14.0 COMMENTS AND RESPONSES

14.0 COMMENTS AND RESPONSES

A. INTRODUCTION

In accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA), the Town of Mammoth Lakes has prepared the Final Subsequent Program Environmental Impact Report (EIR) for the North Village 1999 Specific Plan Amendment.

This Comments and Response section combined with the Draft EIR, which was circulated from August 8, 2000 to September 21, 2000, make up the Final Subsequent Program EIR. Any additional Town recommendations or requirements during the certification process will make up the final components of this EIR.

The following is an excerpt from the CEQA Guidelines, Section 15132:

"The Final EIR shall consist of:

(a) The Draft EIR or a version of the draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency."

This Comments and Responses section includes all of the above required components and shall be attached to the revised Draft EIR to make up the Final EIR. Each comment letter is followed by the corresponding responses. A response is provided for each comment raising significant environmental issues, as received by the Town during the Draft EIR review period. Added or modified text is shaded (example) while deleted text is striked out (~~example~~).

B. LIST OF COMMENTS

1. Sidney F. Tyler, Jr., Resident
2. Tony Chung, LSA Associates, Inc.
3. Marty Larson, Mammoth Lakes Fire Protection District
4. Town of Mammoth Lakes Planning Commission Meeting, September 13, 2000
5. Steven W. Miesel, Resident
6. Dennis Pascua/Les Card, LSA Associates, Inc.
7. Kai Dunn, California Regional Water Quality Control Board
8. Bob Beglau, Resident
9. Ellen Hardebeck, Great Basin Unified Air Pollution Control District
10. Helios at Mammoth, Condominium Homeowners Association
11. Carolyn Caputo, Resident
12. Sandy Hogan, United States Department of Agriculture
13. Eddie P. Ramseyer, Ramseyer and Associates, Inc.
14. Frank C. Hoyt, Mammoth Knolls Homeowners Association
15. Sam Walker and Gary Berger, Residents
16. Elizabeth Tenney, Preserving the Eastern Sierra Tradition of Environmental Responsibility
17. Ed Brisson, Intrawest
18. Pat Eckart, Resident
19. Chuck Tomajko, Resident
20. J.E. Winkler, Resident
21. Steven Miesel, Resident
22. Kenneth Elliott, Resident
23. Gail Lonne, Mammoth Lakes Tennis Club
24. Commentor Unknown
25. Carolyn Yee, Department of Transportation, District 9

STATE OF CALIFORNIA

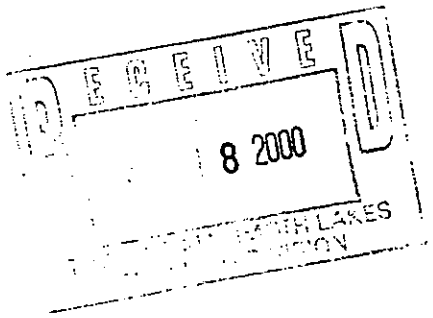
Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
GOVERNOR

Steve Nissen
ACTING DIRECTOR

ACKNOWLEDGEMENT OF RECEIPT



DATE: August 17, 2000

TO: Karen Johnston
Town of Mammoth Lakes
437 Old Mammoth Road
Mammoth Lakes, CA 93546

RE: North Village 1999 Specific Plan Amendment
SCH#: 1999092082

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: August 8, 2000
Review End Date: September 21, 2000

We have distributed your document to the following agencies and departments:

California Highway Patrol
Caltrans, District 9
Department of Conservation
Department of Fish and Game, Region 6 (Inyo & Mono Region)
Department of Forestry and Fire Protection
Department of Housing and Community Development
Department of Parks and Recreation
Department of Toxic Substances Control
Integrated Waste Management Board
Native American Heritage Commission
Regional Water Quality Control Bd., Region 6 (Victorville)
Resources Agency
State Lands Commission
State Water Resources Control Board, Division of Water Rights

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

COMMENT NO. 1

Sidney F. Tyler, Jr.
969 S. Madison Ave.
Pasadena, Calif. 91106
(626) 793-4751 - tel.

RECEIVED
AUG 30 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

To: Town of Mammoth Lakes City Council and Planning Commission
Through Karen Johnston, Senior Planner

Re: **Comments of Revised North Village Specific Plan Amendment dated 8/9/00, and the Draft EIR**

I am a part-time resident with a home in Mammoth Knolls who has attended the three recent public meetings held by the Planning Commission of the Design Guidelines for the North Village Project, and who has read the above documents. I'd appreciate the following comments being incorporated into the record.

1. In General. I am in agreement with all of the objectives and most of the requirements stipulated in the Plan Amendment document. While the scope of the proposed project is daunting (3020 accommodation rooms, 135,000 s.f. of commercial space), it **might be acceptable** a) if the design really does reflect Mammoth's uniquiness.....and NOT what Intrawest has put up in Whistler/Blackcomb, and b) if it does not have adverse environmental impacts on the adjacent neighborhoods. If these conditions cannot be met, the "no-project alternative" in the EIR is the finding you should make.

2. Parking. This is the single most troublesome, or at least the most confusing element of the Plan Amendment and the Draft EIR. On the one hand, the Specific Plan makes it clear (p. 10) that this is to be a pedestrian-oriented development: "A major premise is that the Pedestrian System ultimately establishes the structure of the Village." Additionally, we are told that there will be no day-skier parking, an important statement for a project that is also deemed to be a major portal to the Mammoth Mountain resort. 1A

The key to this concept is an enhanced system of transit, which appears to be the basis for proposed reductions in on-site parking requirements compared to current municipal codes. On-street parking is to be eliminated year-round, and a median barrier on Minaret Road strengthens the pedestrian character. So the idea appears to be a village where the bulk of tourists visit without cars. I wholeheartedly support this. But.....

On the other hand, there are several statements in the Plan that suggest this may not be entirely so:

- Adequate off-street parking will be required for each proposed development within North Village (p. 53)
- Parking will be sufficient to accommodate *potential demand* (italics mine)
- Parking requirements for retail/restaurant will be 3.5 spaces per 1000 s.f. (p. 38). This by itself would translate into a need for some 450 parking spaces.

The apparent conflict cited above is also reflected in the proposed Design Guidelines, which stipulate in the section under "Public Parking" that on-site parking is to be only for guests and residents, as opposed to the language in the introduction which indicates that North Village "will have the capacity to service large numbers of *visitors, residents and tourists* (italics mine).

1A

So the question is, will casual (day and evening) visitors entering North Village in their cars be overtly discouraged from parking there - with appropriate signage, because in fact there will be no parking available? Or are we setting a parking strategy to allow for potentially significant numbers of visitors/tourists who want to use their cars, notwithstanding the enhanced transit system? Or something in between?

It seems to me that even under the most optimistic scenario about the use of transit, a lot of visitors to the Village are going to arrive by car, and they'll need a place to park. Transit alone probably won't be able to deliver the traffic needed to enable commercial tenants to be successful. They are, we should remember, going to be paying relatively high base rents, and perhaps percentage rents on top of that.

Therefore, the pedestrian village idea - that we all seem to like - nonetheless needs an on-site parking structure of at least 400 spaces to serve the commercial tenants of North Village. Somehow this has to be provided without allowing day skiers to use these spaces. And without causing massive traffic congestion, particularly on nearby residential streets.

Finally, since it is clear that the economic benefit of the parking structure redounds to the developer, **it is Intrawest that should bear the financial responsibility for constructing and operating it, NOT the tax-payers of Mammoth Lakes.**

Thank you for your consideration of these comments, and also for the extensive manner in which you have invited public participation in the process.

8/29/02

Response to Comment No. 1

Sidney F. Tyler, Resident
August 29, 2000

1A. The commentor's primary concern relates to parking. Section 5.4 of the Draft EIR addresses proposed parking rates identified in the 1999 Specific Plan Amendment. The analysis concludes that proposed rates would provide adequate parking. It is important to note that overall size and development details are to be defined as North Village develops. In order to ensure that adequate parking is achieved, the EIR has incorporated mitigation recommending a contingency parking plan and/or shared parking analysis in accordance with Town requirements.

Also, in order to ensure that adequate parking is provided during unusual weekend peaks, a contingency parking plan requirement is included in the 1999 Specific Plan Amendment for Resort/Condominium residential units. The contingency parking plan is to demonstrate that 1.2 or more parking spaces are provided per unit through the use of alternative parking approaches. Parking alternatives can be a combination of, but not limited to, tandem parking, valet parking, and shuttle services to a designated off-site parking location. The contingency parking plan will include an implementation plan, and any other related documentation to ensure exceptional peak demands.

COMMENT NO. 2

MEMORANDUM

DATE: August 29, 2000

TO: Ed Brisson, Intrawest Mammoth

FROM: Tony Chung, Ph.D.

SUBJECT: The Village at Mammoth Lakes Noise and Air Quality Study Review

Noise

1. Page 5.6-3. First paragraph under "Day Night Average (Ldn)". The discussion of the maximum noise level (Lmax) and percentile exceedance level (Ln) should not be mixed with the discussion for the day night average noise level (Ldn). **2A**

2. Page 5.6-8. Last paragraph. The noise study referred measurements conducted in April 1995 as during the "winter" season. It should be referred to as during the "spring" season. Otherwise, measurements will need to be conducted between December and February. **2B**

3. Page 5.6-9. Table 5.6-5, Existing Noise Levels. Ambient noise levels shown for measurement location number 6, 29.3 dBA Leq and 29.4 dBA Lmax, are considered too low for a site "Adjacent to Minaret Road at access to Ullr Lodge" starting from 5:20 p.m. According to Table 5.6-1 on page 5.6-2, a soft whisper at 15 feet would generate approximately 30 dBA and light auto traffic at 100 feet would generate 50 dBA, it is not reasonable to have recorded a maximum noise level of 29.4 dBA (Lmax) at a location adjacent to traffic. **2C**

4. Page 5.6-11. First full paragraph after Table 5.6-6. The statement of "existing vehicular generated noise levels along all roadway links modeled are 'well below' the 60 Ldn noise standard with the exception of Main Street east of Minaret Road and Main Street west of Old Mammoth Road" is incorrect. In addition to these two roadway links, four other roadway links have the 60 Ldn extended to between 74 feet and 94 feet from the roadway centerline, and two of them have the noise level at 100 feet from the roadway centerline that is approaching (within 1.2 dBA) the 60 dBA Ldn. **2D**

5. Page 5.6-15. Bottom of the page. The statement of "if no residences are located within 200 feet of the pile driving locations, the Town's maximum noise level threshold is not expected to be exceeded." is not correct unless it is under the "mitigated" condition. At 200 feet, the unmitigated pile driving noise level (as stated in the noise study) would drop to 85 dBA (from 103 dBA). It would drop to 79 dBA at a distance of 400 feet from the pile driving with direct line of sight. For the mitigated condition, the noise level would drop to 77 dBA at 200 feet and 71 dBA at 400 feet. Therefore, for the unmitigated condition, the Town's maximum **2E**

noise level threshold is not expected to be exceeded when no residences are within 400 feet of the pile driving. 2E

6. Page 5.6-16. Under "Mobile Noise Impacts". The reference to the Town's Noise Ordinance in the impact statement is incorrect. It should reference to the Town's "Noise Element" and Title 24 of the California Code of Regulations. 2F

7. Page 5.6-17. Second paragraph. To evaluate the impact of the project (i.e., the 1999 Specific Plan Amendment) on traffic noise levels, the comparison should be between the "Existing Traffic Conditions" and the "Existing Plus 1999 Specific Plan Amendment Conditions" or between the "Existing Plus Approved Project Conditions" and the "Existing Plus Approved Projects Plus 1999 Specific Plan Amendment Conditions." These two comparison scenario would show the "net" increase as a result of the 1999 Specific Plan Amendment. The comparison between the "Existing Traffic Conditions" and the "Existing Plus Approved Projects Plus 1999 Specific Plan Amendment Conditions" would show the difference including contributions from the "Approved Projects" that may overburden the project's impacts. 2G

8. Page 5.6-17. Fifth and sixth paragraphs. The sentence "These increases are considered less than significant as they are below the 3 dBA "just detectable" change." in paragraph 6 is misplaced. It should be moved to paragraph 5, before the last sentence of that paragraph. 2H

9. Page 5.6-18. Table 5.6-8. Similar to comment #7 above, the "change" should have reflected the net difference the project would contribute, not including contributions from the "Approved Project". 2I

9. Pages 5.6-20 and 5.6-21. The reference to "three specific activities must be evaluated" referenced to PA system, outdoor events, and operation of gondola on page 5.6-20. However, on page 5.6-21, discussion about "Adjacent Receptors" which are not considered a "specific activity" remains. No discussion regarding potential noise impacts from the "operation of the gondola" was provided. 2J

10. Page 5.6-22. Under Mitigation Measure 5.6-1c for "Short-Term Construction Noise". The reference to "within 200 feet of existing residential units" needs to be clarified to be under the "mitigated condition" for the pile driving equipment. Otherwise, a reference to 400 feet would be more appropriate. 2K

Air Quality

1. Page 5.5-4. Table 5.5-1. The 1999 air quality data are available from the ARB's website. 2L

2. Page 5.5-6. Under "Summary of Previous Environmental Documentation." It was indicated that "The 1991 EIR also identified construction vehicles and equipment as creating potentially significant short-term hot spot violations of Federal and State CO standards." Although construction vehicles and equipment emit CO, the main concern is normally nitrogen oxides (NO_x) that may react with volatile organic compounds (VOCs) to form 2M

ozone. CO hot spots are not normally anticipated as a result of construction activity. Many air districts do not ever require the quantification of air pollutants during construction. Identification of the construction vehicle related CO emissions as potentially significant hot spots air quality impacts is not reasonable. 2M

3. Page 5.5-10. First paragraph. The statement of "Although adherence to permit conditions would be required, mitigation measures have been recommended in this Section in accordance with the Air Quality Management Plan for the Town of Mammoth Lakes, prepared by the APCD and Town, to 'reduce particulate generation to a less than significant level'" is incorrect. The sentence prior to that statement already indicates that "compliance with conditions of the APCD permit would reduce potential short-term air quality impacts to a less than significant level." Therefore, those recommended measures were to "further reduce the particulate emissions", not to "reduce particulate generation to a less than significant level." 2N

4. Page 5.5-12. Under "Federal Standard Level of Review". The statement of "Because the Federal standard (150 ug/m^3 for PM_{10}) is so much higher than the State (50 ug/m^3 for PM_{10}), meeting the Federal standard for all sources 'would' meet the State standard" is incorrect. It should be the other way around. Meeting the State standards would ensure meeting the Federal standards. However, meeting the Federal standards would "not" guarantee that State standards are met. 2O

Response to Comment No. 2
Tony Chung, LSA Associates, Inc.
August 29, 2000

2A. Page 5.6-3, first paragraph under "Day Night Average (Ldn)" has been revised by moving the "Lmax" discussion into a separate paragraph.

2B. Page 5.6-8, Paragraph 5, Line 5, of the Final EIR has been revised by deleting "winter" and replacing with "spring".

2C. Although the commentor makes a compelling point, the noise reading taken at Minaret Road, adjacent to the access to Ullr Lodge, is an accurate reading at 5:20 p.m. on October 11, 1999.

2D. Page 5.6-11, Paragraph 1, of the Final EIR has been revised to reflect the following:

As indicated in the above Table, existing vehicular generated noise levels along ~~all~~ the majority of roadway links modeled are ~~well~~ below the 60 Ldn noise standard with the exception of Main Street east of Minaret Road (62.5 dBA) and Main Street west of Old Mammoth Road (62.2 dBA). In addition to these two roadway links, four other roadway links have the Ldn extended to between 74 feet and 94 feet from roadway centerline and two of them have the noise level at 100 feet from the roadway centerline that is approaching (within 1.2 dBA) the 60 dBA Ldn.

2E. Page 5.6-15, Paragraph 2, of the Final EIR has been revised to reflect the following:

At 200 feet, the mitigated noise level from pile driving would be 77 dBA and 71 dBA at 400 feet. Both conditions are below the Town's 80 dBA construction noise threshold for Type II land uses. At this time the exact location of pile driving sites has not been confirmed; however, if no residences are located within ~~200~~ 400 feet of the pile driving locations, the Town's maximum noise level threshold is not expected to be exceeded under unmitigated conditions.

2F. Page 5.6-16, Paragraph 3, Line 5, of the Final EIR has been revised by deleting "Ordinance" and replacing with "Element".

2G. The noise analysis evaluated "Existing Traffic Conditions" compared to "Existing Plus Approved Projects Plus 1999 Specific Plan Amendment Conditions" to determine the project's vehicular noise impacts. Comparison of these two scenarios were conducted to provide a worst case scenario. As indicated in Table 5.6-8, *60 Ldn Noise Projections*, the analysis demonstrated that traffic volumes under "Existing Traffic Conditions"

compared to traffic volumes under "Existing Plus Approved Projects Plus 1999 Specific Plan Amendment Conditions" results in less than significant vehicular noise impacts.

A comparison of "Existing Plus 1999 Specific Plan Conditions" to "Existing Plus Approved Projects Plus 1999 Specific Plan Amendment Conditions" as recommended by the commentor would show the "net" increase as a result of the project as opposed to a worst case analysis. The commentor is correct, as an evaluation of these two scenarios would result in a lower net change in the project's vehicular noise contribution. However, since less than significant noise impacts were identified utilizing the worst case analysis contained within the noise study, any conclusions rendered by a comparison and analysis proposed by the commentor would remain less than significant as well.

2H. Page 5.6-17, Paragraph 6, Line 1, of the Final EIR has been moved to the end of Paragraph 5. Also, refer to Response under 2G, above.

2I. Refer to Response to Comment No. 2G, above.

