

4.10 PUBLIC SERVICES

This section provides an analysis of the potential environmental impacts on public services and resulting environmental effects from implementation of the Land Use Element/Zoning Code Amendments and the Mobility Element Update. The public service analysis is divided into five sections: Fire Protection, Police Protection, Schools, Parks and Recreation, and Library Services.

1. FIRE PROTECTION

This section analyzes the Project's potential effects on fire protection and emergency medical services provided by the Mammoth Lakes Fire Protection District (MLFPD). The analysis addresses fire protection facilities and services, response times, and emergency access. The analysis is based, in part, on information provided by the MLFPD, included in Appendix E of this Draft EIR. A comment letter addressing fire protection was provided by the Mammoth Lakes Fire Protection District in response to the May 29, 2015 Notice of Preparation circulated for the Project. The comment letter indicates a need to evaluate the roadway network and provision of services to an increased number of people concentrated in the Town's downtown area. In addition, issues are raised regarding the reconfiguration of Main Street anticipated in the Mobility Element Update relative to access point and shade/shadow. For an analysis of shade/shadow see Section 4.1, Aesthetics, of this EIR.

a. Environmental Setting

(1) Regulatory Framework

State of California

Senate Bill 1241

To address the increasing issues at the wildland-urban interface, Senate Bill 1241 requires the legislative body of a city or county to adopt a comprehensive, long-term General Plan that includes various elements, including, among others, a Safety Element for the protection of the community from unreasonable risks associated with, among other things, wildland and urban fires. Specifically, SB 1241 requires cities or towns that are revising their Housing Element of the General Plan on or after January 1, 2014, to also review and update their Safety Element to address the risk of fire in state responsibility areas and very high fire hazard severity zones. Provisions of Senate Bill 1241 are not applicable to the Project, but will be addressed as part of the next required update of the Town's 2014-2019 Housing Element and the next update of the Town's Safety Element.

Mono County

Mono County Office of Emergency Services

The mission of the Mono County Office of Emergency Services (OES) is to ensure Mono County is adequately prepared, able to respond to, and recover from the effects of emergencies. The Mono County OES coordinates the activities of all county departments and the response efforts of local, state, and federal agencies including: the Town of Mammoth Lakes, US Forest Service, Los Angeles Department of Water and Power, California Office of Emergency Services, California Highway Patrol, Caltrans, Mono County Fire

Districts, US Marine Corps (USMC) Mountain Warfare Training Center, Mammoth Unified School District, and Eastern Sierra Unified School District.

Mono County Emergency Medical Services

Mono County Emergency Medical Services (EMS) is responsible for emergency medical calls and inter-facility ambulance transports within Mono County including Mammoth Lakes. Mono County EMS utilizes close working relationships with local Fire Departments helps to maximize available personnel and resources to provide emergency services. Mono County EMS employs a combination of Paramedics and Emergency Medical Technicians (EMTs). Mono County EMS employs over 20 paramedic/EMT/firefighters which staff four advanced life support ambulances around the clock, usually with two paramedics, and one reserve fully-equipped ALS ambulance. Mono County EMS operates under a physician medical director, and is authorized to perform state-of-the-art advanced medical procedures in the field through a comprehensive medical protocol system.¹

Mutual Aid and Service Agreements

Mono County contains eleven fire protection districts, all of which belong to a county fire service chiefs association and are party to a countywide mutual aid agreement. The agreement formalizes the procedure for each district to send personnel and equipment to fires and emergencies beyond district boundaries when needed. The districts have also established informal service areas for the unserved private lands that are outside of any local fire protection district. These informal service areas reflect a recognized responsibility of the districts to assist in the protection of life and property in such areas.

Town of Mammoth Lakes

General Plan

The Public Health and Safety Element of the 2007 General Plan aims to improve the quality of life for those living and working in the Town. The intent of the Public Health and Safety Element is to support, provide and encourage facilities and services that are important to a livable and safe community. Goals and polices support fire protection and emergency response programs and facilities, provision of prompt response times, and encourage adequate funding and access service to fire protection services.

Municipal Code

Chapter 15.04.010 of the Town of Mammoth Lakes Municipal Code “Building Code” was enacted for the purpose of adopting rules and regulations pursuant to the state housing law and the Health and Safety Code, for the protection of the public health, safety and general welfare of the occupants and the public. In addition, the Code governs the creation, construction, enlargement, conversion, alteration, repair, moving, removal, demolition, occupancy, use, height, fire protection, sanitation, ventilation, and maintenance of any building used for human habitation.

In compliance with Municipal Code Section 15.16, Article II and Resolution 15-32, the Town adopted an updated Development Impact Fee (DIF) schedule in 2015 and collects development fees on behalf of the MLFPD for fire facilities, vehicles and equipment. The Town currently collects between \$1,560 to \$1,182 for

¹ <http://www.monocounty.ca.gov/ems/page/about-mono-county-ems>. Accessed September 23, 2015.

development of single-family homes; \$745 to \$1,561 per unit for multi-family homes; \$2,022 per unit for commercial and office uses; and \$993 per unit for industrial uses.²

The MLFPD adopted Ordinance 2013-01, which included the adoption of the 2013 Fire Code, applicable sections of the California Building Code, California Residential Code, and California Mechanical Code all of which comprise the Life Safety Code for the MLFPD. Ordinance 2013-01, governs the safeguarding of life and property from fire and explosion hazards arising from the storage, handling and use of hazardous substances, materials and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises within the MLFPD service area. Ordinance 2013-01 requires that one and two family single-family homes, townhomes, multi-family units, and commercial uses larger than 5,000 feet install an automatic fire sprinkler system and all commercial structures are required to include an automatic fire alarm system. Automatic sprinklers are also required to be installed in buildings without sprinkler systems if the uses within a building change.

(2) Existing Conditions

The MLFPD is a fire protection district that provides fire protection and emergency response to the Town of Mammoth Lakes. Additionally, the MLFPD provides fire protection services and emergency response to the upper middle fork of the San Joaquin, Red's Meadow, and Devil's Postpile National Monument (DEPO) located in Madera County.

The Mono County EMS program provides the primary emergency medical response services in Mammoth Lakes. The MLFPD acts as a backup for the Mono County paramedic unit and also provides first responder service in the Town. The MLFPD and Mono County EMS does not generally provide emergency medical response services to Mammoth Mountain as Mammoth Mountain has its own emergency medical service personnel, but will respond if requested.

In addition to this area served, the MLFPD also serves the Highway 395 corridor from the Mammoth Yosemite Airport to the Crestview Rest Area at the bottom of Crestview grade. Services the MLFPD provides include fire prevention and suppression services, search and rescue, medical services, wildland firefighting, hazmat handling, technical rescue, fuel reduction programs, hydrant testing, school safety programs, community education, permit approvals and development proposal reviews.

The MLFPD provides structural fire protection from two stations in Mammoth Lakes. Station #1 is located at 3150 Main Street and is approximately 17,618 square feet. It houses the MLFPD's administrative offices, full time personnel, and the Mono County paramedic unit stationed in Mammoth Lakes. Station #1 was expanded in 2007 and the addition included administrative offices, bunk rooms, a larger training room, elevator, conference room, and a telecom/computer room.³ Fire Station #2 is an approximately 5,673 square foot facility that is located at 1574 Old Mammoth Road. This facility includes a training area and a drill tower. The MLFPD has eight full-time career firefighters and 45 part-time paid call personnel. **Table 4.10-1, Fire Station Equipment**, lists the fire apparatus available at the two stations.

² *Town of Mammoth Lakes Development Fee Schedule, July 1, 2015.*

³ *Fire Marshall/Division Chief Thom Heller, Mammoth Lakes Fire Protection District, email correspondence October 9, 2015.*

Table 4.10-1

Fire Station Equipment

Station No. 1	Station No. 2
2 Type I Engines	2 Type I Engines
Type III Engine	75 ft Quint
100 ft Aerial Platform	
3000 gal Water Tender	
BLS Ambulance	
Type II US&R Trailer	
Type II HazMat Trailer	

Note: Additional vehicles and equipment include: 4 command vehicles, a 1-ton crew cab pickup, Moorbark brush chipper and Bobcat Toolcat used by the fuels management crew, a Case 620 loader for snow removal and various utility vehicles.

Source: Fire Marshall/Division Chief Thom Heller, Mammoth Lakes Fire Protection District., email correspondence October, 9, 2015.

The MLFPD is in the process of planning a new station at Mammoth Mountain Main Lodge area with the private development of the base facility (including two pieces of apparatus: an engine and a ladder); acquisition of another engine and a light/air support truck for overall coverage within the Town; relocation of the MLFPD training tower; and new quarters for a student firefighter program. The MLFPD also plans to participate with the Town on an intersection management program for ease of movement through town during emergencies.⁴

The MLFPD goal is to meet the national standard of a four minute response time for fire and emergency services. According to the MLFPD, this is typically achievable within the Town under normal road conditions. However, calls during inclement weather and to outlying areas such as Mammoth Ski area, Red Meadow, and the Lakes Basin can extend the response time beyond four minutes.

During 2014, there were 651 calls for service for the MLFPD. Of these 281 were EMS related calls and 370 were fire related calls.⁵ According to the MLFPD, EMS calls have increased in the Town and across the country as a result of fire districts and departments becoming more involved in EMS related activities. MLFPD has become more involved in EMS calls, hazardous materials calls, and in search and rescue operations. In response to the changing need, the MLFPD has required that all equipment operators and Captains must have EMT certification and all new firefighters must obtain EMT training.⁶

In addition to MLFPD facilities, equipment, and personnel, the Town is also served by other fire protection agencies through a mutual aid agreement with the MLFPD. Mono County contains eleven fire protection districts, all of which belong to a county fire service association and part of a countywide mutual aid agreement. The districts have also established informal service areas for the unserved private lands that are outside of any local fire protection district. These informal service areas reflect a recognized moral, but not legal, responsibility of the districts to assist in the protection of life and property in these areas. The MLFPD

⁴ *Ibid*

⁵ *Mammoth Lakes Fire Protection District. Fire and EMS Combined List by Incident Number (1/01/2014 to 12/13/2014).*

⁶ *Fire Marshall/Division Chief Thom Heller, Mammoth Lakes Fire Protection District. email correspondence, October 9, 2015.*

maintains an automatic aid agreement with the Long Valley FPD to serve the Geothermal Plants, Mammoth Yosemite Airport, and US 395. The MLFPD also maintains mutual aid agreements with the Bureau of Land Management (BLM), the US Forest Service (USFS), and the California Department of Forestry and Fire Protection (CDF).

MLFPD requires a fire hydrant every 250 feet along the streets of Mammoth Lakes. In addition, the MLFPD also requires that new construction meet the National Fire Protection Association (NFPA) requirements for fire protection flows. In conjunction with the Mammoth Community Water District, MLFPD has been able to adequately meet these requirements.

The Insurance Services Office (ISO) is a private organization that supplies information used by underwriters to evaluate and price particular risks, including fire protection. ISO staff gathers information on individual properties and communities and, in turn, insurers use that information in underwriting personal and commercial property insurance, commercial liability and workers compensation policies. The Town currently has a fire rating of three, as a result of an Insurance Service Office evaluation conducted within the Town. Fire ratings range from one to ten, with one representing the best rating.⁷

b. Methodology and Thresholds

(1) Methodology

The analysis of impacts on fire protection and emergency services addresses the potential increase in population in the commercial districts and the Town as a whole resulting from the removal of the density cap as part of the General Plan amendments and the ability of the MLFPD to adequately serve the existing and future population in the Project vicinity. The analysis also includes potential impacts related to the circulation improvements identified in the Mobility Element Update.

