
4.9 POPULATION, HOUSING, AND EMPLOYMENT

This section outlines the existing population, housing, and employment trends in the Town and assesses impacts to these trends from implementation of the Updated Plan. Information in this section is based on the Updated Plan, the EIR and Subsequent EIR for the North Village Specific Plan Amendment (1999), the Community Facility Needs Assessment (2001), the State of California Employment Development Department (Labor Market Division 2002), the California Department of Finance (Demographic Research Unit 2002), and the 2000 United States Census Data and the adopted Housing Element. Given that various sources are used for data, the numbers do not always match.

The existing Housing Element was updated and certified by the California Department of Housing and Community Development on December 29th 2003. State law requires periodic updating of housing elements. The Town's current and certified Housing Element is not being amended as part of this Updated Plan but will be a part of subsequent General Plan updates.

4.9.1 EXISTING CONDITIONS

Population

Based on the 2000 Census, the resident population of the Town was 7,094, which represents over half of the 12,853 residents in Mono County. The Town has experienced a resident population increase of approximately 80 percent over the past twenty years and over 48 percent in the past ten years (Table 4.9-1 on page 4-221). This population increase far exceeds the State of California as a whole, which experienced a population increase of 13.8 percent in the past ten years.

The permanent population on January 1, 2003 was 7,460 as determined by the California Department of Finance. This increase of 367 residents between 2000 and 2003 represents a five percent increase in three years. The 2004 resident population estimates include 7,569 permanent and 2,264 seasonal residents with an average peak period population of approximately 34,265 (Table 4.9-2 on page 4-221).

Table 4.9-1**Resident Population in Mammoth Lakes between 1980 and 2000**

Year	Population
1980	3,929
1990	4,785
2000	7,094

Source: U.S. Census

Table 4.9-2**Existing Population (2004)**

Units / Population	Permanent Resident	Seasonal	Second Home	Visitor	Total
Units	3,115	566	1,942	4,166	9,871
Population	7,569	2,264	7,768	16,664	34,265 ^a

^a *Population assumes seasonal, visitor, lodging and second home equal four people per dwelling. Permanent resident equal 2.4 per dwelling. 38.5 percent of residential units are permanent, seven percent are seasonal, 24 percent are second home, and 29.5 percent are visitor. This does not equal 100 percent due to vacancies.*

Source: Town of Mammoth Lakes, 2005

Average Peak Population

Population intensity is more than just permanent residents. It includes transient residents and visitors. Therefore, the General Plan uses the phrase “people at one time” (PAOT) to describe population intensity. The average peak population of 34,265 is the total number of PAOT, which represents the average winter Saturday. For the purposes of projecting PAOT, the Town applied a person/unit occupancy, based upon the census average of 2.4 people per household, for all units occupied by permanent residents and a person/unit occupancy of 4.0 was applied to all remaining visitor, second home, and seasonal resident units. This figure was verified by the Town of Mammoth Lakes annual visitor survey and is similar to the unit occupancy factor of 4.1 which was used during the 1987 General Plan.

This figure was verified through the following analysis. As indicated in Table 4.9-3 on page 4-222 permanent population in 2003 was 7,460 as determined by the California Department of Finance. The skier number used was 18,476 (the highest day for the month was 21,630). An estimated 600 skiers from the 93546 zip code reduce this number (MMSA, Thom Heller, oral communication). It was assumed that ¼ of the visitors were not skiing (either non-skiers or just not skiing on that day). This is somewhat lower than our peer resorts and is comparable to the ratio that was used in the 1987 population projections. It was also estimated that the town has

Table 4.9-3**Verification Analysis of PAOT as of January 1, 2004**

Skiers on MMSA	18,476
Permanent population	7,460
Locals skiing	-600
Non-skiing visitors/second homeowners	5,958
Seasonal residents	<u>2,000</u>
Total	33,294

Source: Town of Mammoth Lakes, 2005

approximately 2,000 seasonal residents. The sum of these numbers is 33,294 PAOT, which is varied from the projection by approximately 3 percent.

To facilitate the development of policies for the current General Plan update, a comprehensive review has been made of population and housing trends in Mammoth Lakes over the past 20 years, including issues that may impact population and housing in the years ahead. Estimates of future population are based on an analysis of the number of units that could be constructed by the project.

Based on the proposed 2005 General Plan, the Town of Mammoth Lakes forecasts the PAOT at build out could reach approximately 60,700 by 2024, an increase of approximately 26,400 from the current PAOT. Figure 4.9-1 on page 4-223 shows the population density by area within the UGB. It should be noted that this forecast was based upon the land use designations, goals policies and objectives of the 2005 General Plan when the forecast was established in July 2005.