2J. While not considered a specific activity, potential stationary noise impacts to adjacent sensitive receptors has been provided within the analysis. Page 5.6-21 of the Final EIR has been modified to include the following discussion:

Gondola

The proposed gondola facility would be operated by electrical power and will have an emergency diesel back up engine. Anticipated noise associated with the gondola operations would be below ambient noise levels at sensitive receptors and therefore result in less than significant noise impacts. Operation of the gondola would also be limited to the hours of 7:00 a.m. to 10:00 p.m. pursuant to Chapter 18.6 of the Town's Noise Ordinance.

2K. Page 5.6-22, Mitigation Measure 5.6-1c, of the Final EIR has been modified to reflect 400 feet.

2L. The data presented in Table 5.5-1 is based upon available information at the time of Draft EIR publication. The California Air Resources Board web site was contacted on October 9, 2000 and 1999 data was still not available.

2M. Comment is noted and will be considered by the Town of Mammoth Lakes.

2N. Page 5.5-10, Paragraph 1, Line 3, has been revised as follows:

Although adherence to permit conditions would be required, mitigation measures have been recommended in this Section in accordance with the *Air Quality Management Plan for the Town of Mammoth Lakes*, prepared by the APCD and Town, to ~~reduce~~ assure the reduction of particulate generation to a less than significant level.

2O. Page 5.5-12, Paragraph 2, of the Final EIR is revised as follows:

Because the ~~Federal~~ State standard is so much higher than the ~~State~~ Federal, meeting the ~~Federal~~ State standard for all sources would meet the ~~State~~ Federal standard. The following discusses impacts to vehicle miles traveled (VMT) which is shown below to exceed the ~~Federal~~ State standard.

Mammoth Lakes Fire Protection District
PO Box 5
Mammoth Lakes, CA 93546
(760)934-2300
Fire Prevention Bureau

9-12-00

Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes, CA 93546

Attn. Karen Johnston

Re. Subsequent Program Environmental Impact Report for the North Village 1999 Specific Plan Amendment

Dear Ms. Johnston:

I have reviewed the submitted documents with the following comments:

2.0 Executive Summary

5.9-2i: The Fire District does not have a mechanism in place that would allow for the open burning on site of slash and debris. **3A**

3.0 Project Description

Table 3-2 indicates potential increases to building heights. The Fire District imposes high-rise requirements on all buildings that have floor levels located more than 55-feet above the lowest level of fire department vehicle access. Floor level is identified as the floor level of highest level of human occupancy. Through application, there are specific requirements for fire protection, detection, and communication systems, exiting requirements, and ventilation requirements. These requirements may be imposed dependent upon project submittal. **3B**

3.6: Add Mammoth Lakes Fire Protection District to the "other agencies" list. **3C**

The District reserves the right to impose additional requirements upon further submission of project details and plans.

Sincerely,

Marty Larson
Assistant Chief/ Fire Marshal

RECEIVED
SEP 18 2000
TOWN OF MAMMOTH LAKES
PLANNING DIVISION

Response to Comment No. 3

Marty Larson, Mammoth Lakes Fire Protection Service
September 12, 2000

3A. Mitigation Measure 5.9-2i has been modified in the Final EIR as follows:

Slash generated from construction or thinning operations shall be ~~piled and burned, chipped, or~~ hauled from the site concurrent with the operation to prevent a breeding site for IPS. Logs shall be removed from the site as soon as possible.

3B. Comment is noted and will be considered by the Town of Mammoth Lakes.

3C. The Mammoth Lakes Fire Protection District has been added to the listing in Section 3.6 of the Final EIR which identifies approvals from other agencies.

TOWN OF MAMMOTH LAKES PLANNING COMMISSION
Regular Meeting of September 13, 2000
Second Floor, Suite Z
Minaret Village Shopping Center
437 Old Mammoth Road

COMMENT NO. 4

MINUTES

I. CALL TO ORDER

The regular meeting was called to order at 9:02 a.m.

II. ROLL CALL

Present were Commissioners Telliano, Thompson, Vice Chair Harvey and Chairman Saari. Commissioner Somers arrived at 9:10 a.m. and did not vote on the minutes or the consent agenda. Also present were Karen Johnston, Senior Planner; Dave Hickson, Associate Planner; Craig Olson, Associate Planner; Jeff Mitchell, Town Engineer; and Tina Bohannan, Administrative Secretary.

III. COMMENTS FROM THE PUBLIC

None.

IV. APPROVAL OF MINUTES

1. Minutes of Special Adjourned Meeting of August 21, 2000
2. Minutes of Special Adjourned Meeting of August 22, 2000
3. Minutes of Regular Meeting of August 23, 2000

Action: It was moved by Commissioner Thompson, seconded by Vice Chair Harvey and carried by a 3-0-1 vote with Commissioner Telliano abstaining to approve the minutes of August 21, August 22 and August 23, 2000 as presented

V. CONSENT AGENDA

1. Final Tract Map 36-196, L'Abri Condominiums, Hartigan/Foley Construction

Action: It was moved by Commissioner Telliano, seconded by Vice Chair Harvey and unanimously carried to approve the consent calendar as submitted.

VI. PUBLIC HEARINGS

1. Public Comments on the Draft Subsequent Program EIR for the North Village Specific Plan Amendment. (Staff contact: Karen Johnston, x228)

Senior Planner Karen Johnston gave a brief introduction. She explained the differences between a Program EIR and a Subsequent EIR.

The public hearing was opened.

Sam Walker, local, asked about the amended Specific Plan and asked if it affects other property owners besides Intrawest.

Senior Planner Johnston responded that it could affect other property owners but mostly by changes to programs like affordable housing, transportation improvements, use of property, etc. She said that the applicant is preparing a red-lined version of the amended Specific Plan that will show the changes.

Pat Eckart, local, presented comments and concerns that she had compiled after spending many hours evaluating the various plans. She said her conclusion at this time would be the Reduced Density Alternative as outlined in the EIR. She said several of her main concerns were with inconsistent language regarding a transit system, availability of day skier parking and reduced air quality standards. She said there are many inconsistencies with their Specific Plan and the Town's General Plan. She said she will be submitting written comments with a recommendation for Alternative "D". **4A**

Senior Planner Johnston responded to her comments. She said as an outcome of the Traffic Study, North Village is not required to provide a year-round transit system. She said it has to do with the density that Intrawest is proposing for the their development throughout the town. She said this does not create the traffic impacts that were expected. She said the Town can require them through a mitigation measure to contribute to a transit system; Mammoth Mountain will be required to contribute a significant amount to a townwide transit system run by the Town. She spoke about choosing a Level of Service which brings the quality of life into play.

Bob Beglau, local, expressed his concern with the proposed parking garage on the tennis court site. He said it will create noise, traffic, affect air quality, the height of the structure could shadow his land and affect the resale of his property. Recommends that it be placed elsewhere; preferably near the base of a ski run. **4B**

Senior Planner Johnston responded that the location of this garage is only a proposal at this time. She said staff is looking into the impacts of parking garages in general.

Ed Brisson, Intrawest, reiterated that the parking garage is only a proposal and is not finalized. He said the proposal was for an underground garage, not an above-ground structure. He reported that a red-lined version of the amended Specific Plan will be delivered to the Town Offices today.

Sam Walker asked if a letter could be sent out to affected property owners informing them of the changes being proposed.

Senior Planner Johnston responded that staff would handle this request.

Steve Meisel, local, spoke about the housing issue. He inquired about the deadline for comments and asked if he could request an extension on the comment period until after a decision is made by the Council regarding the Housing Ordinance. He also commented on the amount of employee housing that could potentially be placed in The Village.

4C

Senior Planner Johnston explained that the North Village Specific Plan has its own proposed housing program and it does not have to be the same as the rest of the town. She said it is similar to the proposal that is being considered by Council but it does not need to be consistent. She explained the time frame for the approval process on the EIR, Specific Plan, and Phase 1 of the Village.

There was discussion about roof heights.

The public hearing was closed.

At the conclusion of the public hearing, the Commission took no action.

VII. BUSINESS MATTERS

1. Design Review 2000-21, initiated by Phillip Cardan/JSA Architecture, for a proposed 3,518 square foot single family residence within the Bluffs Subdivision located at 465 Le Verne Street. APN: 22-393-49 (Staff contact: Craig Olson, x269)

Associate Planner Craig Olson reported that the applicant has requested a continuance to the next regular meeting.

Chairman Saari said that this item will be continued to the September 27, 2000 meeting.

2. Discussion of Sign Regulations (Staff contact: Dave Hickson, x251)

Associate Planner Hickson asked for clarification regarding the Commission's wishes regarding review of freestanding signs; he also asked for comments, concerns or inconsistencies regarding the Sign Regulations in the Design Review Manual and the Sign Ordinance.

The Commission's consensus was to review the entire Sign Ordinance and the Sign Regulations in the Design Review Manual.

Response to Comment No. 4

Town of Mammoth Lakes Planning Commission
September 13, 2000

4A. Pursuant to Mammoth Lakes Senior Planner Karen Johnston's remarks during the September 13, 2000 Planning Commission Hearing, based upon the project Traffic Study, North Village is not required to provide a year-round transit system. The Town requires the applicant through a mitigation measure to participate on a fair share basis to the community wide transit system to achieve the ridership levels assumed in the MTM.

4B. No significant impacts have been identified for the proposed parking garage at the tennis court site. In addition, it is noted that the subject EIR is a Program Level EIR, intended as the first tier of review for the 1999 Specific Plan Amendment. As individual project components are submitted to the Town for design/development review, additional analysis may be required by the Town pursuant to Sections 15162 and 15168 of CEQA. Refer to Section 1.0 of the Final EIR for additional discussion.

4C. As stated by Mammoth Lakes Senior Planner Karen Johnston during the September 13, 2000 Planning Commission Hearing, the North Village Specific Plan Amendment has its own housing program which is not required to be the same as the housing programs elsewhere in the Town.

Other comments cited during the Public Hearing were not in regard to the Draft EIR, thus no further response is required.

9-13-2000

COMMENT NO. 5

Steve Miesel
P.O. Box 7383
Mammoth Lakes, CA 93546

Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Dear Town of Mammoth Lakes,

The following are comments relating to housing provided as mitigation on the Draft Environmental Impact Report for the North Village Specific Plan hereafter revered to as the DEIR:

Comments 1, 2, and 3 pertain to the statement on page 5.2-19; "It was determined by the Town that housing should be provided for 58.5 percent of the FTEE's generated by new development.

1. The Town does not determine that housing should be provided for 58.5 percent of the FTEE's generated by new development as stated on 5.2-19. **5A**

2. It is determination by the Town that "North Village is required to provide housing in an amount and type equal to its employee generation. A minimum of 50 % of that housing must be within the project area." This determination is from page 10 of the Housing Element and from the North Village Specific Plan 1994 and overrides the determination of a Zoning Code Amendment. **5B**

3. Providing housing in amount and type of any less than " the amount and type equal to equal to its employee generation" as stated on page 10 of the Towns housing element contradicts policy 4.C. of the housing element. **5C**

Comments 4,5, and 6 pertain to the sentences on page 5.2-21 of the DEIS, "The Specific Plan Amendment proposes to locate at least half of the units in Resort or Specific Plan zoned properties and no more than half in zones other than RMF-1.

4. This is inconsistent with requirement stated on page 10 of the Housing Element pertaining to North Village. **5D**

5. This would lead to the undesirable concentration of affordable housing in the Resort Zone. It is more desirable to have the affordable housing dispersed. **5E**

6. This subjects existing rental apartment in zones other than RMF-1 to a higher probability of being acquired, converted to condominium, and ultimately used as housing for mitigation measures. This is not fair to those living in apartments in zones other than RMF-1. **5F**

More written comments are to follow.

Truly,

Steven W. Miesel

Response to Comment No. 5

Steven W. Miesel, Resident
September 13, 2000

5A. The Town in both the draft and adopted housing policies did identify 58.5% as the ratio of bedrooms to FTEE's that mitigates the impact of new development.

5B. The language on Page 10 of the Housing Element is not a policy or a requirement, it is a description of the 1991 North Village Plan as it relates to the availability of suitable sites for housing.

5C. Policy 4.C. of the Housing Element directs that new major projects not have an adverse impact on the Town's housing supply. An adverse impact on the Town's housing supply has been defined by the Town as that percentage of the new workforce making the median household income or less.

5D. Refer to Response to Comment No. 5C.

5E. Permitting housing within the Resort Zone, adjacent to golf courses and resort condominiums, is dispersing it.

5F. Condominium conversions require mitigation. Conversions will be dealt with separately.

LSA

LSA ASSOCIATES, INC.
ONE PARK PLAZA, SUITE 500
IRVINE, CALIFORNIA 92614

949.553.0666 TEL
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OTHER OFFICES:
BERKELEY
FT. RICHMOND
RIVERSIDE
ROCKLIN

COMMENT NO. 6

MEMORANDUM

DATE: September 15, 2000

TO: Ed Brisson

FROM: Dennis Pascua/Les Card

SUBJECT: Review of North Village Traffic/Circulation EIR Section

LSA Associates, Inc. (LSA) has reviewed the August 4, 2000, version of the Traffic/Circulation section of the North Village 1999 Specific Plan Amendment Subsequent Program EIR prepared by RBF Consulting. The purpose of this review was to ensure consistency between the current EIR and the July 25, 2000, versions of the North Village Specific Plan Existing Plus Project and Intrawest Master Plan Traffic Impact Analyses (TIA).

Based on our review, we have provided the following comments. Our comments involve minor revisions (i.e., graphic and tabular changes; and additional text discussions) and do not significantly change the findings of the traffic analysis and EIR section.

COMMENT 1

Exhibit 5.4-7. This exhibit should be revised to match Figure 9 (updated February 8, 2000) of the North Village Specific Plan Existing Plus Project TIA. Figure 9 of the TIA is attached. **6A**

COMMENT 2

Exhibit 5.4-10. This exhibit should be revised to match Figure 12 (updated March 2, 2000) of the North Village Specific Plan Existing Plus Project TIA. Figure 12 of the TIA is attached. **6B**

COMMENT 3

Table 5.4-9. This table should be revised to match Table J (updated February 29, 2000) of the North Village Specific Plan Existing Plus Project TIA. Table J of the TIA is attached. The source footnoted on Table 5.4-9 is incorrect since the volumes reported do not match the volumes from the corresponding table in the July 25, 2000, TIA (Table J). **6C**

COMMENT 4

Page 5.4-39. The following text is recommended as additional language following the first paragraph on page 5.4-39. The text is from pages 40 and 41 of the Mitigation Measures section of the North Village Specific Plan Existing Plus Project TIA (attached). **6D**

"At the intersection of Forest Trail and Main Street, a traffic signal is recommended as mitigation in the EIR; however, such an installation is not recommended at this time since it would have the potential to contribute to an increase of non-residential, cut-through traffic on Forest Trail. It should be noted that the addition of Intrawest North Village (only) traffic does not trigger the average vehicle delay impact."

6D

Table 5.4-18 and Table 5.4-19. Similar to our comment for Mitigation Measure 5.4-1c (above), the following language should be added as a footnote to these tables.

"A traffic signal is not recommended at this time since installation of a traffic signal would have the potential to contribute to the increase of non-residential, cut-through traffic on Forest Trail. The addition of Intrawest North Village (only) traffic does not trigger the average vehicle delay impact."

COMMENT 5

Mitigation Measure 5.4-2o. This mitigation measure should be removed from the EIR. As a result of a thorough alternate route analysis conducted by LSA and described on pages 33 and 36 (attached) of the Intrawest Master Plan TIA, alternate routes are available for delayed traffic on Azimuth Drive. The following is from the TIA:

". . .Alternate routes are available in the immediate area for delayed vehicle traffic on Azimuth Drive . . . These trips would utilize these routes, through unsignalized intersections, to access the major Town thoroughfares such as Minaret Road, Old Mammoth Road, and Main Street . . . With the potential for traffic diversion on Azimuth Drive, the peak hour LOS at its intersection with Meridian Boulevard would be a satisfactory LOS D (22.9 seconds/vehicle) . . . These diverted traffic volumes are relatively low when compared to the overall traffic volumes at the intersection's major roadways (i.e., an average of less than one vehicle per minute in the peak hour) . . ."