Based on consultation with the MLFPD, a determination was made as to whether fire protection and emergency services and facilities could accommodate the additional demand for fire protection and emergency resulting from the Project without the need for a new facility or the alteration of existing facilities.

(2) Thresholds

For purposes of this EIR, the Town has utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether a project would have a significant environmental impact regarding fire protection and emergency services. The Project would have a significant impact if the Project would:

FIRE-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

⁷ *Municipal Service Review And Sphere of Influence Recommendation, Mammoth Lakes Fire Protection District Mono County, California, October 2009.*

(3) Applicable General Plan Goals/Policies and Adopted Mitigation Measures

This section provides the applicable General Plan goals and policies as well as measures from the adopted Mitigation Monitoring and Reporting Program (MMRP) from the General Plan Update and the Trails System Master Plan.

General Plan

The following is a list of goals and policies contained in the 2007 General Plan Update Public Health and Safety Element that are applicable to the Project:

Fire

- **Policy S.3.L:** All construction shall comply with wildland fire-safe standards, including standards established for emergency access, signing and building numbering, private water supply reserves available for fire use, and vegetation modification.
- **Policy S.3.M:** Involve local fire department in the development review process.
- **Policy S.3.N:** Minimize the incidence of fires by supporting the Mammoth Lakes Fire Protection District's (MLFPD) ability to respond to emergencies.
- **Policy S.3.O:** Support provision of adequate water flow throughout the town and provision of adequate water storage to meet peak fire demand during times of peak domestic demands.
- **Policy S.3.P:** Maintain mutual aid agreements with other fire and emergency service agencies.
- **Policy S.3.Q:** Support creation and maintenance of firebreaks in coordination with Inyo National Forest and other land management agencies.

Emergency Preparedness

Goal S.4: Maintain adequate emergency response capabilities.

- **Policy S.4.A:** Aid emergency vehicle access and emergency evacuation of residents and visitors by providing and maintaining secondary access routes to all portions of the community, consistent with the Mammoth Lakes Fire Protection District (MLFPD) requirements.
- **Policy S.4.B:** Maintain an Emergency Plan.
- **Policy S.4.C:** Cooperate with emergency response agencies to maintain preparedness to respond to all types of emergencies.

Trails Master Plan Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) for the Trails Master Plan includes a mitigation measure applicable to fire protection. Since this is an adopted MMRP, for purposes of this EIR, the following measure is applied where applicable to address the impacts of the Project:

TSM 4.G-1.A: As individual projects are implemented under the TSMP, the Town shall undertake actions when applicable to reduce the risk of wildfires. On National Forest lands, these actions shall be coordinated with the USFS to ensure consistency with that agency's standards and guidelines. Specific actions may include but are not limited to: 1) maintain and incorporate design features to facilitate use of MUPs and other facilities, where feasible and appropriate to accommodate emergency vehicles; 2) provide signage at trail heads and along trails relating to fire prevention (i.e., No Smoking signs, fire danger level signs); 3) provide fuel modification and other fuel treatment applications within Project Areas where appropriate; 4) ensure the maintenance and patrol of trails in the Project Area; and, 5) enforce curfews or other rules to limit unwanted activity in Project Areas during daylight hours and after-hours.

c. Environmental Impacts

Threshold FIRE-1: The project would result in a significant impact if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

Impact Statement FIRE-1-A: *Implementation of the Land Use Element/Zoning Code Amendments would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services. Therefore, the Land Use Element/Zoning Code Amendments would result in a less than significant impact with regard to fire protection and emergency services.*

Land Use Element/Zoning Code Amendments

As described in Chapter 2, Project Description, of this EIR, the proposed Land Use Element/Zoning Code Amendments would result in the removal of the existing unit and room caps in the commercial districts and would allow a maximum of 2.0 FAR. Provisions of the Community Benefits Incentive Zoning (CBIZ) and Transfer Development Rights (TDR) would be amended to remove previous allowances for developers to increase the density and/or to transfer the density of proposed projects.

The proposed removal of the density cap could result in an increase in residential and hotel densities within the commercial districts and, thus, could introduce more people to these areas. Specifically, the proposed Land Use Element/Zoning Code Amendments could increase the amount of the development as compared to the development otherwise occurring in the C-1 and C-2 areas by an additional 336 residential units; up to 467 hotel rooms; and approximately 152,533 square feet of commercial floor area. As discussed in Section 4.9, *Population and Housing*, of this EIR, the population that could be accommodated by such development could result in an increase of up to 1,978 people including visitors and permanent residents beyond the currently projected population within the commercial districts along Main Street and Old Mammoth Road.

This increase could result in increased demands for fire protection and emergency services including vehicles, personnel, and equipment.

The proposed amendments would not alter existing adopted development standards and building code requirements, including requirements for automatic sprinkler systems, alarms, smoke and carbon monoxide detectors and other fire suppression requirements. Other development standards such as setbacks, snow storage, and egress and ingress requirements for emergency access would also remain the same.

Furthermore, these changes would occur in the downtown area of the Town, in a developed, urban area that is in close proximity to the main Mammoth Lakes Station #1 located at 3150 Main Street which was substantially expanded and improved in 2007. In addition, future development that would occur as a result of the Land Use Element/Zoning Code Amendments would be subject to the latest California Building Code and California Fire Code requirements.

The proposed amendments include the removal of the People At One Time (PAOT) cap, which represents the total peak population of permanent and seasonal residents and visitors, and implementation of a Project Impact Evaluation Criteria (PIEC) approach to evaluate development. While the Town is removing the density cap and prior approach to regulating overall development, analysis would still be conducted to evaluate the potential impacts of new development. Under the PIEC, the evaluation of project impacts would occur on a project-by-project basis through use of the PIEC criteria. The criteria would include evaluations of issues that might affect the provision of fire protection and emergency services such as transportation, water supply and capacity impacts. An impacts-based approach is intended to help ensure that growth in the Town would not exceed the carrying capacity of infrastructure or public services and that the potential for significant environmental impacts would be identified and mitigated, if necessary, to the extent feasible.

As discussed earlier, any new development would be subject to the development impact fees that currently range from \$745 to \$1,182 per unit of new residential development and between \$993 to \$2,022 for non-residential uses. Furthermore, as described above, the Town's General Plan includes a number of policies intended to reduce impacts to fire protection and emergency services. Given the recent upgrades to Station 1 and plans for a new station at the Mammoth Mountain Main Lodge area, no additional stations are expected to be constructed. In addition, future development would be required to comply with development standards and regulations in place at the time of such development. As such, impacts to fire protection and emergency services resulting from the Land Use Element/Zoning Code Amendments would be less than significant.

Mobility Element Update

Impact Statement FIRE-1-B: *Implementation of the Mobility Element Update would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, the impact to fire services would be less than significant.*

As outlined in Chapter 2, *Project Description*, of this EIR the Mobility Element Update provides a framework for the provision of an interconnected network of streets, mid-block connectors, paths, sidewalks, trails, and transit and bike facilities that aim to improve multimodal access, disperse traffic, improve emergency access,

and reduce congestion. To that end, the Mobility Element Update designates various vehicle, transit, bicycle, and pedestrian safety improvements including new traffic signals, a system of signage and wayfinding for vehicles and pedestrians, new medians and sidewalks, enhanced mid-block connections; improved intersection geometry; new and improved bicycle paths, lanes, and routes; new transit stops, new pedestrian underpasses and bridges; and improved visibility and lighting in key areas.

In addition, the Mobility Element Update includes the vacation of the frontage roads and conversion of Main Street to a four-lane cross-section with a center median and turn pockets, which would likely be phased in over time. Preliminary phases to provide basic infrastructure and pedestrian access would be constructed by the Town with major capital works being driven by new development on Main Street. The Mobility Element Update requires that implementation of these various improvements is to be consistent with snow removal operations and emergency access needs.

Principle and Policies contained in the Mobility Element Update related to fire protection and emergency services include:

Mobility Principle: Safety: A safe system is fundamental. The transportation system must be safe for all users during all seasons and times of day, particularly during the winter when ice and snow contribute to safety hazards. The transportation system must also accommodate the Town's emergency response system.

- **Policy M.1.2:** Provide an interconnected network of streets, mid-block connectors, paths, sidewalks, trails, and bike facilities that improve multimodal access, disperse traffic, improve emergency access, and reduce congestion.
- **Policy M.1.4:** Emphasize public safety in the planning and design of the transportation system by balancing timely emergency response with vehicle, pedestrian, and bicyclist safety.

Construction activities associated with the reconfiguration of Main Street to a four lane road, construction of medians, new landscaping, new bicycle and pedestrian paths, and various other improvements associated with the Mobility Element Update may cause temporary lane closures or other access issues that would affect the provision of adequate fire and emergency response times. The reconfiguration of Main Street, which would result in the removal of the frontage road and the placement of future buildings closer to the street, would likely take place over a number of years. Consistent with Action M.1.4.1 of the Mobility Element Update, the Town would coordinate with MLFPD to plan for and ensure appropriate emergency access and response times as part of implementation of the Mobility Element Update. As such, before construction of any transportation improvements including the reconfiguration of Main Street, the MLFPD would be consulted to avoid or minimize interference with fire protection and emergency vehicle access. The Mobility Element Update would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts; therefore, impacts would be less than significant.

Mitigation Measures

With compliance with applicable policies and action statements in the Town's General Plan, impacts would be less than significant and no mitigation measures would be necessary.

Level of Significance After Mitigation

Impacts relative to fire protection would be less than significant with compliance with applicable policies and action statements in the Town's General Plan.

d. Cumulative Impacts

The analysis of the impact of the Land Use Element/Zoning Code Amendments on fire protection services is cumulative in nature because it evaluates the effects of the amendments in combination with the General Plan buildout. As indicated above, with compliance with applicable regulations and the payment of fees, the Land Use Element/Zoning Code Amendments and Mobility Element Update would result in a less than significant impact on fire protection and emergency services. Implementation of the Mobility Element Update would expand and better connect the physical roadway network of Mammoth Lakes, provide intersection capacity-enhancing improvements (new signals), expand the existing transit system, and provide bicycle and pedestrian-related improvements and improve the overall circulation in the Town as a whole. Any future projects would be subject to the Town's development review process as well as the applicable building and fire code requirements in effect at the time of development and would also be required to pay applicable development impact fees established by the MLFPD. Any future development projects or improvements associated with the Mobility Element Update would be developed in compliance with applicable development standards, including setbacks, as well as access routes, street widths and other standards contained in the Mobility Element Update. Therefore, the Project would not contribute to cumulative significant impacts to fire protection and emergency services.

2. POLICE PROTECTION

This subsection addresses potential impacts on law enforcement services that could occur as a result of the Project. Law enforcement services in the Town are provided by the Mammoth Lakes Police Department (MLPD). The analysis focuses on the MLPD facilities that currently serve the Town and the ability of the MLPD to provide police protection services with the implementation of the Project. The analysis, which is based in part on information provided by MLPD, including statistical data regarding police protection facilities, services and response times, is included in Appendix E of the Draft EIR. Crime statistics included in this analysis were obtained from the State of California Department of Justice, Criminal Justice Statistics Center database.⁸

a. Environmental Setting

(1) Regulatory Framework

Mono County

Mono County Office of Emergency Services

The mission of the Mono County Office of Emergency Services (OES) is to ensure Mono County is adequately prepared, able to respond to, and recover from the effects of emergencies. The Mono County OES coordinates the activities of all county departments and the response efforts of local, state, and federal

⁸ *State of California Department of Justice, Criminal Justice Statistics Center, Crime in California, Mammoth Lakes, August 2015*
<https://oag.ca.gov/crime/cjsc/stats/crimes-clearances>.

agencies including: the Town of Mammoth Lakes, US Forest Service, Los Angeles Department of Water and Power, California Office of Emergency Services, California Highway Patrol, Caltrans, Mono County Fire Districts, US Marine Corps (USMC) Mountain Warfare Training Center, Mammoth Unified School District, and Eastern Sierra Unified School District.

