

July 2019

ADDENDUM TO 2014 HOUSING ELEMENT INITIAL STUDY/NEGATIVE DECLARATION

Town of Mammoth Lakes

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Town of Mammoth Lakes

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1. Addendum to an Adopted Initial Study/Negative Declaration

1.1 BACKGROUND

Under the requirements of state law, every city and county in California must prepare a safety element and housing element as part of its general plan. The safety element of the general plan must be updated to meet the legal requirements set out by Senate Bill (SB) 1241 and SB 379, and the timing of this required update must be coordinated with the housing element update. SB 1241 requires a safety element to address wildfire hazards. Furthermore, in accordance with Government Code §65302(g)3, revisions to a housing element that occur on or after January 1, 2014, also require the safety element to be reviewed and updated to address the risk of fire for land classified as State Responsibility Areas (SRAs) and land classified as Very High Fire Hazard Severity Zones (VHFHSZs). In addition, Government Code §65302(g)4 requires a jurisdiction to conduct a vulnerability assessment that identifies the risks that climate change poses to the local jurisdiction. Moreover, the housing element must document in detail existing conditions and projected needs in accordance with state housing law provisions, and must also contain goals, policies, programs, and quantified objectives that address housing needs over the next eight-year period.

On July 1, 2014, the Town adopted the IS/ND SCH#2014032067 (2014 IS/ND), which allowed for adoption of the current Housing Element. The Housing Element is a policy document that does not result in physical changes to the environment but encourages the provision of housing of different incomes within the Town. None of the program actions in the proposed project would result in physical changes to the environment. All development in the Town is required to comply with the General Plan, zoning ordinance, and Town development standards. In addition, any discretionary actions require independent and project-specific environmental review. The Housing Element Update does not propose changes to land use designations or zoning districts. The Housing Element Update includes a number of policies and programs which include updates to the Town's Zoning Code and Housing Ordinance.

On May 23, 2007, the Town adopted the 2007 Final Program Environmental Impact Report SCH#2003042155 (2007 FPEIR) for the Town's 2005 General Plan Update, which allowed for the adoption of the current Public Health and Safety Element. Moreover, in October 2016, a Final Environmental Impact Report (2016 FEIR) was prepared for the Land Use Element/Zoning Code Amendments and Mobility Element Update which provided Mitigation Measure TSMM 4.G-1.A which states the Town should undertake actions when applicable to reduce the risk of wildfires. Similar to the Housing Element, the Public Health and Safety Element does not result in physical changes to the environment but encourages to improve the quality of life, safety, and awareness of its residents and visitors. None of the program actions or adaptation actions in the proposed project would result in physical changes to the environment, land use, or other physical characteristics. It is required that all development in the Town comply with the General Plan, zoning ordinance, and Town

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development standards. Discretionary actions require independent, project-specific environmental review. Additionally, the program actions and adaptation actions of the Public Health and Safety Element Update require cooperation between agencies.

The proposed 2019-2027 Housing Element will serve as the Town's guiding policy document that meets future needs of housing for all of the Town's economic sections and addresses affordable housing. The proposed 2019-2027 Housing Element and Public Health and Safety Element would replace the existing 2014-2019 Housing Element and Public Health and Safety Element. In this Addendum, the 2019-2027 Housing Element and the Public Health and Safety Element are considered together as the proposed project.

A copy of this document, and all supportive documentation, may be reviewed or obtained at the Town of Mammoth Lakes Planning Division office, 437 Old Mammoth Road, Suite 230, Mammoth Lakes, CA 93546.

1.2 PROJECT SUMMARY

Government Code, Section 65588(a)(2) “Review and Revision” requires that a newly proposed 2019-2027 Housing Element review the goals and policies of the previous housing element, and report on the attainment and disposition of the goals and policies. In many instances, the goals and policies from the previous Housing Element are continued through to the proposed 2019-2027 Housing Element. This analysis begins on page 5-2 of the proposed 2019-2027 Housing Element. Table 1-1 includes the changes in goal or program actions between the existing Housing Element and the proposed 2019-2027 Housing Element.

Table 1-1 Summary of Program Action Changes Between Existing Housing Element and 2019-2027 Housing Element

Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<p>Action H.1.A.1. Maintain an up to date, GIS-based inventory of potential sites available for future housing development, and provide this information to Mammoth Lakes Housing, Inc. and prospective developers.</p> <p>Timeframe: Ongoing</p>	The Town contracts with Mono County IT to keep the GIS database functioning and up-to-date.	Continue
<p>Action H.1.A.2. As part of the annual planning report to the Town Council, provide an update on progress to meeting the Housing Element, to ensure that adequate sites remain available to meet the RHNA.</p> <p>Timeframe: Annually, ongoing</p>	The Town annually completes the Annual Progress Report and submits them to the California Housing and Community Development Department. The Town ensured that adequate sites remained available to meet the RHNA over the past planning period.	Continue
<p>Action H.1.A.3. Ensure that updates and amendments to existing and future Master Plans and Specific Plans provide development capacity and supporting policy to help meet the Town’s housing needs.</p> <p>Timeframe: Ongoing</p>	As master plans, specific plans, and updates are processed, the Community and Economic Development Department, Planning and Economic Development Commission, and Town Council Evaluate and ensure adequate development capacity and policy is included to meet housing needs.	Continue
<p>Action H.1.B.1 As part of the amendments to the Housing Ordinance, analyze the implications and benefits of excluding required on-site affordable and workforce housing from density or floor area ratio (FAR) calculations in all mixed-use projects in the Commercial Zones, and lodging and residential projects in the Residential Multi-Family 2 Zone. Any exclusion of such units from density calculations would require findings to be made that the total project density did not result in unacceptable site plan, character, livability or environmental impacts. If adopted, this provision shall only be applicable to projects ineligible for Town or State housing density bonuses.</p> <p>Timeframe: 2014-2015</p>	The Town analyzed the implications and benefits of excluding required on-site affordable and workforce housing from density or floor area ratio (FAR) calculations in all mixed-use projects in the Commercial Zones, and lodging and residential projects in the Residential Multi-Family 2 Zone as part of the Housing Ordinance Update in 2015. It was determined that it was not appropriate to include this in the updated Housing Ordinance due to a Zoning Code update that established maximum FAR and eliminated maximum residential	Delete

2. CEQA Analysis

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Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
	density within the commercial zoning districts.	
<p>Action H.1.B.2 Encourage housing development as part of infill and mixed-use development within the Downtown, Old Mammoth Road, and Mixed Lodging/Residential Commercial Zones, which is now allowed by right with the adoption of the Zoning Code Update in 2014. Outreach to property owners, developers, and brokers to discuss infill and mixed-use development opportunities in these Commercial Zones.</p> <p>Timeframe: Ongoing</p>	<p>The Town's commercial zoning districts allow mixed-use projects and workforce housing as permitted uses. In 2017, the Town held numerous public workshops and meetings to discuss the potential for mixed-use development and multi-family housing in the commercial zoning districts (Downtown Revitalization Action Plan).</p>	<p>Continue</p>
<p>Action H.1.C.1. As part of Housing Ordinance amendment, reflect the density bonus provisions of General Plan policy L.2.D, ensuring the amendment remains consistent with State density bonus law.</p> <p>Timeframe: 2014</p>	<p>The Town implemented General Plan Policy L.2.D – compliance with density bonus requirements in 2015.</p>	<p>Delete</p>
<p>Action H.1.D.1. As part of the Housing Ordinance anticipated in 2014, develop criteria, standards and thresholds by which Alternate Housing Mitigation Plans (AHMPs) can be assessed and approved.</p> <p>Timeframe: 2014</p>	<p>The Housing Ordinance provides a menu of options for developers to choose from to mitigate his/her housing impact. Requirements are outlined for each of those options in the Housing Ordinance. Examples of on-site provision of units requirements, include but are not limited to, ensuring the affordability level(s) of the unit(s) comply with those established by council resolution, and ensuring that on-site units shall be for-sale units unless the builder/developer chooses the rental alternative specified in Section 17.136.090 of the Town's Municipal Code. In 2015, the Town created new standards to assess and approve AHMPs in the Zoning Code Section 17.136.080.</p>	<p>Amend to reflect updated Housing Ordinance (The 2015 Updated Housing Mitigation Ordinance updated Chapter 17.136 of the Town's Municipal Code to include a menu-based format that allows developers to choose a desired method for mitigation) and continue</p>
<p>Action H.1.E.1. Continue to apply zoning standards that allow for the following types of special needs housing in Mammoth Lakes.</p> <ul style="list-style-type: none"> ▪ The 2014 Zoning Code update permits emergency shelters by right in the Old Mammoth Road district without discretionary design review. ▪ Transitional and Supportive housing are defined in the Zoning Code Update and treated as typical residential uses. ▪ Residential care and assisted living facilities are permitted in the Old Mammoth Road and Mixed Lodging/Residential districts with a ministerial permit, as outlined in the Zoning Code Update. ▪ Group living quarters, including clean and sober facilities, rooming and boarding houses, dormitories and other types of organizational housing, private residential clubs, and 	<p>In 2014 the Town completed zoning amendments as shown below to address the following:</p> <ul style="list-style-type: none"> ▪ Emergency shelters, 17.88.020 ▪ Transitional and supportive housing, 17.88.020 ▪ Assisted living facilities, 17.24.020 ▪ Group living facilities included in the zoning code (Tables 17.20.020 and 17.20.030). 	<p>Amend to address accomplishments and continue</p>