Demographics

According to the 2000 Census, the majority of the population (over 63 percent) was between the ages of 20 and 54. The segment of the population between the ages of 35 to 44 made up the largest portion (19.6 percent). Based on the 2000 Census, the ethnic makeup of the Town was over 73.5 percent White and 22.2 percent Hispanic (of any race).

Housing

As shown in Table 4.9-4 on page 4-224, as of January 2004, there were approximately 9,871 units located in the Town, 824 of the units currently developed are multi-unit non-transient,³⁶ 2,087 are single-family residential units; and 6,821 are multi-unit

³⁶ *This category includes all attached dwelling units including deed restricted and market rate apartments and multi-family condominiums which prohibit transient rentals. This includes all multi-unit developments located within the Residential Multi-Family 1 zone and Affordable Housing zone and any other multi-unit development in town that prohibits transient rental.*

TOWN OF MAMMOTH LAKES UNIT DENSITY DISTRIBUTION

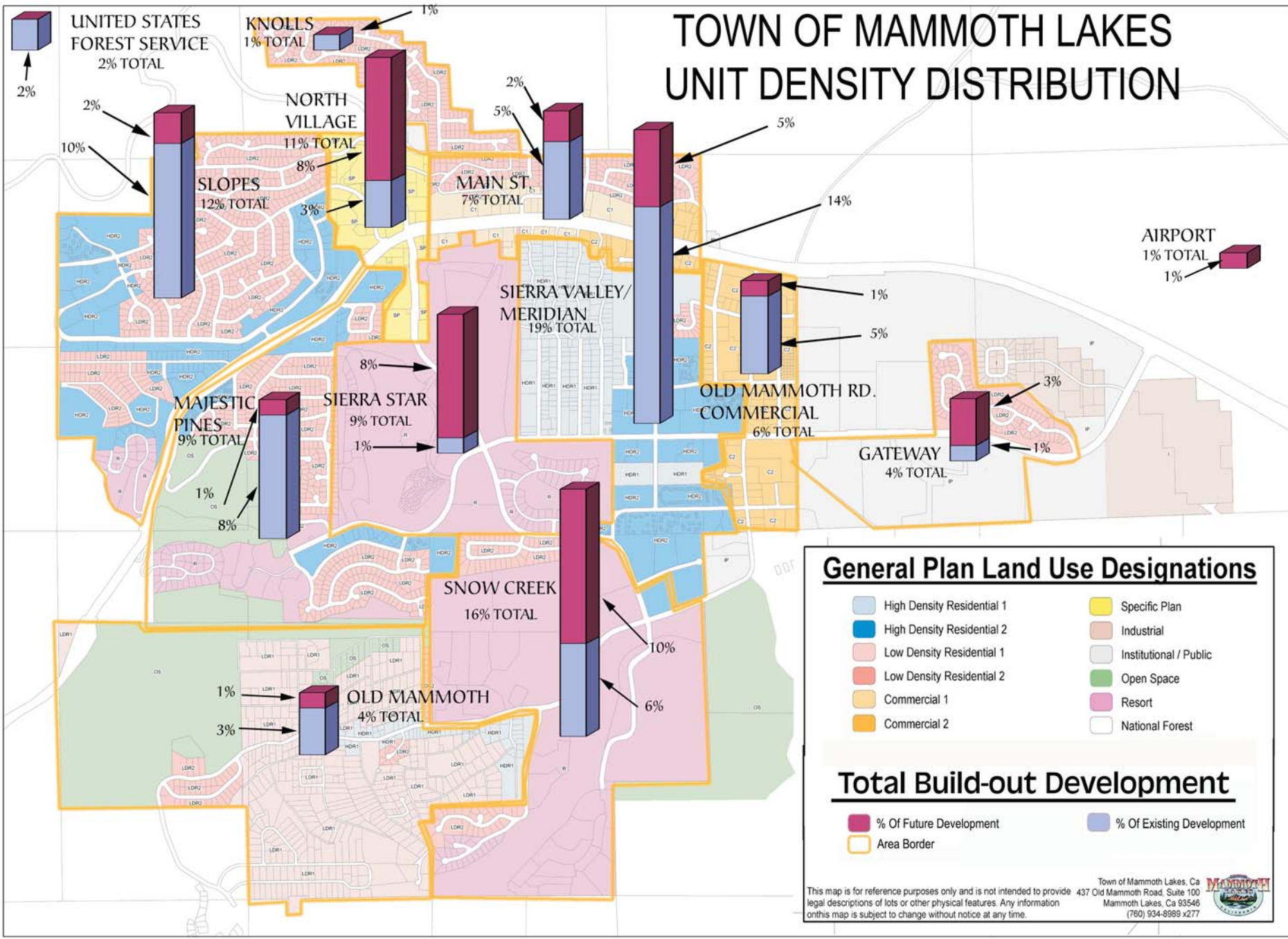


Figure 4.9-1 Population Density by Area within the UGB

Table 4.9-4

Incremental Development for Buildout of the Updated General Plan

Land Use	January 2004 Existing Development Units (Sq. Feet)/Acre	Potential Units at Build-out Updated General Plan Units(Sq. Feet)/Acre
Single Family Non-transient	2,087 units / 409 acres	2,380 units / 576 acres
Single Family Transient	0	97 units / 24 acres
Mobile Home	136 units / 15 acres	144 units / 16 acres
Multi-Unit Non-Transient	827 units / 60 acres	2,091 units / 119 acres
Multi-Unit Transient	6,821 units / 402 acres	11,998 units / 559 acres
Industrial	296,941 sq. ft. / 36 acres	493,547 sq. ft. / 64 acres
Commercial/Office Uses	1,262,618 sq. ft./ 58 acres	1,365,002sq. ft. / 84.5 acres
Total Units	9,871	16,710
Population (persons)	34,265	60,727

*Notes: Population assumptions Seasonal, visitor, lodging & second home = 4 people per dwelling. Permanent resident = 2.4 per dwelling .
38.5% of residential units are permanent, 7% are seasonal, 24% are second home, 29.5% are visitor.
Does not equal 100% due to vacancy
Based population calculated utilizing the same assumptions as, except 4 people per unit is assumed for student housing and % of workforce housing.
Includes bonus units for all development projects that provide AH, state mandated density bonus units, doubling of density provision in existing code and student housing.*

Source: Town of Mammoth Lakes, 2005

transient units.³⁷ The existing General Plan allows for a total of 2,477 single-family residential units, 2,091 multi-unit non-transient units, 144 mobile homes and 11,998 multi-unit transient units for a total of 16,710 residential units.