Town of Mammoth Lakes

General Plan

The Public Health and Safety Element of the 2007 General Plan aims to improve the quality of life for those living and working in the Town. The intent of the Public Health and Safety Element is to support, provide and encourage facilities and services that are important to a livable and safe community. Goals and policies related to law enforcement and safety support police programs and facilities, promote prompt response times, and encourage adequate funding and access to police services.

Municipal Code

Section 15.16.080 Article II, Development Impact Mitigation Fees, of the Town of Mammoth Lakes Municipal Code establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.081.B, establishes a development impact fee (DIF) program to fund law enforcement facilities, vehicles and equipment. Section 15.16.080 also provides that DIF and other fees are to be regularly reviewed and updated to ensure that they are accurate and fair. Currently the law enforcement DIF is \$143 for single-family homes, \$122 for mobile homes, \$149 for multi-family units, \$0.99/square feet for commercial uses, \$0.39/square feet for office uses, \$0.25/square feet for industrial uses, and \$287/room for lodging.⁹ As part of the regular review of DIF and other fees, the Town recently commissioned an independent assessment of the DIF program. The DIF Study identified a list of law enforcement equipment and facilities that may be eligible for use of DIF funds for implementation. The DIF Study identified the potential funding stream for two (2) new police vehicles over a 20 year period and the development of a new 4,500 square feet police station.¹⁰

(2) Existing Conditions

Police protection and law enforcement in the Town are provided by the MLPD, the Mono County Sheriff's Department (MCSD), and the California Highway Patrol (CHP). The MLPD provides all police services including traffic related services within the Town's incorporated boundary except for along SR 203 where CHP also provides traffic related services. The MLPD also provides first responder services to the Lakes Basin recreation area which includes the Twin Lakes, Lake Mary, Lake Mamie and Horseshoe Lake areas; the Shady Rest campground area and the Reds Meadow recreation resort area in Madera County through a contract with the US Forest Service.

The MCSD is responsible for jail operations (for persons arrested in both the Town and outside the Town limits) and provides coroner operations, processing and serving civil paperwork, and search and rescue

⁹ *Town of Mammoth Lakes, Development Impact Fee Schedule, July 1, 2015.*

¹⁰ *Development Impact Fee Study, Town of Mammoth Lakes, prepared by TischlerBise June 23 2015.*

operations. The MCSD provides dispatch services to the MLPD and the Mammoth Lakes Fire Protection District under a contractual agreement.¹¹

The MLPD offers the following specialized crime enforcement teams: Patrol Division, Traffic Division, a part time School Resource Officer, Sexual Assault Response Team (a cooperative division that also includes the Mono County District Attorney's Office, medical personnel; Mono County Mental Health counselors, and Wild Iris Family Services); The MPLD is a part of the Mono County Investigative Unit. MLPD provides one officer to assist with county wide detective services. The MLPD maintains one drug detection canine. The MLPD staff is comprised of 11 full time sworn officers, four part time sworn reserve officers, three full time civilian staff, and one contracted full time employee. The MLPD currently owns 10 black and white vehicles, one non-emergency police services vehicle and three unmarked police vehicles. The average time to all calls (emergency and non-emergency) is six minutes 22 seconds. The MLPD goal is to respond to in progress and emergency calls for service within five minutes of when the 911 call is received.¹²

Table 4.10-2, *Crime Statistics for the Town of Mammoth Lakes 2010-2014*, provides information on the number and type of criminal arrests in the Town from 2010 to 2014. Crime data is categorized as Violent Crime, which include crimes that generally include a weapon, bodily injury, or robbery; Property Crime, which are crimes that generally result in damage to property including theft, burglary, or forced entry; and Arson which can include damages to structural, vehicle/mobile or other property. As shown in Table 4.10-2, law enforcement arrests have decreased by roughly 49 percent from 2010 to 2014 with the year(s) 2013 and 2014 having the lowest number of arrests over the five years (171 in 2013 and 139 in 2014). The decreases include reductions in violent and property crimes. A partial reason for the decrease in crime is the decrease in staffing levels within the MPLD. This is a natural trend when programs or staffing is decreased.

The MLPD station is currently located at 568 Old Mammoth Road. The 4,000 square foot facility includes offices and a booking area. Since the Town does not maintain a jail facility, the MLPD transfer offenders requiring holding to the Town of Bridgeport, approximately 56 miles north. The Mammoth Lakes Town Council recently approved the funding and permits for a new MLPD facility with a planned completion date of December 2017.¹³ The current plan for the MPPD facility is an approximate 5,200sq ft building near the existing Mono County Superior Court. There are no plans to increase staffing levels based on moving to a new facility.

b. Methodology and Thresholds

(1) Methodology

The analysis of impacts on law enforcement addresses the Project's potential increase in population in the commercial districts and the Town as a whole resulting from the removal of the density cap as part of the General Plan amendments and construction and operational impacts related to implementation of the circulation improvements identified in the Mobility Element Update and the ability of MLPD personnel to adequately serve existing and future population in the Project vicinity. The analysis presents information

¹¹ Chief Al Davis Mammoth Lakes Police Department., electronic mail correspondence, August 3, 2015.

¹² Chief Al Davis Mammoth Lakes Police Department., electronic mail correspondence, August 3, 2015.

¹³ Chief Al Davis Mammoth Lakes Police Department, e mail correspondence, August 3, 2015.

Table 4.10-2

Crime Statistics for the Town of Mammoth Lakes 2010-2014

Crime Statistics	2010	2011	2012	2013	2014
Violent Crime	46	38	38	18	28
Homicide	0	0	0	0	0
Rape	8	5	3	0	1
Robbery	2	4	9	5	3
Aggravated Assault	36	29	26	13	24
Property Crime	230	244	196	152	111
Burglary	68	66	54	33	21
Motor Vehicle Theft	6	22	2	6	2
Larceny-Theft	156	156	140	113	88
Arson	1	0	0	1	0
Grand Total	277	282	234	171	139

Source: State of California Department of Justice, Criminal Justice Statistics Center, Crime in California, Mammoth Lakes, August 2015

provided by the MLPD and statistical information available from the State of California Department of Justice for the Town of Mammoth.

Based on consultation with the MLPD, a determination was made as to whether police facilities could accommodate the additional demand for police protection services resulting from the Project without the need for a new facility or the alteration of existing facilities.

(2) Thresholds

For purposes of this EIR, the Town has utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether a project would have a significant environmental impact regarding police protection services. The project would have a significant impact if the project would:

- POL-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.

(3) Applicable General Plan Goals/Policies and Adopted Mitigation Measures

There are no mitigation measures in the adopted Mitigation Monitoring and Reporting Programs associated with the 2007 General Plan Update or the Trails Master Plan regarding law enforcement. However, the 2007 General Plan includes numerous goals, policies and actions to support and improve public safety and emergency services. The following General Plan Public Health and Safety Element goals, policies, and actions are applicable to law enforcement services:

Public Safety

Goal S.2: Keep Mammoth Lakes a safe place to live, work and play.

- **Policy S.2.A:** Maintain safe and efficient municipal operations and services.

Police Enforcement

- **Policy S.2.B:** Ensure effective code enforcement and policing programs.
- **Policy S.2.C:** Provide public safety facilities at multiple locations to facilitate prompt response times.
- **Policy S.2.D:** Increase public access to police services.

Emergency Preparedness

Goal S.4: Maintain adequate emergency response capabilities.

- **Policy S.4.A:** Aid emergency vehicle access and emergency evacuation of residents and visitors by providing and maintaining secondary access routes to all portions of the community, consistent with the Mammoth Lakes Fire Protection District (MLFPD) requirements.
- **Policy S.4.B:** Maintain an Emergency Plan.
- **Policy S.4.C:** Cooperate with emergency response agencies to maintain preparedness to respond to all types of emergencies.

c. Environmental Impacts

Threshold POL-1: The project would result in a significant impact if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.

Impact Statement POL-1-A: *Implementation of the Land Use Element/Zoning Code Amendments would not result in the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, the Project would result in a less than significant impact with regard to law enforcement.*

Land Use Element/Zoning Code Amendments

As described in Chapter 2, Project Description, of this EIR, the proposed Land Use Element/Zoning Code Amendments would result in the removal of the existing unit and room caps in the commercial districts and would allow a maximum of 2.0 FAR. Provisions of the Community Benefits Incentive Zoning (CBIZ) and Transfer Development Rights (TDR) would be amended to remove previous allowances for developers to increase the density and/or to transfer the density of proposed projects.

The proposed removal of the density cap could result in greater residential and hotel densities within the commercially designated areas than currently projected. Thus, the additional increase that could occur with the removal of the room and unit cap could introduce more people in the downtown area. The amendments could result in an additional 336 residential units and up to 467 hotel rooms, and approximately 152,533 square feet of commercial floor area, beyond what was projected under the existing General Plan buildout. As discussed in Section 4.9, Population and Housing, of this EIR, the population that could be accommodated by such development could result in an increase of up to 1,978 people including visitors and permanent residents. This increase in population could result in increased demands for police services including vehicles, personnel, and equipment. However, the proposed amendments would not alter the other established development standards such as setbacks, snow storage, lighting standards, site security requirements, parking standards, and other development standards. Furthermore, an increase in activity and population in an area does not necessarily indicate that the crime rate in that area would increase along with an increase in opportunities for crime. A number of other factors contribute to the resultant crime rate, such as police presence, crime prevention measures, and on-going legislation/funding. Also, the addition of new residential, commercial, and hotel uses and pedestrian activity along Main Street and Old Mammoth Road would create more 'eyes on the street' along these main corridors and thus could serve to deter crime.

The Land Use Element amendments include the removal of the People At One Time (PAOT) which represents the total peak population of permanent and seasonal residents and visitors. The, PAOT would be replaced with the use of a Project Impact Evaluation Criteria (PIEC) approach to evaluate development. While the Town is removing the density cap and prior approach to regulating overall development, analysis would still be done to evaluate the potential impacts of future development. Under the PIEC, the evaluation of project impacts would occur on a project-by-project basis through use of the PIEC criteria. The criteria would include evaluations of issues that might affect the provision of police and emergency services such as transportation, noise, and land use impacts. An impacts-based approach is intended to help ensure that growth in the Town would not exceed the carrying capacity of infrastructure or public services and that the potential for significant environmental impacts would be identified and mitigated, if necessary, to the extent feasible.

As discussed earlier, the Town recently approved funding and the construction of a new MLPD station with a planned completion date of December 2017. The Town also identified the funding stream for the purchase of two (2) new police vehicles over a 20 year period. The DIF also would serve to further ensure that potential impacts to police protection services would be reduced. Furthermore, as individual projects are developed, the MLPD would be consulted for review of site plans, recommendations on security, and coordination regarding site safety.

Therefore, impacts to police services are considered to be less than significant. Any future development that could occur in the downtown area as a result of the Land Use Element/Zoning Code Amendments would be required to pay DIF that would be used to assist the MLPD in the development of needed facilities, equipment and staff. Future development would be required to comply with applicable development standards and regulations in effect at the time of the development. As such, impacts to police services would be less than significant.

