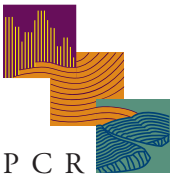
DRAFT INITIAL STUDY

Town of Mammoth Lakes Parks and Recreation Master Plan Project

Town of Mammoth Lakes, California



October 2011

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Town of Mammoth Lakes Parks and Recreation Master Plan Project

Town of Mammoth Lakes, California

Prepared For:

Town of Mammoth Lakes
Community Development Department
P.O. Box 1609
Mammoth Lakes, California 93546

Prepared By:

PCR Services Corporation
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Irvine, California 92618

October 2011

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Environmental Checklist Form

ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Town of Mammoth Lakes Parks and Recreation Master Plan Project

2. **Lead agency name and address:** Town of Mammoth Lakes
   Community Development Department
   P.O. Box 1609
   Mammoth Lakes, California 93546

3. **Contact person and phone number:** Ellen Clark - Senior Planner (760) 934-8989

4. **Project location:** Mammoth Lakes is a resort community of approximately 7,500, located in Mono County in California's Eastern Sierra region. The Town's municipal boundary encompasses over 25 square miles; however, the urbanized area of the town is contained within a much smaller area of about 4.5 square miles, defined by the Urban Growth Boundary (UGB). Land outside of the UGB and within the Town's municipal boundary is primarily undeveloped land in public ownership managed by the United States Forest Service. Beyond the Town's municipal boundary is the Town's Planning Area, which includes the entirety of land within the Town's municipal boundary and includes portions of land within unincorporated Mono County, certain lands owned by the City of Los Angeles, and other public and private entities. The PRMP addresses parks and recreation facilities administered by the Town's Tourism and Recreation Department within and outside of the Town's UGB. For example, Shady Rest Park and Mammoth Creek Park extend beyond the Town's UGB, but are still within the Town's Municipal Boundary. Whitmore Regional Park and Pool is located beyond the Town's municipal boundary, but within the Town's Planning Area.

5. **Project sponsor's name and address:** Same as Lead Agency, above.

6. **General plan designation:** All

7. **Zoning:** All

8. **Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**

   The Town of Mammoth Lakes ("the Town") is proposing to adopt and implement the Town of Mammoth Lakes Parks and Recreation Master Plan [PRMP] ("the project"). The PRMP would replace the 1990 Parks and Recreation Element of the Town's General Plan. The PRMP is intended to provide a vision for future parks and recreational facilities to serve the year-round recreational needs of the Town through the year 2025. The PRMP includes an assessment of existing public and private facilities in and around Mammoth Lakes, an analysis of demand and the need for park and recreation facilities within the Town, and establishes goals, policies, and implementation strategies to guide future improvements. In addition, the PRMP identifies opportunity sites within the Town that could provide for expanded and/or new recreational facilities. The PRMP is a long range planning document and the specifics of parks and recreation facilities and improvements to be implemented over time will be established in the context of evolving needs and conditions in the Town throughout the life of the PRMP.

9. **Surrounding land uses and setting: Briefly describe the project's surroundings:**

   The parks and recreation facilities of the PRMP are located throughout the urbanized area of the Town and beyond the Town's UGB into undeveloped National forest lands that lie within the Municipal Boundary.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

The agencies with the most direct jurisdiction over the facilities discussed in the PRMP are the Town of Mammoth Lakes, the United States Forest Service (USFS), and Caltrans. Other agencies with jurisdiction over individual components of the plans may include, but are not limited to: California Department of Fish and Game, United States Army Corps of Engineers, United States Fish and Wildlife Service, Lahontan Regional Water Quality Control Board, and the Great Basin Unified Air Pollution Control District.

PURPOSE OF THE INITIAL STUDY

The proposed Town of Mammoth Lakes PRMP Project is analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the Project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the Town of Mammoth Lakes. The Town of Mammoth Lakes is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☐ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials	☒ Hydrology/Water Quality
☒ Land Use/Planning	☐ Mineral Resources	☒ Noise
☐ Population/Housing	☒ Public Services	☐ Recreation
☐ Transportation/Traffic	☒ Utilities and Service Systems	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

9-30-2011
Date

ELLEN CLARK
Printed Name

TOWN OF MAMMOTH LAKES
For

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

2) A list of "Supporting Information Sources" should be attached, and other sources used or individuals contacted should be cited in the discussion.

3) Impact Columns Heading Definitions:

- "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.

- "Less Than Significant Impact" applies where the project creates no significant impacts, only Less Than Significant impacts.

- "No Impact" applies where a project does not create an impact in that category. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project falls outside of a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

4) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   - Earlier Analysis Used. Identify and state where they are available for review.

   - Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   - Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

5) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

6) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☒	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire protection regarding the state's inventory of forest land, including the Forest and Range Assessment of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project::				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☒	☐	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☒	☐	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☒	☐	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒	☐	☐
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities??	☐	☐	☐	☒
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Attachment A

Project Description

ATTACHMENT A - PROJECT DESCRIPTION

A. INTRODUCTION

The Town of Mammoth Lakes ("the Town") is proposing to adopt and implement the Town of Mammoth Lakes Parks and Recreation Master Plan [PRMP] ("the project"). The PRMP may replace the 1990 Parks and Recreation Element and update the Parks, Open Space and Recreation of the Town's 2007 General Plan. The PRMP is intended to provide a vision for future parks and recreational facilities to serve the year-round recreational needs of the Town through the year 2025. The PRMP includes an assessment of existing public and private facilities in and around Mammoth Lakes, an analysis of demand and the need for park and recreation facilities within the Town, and establishes goals, policies, and implementation strategies to guide future improvements, as well as revised level of service standards for parks and recreation facilities. The PRMP would inform other more detailed planning and implementation documents such as the Town's Master Facilities Plan and Capital Improvement Plan. In addition, the PRMP identifies opportunity sites within the Town that could provide for expanded and/or new recreational facilities. The opportunity sites would be subject to further study and coordination with public and private participants, which may modify the potential locations of future parks and recreation facilities identified in the PRMP, and the specific facilities that would be developed at those locations. The recommendations for parks and recreation improvements outlined in the PRMP are based on field analysis, inventories, demand analysis, workshop planning sessions, and survey results from residents and second households. The PRMP is a long range planning document and the specifics of parks and recreation facilities and improvements to be implemented over time will be established in the context of evolving needs and conditions in the Town throughout the life of the PRMP.

B. ENVIRONMENTAL ANALYSIS APPROACH

This Initial Study provides support for a Mitigated Negative Declaration (MND) for the PRMP. As required under CEQA, the analysis is conducted in accordance with the State CEQA Guidelines, Title 14 California Code of Regulations. Given the broad focus, conceptual plans, and policy orientation of the PRMP, the environmental analysis for the MND is conducted at a programmatic level.[1] Program level analysis allows the Town and the public to consider the project in its entirety and the impacts associated with policies, standards and management actions in the PRMP which might be overlooked if only considered on a case-by-case basis. As such, the analyses provided herein, serves as a foundation for future evaluation of individual projects proposed by the PRMP. If future case-by-case evaluation of individual PRMP projects determines they have potential for significant environmental impacts, subsequent CEQA documents may be "tiered" from the analysis provided in this document to streamline environmental review.[2] If the potential impacts of future PRMP projects are determined by the Town to be adequately addressed and mitigated through this document, further CEQA analysis may not be required.

[1] *Pursuant to CEQA Guidelines Section 15168, Program EIR.*

[2] *Pursuant to CEQA Guidelines Section 15151, Tiering.*

C. BACKGROUND

The Town updated its General Plan in 2007, which includes goals, policies, and actions for Parks, Open Space, and Recreation that are the foundation for the goals and policies in the PRMP. Approval of the proposed PRMP would represent completion of the following action stated in the Town's General Plan: "Develop a comprehensive and integrated year-round Parks and Recreation Master Plan." In addition, goals and policies presented in the PRMP are intended to support other General Plan goals, especially those related to Mobility, Economy, and Community Design. Pursuant to those policies and directives, the PRMP has been developed to meet the needs of the Town's population through the year 2025. The PRMP provides an estimate of current (2006) and projected population that takes account of the town's permanent population, and the estimated increment of demand for parks from second homeowners. From 2006 through 2025 the PRMP estimates that the Town's "recreation population" (permanent residents plus second homeowners) will grow from 8,406 people to 12,052 people, with a commensurate increase in demand for recreation facilities.

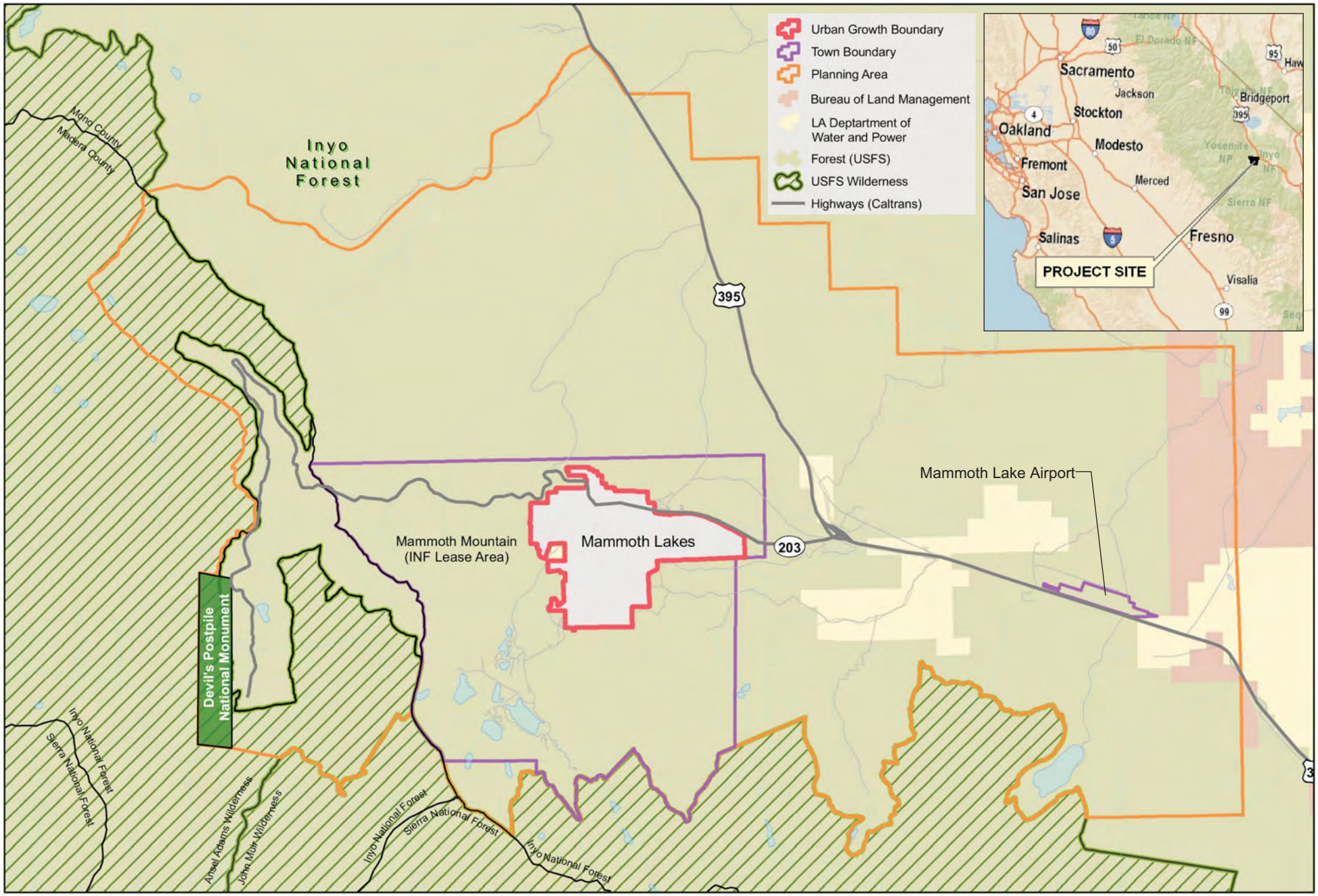
Three other planning documents that relate to the PRMP and also address recreational-related facilities within the Town include the General Plan Mobility Element, General Bikeway Plan, and the Trails System Master Plan (TSMP). The Mobility Element, updated in 2007, promotes multi-modal transportation in Mammoth Lakes through coordinated development of pedestrian and bicycle paths, trails, public transit, streets and parking facilities. The General Bikeway Plan, updated in 2008, identifies the bike path network in the Town with the primary goal to facilitate bicycle commuting. The TSMP is a comprehensive trails plan for the Town for which a Draft update was prepared in 2009 and which is currently undergoing environmental review. The TSMP includes a network of trails designed to connect parks and open spaces, and provide access to schools, business areas, recreation sites, and residential areas. The TSMP includes recommendations for future trails, bike paths, bike routes, trailheads, signage, staging areas, and other features related to motorized and non-motorized trail uses.

While the PRMP focuses on parks and recreation facilities (non-trail related recreational facilities), it recognizes the importance of integrating trails with these facilities. Thus, the PRMP recommends the development of 5.2 miles of paved recreation trails. These trails are identified in more detail in the TSMP and will be subject to a separate environmental review as part of that project.

D. PROJECT LOCATION AND SURROUNDING LAND USES

Mammoth Lakes is a resort community of approximately 8,200, located in Mono County in California's Eastern Sierra region. The Town's municipal boundary encompasses over 25 square miles; however, the urbanized area of the town is contained within a much smaller area of about 4.5 square miles, defined by the Urban Growth Boundary (UGB). The UGB was adopted in 1993, as a growth management tool to ensure the Town retained its compact urban form, and to prevent sprawl that would threaten surrounding natural and recreational resources. Land outside of the UGB and within the Town's municipal boundary is primarily undeveloped land in public ownership managed by the USFS. Beyond the Town's municipal boundary is the Town's Planning Area, which includes the entirety of land within the Town's municipal boundary and includes portions of land within unincorporated Mono County, certain lands owned by the City of Los Angeles, and other public and private entities. **Figure A-1,** *Mammoth Lakes Area Jurisdictional Boundaries***,** illustrates the jurisdictional boundaries of the Town.

The PRMP addresses parks and recreation facilities administered by the Town within and outside of the Town's UGB. For example, Shady Rest Park and Mammoth Creek Park extend beyond the Town's UGB, but



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0 2 Miles

Mammoth Lakes Jurisdictional Boundaries

Parks and Recreation Master Plan Project

Source: PCR Services Corporation, 2011

FIGURE

A-1

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are still within the Town's Municipal Boundary. Whitmore Regional Park and Pool is located beyond the Town's municipal boundary, but within the Town's Planning Area. While some facilities are located on land owned by the Town, others are on land leased or under special permit from other agencies, including the US Forest Service (Shady Rest Park and portions of Mammoth Creek Park), and Los Angeles Department of Water and Power (Whitmore Regional Park and Pool).

E. EXISTING CONDITIONS

1. Existing Park Facilities

Various public, quasi-public, and private parks, recreation facilities, and trails are located in the Town. The Town's open space and park locations are shown in **Figure A-2**, *Land Use-Open Space and Parks*. A listing of the park facilities, with information regarding park features is shown in **Table A-1**, *Existing Town of Mammoth Lakes Parks and Recreation Facilities*, below. As indicated in the figures and table referenced above, the Town owns and/or operates six public parks totaling 74.9 acres. .Most public parks and private recreation facilities are located in the eastern part of Town, leaving many residents without proximate and convenient access to these facilities. Public input highlighted this issue, particularly for Shady Rest Park and Whitmore Park.

Several of the Town's park facilities have been added or expanded since 1990. These include the expansion of Shady Rest Park from 6 acres to 12.52 acres and the addition of additional ball fields, soccer field, basketball court and other facilities. The Trails End Park is also new since 1990 and planning is underway to complete Phase 2 to include a playground and picnic facility. The Multi-Use Path (MUP) in Mammoth Creek Park East is recent and new play equipment landscaping and restrooms have been added to Mammoth Creek Park West. In addition, the proposed Whitmore Track and Field Project includes the construction and operation of a track and field facility, sports field, and associated amenities, including a concessions building, terraced seating, a covered open-air pavilion, walkways and plaza, fitness trails, workout stations, and landscaping. Construction in Whitmore Park is anticipated to be conducted in three phases, the first of which would begin in summer of 2012.

2. Other Recreational and Leisure Facilities

The Town's residents and visitors have various choices for recreation, including public, private, and fee-based facilities. There are also facilities operated by the Mammoth Unified School District (MUSD) at the Elementary, Middle and High Schools which provide some level of public recreational opportunities, and which may have the potential to meet some of the Town's future recreation needs if determined to be compatible with MUSD's primary use of the facilities. The types of facilities available in Mammoth Lakes and vicinity include: boating/fishing; camping, cross country skiing; dog sledding; downhill skiing; equestrian facilities; a football stadium; golf; gymnasium; handball and racquetball courts; hiking/backpacking; historic sites; hot springs; interpretive centers; meeting facilities; motocross; multi-use field; natural reserves; picnic areas; playground, snow play area; snowmobiling; swimming pools; and tennis courts. At many of these facilities, recreational programs sponsored by the Town's Tourism and Recreation Department are available to youth and adults. An outdoor ice rink became operational in winter 2007-08 in the South Gateway area. Although, this facility was not operated in 2010-11, it is scheduled to open again for the 2011-12 season and beyond.

Table A-1

Existing Town of Mammoth Lakes Parks and Recreation Facilities

Facility	Size (acres) [c]	Playground	Tennis court	Ball field	Soccer field	Volleyball	Basketball	Skate park	Swim Pool	Picnic table	Picnic shelter	Restrooms	Parking	Description of Existing Facilities
Community Center and Park	5.18 of 5.18	1	6							2		1	40	Contains 2,550-s.f. Community Center with main room, kitchen, BBQ grill, storage, and restrooms. Building is used frequently for classes, meetings, and private gatherings. Building needs some maintenance. Playground equipment, tennis courts, and one outdoor horseshoe pit is available. Adjacent former library building was converted in 2010 to office space for the Mono County Office of Education. Over 25 parking spaces for Center; about 15 spaces for tennis courts.
Shady Rest Park[a]	12.5 of 12.5	2		3	2	2	1	1		30	1	2	200	Park includes 2 ball fields, 1 soccer field, basketball court, small skate park, snack bar with cooking and cold food storage, and picnic tables. Park is well-used for team sports, programmed recreation activities, social gatherings, and as staging for access to National Forest trails nearby. There is parking for 200 vehicles, plus additional unpaved overflow parking.
Trails End Park	2.3 of 4.11							1				1	26	40,000 s.f. Volcom Brothers skate park. Paved bike trail system along edge of park. Parking currently for 26. Planning is underway to complete Phase 2 of park improvements which will include installation of a playground and picnic tables.
Mammoth Creek Park East[a]	3.5 of 9.01									6		1	0	Primarily used for passive recreation; Mammoth Creek provides fishing opportunities. Also, there is a paved multi-use path along Mammoth Creek.
Mammoth Creek Park West[a]	2.0 of 11.4	1								5		1	30	Park includes play equipment, landscaping, and restrooms. There is paved parking for about 30 vehicles.

Table A-1

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Mammoth Creek Park West[a]	2.0 of 11.4	1								5		1	30	Park includes play equipment, landscaping, and restrooms. There is paved parking for about 30 vehicles.

In addition to more "traditional" recreation facilities, indoor and outdoor venues such as park areas, parking lots, plazas, etc. are used for a range of community events in Mammoth Lakes, such as Jazz Jubilee. These events are important to the Town's tourism-based economy, and provide opportunities for residents and visitors to gather and socialize. Attendance varies widely for the different events, from several hundred to several thousand; some are multi-day and multi-venue events. Although some events occur on public land (e.g., National Forest Land under Special Use Permit, Mammoth Creek Park, Shady Rest Park), many commonly used venues are on private property. According to Town staff, concerns about the event venues currently used in Mammoth Lakes include: gradual loss of venue space on private property; lack of parking; noise complaints, lack of indoor venue space; and added expenses for venues on USFS lands. Further details regarding the Town's recreational and leisure facilities and community events are provided in the PRMP.

F. DESCRIPTION OF THE PROPOSED PROJECT

The proposed project addressed in this Initial Study is the PRMP. The following provides a summary of key aspects of the proposed PRMP with further details provided within the plan itself.

1. Goals and Policies

The proposed PRMP provides a vision for developing parks and recreation facilities in the Town through the year 2025. The PRMP was developed with recognition of the Town's relationship to other jurisdictions in the vicinity and recreational facilities within those jurisdictions that create the larger fabric of recreational opportunities in the region.[11] As a long-range planning document, the PRMP includes a number of components that are intended to set the framework for making informed future decisions regarding the provision of parks and recreation facilities while avoiding or reducing impacts to the physical environment.

The primary goal of the PRMP is to further develop a system of parks and recreation facilities which will support the vision for Mammoth Lakes as a premier destination resort with a variety of year-round experiences for residents and visitors. Goals 1 through 5 repeat Goals P.1. through P.5. in the Parks, Open Space and Recreation Element of the 2007 General Plan. Goal 6 is a new goal listed in the PRMP only, which may be adopted as an amendment to this Element.

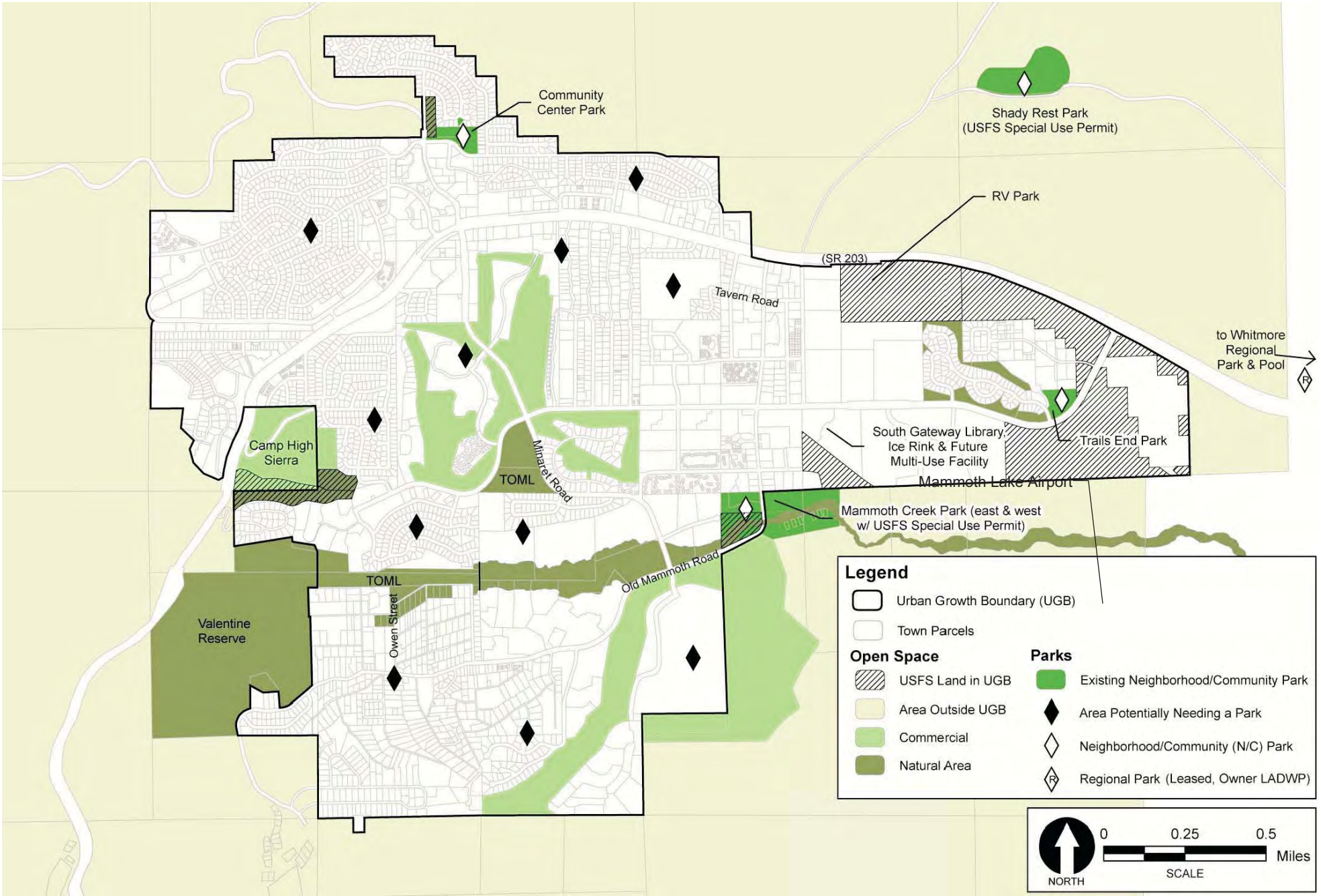
A series of policies and/or actions are listed below under each goal. In some cases these policies or actions are the same as those presented in the General Plan Parks, Open Space and Recreation Element. New policies and actions presented in the PRMPare proposed to further support the goals set forth in the the General Plan Parks, Open Space and Recreation Element.

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

[There are no policies for this goal in the 2007 Town of Mammoth Lakes General Plan. The following are proposed policies for Goal 1.]

1. Protect the scenic beauty and natural resources of Mammoth Lakes through a Parks and Recreation Master Plan that includes parks, open space, and a trail system.

[11] *Other jurisdictions/facilities include Federal public lands, Mammoth Creek corridor open space, Valentine Eastern Sierra Ressreve, undeveoped private and Town-owned green space within the UGB, and lands owned and mangaged by the City of Los Angeles.*



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Land Use-Open Space and Parks

Parks and Recreation Master Plan Project

Source: Draft Parks and Recreation Master Plan, April 4, 2008

FIGURE

A-2

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2. Continue to maintain and upgrade existing parks and recreation facilities, and develop a plan to retrofit existing parks and design all new facilities to ADA standards, to provide for accessibility and enjoyment by physically impaired citizens.

3. Upgrade parks and recreation facilities to promote resource efficiency and cost-effective maintenance practices.

4. Ensure adequate funding for ongoing maintenance and rehabilitation of existing parks and recreation facilities.

Goal 2: Provide additional parks within town.

[The PRMP includes policies for this goal as set forth in the 2007 Town of Mammoth Lakes General Plan. Please refer to PRMP which lists policies 2A to 2E. The following are additional proposed policies for Goal 2.]

1. Promote Mammoth Lakes' quality of life with parkland and recreation facility acquisition and development at or above the level of service standards recommended in this Plan.

2. Provide parks and recreation facilities in a timely manner with existing and planned development.

3. Engage continued citizens' involvement in planning parks and recreation facilities, and periodically re-evaluate the provision of these facilities through a needs assessment study.

4. Seek funding from a variety of sources to acquire and develop new parks, and maintain adequate funding for operation and maintenance of new parks and recreation facilities.

5. Design and build parks and recreation facilities to ensure compatibility with the surrounding neighborhood and natural environment.

6. Assure that new parks and recreation facilities comply with ADA standards, for safe use and enjoyment by physically impaired citizens.

7. Develop parks and recreation facilities to facilitate efficient and cost-effective maintenance practices.

Goal 3: Create a Master Plan for an integrated trail system that will maintain and enhance convenient public access to public lands from town.

