic/Circulation	↓	↓	=
Noise	↓	↓	=
Air Quality	↓	↓	=
Greenhouse Gas Emissions	↓	↓	=
Utilities and Service Systems	↓	↓	=

↑ Indicates an impact that is greater than the proposed Project (environmentally inferior).
↓ Indicates an impact that is less than the proposed Project (environmentally superior).
= Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior).
* Indicates a significant and unavoidable impact.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As discussed throughout Section 5.0, *Environmental Analysis*, the proposed project would not result in any significant and unavoidable impacts, as all potential impacts were concluded to be less than significant or reduced to a less than significant levels with implementation of the Town's standards and regulations, the applicable 1999 SPEIR Mitigation Measures, and/or the recommended Additional Mitigation Measures. Thus, although the No Project/Reasonably Foreseeable Development Alternative would reduce environmental impacts, which would be considered environmental superior to the proposed project, this Alternative would not reduce any significant and unavoidable environmental impacts.

Further, the No Project/Reasonably Foreseeable Development Alternative would result in the elimination of the accessory components including the food and beverage service, spa, outdoor pool/jacuzzis, lobby, pedestrian porte-cochere, public kiosk, and public pocket park. This Alternative would not attain most of the Town's goals and objectives, including those pertaining to creating a sense of exploration using pedestrian-oriented sidewalks, plazas, and courtyards with pedestrian comforts; a visitor-oriented entertainment retail district; active day and evening through all four seasons, designed to achieve a two to three hour visit; resort and resident activities, amenities, and services; animation with retail and significant businesses oriented to the street; retail and services in "storefront" setting located at the sidewalk; and a variety of resort lodging supported by meeting facilities, outdoor activities, and restaurants, arts, culture, and entertainment. The goals and objectives of the NVSP would not be fully realized with this Alternative, as it would not provide facilities or integrated pedestrian access to and from the plazas. Further, only some of the project's objectives would be met. Dining, casual gathering places, publically accessible landscaped spaces, and hotel-type visitor accommodations for the residents and visitors of the Town would not be

provided on the project site. Therefore, unlike the proposed project, the No Project/Reasonably Foreseeable Development Alternative would not fully act as a catalyst for the revitalization, economic sustainability, and added vibrancy of the NVSP area.

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8.0 Effects Found Not To Be Significant

8.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

California Public Resources Code Section 21003 (f) states: "…it is the policy of the state that…[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."

This policy is reflected in CEQA Guidelines, section 15162(a), which states that once an EIR has been prepared for a project, a lead agency shall not prepare a further EIR unless substantial changes are proposed to the project and those changes lead to new significant impacts or a substantial increase in impacts; or, substantial changes in circumstances occur such that the project would have new significant impacts or a substantial increase in impacts; or, new information of substantial importance shows that the project would have one or more significant effects not discussed in the previous EIR.

The Town used a Modified Initial Study to document whether any of the circumstances under Public Resources Code, section 21166 and State CEQA Guidelines, section 15162 were triggered by the project.

As described in the Notice of Preparation (NOP) prepared for the proposed project, seven impact categories were found to have at least one potentially significant impact resulting from new information of the type that triggers additional environmental review pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162; therefore, these seven categories (Aesthetics, Air Quality, Greenhouse Gas Emissions, Land Use and Relevant Planning, Traffic/Circulation, Noise, and Utilities and Service Systems) have been evaluated in this SEIR.

8.1 ASSESSMENT IN THE MODIFIED INITIAL STUDY

The Modified Initial Study prepared for the project in March 2014 determined that the impacts listed below were fully evaluated and addressed in the previous environmental documentation. As a result, these impacts do not trigger circumstances under Public Resources Code Section 21166 and State CEQA Guidelines Section 15162 and no further environmental review is required for these areas. Please refer to Appendix 11.1, *Modified Initial Study and Notice of Preparation*, for an explanation of the basis of these conclusions. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist, as contained in the Modified Initial Study.

