
7.0 ALTERNATIVES TO THE PROJECT

7.1 INTRODUCTION

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

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

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

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

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

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

Beyond these factors, CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

For each of the alternatives, the analysis includes the following:

- A description of the alternative;
- A discussion of the impacts of the alternative and evaluation of the significance of those impacts; and
- An evaluation of the alternative relative to the proposed project, specifically addressing project objectives, feasibility, the elimination or reduction of impacts, and comparative merits.

The following alternatives were selected:

- No Project Alternative;
- Workforce/Affordable Housing Alternative; and
- Reduced Development Alternative.

Under the No Project Alternative, the Updated Plan would not be adopted. Therefore, future development would occur under the existing (1987) General Plan. The Workforce/Affordable Housing Alternative would expand affordable and workforce housing development. The Reduced Development Alternative preserves more open space than the project and emphasizes a reduction in the overall development, whereby anticipated population would be approximately 15 percent less than the project.

7.2 ALTERNATIVES CONSIDERED BUT REJECTED

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

The Advocates for Mammoth proposed an alternative to be evaluated in the PEIR in its comment letter in September. The proposal was for an Updated General Plan with Land Use Designations, objectives, goals, polices and implementation measures which result in a projected PAOT of 45,000. This proposed alternative was considered but finally rejected for full evaluation in this PEIR for several reasons.

First, the projected PAOT for existing developments in the Town combined with development projects that have been approved and have vested rights (including developments

under construction or vested with a Development Agreement) is 42,500. In order to limit PAOT at 45,000, additional density of development (except for an increment of units that would yield approximately 2,500 persons, which number is estimated to be 720 units) would need to be severely reduced across nearly all other properties in the Town, including large areas of the Town previously designated for development. These areas include the Bell Parcel, the College area, the Commercial District, the North Village properties that are not subject to a Development Agreement, and both High Density Residential Designations. These areas constitute a relatively large portion of total acreage of the Town and the Town's ability to severely down-zone all or most of the property in these areas, would be contrary to established economic expectations of the property owners and would be subject to significant statutory and constitutional limitations and restrictions. Second, under this alternative, the Town is not likely to achieve the objectives of adopted Specific and Master Plans for some of those areas or achieve the existing and proposed Vision Statements which form the guiding principles of the Updated General Plan. The ability of the Town to meet its stated goal of stabilizing and strengthening its economy by providing new development types and amenities to encourage mid-week visitation would also be severely compromised as those development opportunities would not be available.

Third, this alternative would make it infeasible for the Town to meet either its fair share of the regional housing needs as identified in the Regional Housing Needs Allocation from the Department of Housing and Community Development or its projected workforce housing need, due to a lack of suitable sites.

7.3 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

7.3.1 Description

In accordance with the CEQA Guidelines, “the no project analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”⁷⁶ The Guidelines continue to state that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”⁷⁷

As stated earlier, under the No Project Alternative, the Updated Plan would not be adopted. Therefore, development would occur under the existing (1987) General Plan, as amended. With the exception of state-mandated affordable housing density bonuses, the No Project Alternative would retain the existing General Plan in its current form, including all of its

⁷⁶ *State of California, CEQA Guidelines § 15126.6(e)(2), amended December 1, 2003.*

⁷⁷ *State of California, CEQA Guidelines § 15126.6(e)(3)(B), amended December 1, 2003.*

land use designations, policies and plans for the future development of Mammoth Lakes. Table 7-1 on page 7-5 provides a comparison between the existing conditions, development buildout under the 1987 General Plan as amended, development buildout under the proposed project, and the incremental changes in units and square footage of development and population between the 1987 General Plan and the project.

In terms of land uses and land use pattern, Figure 7-1 on page 7-6 shows the locations of the various land uses under the No Project Alternative. The land use pattern and distribution of land uses in the No Project Alternative would be similar to the land use pattern under the project. The UGB in the No Project Alternative and the project would remain the same. Table 7-2 on page 7-7 provides a comparison of the acres within each land use designation for the No Project Alternative and the project.

The No Project Alternative has fewer land use designations compared with the project. In other words, the categories of land uses would be more general under the No Project Alternative. In the existing General Plan the Gateway district is designated Specific Plan while under the project the Gateway district would be subject to specific designations. Moreover, the existing General Plan has no land use designation for Industrial (I) activities, nor does it incorporate a designation for National Forest Service parcels (NF), both of which are provided in the project.

As can be seen in Table 7-1, the No Project Alternative would result in a total of 17,396 residential (non-transient and transient) units compared with ~~16,710~~^{17,020} units under the project. The No Project Alternative would result in 686 units more than the project. The No Project Alternative would result in 85,000 square feet less of commercial/office floor area and 154,233 square feet less of industrial floor area compared with the project.

Table 7-3 on page 7-8 provides a comparison of the land use categories under the No Project Alternative and the project. The following provides a description of the land use categories under the No Project Alternative:

Residential. The LDR category applies to single-family residential development of three to five dwelling units per gross acre. This density range is typical of residential subdivisions in Mammoth Slopes and Mammoth Knolls. The Special Conservation Planning (SCP) designation is an overlay on portions of the LDR designation, which are zoned as rural residential (RR), within the Old Mammoth area near Mammoth Creek and the Bluffs. Areas are designated as SCP due to sensitive environmental features including streams, riparian vegetation, and visual sensitivity.

Table 7-1

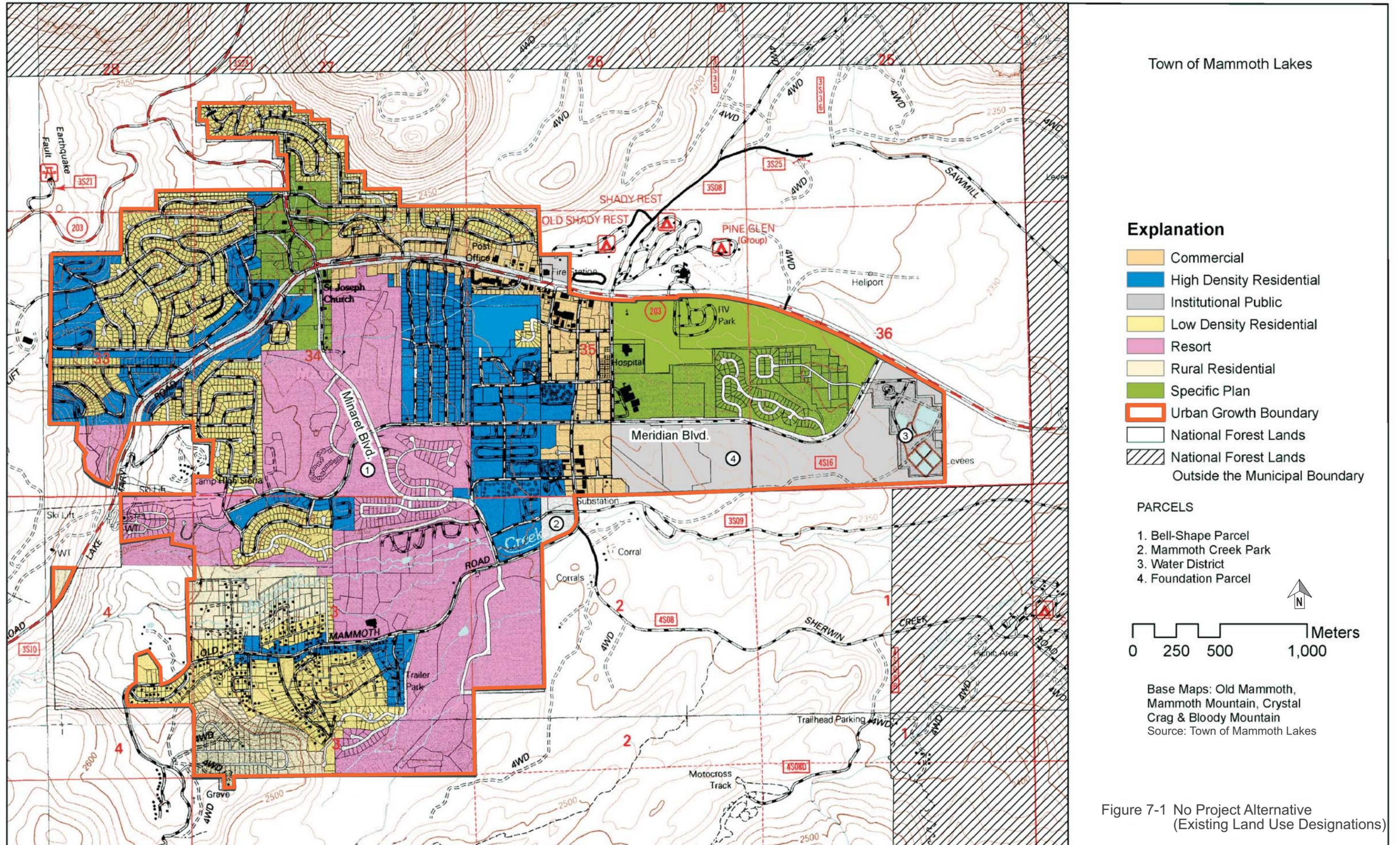
Incremental Development for Buildout of the Proposed Project Compared with the Existing General Plan

<u>Land Use</u>	<u>January 2004 Existing Development</u>	<u>1987 General Plan Build Out</u>	<u>Project Build Out</u>	<u>Incremental Change Between 1987 General Plan and Project</u>
Single Family Non-transient	2,087 units/409 acres	2,400 units/576 acres	2,380 units/576 acres	-20 units/0 acres
Single Family Transient	0 acres	97 units/24 acres	97 units/24 acres	0 units/0 acres
Mobile Home	136 units/15 acres	144 units/16 acres	144 units/16 acres	0 units/0 acres
Multi-Unit Non-Transient	827 units/60 acres	2,077 units/99 acres	2,091 units/119 acres	14 units/20 acres
Multi-Unit Transient	6,821 units/402 acres	12,678 units/559 acres	11,998 units/559 acres	-680 units/0 acres
Industrial	296,941 sq. ft./36 acres	339,314 sq. ft./44 acres	493,547 sq. ft./64 acres	154,233 sq. ft./20 acres
Commercial/Office Uses	1,262,618 sq. ft./58 acres	1,280,002 sq. ft./84.5 acres	1,365,002 sq. ft./84.5 acres	85,000 sq. ft./0 acres
Total Units	40,06 <u>39,871</u>	17,396	17,020 <u>16,710</u>	
Population (persons)	34,265	61,376	60,680	

Source: Town of Mammoth Lakes, 2005

The HDR designation is intended for multi-family development at a maximum density of six to 12 dwelling units per acre. These densities would accommodate attached homes, two- to four-plexes, and condominium and apartment buildings. There are two districts within the HDR designation: one allows for visitor accommodations and the other prohibits transient (nightly visitor) rentals.

Residential – Project (Updated Plan). The Updated Plan retains the same residential designations as the current General Plan but provides two LDR and two HDR designations rather than one. The Low Density Residential 1 (LDR-1) allows single-family detached residential development at a maximum of two units per gross acre. The Low Density Residential 2 (LDR-2) allows single-family detached residential development of up to four units per gross acre. The High-Density Residential 1 (HDR-1) allows development of resident-oriented multi-unit housing at a density of 10 units per acre. The High-Density Residential 2 (HDR-2) allows visitor-oriented multi-unit development at 10 units per acre. The provision of more categories for residential uses enables the Town to provide greater specificity and to more accurately identify the desired uses within each designated area.



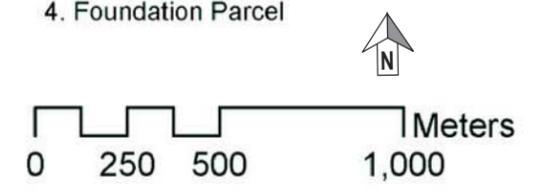
Town of Mammoth Lakes

Explanation

- Commercial
- High Density Residential
- Institutional Public
- Low Density Residential
- Resort
- Rural Residential
- Specific Plan
- Urban Growth Boundary
- National Forest Lands
- National Forest Lands Outside the Municipal Boundary

PARCELS

1. Bell-Shape Parcel
2. Mammoth Creek Park
3. Water District
4. Foundation Parcel



Base Maps: Old Mammoth, Mammoth Mountain, Crystal Crag & Bloody Mountain
 Source: Town of Mammoth Lakes

Figure 7-1 No Project Alternative (Existing Land Use Designations)

Table 7-2

Comparison of Project and Alternatives With Regard to Acres within each Land Use Designation

Land Use Designation	Project	No Project Alternative	Workforce/ Affordable Housing Alternative	Reduced Development Alternative
C1	42	130	44	44
C2	87		85	85
HDR1	132	375	120	104
HDR2	260		272	277
I	67		67	31
IP	333	209	333	153
LDR1	210	596	210	205
LDR2	391		391	391
OS	343		343	575
R	580	602	580	580
Rights-of-way	393	392	393	392
SP	54	271	54	54
Total Acres	2,892	2,575	2,891	2,890

Notes: The total acreage within the UGB is approximately 2,890 acres. The UGB is the same under the project and the three alternatives. The acreage numbers in the No Project Alternative do not equal 2,890 since open space areas are not currently designated as such and therefore, were not included in the GIS database. In addition, rights of way were not included within the land use acreages.

Source: Town of Mammoth Lakes, 2005

Commercial, Industrial and Resort Uses

Commercial. The Commercial (C) designation allows for retail, lodging, and general commercial activities including offices. It includes two types of commercial areas: resident oriented retail/service commercial areas and specialized visitor oriented commercial areas. Maximum density for lodging is 40 guest rooms per acre and an increase to a maximum of 80 guest rooms per acre with 100 percent understructure parking.

