



7.0 Alternatives to the Proposed Project

7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in the *CEQA Guidelines* as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.¹

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."² The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.³

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability) economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. . .

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.⁴ In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The Town's goals and objectives for the project are based on applicable Parks and Recreation Master Plan and the Parks, Open Space, and Recreation Element goals, policies, and tasks, as follows:

¹ *CEQA Guidelines* Section 15126.6(a).

² *CEQA Guidelines* Section 15126.6(b).

³ *CEQA Guidelines* Section 15126.6(f).

⁴ *CEQA Guidelines* Section 15126.6(e)(2).

- Goal 1: Maintain parks and open space within and adjacent to Town for outdoor recreation and contemplation.
- Goal 2: Provide additional parks in Town.
- Goal 4: Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.
- Goal 5: Link parks and open space with a well-designed, year-round network of public corridors and trails within and surrounding Mammoth Lakes.
- Goal 6: Provide parks and recreational facilities and programs that foster a sense of community and nurture the emotional connection people have with each other and Mammoth Lakes.
- Tasks: To meet the recreation needs of residents and visitors into the future, the Town of Mammoth Lakes will need to increase the maintenance level of existing parks and recreation facilities, upgrade existing parks, add more usable park acreage, and develop additional facilities to address unmet recreation needs. More specifically, the Town should:
 - Design additional park improvements and recreation facilities to meet recreation needs in all seasons. These facilities include (in alphabetical order):
 - Aquatic center;
 - Dog park;
 - Event and performance venues;
 - Picnic areas;
 - Multi-use recreational/cultural facility;
 - Snow and winter play areas; and
 - Sports fields and courts.

Recreational Opportunities

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

P.4.B. Policy: 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:⁵

- Ice skating;
- Snow play;
- Walking;
- Fall-color viewing;
- Birding;
- Health & fitness; and
- BMX.

⁵ P.4.B. Policy lists 29 activities. Those listed are contemplated for this project.

Connected Throughout

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

P.5.E. Policy: Design parks and open space to be accessible and usable except when set aside for preservation of natural resources, health and safety.

P.5.G. Policy: Identify, zone and procure land for new and expanded parklands including:⁶

- Community gardens;
- Streamside parks;
- Active parks;
- Open space;
- Snow play;
- Festival and special events areas; and
- Passive parks.

In order to meet the Task for Goal 6 identified above, the Town set a goal to provide a roof over the Town-operated ice rink/RecZone, thereby extending the winter seasonal use and enhancing the summer seasonal uses. It is also the intent of the Town's Council to provide complementary facilities at the Town's ice rink/RecZone.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The proposed project would not result in any significant and unavoidable impacts and all potential impacts were reduced to a less than significant level.

Potential environmental impacts associated with the following alternatives are compared to impacts from the proposed project:

⁶ P.5.G. Policy lists 11 activities. Those listed are contemplated for this project.

- Alternative 1 – “No Project” Alternative;
- Alternative 2 – “Civic Center Parcel Alternative Site” Alternative;
- Alternative 3 – “Bell Shaped Parcel Alternative Site” Alternative; and
- Alternative 4 – “Reconfigured” Alternative.

Throughout the following analysis, the alternatives’ impacts are analyzed for each environmental issue area, as examined in [Section 5.1](#) through [Section 5.9](#) of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. [Table 7-1, *Comparison of Alternatives*](#), which is included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative’s impact in relation to the proposed project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration are: failure to meet most of the basic project objectives; infeasibility; or inability to avoid significant environmental impacts. [Section 7.5, *Environmentally Superior Alternative*](#), references the “environmentally superior” alternative, as required by the *CEQA Guidelines*.

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative’s failures to meet most of the basic project objectives, the alternative’s infeasibility, or the alternative’s inability to avoid significant environmental impacts.

As discussed in [Section 3.2, *Background and History*](#), Town Staff, working in conjunction with representatives from Mammoth Lakes Recreation (MLR) and the Recreation Commission, were tasked to evaluate and recommend appropriate sites for a Multi-Use Facility to the Town Council. This recommendation would include a new community center, ice rink, and complementary uses. After an extensive review of available Town-owned properties/managed facilities, the multiple sites that were considered for the project are shown on [Exhibit 3-3, *Previously Considered Alternative Site Locations*](#) (Community Center Parcel, Bell Shaped Parcel, Mammoth Creek Park West, Whitmore Park/Track, Field(s) and Pool, Parcel at Tavern and Sierra Park Road, and Civic Center Parcel). The Town did not include Shady Rest Park or Mammoth Creek Park East in this site selection analysis, as these properties are located in the jurisdictional boundaries of the United States Forest Service (USFS). Due to the existing land use restrictions imposed by the USFS, the Town would not be permitted to construct the project on these properties.

Based on the opportunities and constraints considered for each of these alternative site locations⁷, the following alternative site locations were considered but rejected as infeasible, and are discussed as follows:

- [*Community Center Parcel*](#): The Community Center Parcel incorporates 5.18 acres and includes a pocket-park with a new playground, six tennis courts, play and picnic areas, a pay phone and an inside meeting room, including kitchen, tables, chairs and restrooms, as well as the 2,550-square foot Community Center located at 1000 Forest Trail⁸; refer to [Exhibit 3-3](#). The

⁷ Town of Mammoth Lakes, *Mammoth Lakes Town Council Agenda October 21, 2015 Agenda Item #11*, October 13, 2015.

⁸ Town of Mammoth Lakes, *Community Center, Park and Tennis Courts*, <http://www.ci.mammoth-lakes.ca.us/index.aspx?NID=580>, accessed June 24, 2016.

opportunities at the Community Center Parcel include the existing amenities comprised of the tennis courts, playground, community center, restrooms, and parking.

The Town determined that with the existing tennis courts on-site, this facility would not be able to accommodate the proposed facilities and necessary parking to serve the project. Further, the existing building is on lease with the Mono County Office of Education (MCOE) for educational programs and would require major modifications due to the facilities conditions. Last, this alternative site location is located in North Village, which currently has impacted parking conditions. Implementation of the project at this alternative location would further exacerbate this existing condition. Thus, due to the size of this facility as well as the parking concerns, this alternative has been rejected from further analysis.

- *Whitmore Recreational Area:* The Whitmore Recreation Area is located six miles south of Mammoth Lakes, off Highway 395 along Benton Crossing Road and includes the Whitmore Park, Track & Sports Field, Whitmore Pool and three ball fields;⁹ refer to Exhibit 3-3. The Town has developed 10 acres of the total leased area (32.64 acres) for public and programmed use. The facility is leased from the Los Angeles Department of Water and Power (LADWP) and is operated by the Town of Mammoth Lakes. A shared facility maintenance agreement is also in effect with the County of Mono. Existing facilities at the Whitmore Recreation Area include a track and field, pool, and lighted ball fields.