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Table 1-1 Summary of Program Action Changes Between Existing Housing Element and 2019-2027 Housing Element

Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<p>extended stay hotels intended for long-term occupancy (30 days or more), which are included in the Zoning Code Update. Timeframe: Ongoing</p>		
<p>Action H.1.E.2. Work with the Kern Regional Center to identify any outstanding housing needs for its clients within the Mammoth Lakes community, assist in identifying available housing that meets those criteria, and consider a rental assistance program to fill the gap between income levels and the cost of housing for persons with developmental disabilities. Timeframe: 2014 and ongoing</p>	<p>The Town has not worked with the Kern Regional Center to identify outstanding housing needs for their clients and has not established a rental assistance program. However, the Town does have an adopted reasonable accommodation procedure. Two disabled individuals have received reasonable accommodation in the last year and one disabled individual has received a first-time homebuyer loan. Mono County is working on a supportive housing project for people with behavioral disabilities which could also serve some people with developmental disabilities. Mammoth Lakes Housing has had discussions with the Kern Regional Center about trying to secure Department of Development Services (DDS) funding for conversion of a commercial property/building they own to residential which would include some units reserved for those with developmental disabilities.</p>	<p>Continue</p>
<p>Action H.1.E.3. Collaborate with the Kern Regional Center to implement an outreach program that informs residents within Mammoth Lakes on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, posting information about available services on the Town's website, and providing housing- and services-related educational workshops for individuals and families. Timeframe: 2014 and ongoing</p>	<p>The Town has not collaborated with Kern Regional Center to implement an outreach program for persons with disabilities. However, the Town does have an adopted reasonable accommodation procedure. Two disabled individuals have received reasonable accommodation in the last year and one disabled individual has received a first-time homebuyer loan. Mono County is working on a supportive housing project for people with behavioral disabilities which could also serve some people with developmental disabilities.</p>	<p>Continue</p>
<p>Action H.1.E.4. The Town shall continue to ensure individuals with disabilities equal access to housing, pursuant to the rules, policies,</p>	<p>The Town ensures equal access to housing for individuals with disabilities through implementation</p>	<p>Continue</p>

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Table 1-1 Summary of Program Action Changes Between Existing Housing Element and 2019-2027 Housing Element

Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<p>and procedures in Chapter 17.80 (Reasonable Accommodation) of the Municipal Code. Timeframe: 2014 and ongoing</p>	<p>of Municipal Code 17.80, Reasonable Accommodation. The Town Planning Department is committed to reviewing and processing applications for Reasonable Accommodation to provide appropriate relief from development standards that might create a barrier to providing housing for a disabled or special needs person.</p>	
<p>Action H.2.A.1. Transition to dedicating one percentage point of all revenues from Transient Occupancy Tax to fund affordable and workforce housing programs, and the work of Mammoth Lakes Housing, Inc., the Town, and other agencies to meet housing needs. Timeframe: Annual: 2014-2019</p>	<p>The Town Council annually dedicates TOT revenues to fund housing programs. In the 2017, the annual dedication of TOT revenues to fund housing programs was 0.85 points (of 13 points).</p>	Continue
<p>Action H.2.A.2. Pursue available grant funds, in cooperation with Mammoth Lakes Housing, Inc. and other partners, to support and facilitate the provision of workforce and affordable housing. In particular, the Town will seek State and Federal funding specifically targeted for the development of housing affordable to extremely low-income households, such as the Local Housing Trust Fund program and any remaining Proposition 1-C funds. Timeframe: Ongoing</p>	<p>The Town and Mammoth Lakes Housing, Inc. continue to pursue grant funds to support housing programs. A HOME grant was awarded in 2014 for first time homebuyer assistance and rehabilitation; and a CDBG grant was awarded in 2014 for upgrades to the Glass Mountain Apartments, and homebuyer assistance and single unit rehabilitation. This 2014 CDBG grant is now closed, and the Town has a new CDBG grant and a HOME grant for first time homebuyer assistance.</p> <p>An application for CDBG grant funding was submitted by the Town and Mammoth Lakes Housing, Inc., in November 2017 to provide 10 units of housing to lower income households. First-time homebuyer assistance is provided through ongoing grant reuse funds and additional HOME grant funds in 2017. The Town received a 2016 HOME award for home buyer assistance and a 2017 CDBG award for home buyer assistance and a rehabilitation program.</p>	Continue
<p>Action H.2.A.3. Develop and adopt a Community Housing Strategy in collaboration with Mammoth Lakes Housing, Inc. that promotes housing construction and conservation necessary to meet the Town's affordable and workforce housing needs on a short-,</p>	<p>The Town Council reviewed, discussed and accepted the Housing Action Plan: Live, Work, Thrive on December 6, 2017. The establishment of the Foundational</p>	Delete

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Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<p>medium- and long-term basis. The 2011 Housing Needs Assessment conducted by Mammoth Lake Housing, along with this Housing Element, will be used to inform the Community Housing Strategy. The Housing Strategy shall provide for periodic updates of short- and medium range priorities and program objectives based on current data and conditions. The Housing Strategy shall include a broad range of programs and activities, including:</p> <ul style="list-style-type: none"> ▪ Acquisition of land for affordable housing. ▪ Direct construction of new affordable and workforce housing units. ▪ Participation in joint projects with private developers, the Town, and local agencies to develop housing. ▪ Homebuyer assistance loans and grants. ▪ Education and outreach concerning affordable and workforce housing opportunities. ▪ Rental housing assistance. ▪ Review of Alternate Housing Mitigation Plan proposals. ▪ Monitoring of deed restricted units. ▪ Funding strategies to guide how the Housing Strategy will be financed and prioritized. ▪ An Administration component to guide roles and responsibilities for program implementation. <p>Timeframe: 2014</p>	<p>Structure of the plan and initial implementation of the action strategies is a part of the Town's current work program.</p>	
<p>Action H.2.A.4. Recognizing the housing burdens of extremely low-income households, the Town will implement a program to monitor the construction and rehabilitation of housing to meet the needs of the ELI population as identified in the 2011 Housing Needs Assessment.</p> <p>Timeframe: 2015</p>	<p>The Town has not implemented a monitoring program for the construction and rehabilitation of housing for extremely low-income persons. The Town targets CDBG funds to support projects that serve extremely low-income individuals when it can.</p>	<p>Amend to update the Needs Assessment date and continue</p>
<p>Action H.2.B.1. Amend and adopt a revised Housing Ordinance that reflects the 2009 Interim Housing Policy, incorporates refinements to meet legal mandates, addresses aspects not fully articulated in the Interim Housing Policy; and provides needed clarification. The amended Housing Ordinance shall meet the objectives outlined in Policy H.2.B, and should include the following components:</p> <ul style="list-style-type: none"> ▪ A provision that allows new residential projects to provide on-site below market-rate deed-restricted affordable or workforce housing units. The specific requirement (e.g., AMI level) shall be based on documented community housing needs and reviewed and updated on a regular basis. ▪ A workforce housing mitigation requirement such as a fee to contribute to affordable housing production. ▪ A list of project types exempted from housing mitigation requirements. 	<p>The Town adopted a revised Housing Ordinance in June 2015 that addressed the objectives outlined in Policy H.2.B, including:</p> <ul style="list-style-type: none"> ▪ Provisions for new, below market-rate, deed-restricted residential projects for affordable and workforce housing. ▪ Fees to contribute to affordable housing production in the Town. ▪ List of housing types exempt from housing mitigation requirements. 	<p>Delete</p>