[The PRMP includes policies for this goal as set forth in the 2007 Town of Mammoth Lakes General Plan. Please refer to PRMP which lists policies 3A to 3C. The following is an additional proposed policy for Goal 3.]

1. Support the construction of trails to provide public access from Town to public lands.

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

[The PRMP includes policies for this goal as set forth in the 2007 Town of Mammoth Lakes General Plan. Please refer to PRMP which lists policies 4A to 4E. The following are additional proposed policies for Goal 4.]

1. In partnership with the U.S. Forest Service, coordinate planning for compatible recreational uses and facilities on and adjacent to National Forest Land.

2. Partner with Mammoth Unified School District to fully utilize existing Town recreation facilities by students, and broaden public use of school facilities after school and during evenings and weekends.

3. Partner with private organizations to deliver recreation programs and provide and/or operate special purpose facilities.

4. Acquire, construct, or upgrade indoor recreation facilities to accommodate desired indoor recreation activities and leisure programs.

5. Provide recreation facilities, programs, and classes that are available to all citizens, including people of all ages, abilities, ethnic background, and income levels. Keep programs affordable, and develop program packages for those with more moderate incomes (including seasonal workers).

6. Provide parks and recreation facilities that are accessible by a variety of mobility linkages:

    i. Public pedestrian access to private development projects

    ii. Transit stops within private development projects (private or public roads)

    iii. Public opportunities for parking to access public lands (including ADA parking)

7. Develop a reservation and pricing policy for exclusive use of certain facilities.

8. Develop a Town Park Management Program.

    i. The Program could include a Park Ranger to monitor park use and activities.

    ii. Park Rangers could help conduct programs.

9. Promote awareness of the Town's parks and recreation facilities, programs, and special events.

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

[The PRMP includes policies for this goal as set forth in the 2007 Town of Mammoth Lakes General Plan. Please refer to PRMP which lists policies 5A to 5G. The following are additional proposed policies for Goal 5.]

1. Develop an integrated trail system in cooperation with federal agencies and consistent with the Town's General Plan (Mobility Element), by updating the General Bikeway Plan and Trail System Plan.

2. The trail system should accommodate winter and summer use by a variety of users, including pedestrians, bicyclists, and Nordic sports enthusiasts.

3. The trail system should connect parks, schools, other designated activity centers, and trails on public lands adjacent to Mammoth Lakes.

4. Create an integrated way-finding system that encompasses trails, parks, and recreation facilities with unified and consistent signage design.

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.

[There are no policies for this goal in the 2007 Town of Mammoth Lakes General Plan. The following are proposed policies for Goal 6.]

1. Plan parks and recreation facilities and develop recreation programs with public input.

2. Distribute parkland within the community to increase walkability from key residential nodes.

3. Offer and accommodate events and activities that foster community gathering and celebration.

4. Encourage neighborhood district identity and cohesion through events and programs.

5. Provide facilities and programs that support togetherness within and among families.

2. Parks and Recreation Standards

One of most important provisions of the PRMP is the modification of level of service (LOS) standards that identify the amount of park and recreation facilities needed to meet the PRMP's goals. The LOS standards included in the PRMP were determined in consideration of numerous factors including: public and other community input; and, a comparison of other LOS standards in communities with similar population, geographic and/or economic characteristics as Mammoth Lakes. The PRMP recommends adopting a standard of 5 acres of local parkland per 1,000 residents. This is consistent with a Quimby-type ordinance[12]

[12] *The 1975 Quimby Act (California Government Code §66477) authorizes cities and counties in California to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities.*

(which specifies minimum parkland dedication and/or in-lieu fees for new development), should the Town decide to adopt one. In addition, the PRMP recommends a standard of 2.5 acres of regional parkland per 1,000 residents. **Table A-2**, *Recreation Facilities Needed to Meet Recommended LOS Standards*, includes the recommended LOS standards for the Mammoth Lakes. Table A-2 also includes the existing amount (in acres) and number of recreational facilities available within the Town. Further, the table identifies the amount and number of additional recreational facilities needed to meet the recommended LOS standards by 2025.

To achieve the recommended LOS for parks and recreation facilities by 2025, the PRMP estimates that an additional 27.67 acres of developed local parks would be needed for a total of 56.14 acres. As proposed in the PRMP, this increase in parkland could be achieved through acquisition of an additional 13.88 acres for local parks by 2025, assuming that all of the existing undeveloped local parkland is developed. In addition, 18.07 more acres of developed regional parkland should be available to Town residents by 2025 (for a total of 28.07 acres). The PRMP estimated that the 32.64-acre lease area at Whitmore Park, which includes both the Whitmore Pool lease area of approximate 8.9 acres, and the Whitmore Park/Ballfields lease area of approximately 23.75 acres, would potentially be large enough to absorb this increment of new parkland. In 2009 a proposal was brought forward by a local running group, the High Sierra Striders, to develop a high performance track and field facility, with a synthetic infield that could accommodate a range of sports including soccer, within the remaining undeveloped area adjacent to the existing ball-fields. A Use Permit application was submitted to Mono County in 2010, and the project is currently undergoing CEQA review ("Whitmore Park Track and Sports Fields Initial Study/Mitigated Negative Declaration; SCH #2010102049).

In addition to the LOS standards for developed parkland, the PRMP provides recommended LOS ratios for other recreation amenities ranging from picnic tables and park benches to baseball fields and swimming pools. In many cases, the Town's current facilities are determined to be sufficient for the community's existing and future needs. In other cases, notably picnic facilities (shelters and tables), park benches, and some types of sports fields, the PRMP suggests that additional facilities may be needed to serve future population growth. It is assumed that many of these facilities could be accommodated within the existing undeveloped and future parkland acquisition areas. As noted below, specific sites and funding has not been identified for major facilities such as an aquatic center; additional planning and study would be needed to determine the location, feasibility and design of such facilities.

Several capital-intensive projects also are recommended in addition to developed parkland: an outdoor events venue with band shell or amphitheater, multi-use recreational/cultural facility, and indoor swimming pool/aquatic center. Although the apparent need for some new facilities appears low, in actuality the PRMP acknowledges that they should be supplemented to provide year-round service. For example, the need for new playgrounds appears to be low, based on the current number of playgrounds. However, these facilities are not available in winter, although children should still have play options for this time of year (ideally for both indoor and outdoor play). The PRMP suggests that provision of year-round service can be accomplished by adding new facilities and/or by retrofitting existing outdoor facilities for year-round use.

Table A-2

Recreation Facilities Needed to Meet Recommended LOS Standards

Park and Recreation Facility or Amenity	Recommended LOS Standard for Mammoth Lakes a	Existing Number of Facilities b	Total additional Facilities to Achieve LOS by 2025 d
Local Parkland Acreage	5.00	28.47 / 42.26	27.67
Regional Parkland Acreage	4.11	10 / 32.64	18.07
Facilities in TOML Inventory			
picnic tables	5.69	43	26
picnic shelters	0.56	1	6
playgrounds	0.36	3	1
park benches	1.78	15	7
tennis courts	0.86	6	4
(outdoor) basketball courts	0.12	1	0
(sand) volleyball courts	0.24	2	1
soccer/multiuse fields	0.50	2	4
ball fields (unspecified)	0.59	5	2
baseball fields (adult)	0.12	1	0
skateboard parks (small)	0.12	1	0
skateboard parks (large)	0.12	1	0
outdoor swimming pool (ea)	0.12	1	0
community center (ea)	0.12	1	0
paved multi-use trails (miles)	1.62	9	5.20 e
Potential TOML Facilities			
outdoor events venue (acres)	1.34	0	16
band shell/amphitheater (ea)	0.10	0	1
dog park (ea)	0.17	0	2
Potential Partner Facilities			
recreation centers/gyms (ea)	0.10	0	1
recreation centers (sq ft)	2,000		24,104
ice hockey rink (ea)	0.10	0	1
running track (0.25 mile)	0.10	0	1
indoor swimming pool (ea)	0.05	0	1
swimming pool (sq ft)	1,000		12,052

[a] *Standards expressed as number of units per 1,000 Town residents (for park acreage) or 1,000 members of the "recreation population" (for other amenities). Estimates of Town population are from Report to The Town of Mammoth Lakes (2006), by the UCSB Economic Forecast Project (Susan Dalluddung, Terri Swartz, and Bill Watkins), with assistance from Dan Hamilton and Mike Smith (Forecast Overview Tables, "Part 1."); recreation population includes an adjustment for second homeowners.*

[b] *First number for local and regional park acreage is developed park acreage; second number is gross (developed plus undeveloped parkland in current inventory).*

[c] *Number needed in addition to current to meet LOS for 2006—for parkland, this is the number of additional developed acres, for a total of 38.95 acres local park and 19.47 acres regional park. 2006 recreation population of 8,406 has 7,789 residents plus 617 "equivalent" recreation impact of second homeowners.*

[d] *Number needed in addition to current to meet 2025 LOS—for parkland, this is a total of 56.14 acres developed local park and 28.07 acres developed regional park (would need to acquire additional 13.88 acres for local park development to meet 2025 LOS). 2025 recreation population of 12,052 has 11,228 residents plus 824 "equivalent" recreation impact of second homeowners.*

[e] *Note that 2025 trail miles include the Lake Mary Road bike path (5.3 miles, not in existing facility inventory)*

Source: Draft Parks and Recreation Master Plan, Town of Mammoth Lakes, 2008

3. Opportunity Sites

The PRMP identifies numerous opportunity sites that would accommodate future recreational needs within the Town based on the recommended LOS standards.[5] The "opportunity sites" described in the PRMP are conceptual proposals for sites that may or not be developed with recreational facilities as described in the PRMP. The locations for parks and recreational uses, identified as opportunities sites include: new land development projects (i.e., Snowcreek VIII, The Sherwin, Shady Rest/Hidden Creek, and Clearwater); Town owned and federal public lands (i.e., National Forest lands); other public resources such as school and County owned properties; and public-private partnerships (i.e., partnerships with the two golf courses in Mammoth Lakes can be established to enable winter use of golf course land for cross-country skiing and snowshoeing). Because the opportunity sites and associated facilities proposed in the PRMP are conceptual in nature and may or may not be developed, they are not evaluated in detail in this MND.

4. Recommendations

The PRMP outlines recommendations that are intended to enhance existing parks/recreation facilities, as well as provide new park/recreation facilities in Mammoth Lakes. First, existing park facilities should be maximized through maintenance and improvements, and should be funded and completed as planned. Improvements to each of the Town's six parks are indentified in the PRMP including recommendations such as: upgrading facilities to comply with ADA (Americans with Disabilities Act) requirements; creating master plans for specific park improvements; and installing new recreational facilities (i.e., playground equipment and picnic tables). The PRMP further recommends that improvements be considered that will increase the capacity of these existing facilities. Winter use of these parks should be expanded where possible, for example as trail portals with restrooms open year-round.

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

1. Additional Parkland. The Town should acquire and/or develop more park acreage to meet future LOS needs as the population grows. The estimated area needed by 2025 is an extra 13.88 acres of developable land in Town for active recreation. In addition, most of the existing undeveloped park acreage (local and regional) will need to be developed to provide more recreation capacity and amenities. While no specific properties or sites are targeted for acquisition as parkland, the PRMP notes that the expansion of parkland can occur by: adding to existing parks; developing new parks on land owned or acquired by the Town; having new development provide parks; and acquiring and/or improving additional acreage near Town to meet regional parkland needs. Any such options would require additional study for feasibility, cost, and environmental and other constraints before being pursued.

2. Aquatic Center. The PRMP recommends developing an in-Town indoor year-round aquatic center. Such a facility may be a joint use facility developed with other partner agencies or, in the short term enclosure of the existing Whitmore outdoor pool to allow for year-round use. No specific site for a new aquatic center is identified in the PRMP, and no design or other more specific proposal has been

[5] *Existing and potential locations throughout the Town for recreational activities are summarized in Table 11 of the PRMP.*

made at this time. An indoor pool is listed as a "potential facility" in the South Gateway area adjacent to the Community College and library.

3. Dog Parks. Current Town code (sections 6.12.210 and 12.20.340) requires that dogs must be kept on a leash in public parks and other public areas within Town limits. Mammoth Lakes' residents have expressed a need for off-leash dog areas, or dog parks, in Town. The PRMP recommends the provision of a dog park immediately in Town to help meet this current recreation need, and potentially a second dog park to meet LOS demands by 2025. Dog parks must be located to minimize disturbing neighbors; park size is ideally at least one acre.

4. Event and Performance Venues. The PRMP suggests that new event venues, including venue(s) that can accommodate large crowds (several thousand), and that the Town should consider providing venues in different contexts. For example, an "urban" site could host smaller, frequent events that would benefit from easy in-Town access. Alternatively, a "nature" site could accommodate events that could capitalize on the Town's unique setting. Both indoor and outdoor venues should be provided. No specific sites are called out as locations for future venues. No specific sites are called out as locations for future venues.

5. Picnic Areas. The PRMP recommends adding up to six more picnic shelters and 26 more picnic tables by 2025. Ideally, at least one shelter should be available within each park, to better distribute the supply of picnic areas throughout Town.

6. Multi-Use Recreational/Cultural Facility. The PRMP suggests that construction of a multi-use recreational facility is needed to accommodate indoor recreation and programs (i.e., indoor sports courts/fields, children's play area; sports training, running track, etc). Such a facility could maintain year-round levels of service by providing indoor amenities for winter and evening use, when outdoor facilities are unavailable. Similar to the aquatic center, no specific site has been identified for such a facility, and no design or other more detailed proposal advanced at this time.

7. Snow and Winter Play Areas. The PRMP recommends that opportunities for year-round play be provided by indoor or other sheltered play areas and outdoor places for winter play in the snow. Indoor play areas may be accommodated in a new multi-use recreational/cultural facility and possibly the old library building. While the PRMP does not make specific proposals for the location of winter snow play areas, it mentions a number of possible sites such as Trails End Park, Shady Rest Park, and the knoll near the Snowcreek VIII-area gravel pit, and near Scenic Loop Road where existing informal snow play occurs .

8. Sports Fields and Courts. The PRMP identifies an immediate need for a multipurpose field that can be used for soccer, as well as a facility for indoor soccer games. Looking toward the future, additional soccer fields, tennis courts, and ball fields will be needed to meet 2025 LOS standards. It should be noted that the proposed Whitmore Track project, currently under review, includes a synthetic turf infield that can accommodate soccer and football.

Potential locations for new facilities and park expansion are shown in **Figure A-3**, *Potential Opportunities for Facility Locations*. The improvements represented in Figure A-3 are not a definitive set of improvements, but rather a representative scenario of parks and recreation improvements that are consistent with the goals, policies and implementation considerations within the PRMP. The actual improvements that are constructed in the future may vary from those shown in Figure A-3 in response to ongoing surveys and

planning activities, new lands/partnership opportunities, implementation considerations, identification of environmental constraints, etc.

It should also be noted that the projected need for new facilities is based on the estimated population in 2025, which in large part will depend on the extent and nature of growth and development in Mammoth Lakes over the next 15 years. The PRMP emphasizes the importance of periodically reviewing and updating the analysis of recreation needs and associated standards in response to changing conditions and new information. Efforts underway since release of the Draft PRMP in 2008, including planning processes to reassess the planning and financing of community facilities (Capital Facilities Financing Committee, 5-Year Capital Improvement Plan Update, and Public Facilities Financing Plan), and to prioritize recreational programs and facilities (RECSTRATS) may result in revisions to the list of facilities and priorities outlined in the PRMP.

The PRMP also includes "Administrative Recommendations" that include the following:

1. Create a plan for partner opportunities and develop joint-use agreements with partner agencies and organizations (see Implementation section).

2. Develop and implement a system to document park usage and reservations, in order to track capacity of recreation facilities.

3. Develop a maintenance plan based on:

   - A complete "maintenance inventory" of parks and recreation facilities
   - Routine evaluation of the condition of park assets
   - Maintaining asset value through proportional maintenance investment and an increasing focus on preventive maintenance

4. Ensure adequate financial commitment and funding allocation from the Town of Mammoth Lakes to build and maintain parks, recreation facilities, and trails.

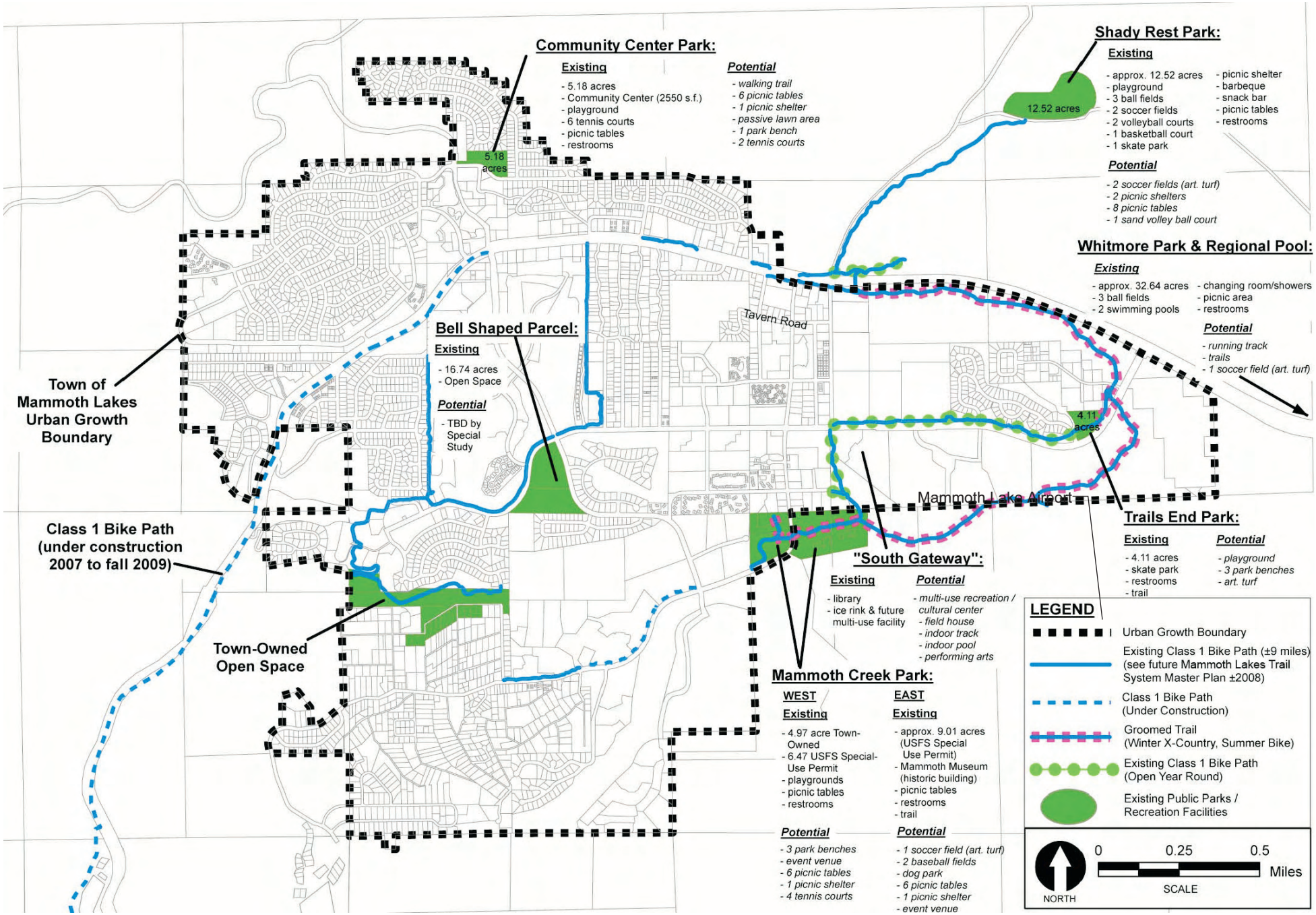
5. Evaluate Town-owned/leased special study areas for their ability to accommodate new outdoor and recreation facilities.

6. Evaluate development and redevelopment projects for their potential to provide public parks and other public-access recreation facilities, trails, and trail access or staging areas.

As stated above, while the PRMP focuses on parks and recreation facilities (non-trail related recreational facilities), it recognizes the importance of integrating trails with these facilities. Trails will be identified in more detail in the TSMP and will be subject to a separate environmental review as part of that project.

G. Construction Activities

Construction of individual improvement projects will occur as funding and resources become available over time with the duration of construction dependent on individual project types. Generally, individual improvement projects would occur intermittently throughout the time of the plan, ending in 2025. Some overlapping of projects may occur. Many of the improvements identified are minor, consisting of enhancements to existing facilities without notable construction activity. Some projects would require more



PCR

Potential Opportunities for Facility Locations

Parks and Recreation Master Plan Project

Source: Draft Parks and Recreation Master Plan, April 4, 2008

FIGURE

A-3

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notable construction activity inclusive of grading for fields and site grading/preparation building construction for new buildings.

H. Jurisdictional Agencies/Approvals

The PRMP and the IS/MND are subject to review and approval by the Town of Mammoth Lakes. The Mammoth Lakes City Council would have final discretion over the PRMP and IS/MND through adoption of these documents. No other approvals would be required. However, some individual projects/improvements identified in the PRMP would be subject to subsequent discretionary approval by the Town, with additional approvals and certifications based on the site-specific characteristics and proposed actions associated with individual projects. In addition, for facilities located on land owned or managed by other public agencies, such as Shady Rest Park, Whitmore Park, and approval of renewed or amended permits would be required, either because existing permits have or will expire, or because new facilities are proposed that were not included in the original permit.

Attachment B

Explanation of Checklist Determinations

ATTACHMENT B - EXPLANATION OF CHECKLIST DETERMINATIONS

This Initial Study is a public document to be used by the Town of Mammoth Lakes to determine whether the Parks and Recreation Master Plan (PRMP) would have a significant effect on the environment. Responses to the CEQA Checklist presented in Appendix H of the CEQA Guidelines, determines whether the project could have a potentially significant impact on the environment, a less than significant impact with the incorporation of mitigation, a less than significant impact with no mitigation required, or no impact. If the Town, as the Lead Agency, finds substantial evidence that any aspect of the PRMP, either individually or cumulatively, may have a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency is required to prepare an environmental impact report (EIR).

If the Lead Agency finds no substantial evidence that the project or any of its aspects may cause a significant impact on the environment, a Negative Declaration would meet the requirements of the CEQA Guidelines. If, in the course of the analysis, it is recognized that the PRMP may have significant impacts on the environment, but these impacts can be mitigated to a level that is less than significant, a Mitigated Negative Declaration would meet the requirements of the CEQA Guidelines. This Section presents the CEQA Checklist and an evaluation of each Checklist item to determine the potential environmental impacts of the PRMP.

Environmental issues evaluated in this chapter consist of the following:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Parking
- Utilities and Service Systems.

For each issue, one of four conclusions is made:

- **No Impact**: No project-related impact to the environment would occur with project development.
- **Less Than Significant Impact**: The impact would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
- **Less Than Significant Impact With Mitigation Incorporated**: An impact that is "potentially significant" as described below; however, the incorporation of mitigation measures would reduce the project-related impact to a less-than-significant level.
- **Potentially Significant Impact**: An impact that may have a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (CEQA Guidelines Section 15382); however, the occurrence of the impact cannot be immediately determined with certainty.

I. AESTHETICS

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a valued vista or panoramic setting that can be seen from a particular vantage point or along a travel corridor. Generally, public views, protected scenic views, and scenic views from public gathering areas or along roadway and trail corridors have heightened importance. The Town of Mammoth Lakes is situated in a dramatic mountain valley surrounded by majestic peaks that dominate the visual field. Topography varies from flat meadowlands to glacial moraines to the chutes and cirque of the Sherwin Range. The landscape includes areas of evergreens, sage, aspens, and other native plants rooted primarily in till and talus. The urbanized portions of the Town are generally located between 7,800 and 8,600 feet above mean sea level (amsl). Native vegetation includes pine forest and meadow, with riparian growth along the banks of Mammoth Creek, Sherwin Creek, and occasional springs and seeps. Barren rock outcroppings, talus slopes, chaparral, and pine forests all add texture and color. The rugged terrain of the area provides both excellent viewpoints and view restriction, depending upon the viewer's location.

Included among the important viewpoints within the area are Mammoth Crest, Crystal Crag, Lake Mary Road, the ski slopes on Mammoth Mountain, Lincoln Mountain, Sherwin Mountain, SR 203 east of Old Mammoth Road, and U.S. Highway 395 (a designated scenic highway) along its entire length in the Mammoth Lakes area. The Mammoth Lakes General Plan identifies several major view corridors that provide scenic views of natural features such as Mammoth Mountain and the Sherwins Range.[1] Mammoth Mountain and portions of the Sierra Nevada mountain range and White Mountains can be seen from nearly all points within the Town. Open meadow and sagebrush characterize the southeast portion of Town's broader Planning Area.

[1] *Town of Mammoth Lakes General Plan, Figure 1, Major View Corridors and Vistas. 2007.*

The Town's urban development provides a visual contrast to the dramatic mountain setting and to its own rustic environment. Roads, buildings, utility poles, and other man-made structures provide forms, textures, and colors that contrast with the natural environment and are often visible from distant vantage points (for example, the shopping center parking lots along Main Street and Old Mammoth Road are discernable from Mammoth Mountain).

The PRMP outlines recommendations that are intended to enhance existing parks/recreation facilities, as well as provide new park/recreation facilities in Mammoth Lakes. New facilities identified in the PRMP could maintain open and natural settings, such as picnic areas or nature sites, or require the development of buildings, such as a multi-use cultural facility. Uses could also include a new event and performance venue that could accommodate public gatherings. Other facilities may include picnic shelters and sports fields and courts. No specific sites are called out as locations for future venues; however, the PRMP identifies numerous opportunity sites to accommodate future recreational needs within the Town based on the recommended LOS standards. Opportunity areas are primarily located within the UGB, or as with Mammoth Creek Park East, adjacent to the UGB. The PRMP also identifies areas of future expansion dispersed throughout the UGB in areas such as Snowcreek VIII, The Sherwin, Shady Rest/Hidden Creek, and Clearwater, town-owned and federal public lands (i.e., National Forest holdings); other public resources such as school and County owned properties; and public-private partnerships with the Town's two golf courses. The PRMP also identifies eleven sites within the UGB as areas "potentially needing a park."[2]

New and expanded facilities are expected to be low-rise in character and no specific facilities are expected to require tall structures that would interrupt or block long-range views across the town. Because of the low-rise character of recreational facilities, scenic vistas would continue to be available through street corridors and from important viewpoints. In addition, new and expanded facilities under the PRMP would be widely dispersed throughout the UGB and would not all be visible within a single field of view. Because new or expanded facilities under the PRMP would be generally low-rise and widely dispersed, impacts with respect to scenic vistas would be less than significant. (Please refer to Response No. 1.c, below regarding potential impacts with respect to visual character and the visual quality of sites and their surroundings.)

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state-designated scenic highway?

Less Than Significant Impact With Mitigation Incorporated. Under the PRMP, the development of potential structures, such as a recreational center/gym, tennis courts, indoor swimming pool (in the UGB), hockey rink, and events venue would not be located between the UGB and the U.S. 395, a designated scenic highway. Because of the distance of future structures to the west of the highway, these would be minimally (if at all) visible from the highway.