Mobility Element Update

Impact Statement POL-1B: *Implementation of the Mobility Element Update would not result in the need for new or physically altered police protection facilities, the construction of which could cause*

significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, the Mobility Element Update would result in a less than significant impact with regard to law enforcement.

As outlined in Chapter 2, Project Description, the Mobility Element Update provides a framework for the provision of an interconnected network of streets, mid-block connectors, paths, sidewalks, trails, and transit and bike facilities that aim to improve multimodal access, disperse traffic, improve emergency access, and reduce congestion. To that end, the Mobility Element Update designates various vehicle, transit, bicycle, and pedestrian safety improvements including new traffic signals, a system of signage and wayfinding for vehicles and pedestrians, new medians and sidewalks, enhanced mid-block connections; improved intersection geometry; new and improved bicycle paths, lanes, and routes; new transit stops, new pedestrian underpasses and bridges; and improved visibility and lighting in key areas.

In addition, the Mobility Element Update includes the vacation of the frontage roads and conversion of Main Street to a four-lane cross-section with a center median and turn pockets, which would likely be phased in over time. Preliminary phases to provide basic infrastructure and pedestrian access would be constructed by the Town with major capital works being driven by new development on Main Street. The Mobility Element Update requires that implementation of these various improvements be consistent with snow removal operations and emergency access needs.

Policies and Actions contained in the Mobility Element Update related to police protection include:

Mobility Principle: Safety: A safe system is fundamental. The transportation system must be safe for all users during all seasons and times of day, particularly during the winter when ice and snow contribute to safety hazards. The transportation system must also accommodate the Town's emergency response system.

- **Policy M.1.2:** Provide an interconnected network of streets, mid-block connectors, paths, sidewalks, trails, and bike facilities that improve multimodal access, disperse traffic, improve emergency access, and reduce congestion.
- **Policy M.1.4:** Emphasize public safety in the planning and design of the transportation system by balancing timely emergency response with vehicle, pedestrian, and bicyclist safety.
- **Action M.1.4.1:** Work with Mammoth Lakes Fire Protection District and Mammoth Lakes Police Department to plan for and ensure appropriate emergency access and response times.

Construction activities associated with the reconfiguration of Main Street to a four lane road, construction of medians, new landscaping, new bicycle and pedestrian paths, and various other improvements associated with the Mobility Element Update may cause temporary lane closures or other access issues that would affect the provision of adequate law enforcement response times. In addition, reconfiguration of Main Street, which would include the removal of the frontage road and the placement of future buildings closer to the street, would likely take place over a multi-year year period. During that period, road and site access may be limited that could potentially hinder law enforcement vehicle access. Consistent with Action M.1.4.1 in the

Mobility Element Update, the Town would coordinate with the MLPD to plan for and ensure appropriate emergency access and response times as part of implementation of the Mobility Element Update. Thus, the Mobility Element Update would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant.

Mitigation Measures

With compliance with applicable policies and action statements in the Town's General Plan, impacts would be less than significant and no mitigation measures would be necessary.

Level of Significance After Mitigation

Impacts relative to police services would be less than significant with compliance with applicable policies and action statements in the Town's General Plan.

d. Cumulative Impacts

The analysis of the impact of the Land Use Element/Zoning Code Amendments on law enforcement services is cumulative in nature because it evaluates the effects of the Project in combination with the General Plan buildout. As indicated above, the Land Use Element/Zoning Code Amendments would result in a less than significant impact on law enforcement services. The Mobility Element Update would result in the expansion of the physical roadway network of Mammoth Lakes, including more connectivity and the provision of intersection capacity-enhancing improvements (new signals), expand the existing transit system, and provide bicycle and pedestrian-related improvements and improve the overall circulation in the Town as a whole. Any future projects would be required to comply with existing development standards and regulations as well as the access routes, street widths and other standards contained in the Mobility Element Update. In addition, the required payment of development impact fees would be used to assist the MLPD in the development of needed facilities, equipment and staff. Therefore, the Project would not contribute to a significant cumulative impact to law enforcement services.

3. SCHOOLS

This section evaluates potential impacts on school facilities operated by the Mammoth Unified School District (MUSD). The section discusses elementary, middle, and high schools operated by MUSD, as well as compliance with applicable regulations. The analysis estimates the number of students that would be generated by the Project and determines whether MUSD school facilities would have sufficient available capacity to accommodate these students. The analysis is based, in part, on school enrollment and capacity information provided by MUSD, which is included in Appendix E of the Draft EIR.

a. Environmental Setting

(1) Regulatory Framework

State of California

California Educational Code

Educational services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. The governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.¹⁴

Kindergarten-University Public Education Facilities Bond Act

Kindergarten-University Public Education Facilities Bond Act of 2002 (Prop 47) was approved by California voters in November 2002. This act provided a bond issue of \$13.05 billion to fund education facilities to relieve overcrowding and repair older schools. Funds were targeted at areas of greatest need and can also be used to upgrade and build new classrooms in the California Community Colleges, the California State University, and the University of California to accommodate growing student enrollment.

Leroy F. Greene School Facilities Act of 1998.

In combination with the \$9.2 billion education bond act approved by the voters in 1998 (Prop 1A), the Leroy F. Greene School Facilities Act, known as SB 50, reformed methods for the financing of school construction in California. The act included a new school facility program by which school districts can apply for state construction and modernization funds, imposed limitations on the power of cities and counties to require mitigation of school facilities impacts as a condition of development approval, and provided authority for districts to levy fees at three different levels based on specific factors such as the number of students on year-round schedules, debt levels, use of temporary classrooms, degree of public investment in local bond efforts, available state funding, and other considerations.

Town of Mammoth Lakes

General Plan

The Public Health and Safety Element of the 2007 General Plan aims to improve the quality of life for those living and working in the Town. The intent of the Public Health and Safety Element is to support, provide and encourage facilities and services that are important to a livable and safe community. Goals and policies related to educational services within the Public Health and Safety Element aim to support high quality educational services and life-long learning resources within the Town.

School Developer Fees

Pursuant to California Education Code §17620(a)(1), the governing board at any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the

¹⁴ *California Education Code Section 17620(a)(1).*

district, for the purpose of funding the construction or reconstruction of school facilities. The MUSD currently charges developer fees of \$2.63 per square foot of residential development and \$0.42 per square foot of commercial development.¹⁵ Pursuant to Government Code Section 65995, the payment of these fees mitigates all potential impacts from development projects on school facilities to a less than significant level.¹⁶

(2) Existing Conditions

The MUSD provides education to students in grades kindergarten (K) through grade 12 within the Town of Mammoth Lakes and the Crowley Lake area. School facilities include Mammoth Elementary School, Mammoth Middle School, Mammoth High School, and Sierra High School (Continuation Education School). As shown in **Table 4.10.3, Student Enrollment and Capacity for the MUSD 2015-2016 School Year**, the total current enrollment in MUSD schools is approximately 1,194 students for the 2015-16 school year.

Table 4.10-3

Student Enrollment and Capacity for the MUSD 2015-2016 School Year

School Name	Enrollment	Capacity
Mammoth Elementary School	576	450
Mammoth Middle School	272	325
Mammoth High School	331	525
Sierra High School	15	25
Total	1,194	1,325

Source: Brooke Bein, Mammoth Unified School District. January 2016

According to MUSD, overall student enrollment at all schools has been fairly static over the past 10 years, and does not tend to fluctuate.¹⁷ As shown below, student enrollment is below the capacity of Mammoth Middle School, Mammoth High School and Sierra High School. However, the number of students currently enrolled at Mammoth Elementary School (576 students) exceeds the 450 student capacity at this school. The additional 126 students are accommodated within 12 portable classrooms.

Although not over capacity, Mammoth Middle School utilizes two portable classrooms and Mammoth High School utilizes eight portable classrooms. In addition, MUSD intends to remodel/upgrade the Mammoth High School and add new classrooms at Mammoth Elementary School and Mammoth Middle School.

b. Methodology and Thresholds

(1) Methodology

The analysis of enrollment effects on schools is based on the ability of MUSD school facilities to accommodate the potential increase in students generated by future development that could occur as a

¹⁵ Brooke Bein, Mammoth Unified School District. January 2016.

¹⁶ Calif. Government Code § 65996.

¹⁷ Brooke Bein, Business Services Manager, Mammoth Unified School District. January 2016.

result of the Land Use Element/Zoning Code Amendments. The analysis also addresses state regulations (i.e., SB 50) and related development fees as mechanisms for providing new school facilities and mitigating school impacts of the Project. Implementation of the Mobility Element Update would result in improvements to the Town's transportation network and would not generate new students. Therefore, since the improvements would not affect population growth in the Town the Mobility Element Update is not evaluated relative to schools.

(2) Thresholds

For purposes of this EIR, the Town has utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether a project would have a significant environmental impact regarding school services. The Land Use Element/Zoning Code Amendments would have a significant impact if the project would:

- SCH-1** Require the addition of a new school or the expansion, consolidation or relocation of an existing facility to maintain existing service levels.

(3) Applicable General Plan Goals/Policies and Adopted Mitigation Measures

There are no mitigation measures in the adopted Mitigation Monitoring and Reporting Program associated with the 2007 General Plan Update or the Trails System Master Plan regarding school services. The 2007 General Plan includes numerous goals, policies and actions to support and improve education resources in the Town. The following General Plan Public Health and Safety Element goals, policies, and actions are applicable to school services:

Education

Goal S.5: Support high quality educational services and life-long learning resources within the community.

- **Policy S.5.A:** Encourage development and enhancement of school sites and other administrative, educational and recreational facilities.
- **Policy S.5.B:** Support expansion of educational opportunities within the community.

c. Environmental Impacts

Threshold SCH-1: The Project would result in a significant impact to schools if it would require the addition of a new school or the expansion, consolidation or relocation of an existing facility to maintain existing service levels.

Impact Statement SCH-1 *The Land Use Element/Zoning Code Amendments would generate a need for new student space at the elementary, middle and high schools. However, any future development associated with the Land Use Element/Zoning Code Amendments would pay the required development fees as mechanisms for providing new school facilities and mitigating school impacts. Therefore, Impacts would be less than significant.*

As described in Chapter 2, Project Description, of this EIR, the proposed Land Use Element/Zoning Code Amendments would result in the removal of the existing unit and room caps in the commercial districts and would allow a maximum of 2.0 FAR. Provisions of the Community Benefits Incentive Zoning (CBIZ) and Transfer Development Rights (TDR) would be amended to remove previous allowances for developers to increase the density and/or to transfer the density of proposed projects.

The proposed removal of the density cap would accommodate greater residential densities within the Main Street and Old Mammoth Road neighborhoods and, thus, could introduce more people to these areas. These amendments could increase the General Plan estimated buildout by an additional 336 residential units. It is estimated that 252 of the 336 units, or 75 percent of the units, would be occupied by residents of the Town and not by visitors. This could result in an additional 136 new students¹⁸ and therefore could result in increased demands for school services.

Based on the developer fees established by the MUSD, future development would be required to pay \$2.63 per square foot of residential development and \$0.42 per square feet of commercial development or the applicable fee in place at the time of obtaining a building permit. In addition, based on a discussion with the MUSD, staff indicates the schools that would serve the Project area have experienced relatively flat enrollment and the number of students has not changed substantially in approximately a decade. Therefore, it is unlikely that the introduction of residential densities would result in a substantial fluctuation in enrollment. As stated previously, as provided in Section 65996 of the California Government Code the payment of the required fees is deemed to fully mitigate the impacts of new development on school services. Therefore, with payment of the required developer fees, Project impacts to schools would be less than significant.