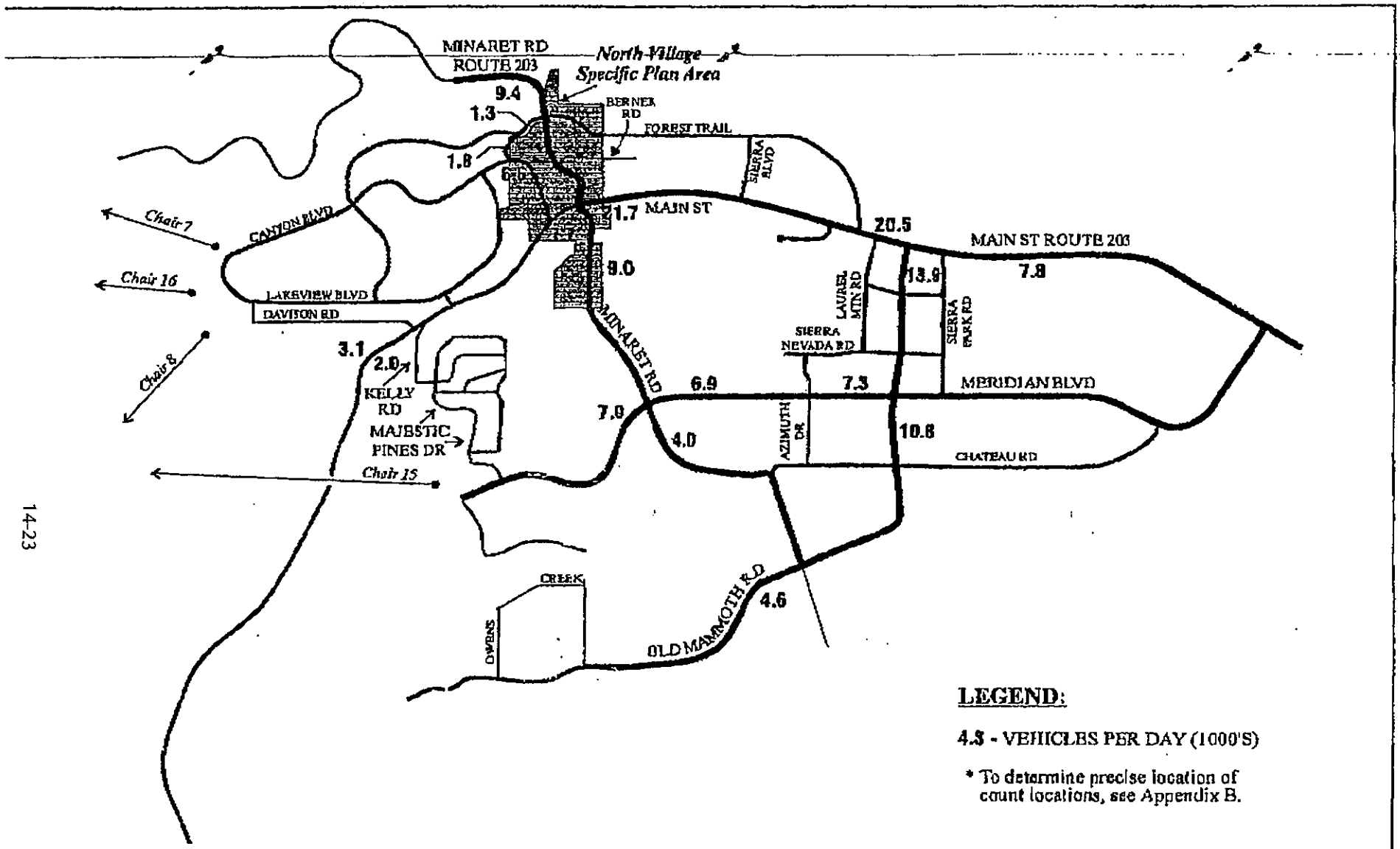
6E

Based on this analysis, a deficiency at Azimuth Drive/Meridian Boulevard would not occur since alternate routes would be available for delayed vehicles. A traffic signal would not be warranted; therefore, no mitigation measures would be required at this location.

Table 5.4-19. Per our comment to Mitigation Measure 5.4-2o (above), the reference for a mitigation measure at the Azimuth Drive/Meridian Boulevard intersection should be removed from the table.

Attachments: Figure 9 of the North Village Specific Plan Existing Plus Project TIA
Figure 12 of the North Village Specific Plan Existing Plus Project TIA
Table J of the North Village Specific Plan Existing Plus Project TIA
Pages 40 and 41 of the North Village Specific Plan Existing Plus Project TIA
Pages 33 and 36 of the Intrawest Master Plan TIA

Sep-15-00 01:45pm From 9495580/67/6094400 Page 5 T-863 P.34/40 F-393



Source: RKJK

1/2/00(INT732)

N

LSA No Scale

Figure 12

Existing Plus Approved Projects Plus North Village
Typical Winter Saturday Roadway Segment Traffic Volumes

Table J - Typical Winter Saturday Existing Plus Approved Projects Plus Project Roadway Level of Service Analysis

Roadway Segment	# Lanes	Capacity	Existing + Approved Projects Volume	V/C	LOS	Existing + Approved + Project Volume	V/C	LOS
Forest Trail w/o Minaret Road	2U	11,700	1,080	0.09	A	1,310	0.11	A
Canyon Boulevard e/o Lakeview Drive	2U	11,700	5,800	0.50	A	6,570	0.56	A
Lake Mary Road w/o Davison Street	2U	11,700	2,800	0.24	A	3,110	0.27	A
Lake Mary Road w/o Miller Siding	2U	11,700	7,400	0.63	B	7,710	0.66	B
Main Street e/o Minaret Road	4U	22,500	16,800	0.75	C	21,730	0.97	E
Main Street w/o Old Mammoth Road	4D	33,800	16,600	0.49	A	20,450	0.61	B
Main Street e/o Sierra Park Road	4D	33,800	6,300	0.19	A	7,840	0.23	A
Meridian Boulevard w/o Minaret Road	4U	22,500	5,800	0.26	A	7,030	0.31	A
Meridian Boulevard e/o Minaret Road	4U	22,500	5,800	0.26	A	6,880	0.31	A
Meridian Boulevard w/o Old Mammoth Road	4U	22,500	6,800	0.30	A	7,260	0.32	A
Old Mammoth Road w/o Minaret Road	2U	11,700	4,300	0.37	A	4,610	0.39	A
Kelly Road s/o Lake Mary Road	2U	11,700	2,000	0.17	A	2,000	0.17	A
Minaret Road n/o Mammoth Knolls Drive	2U	11,700	7,700	0.66	B	9,400	0.80	D
Minaret Road s/o Lake Mary Road/Main Street	2U	11,700	5,800	0.50	A	9,040	0.77	C
Minaret Road s/o Meridian Boulevard	2U	11,700	3,000	0.26	A	4,080	0.35	A
Old Mammoth Road s/o Main Street	2D	16,200	11,900	0.73	C	13,900	0.86	D
Old Mammoth Road s/o Meridian Boulevard	2D	16,200	9,600	0.59	A	10,830	0.67	B
Hillside Drive n/o Canyon Boulevard	2U	11,700	500	0.04	A	1,800	0.15	A

Notes:
# Lanes refers total number roadway segment lanes regardless of direction.
Capacity = Number of vehicles on all lanes, both directions, per average day.
V/C = Volume-to-Capacity ratio.

Proposed Master Transportation Plan

Daily Person Trip Generation (Intrawest Areas)

Table D also presents the daily person trip generation for the Intrawest Master Plan project. The trip generation rates were based on trip table developed for the MTM. Based on the trip rates in the MTM, build out of the Intrawest Master Plan areas is estimated to generate approximately 50,000 daily person trips. This represents a 25 percent reduction in person trip generation from the Intrawest areas.

In addition to the land use refinements to the MTM as a result of separating the Intrawest land uses from other land uses within a MTM TAZ, Town staff has also performed a detailed review of other land uses not directly related to the Intrawest projects. Table G summarizes these changes to the land uses not directly related to the Intrawest projects.

Traffic Volumes and Level of Service

As previously mentioned, Figures 10 and 12 illustrate the Master Plan's daily and peak hour traffic volumes, respectively. Tables E and F present the results of the Intrawest Master Plan roadway segment and intersection LOS analysis for typical winter Saturday conditions. The v/c ratios and LOS values are based on the existing geometrics at each location. The LOS worksheets are provided in Appendix C, and the Master Plan volumes are presented in Appendix D which represent maximum, not typical, winter Saturday conditions. 6E

Review of the volumes indicates that no Master Plan project traffic has been assigned to Forest Trail, west of Hillside Drive and east of Berner Road. This is due in part to the traffic monitoring plans developed for Forest Trail and Minaret Road, which to have been included in the project's design to ensure adequate and efficient traffic flow on Forest Trail, adjacent to the Specific Plan area. With the initiation of these monitoring plans, and the implementation of their proposed measures (if needed), the residential areas along Forest Trail would not be significantly impacted by traffic generated by MMSA and/or the proposed Gondola Village development.

Table F also indicates the levels of service for the four additional study area intersections (intersections 13 through 16) requested to be analyzed by Town staff. Because these intersections were not analyzed in the Redevelopment Plan, impacts to these intersections associated with the change in Intrawest land uses cannot be compared. Two of the intersections, Old Mammoth Road/Chateau Road and Berner Road/Forest Trail, will not require any mitigation.

The Azimuth Drive/Meridian Boulevard intersection analysis suggests that the minor street (Azimuth) will have excessive delays. Alternate routes are available in the immediate area for delayed vehicle traffic on Azimuth Drive. These routes consist of Sierra Nevada Road to the north, with connections to Laurel Mountain Road and Old Mammoth Road; and Chateau road to the south, with connections to Minaret Road and Old Mammoth Road. Based on review of the forecast delayed vehicles on Azimuth Drive and the peak hour volumes of adjacent study area intersections, a 40

percent diversion in total north-south (Azimuth Drive) peak hour traffic volumes was assumed to occur. The peak hour trips on Azimuth Drive (58 vehicles north of Meridian Boulevard, and 112 vehicles south of Meridian Drive) were diverted north to Sierra Nevada Road and south to Chateau Road. These trips would utilize these routes, through unsignalized intersections, to access the major Town thoroughfares such as Minaret Road, Old Mammoth Road, and Main Street.

With the potential for traffic diversion on Azimuth Drive, the peak hour LOS at its intersection with Meridian Boulevard would be a satisfactory LOS D (22.9 seconds/vehicle). With Azimuth traffic diverted to the adjacent study area intersection of Old Mammoth Road/Chateau Road (62 vehicles), the intersection would continue to operate with satisfactory levels of service (from LOS A, at 1.6 seconds delay per vehicle, to LOS C, at 18.8 seconds delay per vehicle). The LOS worksheets are contained in Appendix C. The three other unsignalized intersections that diverted Azimuth Drive traffic would utilize to access major thoroughfares would be Laurel Mountain Road/Main Street, Old Mammoth Road/Sierra Nevada Road, and Minaret Road/Chateau Road. These non-study area intersections were not modeled in the Master Plan traffic analysis, and therefore no quantifiable intersection impact analysis could be completed.

Based on a diversion analysis conducted by LSA, approximately 16 vehicles would be diverted to Laurel Mountain Drive/Main Street; 42 vehicles would be diverted to Old Mammoth Road/Sierra Nevada Road; and 50 vehicles would be diverted to Minaret Road/Chateau Road. These diverted traffic volumes are relatively low when compared to the overall traffic volumes at the intersection's major roadways (i.e., an average of less than one vehicle per minute in the peak hour). In addition, all 50 vehicles diverted to Minaret Road/Chateau Road would be non-critical, westbound right turning vehicles. 6E

The last intersection is Sierra Park Road/Meridian Boulevard, which was not modeled in the traffic impact analysis. This location will not experience Saturday peak hour deficiencies because the primary traffic generators in the vicinity are schools. A traffic signal for this location is included in the Development Impact Fee program.

As shown in Table E, all of the study area roadway segments are forecast to operate at satisfactory levels of service (LOS A to LOS D) with existing geometrics, with the exception of Old Mammoth Road south of Meridian Boulevard. This roadway segment is forecast to operate at LOS E (0.93 v/c). However, the following analysis procedure has been indicated by Town staff in a June 26, 1998, memorandum from RKJK:

> *Worse than LOS D daily conditions will be deemed acceptable, if all intersections along such a roadway segment are demonstrated to operate at acceptable (LOS D or better) levels of service for typical winter Saturday p.m. peak hour conditions, or other time frames as deemed necessary by the Town.*

According to this procedure, the roadway segment LOS on Old Mammoth Road south of Meridian Boulevard would be considered acceptable. The intersections of Old Mammoth Road/Meridian Boulevard, Old Mammoth Road/Chateau Road, and a typical driveway in between are forecast to operate at LOS D or better. LSA conducted an analysis of Old Mammoth Road/Chateau Road and a typical driveway along Old Mammoth Road, between Meridian Boulevard and Chateau Road. This

As part of the North Village Specific Plan, the Gondola Village development will construct a roundabout at the Minaret Road/Forest Trail intersection, which will result in LOS C (15.5 seconds delay) and LOS B (14.9 seconds delay) in the a.m. and p.m. peak hours, respectively (see Appendix A for roundabout levels of service calculations).

Winter Transit

The Town of Mammoth Lakes' current policy is to encourage transit, pedestrian, and bicycle transportation, and to discourage vehicular transportation. Transportation Demand Management (TDM) requirements, including participation in developing and maintaining a transit system, have been assumed as an integral component of the Specific Plan, to mitigate vehicular impacts that lead to street improvements and signalization, and reduce PM_{10} particulate matter in the Town. The Regional Transportation Plan (December, 1992) adopted by the Local Transportation Commission, the Mammoth Lakes Trail System Plan (May, 1991) adopted by the Town Council, the Transit Design Study (June, 1993) adopted by the Town Council, and the Main Street Promenade and Transportation forecasting Model/Multi-modal Transportation Plan approved by the Town of Mammoth Lakes, support the goal of the Town to concentrate efforts on non-vehicular oriented transportation modes. To this end, a mitigation measure for all new development is to participate, on a fair share basis, in the development and operation of a communitywide transit system accomplishing the ridership levels incorporated in the MTM.

6E

MITIGATION MEASURES

Table K indicates that 2 of the 12 study area intersections are forecast to operate with unsatisfactory levels of service, with existing geometrics and the approved Juniper Springs development signal improvement at Old Mammoth Road/Main Street. The following discusses project impacts on the study area intersections, and the mitigation measures required to bring intersection operations to satisfactory levels of service. It should be noted that the following mitigation measures only reflect short-term circulation requirements. Circulation impacts for the Town's build out conditions are addressed in a separate traffic impact analysis (i.e., Intrawest Master Plan Traffic Impact Analysis, LSA, December, 1999).

- *Minaret Road/Lake Mary Road-Main Street.* This signalized intersection is forecast to operate at LOS F (1.14 v/c) with development of the North Village in the existing plus approved projects plus project condition. To improve intersection levels of service, the Gondola Village development will construct a second (dual) southbound left turn lane. Intersection levels of service with this improvement are forecast to improve to LOS D (0.89 v/c) in the p.m. peak hour.

- *Forest Trail/Main Street.* With development of the North Village, this unsignalized intersection is forecast to operate at LOS F (>45 second average vehicle delay) in the p.m. peak hour. A traffic signal could mitigate this impact, however it is not recommended since it has the potential to contribute to the increase of non-residential, cut-through traffic on Forest Trail. Although improvements for the Forest Trail/Main Street intersection are not recommended at

this time, installation of a traffic signal as a potential mitigation measure is consistent with the Town of Mammoth Lakes' Developer Impact Fee (DIF) program, Project #TC-05, and the payment of DIF fees is appropriate mitigation. It should be noted that the addition of Intrawest North Village traffic does not trigger this average delay impact.

- *Old Mammoth Road/Main Street.* As part of the Juniper Springs development approval, a fair share of the protected right turn phase for eastbound right turning vehicles at the Old Mammoth Road/Main Street intersection is required. This traffic signal improvement is to be installed in the summer of 2000. Since North Village traffic also contributes to this need, a fair share contribution is appropriate. The Gondola Village portion of this fair share is approximately 35 percent of the total mitigation cost ($9,735) or $3,407. **6E**

- *Winter Transit.* As previously discussed, the Town of Mammoth Lakes' current policy is to encourage transit, pedestrian, and bicycle transportation, and to discourage vehicular transportation. To this end, a mitigation measure for all new development is to participate, on a fair share basis, in the development and operation of a communitywide transit system accomplishing the ridership levels incorporated in the MTM.

Response to Comment No. 6

Dennis Pascua/Les Card, LSA Associates, Inc.
September 15, 2000

6A. Exhibit 5.4-7 will be updated for the Final EIR.

6B. Exhibit 5.4-10 will be updated for the Final EIR.

6C. Table 5.4-9 will be updated for the Final EIR. The source cited in Table 5.4-9 will be corrected for the Final EIR.

6D. Comment is noted by the Town of Mammoth Lakes. Based upon the analysis conducted, the timing information referenced is project specific and is not appropriate for inclusion. Timing will be determined by the Town of Mammoth Lakes when warrants are met as each project comes on line.

6E. Based on the traffic analysis in the Draft EIR, Mitigation Measure 5.4-2o will remain in the Final EIR. In addition, Mitigation Measure 5.4-2o has been clarified as follows:

5.4-2o (*New Mitigation Measure*): Install a traffic signal at the Azimuth Drive/Meridian Boulevard intersection ~~to satisfy~~ when warranted in accordance with Caltrans Signal Warrant ~~assuming the proposed 1999 Specific Plan Amendment~~ analysis methodology or other measure designed to achieve an acceptable LOS (LOS D or better) at the Azimuth Drive/Meridian Boulevard intersection.

California Regional Water Quality Control Board
Lahontan Region

Winston H. Hickox
Secretary for Environmental Protection

Victorville Office
Internet Address: http://www.swrcb.ca.gov/rwqcb6
15428 Civic Drive, Suite 100, Victorville, California 92392
Phone (760) 241-6583 • FAX (760) 241-7308

Gray Davis
Governor

COMMENT NO. 7

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH LAKES
PLANNING DIVISION

September 15, 2000

Karen Johnston
Town of Mammoth Lakes
Community Development Department
P.O. Box 1609
Mammoth Lakes, CA 93546

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE NORTH VILLAGE PLAN AMENDMENT, MAMMOTH LAKES, MONO COUNTY

Thank you for the opportunity to review the draft environmental impact report (DEIR) entitled "Subsequent Program Environmental Impact Report for the North Village Specific Plan Amendment" dated August 4, 2000. The proposed project includes development of a resort including lodging, commercial and residential uses on 64.1 acres within the Town of Mammoth Lakes. The Village will be built on the west side of Minaret Road and will include Canyon Blvd. The Regional Water Quality Control Board staff (Board staff) has reviewed the DEIR and has the following comments.