Commercial – Project (Updated Plan). The Updated Plan retains the same commercial and resort designations but provides two C designations rather than one. This enables the Town to provide greater specificity and to more accurately identify the desired uses in commercial areas. The Commercial 1 (C-1) designation allows for small-scale commercial services for residents and visitors as well as visitor lodging. The designation would be located along Main Street between North Village and Mono Street. The C-1 designation is intended to create a transition between the intensive retail commercial at the eastern end of Main Street and the resort

Table 7-3

**Comparison of Existing Land Use Designations
with Land Use Designations for Proposed Project and Alternatives**

Designation Type	Proposed Project	No Project Alternative	Workforce/Affordable Housing Alternative	Reduced Development Alternative
Residential	LDR-1 Low-Density Residential (2 units/acre)	LDR Low-Density Residential (3-5 units/acre)	LDR-1 Low-Density Residential (2 units/acre)	LDR-1 Low-Density Residential (2 units/acre)
	LDR-2 Low-Density Residential (4 units/acre)	SCP Special Conservation Planning (2 units/acre)	LDR-2 Low-Density Residential (4 units/acre)	LDR-2 Low-Density Residential (4 units/acre)
	HDR-1 High-Density Residential (10 units/acre)	HDR High-Density Residential (6-12 units/acre)	HDR-1 High-Density Residential (12 units/acre)	HDR-1 High-Density Residential (10 units/acre)
	HDR-2 High-Density Residential (10 units/acre)		HDR-2 High-Density Residential (12 units/acre)	HDR-2 High-Density Residential (10 units/acre)
	R Resort	R Resort	R Resort	R Resort
	Commercial	C-1 Commercial (20 units/acre)	C Commercial (40 guest rooms/acre, 12 units/acre)	C-1 Commercial (12 units/acre)
	C-2 Commercial (20 units/acre)		C-2 Commercial (12 units/acre)	C-2 Commercial (10 units/acre)
Specific Plan, Institutional/Public	NVSP, IP North Village Specific Plan, Institutional/Public	SP, IP Specific Plan Institutional/Public	NVSP, IP North Village Specific Plan, Institutional/Public	NVSP, IP North Village Specific Plan, Institutional/Public
Open Space	OS Open Space	OS Open Space	OS Open Space	OS Open Space
Industrial	I Industrial	N/A	I Industrial	I Industrial
Airport	A Airport	N/A	A Airport	A Airport
National Forest	NF National Forest	N/A	NF National Forest	NF National Forest

Source: Town of Mammoth Lakes, 2005

commercial of North Village. Density of 20 units⁷⁸ per acre is permitted, which may be increased up to double for development that provides additional community benefits.

The Commercial 2 (C-2) designation would allow areas for commercial services and sales of goods. The C-2 designation is intended to promote pedestrian uses, reduce vehicular conflicts, and improve the visual appearance of street frontages. Multi-unit housing is encouraged as an accessory use. Density of 20 units per acre is permitted and may be increased up to double for development that provides additional community benefits.

Industrial. Under this alternative the SP designation is applied to two districts within the Town: the Gateway District and the North Village. The Gateway District designates sites for schools, industrial uses, 100 single-family lots, a hospital, and related uses. There is no specific Industrial designation.

Industrial – Project (Updated Plan). The Updated Plan provides an Industrial (I) designation, which would accommodate industrial uses needed to support a resort community. Uses allowed by right would be those conducted entirely within and enclosed structure and may include light manufacturing, storage and maintenance uses. Other permitted uses may include heavy equipment storage and maintenance, batch plants, automobile repair and service, and similar uses. Additional land under adjacent to the Water District would be designated Industrial.

Resort. The Resort (R) designation includes mixed visitor oriented uses including lodging, visitor oriented commercial, and recreation uses. Maximum densities are eight units per acre.

Resort – Project Updated Plan. The Resort (R) designation includes mixed visitor oriented uses including lodging, visitor oriented commercial, and recreation uses. Maximum densities are eight units per acre for visitor lodging and six units per acre for all other uses.

Open Space, Institutional/Public Facilities, and Specific Plan Area

Open Space. Under this alternative the OS designation is applied to lands that have significant recreational or environmental values including lands administered by the USFS and permits development of facilities that support the environmental and recreational objectives of the community. This alternative specifically assumes development of Sherwin Ski Area or other

⁷⁸ Studio and one-bedroom equal to 1/2 dwelling unit of density.

increase in Alpine skiing of 8,000 skiers at one time in addition to the Mammoth Mountain capacity.

Open Space – Project (Updated Plan). This designation would apply to lands that have significant recreational or environmental values. The OS designation permits development of facilities that support the environmental and recreational objectives of the community. This zone may include environmentally sensitive areas such as wetlands, floodplains, and streams and may include recreation facilities such as parks, athletic fields, golf courses, and community gathering spaces.

Institutional/Public. Under this alternative, the IP designation allows for public facilities and institutional uses and is applied to lands that are anticipated to be used for schools, hospitals, governmental offices and facilities, museums, and related uses. The IP designation also includes the Mammoth Yosemite Airport. Support facilities, which may be permitted at the Airport, include automobile rental, transient lodging, retail uses and a 100 space RV park. The Airport zone is also designated for 250 visitor accommodation units and approximately 30,000 square feet of commercial development.

Institutional Public – Project Updated Plan. This designation allows for public facilities and institutional uses. It is applied to lands that are anticipated to be used for schools, hospitals, governmental offices and facilities, museums, and related uses. As these uses are among the largest employers within the town, affordable or student housing (as defined by the Town) shall be permitted on IP lands located south of Meridian Boulevard and east of Old Mammoth Road. For housing uses, HDR-1 uses and development standards are applicable. A maximum density of up to four units per gross acre is permitted; however, densities may be clustered. Policies encouraging adequate pedestrian and transit facilities are included to promote alternatives to private vehicle access to places of employment, study, shopping and recreation

Specific Plan. Under this alternative the SP designation is applied to two districts within the Town: the Gateway District and the North Village. The Gateway District designates sites for schools, industrial uses, 100 single-family lots, a hospital, and related uses.

The North Village Specific Plan provides for a mix of visitor-oriented commercial and visitor lodging uses. Density in the North Village Specific Plan is calculated in terms of rooms. Commercial development is converted from the residential density at a rate of 450 square feet per room. The maximum density under the North Village Specific Plan is 3,020 rooms and 135,000 square feet of commercial. Density is not uniform but allocated by districts as specified in the North Village Specific Plan.

Specific Plan (North Village) – Project (Updated Plan). The North Village Specific Plan (NVSP) provides for a mix of visitor-oriented commercial and visitor lodging uses. Density

in the North Village Specific Plan is calculated in terms of rooms. Commercial development is converted from the residential density at a rate of 450 square feet per room. The maximum density under the North Village Specific Plan is 3,020 rooms and 135,000 square feet of commercial. Limited density transfers are permitted within the Specific Plan area. Density is not uniform throughout the NVSP, but allocated by districts as specified in the NVSP. Total density within the NVSP area may be increased pursuant to density bonus and density transfer policies or provision of a high level of community amenities and services. The maximum density with increases is 3,800 rooms and 220,000 square feet of commercial. Any increased density must be in projects located within 500 yards of the gondola terminal.

7.3.2 Impact Analysis

7.3.2.1 Aesthetics

Under the No Project Alternative as with the project, growth would occur within the UGB. Intensity of development would be similar under the No Project Alternative compared with the project. As with the project, continued development and redevelopment of land would permanently replace some existing views and scenic vistas with structures. Under the No Project Alternative, less emphasis is provided in the General Plan on aesthetics compared with the project. However, as with the project, all major development projects would undergo environmental and design review on a site-specific basis, per CEQA, the Town's Municipal Code and all applicable regulatory requirements, to ensure that facilities and structures would be sited in a way that would not have substantial adverse effects to scenic vistas and to avoid the loss of scenic resources (such as trees and rock outcrops). In addition, the changes in light and glare would be similar with the No Project Alternative and the project. As with the project, the Town's regulations regarding lighting would reduce impacts. However, as with the project, this Alternative would result in significant and unavoidable lighting impacts to the night sky due to the increase in development compared with existing conditions. With regard to visual character and quality, as with the project, the No Project Alternative would result in a change in the visual character and quality of the community through the development of vacant lands and the redevelopment of other lands. The types and intensity of developments under the No Project Alternative would be similar to the types of development that would occur under the project. As with the project, due to the permanent change in visual character of newly developed areas of the Town, impacts to the Town's visual character and quality are significant and unavoidable.

7.3.2.2 Air Quality

Implementation of the No Project Alternative would result in a similar level of development to that of the Updated Plan. As with the project, the primary sources of emissions would be from mobile sources (tailpipe and roadway dust) and stationary sources, such as wood and pellet burning and consumption of fossil fuels. Due to particulate control measures

(Municipal Code Chapter 8.30), which limit Town-wide VMT, require lower-emitting stones, and establish “No Burn” days, air quality impacts would not are not expected to exceed federal standards or conflict with implementation of the AQMP. Nonetheless, the State 24-hour PM₁₀ and 1-hour O₃ standard would continue to be exceeded, in which pollutant emissions from implementation of the No Project Alternative or the project would continue to contribute to these exceedances of State standards. As with the project, implementation of the No Project Alternative would be considered cumulatively considerable and sensitive receptors could be exposed to substantial pollutant concentrations (PM₁₀ and O₃). However, as with the project, the O₃ impact under the No Project Alternative would be primarily the result of pollution transport from the San Joaquin Valley and is not a condition substantially generated by Town activities. Nonetheless, this air quality impact would be significant and unavoidable.

7.3.2.3 Biological Resources

Compared to the Updated Plan, implementation of the No Project Alternative would result in a similar level of development to that of the Updated Plan. As with the project, impacts to biological resources would increase incrementally with intensified development and human activity. With the level of development expected, direct impacts to candidate, sensitive, or special species, as well as impacts to riparian habitats or other natural communities, would still be less than significant, given federal regulations and Town codes and plans in place to protect such species and habitats. However, as with the project, in the absence of data clearly establishing otherwise, it is conservatively concluded that increased wilderness and open lands usage as may be indirectly caused by the No Project Alternative could have a significant and unavoidable impact upon one or more of the special status wildlife or plants species discussed in Section 4.3 of this EIR.

In addition, federally protected wetlands are regulated by the U.S. Army Corps of Engineers under Section 404 of the CWA, and CDFG recognizes wetlands for their value as high quality habitat for both plants and animals. Both agencies have policies of “no net loss” of wetlands, and additionally, the Town has adopted Federal Emergency Management Agency (FEMA) requirements for setbacks within the floodplain, which would apply to the Mammoth Creek corridor. As with the project, the No Project Alternative would result in less than significant impacts to federally protected wetlands.

Implementation of the No Project Alternative could create barriers to wildlife movement with increased population and human activity. However, given the level of development expected at buildout, this increase would be similar to that of the project. In addition, given existing levels of urbanization within the UGB, the likelihood of disturbing a previously existing wildlife corridor is low. Furthermore, the Town has adopted Municipal Codes to ensure protection and preservation of trees and other biological resources. Therefore, as with the project, impacts to biological resources and tree preservation regarding migratory corridors and

consistency with local policies or ordinances protecting biological resources would be less than significant. In addition, similar to the project, the No Project Alternative would not conflict with the provisions of a habitat conservation plan.

7.3.2.4 Geology

Compared to the Updated Plan, implementation of the No Project Alternative would result in a similar level of development to that of the Updated Plan. The existing General Plan contains goals and policies that address geotechnical hazards similar to the Updated Plan. Under the Updated Plan and this Alternative, future development would be required to comply with the California Building Code as well as Section 12.08.080 of the Town Municipal Code, which requires engineered plans and a soils report to be submitted with an application for a grading permit. Future development under both the Updated Plan and this Alternative would also require detailed recommendations regarding specific techniques and designs to reduce, eliminate or avoid geotechnical hazards and site plan review by the Town to determine conformance with specific recommended geotechnical procedures. Implementation of this Alternative would not result in additional impacts related to development in areas of ground surface rupture due to faulting, seismic shaking, seismically-induced ground deformation, including liquefaction, landslides and slope instability, volcanic eruption, erosion, or expansive soils, when compared to the Updated Plan. Therefore, the No Project Alternative would have similar geology impacts as the Updated Plan.

7.3.2.5 Public Safety and Hazards

Compared to the Updated Plan, implementation of the No Project Alternative would result in a similar level of development to that of the Updated Plan. Under both this Alternative and the Updated Plan, no new impacts would be created regarding wildfires, avalanches, aircraft patterns and airport compatibility, and conflict with the Town's Emergency Operations Plan (EOP). As with the project, given that implementation of measures to reduce the potential impact of wildfires are not under the control of the Town, this potential impact would be significant and unavoidable under the No Project Alternative.

All future development would be required to comply with all applicable regulatory requirements FAA regulations and the requirements of the Mammoth/June Lake Airport Land Use Plan, which would result in less than significant impact regarding compatibility with airport operations. No changes to aircraft patterns would occur under this Alternative or the No Project Alternative. Development under the Updated Plan and this Alternative would not impair implementation or physically interfere with the EOP, because no circulation changes would occur which conflict with the procedures set forth in the plan.