Mitigation Measures

Potential impacts to schools would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Potential impacts to school services as a result of Project implementation would be less than significant, and no mitigation measures would be required.

d. Cumulative Impacts

The analysis of the impact of the Land Use Element/Zoning Code Amendments on school services is cumulative in nature because it evaluates the effects of the Project in combination with the General Plan buildout. Future projects would be required to pay the developer fees established by the MUSD and as stated previously, provided in Section 65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on school services. As such, the Land Use Element/Zoning Code Amendments would result in a less than significant impact with regard to schools and would not contribute to a cumulatively significant impact.

¹⁸ Potential student generation rate was calculated as follows: 3.14 (average family size per 2010 Census) x 1,417 (population under 18 years) per 2010 Census / 8,234 (total population per 2010 Census) x 252 (new housing units).

4. PARKS AND RECREATION

This subsection provides an analysis of the Project's effect on the existing recreational resources within the Town of Mammoth Lakes. Information regarding existing parks and recreational facilities that would serve the Project was provided in part by the Mammoth Lakes Recreation Department.¹⁹

a. Environmental Setting

(1) Regulatory Framework

Inyo National Forest Land and Resource Management Plan

The Inyo National Forest Land and Resource Management Plan (LRMP) prescribes management direction for the multiple use and sustained yield of public benefits for the Inyo National Forest. According to the LRMP, recreation is the most significant resource on the Inyo National Forest, and the Forest is expected to continue providing recreational opportunities for the foreseeable future. The LRMP states that the economic stability of all Eastern Sierra communities rests heavily on recreation-based income and that most of the major attractions that bring recreationists to the area are located on Inyo National Forest land.

According to the LRMP, on lands with potential for both recreation and other resources, current practice usually emphasizes recreational values. The LRMP further states that an opportunity exists in which it can be decided which areas will be managed for varying recreational opportunities, how those opportunities will be enhanced, and what types of resource management are consistent with a recreation emphasis. According to the LRMP, the demand for recreation in the Mammoth Lakes area is heavily tied to the population of Southern California. The LRMP expects demand to exceed the existing capacity of many USFS recreational facilities and that the current emphasis on destination-oriented camping in the Forest will continue. LRMP recreational policies are as follows:

- Construct and maintain facilities and sites to regional standards.
- Construct and maintain sites and associated water systems and wastewater treatment plants to Facility Condition Class 1 as defined in the recreation resource inventory.
- Emphasize permitted activities rather than prohibited ones on signs to lessen recreation use conflicts.
- Provide screening and shade, using vegetation and/or artificial structures, to increase use on less attractive sites.
- Develop new campsites in concentrated recreation areas before other locations to generate increased use and higher return to the U.S. Treasury.
- Develop associated day-use facilities and interpretive and informational sites and trails, together with overnight campgrounds, to achieve a balanced facility package.

The Project Area includes Management Area No.8, the Mammoth Escarpment, and Management Area No. 9, Mammoth. Management Area No. 8 incorporates Mammoth Lakes Basin and Management Area No. 9

¹⁹ *Stuart Brown, Recreation Manager & Public Information Officer, Town of Mammoth Lakes, Personal communication, September 11, 2015.*

contains private land within the Town of Mammoth Lakes and USFS land adjacent to the Town, to the east of Lake Mary Road. The LRMP sets forth policies for the management of recreational resources in the designated Management Areas. Recreational resources prescriptions/policies that are applicable to Management Area No.8, a designated Concentrated Recreation Area, include the following:

- Develop recreation campsite plans to inventory, coordinate and program the full summer and winter recreation development potential in the area in Prescription No.12 (Lakes Basin).
- Identify and program dispersed trail facilities in the areas in the Lakes Basin.
- Include hiking and equestrian trail opportunities in all areas and bicycle trails in the Lakes Basin. Include opportunities for mountain bike trails within the Management Area.
- Interface trail systems with the community.
- Maintain levels of reservoirs in Mammoth Lakes Basin to desirable levels for recreation use and scenic enhancement during the entire summer use season.
- Emphasize day-use activities within the Mammoth Lakes Basin by developing needed day-use facilities to complement overnight campgrounds.
- Limit resort capacity in the Mammoth Lakes Basin to 10 percent above 1985 levels. Emphasize development of front county trails, particularly those linking Mammoth to the Forest.
- Maintain current use patterns and open space on National Forest Service System lands adjacent to Valentine Reserve.

Recreational policies related to Management Area No. 9 include the following:

- Provide trail interface opportunities with the community of Mammoth Lakes.
- Maintain open space access adjacent to the Town of Mammoth Lakes for passive recreation use.
- Prohibit dispersed camping throughout the Management Area.
- Prohibit development of Shady Rest beyond existing perimeter roads and north of the power line right-of-way.
- Allow development of Mammoth Creek Park by the Town of Mammoth Lakes.
- Identify and program the expansion potential of the Shady Rest and Sherwin Creek Campground complexes and develop as funds become available.
- Fully develop the interpretive potential of Hot Creek geologic site as funds become available.

State of California

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreation facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons

residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit.

Town of Mammoth Lakes

2007 General Plan

The Parks, Open Space and Recreation Element of the General Plan recognizes the importance of parks, open space and recreational opportunities as they create an attractive quality of life and contribute to public health by encouraging physical activity and an appreciation of nature. Goals and policies within the Parks, Open Space and Recreation Element emphasize the creation and maintenance of a wide variety of outdoor winter and summer activities for residents and visitors.

Parks and Recreation Master Plan

Adopted February 1, 2012, the Town of Mammoth Lakes Parks and Recreation Master Plan (PRMP) assess the Town's recreation needs for the future and establishes goals and policies that guide park improvements. The PRMP directly implements the following action stated in the Town's 2007 General Plan: "Develop a comprehensive and integrated year-round Parks and Recreation Master Plan." In addition, goals and policies presented in the PRMP are intended to support other General Plan goals, especially those related to Mobility, Economy, and Community Design. The PRMP contains an analysis of the supply, demand, and needs for park and recreation facilities and services within the Town of Mammoth Lakes, and includes a comprehensive assessment of public and private facilities available in and around Mammoth Lakes. The PRMP also recommends implementation strategies to help meet the challenges of providing parks and recreation facilities.

Trail System Master Plan

The Trails System Master Plan (TSMP) adopted on October 19, 2011, envisions an integrated system of infrastructure and programs that support recreation and mobility simultaneously, by seamlessly connecting homes, hotels, businesses, recreation nodes, and backcountry experiences. The TSMP includes a strong focus on providing facilities that will improve access to trails from all modes of transportation. The TSMP also includes suggestions for other improvements such as sidewalks, crosswalks, bus stops, bike lanes, bicycle parking, summer maintenance, and snow removal.

Objectives of the TSMP include (i) identifying necessary improvements relative to pedestrian safety, convenience and comfort; (ii) updating the General Bikeway Plan and developing an on-street bikeway network that enhances bicyclist safety, convenience and comfort; (iii) ensuring that pedestrians and bicyclists can access the public transit system safely, conveniently and comfortably; and that public transit serves all key recreation nodes; and (iv) providing the information necessary for residents and visitors to navigate. The TSMP also supports pedestrian-oriented development and 10-foot sidewalks along Main Street, and recommends bike lanes in Main Street as an interim solution for closing a gap in the primary paved path system. General recommendations include a minimum sidewalk-to-major roadway ratio of 1.6 to 1 to be achieved by including sidewalks on both sides of all arterials and on one side of all collector streets. Mid-block pedestrian connectors would be considered in high pedestrian activity areas. The TSMP also includes a bike route plan and a bicycle parking component and addresses signage and wayfinding for multi-use paths, bike lanes, bike routes, pedestrian facilities, soft-surface trails, and easements. A goal of the TSMP

is to develop a year-round maintenance plan, to prioritize snow removal on paved paths and sidewalks, to preserve pavement markings, and to coordinate between roadway and sidewalk snow removal.

Municipal Code

Section 15.16.080 Article II, Development Impact Mitigation Fees, of the Town of Mammoth Lakes Municipal Code establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.081.B, establishes a development impact fee (DIF) program to fund new park land, park improvements and recreation facilities. Section 15.16.080 also provides that DIF and other fees are to be regularly reviewed and updated to ensure that they are accurate and fair. Currently, the DIF for parks and recreation is \$680 per single-family home, \$579 per mobile home, \$711 per unit for each multi-family unit, and \$508 per room for lodging uses.

Measure R

The Mammoth Lakes Recreation, Trails and Parks Investment Initiative Ordinance also known as Measure R, was adopted by the Mammoth Lakes Town Council on February 20, 2008 and approved by the voters of the Town Mammoth Lakes on June 3, 2008. Measure R imposes a Transactions and Use Tax in the amount of one-half percent for the purpose of funding Recreation, Trails and Parks. Measure R specifically designates the use of funds for planning, construction, operation, maintenance, programming and administration of all trails, parks and recreation facilities managed by the Town of Mammoth Lakes without supplanting existing parks and recreation facility maintenance funds. Funding recommendations for the effective use of Measure R funds for Town Council consideration is conducted by Mammoth Lakes Recreation (MLR).

Measure U

The Mammoth Lakes Mobility, Recreation and Arts & Culture Utility Users Tax Ordinance, also known as Measure U was adopted by the Mammoth Lakes Town Council on March 17, 2010, and approved by the voters of the Town of Mammoth Lakes on June 8, 2010. Funds are used to support Mobility, Recreation and Arts and Cultural programs and facilities. Funding recommendations for the effective use of Measure U funds for Town Council consideration is conducted by Mammoth Lakes Recreation (MLR).

(2) Existing Conditions

The Mammoth Lakes region is known for its broad range of recreational resources, including such amenities as the Mammoth Mountain Ski Area (MMSA), Mammoth Lakes Basin, Devils Postpile National Monument, Red's Meadow, Inyo National Forest, and the John Muir and Ansel Adams Wilderness Areas. Downhill skiing, cross-country skiing, snowboarding, and snowmobiling are the focus of winter recreation in the area. MMSA includes Mammoth Mountain, Tamarack Cross-Country Ski Center at Twin Lakes, Scenic Gondola Rides, and Snowmobile Adventures. Summer recreation is dispersed throughout the Town with trout fishing in the area's streams and lakes, hiking, mountain biking, camping, sight-seeing, horseback riding, non-motor boating, motor-boating (Lake Mary), golf, and birding, among popular outdoor activities.

The United States Forest Service (USFS) administers most of the land outside the Town's urban growth boundary. The USFS operates several recreational areas and campgrounds near the Town of Mammoth Lakes including the Sherwin Creek Campground, the Lake Mary Campground, Coldwater Campground, and the Pine City Campground. **Table 4.10-4, Parks and Recreational Facilities within Mammoth Lakes**, lists the parks and recreation facilities that the Town owns and/or operates. As indicated in Table 4.10-4, the Shady Rest Park and Mammoth Creek Park East and a portion of Mammoth Creek Park West (4.7 acres) are located

on USFS land and are operated by the Town under a USFS Special Use Permit. The Sherwins Area is located on National Forest lands within the Town's Planning Area, but outside the Municipal Boundary. Whitmore Recreation Area is operated by the Town, with a maintenance agreement with Mono County on land leased from the Los Angeles Department of Water and Power.