The Town determined that although there is space for some additional facilities and parking, this site would not be able to accommodate the project upon development of approved future facilities at this site. Other constraints on this site include wind (which is a concern for a roof structure over the future ice rink), increased travel time and maintenance requirements for the Town, and overall accessibility for the community without vehicles or public transportation. Further, the Town's ad hoc committee considered the Whitmore Park/Track, Field(s) and Pool an inappropriate option due to a recent renewal of a long-term lease that requires the LADWP and Los Angeles City Council to approve contracts and building infrastructure on this leased land.

- *Trails End Park:* The Trails End Park is located on Meridian Boulevard approximately one-quarter mile south of the SR-203 and Meridian Boulevard intersection, and adjacent to the Mammoth Industrial Park¹⁰; refer to Exhibit 3-3. The Trails End Park features a recently completed 40,000-square-foot skateboard park and more recreational features are planned to be added in the future. However, this site is limited size and available parking, is heavily used, and is close to completion for buildout of facility. Thus, due to the limited availability of space at this site to construct the project, this alternative has been rejected from further analysis.

⁹ Town of Mammoth Lakes, *Whitmore Recreation Area*, <http://www.ci.mammoth-lakes.ca/us/index.aspx?NID=579>, accessed June 24, 2016.

¹⁰ Town of Mammoth Lakes, *Trails End Park and Volcom Brothers Skatepark*, <http://www.ci.mammoth-lakes.ca.us/Facilities/Facility/Details/Trails-End-Park-and-Volcom-Brothers-Skat-5>, accessed June 24, 2016.

7.1 “NO PROJECT” ALTERNATIVE

In accordance with the *CEQA Guidelines*, “the no project analysis shall discuss the existing conditions ..., as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”¹¹ The *CEQA Guidelines* continue to state that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”¹² The “No Project” Alternative includes a discussion and analysis of the existing baseline conditions at the time the Notice of Preparation was published on June 2, 2016. The No Project scenario is described and analyzed in order to enable the decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

DESCRIPTION OF ALTERNATIVE

The project site is located at Mammoth Creek Park West (686 Old Mammoth Road). The project site is approximately 4.9 acres and is comprised of playground equipment, grass/open space, picnic areas, trail connections, and a surface parking lot for 44 vehicles. Vehicular access to the site is provided via Old Mammoth Road, and pedestrians/trail users can access the site via the Town Loop trail to the east and south of the project site. The primary local roadway providing access to the project site is Old Mammoth Road. The Town’s existing community center (1000 Forest Trail) and Mammoth Ice Rink (416 Sierra Park Road) are located approximately 1.38 miles to the northwest, and 0.30-mile to the northeast of the project site, respectively.

The No Project Alternative would retain the project site in its current condition. With this Alternative, the operations of the existing community center and Mammoth Ice Rink would continue similar to existing conditions, and would not be relocated to the project site. Under the No Project Alternative, a new covered ice rink, support facilities, and community multi-use facilities would not be constructed at Mammoth Creek Park West. No landscape or hardscape improvements would be provided at Mammoth Creek Park West.

The Town would be required to extend the existing lease with the Mammoth Unified School District (MUSD) and the Mono County Office of Education (MCOE). The existing Mammoth Ice Rink would continue to operate as an ice rink in winter and the Mammoth RecZone, an outdoor venue with a small amount of shade, lights, and concessions offering activities (inline/roller skating, skate ramps, volleyball, badminton, basketball, etc.) during the summer. The existing operations at the year-round community center would also continue. The 2,500 square-foot facility’s deficiencies, including extensive building deterioration, on-going maintenance issues, and functional inefficiencies, would remain.

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

¹¹ *CEQA Guidelines Section 15126.6(e)(2)*.

¹² *CEQA Guidelines Section 15126.6(e)(3)(B)*.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the No Project Alternative, no development would occur at Mammoth Creek Park West under this Alternative. Similar to the proposed project, the No Project Alternative would not require amendments to the General Plan or Zone Code. However, under this Alternative, no new land use approvals and permits would be required.

Implementation of this Alternative would not meet the goals and objectives of the Town of Mammoth Lakes Parks and Recreation Master Plan. A new covered ice rink, support facilities, and community multi-use facilities would not be constructed under this Alternative. Thus, the No Project Alternative would be environmentally inferior to the proposed project regarding land use consistency.

Aesthetics/Light and Glare

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would not occur with the No Project Alternative. Therefore, the project's construction-related impacts to the visual character/quality of the project site and its surroundings would be avoided.

No visual impacts to designated scenic views/vistas would occur with the No Project Alternative. However, no increases in available public views at the Mammoth Creek Park West facility would occur. The project site's long-term visual character would be altered with the proposed project as a result of development of the new community multi-use facilities. The existing active recreational uses at the project site would be expanded, including construction of a new 35-foot structure. The existing views toward visual resources at Mammoth Creek Park West would be expanded as well. Landscape and hardscape features would be altered and existing pine trees would be removed and replaced on-site, as required. Last, the project would increase light and glare experienced in the project vicinity. With implementation of the No Project Alternative, these changes in long-term visual character of the project site would not occur, and the project site would remain in its current condition. The project's less than significant impact to the area's visual character/quality and light/glare would be avoided with the No Project Alternative.

The No Project Alternative would be environmentally superior to the proposed project regarding aesthetics/light and glare, given it would avoid less than significant impacts to short-term visual character/quality, long-term visual character/quality, and light/glare.

Biological Resources

Project implementation would not impact special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the Town's tree preservation ordinance would be reduced to a less than significant level with the implementation of recommended mitigation. Under the No Project Alternative, no construction activities would occur, and the project site would remain in its current condition. Therefore, although less than significant, the project's impacts would be avoided. As with the proposed project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters would occur with this

Alternative. Impacts pertaining to migratory birds and consistency with the Town's tree preservation ordinance would be avoided altogether.

The No Project Alternative would be environmentally superior to the proposed project regarding biological resources, given it would not change the site, and would avoid less than significant impacts to migratory birds and habitat.

Cultural Resources

Cultural resources (CA-MNO-561) have been identified on the project site. Implementation of the proposed project was determined to not impact the California Register of Historical Resources (CRHR) eligibility of this resource as a whole. Further, although the data potential for the site has been exhausted by the Phase II investigation, the possibility for intact features (e.g., hearths, burials) within the project site remains. Although no conditions exist that suggest human remains are likely to be found on the project site, development of the project site could result in the discovery of human remains and potential impacts to these resources. With implementation of the recommended Mitigation Measure CUL-1 and compliance with existing State regulations regarding human remains, cultural resource impacts would be reduced to less than significant levels. Under the No Project Alternative, these impacts would be avoided. Comparatively, less than significant potential impacts to historical resources would occur with the proposed project, while no impacts would occur with this Alternative.

The No Project Alternative would be environmentally superior to the proposed project regarding cultural resources, given it would avoid the potential for any impact to occur.