GENERAL COMMENTS

1. The quality of surface runoff could be degraded as a result of increased erosion from construction activities or additional impermeable surfaces crested due to project construction. We request that erosion control requirements be implemented and meet the Regional Board's Erosion and Sedimentation Control Guidelines while construction is being undertaken and during project operation. **7A**

2. The DEIR mentions that the proposed project will require a National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges. As part of the NPDES permit, the project proponent is required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must contain the information listed in the General Permit. The SWPPP is subject to review by the Regional Board. The Regional Board will require submittal of grading/drainage and erosion control plans as part of the SWPPP. In accordance with Section B of the General Permit, Board staff will require the project proponent to develop and implement a monitoring program (sampling and analysis) for purposes of assessing compliance with the General Permit. The monitoring and reporting program shall be included in the SWPPP. The project proponent may contact the Board staff to discuss the required contents of the SWPPP. **7B**

Recycled Paper

3. During construction, dewatering water cannot be discharged into any drainage, stream or wetlands area without first obtaining a discharge permit from Regional Board, as the dewatering water has the potential to contain pollutants. We recommend dewatering water be discharged to land if a suitable land location exists. Dewatering water must be contained and not cause a nuisance. 7C

4. If construction activities involve the crossing and/or alternation of a stream channel, this type of work requires a Federal permit (Dredge and fill permits from the U.S. Army Corps of Engineers). Before a Federal permit can be issued, the applicant must obtain Federal Clean Water Act Section 401 Water Quality Certification from the State. The application is available through the Regional Board web-site (http://www.swrcb.ca.gov/rwqcb6) or by calling the Victorville office. 7D

5. The DEIR states that there are no wetlands on the subject parcel. Please provide reference to the study or other signed document that delineates no wetlands existed on the proposed project area and potentially disturbed areas. 7E

6. Board staff requests the project proponent prepare a site plan showing the construction area, existing streams, surface and subsurface (storm drains) drainages, and proposed stormwater control facilities (both temporary and permanent). Please provide sampling locations in stormwater collection facilities to allow for potential sampling of stormwater quality and describe who will be responsible for maintaining stormwater collection and disposal facilities during construction and after completion. 7F

SPECIFIC COMMENTS

1. Page 3-34, under "Agreement, Permits and Approvals", the EIR should include more detailed information related to potential permit applications to different agencies. A table should be included as below: 7G

AGENCY	AREA OF RESPONSIBILITY	PERMIT ISSUED
State Water Resources Control Board (issuing agency)	Stormwater – Soil Disturbance and Erosion Control – Construction Phase	General NPDES Permit for Construction Activities with Greater than Five Acres of Disturbance.
U.S. Army Corps of Engineers (Corps)	Wetland	Clean Water Act Section 404 Permit.
Lahontan Regional Water Quality Control Board	Wetland	Clean Water Act Section 401 Water Quality Certification.

2. Page 5.8-21, Impacts on Drainage and Runoff. The DEIR states "*The uncontrolled runoff accelerates erosion, thereby, increasing sediment loads and creating water quality impacts to water courses such as Mammoth Creek.*" Please specify the potential source of uncontrolled runoff generated from construction activities, and describe how these sources will be controlled. 7H

3. Page 5.8-22, Impacts on Drainage and Runoff. The DEIR states "*The results indicate that for the larger regional watershed, the estimated 100-year peak discharge for the 'existing' or current watershed conditions is 466 cfs while development of the Specific Plan area would increase to only 470 cfs, a net change of 4 cfs.*" Please explain how the "existing" and "development" 100-year peak discahrge were calculated and what watershed conditions were used. Board staff also requests the project proponent provide a detailed map to show the nineteen individual watershed subareas for the hydrology study. 71

4. Page 5.8-30, Mitigation Measure for Water Quality 5.8-2d. The infiltration structures shall be located only where suitable soils exist. Board staff typically requires a minimum soil separation of at least five feet, between the bottom of an infiltration structure and the seasonal high ground water table. 71

Thank you for your attention to these comments. We look forward to working with you during the development of this project. The project proponent may schedule a meeting with Board staff to discuss specific concerns of the project. If you have any questions or comments regarding this letter, please contact me at (760) 241-7365 or Cindi Mitton at (760) 241-7413.

Sincerely,

Kai Dunn
Water Resource Control Engineer
Mono/Owens Watershed Unit

cc: Steve Mercer
Intrawest Mammoth Corporation
P.O. Box 2789
Mammoth Lakes, CA 93546-2789

John Moynier
Mammoth Community Water District
PO Box 597
Mammoth Lakes, CA 93546

KD\rc\N-Village-DEIR.doc

Response to Comment No. 7

Kai Dunn, California Regional Water Quality Control Board
September 15, 2000

7A. Mitigation Measure 5.8-2a, contained in the Draft EIR, responds to the commentor's request for an Erosion and Sediment Control Plan which is subject to Town and the Regional Water Quality Control Board approval.

7B. Mitigation Measure 5.8-2b contained in the Draft EIR responds to the commentor's request for a Storm Water Prevention Plan. The mitigation measure has been revised to state "Storm Water Pollution Prevention Plan".

7C. The discharge of dewatering water associated with construction is subject to the permit requirements of the Regional Board.

7D. The proposed project does not involve crossing and/or alteration of a stream channel. A Section 401 Permit would not be required.

7E. As referenced in the attached letter dated October 9, 2000, no jurisdictional wetlands occur on-site.

7F. Comment is noted by the Town of Mammoth Lakes.

7G. Comment is noted by the Town of Mammoth Lakes. The Town has elected to maintain the listing of agencies in Section 3.6 of the Final EIR as was presented in the Final EIR. The State Water Resources Control Board has been added to the listing of agencies. Also, wetlands are not associated with this project (refer to Response to Comment No. 7E).

7H. The "uncontrolled runoff" cited by the commentor is in reference to past development activities in the community, which was implemented under limited development control. These conditions created uncontrolled runoff and erosion problems which subsequently result in occasional flooding and water quality degradation.

Improvements associated with the proposed 1999 Specific Plan Amendment would not require substantial modifications to planned drainage improvement facilities for the area, as identified in the General Plan or Storm Drain Master Plan (SDMP). Drainage improvements associated with the Specific Plan, together with improvements identified in the *Mammoth Lakes SDMP,* provide adequate drainage facilities to accommodate anticipated flow increases. Implementation of the SDMP would improve storm drain deficiencies throughout the Specific Plan area to mitigate drainage and runoff impacts to a less than significant level.

7I. The existing and proposed 100-year peak discharge values were determined by Triad/Holmes Associates using the unit hydrograph method.

Triad/Holmes Associates developed an initial unit hydrograph for the North Village drainage basin, then developed runoff hydrographs for both the existing and proposed conditions. In the proposed condition, they modified the infiltration coefficient for the drainage basin based the additional impervious area created by the development of the Village at Mammoth.

The North Village Specific Plan Area occupies approximately 3% of the total area of the North Village Drainage Basin. Furthermore, because the existing Specific Plan area site is already developed, the incremental increase in impervious area is only 26.6% (46.6% to 73.1% impervious surface). Thus, looking at the Specific Plan's impact on the impervious surface over the entire drainage basin, there is an increase of 26.6% over 3% of the total area, or an increase of 0.8% of the impervious area for the drainage basin. Utilizing the peak runoff value of 466 cfs, and multiplying it by 0.8%, there is a runoff increase of 3.77 cfs.

Triad/Holmes Associates verified this increased flow by breaking down the Specific Plan area into 19 Subareas and utilizing the Town of Mammoth Lakes Hydrology Manual Method, calculated the runoff values for each subarea in the existing and proposed conditions. The runoff increase, based on the proposed Specific Plan development, is approximately 4 cfs (26.4 cfs existing, 30.7 cfs proposed). Attachments are included in response to this comment.

7J. Comment is noted by the Town of Mammoth Lakes.

ENGINEERING • PLANNING • RESOURCE MANAGEMENT
RESOURCE CONCEPTS, INC.
340 N. MINNESOTA ST. • CARSON CITY, NEVADA 89703-4152 • OFFICE: 775-883-1600 • FAX: 775-883-1656

October 9, 2000

Mr. Ed Brisson
INTRAWEST Mammoth Corporation
Post Office Box 2789
Mammoth Lakes, California 93546-2789

RE: Reconnaissance of the North Village Specific Plan Area for Jurisdictional Wetlands

Dear Mr. Brisson:

As per your request, Resource Concepts, Inc. (RCI) conducted a site reconnaissance of the North Village Specific Plan Area to determine the potential for occurrence of wetlands under the regulatory authority of Section 404 of the Clean Water Act.

Based upon our observations of the approximate 64 acre site there are no areas within this project area that meet the criteria for jurisdictional wetlands as defined in the 1987 *Corps of Engineers Wetlands Delineation Manual.*

If you have any questions regarding our reconnaissance, please do not hesitate to call me.

Respectfully,

Sheila Anderson

Sheila Anderson
Wetland Specialist

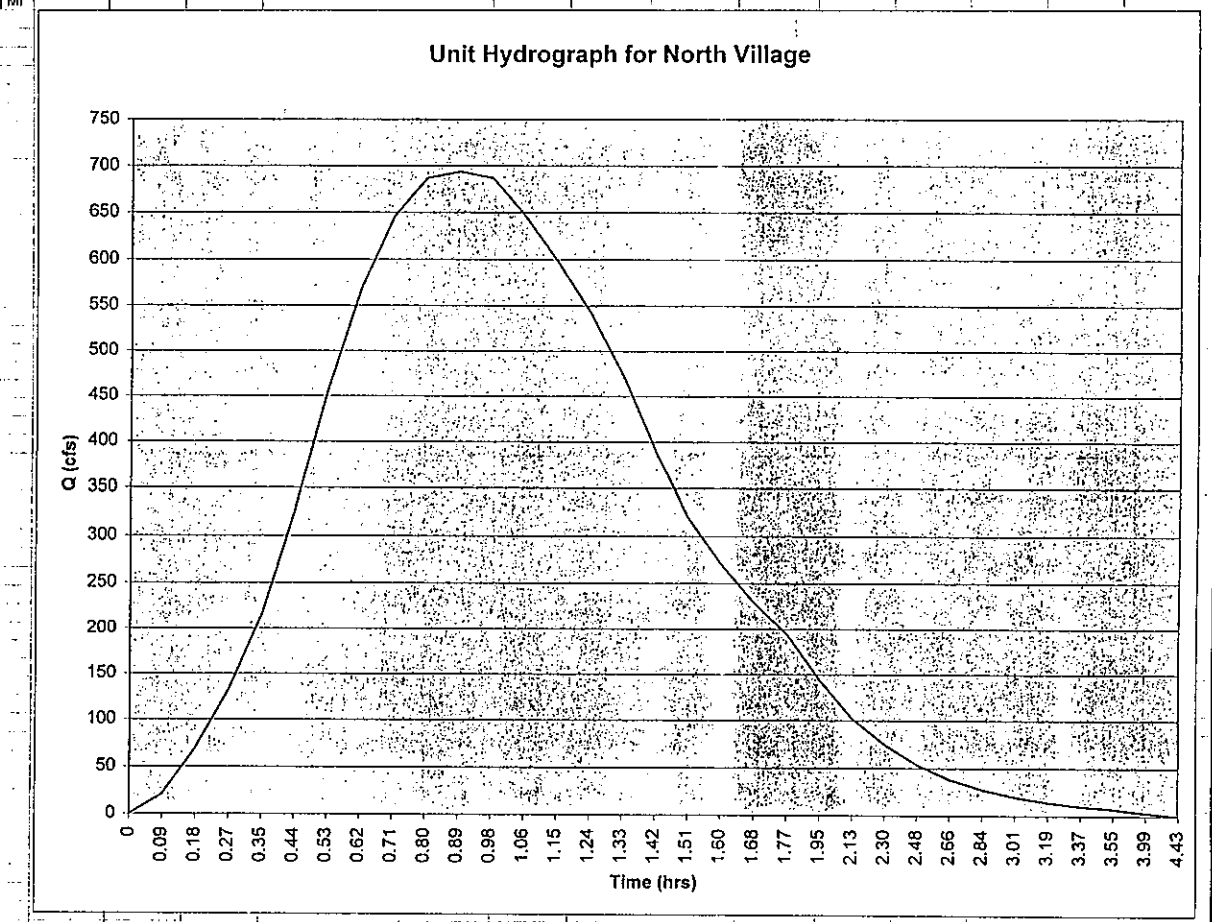
100 Yr Storm Unit Hydrograph

Area	1035	Acres	1.62	Sq Mi
Tc	1.33	hrs		
Rainfall Excess Time Interval, D	0.1769	hrs		
Time to Peak, Tp	0.8864	hrs		
Peak Flow, Qp	693.84	cfs		
Unit Hydrograph Volume	1530.97	CF-hours		

Unit Hydrograph /Runoff Hydrograph
Winter Existing

Where, tp= 0.8864 in hours & Qp = 693.84

Di (hours)	Qi (cfs)
0	0
0.09	20.82
0.18	69.38
0.27	131.83
0.35	215.09
0.44	326.10
0.53	457.93
0.62	568.95
0.71	645.27
0.80	686.90
0.89	693.84
0.98	686.90
1.06	645.27
1.15	596.70
1.24	541.19
1.33	471.81
1.42	388.55
1.51	319.17
1.60	270.60
1.68	228.97
1.77	194.27
1.95	143.62
2.13	101.99
2.30	74.24
2.48	53.43
2.66	38.16
2.84	27.75
3.01	20.12
3.19	14.57
3.37	10.41
3.55	7.63
3.99	3.47
4.43	0
sum=	8654.92



Existing Condition
Runoff Volume for North Village

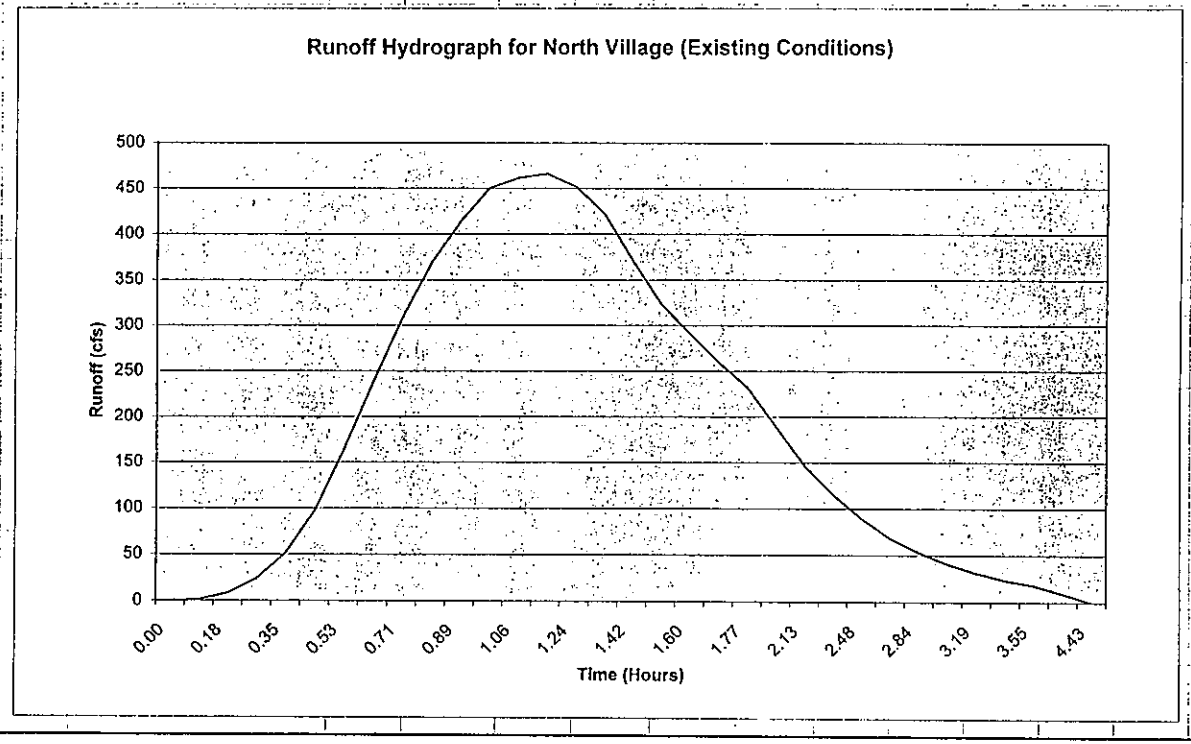
Precipitation Volumes, 100 yr storm
Winter

Precipitation Duration (Hrs)	Precipitation Volume (Inches)	Volumes/Time Interval	Incremental Excess Precipitation Volumes
1	1.4	1.4000	1.2687
3	2.9	0.7500	0.6187
6	4.2	0.4333	0.3021
12	5.8	0.2667	0.1354
24	9	0.2667	0.1354

Unit Hydrograph /Runoff Hydrograph
Winter Existing
Where, tp= 0.8864 in hours & Qp = 693.84

Di (hours)	Qi (cfs)	Ri (Inches)	Rhi
0.00	0.00	0	0
0.09	20.82	0.06	1.24
0.18	69.38	0.12	8.27
0.27	131.83	0.18	23.57
0.35	215.09	0.24	51.28
0.44	326.10	0.30	97.19
0.53	457.93	0.36	163.78
0.62	568.95	0.42	237.40
0.71	645.27	0.48	307.70
0.80	686.90	0.54	368.50
0.89	693.84	0.60	413.58
0.98	666.90	0.66	450.39
1.06	645.27	0.72	461.56
1.15	596.70	0.78	465.96
1.24	541.19	0.83	451.63
1.33	471.81	0.89	421.85
1.42	388.55	0.95	370.57
1.51	319.17	1.01	323.42
1.60	270.60	1.07	290.33
1.68	228.97	1.13	259.32
1.77	194.27	1.19	231.61
1.95	143.62	1.31	188.34
2.13	101.99	1.43	145.91
2.30	74.24	1.55	115.06
2.48	53.43	1.67	89.17
2.66	38.16	1.79	68.24
2.84	27.75	1.91	52.94
3.01	20.12	2.03	40.78
3.19	14.57	2.15	31.27
3.37	10.41	2.27	23.57
3.55	7.63	2.38	18.20
3.99	3.47	2.68	9.31
4.43	0.00	2.98	0
sum=	8654.92		6181.94