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Table 1-1 Summary of Program Action Changes Between Existing Housing Element and 2019-2027 Housing Element

Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<ul style="list-style-type: none"> ▪ Provisions defining Alternate Housing Mitigation Plans for projects that wish to propose alternative mitigation. ▪ Specification of the means and method by which in-lieu fees, affordability levels, unit types, tenure (if legally permissible), livability criteria, and other pertinent criteria not otherwise dictated by the Housing Ordinance shall be established, maintained and updated. ▪ Density bonus provisions pursuant to State Housing Density Bonus law and to Town General Plan policies and related Housing Element policies. ▪ A definition of and provisions for ensuring the "livability" of workforce housing units. <p>Timeframe: 2014</p>	<ul style="list-style-type: none"> ▪ Definitions for Alternate Housing Mitigation Plans. ▪ Density bonuses. ▪ Definitions of "livability" for workforce units used for mitigation. <p>The Town also completed a needs assessment in 2017 as part of the Mammoth Lakes Community Action Plan.</p>	
<p>Action H.2.D.1. As part of the Housing Strategy, work with Mammoth Lakes Housing, Inc. to acquire and renovate units that can be added to the workforce housing inventory. Program creation will include an evaluation of program costs, benefits, and opportunities.</p> <p>Timeframe: 2015</p>	<p>In 2017, the Town included action strategies addressing conversion of existing units to ownership or rental opportunities for the workforce in the Housing Action Plan: Live, Work, Thrive. No units have been converted yet.</p>	<p>Continue</p>
<p>Action H.2.E.1. As part of the Housing Strategy study potential strategies to incentivize and encourage upgrades of existing multi-family rental properties, and how code enforcement techniques may be improved and used to correct building violations that pose a threat to residents' safety or wellbeing.</p> <p>Timeframe: 2015</p>	<p>In 2014, a CDBG grant application for code enforcement was submitted in 2014, though was not awarded. CDBG grant funding was awarded in 2014 to assist in the financing of rehabilitation of 1 - 4-unit properties and rehabilitation of the Glass Mountain Apartments. The 1 - 4-unit rehabilitation grant was managed by MLH. This grant is now closed, and additional strategies have been incorporated in the Housing Action Plan. Mammoth Lakes Housing continues to pursue funding for these activities.</p> <p>The Town's 2017 CDBG award has funding for this program, however no households have been funded to date. MLH is actively working to set up the grant and rehabilitation procedures, in order to market the program. Past interest by landlords did not result in rehabilitation due to the Rent Restriction requirement.</p>	<p>Continue</p>
<p>Action H.2.G.1. As part of the Housing Strategy work with Mammoth Lakes Housing, Inc. to study and develop procedures that will avoid the inadvertent loss of deed-restricted units, including:</p>	<p>The Town has worked with Mammoth Lakes Housing and implemented a new deed restriction instrument for ownership units that</p>	<p>Amend to reflect progress and continue</p>

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**Table 1-1 Summary of Program Action Changes Between Existing Housing Element and 2019-2027
Housing Element**

Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<ul style="list-style-type: none"> ▪ Improved structuring of deed restriction agreements so as to ensure their long-term availability to the local workforce. ▪ Development of a more effective monitoring program for existing deed restricted units, including a system of enforcement and penalties for illegal conversion of deed-restricted units. <p>Timeframe: 2014-2015</p>	<p>helps to alleviate some issues encountered with previous versions of the instrument. No deed restriction instrument for rentals has been put in place. This has been addressed on rental projects on a case-by-case basis. A Revolving Loan Fund using a portion of the Town's Housing Mitigation Fee Fund has been successfully used to buy back deed restricted units. Mammoth Lakes Housing has also worked with Mono County using the County's revolving fund to maintain ownership unit deed restrictions in Mammoth Lakes.</p>	
<p>Action H.2.G.2. Continue to work with Mammoth Lakes Housing, Inc. and the Revolving Loan Fund (RLF) to assist in buying back existing deed restricted units in an effort to maintain these units. Explore the expansion of funding limits on the RLF and other possible funding sources such as the restoration of the one-percent of Transient Occupancy Tax (TOT) to housing in an effort to help ensure no existing deed restricted units are lost.</p> <p>Timeframe: 2015</p>	<p>The Revolving Loan Fund is used annually to buy back deed restricted units. In 2014, two units were preserved; in 2015, two units were preserved through the RLF; in 2016, one unit was preserved through the RLF; and in 2017, one unit was preserved through the RLF.</p>	<p>Continue</p>
<p>Action H.2.H.1. Use the results of the 2011 Housing Needs Assessment conducted by Mammoth Lakes Housing, Inc. to target efforts aimed at increasing the supply of housing for winter and summer seasonal employees, including cooperative efforts with MMSA and other major local employers to house their employees.</p> <p>Timeframe: Ongoing</p>	<p>A Housing Needs Assessment update was completed in July 2017, as a precursor to preparing a Housing Action Plan. The Housing Action Plan was accepted by Town Council in December 2017.</p> <p>The Town has had discussions with Mammoth Mountain about building out their property on Arrowhead Road.</p> <p>In 2017, one unit was purchased with the Town's revolving loan fund and two units were purchased with the County revolving loan fund.</p> <p>In 2018, one unit was purchased with the revolving loan fund.</p> <p>Units are also preserved through the direct transfer from seller to buyer, with the execution of the deed restriction facilitated by MLH. One unit was preserved this way in 2018.</p>	<p>Amend to update Housing Needs Assessment date and continue</p>