However, in the case of Whitmore Regional Park, it is located less than one-half mile to the east of U.S. Highway 395 at approximately the same elevation and is visible from portions of U.S. Highway 395. In addition, Benton Crossing Road, which would provide access to Whitmore Park, is a designated Mono County scenic highway. Therefore, future development at Whitmore Regional Park under the PRMP is subject to

[2] *Town of Mammoth Lakes Draft Parks and Recreation Master Plan, Figure 3.*

regulations under both the State Scenic Highway (S-C district) and the County's Scenic Combining District. The possible swimming pool enclosure at Whitmore Regional Park under the PRMP has the potential to be visible from these scenic routes, as well as any other development of recreational facilities under the PRMP in this location. In addition, the potential exists for more frequent use of the park's playing fields and the temporary enclosure of the Whitmore Park swimming pool. **Mitigation Measure AES-1,** below requires that future development under the PRMP conform to all standards for State Scenic Highway (S-C District) and the Scenic Combining District. With the implementation of **Mitigation Measure AES-1**, Project impacts with respect to the U.S. Highway 395 and Benton Road scenic roadway designations would be reduced to a less than significant level. Because conditions are similar relative to the proximity of the scenic routes, **Mitigation Measure AES-1** is similar to mitigation provided for the Mono County Whitmore Park Track and Sports Field Project (*Whitmore Park Track and Sports Field Initial Study/Mitigated Negative Declaration* (IS/MND), October 13, 2010).

Although not visible from a designated scenic highway, trees within the Town could be considered as scenic resources. Implementation of the PRMP may require removal of trees in order to construct new facilities. The Town's Municipal Code regulates tree removal in Commercial, Residential and Industrial zones by requiring tree removal to be minimized to the extent feasible, and allowing the Planning Director to require replacement planting for trees that have been removed. Although the Open Space and Public/Quasi Public Zones do not include standards for tree removal, the Municipal Code would allow a similar performance standard as the Residential, Commercial and Industrial Zones to be applied. (Municipal Code Section 17.28.330 and 17.28.370).

Indirect and direct visual impacts to scenic resources could also occur as new facilities are constructed under the PRMP within the Town. Indirect visual impacts to scenic resources would be minimized through compliance Municipal Code Section 17.132.120, which regulates the aesthetic character of the Town through Design Review requirements. The Design Review requirements would apply to most new facilities and structures developed with parks and recreation areas. Among the purposes of Design Review is to:

- To implement the goals, policies and objectives of the General Plan;
- To regulate the design, coloration, materials, illumination and landscaping of new construction, renovations, and signage within the Town in order to maintain and enhance the image, attractiveness and environmental qualities of the Town;
- To ensure that property development or redevelopment and building construction or renovation do not detract from the value or utility of adjoining properties as a result of inappropriate, inharmonious, or inadequate design;
- To prevent indiscriminate destruction of trees and natural vegetation, excessive or unsightly grading, indiscriminate clearing of property, and destruction of natural significant landforms;
- To ensure that the architectural design of structures and their materials and colors are appropriate to the function of the project and are visually harmonious with surrounding development and natural landforms, trees, and vegetation; and
- To ensure that the location, size, design, and illumination of signs, their material, and colors are consistent with the scale and design of the building to which they are attached or which is located on the same site, and to assure that signs are visually harmonious with the surrounding environment.

Design review may be approved administratively, or may require Planning Commission approval depending on the nature of the project. Typically, Planning Commission approval is required for new construction or major renovation of large multifamily residential or commercial projects; minor renovations such as repainting or modifying exterior finishes will only require Planning Director approval.

Conformance with the Town's tree removal and Design Review requirements would reduce potentially significant direct and indirect impacts to scenic resources within the Town to a less than significant level.

Mitigation Measures

AES-1 Any future changes at Whitmore Regional Park under the PRMP shall conform to all standards for the Scenic Combining District and State Scenic Highway (S-C district):

a. Visually offensive land uses shall be adequately screened through the use of extensive site landscaping, fencing, and/or contour grading.

b. The natural topography of a site shall be maintained to the extent possible. Earthwork, grading, and vegetation removals shall be minimized. Existing trees and native ground cover should be protected during construction.

c. All site areas disturbed during Project construction shall be revegetated and maintained with plants that blend with the surrounding natural environment, preferably local native plants (drought resistant indigenous plants are encouraged), or other permanent erosion control installed. A landscape plan shall be submitted and approved for all projects.

d. Existing access roads shall be utilized whenever possible. Construction of new access roads, frontage roads, or driveways shall be avoided except to provide safe access to the Project's facilities.

e. New structures shall be situated on the property so as, to the extent feasible, their visibility from the state scenic highway is minimized. Structures shall be clustered where possible, leaving remaining areas in a natural state, or landscaped to be compatible with the scenic quality of the area.

f. The number, type, size, height, and design of on-site signs shall be regulated according to the applicable county sign regulations. Signs shall be compatible with the natural surroundings in color, shape, and scale. No sign shall be placed or constructed in such a manner that it silhouettes against the sky above the ridgeline or blocks a scenic viewshed.

g. The design, color, and materials for buildings, fences and accessory structures shall be compatible with the natural setting.

- Roofs visible from U.S. Highway 395 shall be a dull or matte finish and in dark muted colors.
- Vertical surfaces of structures should not use contrasting colors or materials and shall blend with the natural surroundings. Dark or neutral colors found in immediate surroundings are strongly encouraged for vertical surfaces and structures.

h. Fencing and screening shall not contrast in color, shape, and materials with the natural surroundings. The use of landscaping to screen utility areas and trash containers is strongly recommended.

i. All new utilities shall be installed underground.

j. Exterior lighting shall be shielded and indirect and shall be minimized to that necessary for security and safety. Light sources in exterior fixtures shall be shielded, down-directed, and not visible from State Scenic Highway 395 or Benton Crossing Road.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact With Mitigation Incorporated. Future development and/or expansion of individual parks and recreational sites have the potential to change the visual quality or character of development sites and their surroundings. For example, construction activities involving grading, soils stockpiling and general disruption would potentially create a condition that contrasts with the natural setting or with the adjacent land uses. Other potential impacts that could affect the visual character of a site and its surroundings include design of park facilities or buildings that contrast with the natural setting, removal or trees, or poor maintenance of future parks and recreational facilities.

Goal 1 of the PRMP is to "Maintain parks and open space within and adjacent to town for outdoor recreation and contemplation." Proposed Policy 1 (for Goal 1) is applicable to scenic quality and states: "Protect the scenic beauty and natural resources of Mammoth Lakes." This policy reflects the community's vision for future recreational facilities (see PRMP, Appendix 3, Community Values and Goals, Community Vision 2) applicable to scenic and aesthetic resources. Objectives under Community Vision 2 that are applicable to the protection of scenic resources are (1) sustainability and continuity of its unique relationship with the natural environment and (2) protecting the surrounding natural environment (3) establishing exceptional standards for design and development that complement and are appropriate to the Eastern Sierra Nevada mountain setting and the community's sense of a "village in the trees" with small town charm, (4) improving and enhancing the community's unique character by requiring a high standard of design in all development in Mammoth Lakes, (5) designing the man-made environment to complement, not dominate, the natural environment, (6) ensuring safe and attractive public spaces, including sidewalks, trails, parks and streets, and (7) being stewards of natural and scenic resources essential to community image and character.

To ensure that Policy 1 would be carried out in accordance with the Community Vision and to ensure a high degree of visual character and quality of future project sites and their surroundings, **Mitigation Measures AES-2** through **AES-5** are recommended.

In addition, as discussed in Response No. I.b, above, compliance with the Town's tree removal and Design Review requirements would further ensure that potential direct and indirect impacts to the existing visual character or quality of the Town and its surroundings are reduced to a less than significant level. Implementation of **Mitigation Measure AES-1** would also ensure that visual impacts in Whitmore Regional Park are minimized.

With implementation of the prescribed mitigation measures and compliance with the Town's existing regulations and requirements, potentially significant impacts with respect to visual character would be reduced to a less than significant level.

Mitigation Measures

Refer to **Mitigation Measure AES-1**. The following mitigation measures are also prescribed.

AES-2 Prior to issuance of grading or building permits, building and site plan review shall be conducted for all development sites to ensure consistency with the Town's Design Guidelines. Where structures or parking areas would be developed, consideration shall be given to building and structure heights and setbacks, natural setback areas/buffer zones, and parking lot design and placement. Design and architectural treatment of retaining walls, colors, and materials shall conform with the Design Guidelines including in aspects such as use of indigenous materials, such as timbers rocks and stones, for architectural or landscape treatments, and selection of colors and materials that are harmonious with the surrounding environments. Site plans for future projects shall also be reviewed relative to tree preservation and landscaping requirements and guidelines including replacement tree plantings, and use of plant materials that are endemic to the mountain region to help maintain a natural appearance along the site boundaries and provide a visual buffer. The performance standard for this measure is to ensure that proposed structures, landscaping and other improvements blend in with the natural environment to the maximum extent feasible, and are consistent with the Town's Design Guidelines.

AES-3 During construction, the applicant or the applicant's contractors shall screen or locate equipment, stockpiles, and staging areas out of direct public view to the extent feasible, to reduce degradation of the visual character of the site and its surroundings.

AES-4 Where landscaping is required to replace native vegetation, a landscape plan shall be implemented that avoids sharp contrasts between new and existing vegetation in any adjacent undeveloped areas are avoided. Plant species that could become invasive and migrate into undeveloped areas surrounding the any development sites shall be strictly prohibited and the plant palate shall emphasize where appropriate native, low-maintenance and/or drought tolerant species suitable for the Eastern Sierra climate.

AES-5 Planting of landscaped areas, and revegetation of disturbed areas, shall be undertaken as soon as feasibly possible following any grading to avoid prolonged view degradation. Landscaping shall be routinely maintained to a high standard throughout the life of the respective parks and recreational facilities.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact With Mitigation Incorporated. The PRMP sets forth a program that includes a broad range of recreational uses that could contribute to ambient night light and glare. Uses that are anticipated to require lighting for security, way-finding, or evening field events include picnic shelters, tennis courts, soccer/multi-use fields, unspecified ball fields, outdoor events venue, band shell/amphitheater, recreation center, ice hockey rink, and indoor swimming pool. It is expected that additional parking would be needed to serve these uses. Nighttime recreational activity would also increase vehicle activity and potential glare from vehicle headlights. All new lighting has the potential to create glare that would affect nighttime views in the area.

Daytime glare could also be generated by future buildings, as result of reflected sunlight off any shiny building surfaces. The Town of Mammoth Lakes General Plan, *Night Sky, Light Pollution, and Glare* objective provides standards for outdoor lighting to prevent nuisances caused by unnecessary light intensity, direct glare and light trespass, and to protect the ability to view the night sky by restricting unnecessary upward projection of light. All outdoor lighting fixtures, including recreational lighting fixtures, are required to conform to these regulations. Policies applicable to the Project include:

- Policy C.5.A. Require outdoor light fixtures to be shielded and down-directed so as to minimize glare and light trespass.
- Policy C.5.B. Enforce removal, replacement or retrofit of non-shielded or non-down-directed light fixtures that contribute to glare and light pollution.

These policies are implemented by Municipal Code Chapter 17.34: Outdoor Lighting, which incorporates detailed recommendations concerning the type, design and intensity of outdoor lighting so as to avoid glare and protect views of the night sky. These standards are applicable in all zones, and to all land uses, including recreational facilities.

The PRMP also indicates the more frequent use of the Whitmore Regional Park sports fields and the potential temporary enclosure of the Whitmore Park swimming pool, which are located within the Mammoth/June Airport Land Use Plan (ALUP) for the Mammoth Yosemite Airport. The roof of the temporary enclosure has the potential to reflect sunlight or, if facilities see additional use during evening hours, to introduce additional night lighting to the Whitmore Park area. The ALUP prohibits any use in the ALUP planning area that would cause sunlight or lighting to be reflected toward an aircraft. Finally, the PRMP contemplates new indoor recreation facilities such as an indoor hockey rink or aquatics facility that could generate new sources of light from their windows.

To ensure that glare from lighting or reflected sunlight would not adversely affect views or the safe operation of motor vehicles or aircraft, **Mitigation Measures AES-6** through **AES-11** are recommended for all parks and recreation facilities constructed pursuant to the PRMP. With the implementation of these mitigation measures, potentially significant impacts with respect to light and glare would be reduced to a less than significant level.

Mitigation Measures

AES-6 Construction-related lighting shall be limited to lighting necessary for security and safety purposes.

AES-7 The Town of Mammoth Lakes and shall review development plans and evaluate different options for ball-field and other outdoor light fixtures, with regard to height, design, number, wattage, and placement, to ensure compliance with the Town's Outdoor Lighting Ordinance, while maintaining lighting sufficient for the proposed use.

AES-8 The Town of Mammoth Lakes shall consider restricting the hours of outdoor field and court use to limit the ambient light increases from these sources.

AES-9 Where playing fields or other special activity areas would be illuminated, lighting fixtures shall be mounted, aimed, and shielded so that their beams fall within the primary playing area and immediate surroundings, and so that no significant off-site light trespass is produced.

AES-10 Field lights and primary light sources shall be turned off as soon as possible following the end of an event or scheduled activity. Where feasible, a low-level lighting system shall be used to facilitate patrons leaving the facility, cleanup, nighttime maintenance, and other closing activities.

AES-11 Building plans shall be reviewed to determine reflectivity of surface materials and trim. Materials determined to have high reflectivity shall be replaced by materials with low-reflectivity. Where feasible, window glass that minimizes transmission of interior light so the outside should be used for new structures that will have evening or nighttime activities as part of their operations.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire protection regarding the state's inventory of forest land, including the Forest and Range Assessment of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. There are no prime or unique farmlands or other agricultural operations within the PRMP area that would be impacted by implementation of the PRMP. In addition, the PRMP would not conflict with the existing zoning for an agricultural use, or a Williamson Act Contract. Thus, no impact would occur with respect to agricultural uses or a Williamson Act Contract.

b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. Lands proposed for use under the PRMP, including the PRMP's trails component, are not located within areas zoned for agricultural use, or held from future development under a Williamson Act Contract.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Less Than Significant Impact. Implementation of the PRMP may increase the Town's use of U.S. Forest Service (USFS) Inyo National Forest holdings for recreational purposes. This may include trail components in USFS lands and projects, such as an expansion of Mammoth Creek Park East (a USFS property used by the Town under an existing Special Use Permit). Special Use Permits and Special Use Authorizations required

for the use of USFS lands for non-commercial recreational purposes are allowed under established National Forest Management Act (NFMA) procedures which require review and possible environmental documentation. Temporary Use permits for special events may also be allowed under specified circumstances. NFMA procedures for the use of Inyo National Forest land for park and recreational uses would be consistent with NFMA requirements and would not require rezoning or conflicts in zoning between recreational uses and forest land. The Project would not conflict with timberland uses (as defined by Public Resources Code Section 4526) or with timberland production. Therefore, impacts with respect to forest lands and timberlands would be less than significant.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

Less Than Significant Impact. Implementation of the PRMP would be consistent with the designated use of Inyo National Forest lands for recreational purposes, as described in the Inyo National Forest Land and Resources Management Plan (LRMP) for Management Areas 8 (Mammoth Escarpment) and 9 (Mammoth). Forest uses under the LRMP include providing for trail interfaces and allowing further development of Mammoth Creek Park East. Because any future use of USFS lands under the PRMP would be carried out in compliance with the requirements of the LRMP for the use of Inyo National Forest lands, the Project would not cause the loss of forest land or conversion of forest land to non-forest use. Therefore, impacts with respect to forest lands would be less than significant.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. As discussed in Response No. II (a-b), above, the PRMP would not result in a significant conversion of farmland to a non-agricultural use. Therefore, the PRMP would have no impact with respect to farmland conversion.

III. AIR QUALITY

Where available, the significance criteria established by the Great Basin Unified Air Pollution Control District (GBUAPCD) or air quality management plan may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the AQMP or Congestion Management Plan?

Less Than Significant Impact. The PRMP area is located within the 13,975 square miles Great Basin Unified Air Pollution Control District (GBUAPCD), which includes all of Inyo, Mono and Alpine counties. The GBUAPCD was formed under a joint powers agreement between Inyo, Mono and Alpine Counties for the purpose of meeting and enforcing applicable Federal, State and local air quality regulations. While air quality in this area has improved, the GBUAPCD requires continued diligence to meet air quality standards.

Effective January 23, 2005, the Mono County portion of the GBVAB has a nonattainment designation for O_3 (State standard only), and a nonattainment designation for the federal and State PM_{10} standards. Although Mono County is categorized as nonattainment of the State O_3 standard, there is no ozone implementation plan for attaining the ozone standard in Mono County, nor is one required as outlined in the 2001 CARB Ozone transport review. Instead, the document states "Transport from the central portion of the (San

Joaquin) Valley is responsible for ozone violations in Mammoth Lakes."[3] A Draft Air Quality Management Plan (AQMP) for the Town was released on January 19, 1990, identifying PM_{10} sources and mitigation strategies intended to attain the NAAQS. The AQMP identifies emissions from wood-burning stoves and fireplaces and traffic-related road dust and cinders as the primary causes leading to exceedances of the PM_{10} standard in the winter, exacerbated by the substantial influx of visitors to the Mammoth Lakes area during the ski season. The combination of periods of meteorological stagnation and increased visitation to the ski resorts result in violations of PM_{10} standards. The AQMP includes a number of control strategies, including a ban on new wood-burning devices, requirements to retrofit existing wood-burning devices, and a Town-wide limit on vehicle miles traveled (VMT).

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. The Project area is subject to air quality regulations developed and implemented at the federal, state, and local levels. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of the Federal Clean Air Act (CAA). Some portions of the CAA (e.g., certain mobile source and other requirements) are implemented directly by the USEPA. Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

Pursuant to the CAA, the GBUAPCD is required to reduce emissions of criteria pollutants for which the Great Basin is in non-attainment. The Great Basin Valley Air Basin (GBVAB) is designated as having attained state standards for all pollutants except ozone and particulates PM_{10} (24-hour) and having attained all federal standards except 24-hour PM_{10}. Therefore, discussion of impacts for this Project will focus on those pollutants. However, it should be noted that although the Mammoth Lakes nonattainment area has not been officially redesignated, ambient levels have not exceeded the national PM_{10} standards for many years.[4] Because the Project is located within a nonattainment area, certain Project-related activities may be subject to emission control strategies contained within the Town of Mammoth Lake's PM_{10} AQMP.[5] As established above, there is no ozone AQMP applicable to development projects within the Town.

The GBUAPCD utilizes a permitting process to regulate emissions. The following list includes some of the rules and regulations that may apply to the Project:

- GBUAPCD Rule 200-A and 200-B. Permits Required: Before any individual builds or operates anything that may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants, such person must obtain a written authority to construct and permit to operate from an Air Pollution Control Officer.
- GBUAPCD Rules 401 and 402. Fugitive Dust and Nuisance: Rule 401 requires that airborne particles remain at their place of origin under normal wind conditions. Proper mitigation techniques approved by the GBUAPCD must be implemented to ensure that fugitive dust is contained. This does not apply to dust emissions discharged through a stack or other point source. Rule 402 states that any air discharge that may cause injury or detriment, nuisance or annoyance, or damage to any

[3] *Town of Mammoth Lakes, General Plan Update EIR, October 2005, p. 4-23.*

[4] *Great Basin Valleys Air Basin (Great Basin Unified APCD) Attainment, http://www.arb.ca.gov/pm/pmmeasures/pmch05/gbv05.pdf*

[5] *Air Quality Management Plan for the Town of Mammoth Lakes, Prepared for the PM-10 State Implementation Plan by The Great Basin Unified Air Pollution Control District and the Town of Mammoth Lakes; November 30, 1990.*

public property or considerable number of people is regulated. This rule discusses the health and safety issues that may interfere with public and private areas surrounding the site.

- GBUAPCD Rules 404-A and Rule 404-B. Particulate Matter and Oxides of Nitrogen: Rule 404-A states that a person shall not discharge from any source whatsoever, particulate matter in excess of 0.3 grains per standard dry cubic foot of exhaust gas. Rule 404-B states that a person shall not discharge from fuel burning equipment having a maximum heat input rate of more than 1.5 billion BTU per hour (gross), flue gas having a concentration of nitrogen oxides calculated as Nitrogen Dioxide (NO_2) in parts per million of flue gas by volume at 3 percent oxygen: 125 ppm with natural gas fuel, or 225 ppm with liquid or solid fuel. Additionally, a person shall not discharge from sources other than combustion sources, nitrogen oxides, calculated as nitrogen dioxide, 250 parts per million (ppm) by volume.
- GBUAPCD Rule 431. PM Reduction Control Measures: Requirements include vacuum street sweeping of wood stove cinders, requires vehicle miles traveled (VMT) reduction measures for new developments, and limits peak VMT in the Town to 106,600 VMT.

The Town of Mammoth Lakes General Plan was updated in 2007 wherein implementation measures were incorporated to directly or indirectly reduce PM_{10} emissions in accordance with the PM_{10} AQMP. The AQMP-mandated reduction measures have been incorporated in the Town of Mammoth Lakes Municipal Code (Section 8.30).

- Chapter 8.30 of the Municipal Code (Town Particulate Matter Ordinance): The Town shall, in its review of proposed development projects, include a limit of 106,600 vehicle miles traveled (VMT), incorporate street sweeping measures, and regulations on wood-burning stoves and fireplaces, consistent with applicable GBUAPCD Rule 431 listed above.

Construction activities can result in emissions of particulate matter. Construction and repair of recreational facilities, parking lots, and amenities (restrooms) would require earthmoving such as grading and trenching. As shown below in Response III.(b), construction emissions impacts would be less than significant after compliance with applicable rules and regulations and implementation of the prescribed mitigation measures.

The Project is designed to accommodate existing and future community demand for parks and recreation services. Future demand would be linked to the buildout of the General Plan and it is not related to the expansion of existing or development of new parks and recreational facilities. As described in Response No. XVI (c) (traffic generation), below, the Project would not increase population or visitors in the Mammoth area from other communities or other regions. Some trips that are currently made to other activities outside the urbanized area or across the urban area may shift to the new facilities in or near the urbanized area, or facilities closer to users' residences. The trails component of the PRMP would also potentially reduce vehicle miles by improving linkages and encouraging greater use of alternatives to motorized transportation. The PRMP is expected to roughly offset the potential increase in vehicle miles traveled (VMT) (a source of mobile emissions) through potentially improved access (proximity) and use of trails and, therefore, is not expected to result in a significant increase in VMT. In addition, the Project would be required to comply with GBAUPCD rules and Town ordinances related to the reduction and control of emissions. With compliance with existing GBAUPCD and Town ordinances, the Project would not conflict with implementation of the AQMP.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact With Mitigation Incorporated. Construction activities required for potential parks and recreational facilities have the potential to impact air quality through the use of heavy construction equipment, earth-moving activities, and through vehicle trips of construction workers traveling to and from the Project sites. In addition, fugitive dust emissions would result from construction activities. Mobile source emissions, primarily PM and NO_X, would result from the use of construction equipment such as bulldozers, loaders, and cranes. Construction emissions can vary from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Neither the Town of Mammoth Lakes nor the GBUAPCD have established numerical air quality significance thresholds for quantitatively determining air quality impacts. CEQA allows Lead Agencies to rely on standards or thresholds promulgated by other agencies. Thus, projects in the GBVAB have recently used the standards of the Mojave Desert AQMD in prior CEQA reviews (such as the Rock Creek Canyon Specific Plan EIR, Mono County, July 2010). Because the air quality and pollutant attainment status in portions of the Mojave Desert Air Basin (MDAB) are similar to those of the GBVAB, the thresholds set for MDAB by the Mojave Desert Air Quality Management District (MDAQMD) are considered adequate to serve as significance thresholds for the Project. Per the *MDAQMD- CEQA and Federal Conformity Guidelines*, regional NO_x emissions from both direct and indirect sources exceeding 137 pounds per day would create a significant air quality impact. In addition, the threshold for a significant air quality impact regarding PM_{10} is 82 pounds per day. Emissions from intense construction activity would contribute to Project-related impacts regarding NO_x and PM_{10}. As such, below are analyses of Project-related impacts regarding NO_x and PM_{10}. Given the nature and scope of the Project, construction emissions associated with $PM_{2.5}$, VOC, CO and SOx are expected to result in less than significant air quality impacts, and would be further reduced with implementation of **Mitigation Measures AQ-1 to AQ-8**.

On a program-level, construction activities for the improvement projects would be completed over the course of several years (through the year 2025) with implementation based on available funding and Town approval. A detailed programmatic construction schedule is not available at this time and actual construction may proceed at a less intensive pace. Daily emissions would be respectively reduced if construction were drawn out over a longer time period. Conversely, multiple construction crews operating at maximum intensity simultaneously within the Town have the potential to exceed regional NO_x thresholds. Thus, **Mitigation Measure AQ-1** is prescribed to limit maximum daily NO_x construction emissions resulting from the PRMP in order to reduce potentially significant impacts to a less than significant level.

Prior to approval of the project plans and specifications, the Public Works Director, or his designee, shall confirm that the plans and specifications stipulate that, in compliance with GBUAPCD Rule 401, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures, as specified in the GBUAPCD Rules and Regulations. In addition, GBUAPCD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of **Mitigation Measures AQ-2 to AQ-8** would reduce short-term fugitive dust impacts on nearby sensitive receptors.

Overall, potentially significant construction impacts would be reduced to a less than significant level with compliance with applicable GBUAPCD rules and regulations and implementation of the prescribed mitigation measures.

Operation impacts would be based on VMT. As described under Response No. XVI (c), below, the increase in VMT (a source of mobile emissions) would be roughly offset by the reduction in VMT by the closer proximity of facilities to many community users and the increase in non-auto mode travel throughout Town (trails component of the PRMP). The Project would not result in new long-term operational sources, nor would it result in a significant increase in VMT or respective mobile emissions. Since the Project is not expected to cause intersection and roadway conditions to exceed adopted standards, a quantitative analysis is not warranted. Operational impacts would be less than significant.

Mitigation Measures

AQ-1 The Town shall limit PRMP construction activities in the following manner so as to ensure exhaust emissions shall not exceed the established daily thresholds for gaseous pollutants:

No more than 20 pieces of construction equipment operating simultaneously per 8-hour day, or 16 pieces operating 10 hours per day, averaging 200 hp rated engine capacity. Each on-road delivery or haul truck traveling approximately 200 miles per day equals one piece of non-road equipment, and shall be included in the daily limit.

AQ-2 All active portions of the construction site shall be watered to prevent excessive amounts of dust.

AQ-3 On-site vehicles' speed shall be limited to 15 miles per hour (mph).

AQ-4 All on-site roads shall be paved as soon as feasible or watered periodically or chemically stabilized.

AQ-5 All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust; watering, with complete coverage, shall occur at least twice daily, preferably in the late morning and after work is done for the day.

AQ-6 If dust is visibly generated that travels beyond the site boundaries, clearing, grading, earth moving or excavation activities that are generating dust shall cease during periods of high winds (i.e., greater than 25 mph averaged over one hour) or during Stage 1 or Stage 2 episodes.

AQ-7 All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.

AQ-8 The Town shall limit the extent of mass grading for all simultaneous PRMP construction and maintenance activities to no more than 5 acres of active disturbance daily.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact With Mitigation Incorporated. A significant impact would occur if the Project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the GBVAB is currently in nonattainment for ozone and PM_{10}, emissions from this Project could contribute to an existing or projected air quality standard exceedance.