Development in areas with slope gradients of between 30 and 45 degrees could expose people or property to hazards such as avalanches under the Updated Plan or the No Project Alternative. However, areas in the Town where avalanche potential has been identified have been overlaid with a Snow Deposition Design (SDD) Zone to minimize health and safety hazards. Any development within this zone would be permitted by use permit only and requires an Avalanche Risk Assessment certified by a recognized expert in the field of avalanche occurrence. Furthermore, no critical or permanently occupied facilities would be located within a high avalanche hazard area. Thus, impacts regarding avalanches would be less than significant under both the No Project Alternative and the Updated Plan.

With regard to hazardous materials, the use of hazardous materials is generally associated with non-residential uses. The No Project would result in less non-residential development compared with the project. However, as with the project, under the No Project Alternative any use, storage or handling of hazardous materials would be conducted in compliance with applicable federal, state, and local regulations. Therefore, impacts under the No Project Alternative with regard to hazardous materials would be similar to the project and would be less than significant.

7.3.2.6 Hydrology and Water Quality

The No Project Alternative would result in a similar level of development as with the project. Development within the Town under both the No Project Alternative and the project would increase impermeable surface area, resulting in an increase of storm and irrigation water runoff. However, with the development of either the Updated Plan or the No Project Alternative, compliance with federal, state and local water quality and waste discharge requirements, including the NPDES Program and implementation of Best Management Practices (BMPs), would be required for the construction and post-construction phases of development. Under both development scenarios, remediation of undetected contamination and BMPs to reduce the potential pollutants of concern would be implemented. BMPs would also reduce and/or eliminate erosion potential, would be incorporated into development projects. All future development would be subject to the requirements of the Mammoth Lakes Storm Drainage Master Plan (SDMP), which includes guidelines for erosion control and identifies storm drainage facility improvements designed to accommodate development for the Mammoth Lakes area. Additionally, FEMA design standards and guidelines would apply to all development within flood prone areas. Thus, similar impacts would occur regarding flooding.

Overall, future development within the Town under the No Project Alternative, as with the project, would result in less than significant impacts associated with water quality and hydrology. Thus, under the No Project Alternative, impacts to hydrology and water quality would be similar to those of the Updated Plan.

7.3.2.7 Land Use and Planning

The Updated Plan is a comprehensive update of the Town's General Plan, which is the No Project Alternative. Under the No Project Alternative, the Land Use Element would continue to provide outdated information that does not reflect the current conditions in the Town. However, the omission of these clarifications from the existing General Plan would not result in any additional impacts when compared to the Updated Plan. The Updated Plan provides additional categories of land uses. For example, the High Density Residential (HDR) and Low Density Residential (LDR) designations have been divided into HDR 1 and 2 and LDR 1 and 2 in order to provide additional categories and a greater level of detail in the land use designations. The same concept is proposed for the Commercial designation, where a Commercial 1 and 2 are proposed. The overall land use pattern under the No Project Alternative is similar to the land use pattern that exists on the ground and is similar to the project. As with the project, the No Project Alternative would not physically divide an established community nor would the No Project Alternative create incompatible land uses or affect the community character of an established community. The No Project Alternative would not conflict with any applicable plans, policies, or regulations. Land use and planning impacts would be similar under the No Project Alternative compared with the project.

7.3.2.8 Noise

Implementation of the No Project Alternative would result in a similar level of development and associated VMT to that of the Updated Plan. As with the project, impacts related to the 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 would be less than significant. Implementation of the measures provided in the Updated Plan along with measures provided in the Noise Element would ensure that existing and proposed sensitive uses would not exceed applicable noise standards. However, similar to the project, there may nonetheless be a significant unavoidable impact because the noise generated by traffic from implementation of the No Project Alternative would exceed current ambient levels by up to 6 dBA.⁷⁹ As an example, Forest Trail east of Minaret would increase from 48 dB L_{dn} to 54 dB L_{dn}. An L_{dn} of 54 dB is well within the generally acceptable outside noise level provided in the Noise Element of 60 dB L_{dn}, but an increase of 6 dBA would be readily noticeable and, thus, considered a substantial change in noise levels. Therefore, as with the project, the No Project Alternative would result in significant and unavoidable impact with regard to the increase in noise levels from traffic.

⁷⁹ *Community responses to changes in noise levels fluctuate, but a change in noise level from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise, while a 5 dBA increase is readily noticeable.*

7.3.2.9 Population, Housing and Employment

The No Project Alternative would result in a greater number of residential units and less employment (non-residential floor area) compared with the project. The No Project Alternative would result in a slightly higher population at one time at buildout compared with the project. The No Project Alternative would result in a total population of 61,376 PAOT compared with ~~60,680~~ approximately 60,700 under the project, for an increase of approximately 700 people. The No Project Alternative would allow for up to 17,396 dwelling units while the project would allow up to an estimated 16,710 dwelling units.

In terms of non-residential uses, the No Project Alternative would result in approximately 85,000 square feet less of commercial/office square footage and 154,233 square feet less of industrial floor area compared with the project.

As with the project, the No Project Alternative would not provide for the extension or expansion of roadways into the area and would not result in an increase in the capacity of existing infrastructure so as to provide for an increase in population. Similar to the project, the No Project Alternative would accommodate a relatively substantial increment in population growth. However, as with the project, the No Project Alternative would neither directly nor indirectly induce that growth or cause it to occur. Rather, as with the project the Alternative would shape the location, form, and behavior of the growth increment should external demand be sufficient.

7.3.2.10 Public Services

As indicated above, the projected population under the No Project Alternative would be 61,376 PAOT compared to ~~60,680~~ approximately 60,700 PAOT under the project. The No Project Alternative would allow for up to 17,396 dwelling units and the Updated Plan would allow up to an estimated 16,710 dwelling units. The No Project Alternative would have less non-residential square footage. Although there would be less population under the Updated Plan, there would be more commercial and industrial uses under the Updated Plan. As with the project, the demand for police and fire protection, schools, libraries, roadway maintenance and snow removal, and health services associated with the No Project Alternative would increase incrementally with increased population growth. However, as with the Updated Plan project-specific environmental review and payment of the development impact fee would reduce impacts to services to a less than significant level, with the exception of libraries and health services. As with the project, impacts to libraries and health services would remain significant and unavoidable.

7.3.2.11 Public Utilities

The No Project Alternative would result in a population of approximately 61,400 ~~61,376~~ PAOT, which is slightly greater than the population at one time under the project (~~60,680~~ approximately 60,700 PAOT). With regard to water supply, the MCWD prepared a water supply assessment for the project and provided an analysis for the alternatives under consideration. Based on the information provided by MCWD, as shown in Table 7-4 on page 7-18, the No Project Alternative would result in ~~a deficiency of 440 and 482 acre feet of water per year in the two dry and three dry years scenarios, respectively.~~ The deficiency that would result under the No Project Alternative would be greater than that which would occur under the project. Larger deficiencies during single dry year and multiple dry year scenarios than would the proposed General Plan Update. Therefore, similar to the project, the No Project Alternative would result in a significant impact with regard to water supply. The project would include a mitigation measure to ensure that adequate water supply would be available prior to future development. However, no such measure currently exists. Therefore, since the No Project Alternative would result in a greater population buildout and since no mechanism is in place to ensure water supply availability prior to development, the No Project would result in a significant and unavoidable impact with regard to water supply.

The population increase and structural development associated with the Updated Plan and the No Project Alternative would increase the quantity of wastewater generated and associated requirements for collection, treatment and disposal. The existing treatment facility has a capacity for 4.9 mgd. Sufficient capacity exists to accommodate the buildout projected under the project. The No Project Alternative would have an increase of approximately 700 people at one time but would have approximately 239,200 square feet more non-residential development than the project. The capacity of the wastewater treatment would be sufficient to accommodate the projected growth under the No Project Alternative.⁸⁰ Therefore, as with the project, the No Project Alternative would result in a less than significant impact with regard to wastewater.

With regard to solid waste, adequate capacity exists to accommodate growth projected under the project. The difference in the quantity of solid waste generated by the No Project Alternative would not significantly impact capacity. In addition, the Town is expanding its recycling capabilities to achieve the state mandated 50 percent diversion rate, which will reduce the amount of solid waste disposed of at local landfills.

⁸⁰ Letter from Gary Sisson, MCWD, dated April 26, 2005 in response to the previous Draft EIR on the 2005 General Plan Update.

Table 7-4

Comparison of Water Supply and Demand between the No Project Alternative and the Project for Normal, Single Dry Year and Multiple Dry Years

Current Supply & Demand	Normal Year	Single Dry Year	Multiple Dry Years			
			Year 1	Year 2	Year 3	Year 4
Supply Total	6,760	3,410	<u>5,190</u>	<u>4,908</u>	<u>4,508</u>	<u>4,492</u>
Demand Total Including Project	<u>4,898</u>	<u>4,898</u>	<u>4,898</u>	<u>4,898</u>	<u>4,898</u>	<u>4,898</u>
Surplus or (Deficiency)	<u>1,862</u>	<u>(1,488)</u>	<u>292</u>	<u>10</u>	<u>(390)</u>	<u>(406)</u>
<u>Supply Total</u>	<u>6,760</u>	<u>3,410</u>	<u>5,190</u>	<u>4,908</u>	<u>4,508</u>	<u>4,492</u>
Demand Total Including No Project Alternative	4,974	4,974	<u>4,974</u>	4,974	4,974	<u>4,974</u>
Surplus or (Deficiency)	1,786	<u>(1,564)</u>	<u>216</u>	<u>(66)</u>	<u>(466)</u>	<u>(482)</u>

Source: MCWD, 2005

7.3.2.12 Recreation

The No Project Alternative would increase demands for, as well as demands upon, recreational facilities and areas, necessitating construction of additional facilities in order to

maintain adequate service levels and to prevent overuse and the resultant physical deterioration of existing facilities. With regard to Mammoth Creek Park, under the No Project Alternative the park would retain its current designation and would not be redesignated to IP. Therefore, the impact with regard to the potential loss of a park that would occur under the project would not occur under the No Project Alternative. The No Project Alternative would result in a slightly greater resident population in the Town. Based on the ratio of 5 acres per 1,000 persons, this Alternative would require a similar amount of park land as the project (approximately 75 acres). As with the project, the increase in demand on existing facilities as well as the unknown locations for additional park acreage, the impacts to recreation would be significant and unavoidable.

7.3.2.13 Transportation and Circulation

As with the project, buildout of the No Project Alternative would result in increased traffic levels beyond existing conditions. Under the Updated Plan, buildout of the Town would result in ~~nine~~ 10 deficient intersections, based on the Town's LOS criteria. Comparatively, the No Project Alternative would result in the following 11 deficient intersections:-

- Lake Mary Road/Lakeview Road
- Main Street/Center Street

- Minaret Road/Main Street
- Main Street/Forest Trail
- Main Street Westbound/Meridian Boulevard
- Main Street Eastbound/Meridian Boulevard
- Meridian Boulevard/Majestic Pines Drive
- Minaret Road/Forest Trail
- Minaret Road/Old Mammoth Road
- Lake Mary Road/Kelly Road
- US 395 Northbound/SR 203

However, under either scenario, traffic improvements would be implemented to achieve acceptable service levels at the deficient intersections.

In addition, the Town of Mammoth Lakes in 2005 adopted an updated Development Impact Fee Schedule based on an Updated Master Facility Plan and Capital Improvement Program. The Master Facility Plan contains all required facility improvements to mitigate build-out traffic of the existing General Plan. These improvements include all circulation system improvements for streets, signals (roundabouts), bridges, transit and trails that would be necessary under the existing General Plan (the No Project Alternative). With regard to Development Impact Fees (DIFs), currently the Town collects between \$1,805 and \$3,578 per residential unit, and between \$2.90 and \$3.71 per square feet for commercial/office and industrial uses to fund street and traffic improvements. In addition, the Town collects between \$9,279 and \$15,465 per residential unit, and between \$15.47 and \$2.90 per square foot for commercial/office and industrial uses to fund transit and trail enhancements. As with the project, with the incorporation of mitigation, the No Project Alternative would result in less than significant impacts with regard to transportation and circulation.

7.3.2.14 Cultural Resources

Compared to the Updated Plan, implementation of the No Project Alternative would result in a similar level of development to that of the Updated Plan. Cultural resources could be impacted as a result of future development under the No Project Alternative. While there is a regulatory framework in place to provide protection for cultural resources, the Updated Plan would include a policy and implementation measure that does not currently exist in the General Plan to ensure the protection of cultural resources. In addition, the Updated Plan would include mitigation measures provided in Section 4.14 of the ~~Revised Draft~~ Final Program EIR. Therefore, cultural resources would not be protected to the same extent under the No Project Alternative compared with the project.

7.3.3 Conclusion and Relationship of the Alternative to Project Objectives

A comparative summary of the environmental impacts associated with the No Project Alternative with the environmental impacts anticipated under the proposed project is provided in Table 7-7 on page 7-48. This Alternative would result in a new environmental impact with regard to water supply that would not occur under the project.

As discussed above, the intensity of development and the increase in PAOT under the No Project Alternative would be slightly greater than under the project. The No Project Alternative would result in similar impacts to the Updated Plan in the areas of aesthetics; air quality; biological resources; geology, soils, and mineral resources; public safety and hazards; hydrology and water quality; land use and planning; noise; population, housing and employment; public services; public utilities (wastewater and solid waste); recreation; and transportation and circulation. With regard to transportation and circulation, while the No Project Alternative would result in an impact at 11 intersections compared with nine ~~10~~ intersections under the project, mitigation measures have been identified and incorporated into the Master Facility Plan. With regard to water supply, the assessment provided by MCWD indicated that as with the project, the No Project Alternative would result in an impact with regard to water capacity. The project would include a mitigation measure to ensure that adequate water supply would be available prior to future development. However, no such measure currently exists. Therefore, since the No Project Alternative would result in a greater population buildout and since no mechanism is in place to ensure water supply availability prior to development, the No Project would result in a significant and unavoidable impact with regard to water supply.