Traffic and Circulation

Existing a.m. and p.m. peak hour intersection operating conditions were evaluated in the Traffic Impact Analysis; refer to [Section 5.5, *Traffic and Circulation*](#). All study intersections are currently operating at an acceptable LOS (LOS D or better) during the peak hours based on the Town's LOS standards. These existing conditions would continue with the No Project Alternative, but may be affected by additional growth in the area over time. Project implementation would result in less than significant impacts at intersections. The increase in average daily traffic (ADT) projected to occur with the proposed project would not occur with this Alternative, as the proposed project would not be developed. Therefore, although less than significant, the project's impacts to study area intersections would be avoided.

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

Air Quality

[Table 5.6-5, *Maximum Daily Construction Emissions*](#), presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from grading, excavation, and construction activities would not occur with the No Project Alternative. Therefore, the short-term air quality impacts that would occur with the proposed project would be avoided with this Alternative.

The proposed project would not exceed the Great Basin Unified Air Pollution Control District's (GBUAPCD) emissions thresholds, as indicated in Table 5.6-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would not occur with the No Project Alternative. Therefore, the air quality emissions that would occur with the proposed project would be avoided with this Alternative.

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

Greenhouse Gas Emissions

As indicated in Table 5.7-1, *Project Related Greenhouse Gas Emissions*, project implementation would result in 801.28 metric tons of carbon dioxide equivalents per year (MTCO₂eq/yr), which is below the 900 MTCO₂eq/yr threshold. Thus, less than significant short-term and operational greenhouse gas (GHG) emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would not occur with the No Project Alternative. Therefore, the GHG emissions that would occur with the proposed project would be avoided with this Alternative.

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

Noise

Construction noise associated with the proposed project would result in less than significant impacts. The project's construction-related vibration impacts are also anticipated to be less than significant. Construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would not occur with the No Project Alternative. Therefore, the short-term construction-related noise and vibration impacts that would occur with the proposed project would be avoided with this Alternative.

As shown in Table 5.8-4, *Existing Traffic Noise Levels*, existing noise within the area from mobile sources ranges from 51.2 A-weighted decibels (dBA) to 65.1 dBA at 100 feet from the roadway centerline. These existing conditions would continue with the No Project Alternative but may be impacted by additional growth in the area over time. Project implementation would result in less than significant impacts from mobile noise sources. The increase in ADT projected to occur with the proposed project would not occur with this Alternative, as the proposed project would not be developed. Therefore, although less than significant, the project's long-term noise impacts from mobile sources would be avoided.

Project implementation would result in less than significant impacts from stationary noise sources with implementation of the recommended mitigation. The increased noise from stationary sources (i.e., mechanical equipment, community center, ice rink, recreation zone, etc.) would not occur with this Alternative, as the proposed community multi-use facilities would not be developed. Therefore, although less than significant, the project's long-term noise impacts from stationary sources would be avoided.

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

Hydrology and Water Quality

The No Project Alternative would result in no short-term impacts to water quality associated with grading, excavation, or construction activities, as site development would not occur. Comparatively, less than significant water quality project impacts (with mitigation incorporated) from construction activities would be avoided with this Alternative.

The No Project Alternative would avoid the project's long-term operational impacts to water quality and quantity, as new community multi-use facilities would not be developed and increased traffic activities would not occur. The post-construction Best Management Practices (BMPs) to address pollutants in storm water runoff and new drainage improvements that would be constructed with the proposed project would not be constructed with this Alternative. Since new development would not occur, impacts related to hydrology and water quality that would occur with the proposed project would not occur with the No Project Alternative.

The No Project Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality impacts. As construction activities would not occur and new land uses would not be developed, no changes in drainage patterns or on-site operations would occur. However, no BMPs would be constructed on-site.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would not attain any of the project's basic objectives. The existing ice rink and community facilities would not be relocated closer to public corridors/trails. New active outdoor recreational opportunities for all seasons would not be created. Lastly, this Alternative would not provide a covered roof structure over the Town's ice rink facility. This Alternative would not fulfill the Town's goal to provide a roof over the Town-operated ice rink/RecZone. This Alternative would not extend the winter seasonal use or enhance the summer seasonal use at the Town-operated ice rink/RecZone. Also, this Alternative would not provide complementary facilities at the Town's ice rink/RecZone.

7.2 “CIVIC CENTER PARCEL ALTERNATIVE SITE” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Civic Center Parcel is on the east side of Sierra Park Road at the eastern extension of Tavern Road; refer to [Exhibit 7-1, *Civic Center Parcel Alternative Site Location*](#). This Town-owned parcel is approximately four acres. Currently, the Civic Center Parcel is planned for government facilities and may include future shared government facilities with Mono County. The Town's new Police Station is currently under construction in the northeast portion of the site off Thompson Way.



Source: Google Earth, 2016.

NOT TO SCALE

Michael Baker
INTERNATIONAL



12/16 • JN 151373

ENVIRONMENTAL IMPACT REPORT
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES
Civic Center Parcel Alternative Site Location

Exhibit 7-1

Under the Civic Center Parcel Alternative Site Alternative, the proposed new ice rink/recreation/event area (RecZone) would be developed at the Civic Center Parcel. This Alternative would encompass an ice rink (winter)/RecZone covered by a roof structure and additional storage and support space, similar to the proposed project. However, based on available space upon completion of the proposed Police Station at this site, a complementary community center or active outdoor recreational area would not be constructed. Appropriate surface parking and utility connections would be required to be installed. Similar to the proposed project, upon project completion of construction, the existing Mammoth Ice Rink/RecZone (located at 416 Sierra Park Road) would be made inactive, and the existing community center (located at 1000 Forest Trail) would remain under Town operation.

The following discussion evaluates the potential environmental impacts associated with the Civic Center Parcel Alternative Site Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Civic Center Parcel Alternative Site Alternative, the project features would be constructed at the Civic Center Parcel. Similar to the proposed project, this Alternative would not require amendments to the General Plan or Zone Code and would also require new land use approvals and permits. Implementation of this Alternative would meet the goals and objectives of the Town of Mammoth Lakes Parks and Recreation Master Plan, although not to the extent of the project, as no complimentary facilities (i.e., a complementary community center or active outdoor recreational area) would be provided. Thus, the Civic Center Parcel Alternative Site Alternative would be environmentally inferior to the proposed project regarding land use consistency.

Aesthetics/Light and Glare

Under the Civic Center Parcel Alternative Site Alternative, the short-term visual impacts associated with grading and construction activities that would occur with the proposed project would not occur at the Mammoth Creek Park West facility. However, short-term visual impacts associated with grading and construction activities would occur at the Civic Center Parcel, although to a slightly lesser extent than the project (as no complementary facilities would be constructed). Residential uses surrounding Mammoth Creek Park West would no longer be exposed to these short-term construction impacts. Therefore, the project's less than significant construction-related impacts to the visual character/quality of the project site and its surroundings would be avoided, but new less than significant construction-related impacts to the visual character/quality near the Civic Center Parcel would result, although to a less degree than the proposed project since surrounding uses are not as sensitive to these visual changes and the proposed area of disturbance would be reduced.