Winter				
Loss Volume, V	0.1313			
1-hr Precip. Volume, P	1.4	inches		
Time Interval, D	0.1769	hrs		
Infiltration Coefficient, C	0.47			
Area	1035	Acres	1.62	Sq Mi
Tc	1.33	hrs		
Rainfall Excess Time Interval, D	0.1769	hrs		
Time to Peak, Tp	0.8864	hrs		
Peak Flow, Qp	693.84	cfs		
Unit Hydrograph Volume	1530.97	CF-hours		
Runoff Hydrograph Volume	1093.52	CF-hours		



14-37

Attachment 2

Proposed Condition
Runoff Volume for North Village

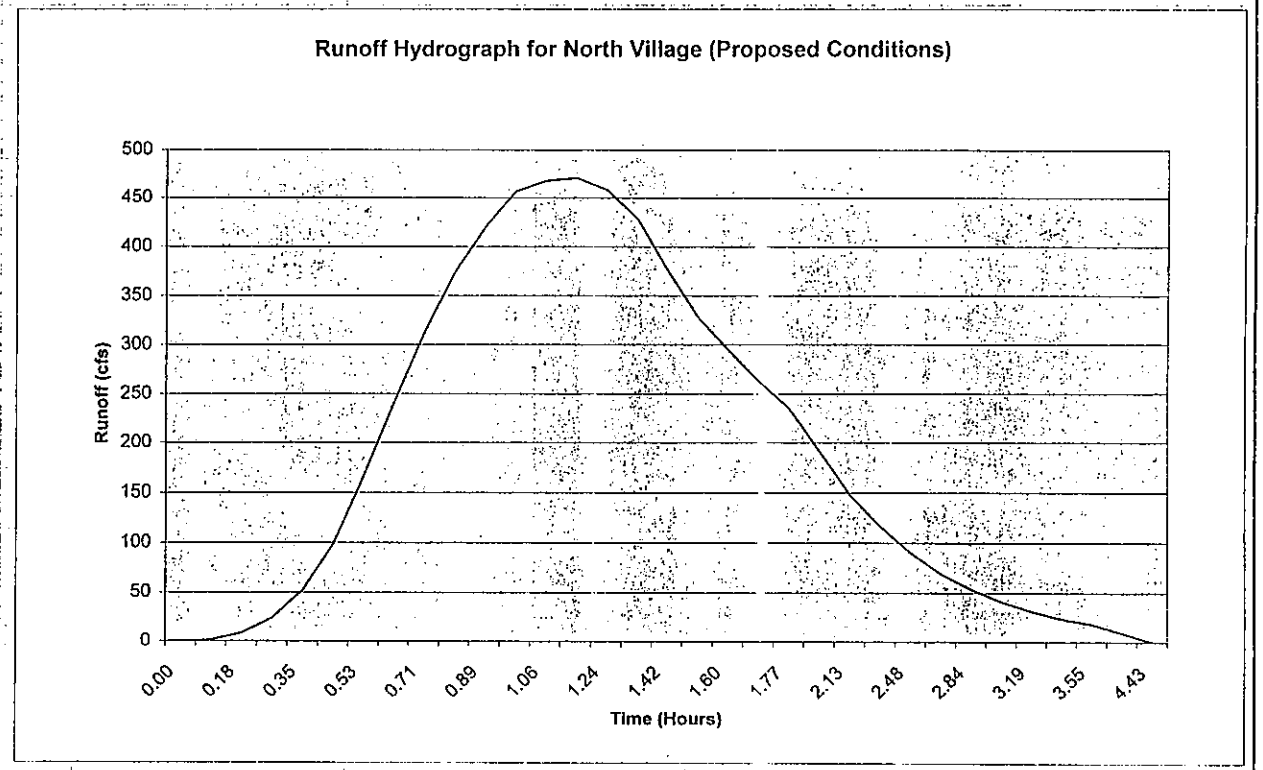
Precipitation Volumes, 100 yr storm
Winter

Precipitation Duration (Hrs)	Precipitation Volume (Inches)	Volumes/Time Interval	Incremental Excess Precipitation Volumes
1	1.4	1.4000	1.2668
3	2.9	0.7500	0.6168
6	4.2	0.4333	0.3001
12	5.8	0.2667	0.1334
24	9	0.2667	0.1334

Winter				
Loss Volume, V	0.1332			
1-hr Precip. Volume, P	1.4	Inches		
Time Interval, D	0.1769	hrs		
Infiltration Coefficient, C	0.462			
Area	1035	Acres	1.62	Sq Mi
Tc	1.33	hrs		
Rainfall Excess Time Interval, D	0.1769	hrs		
Time to Peak, Tp	0.8864	hrs		
Peak Flow, Qp	693.84	cfs		
Unit Hydrograph Volume	1530.97	CF-hours		
Runoff Hydrograph Volume	1108.02	CF-hours		

Unit Hydrograph /Runoff Hydrograph
Winter Existing
Where, tp= 0.8864 in hours & Qp = 693.84

Di (hours)	Qi (cfs)	Ri (Inches)	Rhi
0.00	0.00	0	0
0.09	20.82	0.06	1.26
0.18	69.38	0.12	8.38
0.27	131.83	0.18	23.89
0.35	215.09	0.24	51.98
0.44	326.10	0.30	98.50
0.53	457.93	0.36	165.99
0.62	568.95	0.42	240.60
0.71	645.27	0.48	311.86
0.80	686.90	0.54	373.48
0.89	693.84	0.60	419.17
0.98	686.90	0.66	456.47
1.06	645.27	0.72	467.79
1.15	596.70	0.79	470.72
1.24	541.19	0.85	457.73
1.33	471.81	0.91	427.55
1.42	388.55	0.97	375.57
1.51	319.17	1.03	327.79
1.60	270.60	1.09	294.26
1.68	228.97	1.15	262.82
1.77	194.27	1.21	234.73
1.95	143.62	1.33	190.89
2.13	101.99	1.45	147.88
2.30	74.24	1.57	116.61
2.48	53.43	1.69	90.37
2.66	38.16	1.81	69.16
2.84	27.75	1.93	53.65
3.01	20.12	2.05	41.33
3.19	14.57	2.17	31.69
3.37	10.41	2.30	23.89
3.55	7.63	2.42	18.44
3.99	3.47	2.72	9.43
4.43	0.00	3.02	0
sum=	8654.92		6263.91



Attach 3

Infiltration Coefficient Calculation
North Village

Total Unit Hydrograph Area	1035	Ac
Non-North Village Area	1003.46	Ac
% Impervious (assumed)	53.2%	
Equivalent Impervious Area	533.84	Ac
North Village Area	31.54	Ac
Rational Method		
% Impervious (Existing)	46.6%	
% Impervious (Proposed)	73.1%	
North Village		
Equivalent Impervious Area (Existing)	14.7	Ac
Equivalent Impervious Area (Proposed)	23.1	Ac
Combined Equivalent Impervious Area		
Equivalent Impervious Area (Existing)	548.52	Ac
Equivalent Impervious Area (Proposed)	556.90	Ac
% Impervious (Existing)	53.0%	
% Impervious (Proposed)	53.8%	
Infiltration Coefficient, C (Existing)	47.0%	
Infiltration Coefficient, C (Proposed)	46.2%	

Attachment 4

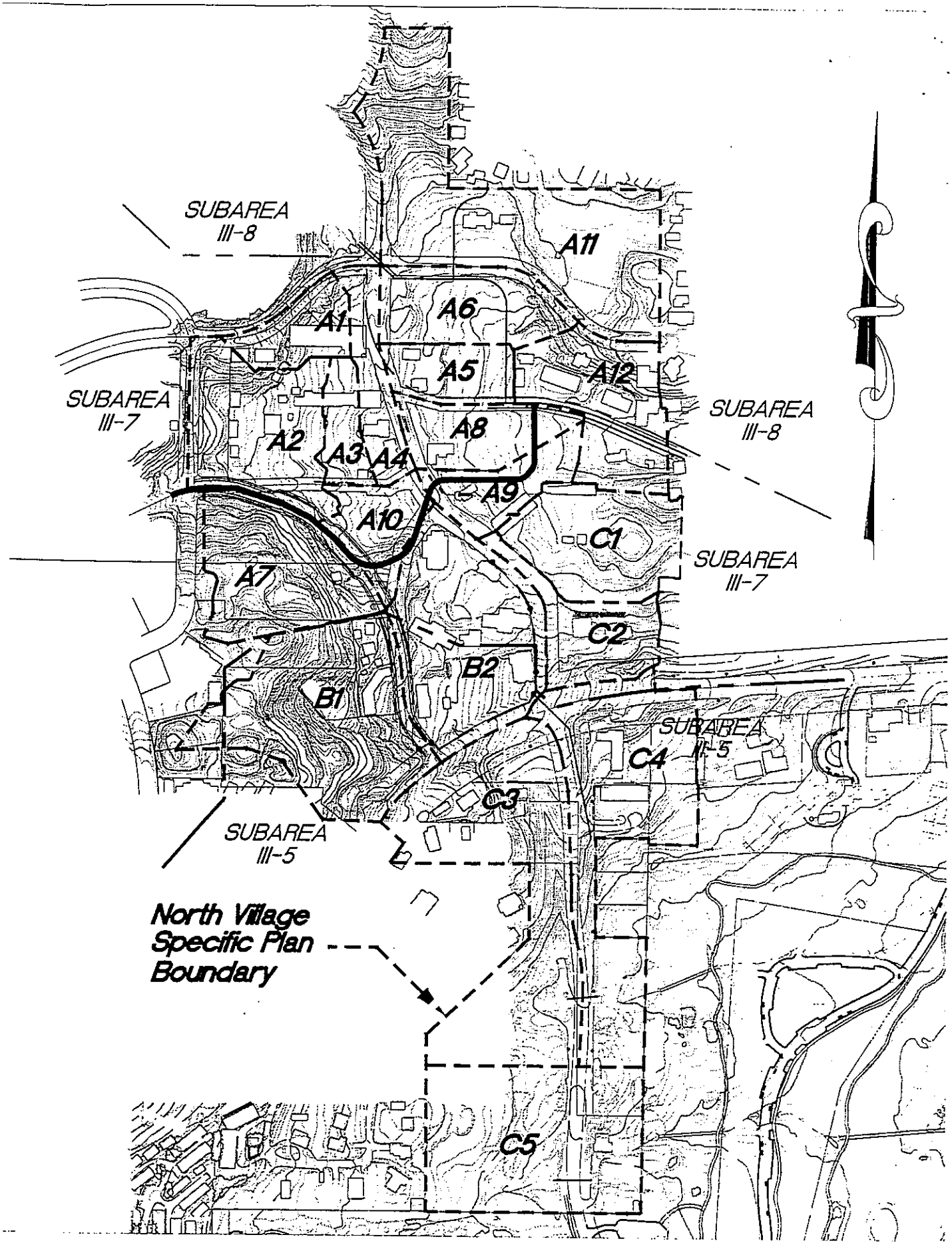
Triad/Holmes Associates
Calc'd By: D. Erdman

11/5/99

Watershed
Subarea Flow Table
North Village

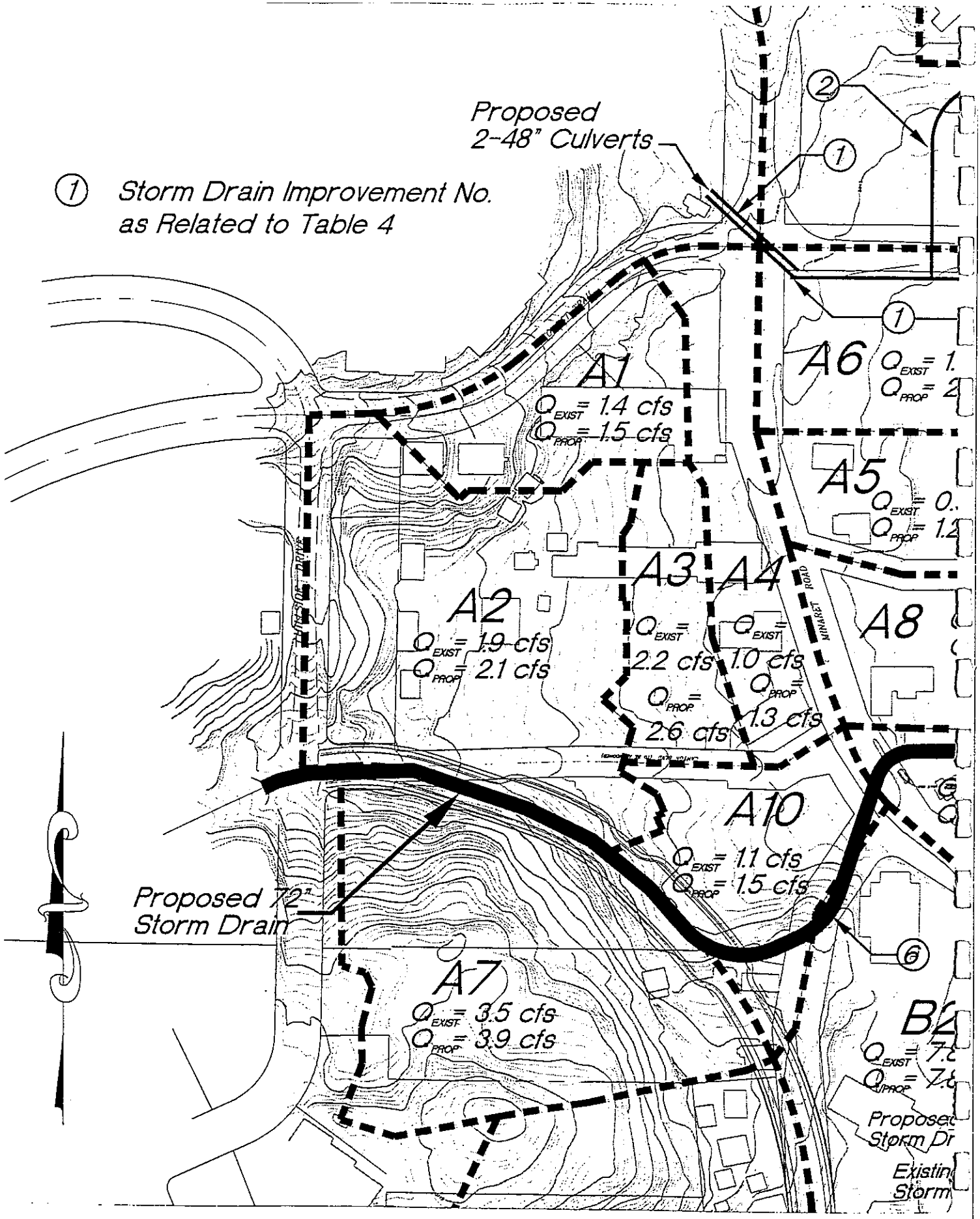
Drainage Area	Acreage	Q 100 Existing	Q 100 Proposed
A-1	1.6 ac	1.4 cfs	1.5 cfs
A-2	2.2 ac	1.9 cfs	2.1 cfs
A-3	2.5 ac	2.2 cfs	2.6 cfs
A-4	1.2 ac	1.0 cfs	1.3 cfs
A-5	1.2 ac	0.9 cfs	1.2 cfs
A-6	2.2 ac	1.6 cfs	2.1 cfs
A-7	4.3 ca	3.5 cfs	3.9 cfs
A-8	1.0 ac	1.0 cfs	1.0 cfs
A-9	1.2ac	1.3 cfs	1.3 cfs
A-10	1.5 ac	1.1 cfs	1.5 cfs
A-11	8.9 ac	7.2 cfs	8.6 cfs
A-12	3.7 ac	3.2 cfs	3.6 cfs
B-1	6.6 ac	6.0 cfs	8.0 cfs
B-2	5.8 ac	7.8 cfs	7.8 cfs
C-1	3.4 ac	4.2 cfs	4.8 cfs
C-2	1.6 ac	1.5 cfs	1.8 cfs
C-3	8.4 ac	3.8 cfs	5.0 cfs
C-4	7.2 ac	6.9 cfs	8.3 cfs
C-5	7.0 ac	5.8 cfs	8.1 cfs

