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## V. GENERAL IMPACT CATEGORIES

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### A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.”*

Based on the analysis contained in this EIR, implementation of the Project would result in significant unavoidable environmental impacts relative to the following:

- **Aesthetics.** The Project would result in significant unavoidable impacts to public views and scenic vistas, visual character, and light and glare. The Project would result in significant impacts to scenic vistas by altering the visual character of the site, which would be apparent to viewers looking south toward the Sherwin Range from public areas near the Project site. The Project would represent a substantial change in the visual character of the Project site by constructing housing and resort uses on a formerly undeveloped meadow. Although the Project would be required to implement and be consistent with all Town ordinances related to outdoor lighting, the introduction of light and glare on a formerly undeveloped meadow would create a new source of light or glare that would be noticeable and would expand the existing lit footprint of the Town.
- **Air Quality.** The Project would result in significant unavoidable impacts to air quality from Project construction generated PM<sub>10</sub> emissions as well as cumulative impacts from construction generated PM<sub>10</sub> emissions. These PM<sub>10</sub> emissions that cannot be reduced to zero with the implementation of the recommended mitigation.
- **Utilities.** The Project would result in significant unavoidable cumulative impacts to water supply. Even with full implementation of various planned water supply projects, it is expected that insufficient water would be available to meet projected demand during a single dry year. Therefore, because these future water sources do not exist at present the Project’s contribution to overall water supply demand within the Town would be cumulatively considerable.

Despite these significant unavoidable impacts, the Project is being proposed to allow the construction of previously proposed and planned for land uses, to provide these land uses in the smallest environmental footprint and with the greatest amount of open space area, to provide needed housing and employment opportunities to Town residents, and to provide recreational amenities to the Town residents and visitors.

## B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECTS

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of the ways in which a proposed action could be growth inducing. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the *CEQA Guidelines* reads as follows:

*“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”*

The Project includes development of a total maximum of 1,050 new dwelling units and 75,000 square feet of non-residential development. The Project would include condominiums, workforce housing, a resort Hotel and non-residential development. As discussed in detail in Section IV.J (Population and Housing), implementation of the Project would increase the permanent residential population on the Project site by 2,562 persons.<sup>1</sup> Current population patterns in the Town indicate that households similar to those proposed by the Project are not occupied year round; therefore this is a conservative estimate. This new on-site residential population would likely patronize local businesses and services in the area, fostering economic growth. Although the Project would provide short-term employment opportunities, which would likely be filled from the local employee base and from construction specialists (e.g., crane operators, steelworkers, masons, etc.) that move from job site to job site as dictated by the demand for their skills, the permanent jobs associated with the Project’s 75,000 square feet of non-residential space would serve the convenience needs of residents and would be accessible from within the site only. Because it is not expected that the nature of the jobs that would be provided by the Project would cause employees from surrounding areas to relocate their places of residence to the Project area, the Project would not result in long-term employment growth in the area. However, for a conservative analysis, as previously discussed in section IV.J (Population and Housing), it is assumed that all 925 employees would relocate to the area, introducing 925 employee-related residents to the Town through indirect population growth due to permanent jobs. The Project is not a regionally-significant employer, and although the Project would provide employment opportunities, fostering some economic growth, most of

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<sup>1</sup> United States Census Bureau, *Census 2000*; [www.census.gov](http://www.census.gov), CAJA staff, March 14, 2006.

the jobs would likely be filled by people in the local employment base, and the Project would not induce additional population growth.

The Project site is located in an area that is surrounded by open space and residential land use developments and is served by existing roadways, utility infrastructure, and service systems. The Mammoth Community Water District provides sanitary sewer and water service to majority of the Project site, but does not serve the 94 acres acquired in the 2005 United State Forest Service (USFS) Land Exchange. The amount of water consumed and wastewater generated by the Project would not require or result in the construction of new treatment facilities or the expansion of existing facilities. Additionally, the Project would not require new or expanded water entitlements. The permitted landfill in Mono County has the capacity to accommodate the Project's solid waste disposal needs. The Project would participate in the Town's recycling and refuse collection service to the Project site. The Project would not require the expansion of landfill capacity. Therefore, the Project would not foster population growth by removing an obstacle to growth.

The Project site is located in a developed, urban area with existing public services (i.e., police, fire protection, schools, parks and recreation and snow removal). Public services to the Project site and area are currently provided by the Town of Mammoth Lakes Police Department, the Mammoth Lakes Fire Protection District, Mammoth Unified School District, the Town of Mammoth Lakes Parks and Recreation Department, the Town of Mammoth Lakes Public Works Department and Caltrans, respectively. As discussed in Section IV.K (Public Services), the residential population generated by the Project would result in an increased demand for the public services provided by the agencies listed above. Although the police and fire departments would need to hire new staff to accommodate the demands created by the Project, no new or altered police or fire protection facilities would be needed. The Project would require new school facilities for the school district serving the Project area. However, based on Section 65996 of the California Government Code, the Project applicant would be required to pay the established Developer Impact Fees. The payment of such fees is deemed to fully mitigate the impacts of new development on school services. The proposed recreational amenities in conjunction with the Town's current facilities and the collection of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the Project's demand for parks and recreational services.<sup>2</sup> (see Appendix M) Therefore, the Project would not tax the existing community services facilities by requiring the construction of new public facilities that would cause significant environmental effects.