With development of the Civic Center Parcel Alternative Site Alternative, no visual impacts to the designated scenic views near Mammoth Creek Park West would occur. However, new impacts to designated scenic views along SR-203 toward the Sherwin Range would result. Under this Alternative, the project's less than significant long-term impacts to the visual character at the Mammoth Creek Park West facility would be avoided. However, new long-term impacts to the visual character at the

Civic Center Parcel would result. Last, the project's increased light and glare at Mammoth Creek Park West would not result; however, new sources of light and glare would be introduced at the Civic Center Parcel.

The Civic Center Parcel Alternative Site Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare. Although there would be fewer facilities located at this site, compared to the project, the main structure (the ice rink/RecZone) would still be constructed, resulting in similar impacts as the project (although at a new location in the Town).

Biological Resources

Project implementation would result in less than significant impacts as the project does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the Town's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the Civic Center Parcel Alternative Site Alternative, construction of the project at the Mammoth Creek Park West facility would not occur. However, construction of the community multi-use facilities would occur at the Civic Center Parcel, which currently consists of mostly vacant land. Development of this Alternative could result in new impacts to special status plant or wildlife species or sensitive vegetation communities. Further, similar to the proposed project, development at the Civic Center Parcel would require removal of existing pine trees and construction impacts could affect migratory birds.

The Civic Center Parcel Alternative Site Alternative would be neither environmentally superior nor inferior to the proposed project regarding biological resources.

Cultural Resources

Cultural resources (CA-MNO-561) have been identified on the project site. Implementation of the proposed project was determined to not impact the CRHR eligibility of this resource as a whole. Although the data potential for the site has been exhausted by the Phase II investigation, the possibility for intact features within the project site remains. Although no conditions exist that suggest human remains are likely to be found on the project site, development of the project site could result in the discovery of human remains and potential impacts to these resources. With implementation of the recommended Mitigation Measure CUL-1 and compliance with existing State regulations regarding human remains, project impacts in this regard would be reduced to less than significant levels. Under the Civic Center Parcel Alternative Site Alternative, there would be no potential for impacts to cultural resources or human remains at the Mammoth Creek Park West facility, since development would not occur at this site.

Based on the cultural resources survey conducted for the Mammoth Community Facilities Acquisition no significant cultural resources or heritage resources are anticipated to occur on the Civic Center Parcel.¹³ However, the potential to encounter unknown cultural resources still exists, as the Civic Center Parcel encompasses mostly vacant land. Thus, impacts to cultural resources would be slightly

¹³ Nicholas A. Faust, North Zone Archaeologist, Inyo Forest, United States Department of Agriculture Forest Service, *Mammoth Fire Station and Community Church Land Exchanges, Heritage Resources Section 106 and NEPA Documentation*, October 21, 2004.

reduced under the Civic Center Parcel Alternative Site Alternative, compared to the proposed project in this regard. Similar to the proposed project, impacts pertaining to encountering unknown human remains would be reduced to less than significant levels with compliance with existing State regulations.

The Civic Center Parcel Alternative Site Alternative would be environmentally superior to the proposed project regarding potential impacts to cultural resources.

Traffic and Circulation

Under the Civic Center Parcel Alternative Site Alternative, the project's construction truck trips and operational net 116 p.m. peak hour (62 entering; 54 existing) trips would occur at the Civic Center Parcel, rather than at Mammoth Creek Park West, although to a lesser extent than the project (as no complimentary facilities would be constructed). Therefore, the project's less than significant impacts on the study area intersections would not occur, but new traffic impacts on other Town intersections would result. As the Civic Center Parcel Alternative Site Alternative would result in reduced trip generation, compared to the proposed project, this Alternative would be environmentally superior to the proposed project regarding traffic and circulation impacts.

Air Quality

Table 5.6-5, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from grading, excavation, and construction activities would still occur in the Town, although at the Civic Center Parcel, rather than the Mammoth Creek Park West facility. Comparatively, the construction-related air quality impacts would be slightly reduced compared to the proposed project, given slightly less ground-disturbing activities would occur (compared to the project), although at a different site in the Town. Therefore, the short-term air quality impacts would be slightly reduced under this Alternative.

The proposed project would not exceed the GBUAPCD's emissions thresholds, as indicated in Table 5.6-6. Additionally, the project would not result in CO hotspots at any of the study intersections. Although at a different site in Town, long-term air quality impacts from mobile and area source pollutant emissions would still occur as a result of the Civic Center Parcel Alternative Site Alternative, although to a lesser extent. This Alternative would result in reduced development and vehicle trips, as compared to the proposed project. With this Alternative, long-term air quality impacts from mobile pollutant emissions would be reduced, as compared to the proposed project.

The Civic Center Parcel Alternative Site Alternative would be environmentally superior to the proposed project regarding air quality impacts.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, project implementation would result in 801.28 MTCO₂eq/yr, which is below the 900 MTCO₂eq/yr threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. Although at a different site in Town, the similar GHG emissions from construction and operational activities would also occur with the Civic

Center Parcel Alternative Site Alternative, although to a slightly less degree compared to the proposed project given no complimentary facilities would be constructed. As with the proposed project, the combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective under this Alternative, although to a lesser extent than the project.

The Civic Center Parcel Alternative Site Alternative would be environmentally superior to the proposed project regarding GHG emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from grading, excavation, and construction activities would still occur with the Civic Center Parcel Alternative Site Alternative, although to a lesser degree than the project and in a different location in Town. Comparatively, the project's construction-related noise impacts would no longer impact those residents surrounding the Mammoth Creek Park West facility. However, those sensitive receptors near the Civic Center Parcel (i.e., Mammoth Hospital and Mammoth Mountain RV Park) would be exposed to the project's construction sources. Construction sources from this Alternative would be slightly less than the proposed project, since no complimentary facilities would be constructed. Further, Mammoth Hospital and the RV Park are considered less sensitive to noise than multi-family residential uses per the Town's Municipal Code and General Plan. Thus, the sensitivity of the surrounding uses at the project site and considered more noise sensitive than the uses surrounding the Civic Center Parcel. Therefore, short-term construction-related impacts would be less than those considered for the proposed project.

As shown in [Table 5.8-4](#), existing noise within the area from mobile noise ranges from 51.2 dBA to 65.1 dBA at 100 feet from the roadway centerline. Long-term noise impacts from vehicular travel on the surrounding roadway network near Mammoth Creek Park West would no longer occur with the Civic Center Parcel Alternative. However, new mobile noise source impacts along the surrounding roadway network for the Civic Center Parcel would result under this Alternative. These mobile noise sources would be slightly less than the proposed project, given that no complimentary facilities would be constructed. Comparatively, the project's mobile noise impacts would no longer impact those residents surrounding the Mammoth Creek Park West facility. However, those sensitive receptors near the Civic Center Parcel (i.e., Mammoth Hospital and Mammoth Mountain RV Park) would be exposed to the Alternative's mobile noise. As interior noise thresholds do not apply to Mammoth Hospital, and the RV Park would be considered a transient-use, these sensitive receptors would be considered slightly less sensitive than residential uses near Mammoth Creek Park West. Thus, mobile noise-related impacts would be less than those considered for the proposed project.