The housing stock grew 12 percent between the years of 1990 and 2000. The total housing stock in Summer 1990 was estimated at 7,102 units. Of the Town's 1990 housing stock, the vast majority (67 percent or 4,785) consisted of multi-family units. The Town's housing stock grew eleven percent between the years 1990 and 2000, with an average annual increase of approximately one percent over the decade and a peak increase of 3.3 percent between the years 1990 and 1991. The United States Census identified 7,960 housing units as of January 1st, 2000. The housing type which experienced the greatest increase between 1990 and 2000 was the multi-family category with 56 percent of the housing growth (407 units). During the same period, the proportion of renter-occupied units decreased from 57 percent in 1990 to 47 percent in 2000 and the proportion of vacant units decreased from 73 percent to 65 percent.

³⁷ *This category includes all attached dwelling units within the Resort, Specific Plan, Commercial General, Commercial Lodging and Residential Multi-family 2 zones which are either intended for transient occupancy or can be rented out on a nightly basis. These include all hotel, motel, fractional and resort condominium lodging as well as condominium units which are privately owned and can be rented out on a nightly basis.*

Vacancy Rates

Due to the large supply of visitor dwelling units available in the Town, recorded vacancy rates are high. The 2000 Census identified approximately 5,146, or over 64 percent, of the 7,960 housing units as vacant and 2,814 units as occupied. Owner-occupied units made up 52.8 percent of the total with the remaining units (47.2 percent) renter-occupied. Homeowner vacancy was 2.4 percent and rental vacancy was 25.1 percent. By comparison, the census showed that the entire state of California had a vacancy rate of 5.8 percent. According to the California Department of Finance, Demographic Research Unit, there were 8,312 housing units in the Town as of January 2002 and of these, 64.65 percent were vacant. Vacancy rates are high in the Town because a majority of the units are short-term rentals. This is a reflection of the resort nature of the Town, and the fact that seasonal, recreation, or occasional use units account for 57.5 percent (4,579) of the total housing units.

Overcrowding and Affordability

The 2000 Census showed that the number of persons per household in the Town was 2.39 for owner-occupied units and 2.51 for renter-occupied units. The most often used indicator of overcrowding relates to the number of rooms (not bedrooms) and persons in a housing unit. The overcrowding indicator cited by the CEQA Guidelines is the number of households living with 1.01 or more persons per room. Some overcrowding has occurred in Mammoth Lakes as a result of high rents and mortgages, and entry level wages for seasonal workers employed in the ski industry. According to the 2000 Census, 201 households (10.7 percent of occupied units) were overcrowded or severely overcrowded. Despite the available supply of housing units which exist in the Town, the supply of affordable housing is insufficient.