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Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
<p>Action H.3.A.1. As part of the Housing Strategy, work with Mammoth Lakes Housing, Inc., to develop and adopt minimum design and livability standards for affordable and workforce housing units, including tailored standards for different unit types and tenure. Standards should address aspects such as minimum quality of fixtures and furnishings; indoor and outdoor open space; storage space, energy efficiency, and resident amenities. The livability standards adopted as part of the Interim Housing Policy are included in the Housing Ordinance update that is anticipated to be adopted in 2014. These livability requirements may be updated based on the Housing Strategy.</p> <p>Timeframe: 2014</p>	<p>In May 2015, the Town adopted minimum design and livability standards for affordable and workforce housing units.</p>	<p>Delete</p>
<p>Action H.4.B.1. Adopt a resolution waiving a proportion of the application processing fees for developments in which at least five percent of units are affordable to extremely low-income households. To be eligible for fee waiver, the units shall be affordable by affordability covenant. The waiving or reduction of service mitigation fees may also be considered when an alternative funding source is identified to pay these fees. The Town anticipates amending the Municipal Code fee waiver section to include this program concurrently with the Housing Ordinance update.</p> <p>Timeframe: 2014-2015</p>	<p>The Town has not yet adopted a resolution which waives part of the application processing fees for developments that feature affordable housing to extremely low-income households in five percent or more of its housing units. This was not identified as a priority amongst action plan strategies at the recent Housing Summit. The Town will continue to work towards implementing this action as resources allow.</p>	<p>Continue</p>
<p>Action H.4.E.1. Continue to monitor the Town's DIF ordinance to assure that impact fees do not create an economic impediment that deters construction of housing needed to meet the Town's Regional Housing Needs Allocation or workforce housing objectives.</p> <p>Timeframe: 2014 and ongoing</p>	<p>In 2015 the Town updated the DIF ordinance, which resulted in lower fees, to ensure that RHNA or workforce targets are being fulfilled. The ordinance exempts non-transient market-rate rental apartments and deed-restricted rental or for-sale workforce housing units from impact fees in all zones.</p>	<p>Continue</p>
<p>Action H.5.B.1. Provide information regarding fair housing practices at the Town of Mammoth Lakes offices and website, the Mammoth Lakes Community Center and Library, and the Mono County offices located in Mammoth Lakes.</p> <p>Timeframe: 2014 and ongoing</p>	<p>The Town began providing information regarding fair housing practices in 2014. Complaints received are referred to and handled by MLH. This information continues to be provided and available through both the Town and MLH websites and at the respective offices.</p>	<p>Continue</p>
<p>Action H.5.C.1. Develop a process for addressing Fair Housing inquiries and complaints, including referral of complaints concerning deed-restricted units to Mammoth Lakes Housing, Inc. and other complaints to the California Department of Fair Housing and Equal Opportunity. As part of the process, the Town shall investigate potential partnerships with rural or other fair housing organizations that may be able to provide additional resources to the Town. The Town will ensure that information regarding the Town's process of</p>	<p>In 2015 the Town and MLH established a process to address fair housing complaints and inquiries. Complaints are handled by MLH. The Town plans to establish a page on their website to house fair housing information. MLH held two landlord-tenant rights workshops hosted by</p>	<p>Amend to reflect progress and continue</p>

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Existing Housing Element Program Actions	Achievement	Continue/Modify/Delete
addressing complaints is included in the public information distributed regarding fair housing practices (Action H.5.B.1). Timeframe: 2014 and ongoing	CA Rural Legal Aid in September 2017.	
Action H.6.B.1. The Town will enforce the California Green Building Standards Code, Title 24, Part 11 of the California Code of Regulations (CALGreen) which became effective January 1, 2014. Timeframe: Ongoing	The Town enforces the 2016 California Building Code requirements.	Continue
Action H.6.C.1. Work with Inyo Mono Advocates for Community Action (IMACA) and Mammoth Lakes Housing, Inc. to increase the number of weatherization retrofits and other upgrades of owner occupied and non-transient rental housing units in Mammoth Lakes. Strategies to accomplish this may include development of an informational flyer or brochure, posting information on the Town's website, and direct outreach to property owners. Timeframe: Ongoing	A HOME grant was awarded in 2014 for first-time homebuyer assistance with or without rehabilitation. IMACA's Weatherization Program was operational in 2015, but not in 2014 due to staffing constraints. IMACA has funding available for this program and Mammoth Lakes Housing and the Town provide information to the public as applicable. The Town continues to work with Mammoth Lakes Housing on permits for upgrades to existing non-transient housing. 2017 CDBG award for owner and investor rehabilitation is currently being set up.	Continue

Except as shown in Table 1-1, all existing Housing Element program actions will remain in place. The following 12 program actions are new to the Town and included in the proposed 2019-2027 Housing Element.

- Action H.1.E.4:** The Town shall review its zoning code to ensure compliance with AB 2162 related to allowing supportive housing. The zoning code will be reviewed to assess whether supportive housing is allowed without discretionary review in all zones that allow multifamily housing or mixed-use development, including nonresidential zones as applicable. If it is determined that the allowed uses in the zoning codes are not in compliance with AB 2162 the Town will revise the allowed uses along with corresponding development standards as detailed in 2162.
- Action H.1.E.5:** The Town shall review its zoning code to determine whether updates to zoning are needed to comply with the state Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6). The Act calls for the Zoning Ordinance to treat employee housing (including farm worker housing) that serves six or fewer persons as a single-family structure and permitted in the same manner as other single-family structures of the same type in the same zone (Section 17021.5). The Zoning Ordinance must also treat employee housing consisting of no more than 12 units or 36 beds as an agricultural use and

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permitted in the same manner as other agricultural uses in the same zone (Section 17021.6) in zones where agricultural uses are permitted.

3. **Action H.1.F.1:** Seek funding to continue the planning process for The Parcel site and process entitlements for the planned development. Continue to engage the community during the master planning process. Housing should be developed on The Parcel during the housing element planning period.
4. **Action H.2.A.3:** The Town will work with MMSA on a pilot program to develop a model policy for employers to provide first and last rental deposit which would be re-paid through payroll deduction. Outreach efforts will be made with employers to provide education and to gather information to help create the program.
5. **Action H.2.A.4:** The Town will gather research and data to support a program that builds upon the existing Homebuyer Assistance program through Mammoth Lakes Housing, Inc. to assist moderate and middle-income households, up to 200% AMI with down payment assistance or assistance with second mortgages. The Town will also work with employers to assist employees and learn from existing employers with current programs (MMSA, Water District, MLH assistance).
6. **Action H.2.A.5:** Continue to explore placing a dedicated local tax initiative on the ballot in Mammoth Lakes to fund affordable housing. If passed the tax would provide a dedicated local funding source for affordable housing.
7. **Action H.2.A.6:** The Town will work to maintain the affordability of mobile homes in Mammoth Lakes by looking for funding sources for improvement of mobile homes and mobile home parks. The Town will reach out to mobile home park owners to look for ways that they can work together to maintain mobile homes as an affordable housing type in Mammoth Lakes.
8. **Action H.2.D.2:** As part of implementing the Community Housing Action Plan, explore the possibility of instituting a long-term rental housing inspection program to ensure proper maintenance and safety of tenants in long-term rentals in Mammoth Lakes.
9. **Action H.2.E.2:** Establish a landlord/tenant matching program to increase opportunities for seasonal employees to stay year-round. Could also include a job matching component.
10. **Action H.4.D.1:** Accessory dwelling units (ADU) can be an affordable housing option and can help meet the needs of many residents in the Town. To ensure consistency with state law (Assembly Bill 2299/Senate Bill 1069 and Assembly Bill 494/Senate Bill 229) and implement community goals, the Town shall review standards and revise as necessary to facilitate the development of ADUs.
11. **Action H.4.D.2:** Promote development of accessory dwelling units (ADU) by increasing awareness regarding the ability to create accessory dwelling units on single-family residential properties, exploring variances (e.g. side yard setbacks) to make it easier to fit ADUs on some lots, and establishing a goal for a desired number of ADUs to be built. The Town will also incentives to develop ADUs in exchange for long-term rental contracts.

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12. **Action H.4.E.2:** To address constraints to the availability of long-term rental housing associated with short-term rentals the Town will establish a program identifying methods to mitigate the issue. Components of the program may include waiving fees for illegal short-term rentals owners who commit to restricting their properties as long-term rentals, creating an impact fee levied on short-term rentals that would go towards preserving or creating long-term rental housing, and conducting a nexus study to further study how short-term rentals are impacting the rest of the housing market.

Furthermore, Table 1-2, *Summary of Public Health and Safety Element Changes*, indicates the changes in program actions between the existing Public Health and Safety Element and the updated Public Health and Safety Element.