Table 8-1
Impacts Found Not To Be Significant

Environmental Issues		Initial Study Determination
4.2	**Agriculture and Forest Resources.** *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*	
4.2.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?	No New Impact/No Impact.
4.2.b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No New Impact/No Impact.
4.2.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))?	No New Impact/No Impact.
4.2.d.	Result in the loss of forest land or conversion of forest land to non-forest use?	No New Impact/No Impact.
4.2.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?	No New Impact/No Impact.
4.3	**Air Quality.** *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*	
4.3.e.	Create objectionable odors affecting a substantial number of people?	No New Impact/No Impact.
4.4	**Biological Resources.** Would the project:	
4.4.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?	No New Impact/No Impact.
4.4.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?	No New Impact/No Impact.
4.4.c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No New Impact/No Impact.
4.4.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?	No New Impact/No Impact.
4.4.e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No New Impact/No Impact.

Table 8-1 [continued]
Impacts Found Not To Be Significant

Environmental Issues		Initial Study Determination
4.4.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?	No New Impact/No Impact.
4.5	**Cultural Resources.** *Would the project:*	
4.5. a.	Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?	No New Impact/No Impact.
4.5. b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	No New Impact/No Impact.
4.5. c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No New Impact/No Impact.
4.5. d.	Disturb any human remains, including those interred outside of formal cemeteries?	No New Impact/No Impact.
4.6	**Geology and Soils.** *Would the project:*	
4.6.a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	
	1) 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.	No New Impact/No Impact.
	2) Strong seismic ground shaking?	No New Impact/No Impact.
	3) Seismic-related ground failure, including liquefaction?	No New Impact/No Impact.
	4) Landslides?	No New Impact/No Impact.
4.6.b.	Result in substantial soil erosion or the loss of topsoil?	No New Impact/No Impact.
4.6.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?	No New Impact/No Impact.
4.6.d.	Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?	No New Impact/No Impact.
4.6.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 New Impact/No Impact.
4.8	**Hazards and Hazardous Materials.** *Would the project:*	
4.8.a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No New Impact/No Impact.
4.8.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?	No New Impact/No Impact.
4.8.c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No New Impact/No Impact.
4.8.d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No New Impact/No Impact.

Table 8-1 [continued]
Impacts Found Not To Be Significant

Environmental Issues		Initial Study Determination
4.8.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No New Impact/No Impact.
4.8.f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No New Impact/No Impact.
4.8.g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No New Impact/No Impact.
4.8.h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No New Impact/No Impact.
4.9	**Hydrology and Water Quality.** *Would the project:*	
4.9.a.	During project construction, substantially impair the water quality of receiving waters? In considering water quality, factors such as water temperature, dissolved oxygen levels, and turbidity should be considered.	No New Impact/No Impact.
4.9.b.	Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	No New Impact/No Impact.
4.9.c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	No New Impact/No Impact.
4.9.d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site?	No New Impact/No Impact.
4.9.e.	Create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	No New Impact/No Impact.
4.9.f.	Otherwise substantially degrade water quality?	No New Impact/No Impact.
4.9.g.	Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No New Impact/No Impact.
4.9.h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	No New Impact/No Impact.
4.9.i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No New Impact/No Impact.
4.9.j.	Inundation by seiche, tsunami, or mudflow?	No New Impact/No Impact.
4.10	**Land Use and Planning.** *Would the project:*	
4.10.a.	Physically divide an established community?	No New Impact/No Impact.
4.10.c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	No New Impact/No Impact.