The No Project Alternative would meet most of the basic objectives of the project but not to the same extent as the project. The No Project Alternative would protect the unique environmental setting of the Town. However, the No Project Alternative would not provide the articulation of the importance of the environmental setting balanced with the Town's economic relationship with visitors so as to maintain a high quality of life. The No Project Alternative would retain and enhance the Town's small-town community character by providing a stable economy, high quality educational facilities and programs, a broad range of community services, and a participatory Town government. The No Project Alternative would also enhance Mammoth Lakes as a year-round resort with diverse opportunities for outdoor recreation and tourism. However, the No Project Alternative would not result in the same level of standards and design that would result under the project. The No Project Alternative would not provide as clear guidance and articulation of the desired quality of development. In other words, the Updated Plan places more emphasis on aesthetics than does the existing General Plan. Future development may not be comparable in quality under the No Project Alternative compared with the project since the Updated Plan places a greater emphasis on aesthetics than currently exists in the General Plan. The No Project Alternative has fewer land use designations compared with the project. In other words, the categories of land uses would be more general under the No Project

Alternative. Therefore, the No Project Alternative does not provide the same detail of direction on the development of visitor lodging and workforce housing as does the project. Finally, the No Project Alternative would not address recent changes in state law and does not provide detailed environmental policies related to energy conservation, building height, community services, development mitigation, and aesthetics.

7.4 ALTERNATIVE 2: WORKFORCE/AFFORDABLE HOUSING ALTERNATIVE

7.4.1 Description

The Workforce/Affordable Housing Alternative emphasizes expanded affordable and workforce housing development. The same land use categories would be used in this Alternative as in the project. However, this alternative would allow for more workforce housing within the IP zone, would allow all developments such as transient projects to be eligible for Density Bonus provisions and would allow for a doubling of density for projects which provide workforce Housing. Figure 7-2 on page 7-21 shows the locations of the various land uses under the Workforce/Affordable Housing Alternative. As can be seen in Figure 7-2, the land use pattern would be similar to the pattern proposed under the project.

The amount of land designated for non-transient residential land use would be slightly greater and the resort land use would be slightly less under this Alternative compared with the project. In comparison to the Updated Plan, the Workforce/Affordable Housing Alternative would designate additional land for affordable/workforce housing, including a re-designation of lands designated for resort development to HDR-1. This alternative would also permit housing in the IP designation; encourage accessory dwelling units and the purchase of existing transient units for workforce housing. Transfers of density between selected parcels are permitted for affordable/workforce housing.

As compared to the project, the LDR-1 and LDR-2 under this Alternative would allow the same residential densities. The Workforce/Affordable Housing Alternative would allow 12 units per acre in the HDR-1 and HDR-2 designations compared with 10 units per acre that would be allowed under the project. However, residential housing in the C-1 and C-2 designations would be 12 units per acre compared with 20 units per acre that is proposed in the Updated Plan. However, all developments would be eligible for density bonuses of up to 100% for affordable housing.

This Alternative would include land uses and policies that support the development and preservation of new and existing housing to fully meet the needs of the Town's workforce and resident population. This Alternative would further allow the greatest density for all housing

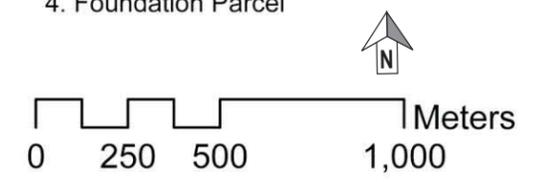
Town of Mammoth Lakes

Explanation

- Commercial 1
- Commercial 2
- High Density Residential 1
- High Density Residential 2
- Industrial
- Institutional Public
- Low Density Residential 1
- Low Density Residential 2
- Resort
- North Village Specific Plan
- Open Space
- Urban Growth Boundary
- National Forest Lands
- National Forest Lands Outside the Municipal Boundary

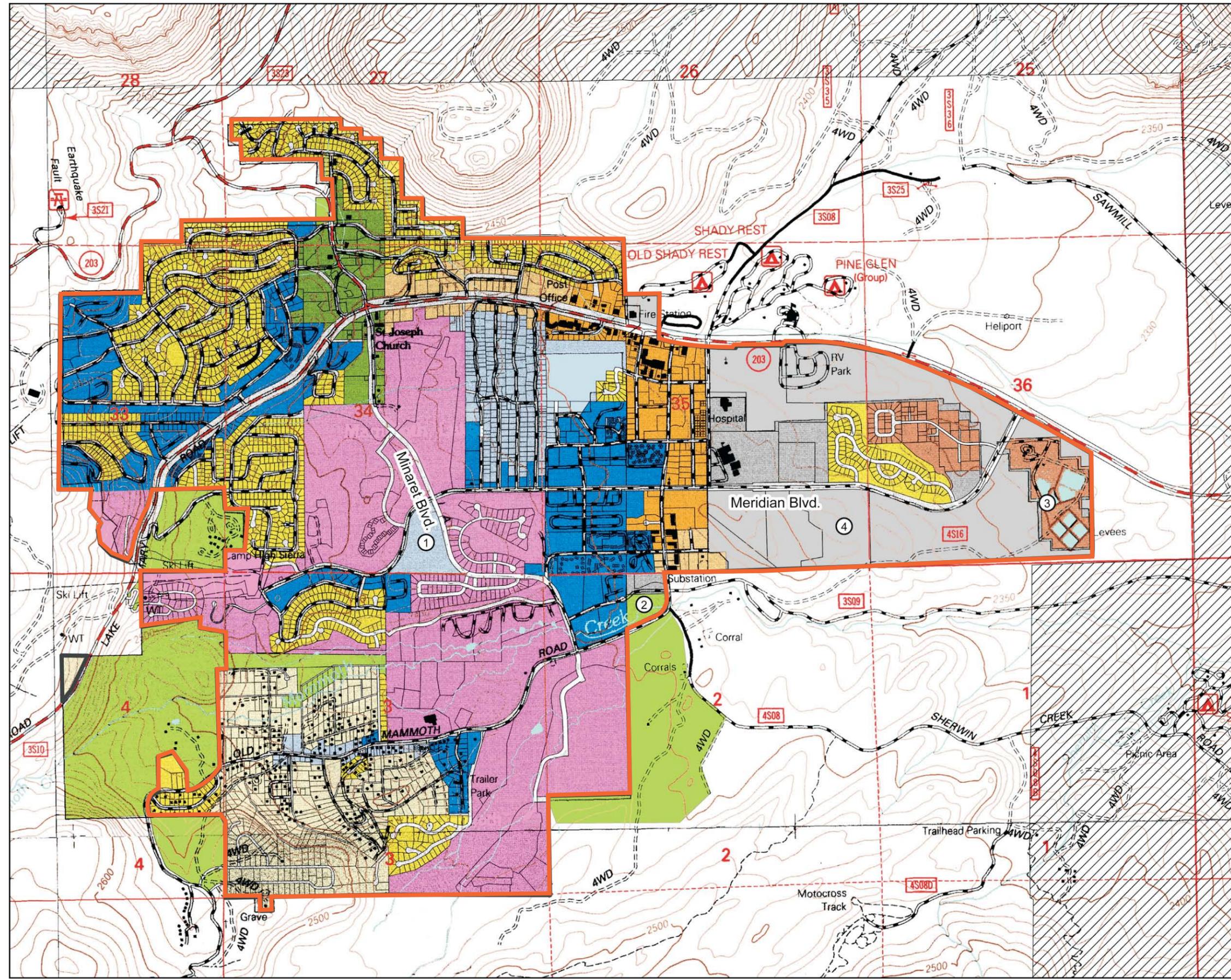
PARCELS

1. Bell-Shape Parcel
2. Mammoth Creek Park
3. Water District
4. Foundation Parcel



Base Maps: Old Mammoth,
Mammoth Mountain, Crystal
Crag & Bloody Mountain
Source: Town of Mammoth Lakes

Figure 7-2 Workforce/Affordable
Housing Alternative Land
Use Designations



projects, including visitor accommodations that provide a minimum percentage of affordable/workforce housing. This alternative would increase the density bonuses permitted for all projects from 25 percent to a maximum of 50 percent. Densities for projects that are 100 percent restricted to Town-identified affordability levels may be eligible for density increases of up to 100 percent.

Under this alternative, the anticipated people at one time would be approximately ten percent greater than the projected people at one time that would occur under the project. The peak resident and visitor population expected at buildout under the Workforce/Affordable Housing Alternative is estimated at 67,225 PAOT as compared to the ~~60,680~~ approximately 60,700 PAOT under the project.

The following provides a discussion of the land use designations under the Workforce/Affordable Housing Alternative:

Residential. As with the project, this alternative would have the same four residential land use designations. As in the project, the LDR1 would apply to single-family residential development within the Old Mammoth area, as well as those areas previously designated as SCP and zoned RR. A maximum density of two units per gross acre would be allowed. The LDR2 would apply to single-family residential development of four dwelling units per gross acre. The HDR1 designation is intended primarily to provide areas for development of multi-family housing and the HDR-2 permits transient occupancy and is intended for multi-family style developments including townhouses, condominiums and apartments. The Workforce/Affordable Housing Alternative would allow 12 units per acre in the HDR-1 and HDR-2 designations compared with 10 units per acre that would be allowed under the project. The HDR-1 designation would also be expanded to cover portions of land designated for resort purposes.

Commercial. As with the project, the Workforce/Affordable Housing Alternative would provide a C-1 and C-2 designation. The C1 designation is intended primarily to provide areas for lodging and commercial services for residents and visitors, as well as affordable/workforce housing development. The C2 designation is designed and intended to provide areas for commercial services and goods. Multi-family housing is encouraged as an accessory use. This Alternative would allow a maximum residential density of 12 units per acre compared with 20 units per acre that is proposed in the Updated Plan.

Open Space. As with the project, the OS designation is applied to lands that have significant recreational or environmental values. The OS designation permits development of facilities that support the environmental and recreational objectives of the community.

Institutional/Public. The IP designation allows for public facilities and institutional uses, and is applied to lands with anticipated use for schools, hospitals, governmental offices and facilities, museums, and related uses. Affordable and workforce housing as defined by the Town would be permitted on all IP designated land and would not be limited to IP lands located south of Meridian Boulevard and east of Old Mammoth Road as would be under the project. As with the project, for housing development the HDR 1 uses and development standards would apply with a maximum density of up to four units per gross acre. Policies encouraging adequate pedestrian and transit facilities are included to promote alternatives to private vehicle access to places of employment, study, shopping, and recreation.

Resort. As with the project, the R designation is intended to provide mixed uses consistent with a mountain resort community. However, under this Alternative the R designation would place more emphasis on the provision of affordable/workforce housing than under the project. While visitor accommodations would be the primary emphasis in the R designation, this Alternative would require the inclusion of affordable/workforce housing into each major development. This designation would be applied to large parcels capable of providing a mix of recreation, lodging, and commercial uses. Maximum density would be eight dwelling units per acre for residential uses, including visitor accommodations, whereas for the project only visitor lodging units⁸¹ would be eligible for 8 units per acre. Resort development projects are required to provide support commercial within their development area.

Industrial. As with the project, the I designation is designed and intended to accommodate industrial uses needed to support a resort community, such as light manufacturing, storage, and maintenance uses. The uses include heavy equipment storage and maintenance, batch plants, automobile repair and service, and similar uses.

Specific Plan. The North Village SP area provides for the highest intensity uses consistent with a mountain resort community. This area provides for a mix of visitor-oriented commercial and visitor lodging uses. The maximum density under the North Village Specific Plan is 3,020 rooms and 135,000 square feet of commercial. Density is not uniform, but rather is allocated by zones as specified in the North Village SP. Residential development under the SP is

⁸¹ *Visitor lodging is defined as an accommodation unit that is available for transient visitor use and not usable for permanent residency. Visitor lodging shall not be available for permanent residency and must be available for nightly rental a minimum of 10 months per year. To qualify as visitor lodging, fractional units must be available for transient lodging when not occupied by owners or members. Units may be individually owned or may be owned as a block. They shall be fully furnished with standardized FF&E and designed to be easily rented on a daily basis. On site facilities include space for a management operation, a reception area with front desk and telephone switchboard, daily housekeeping and linen service, ski and luggage storage, meeting rooms, and such other facilities as may complement a transient rental facility. All such facilities shall have front desk service available 24 hours a day.*

limited to visitor accommodations and affordable/workforce housing. Affordable/workforce housing is encouraged to be provided onsite.

Airport. As with the project, the A designation is applied to the Mammoth Yosemite Airport. Facilities and services associated with aviation including hangars, fueling, and fixed base operator services are permitted. Supporting uses including automobile rental, transient lodging, retail uses, and a 100 space RV park may be permitted. The Airport zone is designated for 250 visitor accommodation units and about 30,000 square feet of commercial development.

National Forest. As with the project, the NF designation is applied to lands administered by the Inyo National Forest that are outside the adopted UGB.