Table 1-2 Summary of Public Health and Safety Element Changes

Public Health and Safety Element Program Actions	Environmental Impact	Continue/Modify/Delete
Action S.1.A.1. Work with Mono County Office of Education and other organizations to support and promote child care facilities and services. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. This Program Action would not result in an environmental impact as supporting and promoting child care facilities does not have an adverse impact on the environment.	Continue
Action S.1.B.1. Provide emergency operation centers. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The provision of emergency operation centers would not result in an environmental impact; potential future development would be required to complete the CEQA process.	Continue
Action S.1.E.1. Amend the Zoning Code to enable state-mandated incentives for child care facilities. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. Amending the Zoning Code to enable incentives for child care facilities would not result in an environmental impact. The Zoning Code provides provisions for development, and does not result in the approval of development.	Continue
Action S.2.A.1 Develop and maintain a Municipal Operation Plan that includes sites for storage and/or disposal of hazardous material, trash, propane, snow, and forestry products. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The development and maintenance of a Municipal Operation Plan would clearly outline locations for storage and/or disposal of various materials, and therefore, would not have an impact on the environment.	Continue
Action S.2.D.1 Use foot and bicycle patrols to increase community policing. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The use of foot and bicycle patrols to increase community policing would not result in an environmental impact, but instead increase safety in the Town.	Continue
Action S.2.D.2. Promote establishment and/or expansion of neighborhood watch programs for residential areas. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. Establishing and/or expanding neighborhood watch programs in residential areas would not result in an environmental impact, but instead increase public safety.	Continue

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Public Health and Safety Element Program Actions	Environmental Impact	Continue/Modify/Delete
<p>Action S.2.D.3. Continue enforcement of the California Motor Vehicle Code, local speed controls, and chain controls. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The continued enforcement of California Motor Vehicle Code and applicable controls would not result in an environmental impact, but instead would increase public safety.</p>	<p>Continue</p>
<p>Action S.2.D.4. Reduce criminal behavior in the community by involving the community and coordinating with other agencies. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. Coordinating with the community and other agencies in an effort to reduce criminal behavior would not result in an environmental impact.</p>	<p>Continue</p>
<p>Action S.3.H.1. The Town shall identify limits of avalanche run-out areas and potential avalanche hazards areas that may impact existing or new development. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. This Program Action would increase public safety as a result of potential avalanche hazards, and no environmental impact would occur.</p>	<p>Amend to reflect updates to Action language and Action number, and continue</p>
<p>Action S.3.I.1. Post warning signs on Town roads subject to avalanche hazards. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The posting of warning signs does not result in an environmental impact; this Program Action would increase public safety.</p>	<p>Amend to reflect update to Action number and continue</p>
<p>Action S.3.I.1. Minimize soil erosion and slope instability by amending Municipal Code to include advances in construction techniques. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. This Program Action would not result in an environmental impact. Construction techniques to minimize geological and soil impacts would increase public safety.</p>	<p>Delete</p>
<p>Action S.3.K.1. Inform residents and businesses regarding earthquake preparedness and response by coordinating with other agencies to promote public education efforts. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. Informing the public on earthquake preparedness and response, by coordinating with other agencies, would not impact the environment.</p>	<p>Amend to reflect update to Action number and continue</p>
<p>Action S.3.R.1. Specify, develop and regulate sites for safe collection of hazardous wastes. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The specification, development, and regulating of sites for hazardous wastes collection would have no impact on the environment; project-specific development would be required to complete the CEQA process.</p>	<p>Continue</p>
<p>Action S.3.R.2. Educate public about proper use and disposal of hazardous materials and waste through coordination with other public agencies. Timeframe: Ongoing</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. Educating the public on proper use and disposal of hazardous materials would not result in an adverse environmental impact, but instead would increase public safety.</p>	<p>Continue</p>
<p>Action S.3.R.3. Effectively manage hazardous wastes by</p>	<p>No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town's guiding policy document to ensure safety in the Town. The management of hazardous</p>	<p>Continue</p>

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Public Health and Safety Element Program Actions	Environmental Impact	Continue/Modify/Delete
coordinating with regional and state agencies. Timeframe: Ongoing	wastes by coordinating with regional and state agencies would not result in an environmental impact.	
Action S.3.R.4. Develop and implement a hazardous waste management, emergency responses, and minimization program by coordinating with other public agencies and private stakeholders. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town’s guiding policy document to ensure safety in the Town. Developing and implementing a hazardous waste management and minimization program would not directly impact the environment; this Program Action would result in public safety.	Continue
Action S.3.U.1. Collaborate with Inyo National Forest and United States Geological Survey (USGS) in developing public education efforts to inform residents and businesses regarding hazards of public CO2 and high hazard areas. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town’s guiding policy document to ensure safety in the Town. Informing residents and businesses regarding hazards of CO2 and high hazard areas would not result in an environmental impact. Instead, informing the public on such hazards would increase public safety.	Continue
Action S.4.C.1. Update and implement emergency response and evacuation plans. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town’s guiding policy document to ensure safety in the Town. This Program Action would increase public safety. This Program Action would not result in an environmental impact as updating and implementing emergency response and evacuation plans would require compliance with local, state, and federal regulations, which would reduce impacts to the natural and built environments.	Amend to reflect update to Action language and continue
Action S.4.C.2. Develop and utilize an emergency notification and information system. Timeframe: Ongoing	No Impact. The Public Health and Safety Element is a policy-level document that serves as the Town’s guiding policy document to ensure safety in the Town. Developing and using an emergency notification and information system would not directly impact the environment. Providing emergency notifications would increase public safety.	Continue

Except as shown in Table 1-2, all existing Public Health and Safety Element program actions will remain in place. In response to the potential impacts of climate change, the Town initiated the Resilient Mammoth Lakes project which is a comprehensive review of how climate change and its related hazards may affect the Town in the future. The resulting strategies identified by the Resilient Mammoth Lakes include updated goals, policies and adaptation actions that ensure compliance with these updated requirements. The following 122 Adaptation Actions, which are actions that will help increase the climate change resiliency of the population, built environment, economy, and natural environment within the City pursuant to the Resilient Mammoth Lakes project, and Actions are new to the Town and included in the proposed Public Health and Safety Element:

- **Adaptation Action S.3.E.1:** Provide information to residents and visitors regarding safe and convenient transportation options including strategies to shelter in place during severe winter weather.

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- **Adaptation Action S.3.F.1:** Improve snow removal and storage systems, modeling after specific needs of residents. Look to community-based snow management systems already used by condominiums, town programs, and private snow storage.
- **Adaptation Action S.3.F.2:** Create equitable and affordable snow removal options for low-income and older residents.
- **Adaptation Action S.3.F.3:** Explore the establishment of local snow shoveling teams, and snow removal equipment lending programs that serve disadvantaged and vulnerable populations.
- **Adaptation Action S.3.F.4:** Explore funding opportunities to support local snow management efforts.
- **Adaptation Action S.3.F.5:** Create and implement a more effective snow removal and storage system to ensure benefits to all residents and visitors, including those populations with limited access to private snow removal equipment.
- **Adaptation Action S.3.F.6:** Ensure that vulnerable populations have access to appropriate mobility and transportation options during severe winter weather events.
- **Adaptation Action S.3.F.7:** Improve snow removal systems to clear walkways for pedestrian traffic.
- **Adaptation Action S.3.F.8:** Explore innovative snow management strategies including use of geothermal resources.
- **Adaptation Action S.3.F.9:** Explore strategies to enable snow-load retrofits to structures that do not meet current standards.
- **Action S.3.F.10:** Promote access to fire hydrants during winter snow periods through greater community outreach and engagement with contractors to provide on-call services, when needed.
- **Action S.3.F.11:** Periodically review and update a mutual aid agreement with Caltrans for snow management and removal along Highway 203 located within Town limits.
- **Action S.3.F.12:** Promote retention of MLFPD contracts to assist in hydrant access.
- **Adaptation Action S.3.M.1:** Promote green infrastructure strategies that increase flood mitigation capacity within the Town by improving flood control, surface retention, and subsurface water storage.¹
- **Adaptation Action S.3.M.2:** Identify and prioritize key neighborhoods for stormwater capture and green infrastructure development.
- **Adaptation Action S.3.M.3:** Develop projects that restore existing flood controls and riparian corridors.
- **Adaptation Action S.3.M.4:** Support tourism and protect natural resources by expanding active outdoor opportunities in green infrastructure areas.
- **Action S.3.O.1:** Update Town Standards to include recommendations from the Storm Water Management Plan.
- **Action S.3.O.2:** Require commercial developments with more than 4,000 square feet of impervious space to provide 20% additional capacity for stormwater retention.
- **Action S.3.O.3:** Industrial uses shall provide an Industrial Stormwater Permit or waiver prior to issuance of a use permit.