Project implementation would result in less than significant impacts from stationary noise sources with implementation of recommended mitigation. The increased noise from stationary sources from the proposed project (i.e., mechanical equipment, ice rink, recreation zone, etc.), would not occur in and near Mammoth Creek Park West with this Alternative. However, new stationary noise impacts from these activities would occur within and near the Civic Center Parcel. Comparatively, stationary noise sources from the community center and active outdoor area would not result with this Alternative. As discussed above, although sensitive residential uses would no longer be exposed to stationary noise from the project, new sensitive receptors (Mammoth Hospital and Mammoth

Mountain RV Park) would be exposed. These sensitive receptors would not be considered as sensitive as those surrounding Mammoth Creek Park West. Thus, implementation of the Civic Center Parcel Alternative Site Alternative would result in reduced stationary noise impacts.

The Civic Center Parcel Alternative Site Alternative would be environmentally superior to the proposed project regarding noise.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading and construction activities. Implementation of the Civic Center Parcel Alternative Site Alternative would similarly result in short-term impacts to water quality at the Civic Center Parcel, rather than Mammoth Creek Park West. Comparatively, this Alternative's short-term impacts to water quality would be slightly less than the proposed project and in a different location in Town, given this Alternative would involve a reduced area of site disturbance.

The project's long-term operational impacts to water quality and quantity would no longer occur at Mammoth Creek Park West. However, new land uses would operate on the Civic Center Parcel and an increase in traffic volumes would occur (increasing water quality concerns at this location), although to a lesser degree than the project given the smaller development footprint. Further, the project's less than significant impacts involving a 100-year flood zone would be avoided with this Alternative, as the Civic Center Parcel is not located within a 100-year flood zone.

The Civic Center Parcel Alternative Site Alternative would be environmentally superior to the proposed project regarding hydrology and water quality.

ABILITY TO MEET PROJECT OBJECTIVES

The Civic Center Parcel Alternative Site Alternative would meet some of the project's basic objectives. The existing ice rink would be relocated closer to public corridors/trails. A covered roof structure over the Town's ice rink facility would also be provided. However, a complimentary community center and new active outdoor recreational opportunities for all seasons would not be created. Further, implementation of this Alternative would preclude the Town from placing future government facilities at this property. The proposed project would not meet the Town's goals and objectives for a government facilities at this location.

7.3 “BELL SHAPED PARCEL ALTERNATIVE SITE” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Bell Shaped Parcel is approximately 16.7 acres located at the southwest corner of the intersection of Minaret Road and Meridian Boulevard; refer to [Exhibit 7-2, Bell Shaped Parcel Alternative Site Location](#). This Alternative site location currently consists of vacant land, with several trees, an open meadow, and drainage features present. Currently, there is a lack of existing public infrastructure (i.e., parking, water, electricity, sewer connections, etc.) supporting the site.



Source: Google Earth, 2016.

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

Bell Shaped Parcel Alternative Site Location

Under the Bell Shaped Parcel Alternative Site Alternative, the proposed community multi-use facilities would be developed at the Bell Shaped Parcel. This Alternative would encompass an ice rink (winter)/RecZone covered by a roof structure, complimentary community center, additional storage and support space, as well as an outdoor active area, similar to the proposed project. Appropriate surface parking and utility connections would be required to be installed. Similar to the proposed project, upon project completion of construction, the existing Mammoth Ice Rink/RecZone (located at 416 Sierra Park Road) would be made inactive, and the existing community center (located at 1000 Forest Trail) would remain under Town operation.

The following discussion evaluates the potential environmental impacts associated with the Bell Shaped Parcel Alternative Site Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Bell Shaped Parcel Alternative Site Alternative, the project features would be constructed at the Bell Shaped Parcel. Similar to the proposed project, this Alternative would not require amendments to the General Plan or Zone Code and would also require new land use approvals and permits. Implementation of this Alternative would meet the goals and objectives of the Town of Mammoth Lakes Parks and Recreation Master Plan, as complimentary facilities and a covered ice rink/RecZone would be provided along Town trails and public transit stops. Thus, the Bell Shaped Parcel Alternative Site Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use consistency.

Aesthetics/Light and Glare

Under the Bell Shaped Parcel Alternative Site Alternative, the short-term visual impacts associated with grading and construction activities that would occur with the proposed project would not occur at the Mammoth Creek Park West facility. However, similar short-term visual impacts associated with grading and construction activities would occur at the Bell Shaped Parcel. New sensitive viewers located in the vicinity of the Bell Shaped Parcel would include surrounding residential uses to the east and south, as well as recreational users (Sierra Star Golf Course) to the north and west. Therefore, the project's less than significant construction-related impacts to the visual character/quality of the project site and its surroundings would be similar with this Alternative.

With development of the Bell Shaped Parcel Alternative, no visual impacts to the designated scenic views near Mammoth Creek Park West would occur. Although SR-203 is an eligible for listing as a State scenic highway, the existing Bell Shaped Parcel is not visible from SR-203. Thus, under this Alternative, the proposed community multi-use facilities would not impact this State scenic highway.

The project's less than significant long-term impacts to view blockage of visual resources and visual character at the Mammoth Creek Park West facility would be avoided with this Alternative. However, new impacts to view blockage of visual resources (as seen from Minaret Road) and visual character of this Alternative Site and surrounding community would occur. Lastly, the project's increased light and glare at Mammoth Creek Park West would not result; however, new sources of light and glare would be introduced at the Bell Shaped Parcel.

The Bell Shaped Parcel Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare.

Biological Resources

Project implementation would result in less than significant impacts as the project does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the Town's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the Bell Shaped Parcel Alternative, construction of the project at the Mammoth Creek Park West facility would not occur. However, construction of the community multi-use facilities would occur at the Bell Shaped Parcel, which currently consists of vacant land. Based on the U.S. Army Corps of Engineers (ACOE), Los Angeles District, *Preliminary Jurisdictional Determination Regarding Geographic Jurisdiction*, dated September 22, 2016, the ACOE preliminarily determined that waters of the U.S. may be present on the Bell Shaped Parcel. Indications of the presence of waters of the U.S., including wetlands, were noted. Thus, development of this Alternative could result in impacts to jurisdictional wetlands, whereas the project would not. Further, development of this Alternative could result in impacts to special status plant or wildlife species or sensitive vegetation communities as well. Similar to the proposed project, this Alternative would result in tree removal activities and construction impacts could affect migratory birds.

The Bell Shaped Parcel Alternative would be environmentally inferior to the proposed project regarding biological resources, considering new potential impacts to wetlands at this location.