7.4.2 Impact Analysis

7.4.2.1 Aesthetics

Under the Workforce/Affordable Housing Alternative as with the project, growth would occur within the UGB. Intensity of development would be greater under the Workforce/Affordable Housing Alternative compared with the project. As with the project, continued development and redevelopment of land would permanently replace some existing views and scenic vistas with structures. Under the Workforce/Affordable Housing Alternative, as with the project, all major development projects would undergo environmental and design review on a site-specific basis, per CEQA, the Town's Municipal Code and all applicable regulatory requirements, to ensure that facilities and structures would be sited in a way that would not have substantial adverse effects to scenic vistas and to avoid the loss of scenic resources (such as trees and rock outcrops). In addition, the changes in light and glare would be similar with the Workforce/Affordable Housing Alternative and the project. The Town's regulations regarding lighting would reduce lighting impacts to the night sky. However, as with the project, this Alternative would result in significant and unavoidable lighting impacts to the night sky due to the increase in development compared with existing conditions. With regard to visual character and quality, as with the project, the Workforce/Affordable Housing Alternative would result in a change in the visual character and quality of the community through the development of vacant lands and the redevelopment of other lands. The types and intensity of developments under the Workforce/Affordable Housing Alternative would be similar to the types of development that would occur under the project. As with the project, due to the permanent change in visual character of newly developed areas of the Town, impacts to the Town's visual character and quality are significant and unavoidable.

7.4.2.2 Air Quality

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development, but the overall VMT would be slightly reduced by locating the workforce closer to employment areas. However, with the greater level of development a slight increase in wood-burning appliances would occur. Overall, due to Town Particulate Matter Ordinances, PM₁₀ concentrations would be similar-at buildout under this Alternative when compared to the project. As with the project, air quality impacts would not exceed federal standards or conflict with implementation of the AQMP. Nonetheless, the State 24-hour PM₁₀ and 1-hour O₃ standard would continue to be exceeded, in which pollutant emissions from implementation of the Workforce/Affordable Housing Alternative or the project would continue to contribute to these exceedances of State standards. As with the project, implementation of the Workforce/Affordable Housing Alternative would be considered cumulatively considerable and sensitive receptors could be exposed to substantial pollutant concentrations (PM₁₀ and O₃). As with the project, the O₃ impact is primarily the result of pollution transport from the San Joaquin Valley and is not a condition substantially generated by Town activities. Nonetheless, the Workforce/Affordable Housing Alternative would result in a significant and unavoidable air quality impact.

7.4.2.3 Biological Resources

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development. As with the project, impacts to biological resources would increase incrementally with intensified development and human activity. With the level of development expected, direct impacts to candidate, sensitive, or special species, as well as impacts to riparian habitats or other natural communities, would still be less than significant, given federal regulations and Town codes and plans in place to protect such species and habitats. However, as with the project, and given the higher PAOT that would result under this Alternative, the increased wilderness and open lands usage as may be indirectly caused by the Workforce/Affordable Housing Alternative could have a significant and unavoidable impact upon one or more of the special status wildlife or plants species discussed in Section 4.3 of this EIR.

In addition, federally protected wetlands are regulated by the U.S. Army Corps of Engineers under Section 404 of the CWA, and CDFG recognizes wetlands for their value as high quality habitat for both plants and animals. Both agencies have policies of “no net loss” of wetlands, and additionally, the Town has adopted Federal Emergency Management Agency (FEMA) requirements for setbacks within the floodplain, which would apply to the Mammoth Creek corridor. As with the project, the Workforce/Affordable Housing Alternative would result in less than significant impacts to federally protected wetlands.

Implementation of the Workforce/Affordable Housing Alternative could create barriers to wildlife movement with increased population and human activity. However, given the level of development expected at buildout, this increase would be similar to that of the project. In addition, given existing levels of urbanization within the UGB, the likelihood of disturbing a previously existing wildlife corridor is low. Furthermore, the Town has adopted Municipal Codes to ensure protection and preservation of trees and other biological resources. Therefore, as with the project, impacts to biological resources and tree preservation regarding migratory corridors and consistency with local policies or ordinances protecting biological resources would be less than significant. In addition, similar to the project, the Workforce/Affordable Housing Alternative would not conflict with the provisions of a habitat conservation plan.

7.4.2.4 Geology

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development. The Workforce/Affordable Housing would contain goals and policies that address geotechnical hazards similar to the Updated Plan. Under the Updated Plan and this Alternative, future development would be required to comply with the California Building Code as well as Section 12.08.080 of the Town Municipal Code, which requires engineered plans and a soils report to be submitted with an application for a grading permit. Future development under both the Updated Plan and this Alternative would also require detailed recommendations regarding specific techniques and designs to reduce, eliminate or avoid geotechnical hazards and site plan review by the Town to determine conformance with specific recommended geotechnical procedures. Implementation of this Alternative would not result in additional impacts related to development in areas of ground surface rupture due to faulting, seismic shaking, seismically-induced ground deformation, including liquefaction, landslides and slope instability, volcanic eruption, erosion, or expansive soils, when compared to the Updated Plan. Therefore, the Workforce/Affordable Housing Alternative would have similar geology impacts as the Updated Plan.

7.4.2.5 Public Safety and Hazards

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development. Under both this Alternative and the Updated Plan, no new impacts would be created regarding wildfires, avalanches, aircraft patterns and airport compatibility, and conflict with the Town's Emergency Operations Plan (EOP). As with the project, given that implementation of measures to reduce the potential impact of wildfires are not under the control of the Town, this potential impact would be significant and unavoidable under the Workforce/Affordable Housing Alternative.

All future development would be required to comply with all applicable regulatory requirements FAA regulations and the requirements of the Mammoth/June Lake Airport Land

Use Plan, which would result in less than significant impact regarding compatibility with airport operations. No changes to aircraft patterns would occur under this Alternative or the Workforce/Affordable Housing Alternative. Development under the Updated Plan and this Alternative would not impair implementation or physically interfere with the EOP, because no circulation changes would occur that conflict with the procedures set forth in the plan.

Development in areas with slope gradients of between 30 and 45 degrees could expose people or property to hazards such as avalanches under the Updated Plan or the Workforce/Affordable Housing Alternative. However, areas in the Town where avalanche potential has been identified have been overlaid with a Snow Deposition Design (SDD) Zone to minimize health and safety hazards. Any development within this zone would be permitted by use permit only and requires an Avalanche Risk Assessment certified by a recognized expert in the field of avalanche occurrence. Furthermore, no critical or permanently occupied facilities would be located within a high avalanche hazard area. As with the project, Municipal Code requirements for building design relative to snow would apply. Thus, impacts regarding avalanches and other snow related issues would be less than significant under both the Workforce/Affordable Housing Alternative and the Updated Plan

With regard to hazardous materials, the use of hazardous materials is generally associated with non-residential uses. The Workforce/Affordable Housing Alternative would result in less non-residential development compared with the project. However, as with the project, under the Workforce/Affordable Housing Alternative any use, storage or handling of hazardous materials would be conducted in compliance with applicable federal, state, and local regulations. Therefore, impacts under the Workforce/Affordable Housing Alternative with regard to hazardous materials would be similar to the project and would be less than significant.

7.4.2.6 Hydrology and Water Quality

The Workforce/Affordable Housing Alternative would result in a greater level of development than the project. Development within the Town under both the Workforce/Affordable Housing Alternative and the project would increase impermeable surface area, resulting in an increase of storm and irrigation water runoff. However, with the development of either the Updated Plan or the Workforce/Affordable Housing Alternative, compliance with federal, state and local water quality and waste discharge requirements, including the NPDES Program and implementation of Best Management Practices (BMPs), would be required for the construction and post-construction phases of development. Under both development scenarios, remediation of undetected contamination and BMPs to reduce the potential pollutants of concern would be implemented. BMPs would also reduce and/or eliminate erosion potential, would be incorporated into development projects. All future development would be subject to the requirements of the Mammoth Lakes Storm Drainage Master Plan (SDMP), which includes guidelines for erosion control and identifies storm drainage

facility improvements designed to accommodate development for the Mammoth Lakes area. Additionally, FEMA design standards and guidelines would apply to all development within flood prone areas. Thus, similar impacts would occur regarding flooding.

Overall, future development within the Town under the Workforce/Affordable Housing Alternative, as with the project, would result in less than significant impacts associated with water quality and hydrology. Thus, under the Workforce/Affordable Housing Alternative, impacts to hydrology and water quality would be similar to those of the Updated Plan.

7.4.2.7 Land Use and Planning

The land use pattern and distribution of land uses under the Workforce/Affordable Housing Alternative would be similar to the pattern and distribution that would occur under the project. Under this Alternative, the residential land use area would be slightly larger and the resort land use area would be slightly smaller when compared to the project. However, the total acres devoted to the various land uses under the Workforce/Affordable Housing Alternative is similar to the Updated Plan. As with the project, the ~~No-Project~~ Workforce/Affordable Housing Alternative would not physically divide an established community nor would the ~~No-Project~~ Workforce/Affordable Housing Alternative create incompatible land uses or affect the community character of an established community. The ~~No-Project~~ Workforce/Affordable Housing Alternative would not conflict with any applicable plans, policies, or regulations. Land use and planning impacts would be similar under the ~~No-Project~~ Workforce/Affordable Housing Alternative compared with the project.

7.4.2.8 Noise

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development, but the overall VMT would be slightly reduced by locating the workforce closer to employment areas. As with the project, impacts related to the 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 would be less than significant. Implementation of the measures provided in the Updated Plan along with measures provided in the Noise Element would ensure that existing and proposed sensitive uses would not exceed applicable noise standards. This significant impact would be reduced due to the slight decrease in overall VMT. However, similar to the project, there may nonetheless be a significant unavoidable impact because the noise generated by traffic from implementation of the Workforce/Affordable Housing Alternative would exceed current ambient levels by up to 6 dBA. As the Workforce/Affordable Housing Alternative results in a slight decrease in the overall VMT, the traffic noise level would also have a corresponding reduction. However, the decrease in overall traffic volumes would be approximately two percent. This reduction in traffic would not substantially reduce the noise associated with traffic. While noise

levels would be below the threshold, as with the project the increment would be substantial. Therefore, as with the project the impact would be a significant and unavoidable impact.

7.4.2.9 Population, Housing and Employment

The Workforce/Affordable Housing Alternative anticipates greater population growth than the proposed project and would result in approximately ~~67,225~~ 67,200 people at one time compared to ~~60,680~~ approximately 60,700 PAOT that would occur under the project. The estimated residential units (transient and non-transient) would be approximately 20,225 units. The additional housing under the Workforce/Affordable Housing Alternative would result from slightly higher density in the HDR-1 and HDR-2 compared with the project (12 units compared with 10 units per acre, respectively) as well as an increase in the provision of density bonuses. The Workforce/Affordable Housing Alternative would not provide for the extension or expansion of roadways into the area. In addition, the Workforce/Affordable Housing Alternative would not result in an increase in the capacity of existing infrastructure so as to provide for an increase in population. The Workforce/Affordable Housing Alternative would accommodate a relatively substantial increment in population growth, in fact, a growth greater than the project. However, as with the project, the Workforce/Affordable Housing Alternative would neither directly nor indirectly induce that growth or cause it to occur. Rather, as with the project the Alternative would shape the location, form, and behavior of the growth increment should external demand be sufficient.

7.4.2.10 Public Services

The Workforce/Affordable Housing Alternative anticipates greater population growth than the Updated Plan. The Workforce/Affordable Housing Alternative would result in a total of 67,225 PAOT or 6,545 PAOT more than under the project. As with the project, the demand for police and fire protection, schools, libraries, roadway maintenance and snow removal, and health services associated with the Workforce/Affordable Housing Alternative would increase incrementally with increased population growth. However, as with the Updated Plan project-specific environmental review and payment of the development impact fee would reduce impacts to services to a less than significant level, with the exception of libraries and health services. As with the project, impacts to libraries and health services would remain significant and unavoidable. With increases in workforce housing units over transient housing units there would be an impact to the Town's budget of which the majority is funded through Transient Occupancy Tax. These monies fund the development of workforce housing as well as Town services, such as snow removal and police services. The loss of revenue would impact the Town's ability to provide services. The impacts to public services would be greater than the impacts under the project, with the exception of snow removal, due to the greater number of PAOT. Impacts to public services would be less than significant, with the exception of libraries and health services, which would remain significant and unavoidable.

Table 7-5

Comparison of Water Supply and Demand between the No Project Alternative and the Project for Normal, Single Dry Year and Multiple Dry Years

Current Supply & Demand	Normal Year	Single Dry Year	Multiple Dry Years			
			Year 1	Year 2	Year 3	Year 4
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Demand Total Including Project	4,898	4,898	4,898	4,898	4,898	4,898
Surplus or (Deficiency)	1,862	(1,488)	292	10	(390)	(406)
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Demand Total Including Workforce/ Affordable Housing Alternative	5,430	5,430	5,430	5,430	5,430	5,430
Surplus or (Deficiency)	1,330	(2,020)	(240)	(522)	(922)	(938)

Source: MCWD, 2005

7.4.2.11 Public Utilities

As indicated above, the Workforce/Affordable Housing Alternative anticipates greater population growth than the Updated Plan. The Workforce/Affordable Housing Alternative would result in a total of 67,225 people at one time or 6,545 people at one time more than under the project. With regard to water supply, the MCWD prepared a water supply assessment for the project and provided an analysis for the alternatives under consideration. Based on the information provided by MCWD, as shown in Table 7-5 on page 7-31, the Workforce/Affordable Housing Alternative would result in a deficiency of 347, 896, and 938 acre feet of water per year in the one dry, two dry and three dry years scenarios, respectively. The deficiency that would result under the Workforce/Affordable Housing Alternative would be greater than that which would occur under the project. appreciably larger deficiencies during single dry year and multiple dry year scenarios than would the proposed General Plan Update. Therefore, similar to the project, the Workforce/Affordable Housing Alternative would result in a significant impact with regard to water supply. The Workforce/Affordable Housing would incorporate the same mitigation measure that would occur with the project to ensure that adequate water supply would be available prior to future development. Therefore, as with the project, the Workforce/Affordable Housing would result in a less than significant impact with regard to water supply.