Affordable housing, as defined in the Municipal Code, means dwelling units restricted to the housing size and type for individuals meeting asset, income, and minimum occupancy guidelines approved and published for Mono County by the Department of Housing and Urban Development (HUD). The following criteria must be met to meet the HUD requirements: units must be provided in a mix of affordabilities for low and median income households; units for sale shall be deed restricted so that resale prices are limited to the percentage of increase in the median household income level for Mono County; units for rent shall be restricted so the increases in rent are limited to the percentage of increase in the median household income level for Mono County as established by HUD; and affordable rents shall not exceed 30 percent of the applicable household income category, including utilities, per California Government Code Section 65589.5(g). The Town is developing additional income criteria to factor in the higher cost of housing, which is above that for Mono County as a whole.

The median price for a house in the Town in 2002 was \$515,000; for a condominium, the median price was \$249,750. Just four years earlier, in 1998 the median price for a house was

\$235,000 and for a condominium \$88,000 (Mammoth Multiple Listing Service, Market Analysis 1998). Over a four year period, house and condominium prices have increased approximately 119 percent and 184 percent, respectively. According to the 2000 Census, 34.3 percent of homeowners spent 35 percent or more of their household income on their mortgage and selected monthly owner costs in 1999. At the same time, 31.5 percent of renters were spending more than 35 percent of their income on rent.

Housing Supply

Lack of housing options for year-round residents and the seasonal workforce has been an issue for more than 30 years and is a common problem in resort areas. Estimates for the existing General Plan, show that the demand for renter occupied housing units could be 2,360 units, 1,160 more than in year 2000. Compounding the current and projected housing problems are seasonal residents and rising rents and mortgages. The seasonal workforce places special demands on housing since fluctuating need and rising rents/mortgages can put units out of financial reach of tenants who need them. Several constraints to the production of affordable housing were cited in the existing Housing Element and include the following: land cost and availability; construction and financing costs; utility constraints; energy conservation and seismic requirements of the UBC; and Town processing and development fees.

Since the adoption of the first Housing Element in 1992, the Town has taken the following proactive measures in an effort to address the housing issues facing the community: 1) the Town Council adopted Affordable Housing Mitigation Regulations (AHMR); 2) the people of the Town approved an ordinance that increased the Transient Occupancy Tax (TOT) to provide revenues for the development of affordable housing; 3) Mammoth Lakes Housing, Inc., a nonprofit housing development corporation, was established with an initial operating budget of \$201,500 with contributions from the Mammoth Mountain Ski Area, Intrawest Corporation, and the Town; 4) the Town formally created the Town Housing Trust Fund, which currently has over \$2,000,000 in assets; and 5) the Town adopted a Reasonable Accommodation ordinance. These programs directly contributed to the creation of over 282.5 deed restricted, affordable residential units in the Town. The affordable housing projects approved as of July 23, 2004 are outlined in Table 4.9-5 on page 4-227.

In addition to those listed in Table 4.9-5, housing provisions for the Intrawest projects include approximately 214 bedrooms throughout the Town that are either for sale at the median income level, or rented at low and very low income levels. The total number of deed restricted bedrooms (existing or planned) in the Town is approximately 572. Land dedicated for affordable housing totals 4.34 acres and \$3,043,480 is the total amount of fees paid other than in-lieu fees. The Affordable Housing Mitigation Ordinance allows developers to submit Alternative Housing Mitigation Plans. These lands and funds have been given to the Town through this mechanism.

Table 4.9-5**Affordable Housing Supply in the Town**

	Affordable Units	Bedrooms	Conditions
L'Abri Condominiums	2	4	Town purchased 2 units for use by their employees, not deed restricted
Bristlecone Apartments	30	77	All units rent restricted to very low income occupants for 33 years
Glass Mountain Apartments	25	27	All units rent restricted to very low income occupants
Condominium Conversions Hamilton	1	2	One 2-bedroom unit of the 3 units to be rent restricted to low income
Hooper Mixed Use Two Projects on Sierra Park Road	9	18	8 units for sale restricted to 120 percent of median income, 1 unit at 80 percent of median income
Mammoth Hospital	1	20	1 2-bedroom unit for rent in the L'Abri condominiums, 20 bedrooms purchased throughout the Town
Main Street Housing Project		101	To be allocated to various Intrawest projects; units would be rented to low income residents
Gibbs Mixed Use Meridian and Old Mammoth Roads	2	2	2 studio units are deed restricted to low income
Hooper Mixed Use Center Street	2	4	Two 2-bedroom units are deed restricted to low income
Presson Apartments	1	3	One 3-bedroom unit was deed restricted to low income
Schuyler Mixed Use	2	3	Deed restricted to low income
Davis Condominiums	1	3	Deed restricted to very low income
Snowcreek			Town accepted 4.34 acres of vacant land in lieu of construction of mitigation units
8050			Town accepted \$3 million in lieu of construction of mitigation units