Table 4.10- 4

Parks and Recreational Facilities within Mammoth Lakes

Name	Size (Developed/Total size)	Description
Mammoth Creek Park (East and West)	3.5 acres of 9 acres (east) 2.0 acres of 11.4 acres (west)	Located off Old Mammoth Road near Meridian Boulevard; includes the Hayden Cabin museum, picnic tables, restroom facilities, playground, play area for toddlers and children, art sculpture, walking and biking trails, and paved parking; includes trailheads for paved MUPs that connect to the Town's Main Path. Mammoth Creek West is 9.6 acres (4.9 owned by Town, 4.7 leased from USFS; Mammoth Park East is 9 acres and is located on National Forest land and is operated by the Town under a USFS Special Use Permit.
Shady Rest Park	12.52 acres of 12.52 acres	Located on Sawmill Cutoff Road to the north of SR-203; Includes 2 soccer fields, 3 softball fields, skate park, 2 sand volleyball courts, picnic areas, a play area, restrooms, concession stand, and paved parking. Located on National Forest land and operated by the Town under a USFS Special Use Permit.
Community Center Park	5.18 acres of 5.18 acres	Located at 1000 Forest Trail; includes Community Center, library, children's play area, six tennis courts, picnic tables, walking paths, restrooms, and paved parking. The Community Center includes a kitchen, stages, and other facilities and is primarily used for public meetings including Town Council meetings.
Whitmore Park	12 acres of 32.6 acres	Located along US 395 at Benton Crossing; contains a new 9-lane all weather running track and regulation synthetic soccer/football field; 3 baseball/softball diamonds, restrooms, picnic facilities, Whitmore community swimming pool (open May through September), and paved parking; operated by the Town with a maintenance agreement with Mono County on land leased from the Los Angeles Department of Water and Power.
Trails End Park	2.5 acres of 4.11 acres	Located along Meridian Boulevard south of Commerce Drive; includes the 40,000 square-foot Volcom Brothers Skateboard, parking, and restroom facilities.
Mammoth Ice Rink	n/a	Located at 416 Sierra Park; owned and operated by the Town through a partnership with the Mammoth Unified School District and Mono County Office of Education. Offers public skating sessions, pick-up hockey, lessons and special events.
Mammoth RecZone	n/a	Outdoor 17,000 sq. ft. venue offering summer recreational roller/inline skating, youth and adult roller hockey, broomball, basketball, access to mini-ramps, table tennis/golf, bean bag toss, and horseshoe pits. The facility operates from June to September and includes outdoor lighting, restrooms, parking, and concessions.
Total	37.5 acres of 74.9 acres ^a	

^a 25.7 acres of developed parkland and 42.26 acres of undeveloped parkland, excluding Whitmore Park, a regional park.

Source: Town of Mammoth Lakes Parks and Recreation Master Plan, Adopted February 1, 2012 and the Town of Mammoth Lakes Parks and Recreation Department website: <http://www.ci.mammoth-lakes.ca.us/index.aspx?nid=259>; Town of Mammoth Lakes, May 2016.

The total amount of parkland in the Town is approximately 75 acres, of which approximately 37.5 acres is developed parkland.²⁰ As Whitmore Park is considered a regional park, the total amount of local parkland, which excludes Whitmore Park, is approximately 42 acres (26 acres of developed parkland).²¹ The total amount of regional parkland (Whitmore Park) in the Town is 32 acres (12 acres of developed parkland).²²

The Town also operates the outdoor Mammoth Ice Rink through a partnership with the Mammoth Unified School District and Mono County Office of Education. The Mammoth Ice Rink offers skating sessions, ice hockey programs, ice skating programs and special events. The Ice Rink is open from November through February, weather permitting. In 2015/16, the Mammoth Ice Rink had 5,462 visitors.²³ The Town also operates the RecZone, a multi-use facility that includes an outdoor roller rink. The Mammoth RecZone had 853 visitors in 2015.²⁴ According to the Parks and Recreation Department staff, with the exception of the Mammoth Ice Rink and Mammoth RecZone it is difficult to track the amount of visitors to parks facilities; therefore there are no statistics on park usage for the Town. However, staff indicates that certain park facilities such as tennis courts and ballfields have switched to greater year-round use as milder and shorter winter seasons in recent years has increased demands on facilities that traditionally were only open from May through September. Parks and Recreation staff have begun to open these facilities earlier and close them later in the year in response to demand, which places more demand on staffing resources. In addition, the Whitmore Track and Sports Field constructed in 2012, features an all-weather, 9-lane polyurethane running track, with a full-size synthetic turf infield. The facility typically operates from April 1 to November 1 each year (weather permitting) between sunrise and sunset. It was constructed as a public/private partnership between the Town and the newly expanded Mammoth Track Club. Phase II of the facility will include the construction of a sports building (locker/concession/storage), paved parking lot, field lighting, a decomposed granite path with fitness stations around the track, an open-air picnic pavilion and an entry sign.

Mammoth Lakes Recreation (MLR) is a non-profit organization, public benefit corporation, formed in June 2014. Mammoth Lakes Recreation was created to enhance and create premier recreational and cultural opportunities, facilities, and programming for Mammoth Lakes. Mammoth Lakes Recreation has a similar organizational structure as Mammoth Lakes Tourism, Mammoth Lakes Housing, and the Eastern Sierra Transit Authority (ESTA) which work with the Town to provide community services.

Level of Service Standards

Per the PRMP recommendations, the Town has adopted a level of service (LOS) standard of 5 acres of parks per 1,000 residents. For regional park acreage, the LOS standard is 2.5 acres per 1,000 residents. In addition to park acreage, the PRMP also recommends that the Town preserve public access to public lands around Mammoth Lakes. While this open space is considered essential to community recreation it does not count towards the parkland LOS.

²⁰ *Town of Mammoth Lakes Parks and Recreation Master Plan, Adopted February 1, 2012.*

²¹ *Town of Mammoth Lakes Parks and Recreation Master Plan, Adopted February 1, 2012.*

²² *Ibid*

²³ *Stuart Brown, Recreation Manager & Public Information Officer, Town of Mammoth Lakes, May 19, 2016.*

²⁴ *Ibid*

The current LOS in the Town is 3.12 acres of developed local parkland per 1,000 residents and 5.13 acres undeveloped parkland per 1,000 residents.²⁵ For regional parkland, the LOS is currently 1.46 acres of developed parkland per 1,000 residents and 3.96 acres of undeveloped parkland per 1,000 residents. This is below the PRMP goals for LOS for developed parkland, but is above the LOS standard for undeveloped parkland.

Future Facilities

The PRMP provides a vision for developing parks and recreation facilities in the Town through the year 2025. The PRMP includes a number of components that are intended to establish the framework for making informed future decisions regarding the provision of parks and recreation facilities while avoiding or reducing impacts to the physical environment.

New facilities identified in the PRMP are intended to provide expanded and year-round recreation opportunities and to meet anticipated LOS increases with future population growth. The PRMP includes the following eight recommendations for new parks and recreation facilities. These are provided in alphabetical order, and are not prioritized:

1. Additional Parkland. The Town should acquire and/or develop more park acreage to meet future LOS needs as the population grows. The estimated area needed by 2025 is an additional 13.88 acres of developable land in Town for active recreation. In addition, most of the existing undeveloped park acreage (local and regional) will need to be developed to provide more recreation capacity and amenities. While no specific properties or sites are identified for acquisition as parkland, the PRMP notes that the expansion of parkland can occur by: adding to existing parks; developing new parks on land owned or acquired by the Town; having new development provide parks; and acquiring and/or improving additional acreage near Town to meet regional parkland needs.
2. Aquatic Center. The PRMP recommends developing an in-Town indoor year-round aquatic center. Such a facility may be a joint use facility developed with other partner agencies or, in the short term enclosure of the existing Whitmore outdoor pool to allow for year-round use. This facility is being researched by Mammoth Lakes Recreation.
3. Dog Parks. Current Town Municipal Code (Sections 6.12.210 and 12.20.340) requires that dogs must be kept on a leash in public parks and other public areas within Town limits. Mammoth Lakes' residents have expressed a need for off-leash dog areas, or dog parks, in Town. The PRMP recommends the provision of a dog park immediately in Town to help meet this current recreation need, and potentially a second dog park to meet LOS demands by 2025.
4. Event and Performance Venues. The PRMP suggests that new event venues, including venue(s) that can accommodate large crowds (several thousand), in different contexts should be provided. For example, an urban site could host smaller, frequent events that would benefit from easy in-Town access. Alternatively, a nature site could accommodate events that could capitalize on the Town's unique setting. Both indoor and outdoor venues should be provided. No specific sites are identified for future venues. This facility is being researched by Mammoth Lakes Recreation.

²⁵ *Town of Mammoth Lakes Parks and Recreation Master Plan, Adopted February 1, 2012 and discussion with Stuart Brown, Recreation Manager & Public Information Officer, Town of Mammoth Lakes May 2016.*

5. Picnic Areas. The PRMP recommends adding up to six more picnic shelters and 26 more picnic tables by 2025. Ideally, at least one shelter should be available within each park, to better distribute the supply of picnic areas throughout Town.
6. Multi-Use Recreational/Cultural Facility. The PRMP suggests that construction of a multi-use recreational facility is needed to accommodate indoor recreation and programs (i.e., indoor sports courts/fields, children's play area; sports training, running track, etc.). Such a facility could maintain year-round levels of service by providing indoor amenities for winter and evening use, when outdoor facilities are unavailable. Similar to the aquatic center, no specific site has been identified for such a facility, and no design or other more detailed proposal advanced at this time. Town Council directed staff to plan, design and construct community multi-use facilities at Mammoth Creek Park West. See PLAN Your PARK below.
7. Snow and Winter Play Areas. The PRMP recommends that opportunities for year-round play be provided by indoor or other sheltered play areas and outdoor places for winter play in the snow. Indoor play areas may be accommodated in a new multi-use recreational/cultural facility and possibly the old library building. While the PRMP does not make specific proposals for the location of winter snow play areas, it mentions a number of possible sites such as Trails End Park, Shady Rest Park, and the knoll near the Snowcreek VIII-area gravel pit, and near Scenic Loop Road where existing informal snow play occurs.
8. Sports Fields and Courts. The PRMP identifies an immediate need for a multipurpose field that can be used for soccer, as well as a facility for indoor soccer games. Looking toward the future, additional soccer fields, tennis courts, and ball fields will be needed to meet 2025 LOS standards. It should be noted that the proposed Whitmore Track project, currently under review, includes a synthetic turf infield that can accommodate soccer and football.

Building on the recommendations provided in the PRMP, on August 6, 2014 the community driven, 'PLAN Your PARKS' process recommendations were presented to Town Council. The 'PLAN Your PARKS' recommendations included a list of short-term projects that could be implemented in one to three years and conceptual designs of four park sites which included the Whitmore Recreation Area, Mammoth Creek Park East and West, the Community Center, Park and Tennis Courts and the Bell Shaped Parcel. Among the four parks, Mammoth Creek Park West was also the preferred location of development of a new Recreation/Community Center and Aquatic facility. Future development would be based on further analysis, necessary environmental action, and applicable Town Council direction. This planning effort, now called PLAN Your PARK continued late in 2015 and early in 2016 with Council direction to plan, design and construct Community Multi-Use Facilities at Mammoth Creek Park West (Town property). The project includes three major components: a multi-use facility, complementary community center, and a playground with accessible components. The anticipated opening date of the Multi-use Facility is October 2017.

In addition to park acreage, the PRMP also recommends that the Town preserve public access to public lands around Mammoth Lakes. The surrounding public lands are considered essential to community recreation but do not count towards the parkland LOS.