Attachment 5



NORTH VILLAGE DRAINAGE SUBAREAS

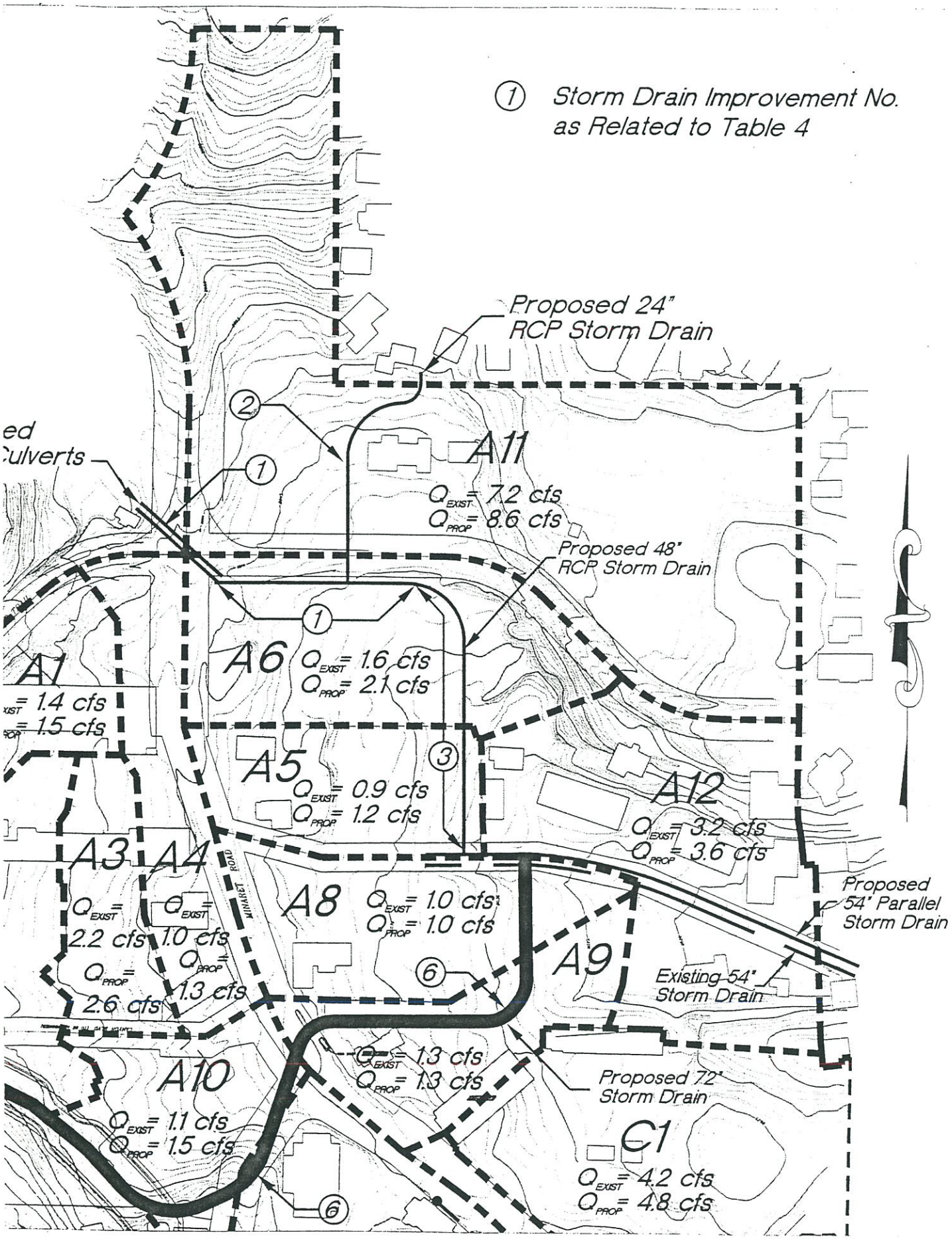
NOT TO SCALE



NORTH VILLAGE SUBAREA FLOWS

NOT CALE

triad/holmes associates

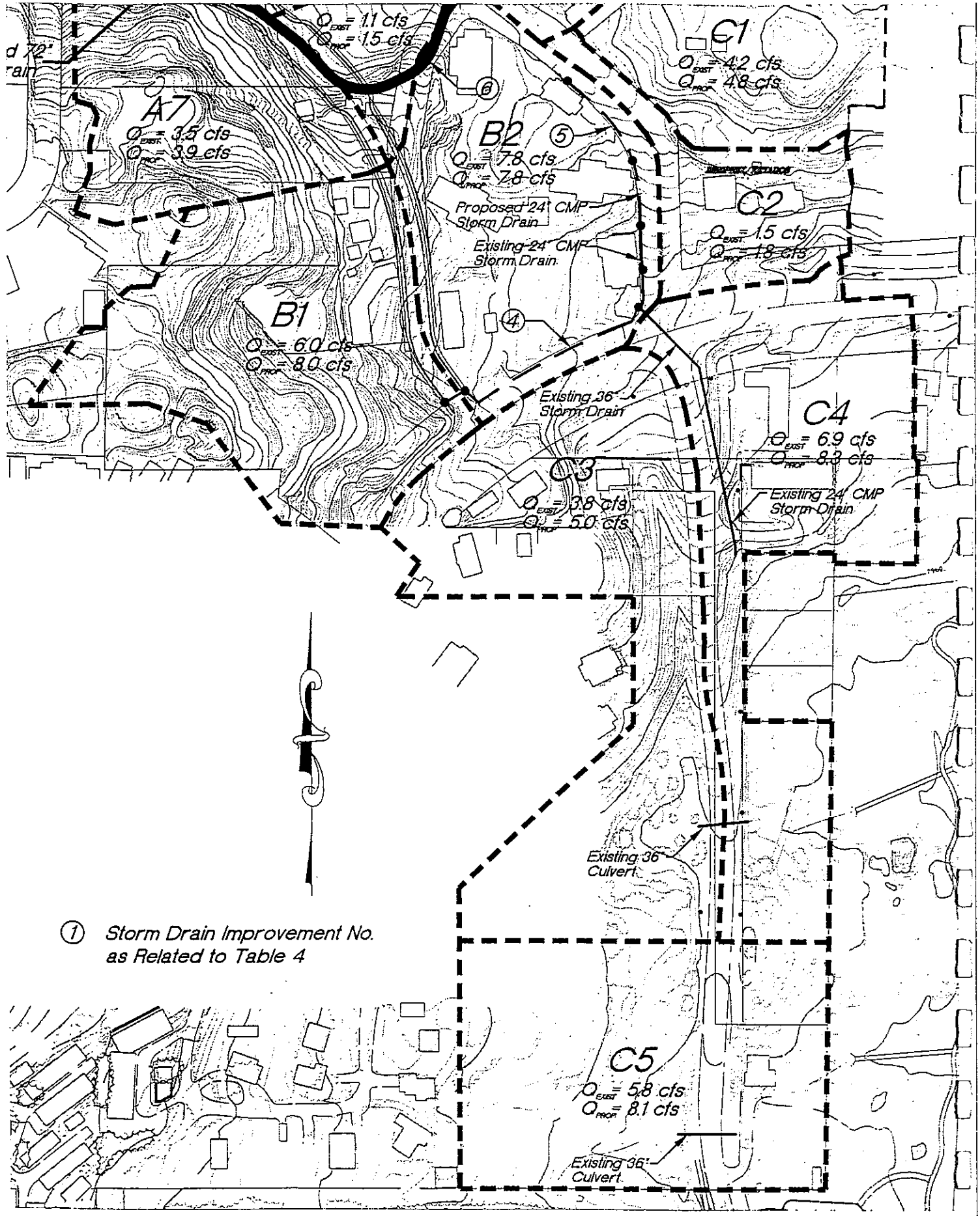


NORTH VILLAGE SUBAREA FLOWS

NOT SCALE

14-43

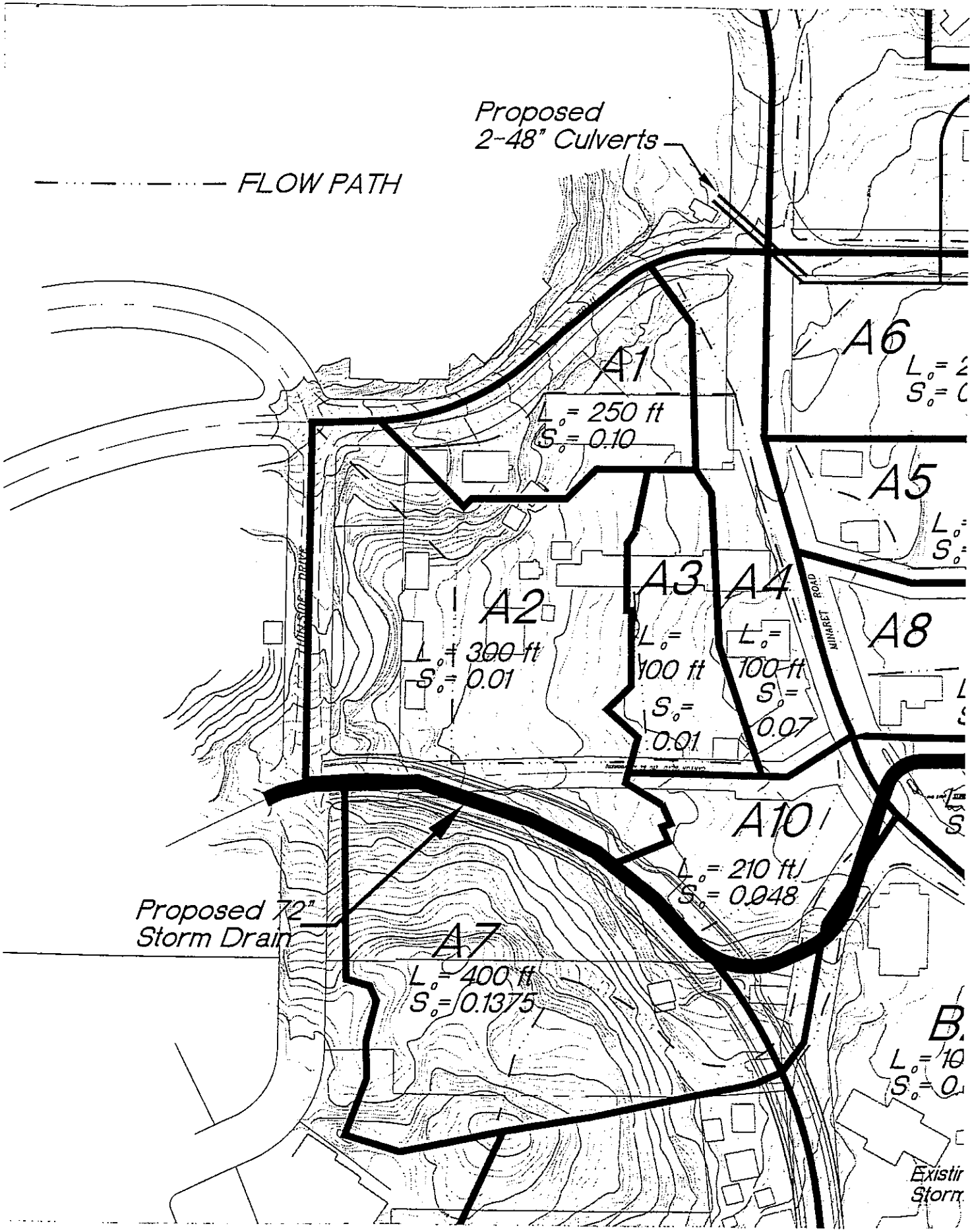
triad/holmes associates



NORTH VILLAGE SUBAREA FLOWS

NOT SCALE

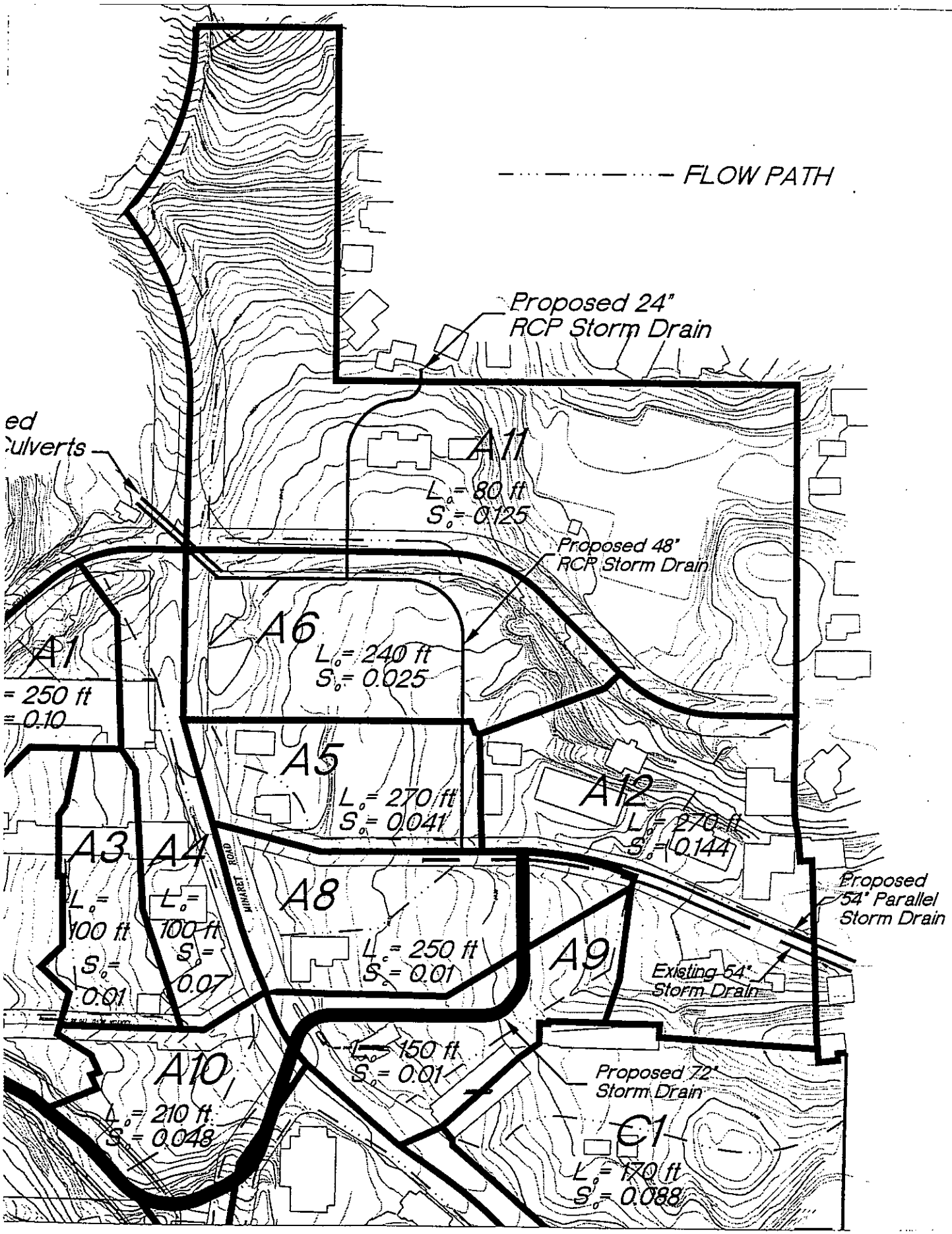
triad/holmes associates



NORTH VILLAGE SUBAREA FLOW PATHS

NOT TO SCALE

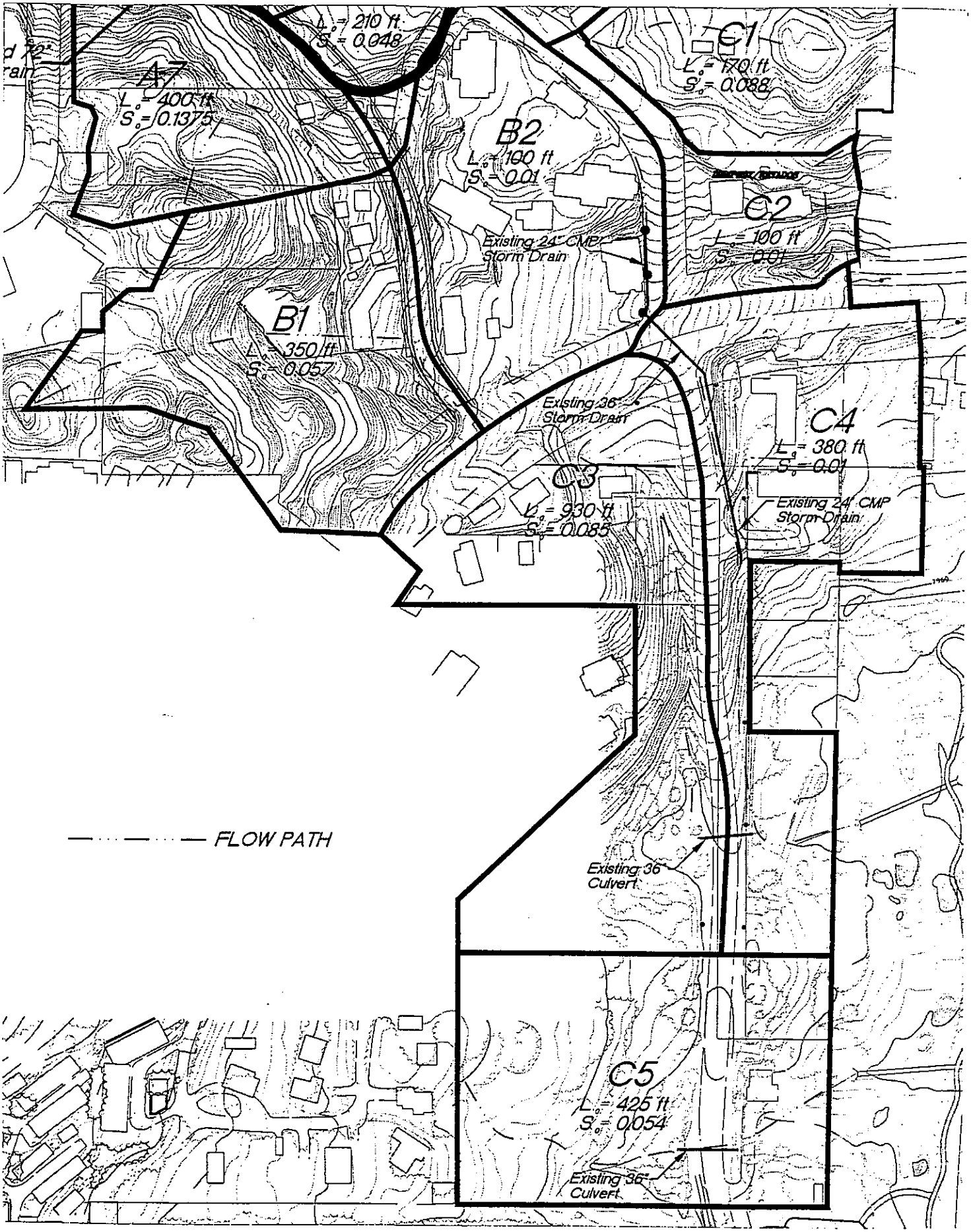
triad/holmes associates



NORTH VILLAGE SUBAREA FLOW PATHS

NOT 14-46 CALE

triad/holmes associates



NORTH VILLAGE SUBAREA FLOW PATHS

NOT 14-47 CALE

triad/holmes associates

September 18, 2000

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

From: Bob Beglau
P.O. Box 8224
Mammoth Lakes, CA 93546

To: Planning Commission

The existing town park and newly refurbished community tennis courts should be left alone. Mammoth needs these amenities, at ground level, in the trees, out of most winds. (Nobody that plays tennis wants to play three or four stories up, in the wind, fetching errant hits.) What is the proposed height limit for this location? Will there be a fence, increasing the height even higher? What will the setbacks be, 0' as in some commercial areas? 8A

To replace the courts will take alternate land and will cost more money. Or will the tennis courts ever be replaced? Will money really be spent to move these amenities to another location? And who will pay for this? I'm concerned ultimately these amenities won't be replaced. Has there ever been any mention of this? Instead, why not direct relocation costs for the land needed for parking in a better location?