Table 4.9-5 (Continued)**Affordable Housing Supply in the Town**

	Affordable Units	Bedrooms	Conditions
Mountain Boulevard	8	16	Sales are deed restricted to low income
Tallus		6	Two bedrooms provided as on-site employee unit, four bedrooms provided by purchase of transient rental unit and deed restricted to low income levels
Mammoth Lakes Family Housing	48	120	43 units at very low income levels, 5 units at very, very low income levels (50 percent of median)
Meridian Court	24	50	Nine units at low income levels, 15 units at moderate or above moderate but deed restricted at various levels
Small Commercial and Industrial Project			Paid in-lieu fee as per the AHMR
<hr/> <i>Source: Town of Mammoth Lakes Building Permit Records, 2005</i>			

The Alternative Housing Mitigation Plan provides developers with alternatives to constructing their mitigation housing while still addressing the demand for housing created by their project. The land and money is held by the Town for development of mitigation housing. The Town has partnered with Mammoth Lakes Housing, Inc. to capitalize on these resources and leverage them through the State and Federal Grant process.

Employment

According to the State of California Employment Development Department, Labor Market Division (EDD), the civilian labor force in Mono County in September of 2003 was 6,410 persons (Labor Force Data for Sub-County Areas). An estimated 390 persons were unemployed in September 2003 resulting in an unemployment rate of approximately six percent. As of September 2003, the labor force in the Town was an estimated 3,590 persons, which accounted for approximately 56 percent of Mono County's total. The unemployment rate for the Town was 7.9 percent. It is important to note that these data have not been seasonally adjusted and is derived by multiplying current estimates of county-wide employment by the employment and unemployment percentages of each subcounty area that were calculated at the time of the Census.

Most jobs in the Planning Area depend directly or indirectly on tourism and recreation. According to the 2000 Census, the largest employment sectors included the following: arts, entertainment, recreation accommodation, and food services industries (37.1 percent of the workforce); educational, health, and social services (11.2 percent of the work force); finance, insurance, real estate, and rental and leasing (10.8 percent of the workforce); and retail (9.8 percent of the workforce). 4.3 percent of the workforce was unemployed while the remainder of the workforce was employed in a variety of smaller employment sectors.

In 2002, Town staff prepared The Town Resident Housing and Transit Needs Assessment (Assessment). The employer survey respondents (100 employers) employed a maximum of 3,272 persons during the 2001-2002 winter season and 3,305 maximum during the 2000-2001 winter season. These numbers include management, owners, and part-time staff. The town's analyses were supported by Employment Development Department (EDD) data that showed 3,740 persons employed in January 2002. Findings from the Assessment showed that 15 percent of respondent employers did not achieve full staffing and that there was a shortage of 43 total workers. Seventy-seven percent of respondent employers cited lack of housing as a contributing factor. In addition, 15 percent of respondent employers were not satisfied with the quality of employees they hired and 67 percent of those respondents attributed lack of housing as a factor.

According to the 2000 Census, median per capita income was \$24,526 in 1999 with 14.4 percent of individuals and 8.7 percent of families below the poverty level. As of January 2002, the median household income in Mono County was \$46,000.

4.9.2 REGULATORY FRAMEWORK

State Level

State Affordable Housing Requirements

AB 1866

In 1982 California enacted the Second Unit Law (better known as the "Granny Unit" law, Government Code Section 65852.2) to encourage the development of accessory dwelling units (ADUs). The accessory units are defined as attached or detached residential dwelling units with complete independent living facilities for one or more persons, on the same parcel as a single family home. The legislation authorized local governments to permit ADUs by enacting a local ordinance, and gave local agencies considerable discretion over the criteria and standards that would apply.

Based on evidence that 1982 law was not achieving desired ends due to obstacles at the local level, the California legislature passed AB 1866 in 2003 which amended Government Code Section 65852.2. AB 1866 prohibits conditional use (or similar) review processes and

established that ADUs must now be permitted by right as long as zoning standards are met. Since AB 1866 requires zoning consistency, implementation is subject to local discretionary action. However, legislative action is under review that would restrict the ability of local agencies to impose standards that thwart the state goal of reducing the shortage of housing in California.

SB 1818

The state recently enacted SB 1818, which took effect in January of 2005. SB 1818 amends density bonus laws, Government Code Section 65915 in a number of ways, including a reduction in the number of affordable units required to obtain a bonus, and an increase in the size of the maximum density bonus from 25 percent to 35 percent. Applicants are also eligible for a new land donation density bonus, and local agencies are required to offer at a minimum of one to three incentives (such as reductions in setbacks) based on the percentage of affordable units provided a development. SB 1818 also limits parking requirements that may be imposed by the local agency (California Housing Law Advocates 2005). The provisions of SB 1818 are not subject to local control.