The population increase and structural development associated with the Updated Plan and the Workforce/Affordable Housing Alternative would increase the quantity of wastewater generated and associated requirements for collection, treatment and disposal. The existing treatment facility has a capacity for 4.9 mgd. Sufficient capacity exists to accommodate the buildout projected under the project. The Workforce/Affordable Housing Alternative would have an increase of 6,545 PAOT compared with the project. The capacity of the wastewater

treatment would be sufficient to accommodate the projected growth under the ~~No Project~~ Workforce/Affordable Housing Alternative⁸². However, the increase in average people at one time under the Workforce/Affordable Housing Alternative would result in a significant impact with regard to wastewater.

With regard to solid waste, adequate capacity exists to accommodate growth projected under the project. The Workforce/Affordable Housing Alternative would generate a greater amount of solid waste. The Town is expanding its recycling capabilities to achieve the state mandated 50 percent diversion rate, which would reduce the amount of solid waste disposed of at local landfills. However, the increase in average people at one time under the Workforce/Affordable Housing Alternative would result in a significant impact with regard to solid waste.

7.4.2.12 Recreation

The Workforce/Affordable Housing Alternative would increase demands for, as well as demands upon, recreational facilities and areas, necessitating construction of additional facilities in order to maintain adequate service levels and to prevent overuse and the resultant physical deterioration of existing facilities. The Workforce/Affordable Housing Alternative would result in a greater resident population in the Town compared with the project. Under the Workforce/Affordable Housing Alternative, the permanent/seasonal population would be approximately 19,800. Based on the ratio of 5 acres per 1,000 persons, this Alternative would require 99 acres of park land, or 24 acres more than under the project. As with the project, the increase in demand on existing facilities as well as the unknown locations for additional park acreage, the impacts to recreation would be significant and unavoidable.

7.4.2.13 Transportation and Circulation

The Workforce/Affordable Housing Alternative would result in the following 1044 intersections having service levels that exceed the Town's thresholds:

- Lake Mary Road/Lakeview Road
- Main Street/Center Street
- Minaret Road/Main Street
- Main Street/Forest Trail
- Main Street Westbound/Meridian Boulevard
- Main Street Eastbound/Meridian Boulevard

⁸² As per MCWD response to Original Draft EIR, letter dated April 2005.

- Meridian Boulevard/Majestic Pines Drive
- Minaret Road/Forest Trail
- Minaret Road/Old Mammoth Road
- Lake Mary Road/Kelly Road

In comparison, the project would result in service levels that exceed the Town's thresholds at nine ~~10~~-intersections. The traffic study, which is contained in Appendix F of this EIR, provides mitigation measures that would be necessary to reduce the impacts under this Alternative to a less than significant level. As with the project, feasible mitigation measures have been identified to reduce the impacts to less than significant levels. Mitigation measures would be incorporated under this Alternative. As with the project the Master Facility Plan would be amended to incorporate the mitigation measures if this Alternative were to be adopted. Fees would be collected by the Town in order to implement the necessary mitigation measures. As with the project, with the incorporation of mitigation, the Workforce/Affordable Housing Alternative would result in less than significant impacts with regard to transportation and circulation.

7.4.2.14 Cultural Resources

Compared to the Updated Plan, implementation of the Workforce/Affordable Housing Alternative would result in a greater level of development. Cultural resources could be impacted as a result of future development under the Workforce/Affordable Housing Alternative. The Workforce/Affordable Housing Alternative would incorporate the same mitigation measure to ensure that the level of impact to cultural resources would be reduced to a less than significant level. Therefore, impacts to cultural resources under the Workforce/Affordable Housing Alternative would be the same compared with the project.

7.4.3 Conclusion and Relationship of the Alternative to Project Objectives

A comparative summary of the environmental impacts associated with the Workforce/Affordable Housing Alternative with the environmental impacts anticipated under the proposed project is provided in Table 7-7 on page 7-48. This Alternative would result in new environmental impacts in public utilities that would not occur under the project and more severe impacts to ~~air quality as a result of increased traffic and~~ wildlife as a result of increased use of the surrounding environment for recreation. Due to the increase in population, the demand for utilities would exceed capacities.

The Workforce/Affordable Housing Alternative would result in similar impacts to the Updated Plan in the areas of aesthetics; air quality, geology, soils, and mineral resources; public safety and hazards; hydrology and water quality; land use and planning; noise; population, and

housing and employment; and cultural resources. Impacts on public services and public utilities would be greater under the Workforce/Affordable Housing Alternative compared with the project. However, impacts regarding fire, police, schools, and roadway maintenance would remain less than significant while impacts to libraries and health services would be significant and unavoidable. Similarly, impacts regarding recreation would be greater than under the project but in both the impact would be significant and unavoidable. Transportation and Circulation impacts would be greater in that 10 ~~4~~-intersections compared to 9 ~~40~~-intersections under the project would be impacted at buildout. However, as with the project, with the incorporation of mitigation measures, the impact would be reduced to a less than significant level.

The Workforce/Affordable Housing Alternative would achieve the project objective of providing adequate and appropriate housing that residents and workers can afford. This Alternative would focus on the provision of housing for the workforce that is affordable. However, this Alternative would not meet the objective of retaining and enhancing the Town's cohesive small-town community character by providing a stable economy, high quality educational facilities and programs, a broad range of community services, and a participatory Town government to the same extent as the project. Due to the significant population increase that would occur under this Alternative, the Alternative would not retain the Town's small-town character. In addition, due to the population increase, the demand for public services and utilities would exceed the Town's ability to provide adequate capacity. Therefore, this Alternative would not meet the project objectives.

7.5 ALTERNATIVE 3: REDUCED DEVELOPMENT ALTERNATIVE

7.5.1 Description

The Reduced Development Alternative reduces overall development and an increase in the provision of open space with the objective of reducing traffic, air pollution, and conserving natural resources while still providing housing for resident and workforce population. Figure 7-3 on page 7-35 shows the locations of the various land uses under the Reduced Development Alternative. In comparison with the project, areas designated for Resort and Institutional Public use would be reduced. More specifically, much of the eastern portion of the UGB would be designated OS in this Alternative compared to IS under the project. In addition, the bell shaped property in the central portion of the UGB would be designated OS under this Alternative compared to a Resort designation under the project. The Reduced Development Alternative would also change permitted uses at the Airport from visitor accommodations to Industrial uses.

As shown in Table 7-3 on page 7-8, compared to the project, residential areas would have similar allowable densities but commercial areas would permit substantially less residential density (10 units per acres in this Alternative compared to 20 units per acre in the project). In

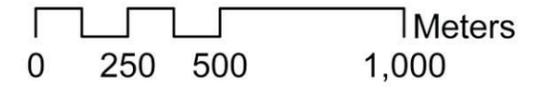
Town of Mammoth Lakes

Explanation

- Commercial 1
- Commercial 2
- High Density Residential 1
- High Density Residential 2
- Industrial
- Institutional Public
- Low Density Residential 1
- Low Density Residential 2
- Resort
- North Village Specific Plan
- Open Space
- Urban Growth Boundary
- National Forest Lands
- National Forest Lands Outside the Municipal Boundary

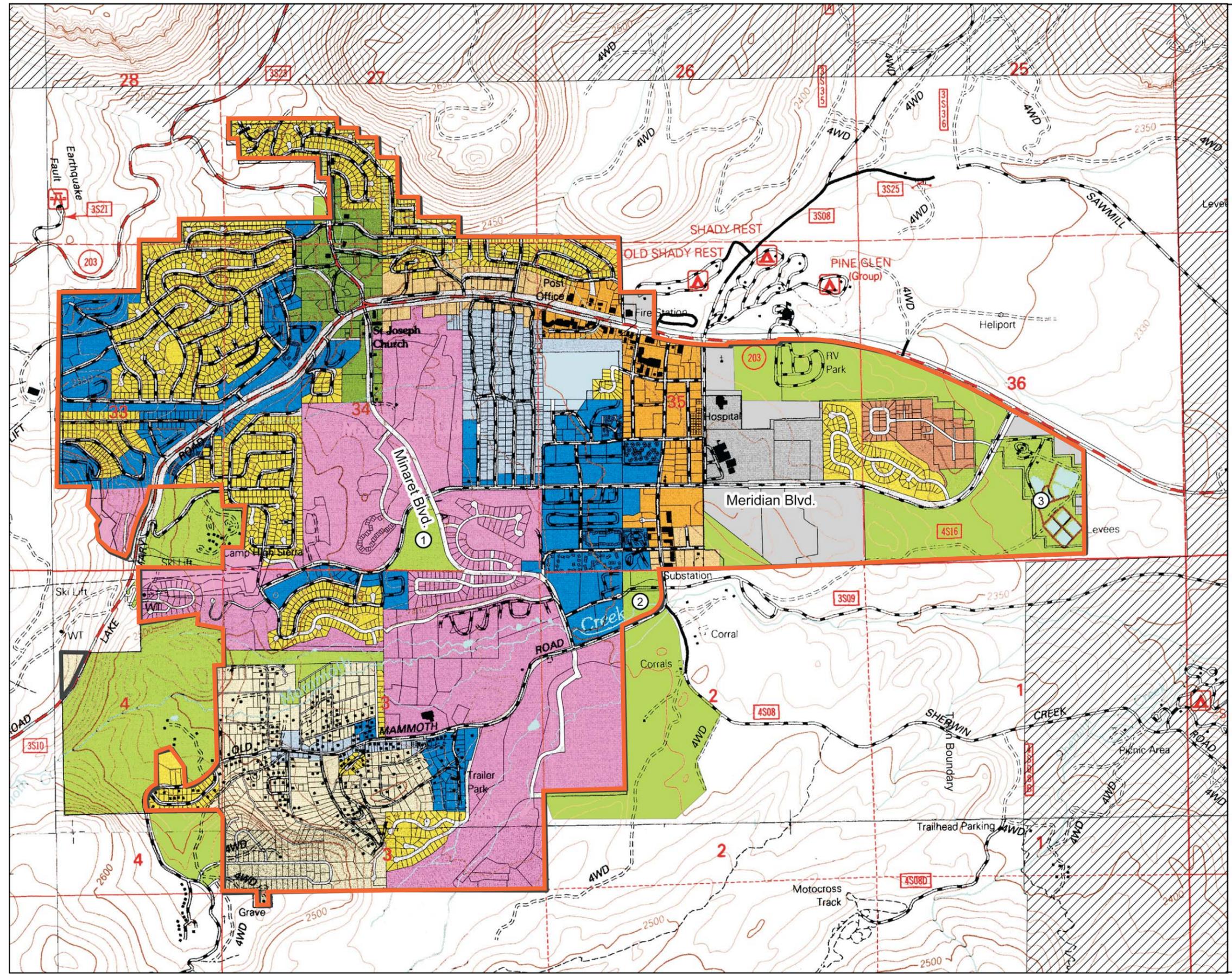
PARCELS

1. Bell-Shape Parcel
2. Mammoth Creek Park
3. Water District
4. Foundation Parcel



Base Maps: Old Mammoth, Mammoth Mountain, Crystal Crag & Bloody Mountain
 Source: Town of Mammoth Lakes

Figure 7-3 Reduced Development Alternative Land Use Designations



terms of intensity of development, while the area designated for residential land use would be similar to that under the project, the total number of units would be substantially less than the Updated Plan since the permitted densities in commercial areas would be less. This Alternative would reduce density for most undeveloped residential/visitor accommodation properties in the town while emphasizing the provision of affordable/workforce housing through the purchase of existing condominiums rather than through new construction. It is expected that this Alternative would have primary effect in reducing the Town's transient and visitor-serving capacity relative to the project.

Under this Alternative the anticipated population would be almost 16 percent less than the project. The peak resident and visitor population expected at buildout under the Reduced Development Alternative is estimated at ~~51,210~~ approximately 51,200 PAOT as compared to the ~~60,680~~ approximately 60,700 PAOT under the project.

The following provides a discussion of the land use designations under the Reduced Development Alternative:

Residential. As with the project, this alternative would have the same four residential land use designations. As in the project, the LDR1 would apply to single-family residential development within the Old Mammoth area, as well as those areas previously designated as SCP and zoned RR. A maximum density of two units per gross acre would be allowed. The LDR2 would apply to single-family residential development of four dwelling units per gross acre. The HDR1 designation preserves areas in town for resident housing by prohibiting transient visitor use. The HDR 2 designation permits transient occupancy and is intended for multi-family style developments including townhouses, condominiums, and apartments. The Reduced Development Alternative would allow 10 units per acre in the HDR-1 and HDR-2 designations, the same as would be allowed under the project.

Commercial. As with the project, the Reduced Development Alternative would provide a C-1 and C-2 designation. The C1 designation is intended primarily to provide areas for lodging and commercial services for residents and visitors, as well as residential development. The C2 designation is designed and intended to provide areas for commercial services and goods. Multi-family housing is encouraged as an accessory use. This Alternative would allow a maximum residential density of 10 units per acre compared with 20 units per acre that is proposed in the Updated Plan.

Open Space. The OS designation permits development of facilities that support the environmental and recreational objectives of the community and may include public recreation facilities such as parks, athletic fields, ski areas, golf courses, and community gathering spaces. Under this Alternative, the OS designation would remain on the eastern portion of the ~~UBG~~

UGB instead of being designated as IP, and the bell-shaped property would remain as OS instead of being designated Resort.