Table 8-1 [continued]
Impacts Found Not To Be Significant

Environmental Issues		Initial Study Determination
4.11	**Mineral Resources.** *Would the project:*	
4.11.a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No New Impact/No Impact.
4.11.b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No New Impact/No Impact.
4.12	**Noise.** *Would the project:*	
4.12.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No New Impact/No Impact.
4.12.f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No New Impact/No Impact.
4.13	**Population and Housing.** *Would the project:*	
4.13.a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No New Impact/No Impact.
4.13.b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	No New Impact/No Impact.
4.13.c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No New Impact/No Impact.
4.14	**Public Services.** *Would the project:*	
4.14.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:	
	1) Fire protection?	No New Impact/No Impact.
	2) Police protection?	No New Impact/No Impact.
	3) Schools?	No New Impact/No Impact.*
	4) Parks?	No New Impact/No Impact.
	5) Other public facilities?	No New Impact/No Impact.
4.15	**Recreation.** *Would the project:*	
4.15.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?	No New Impact/No Impact.
4.15.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?	No New Impact/No Impact.
4.16	**Transportation/Traffic.** *Would the project:*	
4.16.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?	No New Impact/No Impact.

Table 8-1 [continued]
Impacts Found Not To Be Significant

Environmental Issues		Initial Study Determination
4.16.c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No New Impact/No Impact.
4.16.d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No New Impact/No Impact.
4.16.e.	Result in inadequate emergency access?	No New Impact/No Impact.
4.16.f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	No New Impact/No Impact.
4.17	**Utilities and Service Systems.** *Would the project:*	
4.17.c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No New Impact/No Impact.
4.17.f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	No New Impact/No Impact.
4.17.g.	Comply with federal, state, and local statutes and regulations related to solid waste?	No New Impact/No Impact.

* - The past environmental documentation concluded that the project would have significant and unavoidable impacts in this regard. However, the Modified Initial Study analyzed the proposed project and concluded that the project would have no new impacts or reduced impacts. Therefore, the topic is not further analyzed in this SEIR. The lead agency will include findings of fact in the certifying resolution reflecting this conclusion.

9.0 Organizations and Persons Consulted

9.0 ORGANIZATIONS AND PERSONS CONSULTED

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10.0 Bibliography

10.0 BIBLIOGRAPHY

The following references were utilized during preparation of this Subsequent Environmental Impact Report.

1. Bull Stockwell Allen, *Conditional Use Permit Submittal*, Sheet 3-10, Site Strategy, February 28, 2014.

2. Bull Stockwell Allen, *Conditional Use Permit Submittal*, Sheet 3-11, East Elevation, February 28, 2014.

3. Bull Stockwell Allen, *Conditional Use Permit Submittal*, Sheet 18-4, Minaret Road Setback Analysis, February 18, 2014.

4. Business and Professions Code Section 11010 and Government Code Section 66473.4.

5. California Air Pollution Control Officers Association, C*EQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

6. California Air Pollution Officers Association, *California Emissions Estimator Model*, 2013. http://www.caleemod.com.

7. California Air Resources Board, *Aerometric Data Analysis and Measurement System* (*ADAM) Air Quality Data Statistics*, http://www.arb.ca.gov/adam/welcome.html, accessed on May 12, 2014.

8. California Air Resources Board, *Climate Change Proposed Scoping Plan – A Framework for Change*, October 2008.

9. California Air Resources Board and United States Environmental Protection Agency, *Ambient Air Quality Standards,* June 4, 2013.

10. California Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, http://minerals.usgs.gov/minerals/pubs/state/980601mp.pdf, accessed April 2014.

11. California Department of Transportation, Division of Environmental Analysis, *Traffic Noise Analysis Protocol Technical Noise Supplement,* November 2009.

12. California Employment Development Department, L*abor Force and Unemployment Rate for Cities and Designated Places*, March 2014.

13. Cal Recycle Website, *Facility/Site Summary Details: Benton Crossing Landfill*, http://www.calrecycle.ca.gov/SWFacilities/Directory/26-AA-0004/Detail/, accessed March 4, 2014.

14. California Department of Conservation, *Farmland Mapping and Monitoring Program, California Important Farmland Finder*, http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx, accessed on February 14, 2014.

15. California Employment Development Department, La*bor Force and Unemployment Rate for Cities and Designated Places*, March 2014.

16. California Environmental Quality Act, 1970, as amended, Public Resources Code Sections 21000-21178, http://ceres.ca.gov/ceqa/.