¹ Green Infrastructure: Green infrastructure is an approach to water management that protects, restores, or mimics the natural water cycle. (American Rivers 2017)

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- **Adaptation Action S.3.Q.1:** Encourage MCWD to rehabilitate and maintain water and sewer systems as a preventative measure and to improve the system’s resilience to flooding events.
- **Adaptation Action S.3.Q.2:** Work with partners to assess water system flow capacity and determine/ anticipate potential risks/ damage and develop appropriate mitigation strategies, where feasible.
- **Adaptation Action S.3.Q.3:** Encourage rain and stormwater capture gardens and other green spaces.
- **Adaptation Action S.3.Q.4:** Assess and improve stormwater storage.
- **Adaptation Action S.4.C.3:** Expand the use of Spanish translation for information distributed to the public during a disaster event.
- **Adaptation Action S.4.F.1:** Encourage local and regional partnerships to create evacuation routes, evacuation, and shelter locations, and resiliency centers to provide safe refuge during emergencies.
- **Adaptation Action S.4.F.2:** Encourage residents on single-access roads to maintain emergency supplies to last at least three days.
- **Adaptation Action S.4.F.3:** Encourage local and regional partnerships to provide safe evacuation and shelter services that accommodate the needs of populations that are homeless and lack permanent shelter.
- **Adaptation Action S.4.F.4:** Plan transportation routes and transit systems that can support residents and visitors during evacuation situations.
- **Adaptation Action S.4.F.5:** Encourage the incorporation of backup powered emergency response systems into evacuation centers (locations where visitors and residents can seek refuge during an incident).
- **Adaptation Action S.4.F.6:** Encourage collaboration and partnership with local and regional partners on existing alert and notification systems and future enhancements.
- **Adaptation Action S.4.F.7:** Analyze the potential to create and reinforce emergency nodes and routes of transportation, including new or alternative routes for single-access roadways.
- **Adaptation Action S.4.G.1:** Develop a public outreach and education program for homeowners and residents to better prepare for wildfire mitigation and protection.
- **Action S.5.A.1:** Require all new development to comply with fire safety standards consistent with the requirements of the California Building Code Chapter 7A, International Wildland-Urban Interface Code, and Town of Mammoth Lakes Municipal Code, and support ratification of the MLFPD Local Ordinance, specifically Chapter 49, Requirements for Wildland-Urban Interface Fire Areas.
 - and requirements of the MLFPD and Town of Mammoth Lakes.
- **Action S.5.A.2:** Prepare wildfire mitigation landscape standards to address wildfire hazard within the Structure Ignition Zone.
- **Action S.5.A.3:** Review the Zoning Code to ensure compatibility with wildfire mitigation landscape standards and modify if necessary.
- **Action S.5.B.1:** Assist in establishment and implementation of appropriate funding sources so that the MLFPD is prepared to respond to and mitigate emergencies.
- **Action S.5.B.2:** Update Town-specific policies that further protect people and property from the risks of wildland and structural fire hazards.

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- **Adaptation Action S.5.C.1:** Improve fire management coordination between the Town and USFS by working to develop a prescribed and managed burning strategy that acknowledges the busy tourist season.
- **Adaptation Action S.5.C.2:** Encourage the USFS to consider community economic impact into the decision-making process.
- **Action S.6.A.1:** Encourage MLFPD to align the Wildfire Hazard Assessment with future updates to CAL FIRE VHFHSZs.
- **Action S.6.A.2:** Encourage MLFPD to secure CAL FIRE recognition of TOML CWPP hazard mapping when it is more accurate than CAL FIRE VHFHSZ maps.
- **Action S.6.B.1:** Determine whether additional conditions of approval should be required by evaluating allowable land uses that may pose a wildfire hazard.
- **Action S.6.B.2:** Encourage wildfire mitigation best practices in future developments.
- **Action S.6.B.3:** Evaluate future development applications for their potential impacts on risk reduction, such as the location of golf courses, community parks, and other uses that are fire-adapted or incorporate significant areas of fuel modification.
- **Adaptation Action S.6.B.4:** Work with MLFPD to create a Land Inventory using GIS to identify fuel reduction status and points of contact.
- **Action S.6.C.1:** Work with MLFPD to facilitate implementation and ongoing updates of the CWPP.
- **Action S.6.C.2:** Work with partners to update the MJHMP, CWPP, and Safety Element periodically to incorporate the latest information and data and evaluate progress on actions.
- **Action S.6.C.3:** Identify potential post-fire recovery assistance needs, including hazardous tree and debris removal and other landowner recovery measures.
- **Action S.6.C.4:** Coordinate with other agencies to develop a Fire Hazards Response and Recovery Plan for the urban-wildland interface.
- **Action S.6.D.1:** Evaluate alternative emergency access routes in neighborhoods that have single ingress/egress.
- **Action S.6.D.2:** Develop an evacuation plan for high tourism seasons/events.
- **Action S.6.D.3:** Require new development in the VHFHSZ to provide adequate roadway widths and lengths in compliance with Chapter 7A requirements.
- **Action S.6.E.1:** Work with local stakeholders to identify risks associated with trails and open space.
- **Action S.6.E.2:** Incorporate healthy forest management policies into the General Plan, future development, and trails and open space planning.
- **Action S.6.F.1:** Coordinate with the Valentine Reserve, Camp High Sierra, and other partners to identify potential fuel mitigation projects that reduce wildfire risk and support grant funding applications for these projects.
- **Action S.6.F.2:** Update building and landscaping requirements and protocols that integrate CAL FIRE and MLFPD regulations and procedures.
- **Adaptation Action S.6.F.3:** Encourage a drought tolerant and fire-resistant landscaping demonstration garden to encourage public participation in water conservation and fire preparedness efforts.
- **Action S.6.F.4:** Identify long term maintenance actions and funding mechanisms for fuels management and modification, especially along critical roadways and adjacent to critical infrastructure.

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- **Action S.6.G.1:** Pursue grant funding opportunities to support private property owner vegetation clearing and treatments.
- **Adaptation Action S.6.G.2:** Provide education and outreach for funding opportunities for residents and business owners.
- **Adaptation Action S.6.G.3:** Advocate for use of State grants on federal land through the Mammoth Lakes Fire Safe Council.
- **Action S.6.H.1:** Research funding sources to implement a program to support wildfire mitigation retrofits for residential and commercial development.
- **Action S.6.H.2:** Review and align Town Design Guidelines with wildfire construction standards adopted by the Town and MLFPD.
- **Action S.6.H.3:** Analyze the relationship between wildfire risk and proximity to steep slopes and establish minimum slope setbacks for new construction areas as necessary.
- **Adaptation Action S.6.I.1:** Work with partners to provide education and outreach to private property owners to increase or improve defensible space, in addition to increases in individual preparedness and prevention measures.
- **Action S.6.J.1:** Periodically update the Town's critical infrastructure inventory to determine changes to vulnerability from wildfire.
- **Action S.6.J.2:** Coordinate with MLFPD to conduct parcel level assessments of critical infrastructure and provide mitigation recommendations.
- **Action S.6.J.3:** Develop mitigation requirements for future critical infrastructure and facilities.
- **Action S.6.J.4:** Identify ongoing maintenance and long-term integrity requirements and funding sources to address deficiencies in existing and planned critical infrastructure.
- **Action S.7.A.1:** Participate and support Fire Safe Council meetings, activities, and safety strategy.
- **Action S.7.A.2:** Continue to work with MLFPD to communicate on wildfire and planning topics.
- **Action S.7.A.3:** Continue to work with U.S. Forest Service and other federal land managers on fuel mitigation opportunities that benefit ecological goals and achieve wildfire risk reduction.
- **Action S.7.A.4:** Continue to work with CAL FIRE to coordinate mitigation activities and responsibilities.
- **Action S.7.B.1:** Ensure that wildfire risk areas in close proximity to water sources and waterways are prioritized for fuels treatment and mitigation.
- **Action S.7.B.2:** Work with partners to pursue grant funding sources focused on water quality and air quality as part of the community's wildfire strategy.
- **Action S.7.C.1:** Facilitate educational and relationship-building events that bridge public concerns on smoke with land management policies to improve understanding and communication between federal land managers, local residents, and businesses.
- **Action S.7.C.2:** Work with partners to pursue grant funding to stockpile N95 masks, air purifiers, and water, and develop a protocol and procedures for the distribution and use of these masks to residents and businesses, when necessary.
- **Adaptation Action S.7.C.3:** Establish public outreach and education programs to inform residents, businesses, and visitors of air quality alerts.
- **Adaptation Action S.7.C.4:** Create or improve access to weatherization programs and other home fortification resources.