Institutional/Public. The IP designation allows for public facilities and institutional uses, and is applied to lands with anticipated use for schools, hospitals, governmental offices and facilities, museums, and related uses. The IP-designated land would not allow development of affordable~~Affordable~~ and workforce housing as defined by the Town ~~would not be permitted on all IP-designated land.~~

Resort. The R designation is intended to provide mixed uses consistent with a mountain resort community. Visitor accommodations are the primary emphasis and affordable/workforce housing is incorporated into each major development. This designation is generally applied to large parcels capable of providing a mix of recreation, lodging, and commercial uses. New developments are physically connected with an integrated system of streets, sidewalks, and recreational paths to all primary visitor oriented destinations. Maximum densities would be six units per acre for residential uses, including visitor accommodations. In comparison with the project, this Alternative would allow approximately 25% less visitor lodging at six units per acre compared with eight units per acre under the project. Resort development projects are required to provide support commercial within their development area. Under this Alternative, this designation would not be applied to the bell-shaped parcel, and that parcel would remain designated OS.

Industrial. As with the project, the I designation would accommodate industrial uses needed to support a resort community, such as light manufacturing, storage, and maintenance uses. Other permitted uses include heavy equipment storage and maintenance, batch plants, automobile repair and service, and similar uses. Under this Alternative, the Mammoth Mountain RV Park and the National Forest Land to the east and the land between the Mammoth Lakes Foundation property and the Mammoth Community Water District facilities in the South Gateway would not be designated I but would remain as Open Space.

Specific Plan. The North Village SP area provides for the highest intensity uses consistent with a mountain resort community. This area provides for a mix of visitor-oriented commercial and visitor lodging uses. The maximum density under the North Village SP is 2,656 rooms and 135,000 square feet of commercial. Density is not uniform but allocated by zones as specified in the North Village SP. Residential development under the SP designation is limited to visitor accommodations and affordable/workforce housing. Affordable/workforce housing is encouraged to be provided on-site. Total density in the North Village under this Alternative would be reduced by approximately 12 percent from current zoning after accounting for Development Agreements.

Airport. The A designation is applied to the Mammoth Yosemite Airport. Facilities and services associated with aviation including hangars, fueling, and fixed base operator services are permitted. Supporting uses may include automobile rental and retail uses. The Airport designation would not permit residential uses, but would permit up to 25 acres of industrial development.

National Forest. As with the project, the NF designation is applied to lands administered by the Inyo National Forest that are outside the adopted UGB.

7.5.2 Impact Analysis

7.5.2.1 Aesthetics

Under the Reduced Development Alternative as with the project, growth would occur within the UGB. Intensity of development would be less under the Reduced Development Alternative compared with the project. However, as with the project, continued development and redevelopment of land would permanently replace some existing views and scenic vistas with structures. Under the Reduced Development Alternative, as with the project, all major development projects would undergo environmental and design review on a site-specific basis, per CEQA, the Town's Municipal Code and all applicable regulatory requirements, to ensure that facilities and structures would be sited in a way that would not have substantial adverse effects to scenic vistas and to avoid the loss of scenic resources (such as trees and rock outcrops). In addition, the changes in light and glare would be less with the Reduced Development Alternative than with the project. As with the project, the Town's regulations regarding lighting would serve to reduce lighting impacts to the night sky. While lighting would be less compared with the project, lighting impacts to the night sky would remain significant and unavoidable due to the increase in development compared with existing conditions. With regard to visual character and quality, as with the project, the Reduced Development Alternative would result in a change in the visual character and quality of the community through the development of vacant lands and the redevelopment of other lands. However, the degree and extent of impacts associated with Reduced Development Alternative would be less than the Updated Plan because it would not allow as much growth or development as the proposed Updated Plan. However, the impact to visual character and quality would remain significant and unavoidable.

7.5.2.2 Air Quality

Compared to the Updated Plan, implementation of the Reduced Development Alternative would reduce future development densities by approximately 20 percent. However, overall VMT would be reduced by approximately ~~10~~ nine percent. ~~Overall,~~ Due to existing Town Particulate Matter Ordinances, PM₁₀ concentrations would be similar at buildout. As with the

project, air quality impacts would not exceed federal standards or conflict with implementation of the AQMP. Nonetheless, the State 24-hour PM₁₀ and 1-hour O₃ standard would continue to be exceeded, in which pollutant emissions from implementation of the Reduced Development Alternative or the project would continue to contribute to these exceedances of State standards. As with the project, implementation of the Reduced Development Alternative would be considered cumulatively considerable and sensitive receptors could be exposed to substantial pollutant concentrations (PM₁₀ and O₃). However, the O₃ impact is primarily the result of pollution transport from the San Joaquin Valley and is not a condition substantially generated by Town activities, policies, or the Updated Plan. Nonetheless, this air quality impact would be significant and unavoidable.

7.5.2.3 Biological Resources

Under the Reduced Development Alternative, impacts to biological resources would be less than those of the project, since the Alternative would preserve more open space and would reduce future development densities by 20 percent. The Reduced Development Alternative would result in a total of 575 acres of land designated for Open Space uses, while the Updated Plan would include 295 acres designated for Open Space use. The open space would maintain existing native vegetation and wildlife habitats; however, human activity associated with informal recreational uses of the open space could create impacts to these habitats. Nevertheless, impacts associated with use of the open space would be less than those resulting from development as proposed by the project. As such, direct impacts to candidate, sensitive, or special species, as well as impacts to riparian habitats or other natural communities, would be less than significant, given federal regulations and Town codes and plans in place to protect such species and habitats. However, as with the project, while the PAOT would be less than the project, the increased wilderness and open lands usage as may be indirectly caused by the Reduced Development Alternative could have a significant and unavoidable impact upon one or more of the special status wildlife or plants species discussed in Section 4.3 of this EIR.

In addition, federally protected wetlands are regulated by the U.S. Army Corps of Engineers under Section 404 of the CWA, and CDFG recognizes wetlands for their value as high quality habitat for both plants and animals. Both agencies have policies of “no net loss” of wetlands, and additionally, the Town has adopted Federal Emergency Management Agency (FEMA) requirements for setbacks within the floodplain, which would apply to the Mammoth Creek corridor. As with the project, the Reduced Development Alternative would result in less than significant impacts to federally protected wetlands.

Implementation of the Reduced Development Alternative could create barriers to wildlife movement with increased population and human activity. However, given the level of development expected at buildout, this increase would be similar to that of the project. In addition, given existing levels of urbanization within the UGB, the likelihood of disturbing a

previously existing wildlife corridor is low. Furthermore, the Town has adopted Municipal Codes to ensure protection and preservation of trees and other biological resources. Under the Reduced Development Alternative, impacts to biological resources would be less than those of the Updated Plan. As with the project, impacts to biological resources and tree preservation regarding migratory corridors and consistency with local policies or ordinances protecting biological resources would be less than significant. In addition, similar to the project, the Reduced Development Alternative would not conflict with the provisions of a habitat conservation plan.

~~The Reduced Development Alternative would result in a total of 575 acres of land designated for Open Space uses, while the Updated Plan would include 295 acres designated for Open Space use. This land would not provide recreation facilities and would be reserved for conservation.~~

7.5.2.4 Geology

Compared to the Updated Plan, implementation of the Reduced Development Alternative would result in less development. The Reduced Development Alternative would contain goals and policies that address geotechnical hazards similar to the Updated Plan. Under the Updated Plan and this Alternative, future development would be required to comply with the California Building Code as well as Section 12.08.080 of the Town Municipal Code, which requires engineered plans and a soils report to be submitted with an application for a grading permit. Future development under both the Updated Plan and this Alternative would also require detailed recommendations regarding specific techniques and designs to reduce, eliminate or avoid geotechnical hazards and site plan review by the Town to determine conformance with specific recommended geotechnical procedures. Implementation of this Alternative would not result in additional impacts related to development in areas of ground surface rupture due to faulting, seismic shaking, seismically-induced ground deformation, including liquefaction, landslides and slope instability, volcanic eruption, erosion, or expansive soils, when compared to the Updated Plan. Therefore, the Reduced Development Alternative would have similar geology impacts as the Updated Plan.

7.5.2.5 Public Safety and Hazards

Compared to the Updated Plan, implementation of the Reduced Development Alternative would result in the development of less acreage within the urban growth boundary. Under both this Alternative and the Updated Plan, no new impacts would be created regarding wildfires, avalanches, aircraft patterns and airport compatibility, and conflict with the Town's EOP. Given that implementation of measures to reduce the potential impact of wildfires are not under the control of the Town, this potential impact is considered to be significant and unavoidable under both the Updated Plan and the Reduced Development Alternative.

While this Alternative would allow industrial development within the Airport designation all future development would be required to comply with all applicable regulatory requirements FAA regulations and the requirements of the Mammoth/June Lake Airport Land Use Plan, which would result in less than significant impact regarding compatibility with airport operations. No changes to aircraft patterns would occur under this Alternative or the Reduced Development Alternative. Development under the Updated Plan and this Alternative would not impair implementation or physically interfere with the EOP, because no circulation changes would occur which conflict with the procedures set forth in the plan.

Development in areas with slope gradients of between 30 and 45 degrees could expose people or property to hazards such as avalanches under the Updated Plan or the Reduced Development Alternative. However, areas in the Town where avalanche potential has been identified have been overlaid with a SDD Zone to minimize health and safety hazards. Any development within this zone would be permitted by use permit only and requires an Avalanche Risk Assessment certified by a recognized expert in the field of avalanche occurrence. Furthermore, no critical or permanently occupied facilities would be located within a high avalanche hazard area. Thus, impacts regarding avalanches would be less than significant under both the Reduced Development Alternative and the Updated Plan

With regard to hazardous materials, the use of hazardous materials is generally associated with non-residential uses. The Reduced Development Alternative would result in less non-residential development compared with the project. However, as with the project, under the Reduced Development Alternative any use, storage or handling of hazardous materials would be conducted in compliance with applicable federal, state, and local regulations. Therefore, impacts under the Reduced Development Alternative with regard to hazardous materials would be similar to the project and would be less than significant.

7.5.2.6 Hydrology and Water Quality

Development within the Town under both the Updated Plan and Reduced Development Alternative would increase impermeable surface area, resulting in an increase of storm and irrigation water runoff. However, with the development of either the Updated Plan or the Reduced Development Alternative, compliance with federal, state and local water quality and waste discharge requirements, including the NPDES Program and implementation of BMPs, would be required for the construction and post-construction phases of development. Under both development scenarios, remediation of undetected contamination and BMPs to reduce the potential pollutants of concern would be implemented. BMPs would also reduce and/or eliminate erosion potential, would be incorporated into development projects. All future development would be subject to the requirements of the SDMP, which includes guidelines for erosion control and identifies storm drainage facility improvements designed to accommodate

development for the Mammoth Lakes area. Additionally, FEMA design standards and guidelines would apply to all development within flood prone areas.

Overall, future development within the Town under the Updated Plan or the Reduced Development Housing Alternative would result in less than significant impacts associated with water quality and hydrology. However, since less area would be developed with urbanized uses under this Alternative when compared to the Updated Plan, there would be less runoff with potential urban pollutants and more natural infiltration than the Updated Plan. Thus, impacts to hydrology and water quality would be less under this Alternative when compared to the Updated Plan.

7.5.2.7 Land Use and Planning

The land use pattern and distribution of land uses under the Reduced Development Alternative would be different than the pattern and distribution that would occur under the project. The total acres devoted to the various land uses under the Reduced Development Alternative would be different than under the Updated Plan (see Table 7-3). Under this Alternative, the open space area would be larger by 200 acres, mostly in the eastern portion of the UGB. In addition, this Alternative would result in an open space area in the central portion of the UGB, as the bell shaped parcel would be designated OS rather than R as it would be designated in the project. As with the project, the Reduced Development Alternative would not physically divide an established community nor would the Reduced Development Alternative create incompatible land uses or affect the community character of an established community. The Reduced Development Alternative would not conflict with any applicable plans, policies, or regulations. Land use and planning impacts would be similar under the Reduced Development Alternative compared with the project.

7.5.2.8 Noise

Compared to the Updated Plan, implementation of the Reduced Development Alternative would reduce future development densities by approximately 20 percent, with a resulting reduction in the overall VMT of approximately 10 percent. As with the project, impacts related to the exposure of persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be less than significant. Implementation of the measures provided in the Updated Plan along with measures provided in the Noise Element would ensure that existing and proposed sensitive uses would not exceed applicable noise standards. This significant impact would be reduced due to the slight decrease in overall VMT. However, similar to the project, there may nonetheless be a significant unavoidable impact because the noise generated by traffic from implementation of the Reduced Development Alternative would exceed current ambient levels by up to 6 dBA. As the Reduced Development Alternative results in a slight decrease in the overall VMT, the traffic noise level

would also have a corresponding reduction. However, the decrease in overall impacts would be approximately ten percent and inaudible.

7.5.2.9 Population, Housing and Employment

The Reduced Development Alternative anticipates less population growth than the proposed Project, and would result in approximately 51,210 people at one time compared to ~~60,680~~ approximately 60,700 PAOT that would occur under the project. This Alternative would result in 9,470, or almost 16 percent, less people at one time compared with the project. The Reduced Development Alternative restricts growth and development compared with the project and would result in a decreased number of residential units when compared to the Updated Plan, including an appreciable reduction in transient/visitor-serving lodging capacity. The estimated residential units of all types would be approximately 15,270 units.