Implementation of the overall PRMP would result in an increase in short-term emissions related to construction, and a negligible increase in long-term emissions related to continued recreational uses and support services. Construction is expected to be periodic, and may extend through 2025 (based on available funding and Town approval). A detailed programmatic construction schedule is not available at this time and actual construction may proceed at a less intensive pace. Simultaneous construction of up to two of the largest project components has the potential to generate emissions of ozone precursors or PM_{10} in excess of daily thresholds. However, implementation of control strategies to reduce PM_{10} and **Mitigation Measures AQ-2 through AQ-8** would further minimize construction emissions. In addition, heavy earthmoving activities are not expected to occur during the winter when ambient PM_{10} levels are elevated. Components of the PRMP, such as a linking trail system are supportive of long-term AQMP strategies to reduce VMT. Therefore, the Project would not contribute to a cumulatively considerable net increase in nonattainment pollutants and no additional mitigation measures are necessary.

Mitigation Measures

Refer to **Mitigation Measures AQ-2 to AQ-8**. No additional mitigation measures are necessary.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. Much of the PRMP would be developed within the UGB and close to residential neighborhoods. Therefore, sensitive receptors would be located in close proximity to proposed improvement sites. PM_{10} and $PM_{2.5}$ concentrations are expected to occur primarily from fugitive dust emissions during site mass grading and excavation activities (buildings such as a recreation center/gym, indoor swimming pool, or hockey rink, and outdoor facilities such as soccer and multi-use fields, running track, tennis courts) and grading and, to a lesser degree, during fine grading and paving. Rule 401 requires that airborne particles remain on the site from which they originate under normal wind conditions. **Mitigation Measures AQ-2** through **AQ-8**, above would be implemented to ensure that fugitive dust would be contained.

In addition to criteria and precursor pollutants, TAC emissions are also created by the combustion of fossil fuels. Diesel Particulate Matter (DPM) has been recognized by the State of California as a human carcinogen for over 10 years. Diesel powered equipment would be used during grading and excavation activities and, as such, DPM is of potential concern because of its toxicity and prevalence in emission exhaust. The Office of Environmental Health Hazard Assessment (OEHHA) recognizes the potential for carcinogenic and non-cancer long-term effects in humans from exposure to DPM and has developed a methodology for estimating health risk from TAC pollutants such as diesel exhaust. No non-cancer acute (short-term) effects have been recognized for DPM.

OEHHA cancer risk factors assume a continuous exposure over a 70-year time frame; however, the proposed priority projects would require (at most) one year of construction, and would be spread out sporadically as funding becomes available over the course of ten years or more. Neither OEHHA nor the GBUAPCD have developed guidelines to accurately and scientifically estimate the incremental increase in cancer risk for such short exposure duration. Additionally, the GBUAPCD does not require a health risk assessment for short-term construction emissions. Therefore, it is not meaningful to evaluate long-term cancer impacts from construction activities which occur over a short duration. In addition, there would be no residual emissions after construction and, thus, no corresponding individual cancer risk. As such, Project-related toxic air contaminant emission impacts during construction would be less than significant.

Operational emissions have the potential to impact local air pollutant levels at nearby receptors. An increase in vehicular travel may generate localized "hot spots," localized areas in the project vicinity where sensitive receptors (pedestrians) located near to roadways and intersections may be exposed to elevated ambient pollutant levels. The monitoring station most representative of the Project Area is the Mammoth Lakes-Gateway Home Center Monitoring Station, located on Highway 203 and Old Mammoth Road. Although the monitoring station has not recorded any exceedance of the State or Federal CO standards, elevated CO concentrations due to heavy traffic volumes and congestion at specific intersections or roadway segments can lead to elevated localized levels of CO.

Overall, the Project is not expected to cause an increase in VMT over the course of a day that would exacerbate street and intersection service levels (LOS) or result in CO cause hot spots due to traffic congestion. Therefore, the Project is not expected to cause new long-term stationary emissions sources or cause a significant net increase in vehicle trips. Thus, CO impacts from operation would be less than significant.

Mitigation Measures

Refer to **Mitigation Measures AQ-2 to AQ-8**. No additional mitigation measures are necessary.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. During Project-related construction activities, various diesel-powered vehicles and equipment could create minor odors. These odors are not likely to be noticeable beyond the immediate vicinity and would be temporary and short-lived in nature. Therefore, construction odor impacts would be less than significant. Long-term odors are typically associated with industrial projects involving use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves no elements related to these types of uses. Nonetheless, it is acknowledged that over snow vehicles, such as snowmobiles, can create odors during their operation. However, snowmobiles typically operate in areas outside of the UGB in open areas or at distances from existing populated areas (i.e., residential uses) where substantial numbers of people are not exposed to objectionable odors. Therefore, less than significant long-term odor impacts would occur with Project implementation.

IV. BIOLOGICAL RESOURCES

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated. Special status species are located throughout the region encompassing the PRMP. According to the *Biological Resources Assessment for the Trails System Master Plan and Parks and Recreation Master Plan* (*Biological Resources Assessment*) by PCR Services Corporation (June 2011), some parks and open space under the PRMP could potentially contain sensitive or special status species. The *Biological Resources Assessment* is on file and available for review at the Town of Mammoth Lakes. Parks with the potential to contain sensitive species include Mammoth Creek Park East, Mammoth Creek Park West, Town-owned open space along Mammoth Creek, and Whitmore Regional Park. The Mammoth Creek Park East, Mammoth Creek Park West, and Town-owned open space along Mammoth Creek contain or are dominated by alder-willow riparian scrub associated with Mammoth Creek and its banks. Alders, quaking aspen and several species of willows form the over-story while the understory consists of herbaceous riparian species. Vegetation beyond the banks of Mammoth Creek consists of basin sagebrush scrub. Potential special status species in these parks include the willow flycatcher, Sierra Nevada mountain beaver, and other sensitive riparian wildlife species. Construction activities in proximity to habitat area could disturb nesting birds in violation of the MBTA and State Fish and Game Code Section 3503 et seq. **Mitigation Measures BIO-1** through **BIO-5**, below, are recommended to address impacts to special status species and nesting birds. With the implementation of these mitigation measures, potentially significant impacts with respect to special species would be reduced to a less than significant level.

At Whitmore Park, four special-interest plant species, Long-Valley milkvetch (CNPS list 1B.2), Inyo phacelia (CNPS list 1B.2), alkali ivesia (CNPS list 2.2), and smooth saltbush (CNPS list 1) may occur on site as marginally suitable habitat is present. These species have the potential, albeit low, to occur on site due to the presence of degraded Great Basin sagebrush habitat. A botanical survey of the future site of the Whitmore Track at Whitmore Regional Park was conducted on July 7, 2011, and did not find any occurrences of these plant species, although one additional species, golden violet (*Viola purpurea ssp. aurea*) was found in the study area. The three individuals found were all located outside of expected disturbance areas associated with the physical expansion of existing uses (i.e., the future running track) at Whitmore Park. Further information is provided in the Botanical Survey report.[6] With regard to special status wildlife, the greater sage grouse is reported to use this Project component area and adjoining habitat areas "heavily" according to a comment letter, dated November 24, 2010, submitted by CDFG to the Town on the Initial Study and Mitigated Negative Declaration for the Whitmore Park Track and Sports Field Project. Mitigation Measures to avoid and minimize potential adverse impacts to sage grouse associated with the Whitmore Track project will be provided in the IS/MND for the Whitmore Track Project. The PRMP also foresees the potential for more frequent use of the existing playing fields at Whitmore Park and temporary enclosure of the swimming pool. Because the fields see a significant amount of existing use, spring through fall, it is not expected that more frequent use of the fields would have an adverse effect on sage grouse. However, erecting a temporary

6 *Botanical Survey of the Whitmore Park Track and Sports Field Project, Mono County, California. Stephen Ingram, July 14, 2011. (Wrong Foonote??)*

(winter) enclosure of the pool would introduce a new structure that could be perceived by nesting sage grouse as offering perching opportunities for raptors, a potentially significant impact on that species. **Mitigation Measure BIO-1** would require the Town to work with CDFG to determine if it would be feasible to erect such a structure without significantly affecting sage grouse (for example, by limiting the months that the shelter could be in place to outside of the nesting season); if not, this concept should not be considered further b y the Town.

In addition, removal of vegetation and construction activities in proximity to habitat area could disturb nesting birds. **Mitigation Measures BIO-1** through **BIO-5**, below, are recommended to address impacts to special status species and nesting birds. With the implementation of these mitigation measures, potentially significant impacts with respect to special species would be reduced to a less than significant level.

According to the *Biological Resources Assessment*, several parks, including Community Center Park, Shady Rest Park, Trails End Park, South Gateway area, and the town-owned open space (Bell-Shaped Parcel) are not likely to contain sensitive plants or animal species. However, construction activities in these areas have the potential to disturb nesting birds. Therefore, **Mitigation Measure BIO-3**, which would protect nesting birds, is recommended. With the implementation of this mitigation measure, potentially significant impacts to nesting birds would be reduced to a less than significant level.

Mitigation Measures

BIO-1 **Sage Grouse.** Prior to initiating a project to seasonally enclose the Whitmore Pool, the Town shall consult with CDFG to determine if such a structure could be erected without negatively impacting nearby nesting sage grouse, including measures such as modifying the structure's design, screening, or limiting the period during which the temporary structure may be in place. If appropriate measures acceptable to CDFG cannot be determined, the Town shall not proceed with a project to seasonally enclose the pool.

BIO-2 **Willow Flycatcher:** Prior to approval of individual projects proposed the PRMP that have the potential to significantly disturb riparian vegetation associated with Mammoth Creek and its tributaries, the Town shall require a habitat evaluation by a biologist well versed in the requirements of willow flycatcher to be completed. If no suitable habitat for the species is identified within 300 feet of construction or maintenance activities, no further measures would be required in association with the project. If suitable habitat for the species is identified within 300 feet of such activities, prior to construction the Town shall require that a survey be completed by a qualified biologist for the species according to CDFG survey guidelines (Bombay et. al., May 29, 2003). This survey protocol requires a minimum of two surveys, one between June 15-25 and one during either June 1-14 or June 26-July 15. Surveys during these periods must be at least five days apart and the second survey shall be conducted no more than one week prior to clearing of vegetation and/or the operation of motorized heavy equipment. If the surveys determine the species is not present within 300 feet of the area to be affected by an individual project, no further action shall be required. If, however, willow flycatcher is determined to be present and is using habitat within 300 feet of Project-related activities, inclusive of nesting and foraging, the Town shall consult with CDFG prior to initiating any construction activities in the area. Consultation may entail the processing of a 2081 Incidental Take Permit that includes certain conditions to avoid and/or mitigate for potential impacts to the species. Such conditions could include, but not be limited to, restrictions on the time of year for construction, noise monitoring, restrictions on equipment use, and others.

BIO-3 **Nesting Birds:** To the extent practicable, brush and tree removal activities for new parks and recreation facilities and for and major construction activity shall be initiated outside of the nesting bird season, which is generally held to be from April 1 to August 31 in the Mammoth Lakes area, and shall be carried out with no more than a two week lapse in the work. If the Town deems this to not be practicable the Town shall require a nesting bird survey by a monitoring biologist to be conducted within 300 feet (for songbirds) and 500 feet (for raptorial birds) of construction sites no more than one week prior to initiating construction to ensure no birds protected under the MBTA and/or State Fish and Game Code Section 3503 et seq. are harmed or harassed.

If no active nests of songbirds and raptors are found within 300 feet and 500 feet, respectively, of the construction site, the work may begin. If active nests are found within the survey areas the Town shall delineate a buffer zone of 300 feet and 500 feet for songbirds and raptors, respectively, around the nest. Based on the nature of the work to be performed and the equipment to be used, the monitoring biologist may reduce the buffer zone based on intervening vegetation and topography. Such buffer zones shall remain in place until the young in the nest have fledged or the nest has failed, as determined by the monitoring biologist.

All projects involving removal of trees or vegetation capable of supporting nesting birds shall be subject to the requirements of this mitigation measure.

BIO-4 **Other Sensitive Wildlife**: As discussed earlier, there are a number of wildlife species of concern to federal and State resource agencies that are known or are expected to occur in the Project area.

- For such avian species, implementation of the mitigation measure for nesting birds below will suffice in reducing impacts to these species to less than significant.

- For such amphibian species, including the Mount Lyell salamander and Yosemite toad, where suitable habitat exists for these species in the project area, a thorough search of areas to be disturbed shall be made by construction personnel trained in the methods of searching for these species. If any amphibians are found, regardless of species, they will be captured and relocated in like habitat no less than 100 feet away from construction sites.

- For such sensitive mammal species with the potential to occur in conjunction with particular project components, including the Sierra Nevada red fox, American marten, Sierra Nevada mountain beaver, Townsend's western big-eared bat, and Mount Lyell shrew, and where suitable habitat for these species exists in the project area, pre-construction surveys shall be conducted by a biologist familiar with the sign of each species to identify signs of their presence or determine their absence no more than two weeks prior to initiating construction activities. Such surveys shall encompass the area to be disturbed and the habitat within 300 feet of construction activities. Due the secretive and/or nocturnal activity patterns of these species, the following signs shall be used:

- Sierra Nevada red fox – evidence of den, normally on slopes with porous soils.
- American marten – evidence of den, normally in hollow trees or downed logs.
- Sierra Nevada mountain beaver – evidence of extensive tunnels, runways and burrows beneath dense streamside vegetation.
- Townsend's western big-eared bat – evidence of occupation by colonies in caves, mine tunnels, and buildings
- Mount Lyell shrew – evidence of nests of dry leaves or grasses in stumps or under logs or piles of brush.

If no evidence of the presence of any of these species is found, no further mitigation activities shall be required. However, if evidence of the presence of any of these species is observed, impacts will be avoided or minimized in one or more of the following ways and in consultation with CDFG and/or USFS (for facilities located on National Forest Lands): relocating facilities so as to retain a 100-foot buffer between the occupied site and construction activities and human use; suspending construction activities within 300 feet of the den, nest, or bat roosts during the breeding period, (generally held to be March 1 to July 31 for these species); verifying the actual occupation of dens, nests, or roosts by means such as placing tracking medium around the den or nest entrance or conducting a bat survey at the roost entrance at sunset; temporarily blocking the entrance of a den or nest verified to be unoccupied until after construction is completed.

BIO-5 **Sensitive Plants:** Prior to approval of individual projects proposed under the PRMP that are located in areas not previously surveyed for sensitive plant species, and that are determined to have habitat suitable to support such plants, the Town shall require that a survey be completed by a qualified botanist for sensitive plant species within the disturbance area of other proposed facilities. These surveys shall be conducted during the flowering period for the target species when they are most readily detectable. For those species with at least a low potential to occur in the Project area, this period is usually from late June to mid-August. For reference, the flowering period for individual species is provided in Table 5, *Sensitive Plant Species*, in the Project's BRA. If no sensitive plant species are located within the area of disturbance, no further action shall be required. If sensitive plant species are located within such areas and are likely to be impacted by and individual project, conservation actions shall be implemented. Such actions shall include, but not necessarily be limited to re-routing the trail alignment so as to avoid or minimize impacts to sensitive plants while preserving an off-site population that is substantially larger than the population to be impacted, developing a transplantation program, and collecting seeds to move populations elsewhere out of harm's way. These measures shall be developed in consultation with the CDFG and USFS (for facilities located on National Forest lands).

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated. According to the Biological Resources Assessment, Mammoth Creek Park West, Mammoth Creek Park East, the Town-owned open space along Mammoth Creek, and Whitmore Regional Park contain riparian habitat or other sensitive natural communities. The park and open space sites along Mammoth Creek contain moist soils and obligate hydrophytic plant species, alders, quaking aspen and several species of willows, and herbaceous riparian species. The riparian vegetation associated with Mammoth Creek is of high value to wildlife and may provide suitable habitat for special interest species. At Whitmore Regional Park, native vegetation, including Great Basin sagebrush community species such as great basin sagebrush, antelope bitterbrush, and mountain snowberry, has been left in place adjacent to all facilities, as well as in the southwest and northeast corners of the park. This community also has the potential to provide suitable habitat for native species. Construction and operation of these parks and open space areas has the potential to impact riparian or other sensitive natural communities. Therefore, **Mitigation Measure BIO-6** is recommended to reduce potentially significant impacts to a less than significant level.

Ground disturbances also have the potential to result in the introduction, colonization, and/or expansion of non-native, invasive plant populations. In particular, cheatgrass (*Bromus tectorum*), which is a soil surface germinator, has become a serious problem for crop and range management throughout the West and Mid-west where disturbed soils have been left exposed. If allowed to establish itself in areas disturbed by the project, cheatgrass and other non-native plant species could degrade habitats, including sensitive natural communities, by out-competing native species. Therefore, **Mitigation Measure BIO-7** is recommended to avoid and minimize the threat of introducing or expanding cheatgrass and other invasive plant populations.

Mitigation Measures

BIO-6 **Sensitive Habitats:** Three vegetation types within the Project area (aspen forest and woodland, mixed willow riparian, and montane wet meadow) are considered sensitive. To the extent practicable new recreational facilities shall avoid these vegetation types. In the event this is not practicable impacts will be minimized by restricting the Project footprint, including temporary and permanent impacts, to the minimum required to implement the project. Mitigation for trees that are necessary to remove has also been incorporated in the Project's Aesthetics and Visual Resources assessment.

In the event the Town elects to implement projects under the PRMP that would involve structures within stream courses and other drainage features (that often support the sensitive vegetation types mentioned above), prior to project approval the Town shall notify and consult with the CDFG regarding the need for a Streambed Alteration Agreement (SAA). (Impacts attributed to the PRMP's trails components are evaluated in the current TSMP and SHARP EIR) All work shall be performed in compliance with the conditions set forth in the SAA, as determined by the CDFG. Such conditions may include the in-kind replacement or restoration of riparian habitat at a 1:1 ratio for temporary impacts and a 2:1 ratio for permanent impacts within the Project Area, or as otherwise directed by the CDFG. Alternatively, if the impacts are very minor, the CDFG may, at its discretion, allow the work to proceed under a letter of law without mitigation other than notification and consultation.

As part of the SAA agreement process and prior to beginning construction within CDFG regulated drainages, a Habitat Mitigation and Monitoring Plan (HMMP) should be developed in coordination with the CDFG and USFS if necessary that ensures no net loss of riparian habitat value or acreage. The HMMP shall include, but not necessarily be limited to, the following:

- The establishment of a reference site near regulated resources to be impacted that have similar hydrology, soil regimes, and exposure as the resources to be impacted.

- The establishment of baseline conditions at the reference site regarding absolute native shrub and tree cover, woody shrub and tree stalk density, percentage cover by non-native plant species, and plant species diversity the vegetation using the Sorensen method (Stiling, 1999) within a 400 square foot prescribed reference plot.

- The establishment of a restoration site to encompass the mitigation needs of one or more Project elements either on the Project element site or off site within the affected watershed.

- A minimum 3-year establishment, monitoring, and maintenance (trash collection, weeding, etc.) period.

- The establishment of the following success success criteria within a 400 square foot prescribed plot within the restoration site – 70 % of baseline absolute cover by native shrubs and trees; 70 % of baseline woody shrub and tree stalk density; no more than 5% cover by non-native plant species; and a Sorensen value of 0.6.

  The HMMP shall be subject to CDFG approval and may require additional measures in addition to the mitigation discussed above. Because the implementation of individual projects proposed under the PRMP is expected to occur over several years, the Town should also explore the processing of a Programmatic SAA with CDFG.

BIO-7 **Sensitive Habitats**: Prior to any ground disturbance related to project construction, project footprints and their immediate surroundings shall be inspected by a person qualified and experienced in the identification of cheatgrass and other non-native, invasive species. If invasive plant species are found within or adjacent to areas to be disturbed, and such areas are controlled by the Town or permission is granted by the property owner to undertake the measures, one or more of the following measures shall be implemented:

- Mature and seedling plants shall be removed through means appropriate for the site, including hand-pulling, mechanical clearing, and/or the application of herbicides. If mechanical clearing is to be used, a moldboard plow should be utilized and adjusted to turn over soil and bury soil surfaces at least two and one-half inches deep to prevent germination.

- Immediately following the removal of target species a pre-emergent herbicide shall be applied to all areas where target species were found. The application of herbicide should be made in late summer or the fall for the best results. Herbicides such as *Journey* and *Plateau* should be considered for use. In particular, Journey, when applied properly will not kill most perennial native plants, but will prevent cheatgrass from germinating.

- In all cases, the application of herbicide shall use best management practices to avoid erosion and herbicides in runoff from reaching rivers, streams, lakes, and other wetland areas.

- Any re-vegetation of disturbed soils shall take place as soon as feasible after the removal of target species and/or the application of herbicide. Soil surfaces should not be exposed for prolonged periods of time, particularly during the spring when invasives are setting seed.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact With Mitigation Incorporated. According to the Biological Assessment some parks and open space areas addressed by the PRMP could contain federally protected wetlands. These areas include Mammoth Creek Park East, Mammoth Creek Park West, the Town-owned open space along Mammoth Creek, and the Town-owned open space (Bell-Shaped Parcel). Parks and open space along Mammoth Creek contain riparian or wetland areas that are likely to fall under Army Corps of Engineers ("ACOE"), California Regional Water Quality Control Board ("RWQCB"), and California Department of Fish and Game ("CDFG") jurisdiction due to the presence of moist soils and obligate hydrophytic plant species on the banks of the Creek. These indicate that the banks likely contain wetlands under the jurisdiction of the ACOE. Riparian habitat associated with Mammoth Creek is likely under the jurisdiction of the CDFG. In the Town-owned Bell-Shaped Parcel, a drainage feature crosses the site from east to west near the northern boundary. The drainage has an earthen bottom and had a small amount of vegetation within the banks at the time of the site visit in 2009. A parcel map prepared in 2000 identifies this drainage and adjacent vegetation as wetland. A second wetland area occurs at the southern end of the parcel. These features are likely to be jurisdictional and regulated by ACOE, RWQCB, and CDFG.

Development within these potential wetland areas has the potential to adversely affect federally protected wetlands. Therefore, **Mitigation Measure BIO-8**, which would to reduce impacts to wetlands, is recommended. With the implementation of this mitigation measure, potentially significant impacts to federal wetlands would be reduced to a less than significant level.

Mitigation Measures

BIO-8 Federally Protected Wetlands: In the event the Town elects to construct, repair, maintain and/or improve parks and recreation facilities in association with individual projects proposed under the PRMP within waters of the U.S. and federally protected wetlands, prior to project approval the Town shall notify and consult with the ACOE regarding the need for a Section 404

Permit and the RWQCB regarding the need for its 401 certification. All work shall be performed in compliance with the conditions set forth in the Permit, as determined by the ACOE. Such conditions may include the in-kind replacement or restoration of waters and/or wetlands at a ratio of 1:1 for temporary impacts and a ratio of 2:1 for permanent impacts within the Project Area, or as otherwise directed by the ACOE. Alternatively, if the impacts are less than 0.1 acre, the ACOE may, at its discretion, allow the work to proceed without mitigation other than notification and consultation.

The mitigation shall use the same approach as is outlined above in Section 6.1.5 for the mitigation of impacts to CDFG regulated resources. As is usually the case, CDFG jurisdiction extends beyond that of ACOE and mitigation for impacts to CDFG regulated resources is inclusive of ACOE mitigation needs.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Because of the historic recreational use of the Project Area, substantial interference with the movement of wildlife is not expected to result from any of the Project components (impacts attributed to the PRMP's trails components are evaluated in the current TSMP and SHARP EIR). Wildlife movement that is occurring today through the area's parks does so in the presence of humans and their recreational activities, and is expected to continue uninterrupted. Intensification of overall human use of recreation lands will occur as future projects in the Town as a whole and in this area (such as the Snowcreek VIII project), are built out. However, these changes are not caused directly by the Project, and would occur with or without the implementation of the Project. Moreover, the implementation of proposed recreational facilities, such as parks and open space, are not considered to be an agent for habitat fragmentation and habitat isolation. Therefore, impacts to wildlife movement and migratory fish or wildlife species would be less than significant and no additional mitigation measures are required.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact With Mitigation Incorporated. It is expected that with implementation of the Project by the Town, or with USFS's approval authority for facilities on its lands, the Project will be consistent with local policy and ordinances as well as USFS land use and conservation plans. As is discussed below, adoption and implementation of the Project should incorporate certain mitigation and conservation measures which would be consistent with the Town's 2007 General Plan Resource Management and Conservation Element. These include policies specifically directed at sound stewardship of important wildlife and biological habitats, as well as special status plant and animal species; mitigation for potential impacts to sensitive habitats, including special status plant and animal species and mature trees; construction of active and passive recreation away from habitat areas; support of fishery management activities; and living safely with wildlife.

Nonetheless, conflicts between humans and their pets and wildlife are likely to currently occur within and adjacent to the Project Area. Given the natural setting of much of the Project Area, it is inevitable that potential conflicts with wildlife will occur so long as humans (and their pets) continue to visit and use the Project Area and its trail and park systems. Such conflicts potentially include, but are not limited to

harassment of wildlife by off-leash dogs, or by humans approaching wildlife, the feeding of wildlife, the discharge of weapons at or in proximity to wildlife, and human disturbance of breeding and foraging activities, all of which are detrimental normal wildlife behavior. By incorporating the proposed **Mitigation Measures BIO-1** through **BIO-8**, above, and **Mitigation Measure BIO-9**, below, the PRMP would be consistent with local policies and ordinances and any impacts would be reduced to less than significant levels.

Mitigation Measures

Refer to **Mitigation Measures BIO-1 to BIO-8**. The following mitigation measure is also prescribed.

BIO-9 **Local Policies or Ordinances:** In order to educate parks and recreation facility users about the potential for human/wildlife conflicts, the Town shall install warning signage in conjunction with development or improvement of parks and recreation areas. The signs shall explain the risks and potential dangers associated with the presence of wildlife at these facilities, and include instructions for what to do in case of a potential human/wildlife conflict. The signage should include, but not necessarily be limited to the following: refer to the Police Department/Wildlife Management Officer, USFS personnel and/or CDFG personnel as appropriate when dealing with bears; prohibitions on feeding wildlife; warnings against approaching wildlife; and user responsibilities for removing trash.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. At this time there are no adopted or on-going region-wide habitat conservation plans in the area that would be affected by implementation of the Project. Therefore, the PRMP would not impact adopted conservation plans no mitigation measures would be required.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

Less Than Significant Impact With Mitigation Incorporated. According to the analysis in the *Cultural Resources Assessment for the Parks and Recreation Master Plan, Trail System Master Plan, and the Sherwin Area Recreation Plan ("Cultural Resources Assessment"), Town of Mammoth Lakes, Mono County, California* (PCR, July 2011), several areas throughout the PRMP could contain historical resources. The *Cultural Resources Assessment* is on file and available for review at the Town of Mammoth Lakes.