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- **Adaptation Action S.7.C.5:** Work with partners to establish smoke relief centers that are accessible to populations that are homeless and lack permanent shelter.
- **Adaptation Action S.8.A.1:** Expand the Mammoth Lakes Mosquito Abatement District to include all areas within the Town boundary.
- **Adaptation Action S.8.B.1:** Create reliable, year-round transportation systems and explore alternative transit options for extreme weather events such as heavy or wet snow, including centralized parking lots to increase transit ridership.
- **Adaptation Action S.8.B.2:** Implement comprehensive snow removal practices that benefit both motorized vehicle users and pedestrians, and those with limited access to private snow removal equipment.
- **Adaptation Action S.8.C.1:** Assess food security, food transportation routes, and vital services to strengthen and diversify local and regional food systems.
- **Adaptation Action S.8.C.2:** Work with local grocery stores, Mono County, and local health advocates to create a community food storage system.
- **Adaptation Action S.8.C.3:** Coordinate with local food banks and homeless organizations to increase food security and storage systems.
- **Adaptation Action S.8.C.4:** Collaborate with Mono County and local health advocates to establish emergency food storage system.
- **Adaptation Action S.8.C.5:** Create a more robust local food system by expanding year-round local agriculture to include indoor or greenhouse locations.
- **Adaptation Action S.8.D.1:** Collaborate with MCWD to improve and protect existing wells and water resources.
- **Adaptation Action S.8.D.2:** Support MCWD in the continuation of current drought policy and water restrictions with hourly water metering as available.
- **Adaptation Action S.8.D.3:** Encourage Mammoth Community Water District (MCWD) to add water wells to increase water supply reliability during drought years.
- **Adaptation Action S.8.E.1:** Encourage the creation of a powered emergency response center (PERC).²
- **Adaptation Action S.8.E.2:** Encourage continued undergrounding of electrical lines and explore other ways to improve infrastructure to better resist impacts associated with wildfire.
- **Adaptation Action S.8.F.1:** Explore feasible local renewable energy options, including solar, wind, geothermal, and biomass, at a scale that fits the community and local ecology.
- **Adaptation Action S.8.F.2:** Support biomass-to-energy facilities and systems locally and regionally that are scaled appropriately for the community and local ecology.
- **Adaptation Action S.8.G.1:** Increase energy efficiency, renewable energy, and encourage incorporation of electrical battery storage.
- **Adaptation Action S.8.G.2:** Create policies that encourage renewable energy generation.
- **Adaptation Action S.8.H.1:** Seek wood product innovation grants and financing mechanisms to build a market for biomass thinning.
- **Adaptation Action S.8.H.2:** Explore the feasibility of a biomass supply chain from fuel management plans, in order to expand biomass renewable energy.

² Powered Emergency Response Center (PERC): An emergency response center that is powered by a microgrid or alternative sustainable form on energy.

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- **Adaptation Action S.8.H.3:** Explore feasibility of establishing biomass renewable energy in Mammoth Lakes.
- **Adaptation Action S.8.I.1:** Use funding to maintain critical services during and after an emergency or disaster.
- **Adaptation Action S.8.J.1:** Explore potential partnerships to expand workforce trainings to include emergency preparedness.
- **Adaptation Action S.8.K.1:** Increase access to emergency preparedness and mitigation resources specifically for businesses.
- **Adaptation Action S.8.K.2:** Support the business community in increasing their resiliency and ability to reopen after disaster occurs (access to FEMA, SBA, and other financial assistance).
- **Adaptation Action S.8.K.3:** Support efforts to expand business resiliency trainings, data backup plans, and other resources specific to business owners.
- **Adaptation Action S.8.L.1:** Encourage education partners to increase Science, Technology, Engineering, Art/Design, and Math (STEAM) programs, training, and employment.
- **Adaptation Action S.8.L.2:** Facilitate the improvement of broadband connectivity to spur job growth and economic development.
- **Adaptation Action S.8.L.3:** Encourage Mammoth Mountain Ski Area to support additional recreational activities that are less dependent on snowpack levels.
- **Adaptation Action S.8.N.1:** Continue to encourage water-recycling programs.
- **Adaptation Action S.8.N.2:** Foster partnerships with the fishing and water recreation community to encourage water conservation and habitat protection.
- **Adaptation Action S.8.O.1:** Create areas that provide wildlife corridors and habitat to accommodate animal migration patterns.
- **Adaptation Action S.8.P.1:** Support projects focused on minimizing the impact of summer recreation on critical habitat.
- **Adaptation Action S.8.P.2:** Work with partners to improve education surrounding the migration of new plant and animal species to the area including the effects of tourism and recreation on the natural environment.
- **Action S.9.A.1:** Maximize use of educational facilities by creating broader partnerships and adopting joint-use agreements.
- **Action S.10.A.1:** Annually review and update the Town of Mammoth Lakes Master Facilities Plan, Capital Improvement Plan and the Development Impact Fee Schedule.
- **Adaptation Action S.10.B.1:** Use State incentives and programs for weatherizing support.
- **Adaptation Action S.10.C.1:** Work with CPUC, telecommunication, and internet service providers to modernize and strengthen radio and broadband systems, and reinforce barriers to protect vulnerable infrastructure, and open up access for emergency use.
- **Adaptation Action S.10.D.1:** Capitalize on Digital 395 infrastructure to enhance communication capabilities and redundancies.
- **Adaptation Action S.10.D.2:** Improve and expand channels of communication between the Town, emergency service providers and the community.

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- **Adaptation Action S.10.E.1:** Designate community buildings for additional backup services, connections, and power.

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Under CEQA Guideline Section 15164, an addendum to an ND may be prepared if only minor technical changes are required or if none of the conditions identified in Guideline Section 15162 are present. In the absence of substantial evidence to support a fair argument that the project changes may result in significant environmental impacts not previously studied, an addendum to the ND is appropriate. The following review proceeds with the requirements of CEQA Guidelines Section 15162 in mind. The following discussion concludes that the conditions set forth in Section 15162 are not present, and that an addendum is appropriate for the proposed 2019-2027 Housing Element and Public Health and Safety Element.

Discussion

The discussion in this Addendum confirms that the proposed changes to the Housing Element and Public Health and Safety Element updates have been evaluated for significant impacts pursuant to CEQA. The discussion is meaningfully different than a determination that a project is “exempt” from CEQA review, as the proposed 2019-2027 Housing Element and Public Health and Safety Element updates are not exempt. Rather, the determination here is that the potential impacts of the proposed 2019-2027 Housing Element were considered in a previously adopted IS/ND (i.e., the 2014 Housing Element IS/ND) and that the IS/ND provides a sufficient and adequate analysis of the environmental impacts of the proposed 2019-2027 Housing Element update. Furthermore, the potential impacts of the Public Health and Safety Element were considered in 2007 FPEIR and 2016 FEIR which provide a sufficient and adequate analysis of the environmental impacts of the Public Health and Safety Element update. Thus, the Town determined that an addendum rather than an exemption is the appropriate environmental document.

The following identifies the standards set forth in Section 15162 as they relate to the project. The text that follows the provisions of the law relates to the proposed 2019-2027 Housing Element and Public Health and Safety Element.