Cultural Resources

Cultural resources (CA-MNO-561) have been identified on the project site. Implementation of the proposed project was determined to not impact the CRHR eligibility of this resource as a whole. Although the data potential for the site has been exhausted by the Phase II investigation, the possibility for intact features (e.g., hearths, burials) within the project site remains. Although no conditions exist that suggest human remains are likely to be found on the project site, development of the project site could result in the discovery of human remains and impacts to these resources. With implementation of the recommended Mitigation Measure CUL-1 and compliance with existing State regulations regarding human remains, impacts in this regard would be reduced to less than significant levels.

Under the Bell Shaped Parcel Alternative, there would be no potential for impacts to cultural resources or human remains at the Mammoth Creek Park West facility, since development would not occur at this site. However, construction of the proposed community multi-use facilities would occur at the Bell Shaped Parcel. As the cultural resources can be commonly found throughout the Eastern Sierras, the potential to encounter unknown cultural resources within the Bell Shaped Parcel exists. Similar to the proposed project, impacts pertaining to encountering unknown human remains would be reduced to less than significant levels with compliance with existing State regulations.

The Bell Shaped Parcel Alternative would be environmentally superior to the proposed project regarding potential impacts to cultural resources, as no impacts to CA-MNO-561 would occur.

Traffic and Circulation

Under the Bell Shaped Parcel Alternative Site Alternative, the project's construction truck trips and operational net 116 p.m. peak hour (62 entering; 54 existing) trips would occur at the Bell Shaped Parcel, rather than at Mammoth Creek Park West. Therefore, the project's less than significant impacts on the study area intersections would not occur, but new traffic impacts on other Town intersections would result. Thus, the Bell Shaped Parcel Alternative would be neither environmentally superior nor inferior to the proposed project regarding traffic and circulation impacts.

Air Quality

Table 5.6-5 presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from grading, excavation, and construction activities would still occur in the GBUAPCD boundaries, although at the Bell Shaped Parcel, rather than the Mammoth Creek Park West facility. Comparatively, the construction-related air quality impacts would be similar as the proposed project, given ground-disturbing activities would occur, although at a different site in the Town. Therefore, the short-term air quality impacts that would occur with the proposed project would also result under this Alternative.

The proposed project would not exceed the GBUAPCD's emissions thresholds, as indicated in Table 5.6-6. Additionally, the project would not result in CO hotspots at any of the study intersections. Although at a different site in Town, long-term air quality impacts from mobile and area source pollutant emissions would still occur as a result of Bell Shaped Parcel Alternative. This Alternative would result in similar development and vehicle trips, as compared to the proposed project. With this Alternative, similar long-term air quality impacts from mobile pollutant emissions would occur, as compared to the proposed project.

The Bell Shaped Parcel Alternative would be neither environmentally superior nor inferior to the proposed project regarding air quality impacts.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, project implementation would result in 801.28 MTCO₂eq/yr, which is below the 900 MTCO₂eq/yr threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. Although at a different site in the GBUAPCD boundaries, the same GHG emissions from construction and operational activities would also occur with the Bell Shaped Parcel Alternative. As with the proposed project, the combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective under this Alternative.

The Bell Shaped Parcel Alternative would be neither environmentally superior nor inferior to the proposed project regarding GHG emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts. The project's construction-related vibration impacts are also anticipated to be less than significant.

Short-term noise impacts from grading, excavation, and construction activities would still occur with the Bell Shaped Parcel Alternative, although in a different location in the Town. Comparatively, the project's construction-related noise impacts would no longer impact residents surrounding the Mammoth Creek Park West facility. However, new sensitive receptors near the Bell Shaped Parcel would include surrounding residential uses. Thus, short-term construction-related impacts would be similar to those considered for the proposed project.

As shown in Table 5.8-4, existing noise within the area from mobile noise ranges from 51.2 dBA to 65.1 dBA at 100 feet from the roadway centerline. Long-term noise impacts from vehicular travel on the surrounding roadway network near Mammoth Creek Park West would no longer occur with the Bell Shaped Parcel Alternative. However, new mobile noise source impacts would occur along the surrounding roadway network for the Bell Shaped Parcel under this Alternative. Comparatively, the project's mobile noise impacts would no longer impact those residents surrounding the Mammoth Creek Park West facility. However, those sensitive receptors near the Bell Shaped Parcel (i.e., residential uses) would be exposed to the project's mobile noise. Thus, mobile noise-related impacts would be similar to the proposed project.

Project implementation would result in less than significant impacts from stationary noise sources with implementation of recommended mitigation. The increased noise from stationary sources from the proposed project (i.e., mechanical equipment, community center, ice rink, recreation zone, etc.) would not occur in and near Mammoth Creek Park West with this Alternative. As discussed previously, residential uses would be exposed to these stationary noise sources with implementation of this Alternative. Thus, implementation of the Bell Shaped Parcel Alternative Site Alternative would result in similar stationary noise impacts.

Thus, the Bell Shaped Parcel Alternative Site Alternative would be neither environmentally superior nor inferior to the proposed project regarding noise.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading, excavation, and construction activities. Implementation of the Bell Shaped Parcel Alternative would similarly result in short-term impacts to water quality at the Bell Shaped Parcel, rather than Mammoth Creek Park West. Comparatively, this Alternative's short-term impacts to water quality would be similar to the proposed project (although in a different location in the Town), given this Alternative would involve a similar development on vacant land.

This Alternative would result in similar long-term operational impacts to water quality and quantity as the project, given permeable surfaces would be replaced with impermeable surfaces, new land uses would operate on the Bell Shaped Parcel, and an increase in traffic volumes would occur. However, it should be noted that the project's less than significant impacts involving a 100-year flood zone would be avoided with this Alternative, as the Bell Shaped Parcel is not located within a 100-year flood zone.

Although slightly reduced, the Bell Shaped Parcel Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

ABILITY TO MEET PROJECT OBJECTIVES

The Bell Shaped Parcel Alternative would meet most of the project's basic objectives. A complimentary community center and active outdoor area that would provide recreational opportunities for all seasons would be created. A covered roof structure over the Town's ice rink facility would also be provided. However, the multi-use community facilities would not be relocated closer to public corridors/trails and public transit within the Town.