We need this park more and more as the population, the "Village in Mammoth", and tourism grows. Actually we need more room for expansion of these amenities. The town should allow for the expansion of these amenities because the proposed Village will increase demand and usage. 8B

Currently this park provides a buffer to the commercial area being developed. To remove this buffer from the existing residentially zoned area will allow structures to be built that will block out sun, and views, shadowing some current homes. A parking structure will create a nuisance of noise, vehicle volume, and air and light pollution. It will change the quality of life, and remove the privacy that many Knolls residents/taxpayers have moved here for and are accustomed to, for over 30 years. (Several homes are only 50'-75' from this property line.) 8C

There are options to the proposed parking garage location that make more sense but to Do it right will cost a little more and take more time and effort. Why not put the parking closer to North Village and proposed ski back run? 8D

The most logical placement is in the forest, at the bottom and next to the proposed ski back run (like at chairs #2 & #15). Why hasn't the land behind Bear Essentials in the forest been included in this EIR? This would be the ideal location for parking if and when it is needed. Access and proximity to North Village and the ski back trail are closer at this location and safer for pedestrians, who will have to walk another block in ski boots, sometimes on slippery roads, and cross the new roundabout to be built on Minaret Road. 8E

Has anyone considered the potential volume of skiers that will end their ski day at this location? Or the fact that all these people will either move through the narrow court yard bordered by very tall buildings to access the new bus hub, or must cross Minaret Road. 8F

I've been told a parking lot could be put on forest service land, as the ski run will be, with a permit. But, to build a permanent structure will require a land trade, or outright purchase from 8G

the forest service. The exchange process or purchase may take 3 to 5 years? This timetable is consistent with the timetable proposed by Intrawest's 2nd phase. (By the way, the temporary parking needed in the 1st phase will be built upon in the 2nd phase. The 2nd phase should include the parking structure proposed in the 3rd phase.) 8G

By the way, who will actually benefit by using this parking facility on this parcel of town land? Will it be available to residents and skiers who don't stay within the "Village", or will it be used for overflow guests, and employees of the Intrawest project? And, where will the new volume of buses be parked, idling all night in cold winter months, creating noise and pollution? (Hopefully out of town at the old school site now being used.) 8H

Most people are unaware of how this approval process really works. Having witnessed the last Planning Commission's public meeting, and the presentation by Intrawest, listening to several comments, I've learned a lot. The rules are now clearer to me. Bait and switch is a ploy used by the players in big business. Intrawest has proven this by example in the past. At this meeting a representative of Intrawest clarified their past statements to the Planning Commission, stating "they never said they will put tennis courts on top of this proposed structure, but intend to put the parking under the existing courts". (September 11th Planning meeting)

What does this really mean, or imply? No one will make a commitment "only underground parking, or courts to remain at ground level". If a structure at this location is inevitable it Must Be Underground! , and we must have language that assures it. They have now said "We don't intend to do anything to this parcel, that's the towns property". (Intrawest presentation on September 18th)

Many people don't believe everything Intrawest says, again by examples they have given us. Intrawest is advertising with drawings, models and mail outs, a proposed parking structure where the tennis courts are located implying underground. But, when a representative of Intrawest states, "A parking structure may never be built in this location", this is probably true. (A statement made at the Planning meeting September 11th)

Once the town approves and allows the possibility of this structure at this location, their foot is in the door. Many people would bet money the plans will change. And a structure won't be below ground level. Either a parking structure will indeed be built and extend to the maximum height allowed by law, or perhaps the switch, a new plan to maximize return will be another Hotel or housing of sorts, this could possibily "become necessary". A reason used in the past for changing the use of the land originally designated for a parking structure on the Berner Street parcel. 8I

As Karen Johnston explained, if approved, Intrawest will have the right to change their minds and build anything that suits them, anything they want that is allowed by law within the new zoning with new trade offs, not just a parking structure. She further explained a building with a maximum height of 40' could actually be 50' or higher under current trade offs for a "box" building. (Likewise, a building of 60' could actually be 70', or higher). 8J

As long as this threat is included in the EIR without addressing it, under the umbrella of possibility, the whole town is in jeopardy of losing these courts forever. And many residents of the Knolls are being damaged.

What will become of the parcel of land the town owns that is currently used and designated as a footpath for access to the park (Knolls #117)? If this is approved "as is", will this parcels intended use change and become a paved access, used for emergency, and then turned into permanent access as the back entrance to the Post Office has been turned into? Already, many people travel through the Knolls as a short cut to avoid traffic, this will be yet another reason to use the Knolls as a short cut, or street parking in summer, creating even more unnecessary traffic in this residential neighborhood.

8K

I realize that some people are so anxious to get this project started that they want this approved "as is" but that isn't right, its better to build this project correctly, and logically, to benefit both the developer and the public. The point is this. We need this community park and the buffer it provides. Please do not allow the removal of our park and tennis courts. There is a better, more practical, and safer option.

Sincerely,

Bob Beglau

Response to Comment No. 8

Bob Beglau, Resident
September 18, 2000

8A. The maximum height of structures would be 35 - 45 feet. Side yard setbacks for the PS zone are 10 feet for buildings less than 35 feet and 20 feet for buildings more than 35 feet. The design of a specific improvement has not occurred. Therefore, fences are unknown at this time.

8B. Comment is noted by the Town of Mammoth Lakes. As stated in the Draft EIR, project implementation may increase the use of existing recreational facilities and create a need for additional park land. Potential impacts would be mitigated to a less than significant level in accordance with the Towns DIF Program and land dedication requirements in the Specific Plan.

8C. Comment is noted by the Town of Mammoth Lakes. Refer also to Response to Comment No. 4B. The site is zoned for public and quasi-public uses and could be developed for recreation facilities, parking garages, nursery school, libraries, parks, government offices, convention facilities, events arenas, and housing.

8D. The use is permitted in all districts in North Village.

8E. This land is not in the Specific Plan area. It is USFS administered land. There is a process for land exchanges; however, the USFS has not been receptive to land exchanges unless there is a benefit for the USFS.

8F. The concept is to bring the skiers through the commercial environment with the hope that they will stop to eat or shop along the way.

8G. Comment is noted by the Town of Mammoth Lakes.

8H. The project has not been defined well enough to answer these questions. The Specific Plan merely allows a parking structure as one of the many uses permitted in that district. Bus parking must be proposed along with each development and will be evaluated at that time.

8I. Comment is noted by the Town of Mammoth Lakes.

8J. The PS district within the Specific Plan allows certain uses. Any of the uses could be proposed in the future. This is true of all zoning districts. If the zoning is changed, those property owners within 300 feet will be notified of the required public hearing.

8K. The idea suggested is not proposed.

Ellen Hardebeck
Control Officer

COMMENT NO. 9

GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street - Bishop, CA 93514
(760) 872-8211 * Fax (760) 872-6109

September 18, 2000

Ms. Karen Johnston
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, California 93546-1609

RE: Draft EIR for North Village 1999 Specific Plan Amendment

Dear Ms. Johnston:

Thank you for the opportunity to review the Draft Subsequent Program Environmental Impact Report (EIR) for the North Village 1999 Specific Plan Amendment. We reviewed the project as a responsible agency for the air quality impacts associated with the project. We are concerned with the potential significant impacts to air quality caused by the increased traffic associated with the planned build-out of the North Village project.

The EIR estimates peak traffic will increase to 109,400 vehicle miles traveled (VMT) per day after build-out of the project. This proposed traffic volume exceeds the 106,600 VMT per day limit set out as an objective in the federally-approved State Implementation Plan (SIP) for the Town of Mammoth Lakes (Air Quality Management Plan for the Town of Mammoth Lakes, November 30, 1990, see also Town Ordinance Section 8.30.110 and District Rule 431.K) and used as a factor in the SIP's demonstration of attainment of air quality standards. The District agrees that exceeding this VMT threshold is a significant impact since it could contribute to a violation of the federal PM-10 standard for which the Town of Mammoth Lakes is currently designated a federal nonattainment area. **9A**

There are mitigation measures that could make this air quality impact less than significant, including:

1) Modify the project to reduce the VMT associated with it by, for example, increasing shuttle ridership and/or decreasing peak population. The SIP requires the Town to "incorporate such measures which reduce total vehicle miles traveled."
2) Evaluate the effects of offsetting the PM-10 emissions associated with increased VMT with the PM-10 reduced by, for example, prohibiting new wood burning devices. **9B**
3) Develop a street sweeping program that can achieve higher emission reductions sufficient to offset the increase of the VMT.

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SEP 20 2000
TOWN OF MAMMOTH LAKES
PLANNING DEPT.

The proposed mitigation measures 5.5-2b and 5.5-2c, which help to reduce PM-10 from road dust through street sweeping and from wood stoves through not installing wood burning devices (except pellet stoves) in the proposed project, are not specific enough for us to determine whether they would adequately mitigate the significant impact caused by exceeding the VMT limit. Although these mitigation measures may be beneficial, more work should be done to demonstrate that they mitigate the impact to less than significant. The commitment to contribute a "fair share" to the "street sweeping program" needs to be better defined. For instance, what is the street sweeping program, does it achieve the goals of Mammoth Lake's Air Quality Management Plan, and how is a "fair share" determined? If the exclusion of wood burning devices is being proposed to offset the increase in road dust emissions over the Town limit, an analysis of this offset should be included and compared to the AQMP projections used for the PM-10 attainment demonstration. **9C**

If mitigation measures that reduce the increased PM-10 emissions to a less-than-significant level are not included in the project, the District would not be able to approve permits for the North Village Project. District Rule 216: New Source Review Requirements for Determining Impact on Air Quality Secondary Sources, Section A. 2. states "The Air Pollution Control Officer shall deny a permit for any new secondary source which he determines will cause a violation or contribute to the continued violation of any state or national ambient air quality standard." **9D**

Please call Duane Ono or me at (760) 872-8211 if you have any questions about the District's comments on the Draft EIR for the North Village project.

Sincerely,

Ellen Hardebeck

Ellen Hardebeck
Air Pollution Control Officer

cc: Kathy Cage
Byng Hunt
Joanne Ronci

Response to Comment No. 9

Ellen Hardebeck, Great Basin Unified Air Pollution Control District
September 13, 2000

9A. Comment is noted by the Town of Mammoth Lakes.

9B. The issue for the APCD is whether the project will result in a violation of the National Ambient Air Quality Standards (NAAQS), either by itself or in conjunction with other existing and foreseeable projects. The projections for the project show that the project by itself or in conjunction with existing projects, will not violate the NAAQS; however, when combined with all other reasonably foreseeable projects, the project contributes to vehicle-miles-traveled (VMT) in excess of the target in the Town's Air quality Management Plan (AQMP).

The AQMP sets a maximum VMT target of 106,600 per day. The cumulative impact analysis for the North Village Specific Plan projects a peak level of 109,400 VMT, 2.6% above the target. This can be addressed in several ways. Development density can be reduced, vehicle trips can be reduced through other means, or particulate emissions can be reduced in other ways to offset the increase in VMT's.

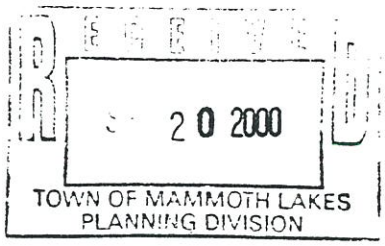
Two possible measures for reducing emissions are emissions offsets from removal of additional woodburning appliances and increased street sweeping. Based upon the AQMP, each VMT generates 23.8 grams of PM10 emissions from road dust. The 2800 VMT above the target would therefore generate an additional 66.64 kg/day. To offset this number would require the elimination of 308 woodstoves (0.216 kg/day) from the total project at buildout of the Town in the AQMP. Approximately 60 woodstoves are being eliminated from North Village and new development will not have woodburning appliances in the units. New development to date at Juniper Ridge and Lodestar that was presumed in the AQMP to include woodstoves has been constructed with gas appliances. The number of units constructed or under construction is 120 at Juniper Ridge and 127 at Lodestar. This brings the total number of woodstoves that were included in the AQMP emissions inventory which will be eliminated by the North Village plan or other currently approved projects to 307. This is sufficient to offset the increase in VMT's. Current plans for Lodestar development call for continued use of gas appliances, further reducing the woodsmoke emissions from levels projected in the AQMP. The ultimate reduction from development in Sierra Star and Deer Creek will be approximately 870 woodstoves.

9C. Refer to Response to Comment No. 9B.

9D. Comment is noted by the Town of Mammoth Lakes.

COMMENT NO. 10

at Mammoth • Condominium Homeowners Association
P.O. Box 7127 • Mammoth Lakes, CA 93546



Karen Johnstone
Town Planner
PO Box 1609
Mammoth Lakes
CA
93546

VIA FEDERAL EXPRESS

September 18, 2000

We are writing on behalf of the homeowners of Helios Condominium Association in response to the Draft Environmental Impact Report for the North Village 1999 Specific Plan Amendment. Apart from Fireside Condominiums, we believe that we are the closest existing condominium project to the North Village proposed development. The development of this major project will have a number of impacts on our homeowners, as well as the Town of Mammoth Lakes generally, and we are obviously concerned that the net effect is positive for our community. We have several concerns based on our understanding of the Specific Plan (Revised July 2000) and the current amended EIR. Although the majority of these involve the planned buildings adjacent to both the Helios buildings in the later phases of the proposed developments, we wish to register our concerns at this time. You will probably be aware that the Helios condominiums are based in 2 locations: North Helios (on Hillside Drive and Canyon Boulevard) and South Helios (that straddles Hillside Drive and Lakeview Boulevard). Both of these developments will be greatly affected by the proposed adjacent buildings. **10A**

First, the current Specific Plan shows a large parking structure at the corner of Hillside Drive and Canyon that was not included in the 1994 Specific Plan, and appears to be replacing a large condominium development (see exhibit 3-9 in the amended EIR report). We are very concerned about the impact that this proposed change will have on our project, the Northern half of which is immediately across Hillside Drive from the proposed parking structure, and the Southern part of which is approximately one-half block up Hillside on the same side of the street as the parking structure. Our concerns with this proposed change in the Specific Plan are as follows:

- **Visual Impact.** We are concerned with the visual impact that this structure will have on our homeowners in Helios North, who will look down on it from across Hillside Drive. Of course, this impact depends upon the height of the garage, the way that it is finished and whether there are any structures on top of it. Clearly, however, there is the potential for a major degradation of the visual impact to Helios relative to the previous Specific Plan. We believe it is vital that the majority of trees already growing on Hillside be **10B**

retained and that the Parking Structure be buried deep into the grade of the slope so that only one story, or less, is visible from Hillside Drive. 10B

- **Traffic.** We are concerned with the additional traffic that the existence of this garage will produce, especially as it impacts traffic flows on Hillside Drive and the Canyon Blvd. – Hillside Drive intersection. Currently Hillside Drive has virtually no through traffic (we believe considerably less than the 500 car per day statistic that is quoted in the EIR) but has appreciable pedestrian traffic across it for residents of Helios South who walk to the common shared facilities that are located in Helios North (Jacuzzi, racket-ball court, sauna etc.). Currently walking down this road involves very little risk even for relatively young children. The problem of increased traffic on Hillside Drive would be alleviated partly, but not wholly, if access to the parking structure and the large Hotel (listed as Hotel A in the plan) are limited to Canyon Blvd.. We greatly prefer a solution that minimizes easy traffic access to Hillside and Canyon Boulevard, above Hillside. We suggest that Hillside Boulevard be blocked from traffic from Canyon Boulevard and that all access to the Parking Structure and the Hotel come from Canyon Boulevard (from the East side of the Parking Structure). 10C

- **Inappropriate Parking Impact (& Traffic).** We are concerned about the potential for a negative impact of this garage on our own parking facilities due to "overflow" from the garage either when it is full due or by individuals discovering that they will have to pay to park and are unwilling to do so. We understand that it is the Town and Intrawest's position that the garage at Canyon and Hillside will not be used for skiing or other long-term (multi-hour) parking. We support this. However, when the inevitable car full of skiers does arrive at the gondola terminal expecting to park in the garage, and finds only limited and relatively expensive parking, they are going to look for other alternatives in the immediate vicinity. The entrance to our underground parking garage for Helios North is only 100 yards further up Canyon, and the outdoor parking for Helios South is the same distance up Hillside. We are concerned that we will have to bear the costs and inconvenience of 'policing' this inappropriate behavior and/or of installing fences or gates to limit access to our parking areas. This is unacceptable to us as it could represent both considerable inconvenience to our residents that legitimately need to park and a unwarranted financial obligation. Again, this concern would be minimized if Canyon Boulevard was 'blocked' at the level of Hillside Drive. 10D

Second, we are concerned with the potential impacts of changes in the setback requirements with respect to the structure identified as Lodge-Hotel A in the amended EIR.. This structure is immediately adjacent to Helios South, and is shown in both the 1994 and current Specific Plans ascending to seven stories in height. Quoting from p. 23 of the current North Village Specific Plan, "Because of their separation from the major pedestrian areas, these uses should not block sunlight or views" (this statement concerns the impact of the proposed Lodge-Hotel A structure on the North Village amenities below it). However, it is equally important to the homeowners in Helios South that this standard apply to the impact of this very tall proposed building on our condominium Project. 10E

Third, we are concerned about the degradation in pedestrian access for Helios homeowners to the North Village site and particularly to frequently used facilities such as Pioneer Market. Currently, there is easy access directly down Canyon Blvd, either from Hillside (for owners of Helios South) or directly (for owners of Helios North). Under current plans Hillside Drive will become much more heavily used. Further, the closure of the lower section of current Canyon Blvd. means that pedestrians will be forced to cross the busy Canyon/Millers Landing road to access the majority of the North Village site. These concerns would be alleviated by existence of a pedestrian pathway across Hillside and through the Village that could safely be used from both Helios North and Helios South, but we do not see that such access is included in the current Specific Plan. It is important to Helios and to other homeowners in our immediate neighborhood that the Village be constructed in such a way as to present an inviting and reasonably facilitated pedestrian access from the "back" (where we are located) as well as the "front" (i.e. Minaret Road). This is especially important since the new plan will make it impractical for us to access the Minaret Road businesses by automobile (a change that we favor). 10F

We hope that the Town will address our concerns as the plans for North Village are developed. We believe that our issues are both reasonable and raise issues reflecting changes from the original plans for the area. We also believe that these issues can be satisfactorily addressed. Since the plans for Phase 3 of North Village (Hotel A and the 'new' parking structure) are currently still embryonic we are confident that our concerns can be adequately addressed before the plans are finalized. We are willing to meet and discuss these concerns with both the Town and the developers to reach a solution to these problems. 10G

We ask that the Town keeps us informed and abreast of *any* relevant proposed developments in the plans that will affect us, not only when these are required by law. I would request that any correspondence or information be relayed to the Helios Board *via* our accountant's office, William Greene at the address below. We look forward to hearing a response to this letter and thank you for your consideration.