As discussed in greater detail in Section III (Project Description), the Project would involve a revision to the 1981 Master Plan that would result in replacement of the 1981 Master Plan with a new master plan. The new master plan would change the land area and land uses set forth in the 1981 Master Plan for the remaining portion of the Snowcreek Master Plan area that has not been developed. The Project would

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<sup>2</sup> Town of Mammoth Lakes Municipal Code Chapter 15.16 §15.16.085 part E, CAJA staff, April 14, 2006.

require an amendment to the 1987 General Plan. The 1987 General Plan is currently in the process of being updated following a four-year planning and review process. A Draft Program EIR was previously prepared and circulated regarding an earlier version of the General Plan Update. A Notice of Preparation (NOP) for the Draft Program EIR was distributed on April 25, 2003. A Draft Program EIR was prepared and distributed to the public for review in April from February to May 2005 and was revised in September 2005 for public comments. Based on the extent and range of comments received, the Town determined that the proposed General Plan should be revised to the extent that required recirculation of a Revised Draft Program EIR. The Revised Draft Program EIR was circulated for public review from October 31, 2005 to December 14, 2005. The Town adopted the 2007 General Plan on August 15, 2007 and is currently considering the Revised Final Program EIR on the General Plan Update for certification. Because the certification of the Revised Final Program EIR is an ongoing process, the standard for analysis used in this Draft EIR is based on both the 1987 General Plan and the 2007 General Plan.

The 1987 General Plan land use designations for the Project site are Resort (R), Open Space (OS), and Open Space Stream Corridor (OSSC). These land use and zoning designations describe the design focus for development at the Project site. The 2007 General Plan also designates the Project site as Resort (R) and Open Space (OS). The R designation allows commercial mixed uses including visitor lodging, amenities and services, and workforce housing.

The Resort (R) designation is generally applied to large parcels capable of providing a complete resort experience as found in the Snowcreek, Sierra Star and Juniper Ridge resort areas of the Town. As described in greater detail in Section II (Environmental Setting) and Section IV.H (Land Use & Planning), a Resort development should provide mixed uses consistent with a mountain resort experience, offering distinctive services and activities. The development should be planned with activities appropriate for the area, which may include visitor lodging, recreational amenities, commercial services that support the resort atmosphere, meeting spaces, transit facilities and interconnections to the community's and public trail systems. The design of the area should assure a functional and distinctive pedestrian-scaled environment that will encourage visitors to return to the Town.

The Open Space (OS) designation is applied to lands that have significant recreational or environmental values and permits development of facilities that support the environmental and recreational objectives of the community. The Project would be consistent with the Resort and OS land use designations.

The Project does not require a General Plan amendment to the 2007 General Plan. However, a General Plan amendment is required to the 1987 General Plan. The requested 1987 General Plan amendment necessary to adopt the Snowcreek VIII, Snowcreek Master Plan Update - 2007 is not a precedent-setting action that could lead to growth, given that such actions occur often and are a regular aspect of the planning process for towns and counties. The degree to which the requested discretionary action associated with the Project would encourage or facilitate other amendments to the General Plan for areas in the vicinity of the Project site to allow uses that are not consistent with the existing land use designations and zoning cannot be estimated at this time. If in the future such actions were requested, the

Town would review those requests on a case-by-case basis to determine the appropriateness of the actions and whether the actions would lead to any significant environmental impacts, as is currently being done for the Project. To allow changes to the land use designation and zoning of any property within the Town is solely at the discretion of the Town decision-makers and is exclusive of the Project.

Additionally, the Project site and surrounding area are part of a “built environment.” Thus, if other amendments to the General Plan and zone changes are requested in the future for other properties in the area, the subsequent development that would occur due to approval of the changes would not necessarily be growth inducing, considering that most of the properties in the Project area are already developed with some type of use. For these reasons, the Project would not be considered growth inducing.

### **C. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT**

Section 15126.2(c) of the *CEQA Guidelines* states that significant irreversible environmental changes associated with a proposed project shall be discussed, including the following:

- (a) Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- (b) Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- (c) Irreversible damage that could result from environmental accidents associated with the project.

The Project site is located in an urbanized area of the Town. Development of the Project would represent a long-term commitment to a more intensive land use of the site. As a result, the Project would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials.

The Project includes development of a total maximum of 1,050 new dwelling units and 75,000 square feet of non-residential development. The Project would include condominiums, workforce housing, a resort hotel and non-residential development in an urbanized area that is already served by an existing roadway system and utility infrastructure. As stated previously, the 1987 and 2007 General Plan land use designations for the Project site are Resort (R) and Open Space (OS), which are characterized with primary emphasis to visitor lodging, amenities and services and recreation uses. Development in the Resort designation is generally applied to large parcels and is physically connected internally and to all primary visitor oriented destinations with an integrated system of streets, sidewalks, and recreational paths. In addition, the OS land use designation is restricted to recreational uses. Therefore, implementation of the Project would commit future generations to using the Project site for similar uses.

With the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in residential and retail/commercial settings, the Project would not involve the routine use, transport, or disposal of hazardous materials. Also, during Project construction the Project applicant would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. No significant environmental (contamination) issues occur at the site, and no further investigations relative to the environmental conditions on the site are needed. Therefore, the Project would not result in irreversible damage that could result from environmental accidents associated with the Project.