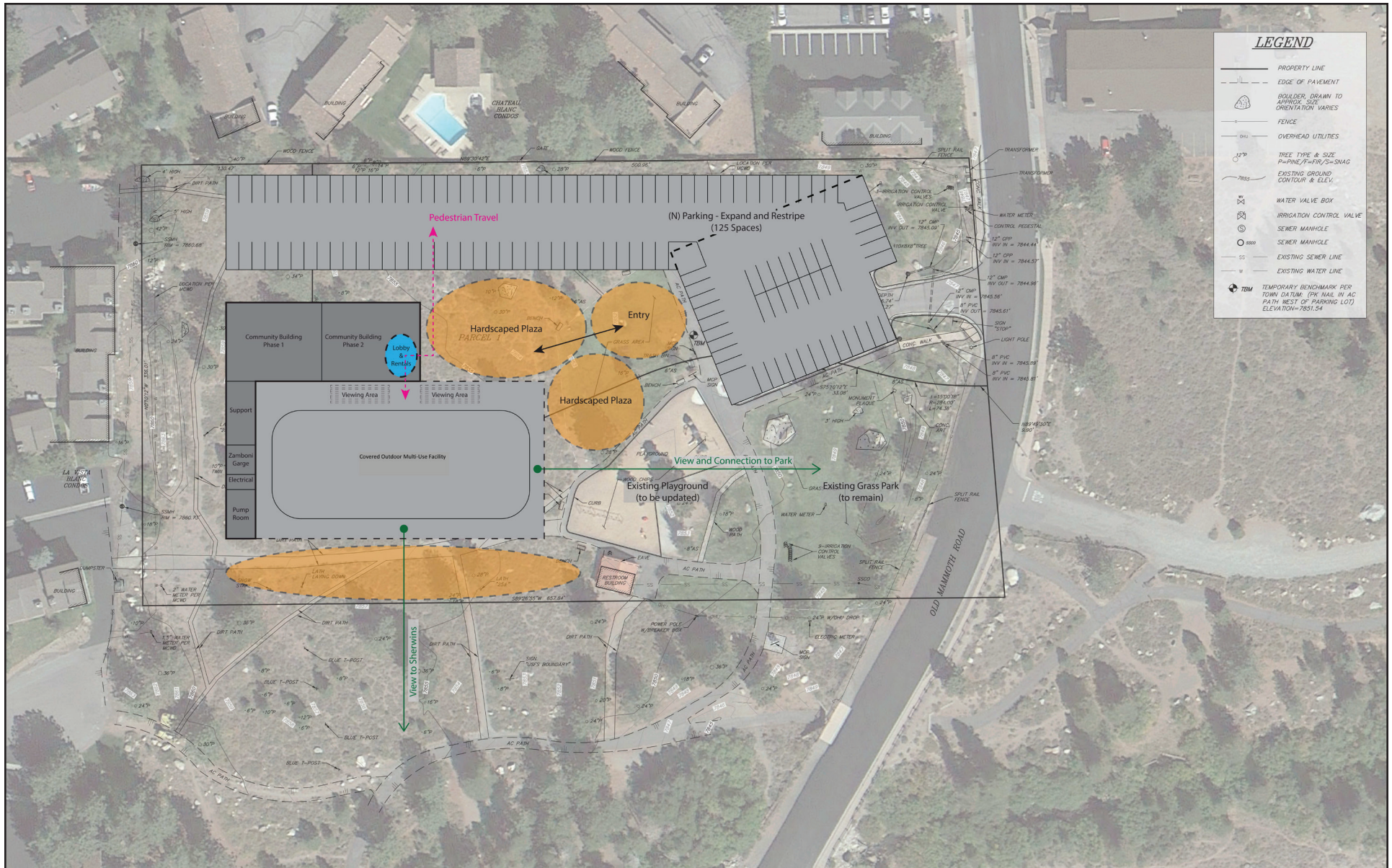
7.4 “RECONFIGURATION” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

On Friday, January 29, 2016 the Town hosted a Plan Mammoth Creek Park meeting at Town Hall, Suite Z, to present three distinct site planning alternatives (Site Concept 1, Site Concept 2, and Site Concept 3) for Mammoth Creek Park West. Each of these included the same features (multi-use facility, community center, and enhanced playground). They also include access and parking areas, public plaza's, entrance areas, and other appurtenances. Based on comments received from the public, Site Concept 3 was the general public's preference for site planning purposes, as it would reduce noise impacts to off-site sensitive receptors, has preferred public views of the Sherwin Range, and has preferred orientation for solar and protection from the sun. Based on this public meeting, the Town used Site Concept 3 and developed the proposed project's site plan, which responded to public concerns brought forth. However, for the purposes of this analysis, Site Concept 3 has been used for the Reconfiguration Alternative.

The Reconfiguration Alternative would reconfigure the proposed structures, resulting in less building square-footage for the proposed community facility; refer to [Exhibit 7-3, Reconfiguration Alternative Site Plan](#). Under the Reconfiguration Alternative, the proposed new community multi-use facilities would be developed at the project site, but shifted slightly west (compared to the proposed project). The new community multi-use facilities would encompass an ice rink (winter)/RecZone covered by a roof structure, similar to the proposed project. However, additional support space and community center square-footage would be reduced by approximately 3,000 square feet. Surface parking and utility connections would be constructed, similar to the proposed project. Under this Alternative, an active outdoor recreation area would also be constructed. Similar to the proposed project, upon project completion of construction, the existing Mammoth Ice Rink/RecZone (located at 416 Sierra Park Road) would be made inactive, and the existing community center (located at 1000 Forest Trail) would remain under Town operation.

The following discussion evaluates the potential environmental impacts associated with the Reconfiguration Alternative, as compared to impacts from the proposed project.



Source: HMC Architects; dated January 13, 2016.

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ENVIRONMENTAL IMPACT REPORT
MAMMOTH CREEK PARK WEST
NEW COMMUNITY MULTI-USE FACILITIES
Reconfiguration Alternative Site Plan

Exhibit 7-3

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Reconfiguration Alternative, the project features would be constructed at the project site, although with slightly less square footage for the support space/community facilities. Similar to the proposed project, this Alternative would not require amendments to the General Plan or Zone Code and would also require new land use approvals and permits. Implementation of this Alternative would meet the goals and objectives of the Town of Mammoth Lakes Parks and Recreation Master Plan, although not to the extent of the project, as fewer community facility space would be made available to the public. It also does not include reconfiguration of the existing playground facility. Thus, the Reconfiguration Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use consistency.

Aesthetics/Light and Glare

Under the Reconfiguration Alternative, the short-term visual impacts associated with grading and construction activities that would occur with the proposed project would also occur with this Alternative, although to a slightly less affect as a result of fewer building square footage. Therefore, the project's less than significant construction-related impacts to the visual character/quality of the project site and its surroundings would be slightly reduced with this Alternative.

This Alternative would result in similar impacts to scenic views as the proposed project. The project's less than significant long-term impacts to the visual character at the Mammoth Creek Park West facility would remain under development of this Alternative.

The Reconfiguration Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare.

Biological Resources

Project implementation would result in less than significant impacts as the project does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the Town's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the Reconfiguration Alternative, construction of the project at the Mammoth Creek Park West facility would also occur with this Alternative, resulting in a similar disturbance footprint as the proposed project. Similar to the proposed project, this Alternative would not result in impacts to special status plant or wildlife species or sensitive vegetation communities. Further, similar to the proposed project, construction impacts would affect migratory birds and would be required to comply with the Town's tree preservation ordinance.

The Reconfiguration Alternative would be neither environmentally superior nor inferior to the proposed project regarding biological resources.