Town of Mammoth Lakes

Affordable Housing Mitigation Regulations

The Town Council adopted the Affordable Housing Mitigation Regulations (AHMR) on October 4, 2001 (amended July 2004) as a mitigation strategy to offset the impacts on affordable housing in the Town resulting from new development. The AHMR are intended to address the gap between new housing demands created by new development and supply created by other means. The AHMR specifies the method and manner by which the developer shall satisfy the requirements for Employee Housing Units (EHU). A formula is used to estimate the number of full-time equivalent employees for each business type. The result is that new development is required to provide housing for the estimated number of its full-time equivalent employees (FTEE).

A Housing Mitigation Development Plan (HMDP) must be submitted along with the project generating the need for the housing. Housing must be provided at 250 sq. ft. per FTEE. Chapter 17.36 of the Zoning Code Amendment 2004-05 states that each developer would submit to the Town for approval a definitive HMDP which shall contain the following specific and detailed information:

- The housing requirements generated by their project as defined herein;
- The method or combination of methods by which housing is to be mitigated;

- The timetable for the mitigation;
- A description of the land proposed and the type, number, and unit size of the proposed housing plus any management/operational plan;
- Preliminary plans showing the site and floor plans;
- The proposed rent or sales process for very low, low, and median income households; and
- A statement as to the way that the HDMP meets the intent of these regulations (17.36.040).

On-site housing is preferred. However, the regulations do allow Alternate Housing Proposals, which may deviate from the requirement for new construction of on-site affordable housing, but must result in a greater housing benefit than strict adherence to the regulations. In the interest of having existing housing units acquired, rehabilitated and restricted as affordable housing, the Commission shall consider Alternate Housing Proposals that include such an acquisition and rehabilitation component provided that the Commission finds the proposal provides a greater community affordable housing benefit. Regardless of whether housing is provided on site or off site through acquisition and rehabilitation, the majority of the units must be available for rent. Affordability levels range from 80 percent to 200 percent of median household income with the majority being affordable to households making median income or less.

Commercial projects of less than 5,000 square feet, resort or residential projects of less than one-half acre, and all industrial projects may pay a fee in lieu of providing housing. To encourage on-site housing in commercial projects beyond the mitigation regulations, shared parking is permitted.

Transient Occupancy Tax

In March 2002, the people of the Town approved an ordinance that increased the Transient Occupancy Tax (TOT) in order to provide 1/12th of all TOT revenues for the development of affordable housing (approximately \$600,000 per year).

Reasonable Accommodation Ordinance

Sections 17.76.070 through 17.76.150 of the Municipal Code (Reasonable Accommodation) regulates housing for persons with disabilities. The purpose of these code sections is to provide reasonable accommodation for persons with disabilities seeking fair access to housing in the application of its zoning and building regulations. In making a determination regarding the reasonableness of a requested accommodation, the following factors (stated in Section 17.76.110) shall be considered:

- Special need created by the disability;

- Potential benefit that can be accomplished by the requested modification;
- Potential impact on surrounding uses;
- Physical attributes of the property and structures;
- Alternative accommodations that may provide an equivalent level of benefit;
- In the case of a determination involving a one-family dwelling, whether the household would be considered a single housekeeping unit if it were not using special services that are required because of the disabilities of the residents;
- Whether the requested accommodation would impose an undue financial or administrative burden on the town; and
- Whether the requested accommodation would require a fundamental alteration in the nature of a program. (Ord. 02-05 §1 (Att. A (part)), 2002)

4.9.3 THRESHOLDS OF SIGNIFICANCE

Based upon Appendix G in the CEQA Guidelines, the project would be considered to have a significant impact on population, housing, or employment if the project would:

- 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); or
- Displace substantial numbers of existing housing or residents, necessitating the construction of replacement housing elsewhere.

For purposes of this analysis it was assumed that a substantial population growth would be one that results in a significant impact to an environmental resource.

4.9.4 IMPACTS AND MITIGATION

Issue 4.9-1: Would the project 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)?

Discussion. The purpose of the Updated Plan is to provide for the orderly growth of the Town, define the limits to that growth and act as a mechanism to accommodate and control future growth. The Updated Plan would neither induce nor foster, that is, cause, this growth to occur. It is interesting to note that while the existing General Plan provided growth capacity in 1987 for 17,396 housing units of all sorts and 61,376 PAOT, both somewhat greater than proposed in the Updated Plan, nowhere close to that growth has actually occurred. This is

because the General Plan does not actually cause or induce growth, but is instead dependent on demand for recreational and related opportunities which has its principal origins in other parts of California and the West. As these regions grow, and southern California, as the dominant source of this demand, will be under tremendous growth pressure for the next 20 years, demand on the recreational potential in and around the Town of Mammoth Lakes would also continue to grow.