The PRMP suggests that a new park facility could be located on Town-owned open space in the vicinity of Owen Street and Old Mammoth Road, which is close to the center of the historic Old Mammoth City Future park excavation and construction has the potential to cause both direct and indirect impacts to early-twentieth century residences in this area. Potential impacts maybe reduced through a project design that would reflect the early-twentieth century rustic character of the neighborhood and the avoidance of any identified historic resources. Additionally, Project improvements within Mammoth Creek Park East and

West for parking, signage and trail improvements are proposed in the vicinity of Hayden Cabin, listed on the California Register, and the Old Mammoth Town Site (CA-MNO-3H), previously identified as containing both prehistoric and historic subsurface remains as well as existing potential historic structures. If any improvements occur in proximity to Hayden Cabin, specifically if they involve new structures or notable changes in the setting and landscaping adjacent to the resource, there could be significant indirect impacts on Hayden Cabin as a historic resource, and may also have the potential to significantly impact both archaeological resources and historic structures associated with the Old Mammoth Town Site (CA-MNO-3H). Properties over 45 years in age within the project area and vicinity must be surveyed, evaluated, and recorded on DPR forms by a qualified architectural historian. Potential impacts to identified resources must be assessed and the project design must comply with the *Secretary of the Interior's Standards for Rehabilitation*. In the event eligible historic resources are demolished for construction of the park, mitigation would include completion of a Historic American Building Survey report per State and Federal guidelines. These recommendations are reflected in **Mitigation Measure CULT-1**, below. With the implementation of this mitigation measure, potentially significant impacts to historical resources would be reduced to a less than significant level. Impacts to historical resources identified in the trails components of the PRMP are addressed in the EIR prepared for the TSMP and SHARP.

Mitigation Measures

CULT-1 The Old Mammoth City neighborhood is a previously identified California Point of Historical Interest. The Hayden Cabin is listed on the California Register, and the Old Mammoth Town Site (CA-MNO-3H) is previously identified as containing both prehistoric and historic subsurface remains as well as existing potential historic structures and therefore, improvements on or adjacent to these historic resources that have the potential to directly impact these resources or their settings, must be designed to comply with the Secretary of the Interior's *Standards*. Prior to designing or implementing projects in these areas, the Town shall engage a qualified historic preservation consultant to review the proposed projects. A qualified architectural historian, historic architect, or historic preservation professional is someone who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61, and has at least 10 years experience in reviewing architectural plans for conformance to the Secretary's Standards and Guidelines. The Town shall undertake and complete construction in a manner consistent with the preservation consultant's recommendations to ensure that the Project meets the *Secretary of the Interior's Standards for Rehabilitation*. The preservation consultant shall review the final construction drawings for conformance to the Secretary of the Interior's Standards and prepare a memo commenting on the final Project. A Project that conforms to the Secretary of the Interior's *Standards* is considered fully mitigated under CEQA. For projects on federal lands, upon completion of any report on findings, the State Historic Preservation Officer shall be consulted to allow for Section 106 review and concurrence with the study findings. In the event eligible or designated historic resources or key contributing features are demolished for construction park facilities, mitigation shall include completion of a Historic American Building Survey report per State and Federal guidelines.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

Less Than Significant Impact With Mitigation Incorporated. According to the analysis in the *Cultural Resources Assessment*, the PRMP area could contain archaeological resources. The results of the cultural resources records search through the CHRIS-EIC revealed that multiple archaeological resources are located within the Project Area. These findings confirm that the potential to impact archaeological resources (on the surface or buried) at these Project components appears to be high if excavations are planned in native soil.

The proposed PRMP improvements may entail ground disturbing activities, including excavation for foundations, utilities, and possible sports fields or playgrounds. All construction activities that include excavations into native soils would require additional analyses to identify any potential archaeological impacts. Before an adequate project-level impact analysis can be performed for these resources (or any other previously recorded resources within the PRMP area), the current location (or resource boundaries), condition, and contents of the resources shall be field-verified by means of a pedestrian field survey before site- and project-specific mitigation measures can be established to reduce, minimize, or avoid any impacts to these resources. New surveys would also be required to identify if any previously unknown resources are located within the Project. Furthermore, given the many years that have passed since the resources were initially recorded and the lack of accurate GPS receivers (and inadequate mapping standards) at that time, it is possible that some resources may no longer exist or may not be located where they were originally mapped, which can only be confirmed through a current pedestrian field survey. These recommendations are reflected in **Mitigation Measures CULT-2** through **CULT-6**, below. With the implementation of these mitigation measures, potentially significant impacts to historical resources would be reduced to a less than significant level. Impacts to archaeological resources identified in the trails components of the PRMP are addressed in the EIR prepared for the TSMP and SHARP.

Project components that include excavations into heavily disturbed soils or fill would have no impact to archaeological resources because resources have likely been displaced from previous disturbances and the potential to encounter resources in fill soils would not be likely.

For subsequent projects that require excavation activity (e.g., grading, trenching or boring) into native soil, the following mitigation measures are recommended:

Mitigation Measures

CULT-2 The Town shall conduct a Phase I Cultural Resources Assessment of individual project areas to identify any archaeological resources within the area of a proposed project component. The Area of Potential Effect (APE[7]) will be the focus of the analyses for projects located on federal lands per Section 106. The Phase I assessment shall include cultural resources records searches through the Eastern Information Center (as needed) and the Inyo National Forest Field Office, a Sacred Lands File search through the Native American Heritage Commission and follow-up Native American consultation, and a pedestrian survey of the Project area *(Note: Surveys may not be required in areas that have already been surveyed unless resources were identified; such a determination should be made at the time of future project implementation and in consultation with Inyo National Forest as needed for projects on National Forest lands).* For projects on federal lands, upon completion of any report on findings, the State Historic Preservation Officer shall be consulted to allow for review and concurrence with the study findings.

[7] *The Inyo National Forest has determined that the APE for the Project includes the Project footprint and a 15-meter buffer area extending from the trail centerline or any other ground-disturbing activity associated with the proposed Project on federal lands.*

- If resources are identified during the Phase I assessment, then a Phase II assessment shall be required, as described in Mitigation Measure CULT-4;

- If no resources are identified as part of the assessment, no further analyses or mitigation shall be warranted, unless it can be determined that the project has a high potential to encounter buried archaeological or historical resources;

- If it determined that there is a moderate or high potential to encounter buried archaeological resources, appropriate mitigation shall be developed and implemented. Appropriate Mitigation may include, relocation of the facility to avoid the sensitive area, in which case no additional mitigation would be required. If avoidance is not possible, appropriate mitigation may include but not be limited to the following:

  Archaeological Monitoring During Construction: A qualified archaeologist shall be retained by the Town and approved by the reviewing agencies prior to the commencement of the Project. The archaeologist shall monitor all ground-disturbing activities and excavations within the Project area. If archaeological resources are encountered during implementation of the Project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment that may include the development and implementation of a testing/data recovery investigation or preservation in place. The archaeologist shall prepare a final report about the find to be filed with the Town and the CHRIS-EIC, as required by the California Office of Historic Preservation. The report shall include documentation and interpretation of resources recovered. Interpretation will include full evaluation of the eligibility with respect to the California and National Registers. The Town, in consultation with the archaeologist, shall designate repositories to curate any material in the event that resources are recovered on Town property. If the resources are encountered on private land, the landowner shall determine appropriate curation in consultation with the archaeologist and Lead Agency. If archaeological resources are encountered on National Forest lands, ground-disturbing activities shall cease in the immediate vicinity of the find and the Inyo National Forest shall be contacted immediately. The Inyo National Forest shall provide direction as to the appropriate evaluation, treatment, and curation of the find.

CULT-3 If resources are identified during the Phase I assessment, a Phase II Cultural Resources Assessment may be warranted if improvements or new public access is proposed in the vicinity of such resources or if an alternate location is not selected. The Phase II assessment shall evaluate the resource(s) for listing in the California Register of Historical Resources (per CEQA) and the National Register of Historic Places (per Section 106). If enough data is obtained from the Phase I assessment to conduct a proper evaluation, a Phase II assessment may not be necessary. Methodologies for evaluating a resource can include, but are not limited to: subsurface archaeological excavations, additional background research, and coordination with interested individuals in the community.

CULT-4 If, as a result of the Phase II assessment, resources are determined eligible for listing, potential impacts to the resources shall be analyzed and if impacts are significant and cannot be avoided, mitigation measures shall be developed and implemented to reduce impacts to the resources. If avoidance is not feasible, then Phase III Cultural Resources Assessments shall be implemented. Phase III assessments can include, but are not limited to: additional subsurface archaeological excavations (i.e., data recovery) and/or archaeological monitoring during ground-disturbing activities. For projects on National Forest lands, coordination and concurrence with the Inyo National Forest and State Historic Preservation Officer regarding treatment or mitigation shall be required. The performance standard for this mitigation measure is to reduce potential impacts to archaeological resources to a less than significant level.

CULT-5 If archaeological resources are encountered during implementation of the Project, ground-disturbing activities should temporarily be redirected from the vicinity of the find. The Town shall immediately notify a qualified archaeologist of the find. The archaeologist should coordinate with the Town as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. Treatment may include the implementation of an archaeological testing or salvage program. All archaeological resources recovered will be documented on California Department of Parks and Recreation Site Forms to be filed with the CHRIS-EIC. The archaeologist shall prepare a final report about the find to be filed with the Town and the CHRIS-EIC, as required by the California Office of Historic Preservation. The report shall include documentation and interpretation of resources recovered. Interpretation will include full evaluation of the eligibility with respect to the California and National Registers. The Town, in consultation with the archaeologist, shall designate repositories to curate any material in the event that resources are recovered on Town property. If the resources are encountered on private land, the landowner shall determine appropriate curation in consultation with the archaeologist and Lead Agency. The archaeologist shall also determine the need for archaeological monitoring for any ground-disturbing activities in the area of the find thereafter. If archaeological resources are encountered on National Forest lands, ground-disturbing activities shall cease in the immediate vicinity of the find and the Inyo National Forest shall be contacted immediately. In such cases the Inyo National Forest shall provide direction as to the appropriate evaluation, treatment, and curation of the find.

CULT-6 If human remains are encountered unexpectedly during construction excavation and grading activities, pursuant to California Health and Safety Code Section 7050.5, the Applicant shall halt ground-disturbing activities within the area of the human remains and notify the County Coroner. If the remains are determined to be of Native American descent, the coroner shall have 24 hours to notify the California Native American Heritage Commission (NAHC). The NAHC shall identify the person(s) thought to be the Most Likely Descendant of the deceased Native American, who shall have 48 hours from notification by the NAHC to inspect the site of the discovery of Native American remains and to recommend to the Applicant or landowner means for treating and disposition, with appropriate dignity, the human remains and any associated grave goods. The Applicant or landowner shall reinter the remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance. If the remains are determined to be of Native American descent and are located on National Forest lands, the coroner has 24 hours to notify the NAHC and the Inyo National Forest of the discovery. The Inyo National Forest shall take the appropriate steps to comply with the federal Native American Graves Protection and Repatriation Act (NAGPRA). NAGPRA stipulates that Native American remains and associated funerary objects belong to lineal descendants. If the descendants cannot be identified, then those remains and objects, along with unassociated funerary or sacred object and objects of cultural patrimony belong to the

tribe on whose lands the remains were found or the tribe having the closest relationship to them.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. Results of a paleontological records search through the UCMP online database indicated that there are no recorded fossil localities within the PRMP area. The nearest known vertebrate fossil site is located more than 30 miles north of the Project Area. Initial consultation of collection records and geologic maps (Jennings 1977) indicate that the Mammoth Lakes area has no history of fossil resources largely because the terrain is dominated by igneous and metamorphic rocks which are not conducive to retaining paleontological resources. Pleistocene glacial deposits overlie the basement and volcanic rocks in the Project and throughout the Town. Results of previous geotechnical studies for projects within the Town indicate that the lower portions of the Town and the UGB are underlain by undocumented fill (in developed areas), quaternary younger alluvium, and quaternary Tioga Till (i.e., glacial till) (Sierra Geotechnical Services, Inc. 2005). Apart from glacial deposits, there are no sediments old enough to produce fossils inside or within the vicinity of the Project Area and it is unlikely that shallow excavations associated with the PRMP would encounter these deposits. However, there is a low to moderate potential to encounter paleontological resources in glacial deposits within the proposed Project Area. Therefore, **Mitigation Measure CULT-7**, which would apply to all construction activities, is recommended. With the implementation of this mitigation measure, potentially significant impacts to paleontological resources would be reduced to a less than significant level.

Mitigation Measures

CULT-7 If paleontological resources are encountered during implementation of the Project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Town shall immediately notify a qualified paleontologist of the find. The paleontologist shall coordinate with the Town as to the immediate treatment of the find until a proper site visit and evaluation is made by the paleontologist. Treatment may include the implementation of salvage excavations or preservation in place. The paleontologist shall prepare a final report on the find that shall include appropriate description of the fossils, treatment, and curation. A copy of the report shall be filed with the Town and an appropriate paleontological institution, and shall accompany any curated fossils. The paleontologist shall also determine the need for paleontological monitoring for any ground-disturbing activities in the area of the find thereafter. If paleontological resources are encountered on National Forest lands, ground-disturbing activities shall cease in the immediate vicinity of the find and the Inyo National Forest shall be contacted immediately. In such cases the Inyo National Forest shall provide direction as to the appropriate evaluation, treatment, and curation of the find.

d. Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact With Mitigation Incorporated. According to record searches conducted through the CHRIS-EIC, no existing or former cemeteries (including Native American human remains) have been recorded within the PRMP area. Also, the SLF search through the NAHC did not indicate any known Native American cultural resources within the SHARP Priority Projects sites or within a half-mile radius of these sites. The NAHC results noted, however, that the "absence of archaeological items is not evidence that it does not exist at the subsurface level." No existing or known burial sites or cemeteries are known to occur

in the locations of potential PRMP projects and, as such, impacts on human remains are not expected. However, if such resources are accidentally encountered during Project implementation, **CULT-6**, above, would reduce potentially significant impacts to human remains to a less than significant level. No further mitigation measures would be required.

Mitigation Measures

Refer to **Mitigation Measure CULT-6**. No additional mitigation measures are necessary.

VI. GEOLOGY AND SOILS

Would the project:

a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Damage due to surface rupturing is limited to the fault line break, unlike damage from ground shaking, which can occur at great distances from the fault. Generally, damage to structures is limited to buildings located on a surface fault rupture, or within approximately 50 feet of an active or potentially active fault line. The State of California has not identified any Alquist-Priolo Earthquake Fault Zones within the Project Area; however, the Town of Mammoth Lakes, "Special Development Areas" map indicates an earthquake fault zone within the Bluffs area in Old Mammoth. In the event of fault rupture it is likely there would be minimal risk of loss, injury or death to outdoor recreational uses or persons using outdoor recreational facilities, such as parks or trails. It is not expected that future structures, such as recreational centers, gymnasiums, or swimming pools would be located in the Bluffs area under the PRMP. Because occupied structures would not be developed in the Bluffs area, the PRMP has low likelihood on exposing people or structures to substantial adverse effects as a result of fault rupture. Therefore, impacts with respect to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Mono Lake Long Valley region is part of one of the most active seismic regions in the U.S. In addition, the Project Area contains areas of varied topography that could be susceptible to landslide hazards. The Town of Mammoth Lakes is located near the southwest edge of the Long Valley Caldera, which overprints the Sierra Nevada boundary fault system. Persistent earthquake and volcanic activity over the past four million years have formed the eastern Sierra landscape in the vicinity of Long Valley Caldera and the Mono Basin. Mammoth Mountain is a smaller dome on the rim of the caldera formed by repeated eruptions from vents on the southwest rim of the caldera 220,000 to 50,000 years ago. The caldera and other geologic features such as Devil's Postpile, Mammoth Rock, and Crystal Crag are evidence that the region around the Town is geologically young with an active recent history.

Much attention has been focused on the Long Valley caldera resurgent dome and on associated volcanic hazards at Mammoth Mountain; however, little is known about the details of the most recent (latest

Pleistocene to Holocene) eruptions in the greater Long Valley caldera complex, specifically in the Mono and Inyo Craters chain. In general, activity within the resurgent dome has not been linked with the formation and later eruptions of the Mono and Inyo Craters; however, there may be evidence to connect the two.

During the past 3,000 years the Mono-Inyo Craters have erupted at intervals of 700 to 250 years, the most recent eruptions being from Panum Crater and the Inyo Craters 500 to 600 years ago, and Paoha Island about 250 years ago. Evidence from both seismic soundings of the crust and studies of the fabric and composition of the lava indicate that these eruptions probably originated from small, discrete magma bodies rather than from a single, large magma chamber of the sort that produced the caldera-forming eruption 760,000 years ago.

In 1982, the United States Geological Survey (USGS) under the Volcano Hazards Program began an intensive effort to monitor and study geologic unrest in the Long Valley caldera. The goal of this effort was to provide residents and civil authorities in the area reliable information on the nature of the potential hazards posed by this unrest and timely warning of an impending volcanic eruption, should it develop. Most, perhaps all, volcanic eruptions are preceded and accompanied by geophysical and geochemical changes in the volcanic system. Common precursory indicators of volcanic activity include increased seismicity, ground deformation, and variations in the nature and rate of gas emissions.

Seismic hazards are greatest in the proximity of buildings, such as a potential recreation center, band shell/amphitheater, ice hockey rink, or indoor swimming pool that could be constructed under the PRMP. Seismic hazards associated with outdoor picnic areas, playing fields and other open-air venues are not hazardous during ground shaking events. Goal S.3.H of the Town of Mammoth Lakes General Plan is to minimize loss of life, injury, property damage, and natural resource destruction from all public safety hazards, including geologic and seismic hazard, as follows.

- Policy S.3.H Restrict development in areas with steep slopes.
- Policy S.3.I: Require geotechnical evaluations and implement mitigation measures prior to development in areas of potential geologic and seismic hazards.

The State of California's minimum standards for structural design and construction are set forth in the California Building Standards Code (CBSC) (CCRs, Title 24). The CBSC is based on the Uniform Building Code (UBC), which is used widely throughout United States (generally adopted on a state-by state or district-by-district basis), and has been modified for California conditions with numerous, more detailed and/or more stringent regulations in seismically active areas.

Ground shaking is often a factor of soil type and depth. The CBSC requires that "classification of the soil at each building site... be determined when required by the building official" and that "the classification... be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBSC states that "the soil classification and design-bearing capacity shall be shown on the (building) plans, unless the foundation conforms to specified requirements." The CBSC provides standards for various aspects of construction, including but not limited to excavation, grading, and earthwork construction; fill placement and embankment construction; construction on expansive soils; foundation investigations and liquefaction potential; and soil strength loss. In accordance with California law, project design and construction would be required to comply with provisions of the CBSC.

Building specifications under Chapter 15 of the Town Municipal Code requires that all structures within the boundaries of the Town shall be designed to the requirements of Seismic Zone 4 as defined in the Uniform Building Code. Municipal Code Section 12.08.080 requires engineered plans and a soils/geotechnical report for all grading permit applications. The geotechnical report evaluates potential instabilities and provides site-specific recommendations to reduce structural failure during ground shaking. Development plans are reviewed by the Town to determine conformance with specific recommended geotechnical procedures. Field inspection is conducted by the Town during earthwork and construction operations. The observation of cuts, fills, backfills, foundation excavations, and the preparation of pavement sub-grades would take place during respective phases of site development. Compliance of PRMP projects with the requirements of the CBSC and Municipal Code Section 12.08.080 would reduce impacts associated with seismic ground shaking to a less than significant level.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a response to severe ground shaking that can occur in loose soils. Liquefaction occurs in areas with shallow groundwater and where finer grained sands make up a significant part of the near surface (less than 30 feet amsl) soil section. Within Mammoth Lakes, areas of alluvium and moraine material with shallow groundwater have the potential for liquefaction. Recreational facilities developed under the PRMP would be constructed in accordance with the applicable seismic requirements of the CBSC and Municipal Code requirements, as described above. Liquefaction potential and remediation techniques (including avoidance, if applicable) would be identified through a soils report required under Municipal Code Section 12.08.080. With the implementation of CBSC and Municipal Code requirements, impacts with respect to liquefaction would be less than significant.

iv. Landslides?

Less Than Significant Impact With Mitigation Incorporated. Landslides consist of earth and debris movement under the force of gravity and are affected by the type of earth materials involved, the internal friction of the slide mass, and the slope over which the mass is moving. Topographic expression ranges from level to rolling alluvial plains at about 7,200 feet amsl in Long Valley, to approximately 11,600 feet amsl at Mammoth Mountain Summit, west of Mammoth Lakes. Slope gradients in the Town range from relatively flat terrain in Sherwin Meadow and Long Valley to slopes of 50 percent or greater on Mammoth Mountain. Slopes exceeding 30 percent are found in portions of Old Mammoth (particularly the Bluffs area), Mammoth Slopes, Westridge and the Mammoth Knolls. Colluvial deposits located on the slopes of Mammoth Mountain and Mammoth Rock are generally loose unconsolidated material and have moderate to high erosion and landslide potential.

Triggering events for landslides include earthquakes, heavy precipitation, natural erosion, and earthwork/grading. The moraines[8] south, west, and north of the Town are considered unstable, partly because they contain irregular deposits of clay that lack the strength to stand in steep slopes. Moraines in the center of the Town and to the east are considered generally stable, unless they are underlain by shallow groundwater because of the relatively low topography in this area. The southwest portion of the Lodestar project area has the potential for shallow groundwater; however, no groundwater was encountered during

[8] *Moraines are the rocks and soil carried and deposited by a glacier. An "end moraine", either a ridge or low hill running perpendicular to the direction of ice movement, forms at the end of a glacier when the ice is melting.*

test pits dug in this area in 1976. Slope stability problems are primarily limited to steeper slopes, particularly those with significant talus accumulations. The stability of moraines in the PRMP area is variable.

Generally, PRMP projects within the UGB would be located in relatively level to gently sloping topography. However, where the locations of some future sites are unknown the potential exists for some future projects to be located in areas of steeper terrain, or in a higher elevation than an adjoining property. Any construction that has the potential to expose soils to precipitation in a hilly site or adjacent to moraine deposits could increase landslide risk. However, it isn't expected that construction activities for any of the potential projects would involve substantial quantities of earthwork. Municipal Code Section 12.08.080 would require a geotechnical (soils) report that would address landslide potential to some extent. However, to ensure the implementation of certain slope criteria, the following mitigation measures are recommended. With implementation of **Mitigation Measures GEO-1** through **GEO-3**, potentially significant impacts with respect to landslides are expected to be reduced to a less than significant level.

Mitigation Measures

GEO-1 Development on slopes greater than 20 percent shall be avoided where feasible alternative locations exist.

GEO-2 Prior to any development on slopes 20 percent or greater, a soils and geotechnical study shall be conducted to determine the potential for landslide and soil instability and to ensure that design measures are incorporated to avoid landslide and soils instability hazards.

GEO-3 Development on slopes greater than 20 percent shall be regularly monitored and evaluated by the Town to ensure that unstable soil conditions do not develop. Should unstable soil conditions exist, the project shall be temporarily closed until conditions are improved.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Town is underlain by a variety of rock types, including Pliocene to recent volcanic and pyroclastic deposits (12 million years old to less than 10,000 years old), Pleistocene glacial deposits (2.5 million to 10,000 years old), and Holocene alluvium (less than 10,000 years old). Soils are derived from these geologically recent deposits. Soils in the Planning Area are characterized as Frigid and Cryic based on a four square mile survey, including the Town, by the USDA, Natural Resource Conservation Service in 2002. The soils are typically gravelly loams with low water capacity generally developed on glacial outwash south of Mary Lake Road and on glacial moraines to the north. Generally, soils are sensitive to disturbances by development and have a moderate to high erosion potential, depending on the steepness of the slopes.

Soils throughout the region are sensitive to disturbance and exhibit moderate to high erosion potential depending on the grade of the slope. Construction of project components could expose soils to wind and rain action. If slopes and exposed surfaces are not protected by vegetation or some other form of protection, un-cemented soils could experience erosion during strong winds or heavy precipitation. In turn, erosion would generate potential impacts to nearby streams and watercourses or the storm drain system due to sedimentation.

Development of future PRMP system components would comply with the applicable provisions of Municipal Code Section 12.08, *Land Clearing, Earthwork and Drainage Facilities*, which includes Sections 12.08.090, *Drainage and Erosion Design Standards*, and 12.08.080, *Engineered Grading Permit Requirements*. In addition, projects would be required to comply with the Lahontan Regional Water Quality Control Board (LRWQCB) *Guidelines for Erosion Control in the Mammoth Area*. These regulatory requirements serve to implement construction techniques that minimize soil erosion and slope instability. In addition, best management practices (BMPs), which would reduce and/or eliminate erosion potential, would be incorporated into construction projects, as applicable. Future construction sites would be subject to compliance with the requirements (as applicable) set forth in the National Pollutant Discharge Elimination System (NPDES) Storm Water General Construction Permit for construction activities (as applicable) and water quality regulations set by the LRWQCB. Compliance with applicable requirements would ensure that short-term construction impacts associated with soil erosion would be less than significant.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. Impacts associated with liquefaction and landslides are discussed in Response No. VI (a (ii and iii)), above. As discussed therein, risk of liquefaction and landslide would be reduced to less than significant levels with the enforcement of CBSC standards and Municipal Code Section 12.08.080, which requires geotechnical study prior to development. Landslide risks would also be reduced through the implementation of **Mitigation Measures GEO-1 through GEO-3**.

Lateral spreading involves displacement of large blocks of ground down gentle slopes or toward stream channels. Lateral spreading is typically a type of displacement of major concern associated with liquefaction. The Town does not have any know history of significant lateral spreading occurrences. Thus, the potential for lateral spreading is considered to be low and as such, impacts are considered to be less than significant.

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. The PRMP area does not include areas of known subsidence associated with oil or ground water withdrawal, peat oxidation or hydro-compaction. Furthermore, the PRMP does not include the extraction of oil or groundwater from aquifers. As such, no impacts regarding subsidence would occur with Project implementation. Based on the above, impacts associated with unstable geology and soils would be less than significant.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. No expansive soils have been mapped or encountered in the Town. CBSC and Municipal Code regulations requires that "classification of the soil at each building site... be determined when required by the building official" and that "the classification... be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBSC states that "the soil classification and design-bearing capacity shall be shown on the (building) plans, unless the foundation conforms to specified requirements." In addition,

Municipal Code Section 12.08.080 requires a soils analysis of all moderately sized grading projects. With the implementation of existing CBSC and Municipal Code regulations, and the low probability of expansive soils in the region, impact with respect to expansive soils would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less Than Significant Impact. Implementation of the Project could involve new restroom facilities at various locations. Some of the restroom facilities may have access to water and/or sewer infrastructure to accommodate wastewater disposal needs. However, there may be instances where due to the remote location of a proposed restroom facility, it may not be feasible to connect with existing infrastructure for wastewater disposal. In these circumstances, septic and/or or other wastewater disposal systems may be considered by the Town. Development of such systems may not be supported by certain soils types and could directly or indirectly result in water quality impacts. However, any proposed septic or alternative waste disposal system would be required to comply with the standards and regulatory requirements stipulated by the current regulatory standards, including those set by Mono County, Town of Mammoth Lakes and LRWQCB, at the time of the design and installation of proposed restroom facility. Existing water quality regulations would require a site specific review of the proposed restroom facility to determine whether soils would be capable of adequately supporting the proposed wastewater system. Compliance with the applicable regulations would ensure that impacts with respect to septic sewers would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

Less Than Significant Impact. In response to growing scientific and political concern regarding global climate change, California adopted a series of laws to reduce both the level of GHGs in the atmosphere and to reduce emissions of Greenhouse Gases (GHGs) from commercial and private activities within the State. Under existing regulations, the California Office of Planning and Research (OPR) must prepare, develop, and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by the California Environmental Quality Act (CEQA). However, OPR does not identify a threshold of significance for GHG emissions, nor has it prescribed assessment methodologies or specific mitigation measures. The California Air Resources Board (CARB) proposes GHG emission reduction targets specific to each metropolitan planning organization (MPO). The CARB recognizes that GHG reduction measures may be unique to certain areas of California where viable GHG reduction measures in one area may not be feasible in another.