Cultural Resources

Cultural resources (CA-MNO-561) have been identified on the project site. Implementation of the proposed project was determined to not impact the CRHR eligibility of this resource as a whole. Although the data potential for the site has been exhausted by the Phase II investigation, the possibility for intact features (e.g., hearths, burials) within the project site remains. Although no conditions exist that suggest human remains are likely to be found on the project site, development of the project site could result in the discovery of human remains and potential impacts to these resources. With implementation of the recommended Mitigation Measure CUL-1 and compliance with existing State regulations regarding human remains, impacts in this regard would be reduced to less than significant levels. Under the Reconfiguration Alternative, similar impacts to the existing cultural resource CA-MNO-561 exists. As with the proposed project, under this Alternative, Mitigation Measure CUL-1 would be required to reduce impacts in this regard to less than significant levels. Similar less than significant impacts to human remains would also occur with compliance with existing State regulations.

The Reconfiguration Alternative would be neither environmentally superior nor inferior to the proposed project regarding potential impacts to cultural resources, given it would involve similar ground-disturbing activities within the same development area.

Traffic and Circulation

Under the Reconfiguration Alternative, additional support space and community center square-footage at the project site would be reduced by approximately 3,000 square feet. Therefore, this Alternative would have a proportionate reduction of ADT compared to the proposed project. Comparatively, the traffic and circulation impacts under the Reconfiguration Alternative would be slightly less than the proposed project, given this Alternative would decrease the ADT. Therefore, the traffic and circulation impacts that would occur with the proposed project would be slightly reduced with this Alternative.

The Reconfiguration Alternative would be environmentally superior to the proposed project regarding traffic and circulation impacts due to slightly reduced traffic volumes.

Air Quality

Table 5.6-5 presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from grading, excavation, and construction activities would also occur with the Reconfiguration Alternative. Comparatively, the construction-related air quality impacts would be slightly reduced compared to the proposed project, given construction would be approximately 3,000 fewer square feet than the proposed project. Therefore, the short-term air quality impacts that would occur with the proposed project would also occur under this Alternative, although slightly reduced.

The proposed project would not exceed the GBUAPCD's emissions thresholds, as indicated in Table 5.6-6. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the

Reconfiguration Alternative, although to a lesser degree than the proposed project. This Alternative would result in slightly fewer vehicle trips, as compared to the proposed project. With this Alternative, mobile pollutant emissions would be proportionately reduced, as compared to the proposed project.

The Reconfiguration Alternative would be environmentally superior to the proposed project regarding air quality impacts due to slightly reduced mobile source emissions.

Greenhouse Gas Emissions

As indicated in [Table 5.7-1](#), project implementation would result in 801.28 MTCO₂eq/yr, which is below the 900 MTCO₂eq/yr threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the Reconfiguration Alternative, although to a slightly lesser degree than the proposed project as a result of fewer ADT. The Alternative's combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective, although to a lesser degree than the proposed project.

The Reconfiguration Alternative would be environmentally superior to the proposed project regarding GHG emissions, due to decreased mobile emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from grading, excavation, and construction activities would also occur with the Reconfiguration Alternative due to construction of the proposed buildings and improvements at the project site. Comparatively, this Alternative's construction-related noise impacts would be slightly reduced compared to the proposed project, given this Alternative would result in slightly less building square-footage than the proposed project. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative, although to a slightly lesser extent.

As shown in [Table 5.8-4](#), existing noise within the area from mobile noise ranges from 51.2 dBA to 65.1 dBA at 100 feet from the roadway centerline. Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Reconfiguration Alternative to a slightly lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be slightly reduced compared to the proposed project, given this Alternative would decrease the ADT. Therefore, the mobile source noise impacts that would occur with the proposed project would be slightly reduced with this Alternative.

Project implementation would result in less than significant impacts from stationary noise sources with implementation of recommended mitigation. The increased noise from stationary sources from the proposed project, including mechanical equipment, community center, ice rink, recreation zone, park playground, active outdoor recreation area, and parking, would also occur with this Alternative, but to a lesser degree. With the Reconfiguration Alternative, approximately 3,000 square feet fewer support/community center space would be developed, generating fewer stationary noises than the

proposed project. However, the project's larger structure would potentially not provide the same amount of noise attenuation to residential uses to the north. Further, the proposed facility for this Alternative would be sited approximately 30-feet west of the project's configuration (which would be closer to existing sensitive receptors). The surface parking lot would also be shifted approximately 20 feet north closer to the existing residential uses to the north. Thus, these potential stationary and intermittent noise sources would be relocated closer to existing sensitive receptors, creating increased noise impacts.

Thus, the Reconfiguration Alternative would be environmentally inferior to the proposed project regarding noise.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading, excavation, and construction activities. Implementation of the Reconfiguration Alternative would similarly result in short-term impacts to water quality. Comparatively, this Alternative's short-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar grading footprint.

The proposed project would result in long-term operational impacts to water quality and quantity, as permeable surfaces would be replaced with impermeable surfaces, new community multi-use facilities would operate on the project site, and an increase in traffic volumes would occur. Implementation of the Reconfiguration Alternative would result in long-term operational impacts to water quality and quantity. Comparatively, the long-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar development (although slightly reduced).

The Reconfiguration Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

ABILITY TO MEET PROJECT OBJECTIVES

The Reconfiguration Alternative would meet most of the project's basic objectives. The existing ice rink and community facilities would be relocated closer to public corridors/trails within the Town. A complimentary community center and active outdoor area that would provide recreational opportunities for all seasons would be created, although to a lesser extent than the project. A covered roof structure over the Town's ice rink facility would also be provided.

7.5 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

Table 7-1, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-1 indicates the No Project Alternative is the environmentally superior alternative, as it would avoid or lessen the majority of impacts associated with development of the proposed project. According to CEQA Guidelines Section 15126.6(e), “if the environmentally superior alternative is the “no project” alternative, the EIR

shall also identify an environmentally superior alternative among the other alternatives.” Accordingly, an environmentally superior alternative among the other alternatives is identified below.

**Table 7-1
Comparison of Alternatives**

Sections	No Project	Civic Center Parcel Alternative Site Alternative	Bell Shaped Parcel Alternative Site Alternative	Reconfiguration Alternative
Land Use and Relevant Planning	▲	▲	=	=
Aesthetics/Light and Glare	▼	▼	=	=
Biological Resources	▼	▼	▲	=
Cultural Resources	▼	▼	▼	=
Traffic and Circulation	▼	=	=	▼
Air Quality	▼	=	=	▼
Greenhouse Gas Emissions	▼	=	=	▼
Noise	▼	▼	=	=
Hydrology and Water Quality	=	▼	=	=
▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ▼ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.				

It should be noted that no significant and unavoidable impacts have been identified for the proposed project. However, the environmentally superior alternative would be the Civic Center Parcel Alternative Site Alternative, as impacts are less than the proposed project. As concluded in the analysis presented above, the Civic Center Parcel Alternative Site Alternative would meet some of the project’s basic objectives. The existing ice rink would be relocated closer to public corridors/trails. A covered roof structure over the Town’s ice rink facility would also be provided. However, a complimentary community center and new active outdoor recreational opportunities for all seasons would not be created. Further, implementation of this Alternative would preclude the Town from placing future government facilities at this property. The proposed project would not meet the Town’s goals and objectives for a government facilities at this location.