- 1. No substantial changes are proposed in the project which would require major revisions of the previous IS/ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

The Housing Element Update changes included in the proposed project are limited to complying with state law, or elimination of program action where the Town has already completed the identified task. As with the existing Housing Element, this Update does not result in the rezoning of land, changes to land use designations, or approval of any development project. Subsequent development must be consistent with the General Plan, and if a discretionary act, must complete the CEQA process. The seven new program actions represent changes to and/or the introduction of funding, rental deposit program, research, increasing opportunities for seasonal employees, and ADUs. These modifications do not amend the adopted development pattern for the Town as expressed

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in the Land Use Element of the General Plan and would not physically change the environment. All future development must be consistent with the General Plan and zoning ordinance that govern location and type of land use. The proposed program actions would not allow any development to forego the development review and approval process.

The program action changes included in the Public Health and Safety Element update address compliance with SB 1241, the findings of the climate change vulnerability assessment, and the recommendations of the Community Planning Assistance for Wildfire (CPAW). The program action updates in the Public Health and Safety Element are designed to reduce environmental effects, such as those caused by wildfires and climate change. As indicated on page 3-20 of the 2014 IS/ND, all future development would be subject to the Public Health and Safety Element and applicable Building Codes. The Public Health and Safety Element update would further increase safety of people and structures within the Town.

The new policies associated with the revised Public Health and Safety Element fall into one of three categories: informational, aspirational, and operational. The informational policies help inform residents of hazards in the community. In some instances, the information will be provided to existing residents, such as Adaptation Action S.3.M.2: *Identify and prioritize key neighborhoods for stormwater capture and green infrastructure development*, that would apply to existing neighborhoods. Aspirational policies guide future action that would be subject to later environmental review. This would include a policy like Action S.6.C.4: *Coordinate with other agencies to develop a Fire Hazards Response Plan for the urban-wildland interface*. Finally, the operational policies would be enforced as a part of the development review process and incorporated into the design review and environmental analysis already required of projects. This would include a policy such as Action S.3.O.2: *Require commercial developments with more than 4,000 square feet of impervious space to provide 20% additional capacity for stormwater retention*.

The proposed policies would result in education of existing residents on local hazards, or better coordination on the review or response to existing hazardous conditions, and the application of improved standards during review of future development, the proposed project would not result in new significant environmental impacts, or an increase in severity of previously identified impacts. None of the proposed policies in the proposed Public Health and Safety Element would result in changes to the physical environment.

2. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.

As indicated in the proposed 2019-2027 Housing Element, most of the existing housing program actions will be continued with adoption of the proposed project. Table 1-1 shows that the amended program actions are similar in impact to the existing program actions,

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and in most instances are being amended to comply with existing state law. The seven new program actions pertain to funding, rental deposit program, research, increasing opportunities for seasonal employees, and ADUs. As all development projects must be consistent with the General Plan, zoning, and development standards of the Town, and the proposed project does not propose changes to existing land use or zoning designations, the resulting development impacts would be identical to the previously adopted 2014 IS/ND. All future development would also be subject to the program actions in the Public Health and Safety Element of the Town, as mentioned in the 2014 IS/ND.

The 2014 IS/ND states on page 1-3, that the 2007 FPEIR concluded significant and unavoidable impacts to public safety. According to the 2007 FPEIR prepared for the 2005 General Plan Update which adopted the Public Health and Safety Element, Issue 4.5-6 on page 4-140 pertaining to the Town's location within a FHSZ, indicated that this impact would be significant and unavoidable and that no feasible mitigation measures were identified. This is due to the Town not having jurisdiction over surrounding areas susceptible to wildland fires. Furthermore, the 2016 FEIR provided Mitigation Measure TSM 4.G-1.A, which indicated the Town would undertake actions when applicable to reduce the risk of wildfires.

The Public Health and Safety Element addresses FHSZ and wildfires in Adaptation Actions S.4.G.1 through S.5.C.1, S.6.A.1 through S.7.B.2, and Adaptation Action S.8.E.2 which require educating residents on wildfire mitigation and protection; emergency preparedness during wildfire seasons; collaborating and coordinating with Mammoth Lakes Fire Protection District (MLFPD) on fire planning, preparedness, and response to ensure safety of residents, visitors, and development; and expanding coordination and resource sharing with the U.S. Forest Service, CAL FIRE, and MLFPD to develop mitigation requirements and reduce wildfire risks. The Public Health and Safety Element program actions would encourage the implementation of wildfire construction standards, compliance with fire safety standards, and implementation of wildfire mitigation best practices to ensure a less than significant impact as a result of wildfire hazards on future development.

The hazardous conditions discussed in the proposed Public Health and Safety Element are existing, and not the result of the proposed project. As the Public Health and Safety Element program action updates are designed to further reduce significant environmental impacts within the Town, impacts to safety would be similar to or less than those identified in the FPEIR and the 2014 IS/ND.

- 3. Significant effects previously examined will be substantially more severe than shown in the previous EIR.**

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There were no significant impacts identified in the previously adopted 2014 IS/ND. As stated in the response to 2., above, there are no significant impacts associated with the proposed Housing Element update. The Public Health and Safety Element addresses FHSZ and wildfires in Adaptation Actions S.4.G.1 through S.5.C.1, S.6.A.1 through S.7.B.2, and Adaptation Action S.8.E.2 which require educating residents on wildfire mitigation and protection; emergency preparedness during wildfire seasons; collaborating and coordinating with MLFPD on fire planning, preparedness, and response to ensure safety of residents, visitors, and development; and expanding coordination and resource sharing with the U.S. Forest Service, CAL FIRE, and MLFPD to develop mitigation requirements and reduce wildfire risks. The Public Health and Safety Element program actions would encourage the implementation of wildfire construction standards, compliance with fire safety standards, and implementation of wildfire mitigation best practices to ensure a less than significant impact as a result of wildfire hazards on future development. The Town's Public Health and Safety Element only applies within the Town's boundaries. Therefore, no policy in the element can directly affect the significant and unavoidable determination, as the Town does not have jurisdiction over surrounding areas susceptible to wildland fires.

- 4. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Association of Environmental Professionals 2019 CEQA Guidelines 192.**

There are no mitigation measures included in the previously adopted 2014 IS/ND or the 2007 FPEIR which adopted the Housing Element and Public Health and Safety Element, respectively. The update to the Public Health and Safety Element, as noted in the 2016 FEIR, included the implementation of Mitigation Measure TSMM 4.G-1.A which stated that the Town would undertake actions when applicable to reduce the risk of wildfires. The proposed project does not result in significant impacts that would result in new mitigation measures. The Town is required by state law to follow the program actions of the General Plan, which includes the program actions in the proposed project.

- 5. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.**

There are no mitigation measures included in the previously adopted 2014 IS/ND or the 2007 FPEIR which adopted the Housing Element and Public Health and Safety Element, respectively. The update to the Public Health and Safety Element, according to the 2016 FEIR, included the implementation of Mitigation Measure TSMM 4.G-1.A which

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indicated that the Town would undertake actions to reduce the risk of wildfires when applicable. The proposed project does not result in significant impacts that would result in new mitigation measures. The Town is required by state law to follow the program actions of the General Plan, which includes the program actions in the proposed project.

3. Finding

The Town has reviewed the proposed changes to the 2019-2027 Housing Element and Public Health and Safety Element and on the basis of the whole record before it, has determined that there is substantial evidence to support the determination that the original IS/ND remains relevant in considering the environmental impacts of the proposed changes. Furthermore, there is no substantial evidence to suggest that the environmental impacts of the project, as identified in the Addendum, may have a significant effect on the environment beyond what was evaluated in the adopted IS/ND. Therefore, a subsequent Environmental Impact Report (EIR) or new Mitigated Negative Declaration (MND) is not required. This Addendum to an adopted IS/ND has been prepared pursuant to Title 14, Sections 15162 and 15164 of the California Code of Regulations.

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