17. California State Office of Planning and Research, *Noise Element Guidelines*, October 2003, http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf.

18. Cyril M. Harris, *Handbook of Noise Control*, 1979.

19. Cyril M. Harris, *Noise Control in Buildings*, 1994.

20. Department of Toxic Substances Control, http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp, accessed on February 26, 2014.

21. Eastern Sierra Transit Website, http://www.estransit.com/CMS/, accessed April 2014.

22. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* (EPA/ONAC 550/9-74-004), March 1974.

23. Federal Emergency Management Agency, *Flood Insurance Rate Map*, Panel 1388 of 2050, Map Number 06051C1388D, effective date February 18, 2011.

24. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Guidelines*, May 2006, http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration Manual.pdf.

25. Great Basin Unified Air Quality Management District, *2010-2011 Mammoth PM10 and Meteorological Summary*, dated April 28, 2011.

26. Great Basin Unified Air Quality Management District, *2011-2012 Mammoth PM10 and Meteorological Summary*, dated April 19, 2012.

27. Great Basin Unified Air Quality Management District, *2012-2013 Mammoth PM10 and Meteorological Summary*, dated May 17, 2013.

28. Great Basin Unified Air Quality Management District, *Air Quality Maintenance Plan and PM-10 Redesignation Request for the Town of Mammoth Lakes*, adopted by the Town on November 6, 2013.

29. Google Earth Maps, http://maps.google.com, accessed February and April 2014.

30. Governor's Office of Planning and Research, *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review,* June 19, 2008.

31. High Sierra Energy Foundation, http://highsierraenergy.org/, accessed April 2014.

32. Intergovernmental Panel on Climate Change, *Climate Change, The Science of Climate Change – Contribution of Working Group I to the Second Assessment Report of the IPCC*, 1996.

33. LSA Associates, Inc., *50 Canyon Boulevard (Inn at the Village): Valet Operation*, dated October 23, 2013.

34. LSA Associates, Inc., *The Inn at the Village Project – Traffic Analysis*, May 8, 2014.

35. LSC Transportation Consultants, Inc., *Inn at the Village Traffic Analysis – Peer Review,* March 18, 2014.

36. LSC Transportation Consultants, Inc., *Town of Mammoth Lakes Travel Model, Final Report*, dated February 15, 2011.

37. Mammoth Community Water District Website, http://www.mcwd.dst.ca.us/, accessed March 3, 2014.

38. Mammoth Community Water District, *2010 Urban Water Management Plan*, November 2011.

39. Mammoth Community Water District, *Revised Level 1 Water Restrictions.*

40. Mammoth Community Water District, *Groundwater Management Plan For The Mammoth Basin Watershed,* July 2005.

41. Mammoth Lakes Fire Protection District Website, http://mammothlakesfd.homestead.com/Operations.html, accessed February 28, 2014.

42. Mammoth Lakes Police Department Website, http://www.j.mammothlakespd.org/, accessed February 28, 2014.

43. Melville C. Branch and R. Dale Beland, *Outdoor Noise in the Metropolitan Environment,* 1970.

44. M.J. Hayne, et al, *Prediction of Crowd Noise*, Acoustics, November 2006.

45. Mojave Desert Air Quality Management District, *CEQA and Federal Conformity Guidelines,* February 2009.

46. Mono County Website, http://www.monocounty.ca.gov/information.html, accessed April 30, 2014.

47. Office of Planning and Research, California, *General Plan Guidelines*, October 2003.

48. Officially Designated State Scenic Highways and Historic Parkways Map, http://www.dot.ca.gov/hq/LandArch/scenic_highways/, accessed February 14, 2014.

49. PCR Services Corporation, *Town of Mammoth Lakes Trail System Master Plan Environmental Impact Report*, July 2011.

50. South Coast Air Quality Management District, Board Meeting Agenda No. 31, http://www.aqmd.gov/hb/2008/ December/081231a.htm, accessed April 2014.