As of January 2, 2011, the EPA requires GHG analyses to be performed as part of the permitting requirements for projects which are currently undergoing the permitting process. In addition, federal policy since 2009 is "aimed at both increasing fuel economy and reducing GHG pollution for all new cars and trucks sold in the United States" and fuel efficiency standards that would apply to model years 2012 through 2016. These standards would result in a reduction of approximately 900 million metric tons of GHG nationwide.[9] The California Green Building Standards Code (CALGreen) (2011) establishes mandatory measures for new

[9] *http://www.whitehouse.gov/the_press_office/President-Obama-Announces-National-Fuel-Efficiency-Policy/*

residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality[10]. Given that the Project would directly or indirectly cause GHG emissions during construction and operation, many of the global climate change regulations and plans noted above are applicable to the Project.

Construction of PRMP components are expected to occur over a multi-year period (through 2025) and would generally occur during the summer months. **Mitigation Measure AQ-1** (see Response No. III (a) (A*ir Quality*) in this Initial Study) would limit the daily construction equipment mix across all simultaneous PRMP construction projects to approximately 16-20 pieces of heavy duty equipment. Thus, annual worst-case programmatic GHGs using the maximum daily allowable fleet mix for each work day for six months (approximately 25 workdays per month) would result in approximately 830 metric tons of CO_2. Results of the analysis are presented in **Table B-1**, *Construction Greenhouse Gas Emissions*, below. Construction of individual projects would proceed as funding and Town approval are secured over a period of several years, and construction equipment mix would vary by project. Because this maximum level of intensity is unlikely to be sustained for six months; GHG emissions are likely overestimated. However, the estimated volume does not exceed the 900-ton threshold for CO_2e and would be less than significant.

Table B-1

Construction Greenhouse Gas Emissions

Emission Source	CO_2e (Metric Tons)
Cumulative	
Construction (Total)	830
Above the 900 ton threshold?	**No**

Source: PCR Services Corporation, 2011.

As shown above, maximum construction levels are not expected to result in annual GHG emissions that exceed the most stringent threshold proposed by CAPCOA.

Operation impacts would be based on vehicle miles traveled (VMT), which is a source of mobile emissions. As described under Response No. XVI (c), below, the increase in VMT would be roughly offset by the reduction in VMT by the closer proximity of recreational facilities to many community users and the increase in non-auto mode travel throughout Town (trails component of the PRMP). Overall, the Project is not expected to result in a significant increase in VMT. Provision of the additional pedestrian, bicycle, and transit facilities included in the Project Area would result in a general increase in non-auto travel. This would offset the increase in vehicle trips to some degree. The change in emissions from trail maintenance and improvement activities, compared to current practice, is expected to be negligible.

[10] *California 2010 Green Building Standards code, California Code of Regulations Title 24, Part 11.*

The operation of additional amenities of the Project, the recreation center gym/ indoor hockey rink and indoor swimming pool would increase the consumption of natural resources and generate additional GHG. However, the increase is expected to be minimal and difficult to quantify. Thus, the Project would not result in new long-term stationary sources, nor would it result in a significant number of net new vehicle trips. Therefore, because the change in operational GHG emissions is expected to be minimal, operational impacts would be less than significant.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Town of Mammoth Lakes has not yet developed a specific GHG Reduction Plan that meets the requirements set forth in the latest OPR guidelines. The Town has adopted goals and policies under the Mammoth Lakes General Plan to promote land use patterns that reduce the number and length of motor vehicle trips; implement best management practices to reduce emissions associated with construction; encourage linkage of new development areas and associated community-wide facilities; orientation of new facilities to existing developed areas of the community through open space systems and bicycle and pedestrian systems; and establish a comprehensive and safe system of bicycle routes and pedestrian trails for short-range commuting, shopping trips and recreational use.

The Mobility element of the General Plan sets forth several community goals that would potentially result in reduced (VMT) and respective reductions in GHG. These include the following goals:

> Goal M.2. Improve regional transportation system.
>
> Goal M.3. Emphasize feet first, public transportation second, and car last in planning the community transportation system while still meeting Level of Service standards.
>
> Goal M.4. Encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive.
>
> Goal M.5. Provide a year-round local public transit system that is convenient and efficient.
>
> Goal M.6. Encourage alternative transportation and improve pedestrian mobility by developing a comprehensive parking management strategy.
>
> Goal M.7. Maintain and improve safe and efficient movement of people, traffic, and goods in a manner consistent with the "feet first" initiative.
>
> Goal M.8. Enhance small town community character through the design of the transportation system.

The PRMP would be consistent with the Town's Mobility Plan and would further reduce GHGs as a result of the Project's sustainable commitment to VMT reduction and other vehicle-related emissions, based on the number of vehicle trips shifted to bicycling, walking, and transit under the PRMP's trails component.

Because the PRMP would not exceed the most stringent proposed threshold for temporary increases in GHG emissions during construction of potential parks and recreational components, it would support the State's goals to reduce GHG emissions. In addition, the PRMP would be consistent with the Town's goals and would

not conflict with any applicable plan, policy, or regulation to reduce GHG emissions. Therefore, Project implementation would result in less than significant impacts with respect to GHG emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials may be used during the construction phase of various park and recreational facilities. These may include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners and possibly herbicides and pesticides. Generally these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to anticipated compliance with applicable standards and regulations.

Over the long-term, the future parks and recreational facilities are non-industrial uses that would not serve to store, use, dispose of, or generate hazardous materials or wastes. However, routine maintenance activities associated with park and recreational facilities may involve the occasional use of hazardous materials. Potentially toxic or hazardous compounds associated with maintenance activities typically consist of readily available solvents, cleaning compounds, paint, herbicides, and pesticides. These compounds are regulated by stringent federal and state laws mandating the proper transport, use, and storage of hazardous materials in accordance with product labeling. The use and storage of these substances is not considered a health risk when used in accordance with manufacturer specifications and in compliance to applicable regulations. The potential exists for land uses in proximity to future parks and recreational facilities (such as cleaners or gas stations) regularly handle or store hazardous materials in substantial quantity. Such businesses are required under state and federal law to prepare Risk Management Plans and are subject to state and federal monitoring and reporting requirements. Therefore, such adjacent businesses are not expected to cause a significant hazard to the PRMP's recreational uses.

Overall, construction and operation of the Project would result in a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As discussed in Response No. VIII (a), above, the Project does not include facilities or land uses typically associated with hazardous materials handling, storage, or use. In addition, existing federal, State and local regulations exist to ensure that the use, storage, and disposal of hazardous materials associated with any proposed construction or maintenance activities would not result in significant hazard to the public or the environment through reasonably foreseeable upset and accident

conditions. Because of the limited use of hazardous materials associated with the development of future parks and recreational facilities, and anticipated compliance with associated federal, State, and Town regulations and requirements, impacts related to the accidental release of hazardous materials would be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Project implementation would involve improvements to existing and/or expansion of parks and recreational uses within proximity of existing and potentially future school sites. However, as discussed above, implementation would not involve the development of facilities or land uses typically associated with the handling, storage, or use of hazardous materials. It is also assumed that the limited use of hazardous materials that would occur would be carried out in conformance with manufacture guidelines and applicable federal, State and local regulations, which exist to ensure that hazardous materials use, storage, and disposal would not result in a significant hazard to the public or the environment. Because the future parks and recreational uses would not emit or handle hazardous materials, substances, or wastes, the Project would not expose the public or existing or future school sites to such materials. Therefore, impacts related to the exposure of school sites to hazardous materials or emissions would be less than significant.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. No sites within the PRMP area have been included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 (Cortese list).[11] Accordingly, Project implementation would not be subject to existing hazards from such a site. No impact would occur in this regard.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Less Than Significant Impact With Mitigation Incorporated. With the exception of a possible increase in use of the playing fields at Whitmore Regional Park, or the temporary enclosure of the Whitmore Park swimming pool under the PRMP, potential parks and recreational uses under the PRMP would not be located within two miles of a public airport or private airstrip. Whitmore Regional Park, which is located approximately 0.5 mile from the eastern end of the Mammoth Yosemite Airport, is within the ALUP area for the airport. The ALUP is a comprehensive land use plan that defines the type and pattern of future development at the Mammoth Yosemite Airport and in the surrounding areas. It includes specific policies and guidelines intended to protect the safety and general welfare of people in the vicinity of the airport and to ensure the safety of air navigation.

The Mono County General Plan and the ALUP prohibit certain flashing or bright lights directed toward an aircraft engaged in take-off or landing; any use that would cause sunlight to be reflected toward an aircraft;

[11] *California Environmental Protection Agency official website. Cortese List: Section 65962.5(a). http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm Accessed May 20, 2011.*

any use that would generate large amounts of smoke or steam; any use that would generate electrical interference, and uses that would attract large concentrations of birds. Structures within the ALUP planning boundary may not exceed 35 feet and land uses may not result in concentrations of people exceeding 25 persons per acre (e.g. shopping centers, restaurants, schools, hospitals, stadiums/arenas, and office complexes). According to the Initial Study for the Whitmore Park Track and Sports Field, no more than 236 athletes or other users would be on-site at the same time the Project's seating areas are filled to capacity (this number of people would be consistent with the ALUP's density criterion).

The PRMP anticipates the possible construction of a swimming pool enclosure at Whitmore Regional Park and the possible use of Whitmore Regional Park playing fields on a more frequent basis. The use of Whitmore Park is not expected to increase occupancy beyond the estimate provided in the Whitmore Park Track and Sports Field IS/MND. However, to ensure that any new structures or changes in the use of Whitmore Park under the PRMP would not result in a hazard with respect to Mammoth-Yosemite Airport, **Mitigation Measure HAZ-1** is recommended. With the implementation of the proposed mitigation measure, airport hazard impacts would be less than significant. This mitigation measure is similar to the safety-related mitigation measure provided in the Whitmore Park Track and Sports Field IS/MND.

Mitigation Measures

HAZ-1 Any PRMP components to be constructed under joint agreement with Mono County at Whitmore Regional Park shall be approved by Mono County to ensure that all Airport Land Use Plan regulations are met. This may also include consideration and approval by the Airport Land Use Commission.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?

Less Than Significant Impact. The Yosemite-Mammoth Airport (addressed under Response No. VIII (e), above) is the nearest location accommodating heliports or private airstrip to the PRMP's potential parks and recreational uses. Because the PRMP's possible parks and recreational uses, with the exception of Whitmore Regional Park, are not located within the vicinity of a private airstrip, safety hazards with respect to private air fields would be less than significant. Impacts to Whitmore Regional Parks would be the same as discussed under Response No. VIII (e) and would be reduced to a less than significant level with the incorporation of mitigation measures described above.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Proposed parks and recreational facilities would be subject to compliance with emergency access standards and requirements specified by the State Fire Code and the Town's Municipal Code, as well as the Town's General Plan, where appropriate. In addition, the Town has an adopted Emergency Operations Plan (EOP) (2001) for emergency response within the Town. Key points of the plan include the identification of critical areas in the town that represent hazards, areas for meeting and staging in an emergency event, communications, and emergency evacuation. Parks and other large areas are identified as emergency shelter and meeting locations. New facilities, such as a potential recreation center/ gym would support, not hinder the Town's emergency operations. In addition, the PRMP would not impair

implementation or physically interfere with the EOP, because no circulation changes are being proposed which conflict with the procedures set forth in the plan. Based on the above, emergency response or access impacts are considered less than significant.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact With Mitigation Incorporated. Mammoth Lakes is located in an area that has a significant amount of forested land and has been rated as having a very high fire potential. The Town's location relative to National Forest lands and the large areas of urban interface with forest vegetation increase the susceptibility of the Town to wildland fire. The combination of highly flammable fuel, long dry summers, and steep slopes create the potential for wildland fires in the Project Area. Wildland fires in the National Forest can be attributed almost exclusively to either lightning strikes or human activity. Wildfires can result in death, injury, economic loss, and heavy public investment in firefighting efforts. Woodlands and other natural vegetation can be destroyed, resulting in loss of timber, wildlife habitat, scenic quality, and recreational resources. Soil erosion, sedimentation of fisheries and reservoirs, and downstream flooding can also result from wildland fires.

The California Public Resources Code Section (CPRC) 4290 requires minimum statewide fire safety standards pertaining to the following:

- Road standards for fire equipment access;
- Standards for signs identifying streets, roads, and buildings;
- Minimum private water supply reserves for emergency fire use; and
- Fuel breaks and greenbelts.

USFS crews began constructing the Mammoth Lakes Fuel Break on August 1, 2002. This project is designed to protect the north end of Mammoth Lakes from fire and treat approximately 400 acres of urban interface (the 0.25 mile Defense Zone defined in the NFP). The fuel breaks are monitored annually by the USFS and depending on regrowth of brush, may be re-mowed every five years.

In response to the 2002 fire season, the Eastern Sierra Regional Fire Safe Council (ESRFSC), which is based in Bishop, prepared a handbook called the Fire Safe Plan. This handbook is designed to help east side residents of Inyo and Mono Counties improve their defense against wildland fires. The ESRFSC is comprised of private citizens advised by the USFS, CDF, and BLM. The ESRFSC collaborates with local volunteer fire departments and assists CDF as they train fire prevention volunteers to perform residential fire hazard inspections within Eastern Sierra communities. Volunteers work with homeowners to raise awareness concerning wildland fire risks and methods of home hazard reduction.

The implementation of the PRMP is expected to increase the number of users and frequency of use of recreational facilities within the Project Area. However, an increase recreational facility usage does not necessarily indicate an increase in wildland fire hazards. Nonetheless, it is possible that increased activity may incrementally increase the potential for wildland fires due to cigarette smoking, picnicking, and

campfires. While this increase in risk may not result in wildland fires, the additional risk posed by implementation of the PRMP is considered a potentially significant impact requiring mitigation.

It should be noted that the PRMP would be implemented over a long-term planning horizon, and would also accommodate, and be consistent with, the buildout of the Town's General Plan. Ongoing efforts to provide adequate levels of fire protection would help reduce risks associated with wildland fires. Applicable policies provided in the Town's General Plan that are intended to reduce wildland fire risk include the following:

- Policy S.3.L. All construction shall comply with wildland fire-safe standards, including standards established for emergency access, signing and building numbering, private water supply reserves available for fire use, and vegetation modification.
- Policy S.3.M. Involve local fire department in the development review process.
- Policy S.3.N. Minimize the incidence of fires by supporting the Mammoth Lakes Fire Protection District's (MLFPD) ability to respond to emergencies.
    - Action S.3.N.1. Assist in establishment and implementation of appropriate funding sources so that the MLFPD is prepared to respond to and mitigate emergencies.
    - Action S.3.N.2. Update Town-specific policies that further protect people and property from the risks of wildland and structural fire hazards.
- Policy S.3.O. Support provision of adequate water flow throughout the town and provision of adequate water storage to meet peak fire demand during times of peak domestic demands.
- Policy S.3.P. Maintain mutual aid agreements with other fire and emergency service agencies.
    - Action S.3.P.1. Coordinate with other agencies to develop a Fire Hazards Response Plan for the urban-wildland interface.
- Policy S.3.Q. Support creation and maintenance of firebreaks in coordination with Inyo National Forest and other land management agencies.

Although the General Plan includes the various measures to address the risk of exposure from wildland fires, and other measures required by ESRFSC and Section 4291 of the CPRC serve to minimize overall wildland fire risks in the PRMP area, the incremental increase parks and recreational facility use would in turn increase the potential wildland fire risk resulting from the implementation of the PRMP to a potentially significant level. **Mitigation Measure HAZ-2**, below, is recommended to reduce this impact to a less than significant level. With the implementation of this mitigation measure, potentially significant impacts with respect to fire hazard would be reduced to a less than significant level.

Mitigation Measures

HAZ-2 As individual projects are implemented under the PRMP, the Town shall undertake the following actions, in coordination with MLFPD, when applicable, to reduce the risk of wildfires: 1) maintain and incorporate adequate emergency access in project areas; 2) provide signage at picnic areas, parks, and trail heads relating to fire prevention (i.e., fire or smoking bans related to fire-risk levels); 3) provide fuel modification and other fuel treatment applications within project areas where appropriate; 6) ensure the maintenance and patrol of open recreational areas; and, 7)

enforce curfews or other rules to limit unwanted activity in project areas during daylight hours and after-hours.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact With Mitigation Incorporated. The operation of the PRMP's future park and recreational projects would not cause or generate waste materials or other debris that would be expected to violate waste discharge requirements. However, construction activities, such a grading and excavation, associated with the development of ball fields, tennis courts, a recreational center, and other buildings (such as an indoor swimming pool and skating rink), has the potential to expose soils to wind and water erosion. Soils and other debris in the surface water or groundwater would potentially violate water quality standards. To address water quality issues, the **Mitigation Measure HYD-1** is recommended. With the implementation of this mitigation measure, potentially significant impacts related to water quality standards would be reduced to a less than significant level.

Mitigation Measures

HYD-1 Where projects are not required to file a Storm Water Pollution Prevention Plan (SWPPP) on the Storm Water Multiple Application and Report Tracking System (SMARTS) system, each construction project shall install and maintain appropriate BMP's in conformance to the methods identified in the California Stormwater Quality Association (CASQA) handbook of Best Management Practices, Mammoth Lakes Basin Plan, and LWRQCB MOU. The BMP's used shall relate to the type of work required for each project. All BMP's shall be considered for each project following the BMP checklist. A note shall be made as to the reason for not incorporating any specific BMP.

b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less Than Significant Impact With Mitigation Incorporated. The Mammoth Community Water District (MCWD) provides water to the Town. Existing sources of water available to the MCWD include both surface water and groundwater. The primary source of water comes from surface water diverted from the Mammoth Creek watershed, plus eight ground water production wells within the Town.

Because many of the PRMP's park and recreational facilities are largely open space in character and would maintain overall permeability of the sites, groundwater volumes or recharge would not be significantly affected to the extent that a net deficit in aquifer volume or local groundwater table would occur. However, foundations for some potential recreational facilities, such as the indoor swimming pool, the skating rink, tennis courts, and a recreational center/gym would reduce the overall permeability of the development sites. This may also occur with any new paved parking areas. Under the 1991Memorandum of Understanding between the Town of Mammoth Lakes and the Lahontan Regional Water Quality Control Board (LRWQCB), development sites that would result in a net decrease in permeability are required to direct and control

runoff so that it would be returned to the groundwater or surface water system. The Town of Mammoth Lakes 2005 Storm Master Plan implements the Memorandum of Understanding through recommended procedures, including "where feasible, design retention/detention facilities to promote groundwater recharge" (Storm Drain Master Plan, Chapter 8). To ensure that these recommendations would be implemented where applicable, **Mitigation Measure HYD-2**, below, is recommended. With the implementation of this mitigation measure, potentially significant impacts related to groundwater recharge would be reduced to a less than significant level.

Mitigation Measures

HYD-2 For construction projects that would result in a net decrease in site permeability, collection, retention, and infiltration facilities shall be constructed and maintained to prevent transport of the runoff from a 20-year, 1-hour design storm from the developed site.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact With Mitigation Incorporated. Some components of the project, such as Mammoth Creek Park East and West, would be located along Mammoth Creek. However, none of the potential parks and recreational improvements, including Mammoth Creek Park East and West, would require the alteration of the course of Mammoth Creek. Although potential parks and recreational improvements would not be located within streams in a manner that could alter the course of the stream, future project sites may occur within, or near, drainage swales. Excavations or other activities in the course of the drainage swales would have the potential to result in the alteration of water flow in a manner that could result in erosion or siltation. The 1991Memorandum of Understanding between the Town and LRWQCB addresses the stabilization of drainage swales. To ensure that the LRWQCB's recommendation would be implemented where applicable, **Mitigation Measure HYD-3** is recommended. With the implementation of this mitigation measure, impacts with respect to alteration of drainage patterns resulting in siltation would be reduced to a less than significant level. A separate environmental document has been prepared for the PRMP's trails component (Town of Mammoth Lakes Trails System Master Plan (TSMP) and Sherwin Area Recreation Plan (SHARP) EIR (2011)). As discussed therein, some recreational trails could bridge or follow streams and cause potential impacts. The potential for future recreational trails to impact drainage patterns and cause siltation is addressed in the latter EIR. As described therein, mitigation measures specific to erosion would reduce the potential impact of recreational trails to less than significant levels.

Mitigation Measures

HYD-3 Any drainage swales disturbed by construction activities shall be stabilized by the addition of crushed rock or riprap as necessary or other appropriate stabilization methods.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

Less Than Significant Impact With Mitigation Incorporated. Some components of the project, such as Mammoth Creek Park East and West, would be located along Mammoth Creek. However, none of the potential parks and recreational improvements, including Mammoth Creek Park East and West, would require the alteration of the course of Mammoth Creek. As discussed under Response No. IX (b), foundations for certain potential recreational facilities, such as an indoor swimming pool, the skating rink, tennis courts, and a recreational center/gym would reduce the overall permeability of the development sites and, as such, would have the potential to increase the amount of surface runoff. This may also occur with any new paved parking areas. Under the 1991Memorandum of Understanding between the Town of Mammoth Lakes and the Lahontan Regional Water Quality Control Board (LRWQCB), "Drainage collection, retention, and infiltration facilities shall be constructed and maintained to prevent transport of the runoff from a 20-year, 1-hour design storm from the project site." The implementation of this objective, expressed in **Mitigation Measure HYD-2**, above, would control surface runoff during large storm conditions and, as such, would reduce impacts associated with the flooding potential of future PRMP projects to a less than significant level.

Mitigation Measures

Refer to **Mitigation Measure HYD-2**. No additional mitigation measures are necessary.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact with Mitigation Incorporated As discussed under Response No. IX (b), above, foundations for some recreational projects, such as tennis courts or new buildings, would reduce the permeability of the respective development sites. Any increase in runoff to the storm sewer serving the future site would be addressed by **Mitigation Measure HYD-2**, which would require the collection, retention, and infiltration of runoff from a 20-year, 1-hour design storm. With the development of retention systems under **Mitigation Measure HYD-2**, runoff would be released gradually to the storm sewer system and impacts with respect to existing or planned storm system capacity would be less than significant.

Mitigation Measures

Refer to **Mitigation Measure HYD-2**. No additional mitigation measures are necessary.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact With Mitigation Incorporated. Impacts with respect to water quality and storm water retention are addressed under Responses No. IX (a), above. As discussed therein, any potential water quality impacts would be reduced to a less than significant level through the implementation of **Mitigation Measure HYD-1**.

Mitigation Measures

Refer to **Mitigation Measure HYD-1**. No additional mitigation measures are necessary.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. Project implementation would not involve the development of residential land uses or the construction of housing; therefore no impact would occur in this regard.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

Less Than Significant Impact With Mitigation Incorporated. Some components of the project, such as Mammoth Creek Park East and West, would be located in the proximity of Mammoth Creek or intermittent streams in the area. Any flooding impacts associated with the PRMP's Trail components, which may bridge or follow streams, are separately addressed and mitigated in the Mitigation Monitoring and Reporting Program (MMRP) prepared for the Town of Mammoth Lakes Trails System Master Plan EIR. The FEMA-designated 100-year flood zone for the Town of Mammoth Lakes is limited to areas very close to the shoreline of Mammoth Creek and would not affect most the of the PRMP's parks and recreational facilities. However, to ensure that flooding is not exacerbated or worsened by construction activities or location of habitable structures[12] within the flood zone **Mitigation Measures HYD-4 and HYD-5**, are recommended. With the implementation these mitigation measures, potentially significant impacts with respect to flooding would be reduced to a less than significant level.

Mitigation Measures

HYD-4 Construction of any habitable structures, such as indoor recreational uses, located within the 100-year flood plain as designated by the FEMA flood map for the Town of Mammoth Lakes and region shall be designed and implemented in accordance with Municipal Code 12.10: Floodplain Management.

HYD-5 No surplus construction or waste material shall be placed in drainage ways or within the 100-year flood plain of surface waters.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. Potential parks and recreational improvements under the PRMP are not located in levee or dam inundation areas. Therefore, people and structures would not be exposed to significant risk of loss, injury or death involving flooding from dams or levees. No impact would be expected with respect to this issue.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of the sea floor associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

[12] *Habitable structures are defined as any structures that are occupied on a daily basis by visitors, residents, or employees.*

The PRMP area is not subject to tsunami hazards. Potential impacts from mudflows are considered to be negligible given the varying topography and heavily vegetated nature of the Town and surrounding area. Also, the Project does not propose any habitable structures near a large body of water that would be subject to hazards created by a seiche. Thus, no impacts associated with inundation by seiche, tsunami, or mudflows are anticipated.

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The PRMP's park and recreational components would be located in various locations throughout the Project Area and are intended to provide recreational amenities that would encourage neighborhood residents and community members to interact and participate in recreational activities. Future parks and recreational facilities would not be located on existing, developed residential properties and, as such, would not have a physical effect on established communities. Given that the proposed facilities are anticipated to increase social interactions among Town residents as well as visitors and would not cause a physical disruption to established residential neighborhoods, related to the physical division of an established community would be less than significant.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact With Mitigation Incorporated. The PRMP would replace the 1990 Parks and Recreation Element and includes policies recommended for incorporation into the Parks, Open Space and Recreation of the Town's 2007 General Plan. In addition to changes that occurred with parks and recreational facilities since 1990, changes in outdoor recreation anticipated in Mammoth Lakes, and largely confirmed by public input received during development of the PRMP, reflect trends that are expected statewide. These include:

- Acquiring more parkland and recreation facilities to serve a growing population
- Balancing the different recreation and leisure needs of families, those who prefer more solitary activities, and people with different physical abilities
- Responding to needs of an aging population and greater numbers of retirees
- Providing facilities and programs to accommodate increased racial and cultural diversity in the population
- Meeting demand for novel and "extreme" recreation experiences, often associated with travel and adventure
- Using trails to enhance the visitor experience and integrate recreation with routines of daily life
- Recognizing that parks and recreation programs can address health issues, such as obesity, heart disease, and stress

- Forming strategic partnerships to provide and operate recreation facilities and deliver recreation programs

The PRMP is intended to provide a vision for future parks and recreational facilities to serve the year-round recreational needs of the Town through the year 2025. The analysis of land use impacts considers the consistency of the PRMP with adopted land use plans and policies that relate specifically to recreation. The PRMP incorporates the text of the Parks, Open Space, and Recreation Element of the 2007 General Plan, which currently consists of Goals P.1 through P.5 and respective policies and actions. The PRMP includes a new goal (Goal 6 of the PRMP) and supplements the policies of Goals P.1 through P.5 of the General Plan. The respective goals of the PRMP are as follows.

> Goal 1. Maintain parks and open space within and adjacent to town for outdoor recreation and contemplation (identical to General Plan Goal P.1).
>
> Goal 2. Provide additional parks within town (identical to General Plan Goal P.2).
>
> Goal 3. Create a Master Plan for an integrated trail system that will maintain and enhance convenient public access to public lands from town (identical to General Plan Goal P.3).
>
> Goal 4. Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages (identical to General Plan Goal P.4).
>
> Goal 5. Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes (identical to General Plan Goal P.5).
>
> 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 (this New Goal is not currently in the General Plan).