The Reduced Development Alternative would result in fewer employment opportunities, which could be viewed as an adverse impact on employment, and in a less stable community employment profile throughout the year. This is because the Updated Plan's provision for expanded transient capacity specifically addresses the Town's objective to attract destination resort uses and amenities which lead to more balanced mid-week and seasonal visitation. Neither the project nor the existing Reduced Development Alternative would provide for the extension or expansion of roadways into the area and would not result in an increase in the capacity of existing infrastructure so as to provide for an increase in population. Similar to the project, the Reduced Development Alternative would accommodate a relatively substantial increment in population growth. However, as with the project, the Reduced Development Alternative would neither directly nor indirectly induce that growth or cause it to occur. Rather, as with the project the Alternative would shape the location, form, and behavior of the growth increment should external demand be sufficient.

7.5.2.10 Public Services

As indicated above, the projected population under the Reduced Development Alternative would be 51,210 people at one time compared to ~~60,680~~ approximately 60,700 PAOT under the project. The Reduced Development Alternative would allow for up to 15,270 dwelling units or less than nine percent fewer than the estimated 16,710 dwelling units which would be allowed by the Updated Plan. As with the project, the demand for police and fire protection, schools, libraries, roadway maintenance and snow removal, and health services associated with the Reduced Development Alternative would increase incrementally with increased population growth. However, the demand would not be as great as under the project given that the Reduced Development Alternative would result in 9,470 less people at one time compared with the project. As with the project, project-specific environmental review and payment of the development impact fee would reduce impacts to services to a less than

Table 7-6

Comparison of Water Supply and Demand between the No Project Alternative and the Project for Normal, Single Dry Year and Multiple Dry Years

Current Supply & Demand	Normal Year	Single Dry Year	Multiple Dry Years			
			Year 1	Year 2	Year 3	Year 4
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Demand Total Including Project	4,898	4,898	4,898	4,898	4,898	4,898
Surplus or (Deficiency)	1,862	(1,488)	292	10	(390)	(406)
Supply Total	6,760	3,410	5,190	4,908	4,508	4,492
Demand Total Including Reduced Development Alternative	4,506	4,506	4,506	4,506	4,506	4,506
Surplus or (Deficiency)	2,254	(1,096)	684	402	2	(14)

Source: MCWD, 2005

significant level, with the exception of libraries and health services since the Town does not have control over the library and health care services. As with the project, impacts to libraries and health services would remain significant and unavoidable.

7.5.2.11 Public Utilities

The Reduced Development Alternative would result in a population of ~~51,210~~ approximately 51,200 people at one time, which is considerably less than the population at one time under the project (~~60,680~~ approximately 60,700 people at one time). With regard to water supply, the MCWD prepared a water supply assessment for the project and provided an analysis for the alternatives under consideration. Based on the information provided by MCWD, as shown in Table 7-6 on page 7-44, the Reduced Project Alternative would result in a ~~deficiency in year three in the dry year scenario. The deficiency that would result~~ deficiencies in a single dry year scenario and in the fourth year of a multiple dry year scenario. In each case, the predicted deficiency under the Reduced Development Alternative would be less than that which would occur under the project proposed General Plan Update. However, ~~similar to the project,~~ the Reduced Development Alternative would still result in a significant impact with regard to water supply. The Reduced Development Alternative would incorporate the same mitigation measure that would occur with the project to ensure that adequate water supply would be available prior to future development. Therefore, as with the project, with incorporation of mitigation, the Reduced Development Alternative would result in a less than significant impact with regard to water supply.

The population increase and structural development associated with the Updated Plan and the Reduced Development Alternative would increase the quantity of wastewater generated and associated requirements for collection, treatment and disposal compared with existing conditions.

The existing treatment facility has a capacity for 4.9 mgd. Sufficient capacity exists to accommodate the buildout projected under the project. The Reduced Development Alternative would have a reduction of 9,470 people at one time compared with the project. Therefore, the capacity of the wastewater treatment would be sufficient to accommodate the projected growth under the Reduced Development Alternative. Therefore, as with the project, the Reduced Development Alternative would result in a less than significant impact with regard to wastewater.

With regard to solid waste, adequate capacity exists to accommodate growth projected under the project. The Reduced Development Alternative would result in a substantial reduction in the generation of solid waste due to the reduced buildout with 9,470 less people at one time under the Reduced Development Alternative compared with the project. In addition, the Town is expanding its recycling capabilities to achieve the state mandated 50 percent diversion rate, which will reduce the amount of solid waste disposed of at local landfills. Therefore, as with the project, impacts to solid waste would be less than significant.

7.5.2.12 Recreation

As with the project, the Reduced Development Alternative would increase demands for, as well as demands upon, recreational facilities and areas, necessitating construction of additional facilities in order to maintain adequate service levels and to prevent overuse and the resultant physical deterioration of existing facilities compared with existing conditions. However, the Reduced Development Alternative would result in a considerably lower resident population in the Town. Under the Reduced Development Alternative, the permanent/seasonal population would be approximately 12,170 people. Based on the ratio of five acres per 1,000 persons, this Alternative would require approximately 61 acres of park land, or 14 acres less than under the project. Overall, the impacts on to existing recreational facilities associated with the Reduced Development Alternative would be less than the Updated Plan. However, as with the project, the increase in demand on existing facilities as well as the unknown locations for additional park acreage, the impacts to recreation would be significant and unavoidable. Since Mammoth Creek Park would not be redesignated under this Alternative, the potential loss of a park that would occur under the project would not occur under this Alternative.

The Reduced Development Alternative would result in a total of 575 acres of land designated for Open Space uses, while the Updated Plan would include 295 acres designated for Open Space use. However, this land would not provide recreation facilities and would be reserved for conservation.

7.5.2.13 Transportation and Circulation

As with the project, buildout of the Reduced Development Alternative would result in increased traffic levels beyond existing conditions. The Reduced Development Alternative would result in the following eight intersections having service levels that exceed the Town's thresholds:

- Lake Mary Road/Lakeview Road
- Main Street/Center Street
- Minaret Road/Main Street
- Main Street/Forest Trail
- Main Street Eastbound/Meridian Boulevard
- Minaret Road/Forest Trail
- Minaret Road/Old Mammoth Road
- Minaret Road/Meridian Boulevard

In comparison, the project would result in service levels that exceed the Town's thresholds at nine ~~10~~ intersections. The traffic study, which is contained in Appendix F of this EIR, provides mitigation measures that would be necessary to reduce the impacts to a less than significant level. As with the project, feasible mitigation measures have been identified to reduce the impacts to less than significant levels. As with the project, the Master Facility Plan would be amended to incorporate the mitigation measures if this Alternative were to be adopted. Fees would be collected by the Town in order to implement the necessary mitigation measures. Therefore, as with the project, impacts to transportation and circulation would be less than significant.

7.5.2.14 Cultural Resources

Compared to the Updated Plan, implementation of the Reduced Development Alternative would result in a similar level of development to that of the Updated Plan. Cultural resources could be impacted as a result of future development under the Reduced Development Alternative. The Reduced Development Alternative would incorporate the same mitigation measure to ensure that the level of impact to cultural resources would be reduced to a less than significant level. Therefore, impacts to cultural resources would be under the Reduced Development Alternative would be the same compared with the project.

7.5.3 Conclusion and Relationship of the Alternative to Project Objectives

A comparative summary of the environmental impacts associated with the Reduced Development Alternative with the environmental impacts anticipated under the proposed project

is provided in Table 7-7 on page 7-48. No impacts would be greater under the Reduced Development Alternative when compared to the Updated Plan.

As the Reduced Development Alternative would result in less development and population at buildout, the degree of impacts would be reduced. However, as with the project, the Reduced Development Alternative would result in similar impacts as the Updated Plan in the areas of aesthetics; air quality; biological resources; geology, soils, and mineral resources; public safety and hazards; hydrology and water quality; land use and planning; noise; population, housing and employment; and cultural resources. While impacts to public services, public utilities, and recreation would be less compared with the project due to the reduced PAOT, impacts would be the same in terms of level of significance. The Reduced Development Alternative would impact eight intersections compared with nine ~~10~~ intersections under the project. However, as with the project, with the incorporation of mitigation measures, the impact would be reduced to a less than significant level.

The Reduced Development Alternative would not meet the project objectives to the same extent as the project. The Reduced Development Alternative would retain a limited urbanized area. While the Reduced Development Alternative would retain the same UGB as the project, more areas within the UGB would be designated open space and would be protected as conservation areas. Therefore, the Reduced Development Alternative would provide protection of the surrounding environment and the Town's small-town atmosphere to a greater extent than the project. The Reduced Development Alternative would achieve a portion of the project objective to sustain and protect the unique environmental setting of the Town to a greater degree than the project since less area within the UGB would be developed. The Reduced Development Alternative would not achieve or would hinder achievement of other community objectives including the overall goal of an economy that is strong and stable year-round and the objectives of:

- Providing adequate housing. The Reduced Development Alternative would lower the availability of land for workforce and other housing.
- Increasing off-peak visitation through longer stays and higher occupancy rates. This alternative would reduce the town's ability to create new visitor accommodations that respond to the changing market place.
- Stabilizing employment opportunities throughout the seasons and the year.
- Ensuring the provision of a range of events, facilities, and services that enhance the resort economy. Both directly by reducing development opportunities, and indirectly by reducing future revenues, this alternative reduces the provision of these community desired facilities and services.
- Implementation of adopted master plans. Achievement of the Reduced Development Alternative would require revisions to master and specific plans, in some cases part way through their implementation.

7.6 THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126(d) of the CEQA Guidelines indicates that an analysis of alternatives to the proposed project shall identify one alternative to the project as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify the environmentally superior alternative from among the other alternatives. Table 7-7 on page 7-48 provides a summary comparison of the impacts of the various project alternatives.

As discussed above, the buildout under the No Project Alternative would be slightly greater than that which would occur under the project. As a result, the No Project Alternative would result in similar impacts on the physical environment as the project and would not be environmentally superior to the project. Rather, the Reduced Development Alternative would be environmentally superior to the project since it would result in somewhat less physical impact than the project. While the Reduced Development Alternative would incrementally reduce the severity of project impacts, this Alternative would not eliminate any impacts that would result under the project.

However, the Reduced Development Alternative would not realize key objectives of the project to the extent that the project would. While the Reduced Development Alternative would retain the same UGB as the project and, therefore, would similarly limit urbanized area, more areas within the UGB would be designated open space and would be retained as conservation areas. Therefore, the Reduced Development Alternative would maintain the surrounding environment and the Town's small-town atmosphere to a greater extent than the project. While the reduction in development within the UGB would be partly consistent with the project objective to sustain and protect the unique environmental setting of the Town, the Reduced Development Alternative would not support the equally important part of this same objective regarding the Town's vital economic relationship with resort visitation since the Reduced Development Alternative would provide considerably less visitor-serving capacity than the project. This dilution in visitor-serving capacity would erode this primary source of economic growth which is expected to provide the Town's means of delivering on several of the public service and facility objectives that directly relate to community quality of life. For example, the Reduced Development Alternative would reduce the critical mass of residential and lodging capacity in the vicinity of North Village. This limitation in North Village would make the success of the area as a major visitor destination less likely. In addition, the Reduced Development Alternative would eliminate the opportunity for additional industrial space to meet the community's needs. Finally, the Reduced Development Alternative would inadequately satisfy the objective of providing for adequate and appropriate housing for residents and workers since the Alternative would reduce the availability of land for future housing development.

Table 7-7

Project Alternatives Summary Comparison Impacts

Issue	Proposed Project	No Project Alternative	Workforce/Affordable Housing Alternative	Reduced Development Alternative
Aesthetics	Significant Unavoidable (night lighting and visual character/quality)	Similar to project - Significant Unavoidable (night lighting and visual character/quality)	Similar to project - Significant Unavoidable (night lighting and visual character/quality)	Less than project - Significant Unavoidable (night lighting and visual character/quality)
Air Quality	Significant Unavoidable	Similar to project - Significant Unavoidable	Similar to project - Significant Unavoidable	<u>Similar to project</u> - Significant Unavoidable
Biological Resources	Significant and Unavoidable (indirect impact)	Similar to project - Significant and Unavoidable (indirect impact)	Greater than project - Significant and Unavoidable (indirect impact)	Less than project - Significant and Unavoidable (indirect impact)
Geology, Soils, and Minerals	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Public Safety and Hazards	Significant Unavoidable (wildland fires)	Significant Unavoidable (wildland fires)	Significant Unavoidable (wildland fires)	Significant Unavoidable (wildland fires)
Hydrology and Water Quality	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Land Use and Planning	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Noise	Significant Unavoidable (increase in traffic noise levels)	Significant Unavoidable (increase in traffic noise levels)	Significant Unavoidable (increase in traffic noise levels)	Significant Unavoidable (increase in traffic noise levels)
Population, Housing and Employment	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Public Services				
Fire Protection	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Police Protection	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Schools	Less than Significant	Less than Significant	Less than Significant	Less than Significant
Libraries	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable
Roadway Maintenance	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
Hospitals/Health Services	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable

Table 7-7 (Continued)

Project and Alternative Summary Table

Issue	Proposed Project	No Project Alternative	Workforce/Affordable Housing Alternative	Reduced Development Alternative
Public Utilities				
Water	Less than Significant	Greater than project – Significant Unavoidable	Greater than project – Less than Significant	<u>Less than</u> project - Less than Significant
Wastewater	Less than Significant	Less than Significant	Significant Unavoidable	Less than Significant
Solid Waste	Less than Significant	Less than Significant	Significant Unavoidable	Less than Significant
Recreation	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable
Transportation and Circulation	Less than Significant	Greater than project - Less than Significant	Greater than project - Less than Significant	Less than project - Less than Significant
Cultural Resources	Less than Significant	Greater than project – Less than Significant	Less than Significant	Less than Significant

Source: PCR Services Corporation, 2005