51. State of California Department of Conservation California Geological Survey, *Alquist-Priolo Home Page*, http://www.quake.ca.gov/gmaps/ap/ap_maps.htm, accessed February 25, 2014.

52. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*. Sacramento, California, May 2013.

53. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/ reports/ estimates/e-8/, accessed April 30, 2014.

54. State of California Department of Transportation, *California Scenic Highway Mapping System*, http://www.dot. ca.gov/hq/LandArch/scenic_ highways/, accessed on May 15, 2014.

55. State of California Regional Water Quality Control Board Lahontan Region, *Water Quality Control Plan for the Lahontan Region North and South Basins,* Plan effective March 21, 1995, amendments effective August 1995 through December 2005.

56. Telephone conversation with Jan Sudomier from the Great Basin Unified Air Pollution Control District, April 16, 2014.

57. Town of Mammoth Lakes, *Design Guidelines The Village at Mammoth*, approved August 23, 2000.

58. Town of Mammoth Lakes, *Final Administrative Draft Mobility Plan,* May 15, 2012.

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

60. Town of Mammoth Lakes, *Final Environmental Impact Report Mammoth Crossing Project*, April 17, 2009.

61. Town of Mammoth Lakes, *Final Environmental Impact Report North Village Specific Plan*, February 1991.

62. Town of Mammoth Lakes, *Interim Affordable Housing Mitigation Policy Resolution No. 09-76,* November 18, 2009.

63. Town of Mammoth Lakes, *North Village District Planning Study*, modified November 5, 2008, adopted by Town Council June 2009.

64. Town of Mammoth Lakes, *North Village Specific Plan*, amended through October 7, 2009, adopted December 2000.

65. Town of Mammoth Lakes, *North Village Specific Plan Environmental Impact Report Addendum*, May 1994.

66. Town of Mammoth Lakes, *Subsequent Program Environmental Impact Report for the North Village 1999 Specific Plan Amendment*, October 13, 2000.

67. Town of Mammoth Lakes, *Town of Mammoth Lakes General Plan*, dated August 15, 2007, amended February 1, 2012 and June 18, 2014.

68. Town of Mammoth Lakes, *Town of Mammoth Lakes Municipal Code*, codified through Ordinance No. 14-02, passed March 19, 2014.

69. Triad/Holmes Assoc., *Grading and Drainage Plan,* May 13, 2014.

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

71. United States Environmental Protection Agency, *Class I Ozone Depleting Substances*, dated June 21, 2013, http://www.epa.gov/ozone/science/ods/classone.html, accessed on May 15, 2014.

72. United States Environmental Protection Agency, *Greenhouse Gas Equivalencies Calculator,* http://www.epa.gov/cleanenergy/energy-resources/calculator.html, accessed April 2014.

73. United States Environmental Protection Agency, *Inventory of United States Greenhouse Gas Emissions and Sinks 1990 to 2012*, April 2014.

74. United States Environmental Protection Agency, *Overview of Greenhouse Gas Emissions – Emissions of Fluorinated Gases,* dated April 17, 2014. http://epa.gov/climatechange/ ghgemissions/gases/fgases.html, accessed on May 15, 2014.

75. United States Environmental Protection Agency, *Protection of Stratospheric Ozone: Listing of Global Warming Potential for Ozone Depleting Substances*, dated October 29, 2009. http://www.epa.gov/EPAAIR/1996/ January/Day-19/pr-372.html, accessed on May 15, 2014.

76. Water Code Sections 10910-10915.

77. Written Correspondence from Benjamin Harth, Bull Stockwell Allen, May 20, 2014.

78. Written Correspondence from Irene Yamashita, Public Affairs/Environmental Specialist, Mammoth Community Water District, May 14, 2014.

79. Written Correspondence from, Karl Schnadt, Operations Superintendent, Mammoth Community Water District, May 15, 2014.

80. Written Correspondence from Thom Heller, Fire Marshal/Division Chief, Mammoth Lakes Fire Protection District, April 21, 2014 and May 7, 2014.