Level of Service Standards

To achieve the recommended LOS for parks and recreation facilities by 2025, the PRMP estimates that an additional 27.67 acres of developed local parks would be needed for a total of 56.14 acres. As proposed in

the PRMP, this increase in parkland could be achieved through acquisition of an additional 13.88 acres for local parks by 2025, assuming that all of the existing undeveloped local parkland is developed. In addition, 18.07 more acres of developed regional parkland should be available to Town residents by 2025 (for a total of 28.07 acres). The PRMP estimates that the 32.64-acre lease area at Whitmore Park, which includes both the Whitmore Pool lease area of approximately 8.9 acres, and the Whitmore Park/Ballfields lease area of approximately 23.75 acres, would be large enough to bring the Town into conformance with PRMP and LOS goals for the ratio of parkland to population. Since preparation of the PRMP, an additional two acres of parkland was developed at Whitmore Park which includes the new Whitmore Track and Sports Field. Because the recommended parks and recreation maintenance and improvements identified in the PRMP are costly, a long-term schedule for implementation is identified in the PRMP. The PRMP recommends a phasing plan for upgrades and new projects to allow the Town to gradually increase its inventory of parks and recreation facilities, thereby keeping pace with LOS recommendations as the population increases.

b. Methodology and Thresholds

(1) Methodology

The analysis of impacts on parks and recreation addresses the potential increase in population in the commercial districts and the Town as a whole resulting from the removal of the density cap as a result of the Land Use Element/Zoning Code Amendments and the ability of the Mammoth Lakes Parks and Recreation Department and Mammoth Lakes Recreation to adequately serve the existing and future population in the Project area.

The analysis reviews the Project's goals, policies, and implementation measures to reduce the potential effects of the increase in population resulting from the Land Use Element/Zoning Code Amendments on the need for parks and recreation. Based on consultation with the Mammoth Lakes Parks and Recreation Department, a determination was made as to whether existing park and recreational facilities could accommodate the additional demand for services resulting from the Land Use Element/Zoning Code Amendments without the need for a new facility or the alteration of existing facilities.

(2) Thresholds

For purposes of this EIR, the Town has utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether a project would have a significant environmental impact regarding aesthetics. The Land Use Element/Zoning Code Amendments would result in a significant impact if;

- PRK-1** The Project would generate a demand for park and recreation facilities that would require the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

- PRK-2** The Project would 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.

(3) Applicable General Plan Goals/Policies and Adopted Mitigation Measures

There are no mitigation measures in the adopted Mitigation Monitoring and Reporting Program associated with the 2007 General Plan regarding parks and recreation. The 2007 General Plan includes numerous goals, and policies to support and improve public safety and emergency services. The following General Plan Parks, Open Space and Recreation Element goals, policies, and actions are applicable to park and recreation services:

A Town Within a Park

Goal P.1: Maintain parks and open space within and adjacent to town for outdoor recreation and contemplation.

Goal P.2: Provide additional parks within town.

- **Policy P.2.A:** Coordinate open space programs and policies with the Inyo National Forest, City of Los Angeles and Mono County.
- **Policy P.2.B:** Require usable public recreation open space in all master planned developments.
- **Policy P.2.C:** Maximize parks and open space through flexible form-based zoning, development clustering and transfers of development rights within individual districts.
- **Policy P.2.D:** Increase understanding and appreciation of the cultural, natural and historical resources of the region and town through development of programs, facilities and interpretive signage.
- **Policy P.2.E:** Include interpretive signage in parks, trails and public rights-of-way.

Recreational Opportunities

Goal P.4: Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.

- **Policy P.4.A.:** Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.
- **Policy P.4.B:** Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors. Activities include but are not limited to:
 - Downhill skiing & snowboarding
 - Day & backcountry hiking
 - Cross-country skiing
 - Walking
 - Back-country skiing & snowboarding
 - Interpretive trails & signage
 - Snowshoeing
 - Fishing
 - Sleigh rides
 - Fall-color viewing
 - Tennis
 - Birding
 - Swimming
 - Health & fitness

- Climbing
 - Sledding
 - Touring
 - Dog sledding
 - Street & mountain biking
 - Ice skating
 - Camping
 - Snowmobiling
 - Soccer
 - Off-highway vehicles
 - Racquetball
 - Equestrian activities
 - Snow play
 - BMX
 - Skateboarding
- **Policy P.4.C:** Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.

Connected Throughout

Goal P.5: Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes.

- **Policy P.5.A:** Create open space corridors by combining open space on neighboring properties.
- **Policy P.5.B:** Design and construct trails as components of a regional and local network for recreation and commuting.
- **Policy P.5.C:** Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.
- **Policy P.5.D:** Design public and private streets not only as connections to different neighborhood districts but also as an essential element of the open space system. Include parks and plazas, treelined open spaces and continuous recreational paths in design.
- **Policy P.5.E:** Design parks and open space to be accessible and usable except when set aside for preservation of natural resources, health and safety.
- **Policy P.5:** Ensure provision of parkland dedications or payment of in-lieu fees through project approvals or development impact fees.
- **Policy P.5.G:** Identify, zone and procure land for new and expanded parklands including:
 - pocket parks
 - natural pockets of forest
 - community gardens
 - greenbelts
 - streamside parks
 - street way linear parks
 - active parks
 - open space
 - snow play
 - festival and special events areas

- passive parks
 - **Policy P.5.H:** Dedicated parkland suitable for active recreation uses shall have a maximum slope of 10%, be accessible to the community, and be free of significant constraints.

c. Environmental Impacts

Threshold PRK-1: The project would result in a significant impact if the project would generate a demand for park and recreation facilities that would require the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

Threshold PRK-2: The project would result in a significant impact if the project would 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.

Impact Statement PRK-1: *The Land Use Element/Zoning Code Amendments could result in an increase in the population in the commercially designated areas which could potentially increase the demand for existing neighborhood/regional parks and other recreational facilities. The potential increase in population could also require the expansion of new recreational facilities. This impact would be significant and unavoidable.*

Future development within commercially designated areas along Main Street and Old Mammoth Road would be infill development and would not involve the creation or development of new parkland. As described in Chapter 2, Project Description, of this EIR, the proposed removal of the density cap would accommodate greater residential and hotel densities within the Main Street and Old Mammoth Road neighborhoods and, thus, could introduce more people to these areas. The proposed amendments would not alter the other development standards prescribed in the Town of Mammoth Municipal Code. These changes could increase the estimated potential development by 336 residential units, up to 467 hotel rooms, and approximately 152,533 additional square feet of commercial floor area. As discussed in Section 4.9, *Population and Housing*, of this EIR, the population that could be accommodated by such development could be up to 1,978 people including visitors and permanent residents. Such an increase in population could result in an increase in demand for parks and recreation services.

The proposed Land Use Element Amendments also include the removal of the PAOT which represents the total peak population of permanent and seasonal residents and visitors. The proposed amendment would replace PAOT with the use of PIEC to evaluate development. While the Town is removing the density cap and prior approach to regulating overall development, analysis would still be done to evaluate the potential impacts of new development. Specifically under the PIEC, the evaluation of future projects includes the following evaluation measurements for open space, recreation and parks.

Open Space:

- Measurement R1) Project contributes open space according to established ratios;
- Measurement R2) Project provides useable and needed open space, i.e. TOT lot, dog park, etc.

Recreation and Entertainment:

- Measurement R3) Project provides/encourages outdoor/indoor recreation options that are accessible/affordable;
- Measurement R4) Project provides trail, pedestrian, bike, or transit connections and access to support recreation;
- Measurement R5) Project provides public access to public lands; and
- Measurement R) Project provides entertainment options that are accessible/affordable.

This impacts-based approach is intended to help ensure that growth in the Town would not exceed the carrying capacity of parks and recreational services and that the potential for significant environmental impacts would be identified and mitigated if necessary, to the extent feasible.

As discussed previously, new development would be subject to the applicable DIF for parkland and recreation at the time of issuance of a permit. Future residents and visitors would be subject to the Measure R Transactions and Use Tax adopted for the purpose of funding Recreation, Trails and Parks and the Measure U Mobility, Recreation and Arts & Culture Utility Users Tax that was adopted to support Mobility, Recreation and Arts and Cultural programs and facilities.

Per the PRMP recommendations, the Town has adopted a LOS standard of 5 acres of parks per 1,000 residents. As stated earlier, the current LOS in the Town is 3.12 acres of developed local parkland per 1,000 residents and 5.13 acres undeveloped parkland per 1,000 residents.²⁶ For regional parkland, the LOS is currently 1.46 acres of developed parkland per 1,000 residents and 3.96 acres of undeveloped parkland per 1,000 residents. This is below the PRMP goals for LOS for developed parkland, but is above the LOS standard for undeveloped parkland.

The PRMP anticipated that part of the shortfall of developed parkland in the Town could be accommodated by the development of future facilities at the regional Whitmore Park. Since the adoption of the PRMP, the Whitmore Track and Sports Field has been constructed and Phase II of the facility would include the construction of a sports building (locker/concession/storage), paved parking lot, field lighting, a granite path with fitness stations, an open-air picnic pavilion. With these additional improvements the amount of regional developed park in the Town has recently increased to by two acres to a total of 12 acres. In addition, the Town is in the process of implementing new park development and facilities in the near term. As described above, the PLAN Your PARKS' recommendations that were recently presented to Town Council included a list of short-term projects that could be implemented in one to three years and conceptual designs of four park sites which included the Whitmore Recreation Area, Mammoth Creek Park East and West, the Community Center, Park and Tennis Courts and the Bell Shaped Parcel. Among the four parks, Mammoth Creek Park West was also the preferred location of development of a new Recreation/Community Center and Aquatic facility. As discussed in Section 4.9, *Population and Housing*, the projected 1,978 new people beyond that projected under the existing General Plan buildout that could occur in the C-1 and C-2 areas with the 2.0 FAR assumes 100 percent occupancy of rental units (fractional units, time shares, rentals, and lodging). Currently, due to the large supply of visitor dwelling units available in the Town, recorded vacancy rates are

²⁶ *Town of Mammoth Lakes Parks and Recreation Master Plan, Adopted February 1, 2012 and discussion with Stuart Brown, Recreation Manager & Public Information Officer, Town of Mammoth Lakes May 2016.*

high. The 2010 Census identified approximately 66.5 percent of the current housing stock as vacant. By comparison, the 2010 Census showed that the entire state of California had a vacancy rate of 8.1 percent. Furthermore, the Town of Mammoth is surrounded by a broad range of open space, parkland and recreation areas that are not included in the estimate of local and regional parkland provided in Table 4.10-4. These areas include amenities such as Mammoth Lakes Basin, Devils Postpile National Monument, Red's Meadow, Inyo National Forest, and the John Muir and Ansel Adams Wilderness Areas. In addition, the MMSA includes ski, snowmobile, hiking, sightseeing and biking opportunities at Mammoth Mountain, Tamarack Cross-Country Ski Center at Twin Lakes, Scenic Gondola Rides, and Snowmobile Adventures. As such, it is likely that new residents and visitors would utilize the range of recreational areas and parkland that surround the Town and would not concentrate park and recreation usage to only local and regional parks and recreational facilities that are listed in Table 4.10-4. In addition, the payment of fees would fund a fair share for construction of future parks to support the Town's PPRP and LOS standard.