The intent of the project is to serve as a blueprint for the physical development of the community and a foundation for optimizing land use decisions based on goals and policies related to land use, transportation, population growth and distribution, development, open space, resource preservation and utilization, infrastructure, and other related physical social and economic factors. In comparison to the existing peak PAOT of 34,265, the Updated Plan would accommodate a peak PAOT of 60,700, for an increase in 26,431 persons.

As shown in Table 4.9-6 on page 4-234, the Updated Plan at buildout would result in a reduction of 686 residential units compared with the existing General Plan, with the majority of this reduction occurring in multi-unit transient housing (reduction of 680 units).³⁸ The Updated Plan proposes a reduction of six non-transient residential units. However, the Updated General Plan contains additional policies such as limiting Shady Rest to primarily workforce housing and permitting workforce housing within the IP zone. These policies would enhance opportunities for workforce housing increasing the availability of these units to residents through deed restrictions. Therefore, the reduction in residential units would not impact resident housing supply.³⁹

In terms of non-residential areas, in comparison with the existing General Plan, the Updated Plan would result in an increase of 20 acres of industrial land. Buildout of the Updated Plan would result in an increase of 154,233 square feet of industrial uses. In addition, while no change would occur in the amount of land designated for commercial uses, the Updated Plan in comparison with the existing General Plan, would allow for an increase of 85,000 square feet of commercial/office use.

The existing General Plan would allow for up to 17,396 dwelling units and the proposed Updated Plan would allow up to an estimated 16,710 dwelling units. The Updated Plan would result in a total population of ~~60,680~~ approximately 60,700 people, which is slightly less than the projected population of 61,376 under the existing General Plan. The Town is not changing or enlarging the area covered by the City's UGB so that the amount and location of growth is

³⁸ *This category includes all attached dwelling units within the Resort, Specific Plan, Commercial General, Commercial Lodging and Residential Multi-family 2 zones which are either intended for transient occupancy or can be rented out on a nightly basis. These include all hotel, motel, fractional and resort condominium lodging as well as condominium units which are privately owned and can be rented out on a nightly basis.*

³⁹ *Ownership and residency provided by the Town of Mammoth Lake Building Permit Data Base.*

Table 4.9-6

**Incremental Development for Buildout of the Proposed 2024 General Plan
Compared with the Existing General Plan**

Land Use	Incremental Change
Single Family Non-transient	-20 units / 0 acres
Single Family Transient	0 units / 0 acres
Mobile Home	0 units / 0 acres
Multi-Unit Non-transient	14 units / 20 acres
Multi-Unit Transient	-680 units / 0 acres
Industrial	154,233 sq. feet / 20 acres
Commercial/Office Use	8,500 sq. feet / 0 acres

Source: Town of Mammoth Lakes, 2005

controlled within the UGB. Additional commercial/office and industrial areas are designed to meet the service needs of both residents and visitors. The jobs provided by these non-residential uses would provide for a better jobs/housing balance.

The Updated Plan does not provide for the extension or expansion of roadways into the area. In addition, the Updated Plan does not result in an increase in the capacity of existing infrastructure so as to provide for an increase in population beyond that which is allowed under build-out of the General Plan Update. Therefore, the Updated Plan would not indirectly provide for a substantial increase in population.

The Town includes an Urban Growth Boundary, which limits the geographic area in which growth could occur. A number of comments to the original NOP requested information as to how project implementation might impact the carrying capacity of the Mammoth area. While there is no universally accepted formula for determining carrying capacity, most definitions refer to the largest number of a given species that a habitat can support indefinitely. When that sustainable level is surpassed, the resource base and the dependent population begin to decline. The recent increase in population and housing growth in the Mammoth Area indicates that the region has not reached a carrying capacity with respect to human habitation, although declines in some plant and wildlife resources suggest that carrying capacity may have been surpassed for some species.

In this context, the population and housing growth capacities associated with the project would be anticipated to impact Mammoth Lakes in a number of ways. Among the secondary effects would be an increased demand upon the Town's public services and utilities, a change in the appearance of the town consistent with a more dense population and built environment, increases in traffic and air pollutant emissions, more demand upon recreational facilities and open space/natural areas, changes in the cohesiveness of residential neighborhoods and potential incompatibility of adjacent land uses, increased night lighting, and other effects discussed

throughout this Revised Draft PEIR. The impacts to these resources are addressed in Section 4.1 (Aesthetics), Section 4.4 (Geology), Section 4.6 (Hydrology), Section 4.10 (Public Services and Utilities) Section 4.2 (Air Quality), Section 4.11 (Recreation and Open Space), Section 4.3 (Biology), Section 4.7 (Land Use), and Section 4.12 (Transportation and Circulation).