All existing General Plan goals, policies, and actions are part of the PRMP. However, only the PRMP's newly proposed policies, which are not currently part of the General Plan, are listed below. With the exception of the additions listed below, the PRMP would not change any of the text of the General Plan's goals, policies, or actions. Proposed new policies of the PRMP, recommended for inclusion in the General Plan are listed below.

- Existing General Plan Goal P.1 does not currently have any policies. The following policies represent new policies that would update the General Plan's Parks, Recreation, and Open Space Element and are the only policies related to PRMP Goal 1 (General Plan Goal P.1):
  - Policy 1. Protect the scenic beauty and natural resources of Mammoth Lakes through a Parks and Recreation Master Plan that includes parks, open space, and a trail system.
  - Policy 2. Continue to maintain and upgrade existing parks and recreation facilities, and design all new facilities to ADA standards and provide for accessibility and enjoyment by physically impaired citizens.
  - Policy 3. Upgrade parks and recreation facilities to promote efficient and cost-effective maintenance practices.

- Policy 4. Ensure adequate funding for ongoing maintenance and rehabilitation of existing parks and recreation facilities.

- PRMP Goal 2 would include Policies 2A through 2E of the General Plan Goal P.2, as well the following additional policies that would be added to PRMP Goal 2 (General Plan Goal P.2)
  - Policy 1. Promote Mammoth Lakes' quality of life with parkland and recreation facility acquisition and development at or above the level of service standards recommended in this Plan.
  - Policy 2. Provide parks and recreation facilities in a timely manner with existing and planned development.
  - Policy 3. Engage continued citizens' involvement in planning parks and recreation facilities, and periodically re-evaluate the provision of these facilities through a needs assessment study.
  - Policy 4. Seek funding from a variety of sources to acquire and develop new parks, and maintain adequate funding for operation and maintenance of new parks and recreation facilities.
  - Policy 5. Design and build parks and recreation facilities to ensure compatibility with the surrounding neighborhood and natural environment.
  - Policy 6. Assure that new parks and recreation facilities comply with ADA standards, for safe use and enjoyment by physically impaired citizens.
  - Policy 7. Develop parks and recreation facilities to facilitate efficient and cost-effective maintenance practices.
- PRMP Goal 3 would include Policies 3A through 3C of the General Plan Goal P.3, as well the following new policy that would be added to PRMP Goal 3 (General Plan Goal P.3)
  - Policy 1. Support the construction of trails to provide public access from Town to public lands.
- PRMP Goal 4 would include Policies 4A through 4c of the General Plan Goal P.4, as well the following additional policies that would be added to PRMP Goal 4 (General Plan Goal P.4)
  - Policy 1. In partnership with the U.S. Forest Service, coordinate planning for compatible recreational uses and facilities on and adjacent to USFS lands.
  - Policy 2. Partner with Mammoth Unified School District to fully utilize existing Town recreation facilities by students, and broaden public use of school facilities after school and during evenings and weekends.
  - Policy 3. Partner with private organizations to deliver recreation programs and provide and/or operate special purpose facilities.
  - Policy 4. Acquire, construct, or upgrade indoor recreation facilities to accommodate desired indoor recreation activities and leisure programs.
  - Policy 5. Provide recreation facilities, programs, and classes that are available to all citizens, including people of all ages, abilities, ethnic background, and income levels. Keep programs affordable, and develop program packages for those with more moderate incomes (including seasonal workers).
  - Policy 6. Develop a reservation and pricing policy for exclusive use of certain facilities.

- Policy 7. Develop a Town Park Management Program.
  - The Program could include a Park Ranger to monitor park use and activities.
  - Park Rangers could help conduct programs.
- Policy 8. Promote awareness of the Town's parks and recreation facilities, programs, and special events.

- PRMP Goal 5 would include Policies 5A through 5H of the General Plan Goal P.5, as well the following new policies that would be added to PRMP Goal 5 (General Plan Goal P.5)
  - Policy 1. Develop an integrated trail system in cooperation with federal agencies and consistent with the Town's General Plan (Mobility Element), by updating the General Bikeway Plan and Trail System Plan.
  - Policy 2. The trail system should accommodate winter and summer use by a variety of users, including pedestrians, bicyclists, and Nordic sports enthusiasts.
  - Policy 3. The trail system should connect parks, schools, other designated activity centers, and trails on public lands adjacent to Mammoth Lakes.
  - Policy 4. Create an integrated way-finding system that encompasses trails, parks, and recreation facilities with unified and consistent signage design.
- New PRMP Goal 6 would include the following policies:
  - Policy 1. Plan parks and recreation facilities and develop recreation programs with public input.
  - Policy 2. Distribute parkland within the community to increase walkability from key residential nodes.
  - Policy 3. Offer and accommodate events and activities that foster community gathering and celebration.
  - Policy 4. Encourage neighborhood district identity and cohesion through events and programs.
  - Policy 5. Provide facilities and programs that support togetherness within and among families.

With the exception of new Goal 6 and additions to General Plan Policies P.1 through P.5 (PRMP Policies 1 through 5), the PRMP would be identical to and, therefore, consistent with the goals and policies of the General Plan. The addition of PRMP Goal 6 and proposed Policies 1 through 5 is consistent with the primary goal of the General Plan to provide a wide variety of recreational opportunities for the Town and its visitors. These additions provide more specificity to the measures that direct the manner in which recreational resources would be provided. As such, the new language, recommended for inclusion in the General Plan, would strongly support the existing objectives and vision of the 2007 General Plan. Because the PRMP would be consistent with General Plan, impacts would be less than significant.

Parks and recreational facilities under the PRMP would be generally located within the UGB and, therefore, not subject to other land use plans. However, certain trail components are planned under the Town of Mammoth Lakes TSMP and SHARP that would extend into USFS lands and would be subject to the applicable policies of the *Inyo National Forest Land and Resource Management Plan*. Although trails are a component of the PRMP, the environmental impacts and relationship of the trails to applicable land use plans are

separately addressed and, where indicated, mitigated in the EIR prepared by the Town for the TSMP and SHARP (see Town of Mammoth Lakes Trails System and Sherwins Area Recreational Plan EIR (2011)).

Greater use of the Whitmore Regional Park playing fields and the possible temporary enclosure of the Whitmore swimming pool are other potential components of the PRMP. Any change in uses or facilities at Whitmore Park would be subject to the requirements of the Mono County General Plan and the Mammoth-Yosemite Airport ALUP. The Mono County General Plan and the ALUP prohibit certain flashing or bright lights directed toward an aircraft engaged in take-off or landing; any use that would cause sunlight to be reflected toward an aircraft; any use that would generate large amounts of smoke or steam; any use that would generate electrical interference, and uses that would attract large concentrations of birds. Structures within the ALUP planning boundary may not exceed 35 feet and land uses may not result in concentrations of people exceeding 25 persons per acre (e.g. shopping centers, restaurants, schools, hospitals, stadiums/arenas, and office complexes). According to the IS/MND for the Whitmore Park Track and Sports Field, no more than 236 athletes or other users would be on-site at the same time the Project's seating areas are filled to capacity (this number of people would be consistent with the ALUP's density criterion). As discussed under Aesthetics Responses No. I(b) (scenic highways), I(d) (light and glare) and Hazards Responses No. VIII(e) and (f) (airport hazards), above, with the exception of the possible swimming pool enclosure (which would not exceed 35 feet), the PRMP does not anticipate the construction of new structures at Whitmore Park. The implementation of **Mitigation Measures AES-1, AES-11**, and **HAZ-1**, the PRMP, discussed above, would bring the PRMP into consistency with the requirements of the Mono County General Plan and the Mammoth-Yosemite ALUP.

Mitigation Measures

Refer to Mitigation Measures **AES-1, AES-11, and HAZ-1**. No additional mitigation measures are necessary.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. At this time there are no adopted or on-going region-wide habitat conservation plans in the area that would apply to the Project Area. Thus, no impact would occur in this regard.

XI. MINERAL RESOURCES

Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Mineral resources in the Project Area include industrial minerals (clay, aggregate, cinders, etc.) and precious metals associated with volcanic rocks and hot spring and geothermal activity. Implementation of the PRMP's parks and recreational facilities would not impede the potential for direct use or future exploration of mineral resources and would not result in the loss of availability of known mineral resources. Potential parks and recreational improvements under PRMP do not propose mineral development activities. Therefore, the PRMP would have no impact regarding known mineral resources.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The PRMP would not affect any mineral resources delineated on a land use plan of the area or result in the loss of availability of mineral resources of local importance. Therefore, the PRMO result in no impact regarding locally-important mineral resources.

XII. NOISE

Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. Noise is usually defined as sound that is undesirable because it interferes with speech/communication and hearing, or is otherwise annoying (unwanted sound). The decibel (dB) is a conventional unit for measuring the amplitude of sound because it accounts for the large variations in sound pressure amplitude and reflects the way people perceive changes in sound amplitude.[13]

Community noise levels usually change continuously during the day. The equivalent sound level (L_{eq}) is normally used to describe community noise. The L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval. For intermittent noise sources, the maximum noise level (L_{max}) is normally used to represent the maximum noise level measured during the measurement.

The 2007 General Plan, Goal C.6 recognizes that community character would be enhance by minimizing noise. Policies and actions that would implement this goal include the following:

- Policy C.6.A. Minimize community exposure to noise by ensuring compatible land uses around noise sources.
- Policy C.6.B. Allow development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worst-case noise levels, either existing or future, with future noise levels to be predicted based on projected 2025 levels.
- Policy C.6.C. Development of noise-sensitive land uses shall not be permitted in areas where the noise level from existing stationary noise sources exceeds the noise level standards described in the Noise Element.
- Policy C.6.D. Require development to mitigate exterior noise to "normally acceptable" levels in outdoor areas.
    - Action C.6.D.1. Assess existing sources of outdoor noise and develop criteria and standards for outdoor noise.

[13] *All sound levels, measured in decibel (dB), in this study are relative to $2x10^{-5}$ N/m^2.*

- Policy C.6.E. Address noise issues through the planning and permitting process.
- Policy C.6.F. Require mitigation of all significant noise impacts as a condition of project approval.
- Policy C.6.G. Require preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all proposed projects that may result in potentially significant noise impacts.
    - Action C.6.G.1. Adopt significance thresholds to be used to assess noise impacts for projects reviewed under the CEQA process, and develop a list of acceptable mitigations that might be applied to mitigate noise impacts to acceptable levels, including specific guidelines for their implementation.
    - Action C.6.G.2. Adopt criteria and location maps that specify the locations and circumstances under which a noise analysis or acoustical study will need to be prepared for a proposed project. Develop guidelines for conducting such studies.

Chapter 8.16 of the Mammoth Lakes Municipal Code (Town Noise Ordinance) controls unnecessary, excessive and annoying noise in the Town. However, this chapter does not control noise sources that are preempted by other jurisdictions including in-flight aircraft and motor vehicles operating on public rights-of-way. As outlined in Section 8.16.070 of the Town Noise Ordinance and presented in **Table B-2**, *Town Exterior Noise Ordinance Standards*, the Town has established maximum exterior noise levels based on land use zones. Noise levels in excess of the levels indicated in Table B-2 are conditionally permitted, depending on the intensity of the noise and the duration of exposure.[14]

The Town Noise Ordinance also states that interior noise levels resulting from outside sources within residential units shall not exceed 45 dBA L_{50} between 7 A.M. and 10 P.M., and 35 dBA L_{50} between 10 P.M. and 7 A.M.[15] If the existing interior or exterior ambient noise level exceeds that permissible within the noise limit categories, the allowable noise exposure standard is increased in five dBA increments in each category as appropriate to encompass or reflect the ambient noise level (Section 8.16.070 and 8.16.080 of the Town Noise Ordinance).

The Town Noise Ordinance identifies specific restrictions regarding construction noise. As outlined in Section 8.16.090 of the Town Noise Ordinance and presented in **Table B-3**, *Town Construction Noise Standards*, the Town has established maximum exterior noise levels from the operation of equipment used in construction, drilling, repair, alteration or demolition work. All mobile and stationary internal-combustion-powered equipment and machinery is also required to be equipped with suitable exhaust and air-intake silencers in proper working order.

[14] *Noise levels may not exceed the exterior noise standard for a cumulative period of more than thirty minutes in any hour; or plus five decibels for a combined period of more than fifteen minutes in any hour; or plus ten decibels for a combined period of more than five minutes in any hour; or plus fifteen decibels for a combined period of more than one minute in any hour; or plus twenty decibels for any period of time (maximum noise level).*

[15] *Noise levels may not exceed the interior noise standard for a cumulative period of more than five minutes in any hour; or plus five decibels for a combined period of more than one minute in any hour; or plus ten decibels for any period of time (maximum noise level).*

Table B-2

Town Exterior Noise Ordinance Standards

Receiving Land Use	Time Period	Noise Zone Classification[a] Maximum Noise Levels (dBA) L_{50} Rural/ Suburban	Suburban	Urban
One and Two Family Residential	10 P.M. to 7 A.M.	40	45	50
	7 A.M. to 10 P.M.	50	55	60
Multiple Dwelling Residential/Public Space	10 P.M. to 7 A.M.	45	50	55
	7 A.M. to 10 P.M.	50	55	60
Limited Commercial/Some Multiple Dwellings	10 P.M. to 7 A.M.		55	
	7 A.M. to 10 P.M.		60	
Commercial	10 P.M. to 7 A.M.		60	
	7 A.M. to 10 P.M.		65	
Light Industrial	Anytime		70	
Industrial	Anytime		75	

[a] *The classification of different areas of the community in terms of environmental* noise *zones shall be determined by the* noise *control officer, based upon assessment of community* noise *survey data. Additional area classifications should be used as appropriate to reflect both lower and higher existing ambient levels than those shown. Industrial* noise *limits are intended primarily for use at the boundary of industrial zones rather than for* noise *reduction within the zone.*

[b] *Noise levels may not exceed the interior noise standard for a cumulative period of more than five minutes in any hour; or plus five decibels for a combined period of more than one minute in any hour; or plus ten decibels for any period of time (maximum noise level).*

[c] *If the existing interior or exterior ambient noise level exceeds that permissible within the noise limit categories above, the allowable noise exposure standard is increased in five dBA increments in each category as appropriate to encompass or reflect the ambient noise level.*

Source: Town Noise Ordinance, Municipal Code Section 8.16.070

Construction activities for individual projects would be completed over the course of several years (through year 2025). Construction of individual projects would occur as funding and resources become available over time with the duration of construction dependent on individual project types.

Noise from construction activities would be generated by vehicles and equipment during various stages of construction operations: grading, paving, building construction, and paving. The noise levels created by construction equipment will vary depending on factors such as the type of equipment, the specific model, the operation being performed and the condition of the equipment.

In an outdoor environment, sound levels attenuate through the air as a function of distance. Such attenuation is called "distance loss" or "geometric spreading" and is based on the source configuration, point

Table B-3

Town Construction Noise Standards

Construction Equipment [a]	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Areas Semi-Residential Commercial [a]	Business Properties
Mobile Equipment [b]				
Daily, except Sundays and legal holidays; 7:00 A.M. to 8:00 P.M.	75 dBA L_{50}	80 dBA L_{50}	85 dBA L_{50}	----
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA L_{50}	64 dBA L_{50}	70 dBA L_{50}	----
Daily, including Sunday and legal holidays, all hours	----	----	----	85 dBA L_{50}
Stationary Equipment [c]				
Daily, except Sundays and legal holidays; 7:00 a.m. to 8:00 p.m.	60 dBA L_{eq}	65 dBA L_{eq}	70 dBA L_{eq}	----
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA L_{eq}	55 dBA L_{eq}	60 dBA L_{eq}	----
Daily, including Sunday and legal holidays, all hours	----	----	----	75 dBA L_{50}

[a] *All mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order.*

[b] *Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment (e.g., excavator, backhoe, dozer, etc.).*

[c] *Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment (e.g., generators, compressors, etc.).*

Source: Town Noise Ordinance, Municipal Code Section 8.16.090.

source or line source. For a point source such as construction equipment, the rate of sound attenuation is 6 dB per doubling of distance from the noise source. For example a noise level of 85 dBA at a reference distance of 50 feet from the equipment would attenuate to 79 dBA at 100 feet, and 73 dBA at 200 feet.

For larger projects, such as a recreation center/gym, tennis courts, soccer/all purpose fields, etc., portions of the some existing sites would be graded. Site preparation activities typically involve the use of heavy equipment, such as dozers, tractors, loaders, paver etc. Trucks would also be used to deliver equipment and building materials, and to haul away landscape and construction debris. Smaller equipment, such as trencher, and forklift could also be used during the construction phases. This equipment would generate both steady-state and episodic noise that could be heard both on and off the project site.

Individual pieces of construction equipment that would likely be used for construction of the large project would produce maximum noise levels of 77 dBA to 85 dBA at a reference distance of 50 feet from the noise source, as shown in **Table B-4,** *Construction Equipment Noise Levels*, below. These maximum noise levels would occur when equipment is operating under full power conditions. However, equipment used on construction sites often operates under less than full power condition, or partial power. The estimated noise

Table B-4

Construction Equipment Noise Levels

Equipment	Estimated Usage Factor, %	Typical Noise Level at 50 feet from Equipment, dBA (L_{max})
Crane	40	81
Dozer	40	82
Forklift	10	75
Graders	40	85
Other Equipment	50	85
Paver	50	77
Tractors/Loaders/Backhoes	25	80
Water Trucks	10	80

Source: FHWA Roadway Construction Noise Model, 2005.

levels represent a conservative scenario because construction activities are analyzed as if occurring along the perimeter of the construction area; whereas, construction would typically occur throughout the site, farther from noise-sensitive receptors.

Construction of improvements at recreation nodes is unlikely to simultaneously occur since construction ultimately would be contingent on funding. However, construction noise could be localized, thereby potentially affecting areas immediately within 500 feet from the construction site. Noise levels generated by construction equipment would range from 75 to 85 dBA L_{eq} at a distance of 50 feet from construction equipment. Noise levels usually diminish at a rate of approximately 6 dBA per doubling of distance. As heavy equipment passes near the project boundary of the construction site, the peak construction noise level at a given moment in time could reach 81 dBA; however, as the equipment travels near the center of the project site, it would be approximately 160 feet from the closest residential uses and generate a lower noise level of approximately 75 dBA.

Construction activities are expected to occur only during daytime hours as described by *Section 8.16.090 of the Town Noise Ordinance*. However, without incorporation of mitigation measures, the construction-period noise levels could generate a potentially short-term significant impact. Implementation of **Mitigation Measures N-1 through N-3** would reduce potentially significant construction noise impacts are reduced to a less than significant level when noise sensitive receptors are located within 50 feet from the MUP construction sites.

The PRMP envisions a potential increase in parks and recreational facilities and programs. Although recreational activities are not typically significant noise generators certain types of activities occurring within parks and recreation areas (e.g. amplified announcements, crowd noise, and large special events could expose people to temporary or permanent noise levels in excess of standards established in the Town of Mammoth Lakes Noise Ordinance.

The PRMP is a policy-level document that does not include any site specific designs or project proposals, or grant any entitlements for development. It is expected, however, that the PRMP anticipates land uses that are consistent with the land use designations established by the General Plan. In addition, future recreational projects would require compliance with Town's Noise Ordinance and General Plan policies related to noise standards, which include minimizing community exposure to noise by ensuring compatible land uses around noise sources (Policy C.6.A.); allowing development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worst-case noise levels, either existing or future, with future noise levels to be predicted based on projected 2025 levels (Policy C.6.B.); requiring development to mitigate exterior noise to "normally acceptable" levels in outdoor areas (Policy C.6.D.); addressing noise issues through the planning and permitting process (Policy C.6.E.); require mitigation of all significant noise impacts as a condition of project approval (Policy C.6.F.); requiring preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all proposed projects that may result in potentially significant noise impacts (Policy C.6.G.). In addition, the Town's Special Event Permit requirement regulates special events, including limits on the sound level and duration of amplified music or sound at such events; the Noise Ordinance (Municipal Code Chapter 8.16) generally limits amplified sound, such as music and loudspeakers to between the hours of 7AM and 10PM.

Code Section 8.16.070 establishes exterior noise limits for uses listed in the ordinance, which include single and multi-family residences, but not other sensitive receptors, such as hospitals, churches, and schools. Noise ordinance criteria related to increases in exterior noise levels include the following:

"No person shall operate or cause to be operated any source of sound at any location within the town or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measured on any other property to exceed:

1. The noise standard on any property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measures at any other property to exceed the noise standard of that land use described in Table 1[16] for a cumulative period of more than thirty minutes in any hours; or
2. The noise standard plus five dB or a cumulative period of more than fifteen minutes in any hour; or
3. The noise standard plus ten dB for a cumulative period of more than five minutes in any hour; or
4. The noise standard plus fifteen dB for a cumulative period of more than one minute in any hour; or
5. The noise standard plus twenty dB or the maximum measured ambient level, for any period of time.

If the measured ambient level differs from that permissible within any of the first four noise limit categories above the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to reflect the ambient noise levels. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level."

With the enforcement of Section 8.16.070, noise impacts during operation would be reduced to less than significant levels with respect to single family and multi-family uses (sensitive receptor sites). However, these criteria would not be applicable to churches, hospitals, and schools. As such, the potential exists for potentially significant ambient noise increases at any of the latter sensitive receptor sites that may be located

[16] *Table 1 of the Noise Ordinance is the same as Table B-2 of this MND analysis.*

near potential new or expanded parks and recreational facilities. **Mitigation Measure N-4** would include churches, hospitals, and schools in the standards set forth under Section 8.16.070. Mitigation of operational noise impacts also include site plan review to identify potential noise sources prior to construction and the compatibility of such uses with existing or proposed sensitive uses (see **Mitigation Measures N-4 and N-5**, below). With the implementation of **Mitigation Measures N-4 and N-5**, potentially significant operational impacts would be reduced to a less than significant level.

Mitigation Measures

N-1 Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

N-2 To the extent feasible, construction activities shall be scheduled so as to avoid operating several pieces of heavy equipment as loaders, water truck, dozer, and other heavy equipment simultaneously as possible, which causes high noise levels.

N-3 The construction staging area shall be located as far as feasible from sensitive receptors.

N-4 Code Section 8.16.070 (exterior noise standards) shall be applied to churches, schools, and hospitals according to the same ambient noise standard applicable to multi-family residential uses, for the construction of new parks and recreation facilities or new uses at existing facilities.

N-5 Prior to approval of final site plans for new or expanded recreational facilities that have the potential to include new significant noise sources, or substantially increase the noise associated with an existing facility, site plans shall be reviewed to determine the proximity of noise sensitive receptors (residential uses, hospitals, churches and schools) to future noise sources. A noise study shall be prepared to determine if potential noise levels would exceed ambient levels by 5 dBA or more at the property boundary of the sensitive receptor site. Noise sources may also include including traffic generated by such facilities. If it is determined that potential future levels would exceed ambient noise levels by 5 dBA or more, site plans shall be redesigned to reduce ambient levels at the sensitive receptor by any of the following measures:

a. Increasing the distance between the potential noise source and sensitive receptor to achieve consistency with Municipal Code Section 8.16.070 or Mitigation Measure N-4,

b. Placement of a noise barrier between the noise source and sensitive receptor including such devices such as solid walls, berms, or enclosure of noise sources, or other measures to attenuate noise to a level consistent with Municipal Code Section 8.16.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The response of

humans, buildings, and equipment to vibration is more accurately described using velocity or acceleration.[17] Vibration amplitudes are usually described as either peak, as in peak particle velocity (PPV) or root-mean-square (RMS). The peak level represents the maximum instantaneous peak of the vibration signal and the RMS represents the average of the squared amplitude of the vibration signal. In addition, vibrations can be measured in the vertical, horizontal longitudinal, or horizontal transverse directions. Ground vibrations are most often greatest in the vertical direction.[18] Therefore, the analysis of ground-borne vibration associated with the Project is discussed as vertical direction.

Section 8.16.020 of the Town Noise Ordinance controls unnecessary or excessive vibration effects. According to Section 8.16.090 of the Ordinance, operating or permitting the operation of any device that creates a vibration above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at one hundred fifty feet (forty-six meters) from the source if on a public space or public right-of-way. Noise Ordinance defines, "vibration perception threshold" as the minimum ground-borne or structure-borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as, but not limited to, sensation by touch or visual observation of moving objects.

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The vibration level anticipated from typical construction would be reduced below 0.04 inches per second PPV (the perception threshold) approximately 43 feet away from a sensitive receptor.

The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures.

Project construction activities would generate ground-borne vibration during site clearing and grading activities or large bulldozer operation where heavy construction equipment would be required. Vibration velocities from the operation of project construction equipment would range from approximately 0.003 to 0.089 inches per second PPV at 25 feet from the source of activity. For sensitive land uses adjacent to construction sites, vibration impacts could exceed the value of 0.04 inches per second (PPV) (threshold criteria), vibration impacts during construction; however, the vibration level anticipated from typical construction would be reduced below 0.04 inches per second PPV (the perception threshold) approximately 43 feet away from a sensitive receptor. Section 8.16.020 of the Noise Ordinance requires that vibration perception levels shall not exceed the perception threshold 150 feet from the source. Because the construction activities would not exceed the vibration perception levels beyond 43 feet from the source, construction vibration levels would be consistent with the requirements of the Noise ordinance. Therefore, vibration impacts would be less than significant.

[17] *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, Final Report, page 7-3, April 1995.*

[18] *California Department of Transportation (Caltrans), Transportation Related Earthborne Vibrations, page 4, February 2002.*

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. Some of the projects under the PRMP may generate increases in ambient noise levels during periods of use, particularly the sports fields and other outdoor activities. Locations of these types of facilities could subject residents in nearby areas to ambient noise levels exceeding those set forth in the Noise Ordinance, which would be considered significant. Therefore, a mitigation measure is recommended to ensure that site plans for proposed recreational uses located in residential areas would be reviewed for potential noise sources. Where potential ambient noise levels would exceed the Noise Ordinance standards, attenuation or avoidance mitigation measures would reduce noise conflicts prior to development. With the implementation of **Mitigation Measures N-4 and N-5**, above, potentially significant impacts with respect to ambient noise levels during operation of future recreational facilities would be reduced to less than significant levels.

Mitigation Measures

Refer to **Mitigation Measures N-4 and N-5**. No additional mitigation measures are necessary.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. As discussed under Response No. XII (c), above, some of the projects under the PRMP may generate temporary or periodic increases in ambient noise levels, particularly the sports fields and other outdoor activities. Locations of these types of facilities could subject residents in nearby areas to ambient noise levels exceeding those set forth in the Noise Ordinance. Therefore, a mitigation measure is recommended to ensure that site plans for proposed recreational uses located in residential areas would be reviewed for potential noise sources. Where potential ambient noise levels would exceed the Noise Ordinance standards, attenuation or avoidance would reduce noise conflicts prior to development. With the implementation of **Mitigation Measure N-4**, potentially significant impacts with respect to ambient noise levels during operation of future recreational facilities would be reduced to less than significant levels.