However, even in light recent improvements to Whitmore Park, new planned park and recreational facilities, access to other parks and recreational amenities, and funding associated with the DIF program, and Measure R and U, implementation of the Project would increase the demand for parks and recreational services. As the Town is currently below the LOS goal of 5 acres of parks per 1,000 residents for developed parkland, and as the Project would further increase demand for parks and recreational facilities and would exacerbate impacts to parks and recreational facilities, impacts to parks and recreation facilities are considered significant and unavoidable.

Mitigation Measures

No mitigation measures beyond the policies and/or implementation measures identified in the 2007 General Plan, PIEC evaluation, or the DIF, Measure R or U fee programs are feasible.

Level of Significance After Mitigation

Due to the projected increase in demand, impacts to existing parks and recreation due to increased use of existing parks and facilities would be significant and unavoidable.

d. Cumulative Impacts

The analysis of the impact of the Land Use Element/Zoning Code Amendments on park and recreational facilities is cumulative in nature because it evaluates the effects of the Land Use Element/Zoning Code Amendments in combination with the General Plan buildout. Any future projects would be required to pay the required parkland and recreation DIF, and taxes associated with Measure R and U. Individual development projects would also be subject to review under CEQA, which includes an analysis of park, open space and recreation inclusive of their cumulative effects in concert with other development projects. However, as cumulative projects would also increase the demand for parks and recreational services, further exacerbating impacts to parks and recreational facilities. As the Project would result in significant and unavoidable impacts on parks and recreational facilities, cumulative impacts would also be significant and unavoidable.

5. LIBRARY SERVICES

This subsection addresses potential impacts on library services that could occur as a result of the proposed Land Use Element/Zoning Code Amendments. Library services in the Town are provided by the Mono County Library System. The analysis focuses on the Mono County Library System facilities that currently serve the Town and the ability of the Mono County Library System to provide library services with the implementation of the Land Use Element/Zoning Code Amendments. The analysis is based in part on information provided by Mono County Library System.

a. Environmental Setting

(1) Regulatory Framework

Mono County Library System

The Mono County Library System was established in 1965 as a joint school-community library system and is operated by the Mono County Office of Education under the direction of the Mono County Superintendent of Schools. The Mono County Library System is comprised of seven library branches serving different communities in Mono County (Benton, Bridgeport, Coleville, Crowley Lake, June Lake, Lee Vining, and Mammoth Lakes). The Mammoth Lakes Branch also serves as the Mono County Library System's administrative offices. The Mono County Library System receives the majority of its funding from a 1.68 percent property tax allocation, which is collected by Mono County. The Mono County Library System operates under the following Mission Statement and Policy:

The Mono County Library enhances lives and strengthens our communities by providing free access to information, technology, life-long learning opportunities, social interactions, and cultural enrichment.

- The library advocates that all reading is good reading
- The library enables people to set and meet individual reading goals
- The library connects people with a rich and diverse collection of reading materials in a variety of formats
- The library offers activities that extend the reading experience
- The library is responsive to the diverse cultures and languages represented in the community
- All staff contribute to the success of the library
- Staff engage community partners to enrich program offerings and increase the visibility, credibility, and reach of the library's efforts
- The library offers opportunities for people of all ages to get involved in activities that improve the community.
 - **Policy:** The Mono County Library System upholds the principles of intellectual freedom and the public's right to know by providing people of all ages with access to material that reflects a diversity of points of view. The library system affirms its support of the basic library polices defined in the American Library Association's Library Bill of Rights, Freedom to Read Statement, and Libraries: an American Value.

Town of Mammoth Lakes

General Plan

The Public Health and Safety Element of the 2007 General Plan aims to improve the quality of life for those living and working in the Town. The intent of the Public Health and Safety Element is to support, provide and encourage facilities and services that are important to a livable and safe community. Goals and policies related to library services within the Public Health and Safety Element support educational and community programs and facilities.

Municipal Code

Section 15.16.080 Article II, Development Impact Mitigation Fees of the Town of Mammoth Lakes Municipal Code establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.081.B establishes a development impact fee (DIF) for the library facilities in the Town. The Town collects the library DIF on behalf of Mono County Office of Education.

The development impact fee for library services is currently \$2,001 for single-family homes (non-transient); \$340 for single-family homes (transient); \$1,721 for mobile homes; \$1,721 for multi-family homes (non-transient); and \$340 for multi-family homes (transient).²⁷ Commercial, office, and industrial uses are not subject to the library DIF. The library DIF is currently used to pay the remainder of the loan for the construction of Mammoth Lakes Branch Library facility that was developed in 2007.²⁸

(2) Existing Conditions

Library services in the Town are provided by the Mono County Library System. The Mammoth Lakes Library Branch, which is located at 400 Sierra Park Road, is approximately 17,000 square feet in size. The Mammoth Lakes Library was constructed in 2007 and was a substantial expansion from the previous library facility, which was approximately 7,000 square feet. The old library was located at 960 Forest Trail.

The existing Mammoth Lakes Library Branch features a large and a small conference room, 20 public computers, free Wi-Fi, a children's area, a community arts and craft area, a teen area, law library area, and a shared classroom area with the Cerro Coso Community College. The library collection contains 40,000 volumes which include books, audio books, CDs, and DVDs.²⁹ The collection also includes Spanish language materials and educational materials and volumes associated with the Cerro Coso Community College, which does not have its own library collection or facilities and is housed entirely at the Mammoth Lakes Library Branch.

In 2014 the Mammoth Lakes Library Branch served a population of approximately 85,000 persons. This includes residents of the Town, residents of Mono County, as well as visitors to the area. The Mammoth Lakes Library Branch includes five (5) full time equivalency staff, including the custodian. The Mammoth

²⁷ *Development Impact Fee Schedule, Town of Mammoth Lakes Building Division, Adopted by Town Council July 1, 2015.*

²⁸ *Telephone interview with Ana Danielson, Mono County Library Director, September 3, 2015.*

²⁹ *<http://www.monocolibraries.org/branches/mammoth-lakes>, Accessed September 16, 2015.*

Lakes Branch also serves as as the Mono County Library System’s administrative offices. The Mono County Library director works primarily out of the Mammoth Library Branch.³⁰

The Mono County Library system is a collaborative library system whereby library materials are accessible to order at no charge from other branches within the Mono County Library System as well as other libraries throughout California. The Mono County Library System also uses ‘Zip Books’, a project funded by the California State Library through a grant from Library Services and Technology Act (LSTA). Under this program, a librarian may order a book or audiobook from Amazon for a patron that isn’t currently part of the library’s collection. The book or audiobook arrives directly to the patron’s home at no charge. When the patron is finished with the item, it is returned it to the library branch and is added to the library collection. A ‘Zip Book’ item value is limited to \$35.³¹

b. Methodology and Thresholds

(1) Methodology

The analysis of impacts on library services addresses the potential increase in population in the commercial districts and the Town as a whole resulting from the removal of the density cap as part of the Land Use Element/Zoning Code Amendments and the ability of the Mammoth Lakes Library Branch to adequately serve the existing and future population in the Town. As the Mobility Element Update would result in new circulation and safety improvements in the Town, the enhancements would not affect population growth in the Town. Therefore, no further evaluation of the Mobility Element Update is warranted with regard to libraries.

The analysis presents information provided by the Mono County Library System. The analysis reviews the goals, policies, and implementation measures to reduce the potential effects of the increase in population resulting from the proposed amendments on the need for library services. Based on consultation with the Mono County Library System, a determination was made as to whether library facilities could accommodate the additional demand for library services resulting from the amendments without the need for a new facility or the alteration of existing facilities.

(2) Thresholds

For purposes of this EIR, the Town utilized the checklist questions in Appendix G of the *CEQA Guidelines* as thresholds of significance to determine whether a project would have a significant environmental impact regarding library services. The project would have a significant impact if the project would:

- LIB-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

³⁰ Telephone interview with Ana Danielson, Mono County Library Director, September 3, 2015.

³¹ Telephone interview with Ana Danielson, Mono County Library Director, September 3, 2015.

(3) Applicable General Plan Goals/Policies and Adopted Mitigation Measures

There are no mitigation measures in the adopted Mitigation Monitoring and Reporting Program associated with the 2007 General Plan or the Trails System Master Plan regarding library services. The 2007 General Plan includes goals and policies to support and improve public facilities and services. The following General Plan Public Health and Safety Element goal and policy relate to library services:

Goal S.5: Support high quality educational services and life-long learning resources within the community.

- **Policy S.5.A:** Encourage development and enhancement of school sites and other administrative, educational and recreational facilities.

c. Environmental Impacts

Threshold LIB-1: The project would result in a significant impact if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

Impact Statement LIB-1: *The Project would increase the residential population in the downtown area which could potentially increase the demand for library services. As there is sufficient capacity to accommodate the increase in demand within the existing library, the impact would be less than significant.*

As described in Chapter 2, Project Description, of this EIR, the proposed Land Use Element/Zoning Code Amendments would result in the removal of the existing unit and room caps in the commercial districts and would allow a maximum of 2.0 FAR. Provisions of the Community Benefits Incentive Zoning (CBIZ) and Transfer Development Rights (TDR) would be amended to remove previous allowances for developers to increase the density and/or to transfer the density of proposed projects.

The proposed removal of the density cap would accommodate greater residential and hotel densities within the Main Street and Old Mammoth Road neighborhoods compared with current projections. Therefore, the removal of the cap could introduce more people to these areas. The proposed amendments would not alter the other development standards prescribed in the Town of Mammoth Municipal Code. Specifically, the proposed Land Use Element/Zoning Code Amendments could increase the amount of the development as compared to the development otherwise occurring in the C-1 and C-2 areas by an additional 336 residential units, up to 467 hotel rooms, and approximately 152,533 square feet of commercial floor area. As discussed in Section 4.9, *Population and Housing*, of this EIR, the potential increase in development could result in an increase of up to 1,978 people including visitors and permanent residents and therefore, could result in increased demand for library services.

However, the Mono County Library System staff indicates that the existing Mammoth Lakes Library Branch adequately serves the Town and surrounding populations. Wait times for conference facilities and work stations are reasonable and there are rarely any scheduling conflicts. The Mammoth Lakes Branch Library collection of 40,000 volumes, plus the ability to order and access library holdings from other libraries throughout California, and access to the 'Zip Books' program, provides patrons with access to a wide

collection of library resources that are sufficient to meet the demand of the library's service population. Furthermore, the expansion of the Mammoth Lakes Library Branch in 2007 resulted in the facility more than doubling in size from 7,000 square feet to 17,000 square feet and provided substantial increase in amenities such as two conference rooms, a shared classroom with the Cerro Coso Community College, art and craft area, and children's area.

Furthermore, any development that would occur in the commercially designated areas as a result of the Land Use Element/Zoning Code Amendments would be required to pay the required library DIF and would also be subject to the 1.68 percent property tax allocation which supports funding of the Mono County Library System and its facilities. As such, the impacts to library services would be less than significant.

Mitigation Measures

Potential impacts to library services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

The Land Use Element/Zoning Code Amendments would result in a less than significant impact with regard to library services.

d. Cumulative Impacts

The analysis of the impact of the Land Use Element/Zoning Code Amendments on library services is cumulative in nature because it evaluates the effects of the amendments in combination with the General Plan buildout. Any future projects would be required to pay the required library DIF and would also be subject to the 1.68 percent property tax allocation which supports funding of the Mono County Library System and its facilities. Furthermore, individual development projects would be subject to review under CEQA and the Town's PIEC planning procedures, inclusive of their cumulative effects in concert with other development projects. Since the Land Use Element/Zoning Code Amendments would have a less than significant impact on library services, the amendments would not contribute to a cumulative impact to library services.