Based on the above, while the Updated Plan would accommodate a relatively substantial increment of population growth, it would neither directly nor indirectly induce that growth or cause it to occur. Rather, the project will shape the location, form, and behavior of the growth increment should external demand be sufficient.

Mitigation Measures

The Updated Plan would not induce substantial population growth either directly or indirectly. Therefore, no mitigation measures are necessary.

Level of Significance After Mitigation

The Updated Plan would result in a less than significant impact with regard to the inducement of a direct or indirect substantial population growth.

***Issue 4.9-2:** Would the project displace substantial numbers of existing housing or residents, necessitating the construction of replacement housing elsewhere?*

Discussion: The Updated Plan does not include any changes to the Housing Element. The project would increase, as compared to the existing condition, commercial space, lodging rooms, and recreation and tourist opportunities, thus increasing employment opportunities and staffing needs. The project emphasizes modest growth based on tourism and recreation and promotes increased visitation, length of stay, and occupancy rates, which would create an increased demand for employees. Table 4.9-6 shows the incremental development for buildout under the Updated Plan in comparison with the existing General Plan.

As shown in Table 4.9-6, the Updated Plan at build-out would result in a reduction of 686 residential units compared with the existing General Plan, with the majority of this reduction occurring in multi-unit transient housing (reduction of 680 units).⁴⁰ The Updated Plan proposes a reduction of six non-transient residential units. However, the Updated General Plan contains additional policies such as limiting Shady Rest to workforce housing and permitting workforce

⁴⁰ This category includes all attached dwelling units within the Resort, Specific Plan, Commercial General, Commercial Lodging and Residential Multi-family 2 zones which are either intended for transient occupancy or can be rented out on a nightly basis. These include all hotel, motel, fractional and resort condominium lodging as well as condominium units which are privately owned and can be rented out on a nightly basis.

housing within the IP zone. These policies would enhance opportunities for workforce housing increasing the availability of these units to residents through deed restrictions. Therefore, the reduction in residential units would not impact resident housing supply.⁴¹

The Updated Plan increases commercial/office sq. footage by 8,500 sq. feet, industrial uses by 20 acres and increases residential units by 6,839 units. In order to determine the employment that would potentially be generated through implementation of the project, averages of the employee generation rates stated in the AHMR (based on different land uses) were used. Based on the AHMR rates, the project would generate approximately 1,517 additional full-time employee equivalents (FTEE). The FTEE is an aggregation of full-time, part-time, and seasonal employment that yields an average year-round employment rate. The majority of the jobs created under the Updated Plan would be within the services and retail trade industries providing services to the transient units these are historically lower paying jobs. Increased staffing needs could, therefore, lead to an increased demand for affordable/workforce housing. The project's emphasis on modest growth and stability and the resultant increase in employment opportunities would have a positive impact on employment and the local economy.

The project would allow for construction of new housing units (including affordable housing) and increased utilization of residential property. Up to 16,710 residential units would be allowed in the Planning Area under the project. There are currently 9,871 residential units. The project would result in an increase of approximately 6,839 residential units. This would include affordable housing units, which would result in a beneficial impact to housing conditions in the Town.

The recreation-based service economy of Mammoth Lakes depends upon a labor pool of individuals working at low paying jobs. Where there is a lack of affordable housing in the low to moderate income range, these households typically occupy more expensive units and either overpay, overcrowd the unit, or commute from other areas of work. The project emphasizes development of affordable housing units to provide housing for low to moderate income families. One hundred fifty-six affordable housing units have already been approved. This is in addition to the over 282 deed restricted, affordable residential units in the Town. The Updated Plan provides density bonuses for the creation of affordable housing as well as allowing affordable housing in the IP designation. Therefore, the Updated Plan would result in the development of additional affordable housing units over the existing General Plan.

A General Plan Update could result in the displacement of housing units if land designated for residential use were changed to a non-residential designation. However the updated General Plan does not propose any changes of existing residential uses to non-residential

⁴¹ *Ownership and residency provided by the Town of Mammoth Lake Building Permit Data Base.*

uses. In fact, the Updated Plan proposes increased affordable housing opportunities within the IP zone through density bonuses and through the redesignation of a portion of land from HDR to HDR-1, which would prohibit transient residential units in the future preserving more land for resident housing.

Mitigation Measures

The project would not displace substantial numbers of existing housing units or residents and therefore, no mitigation measures are necessary.

Level of Significance After Mitigation

The Updated Plan would result in a less than significant impact with regard to the displacement of substantial numbers of existing housing or residents.