Mitigation Measures

Refer to **Mitigation Measure N-4**. No additional mitigation measures are necessary.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. Whitmore Regional Park, which may be more frequently used under the PRMP, is located 0.5-mile from the Yosemite-Mammoth Airport. The use of Whitmore Regional Park under the PRMP would be temporary and associated with recreational activities. Because the PRMP would not introduce residential development, offices, or other uses that are continually occupied for long periods of time, it would, therefore, not expose a residents or workers to excessive airport related noise levels at this location. Therefore, impacts associated with airport noise levels would be less than significant.

f. For a project within the vicinity of a private airstrip, heliport or helistop, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The Yosemite-Mammoth Airport area is the nearest location for heliports or private airstrip use to the Project Area. The use of Whitmore Regional Park (the single site under the PRMP within the vicinity of heliports and other air fields) would be recreational and of a temporary nature. The site is not residential and is not be occupied by large numbers people for long periods of time. Therefore, the PRMP would not expose residents or workers to excessive airstrip or heliport-related noise levels. Impacts would be less than significant.

XIII. POPULATION AND HOUSING

Would the project:

a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The purpose of the PRMP is to serve the recreational needs of residents and visitors to Mammoth Lakes under existing and future population levels. The PRMP would serve the Town's existing population and the growth in population already anticipated under the General Plan and is not expected, in itself, to induce substantial population growth either directly or indirectly. The Town's possible expanded parks and recreational facilities would not increase the attraction of the area's natural resources, which are the focus of tourism or residential growth in the area. The PRMP would not substantially increase the area's employment opportunities or cause a demographic change because of other direct or indirect opportunities that would increase employment opportunities in the area. Therefore, impacts with respect to population growth would be less than significant.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact. The potential development of parks and recreational improvements under the PRMP would not occur on lands developed with substantial numbers of housing units or cause the loss or removal of substantial replacement housing. The construction of replacement housing would not be required. Therefore, no impact with respect this issue would occur.

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact. The potential development of parks and recreational improvements under the PRMP would not occur in heavily occupied sites or cause the displacement of substantial numbers of people. The PRMP would not require the construction of replacement housing. Therefore, no impact with respect this issue would occur.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection.

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response No. VIII (h), above, fire protection services are provided by Mammoth Lakes Fire Protection District. Mammoth Lakes is located in an area that has a significant amount of forested land and has been rated as having a very high fire potential. Some of the Project's proposed trail system components may be placed in areas where the risk of wildfire is particularly acute.

As discussed under Response No. VIII (h), new parks and recreational facilities, including trails, could increase the number and variety of potential ignition sources for wildland fires including illegal or inappropriate burning, fires started by recreational vehicles, improper disposal of cigarettes, barbecues, and other sources. The implementation of General Plan Policies S.3.L through S.3.Q described in Response No. VIII (h), above, as well as the implementation of **Mitigation Measure HAZ-2** (see Response No. VIII (h) of this Initial Study) are considered to reduce fire hazards to a less than significant level. Through the reduction of fire hazard through General Plan policies and recommended mitigation, the potential impact on fire services would be similarly reduced. As such the project is not expected to result in the need for new or physically altered police facilities. With the implementation of **Mitigation Measure HAZ-2**, potentially significant impacts to fire services would be reduced to a less than significant level.

Mitigation Measures

Refer to **Mitigation Measure HAZ-2**. No additional mitigation measures are necessary.

b. Police protection.

Less Than Significant Impact. The Mammoth Lakes Police Department provides police services to the Project Area. Police services are generally related to police / population ratios. As discussed under Response No. XIII (a), above, the PRMP would serve the Town's existing population and the growth in population already anticipated under the General Plan, but would not induce substantial direct or indirect population growth in itself. Future parks and recreational facilities could increase outdoor social activities and, therefore, increase police service calls during periods of high recreational use; increase the opportunities for vandalism of public property; and increase the need for occasional surveillance.

Increased demand for police services community-wide under the General Plan buildout is expected to be addressed by adopted police enforcement policies of the General Plan so that a high level of police services would be maintained. General Plan enforcement policies include the following:

- Policy S.2.B. Ensure effective code enforcement and policing programs.
- Policy S.2.C. Provide public safety facilities at multiple locations to facilitate prompt response times.

- Policy S.2.D. Increase public access to police services.
  - Action S.2.D.1. Use foot and bicycle patrols to increase community policing.
  - Action S.2.D.2. Promote establishment and/or expansion of neighborhood watch programs for residential areas.
  - Action S.2.D.3. Continue enforcement of the California Motor Vehicle Code, local speed controls, and chain controls.
  - Action S.2.D.4. Reduce criminal behavior in the community by involving the community and coordinating with other agencies.

The PRMP, in itself, is not expected to generate a demand for police services significantly greater than that anticipated under the growth policies of the General Plan. Although service demand may increase, the incremental increase in Police Department workload as a result of the PRMP, in itself, is not expected to result in the need for new or physically altered police facilities over that already anticipated under the buildout of the General Plan. Therefore, impacts to police services would be less than significant and no further mitigation would be required.

c. Schools.

Less Than Significant Impact. Increased demand for school services is based on population growth. As discussed under Response No. XIII (a), above, the PRMP would serve the Town's existing population and the growth in population already anticipated under the General Plan, but would not induce substantial direct or indirect population growth in itself. Because the PRMP would not directly or indirectly induce population growth, it would not increase demand for school facilities or services. The PRMP would not result in the need to construct new school facilities and impacts on school services would be less than significant.

d. Parks.

Less Than Significant Impact. The growth in parks and recreational facilities under the PRMP is based on the need to meet current and future demand, which is a factor of existing and anticipated future population of the Town of Mammoth Lakes. As discussed under Response No. XIII (a), above, the PRMP would serve the Town's existing population and the growth in population already anticipated under the General Plan, but would not induce substantial direct or indirect population growth in itself. In addition, the intention of the PRMP is to provide parks and, therefore, would not cause an increase in demand. While overall park use may increase due to improved access, the anticipated increase would not be substantial enough to result in the need for new parks not identified in the PRMP. Because the PRMP is not expected to result in a demand for additional parks, physical impacts due to the provision of new or physically altered parks facilities (not addressed by the PRMP) would be less than significant.

e. Other governmental services (including roads).

Less Than Significant Impact. The demand for additional government services, such as roads, is based on maintaining service levels (LOS) to meet current and future demand. Future demand is a factor of existing and anticipated future population of the Town of Mammoth Lakes. As discussed under Response No. XIII (a) above, and Response No. XVI, below, the PRMP would serve the Town's existing population and the growth in population already anticipated under the General Plan, but would not induce substantial direct or indirect population growth in itself or increase in traffic over that not already anticipated under the General Plan buildout. The network of streets serving the Town of Mammoth Lakes would be based on community-wide

growth and would not be a direct or indirect effect of the PRMP. Because the PRMP would not directly or indirectly induce population growth or cause the development of new streets or street improvements, it would not cause the demand for new roads or other governmental over the demand anticipated under the General Plan. Therefore, impacts on other governmental services would be less than significant.

XV. RECREATION

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. As described under Response No. XIV (d), above, the growth in parks and recreational facilities under the PRMP is based on the need to meet current and future demand, which is a factor of existing and anticipated future population of the Town of Mammoth Lakes. The intention of the PRMP is to provide parks and recreational facilities to ease existing and future demand and, therefore, reduce potential physical deterioration of existing facilities. Impacts to existing parks and recreational facilities would be less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact With Mitigation Incorporated. The expansion of existing recreational facilities and the construction new recreational facilities have the potential to generate potentially significant aesthetic, air quality, biological resources, cultural resources, noise, fire hazard, construction traffic and other physical impacts addressed in this Initial Study. Mitigation measures have been required for each of the identified potentially significant impacts (see Subsections I, *Aesthetics*; III, *Air Quality*; IV, *Biological Resources*; V, *Cultural Resources*; IV, *Geology and Soils*; VIII, *Hazards;* IX, *Hydrology and Water Quality*; XII, *Noise*; and XVII. *Utilities and Service Systems*). With the implementation of proposed mitigation measures, potentially significant impacts resulting from the construction of recreational facilities would be reduced to less than significant levels.

XVI. TRANSPORTATION/TRAFFIC

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. The intent of the Town of Mammoth Lakes 2007 General Plan Mobility Element, is to achieve a progressive and integrated multi-modal transportation system that serves the various needs of residents, employees and visitors. With respect to recreation, it is expected that mobility will be improved through such measures as increasing and improving available transportation options, land use planning that reinforces feet first and improves mobility, and connecting sidewalks and trails to transit,

parking facilities, and parks year-round to provide a better experience. Mobility goals and policies that would be most applicable to recreation include the following:

- Mobility Element GOAL M.1. Develop and implement a town-wide, way-finding system.
- Mobility Element GOAL M.2. Improve regional transportation system.
    - Policy M.2.A. Maintain and expand access to recreation areas via coordinated system of shuttle and bus services, scenic routes, trails and highways.
- Mobility Element GOAL M.3. Emphasize feet first, public transportation second, and car last in planning the community transportation system while still meeting Level of Service standards.
    - Policy M.3.A. Maintain a Level of Service D or better on the Peak Design Day at intersections along arterial and collector roads.
    - Policy M.3.B. Reduce automobile trips by promoting and facilitating:
        - Walking
        - Bicycling
        - Local and regional transit
        - Innovative parking management
        - Gondolas and trams
        - Cross-country skiing and snowshoeing
    - Policy M.3.F. Encourage the school district, ski resort and other major public and private traffic generators to develop and implement measures to change travel behavior.
    - Policy M.3.G. Construction activities shall be planned, scheduled and conducted to minimize the severity and duration of traffic impediments.
- Mobility Element GOAL M.4. Encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive.
    - Policy M.4.A. Improve safety of sidewalks, trails and streets.
    - Policy M.4.B. Provide a high quality pedestrian system linked throughout the community with year round access.
    - Policy M.4.D. Provide safe travel for pedestrians to schools and parks.
        - Action M.4.D.1. Update trail, streetscape and roadway design standards as well as the Circulation, Trail System and General Bikeway Plans to establish a system of bicycle routes and pedestrian trails for recreation, commuting and shopping that is comprehensive and safe.
- Mobility Element GOAL M.5. Provide a year-round local public transit system that is convenient and efficient.
    - Policy M.5.A. Expand and increase reliability of transit service to meet the needs of the community and visitors.
- Mobility Element GOAL M.6. Encourage alternative transportation and improve pedestrian mobility by developing a comprehensive parking management strategy.

- Policy M.6.A. Develop efficient and flexible parking strategies to reduce the amount of land devoted to parking.

- Mobility Element GOAL M.7. Maintain and improve safe and efficient movement of people, traffic, and goods in a manner consistent with the feet first initiative.

A component of the PRMP's vision is to promote connectivity within and beyond the Town (PRMP, page 4) and sets for the following goals applicable to the Mobility Element:

- PRMP Goal 3. Create a Master Plan for an integrated trail system that will maintain and enhance convenient public access to public lands from town
- PRMP Goal 4. Provide and encourage a wide variety of outdoor and indoor recreation readily accessible to residents and visitors of all ages.
- PRMP Goal 5. Link parks and open space with a well-designed year-round network of public corridors and trails within and surrounding Mammoth Lakes.

It is anticipated that the goals of the PRMP would result in a network of trails and improved recreational facilities that would be more accessible to the Town's residents and visitors. The PRMP would also potentially result in greater use of transit and other alternative transportation in keeping with the objectives of the Mobility Element. The PRMP allows for the implementation of the Mobility Element's "feet first" goals, which are intended to help maintain a Level of Service D or better at arterial and collector road intersections. As represented in Policy M.3.A ("Maintain a Level of Service D or better on the Peak Design Day at intersections along arterial and collector roads"), the General Plan establishes the level of effectiveness for traffic circulation at arterial and street intersections. The PRMP is intended to serve the needs of the existing Town and the Town under future growth anticipated under the General Plan and would not generate appreciable new traffic in the Town. Therefore, it is not expected that the PRMP would cause the Level of Service D to be exceeded. Because the PRMP would support the goals of the Mobility Element, impacts with respect to plan consistency would be less than significant.

b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. As discussed under XVI.a, the Mobility Element of the General Plan establishes a Level of Service D for arterial and collector road intersections. The PRMP does not propose land uses that would increase or materially change the number of residents and visitors to the Town that would measurably increase service levels. Therefore, the PRMP would be consistent with the Mobility Element and would be less than significant with respect to this service standard.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less Than Significant Impact. With the exception of the potential increased use of playing fields at Whitmore Regional Park, or the temporary enclosure of the Whitmore Park swimming pool, potential future projects under the PRMP would not be located within two miles of a public airport or private airstrip. Whitmore Regional Park, which is located approximately 0.5 mile from the eastern end of the Mammoth Yosemite Airport, is within the Mammoth/June Airport Land Use Plan (ALUP) area for the Mammoth

Yosemite Airport). The ALUP is a comprehensive land use plan that defines the type and pattern of future development at the Mammoth Yosemite Airport and in the surrounding areas. It includes specific policies and guidelines intended to protect the safety and general welfare of people in the vicinity of the airport and to ensure the safety of air navigation. The PRMP would not exceed the height standards (45 feet) for the ALUP area and would not result in additional lighting, towers, or other facilities that would change air traffic patterns. Therefore, the PRMP would have a less than significant impact with respect to airport safety risks.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. As discussed under Response No. XVI.a, the PRMP would support the goals of the Mobility Element. Specifically, Mobility Element GOAL M.4. states, "encourage feet first by providing a linked year-round recreational and commuter trail system that is safe and comprehensive." Policy M.4.D. states, "Provide safe travel for pedestrians to schools and parks." Action M.4.D.1 states, "Update trail, streetscape and roadway design standards as well as the Circulation, Trail System and General Bikeway Plans to establish a system of bicycle routes and pedestrian trails for recreation, commuting and shopping that is comprehensive and safe." Improvements under the PRMP would be designed to provide safe access for pedestrian and vehicular travelers in accordance with the goals, policies and action items in the Mobility Element. Additionally, improvements under the PRMP would not involve the construction of any uses that would be considered incompatible with existing roadways. Based on the above, a less than significant impact would occur in this regard.

e. Result in inadequate emergency access?

Less Than Significant Impact. Projects under the PRMP are generally located in areas that would be accessible by foot or vehicle. Site and development plans would be subject to review by the Town and MLFPD to ensure that adequate emergency access to facilities is available, and that new habitable structures are designed in conformance with building and fire code requirements regarding access and emergency ingress and egress. Implementation of PRMP projects is not expected to impede or adversely affect existing or future emergency access, and in some cases may improve it by incorporated new driveways or access roads. Although trails are a component of the PRMP, the environmental impacts and relationship of the trails to emergency access are separately addressed and, where indicated, mitigated in the EIR prepared by the Town for the TSMP and SHARP (see Town of Mammoth Lakes Trails System and Sherwins Area Recreational Plan EIR (2011)).

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. As discussed under Response No. XVI (a), above, the PRMP would be consistent with applicable transit and pedestrian access policies of the Mobility Element of the General Plan. The trails component of the PRMP would provide bicycle and multi-use paths and further implement the objectives of the Mobility Element. The PRMP would support the General Plan's public transit policies and implement the General Plan's bicycle and pedestrian programs and, as such, would not conflict with adopted policies or performance or safety of such facilities. Therefore, the PRMP would have no impact with respect to mobility policies, plans, or programs.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. The PRMP would require the development of some restroom facilities at potential indoor and outdoor facilities. Demand for wastewater services is largely based on an area's resident and visitor population. The PRMP is intended serve the Town's existing population and the growth in population already anticipated under the General Plan and would not, in itself, induce substantial direct or indirect population growth. Increased wastewater treatment demand under the PRMP would be reflected in the population growth projections under the General Plan and, as such, the PRMP would not meaningfully change or substantially increase the wastewater generation anticipated under the General Plan. Therefore, the potential parks and recreational facilities are not expected to generate wastewater volumes that would require the construction of new wastewater treatment facilities or result in unusual wastewater exceeding the wastewater treatment requirements of the Mammoth Community Water District (MCWD) and/or the Lahontan Regional Water Quality Control Board. Compliance with the existing regulations established by the MCWD and/or Lahontan Regional Water Quality Control Board would ensure that impacts regarding wastewater treatment would be less than significant.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed under Response No. IX (b), above, the MCWD provides water to the Town and owns, operates and maintains the sewage collection systems for the Town. The PRMP would require the development of some restroom facilities, but these are not anticipated to generate sufficient wastewater volumes to require the construction of new wastewater treatment facilities. In addition, the Project would not generate a new water demand that would require the construction of new water treatment facilities or expansion of existing treatment facilities.

The PRMP would require treated water for a possible indoor swimming pool, gym, recreation center, and other uses requiring drinking water. The MCWD's 2005 Urban Water Management Plan (UWMP) anticipates an increase in demand for water for public sector uses (which is combined with commercial and industrial growth) from approximately 374 acre feet annually in 2010 to approximately 660 acre feet annually in 2025. The PRMP would comprise a small portion of the demand for treated water at General Plan build-out and demand is anticipated to occur within the anticipated growth parameters (660 acre feet by 2025). The PRMP would not result in a significant increase in demand that would, in itself, require the construction of additional treatment facilities.

Minor infrastructure improvements may be required to provide connections from the existing water and wastewater services to some new facilities. These minor improvements would not have the potential to cause significant environmental impacts. Therefore, the PRMP would have a less than significant impact with respect to the water and wastewater treatment facilities, the construction of which could result in significant environmental effects.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact With Mitigation Incorporated. As discussed under Response No. IX(b), above, many of the PRMP's park and recreational facilities are largely open space in character and would maintain overall permeability of the sites, groundwater volumes or recharge would not be significantly affected to the extent that a net deficit in aquifer volume or local groundwater table would occur. However, certain potential recreational facilities, such as the indoor swimming pool, the skating rink, tennis courts, and a recreational/cultural center would reduce the overall permeability of the development sites and increase storm water runoff. **Mitigation Measure HYD-2**, under Response No. IX (b), requires that construction projects resulting in a net decrease of on-site permeability provide collection, retention, and infiltration facilities to prevent transport of the runoff in a 20-year, 1-hour design storm. The implementation of this mitigation measure would reduce impacts on the area's drainage system and the PRMP, in itself, would not require the development of new drainage systems, the construction of which would result in potentially significant impacts. Therefore, the PRMP would have a less than significant impact with respect to existing drainage systems.

Mitigation Measures

Refer to **Mitigation Measure HYD-2**. No additional mitigation measures are necessary.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact with Mitigation Incorporated. The MCWD provides water to the Town and to some recreational uses within USFS lands. Water supplies derive from surface water diverted from the Mammoth Creek watershed and eight ground water production wells within the Town. Surface water supplies are immediately affected following a drought season and groundwater supplies tend to be affected by an extended drought period of several years. The total annual diversion from Lake Mary may not be available during periods of drought. Based on an analysis of projected future water demand data and current supply reliability data, the MCWD has concluded that the third and fourth years of multiple dry years would result in a supply deficiency as the town nears build-out. A single extreme dry year would also result in a supply deficiency. The MCWD has identified means of reducing the impact from drought years including the following:

- Reducing demand through water restrictions, primarily restrictions on irrigation;
- Use of recycled water;
- Decreasing the percentage of water losses in the system; and
- Developing new groundwater sources in the Dry Creek and Mammoth Basin watersheds

The MCWD's 2005 Urban Water Management Plan (UWMP), anticipates an increase in demand from 6,760 acre feet annually to 8,120 acre feet annually to accommodate anticipated demand under the buildout of the General Plan. The Final EIR for the General Plan determined that, even with this increase, a deficit of 488 acre-feet would occur in a single dry water year. However, the Final EIR also determined that, with the increase in future water supplies under the 2005 UWMP and the implementation of the District's mandatory conservation measures and water shortage contingency plan, the projected water demand associated with

the buildout of the General Plan would not exceed the water supply. To mitigate any potential shortfall, Goal 4 of the General Plan is to conserve and enhance the quality and quantity of Mammoth Lakes' water resources. Policies applicable to water demand and conservation include the following:

- Policy R.4.A. The Town shall work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established prior to development approvals.
- Policy R.4.B. Support and encourage water conservation and recycled water use within private and public developments.
- Policy R.4.C. Require drought-tolerant landscaping and water-efficient irrigation practices for all development and Town-maintained landscaped areas, parks and park improvement projects. Development design, including parks, may include limited turf as appropriate to the intended use.

According to the MCWD, additional water to serve population growth could be acquired from recycled water and a potential future well (if needed). Recycled water could also replace current uses of treated, potable water for landscaping and other non-potable needs, as would installation of artificial turf in place of live turf. With the implementation of conservation measures required by the MCWD and the applicable General Plan policies (phasing of development according to water availability), it is expected that the PRMP would not exceed resources or cause the Town to seek additional entitlements. Nonetheless, to ensure that potentially significant impacts with respect to water supply are less than significant, **Mitigation Measure Water-1** is prescribed below.

Mitigation Measures

WATER-1 Parks-related projects with the potential to increase water demand beyond existing conditions or that will create a new water demand, shall implement water conservation measures that will be developed in consultation with the Mammoth Community Water District (MCWD). Water conservation measures may include, but are not limited to, the following:

- Water efficient landscaping;
  - Weather-based irrigation controller with rain shutoff;
  - Native drought tolerant plants;
  - Matched precipitation (flow) rates for sprinkler heads;
  - Drip/microspray/subsurface irrigation where appropriate;
  - Proper hydro-zoning;
  - Live turf avoidance or minimization (artificial turf in place of live turf) when feasible;
  - Where live turf is used, irrigation shall be designed to reflect maximum water efficiency by a qualified landscape architect, civil engineer or certified irrigation designer.
  - Use of landscape contouring to minimize precipitation runoff; and

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department Public Works.

- Low flow fixtures;
- Use of recycled water; and
- High efficiency toilets and urinals.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The PRMP implementation would not meaningfully change or substantially increase the number of visitors or residents in the Town that generate wastewater. Accordingly, the Project would not generate wastewater volumes that would require the construction of new or expansion of existing wastewater treatment facilities. Impacts with respect to wastewater treatment capacity would be less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. The development of potential future parks and recreational facilities has the potential to increase solid waste output, including office waste, paper towels from restrooms, general waste from human activity (such as picnic debris), and other items. However, any future parks and recreational facilities would not, of themselves, be primary generators of solid waste. The primary disposal site serving the Town is the Benton Crossing Landfill, owned and operated by Mono County. The landfill has remaining capacity and is projected to remain open until 2023. However, Mono County issued a statement in August 2010 that gate fees have dropped because of the reduced waste stream during the recent economic downturn[19] Slower growth in the area than projected and respective reductions in waste stream would potentially prolong the landfill's estimated closing date. The Town also has an option for five years at the Pumice Valley Landfill. The Town is expanding its recycling capabilities to achieve the state mandated 50 percent diversion rate, which may also result in waste stream reductions. The Town also has an option for five years at the Pumice Valley Landfill.

The General Plan incorporates implementation measures for various recycling programs affecting all types of waste and waste sources. The intention of General Plan Goal R.9 is to reduce the volume of solid waste in order to reduce the impact of solid waste on the Town's disposal capacity. Policies and actions that would support this goal are the following:

- Policy R.9.A. Support programs to recycle materials such as paper, cardboard, glass, metal, plastics, motor oil; and programs to compost or chip for mulch tree cuttings, brush, and other vegetation.
  - Action R.9.A.1. Develop programs to maximize recycling of waste products generated by the community to prolong useful life of the landfill.

[19] *Matt Carter, Solid Waste Supervisor, Mono County Department of Public Works (August 17, 2010).*

- Action R.9.A.2. Require effective and efficient recycling programs throughout the community.
- Action R.9.A.3. Provide recycling containers throughout the community.

The potential parks and recreational facilities under the PRMP would be required to comply with all recycling policies and actions. With the implementation of recycling measures required by the applicable General Plan policies, it is expected that the PRMP would not exceed disposal resources. Therefore, impacts with respect to solid waste disposal would be less than significant

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. The California Integrated Waste Management Act of 1989 mandates a 50 percent diversion from landfills. The Town is expanding its recycling capabilities to achieve this diversion rate, as reflected in General Plan Goal R.9. Recycling efforts include coordination with the Sierra Conservation Project to provide recycling facilities in public areas (shopping malls), offices, restaurants and bars (including staff training). The Town of Mammoth Lakes is also working with the Sierra Conservation Project to assist new resort developments in implementing recycling programs to reduce environmental impacts. The aim of the project is to provide convenient recycling opportunities within the common areas and rental complexes, as well as the restaurants, bars, corporate business and offices that will accompany new resort developments, which may also result in waste stream reductions. The potential parks and recreational facilities under the PRMP would be required to comply with the Town's recycling policies and actions. The Resource Conservation and Recovery Act (RCRA) mandates that federal employees follow specific guidelines recycling. Executive Order 13101 is directed toward establishing and maintaining recycling and recovery programs. Where applicable, the USFS would be required to implement federal recycling programs for the PRMP's trail components located on USFS lands. Because the Town and USFS would comply with applicable federal, state, and local statutes related to solid waste recycling, impacts with respect to these regulations would be less than significant.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. The preceding analysis reveals a range of environmental impacts that could have potentially significant environmental consequences. However, all potentially significant impacts could be mitigated to less than significant levels with the implementation of recommended mitigation measures cited above. Biological resources and cultural resources are discussed in Subsections IV, *Biological Resources*, and Subsection V, *Cultural Resources*, above. As described under Subsection IV, the various components of the PRMP include open space areas and wetlands that may support a variety of rare or endangered plant or animal species. With the enforcement of mitigation measures set forth under that subsection, the potential buildout of the PRMP would not cause substantial reductions in the habitat of fish or wildlife species, cause reductions of fish or wildlife population to below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce or restrict the number or range of a rare or endangered plant or animal communities. With respect to cultural resources, the PRMP also includes areas containing historical and archaeological resources that could be impacted by potential development of

the PRMP's recreational trails components. Mitigation measures described under the Cultural *Resources* subsection, above, would reduce potentially significant impacts on such resources to less than significant levels.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact With Mitigation Incorporated. The PRMP is a programmatic master plan that identifies the area's potential parks and recreational improvements up to Year 2025. The PRMP envisions a broad scope of conceivable future projects and, as such, is comprehensive and cumulative in nature. Most of the proposed recreational projects are small in scale and would be gradually developed over the course of several years. Depending on funding and other approvals, many of the listed projects may not be implemented. With the implementation of recommended mitigation measures, the gradual development of the PRMP's potential recreational projects over the next approximately 15 years combined with related (other) development projects that may occur in the Town of Mammoth Lakes during the same time period, are not expected to result in significant cumulative impacts. With respect to impacts that were not identified as potentially significant or mitigated (such as agricultural resources, population, housing, police protection, schools, solid waste disposal, etc.) the effects of PRMP projects combined with related projects are not expected to be cumulatively significant.

c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact With Mitigation Incorporated. The evaluation of checklist issues, above, identifies potentially significant impacts associated with the following:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards (airport proximity and wildland fires)
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services (fire protection)
- Recreation
- Utilities and Service Systems (Water)

As discussed, herein, these impacts would be reduced to less than significant levels through the implementation of recommended mitigation measures. Because all potentially significant impacts would be

reduced to less than significant levels through the implementation and enforcement of the proposed mitigation measures, the PRMP would not have environmental effects that would cause substantial direct or indirect adverse effects on human beings.

REFERENCES

California Environmental Protection Agency official website. Cortese List: Section 65962.5(a). http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm (accessed May 20, 2011)

California Geological Survey official website: Alquist-Priolo Fault Zones. http://www.ca.gov.cgs/rehm/ap/Pages/index.aspx (accessed May 18, 2011).

Inyo National Forest Land Resources Management Plan (1986)

Town of Mammoth Lakes Drainage System Master Plan (2005)

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