Sincerely,

David A. Shapiro, MD

President

Gary Leal, PhD

Treasurer

Cc: Helios Homeowners
Marge Tendler, Member at Large
William Greene, CPA – PO Box 1808, 325 Old Mammoth Road, Mammoth Lakes, CA 93546
Tel: 760-934-2958

Response to Comment No. 10

Helios at Mammoth, Condominium Homeowners Association
September 18, 2000

10A. Comments are noted by the Town of Mammoth Lakes.

10B. The EIR evaluated the parking garage as if it were any structure proposed within the Plaza Resort District. This would allow a 60 foot tall structure. The prior Specific Plan proposed a structure on this site also which could also have been up to 60 feet tall. As far as the trees are concerned, there is a setback from Hillside Drive of 10', 20'. 30' or 40', depending on the height of the structure.

10C. The traffic analysis contained in the Draft EIR evaluates impacts to Hillside Drive and Canyon Boulevard. Concerns for impacts along these roadways are noted by the Town of Mammoth Lakes.

10D. Unfortunately, people who misuse private facilities must be dealt with by the property owner as a trespass issue. The California Vehicle Code allows a property owner to post the site and if a car has to be towed, the violator has to pay the cost of towing (VC Section 22658.2). In any case, the parking standards appear to be reasonable given the shared parking arrangements referenced in the Draft EIR.

10E. Comment is noted by the Town of Mammoth Lakes. The objective cited would apply to this site.

10F. Comment is noted by the Town of Mammoth Lakes. The issue of pedestrian safety hazards is addressed in Section 5.4 of the Draft EIR.

10G. Comment is noted by the Town of Mammoth Lakes. The issue of pedestrian safety hazards is addressed in Section 5.4 of the Draft EIR.

RECEIVED
SEP 20 2000
TOWN OF MAMMOTH LAKES
PLANNING DIVISION

COMMENT NO. 11

September 19, 2000

To: Mammoth Lakes Town Council
Mammoth Lakes Planning Commission

From: Carolyn Caputo, Local Owner
Lot 139, 282 St. Anton Circle
Mammoth Knolls

As an owner in the Knolls, I am VERY CONCERNED about the future development of the north side of Lower Forest Trail east of Minaret. I DO NOT want to see us lose the greenspace of the Community Park, Tennis Courts, Library and Community Center.

Those of us who live a completely residential neighborhood like The Knolls do not want to have a garage, motel, hotel next to our homes. I do not want to lose the amenities currently located east of Minaret and northside of Forest Trail. Intrawest can build their garages and any other structures somewhere else. Berner Street would be definitely more appropriate. We do not need all the greenspace and community amenities destroyed, moved or replaced.

I use the tennis courts as a member of the Mammoth Lakes Tennis Club and regularly as a neighbor within walking distance and the Park as a Grandmom. I go to the Community Center and the Library. They are part of my neighborhood and the Town of Mammoth Lakes. Let these amenities remain! DELETE from any Intrawest development and future projects this area which was granted to the Town of Mammoth Lakes for the sole use of its inhabitants. **11A**

As the Realtor, the entire value of the homes on St. Anton Circle will depreciate. No one wants to stare at a garage, hotel, condo etc. The Knolls should remain strictly residential with NO nearby COMMERCIAL development by Intrawest in any of the phases for The Village at Mammoth. Make Intrawest scale down their plans for these vital areas of our Town. Do not allow the height of their structures to exceed 50 feet or 82 feet for a lodge on the south side of Lower Forest Trail. Garages should be built under ground. We DO NOT NEED a parking garage with tennis courts on top.

I am not oppose to the improvements planned for the westside of Minaret but I am adamantly opposed to eliminating the Community Center, Park, Library or the refurbished tennis courts which are used more and more every year. We need GREEN SPACE in which to enjoy our beautiful environment. As Submitted,

Carolyn P Caputo

Response to Comment No. 11

Carolyn Caputo, Resident
September 19, 2000

11A. Comment is noted by the Town of Mammoth Lakes.

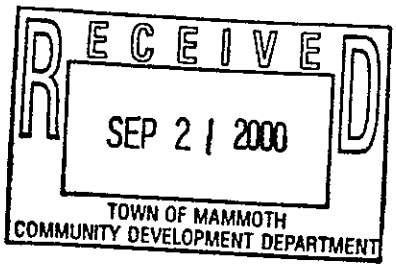
United States Department of Agriculture
Forest Service
Inyo National Forest
Mammoth Ranger Station
P.O. Box 148
Mammoth Lakes, CA 93546
(760) 924-5500
(760) 924-5531 TDD

COMMENT NO. 12

File Code: 1560

Date: 20 September, 2000

Town of Mammoth Lakes
Community Development: Karen Johnston
P.O. Box 1609
Mammoth Lakes, CA 93546



Dear ~~Karen~~ Karen:

I am writing this letter in response to your request for comments from the Inyo National Forest for the North Village Specific Plan Amendment.

Only a very small portion of national forest land which is included in the project. Therefore, our comments are minimal.

In the various maps and project descriptions concerning the location of the Roundabout, no mention is made that part of this project will be located on national forest land (that portion north of Forest Trail). While the Town has proposed to acquire that small parcel in the future, it would be best to note that a special use permit or easement would presently need to be acquired from the Forest Service to construct the Roundabout, and to note the minimal acreage which would be involved. By specifically discussing this minor part of the project in your document, we will be able to tier our NEPA document (for a special use permit) to this CEQA document and thus expedite our decision process. **12A**

In many of the maps shown in the document, the small portion of national forest land between the Community Center, Highway 203, and Mammoth Knolls Drive is shown as part of the project area, and generally not shown as national forest land. When it is noted as national forest land, the property boundaries shown are incomplete. (e.g. exhibits 3-2, 3-3, 3-10, others). **12B**

Also, on p. 5.10-5, it is correctly noted that Shady Rest Park is located on national forest land, under special use permit. The same should be noted for 15 acres of Mammoth Creek Park (5 acres on the west side, and 10 acres on the east side) on that same page. On the following page, it should be noted that a portion of the Town's bike trails are also located on national forest land, under special use permit. **12C**

General comments:

- We encourage property owners to consider the use of native plants when considering landscaping, to facilitate water conservation and to better blend with the natural environment found in the Eastern Sierra. **12D**

Caring for the Land and Serving People
Printed on Recycled Paper

- Construction-related activities, including use of equipment, and storage of supplies and materials, are to be confined to the property owner's lot, and not occur on the adjacent national forest land.

12E

I hope that these comments will help in your planning process. Please feel free to call me concerning the comments in this letter, at (760) 924-5505.

Sincerely,

SANDY G. HOGAN
Special Project Coordinator

cc: Dana Severy, Intrawest
Ron Keil, Acting District Ranger

Response to Comment No. 12

Sandy Hogan, United States Department of Agriculture
September 20, 2000

12A. Comment is noted by the Town of Mammoth Lakes. Section 3.6 identifies the U.S. Forest Service as an agency which will have permitting/approval authority for the project.

12B. Although concerns are noted by the Town of Mammoth Lakes with regard to graphics information, Exhibits 3-2, 3-3 and 3-10 accurately depict Land Use/Project Description information intended to be shown in each graphic.

12C. Page 5.10-5, paragraph 6, line 3 has been modified to include the following sentence: The 15 acre area is operated by the Town under a Special Use Permit from the National Forest Service.

Page 5.10-6, paragraph 4, line 3 has been modified to include the following sentence: A portion of the Town's bike trails are located on National Forest land under a Special Use Permit.

12D. Comment is noted by the Town of Mammoth Lakes.

12E. Comment is noted by the Town of Mammoth Lakes.

RAMSEYER AND ASSOCIATES, INC.
• CIVIL ENGINEERS • LAND PLANNERS • SURVEYORS •

COMMENT NO. 13

September 20, 2000

Ms. Karen Johnson
Town of Mammoth Lakes
Planning Department
P. O. Box 1609
Mammoth Lakes, Calif. 93546

Subject: North Village 1999 specific Plan Amendment – Traffic Report

Dear Karen:

I offer the following comments regarding the Amended Traffic Report dated August 4, 2000.

- Exhibit 5.4-3 shows blueline route incorrectly. The bus doesn't travel down Minaret from Canyon and west on Main Street. It stops at Minaret Rd. and Canyon and goes west on Canyon. It looks like the graphics are trying to show the proposed not the existing. There should be a plate added to show the proposed. **13A**

- A review of the peak traffic volumes for Forest Trail east and west and Minaret north of Forest Trail Exhibits 5.4-8 and 5.4-11 show that the peak travel increases on Forest Trail west of Minaret 3 times and 4 times greater than east of Minaret, and the peak hour traffic on Minaret north of Forest Trail increases by 36% which is unacceptable without mitigations. **13B**

- Exhibit 5.4-13 ADT build-out without North Village does not show Canyon tying into Minaret nor Hillside connection and therefore, it is my opinion that the resulting 5,300 ADT on Forest Trail west of Minaret is therefore, in error. **13C**

- Exhibit 5.4-14 shows a volume of 12,600 ADT on Main Street extension westerly of Minaret to Millers Siding, hopefully this will be changed to a 4-lane road in the Specific Plan. **13D**

- Introduction to Traffic Circulation addendum for the Town recommends the (LOS) for the Town be changed from a (LOS) of "C" to a (LOS) of "D". I agree with the report's recommendations for this change and the reasons stated in the report. **13E**

- Pages 5.4-21 & -22 speaks to elements to accommodate trip build-out. I recommend that all the bullets be included as conditions with the addition of the realignment of Forest Trail per my letter and exhibit of October 15, 1999. **13F**

- Page 5.4-27 the last paragraph, they state "no new traffic is forecast along Forest Trail, west of Hillside, or east of Berner Street, since there is little or no attraction to the North Village generated traffic" This is in direct conflict with my earlier comments regarding Exhibits 5.4-8 and 5.4-11. **13G**

The mitigation measures of pages 5.4-50 through 54 will save the Town and developer several million dollars in construction of improvements for widening roads and intersections. If the Town has been charging fees to developers towards these road and intersection problems, I would recommend the dollars collected put towards other traffic and parking problems.

All of us who ski know there are presently existing parking problems, whether it be at the Main Lodge, Chair 2 or Canyon Lodge. I sincerely hope that the Town can find way of increasing the transit system or parking lot areas for pick-up because, as indicated in the Traffic Report, the skier attraction will be 24,000 skiers at one time for Mammoth Mountain. This is a considerable increase from what is presently skiing the mountain and as stated in the Traffic Report the project will generate an additional 15,419 daily trips. 13H

Thank you for allowing me to participate in this great project for I fully support it for my grandchildren and great-grandchildren to come.

Sincerely,

Eddie P. Ramseyer
Registered Civil Engineer 26362
1690 Forest Trail
Mammoth Lakes, Calif. 93546
Mailing address: 10629 Encino Drive
Oak View, Calif. 93022
805-649-3428

Response to Comment No. 13

Eddie P. Ramseyer, Ramseyer and Associates, Inc.
September 20, 2000

13A. This comment is acknowledged. Exhibit 5.4-3 of the Final EIR shows the Blueline incorrectly.

13B. Improvements are recommended at the intersection of Minaret and Forest Trail to accommodate increased traffic volumes. A modern roundabout is proposed, which would provide adequate capacity for projected traffic volumes.

13C. The exhibit is correct; however, the title is misleading. The North Village project (as described in the 1997 Redevelopment Plan) prior to the 1999 Specific Plan amendment is assumed in this data and, therefore, the realignment of Canyon Boulevard into Miller's Siding is correct. There are no data presenting the Town's General Plan without a North Village development.

13D. This section of Lake Mary Road, westerly of Minaret, functions as a four lane road today. No additional physical widening is necessary to meet level of service standards. With two eastbound lanes approaching Minaret Road and two westbound lanes proceeding through the intersection of Minaret, adequate capacity exists.

13E. Comment is noted by the Town of Mammoth Lakes.

13F. The bullets listed on pages 5.4-21 and 22 are integral to the project description and cannot be removed without an environmental analysis as to impacts.

Forest Trail realignment is not included; however, a specific traffic management plan pertaining to Forest Trail west of Minaret is included in the project description.

13G. The statement on page 5.4-27 regarding "no new traffic is forecast along Forest Trail, west of Hillside and east of Berner Street . . ." is correct. There is, however, an increase on Forest Trail between Minaret and Hillside and between Minaret and Berner. These increases are shown on Exhibits 5.4-11, compared to Exhibits 5.4-8 and 5.4-5 of the Final EIR.

13H. Comment is noted by the Town of Mammoth Lakes.

13I. Comment is noted by the Town of Mammoth Lakes.

COMMENT NO. 14

SEP 2 0 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

The Mammoth Knolls Homeowners Association, represents the 106 families (paid members) of our residential area. We have a variety of opinions regarding the proposed big new "Village" neighbor. However, we are all hoping it will be a quality project and that it will turn out well.

We would like to submit some comments and questions on the North Village Plan and the "Village at Mammoth" as presented in the 1999 Specific Plan and the August 4, 2000 EIR Report. As we will be very close neighbors of this development, we feel that there will be many aspects of the project that will impact us.

Briefly, we feel the items that will impact us most are:

1. Increase in the number of people, new residents, tourists, and employees.
2. More traffic, busses, pedestrians, and cars.
3. More glare from village lights and roundabout lighting.
4. Building heights to 110 feet blocking our view.
5. Possibly four story free standing parking structures by the tennis courts.
6. Possibly a cul-de-sac on Forest Trail limiting circulation.
7. Difficult pedestrian crossings at the roundabout.
8. Degradation of air quality.

14A

More specific details concerning these items are as follows:

POPULATION INCREASE ESTIMATE (Tables 5.2-3, 5.2-4 & 5.2-8)

According to the EIR, visitors could increase by approximately 4,472 persons as a result of the proposed 3020 rooms and 135,000 sq. ft. of of commercial use. Employment could potentially result in 1532 full time equivalent employees or become as high as 3448 full time, seasonal or part time employees. The Town's weekend population is currently around 30,000 and is estimated to reach 52,000.

14B

The EIR's conclusion is that this growth would result in the long term effects of increased traffic, additional noise, degradation of local air quality, increased demand for public services, etc. Never-the-less, the EIR (6.7) concludes that the plan would not result in significant growth inducing impacts. We do not agree with this conclusion.

CIRCULATION STANDARDS.
Specific Plan p. 80

The reduction in width of Minaret Road from 80 feet to 70 feet, the elimination of the pedestrian over-crossing, the elimination of an automatic signal at Forest Trail and Minaret, and the possibility of a cul-de-sac on Forest Trail would increase congestion on Route 203 which impair our access from Mammoth Knolls Drive. When all of this is added to the 4000 or so new neighbors, we feel that we could almost be isolated from highway 203 as a useful route to and from the Knolls.

14C

TABLE 5.4-3: TYPICAL WINTER SATURDAY INTERSECTION

In this table, on a typical winter Saturday the intersection of Minaret Road and Forest Trail has a level of service designated A. The delay through the intersection is 1.1 seconds according to the table. Possibly, this was taken at 12:00 noon, not at 5:00 PM. Even with a roundabout when traffic should flow normally, on a peak time on a winter Saturday the traffic is always backed up and stop and go on Minaret (203). Add busses full of skiers coming down from Hillside on Forest Trail to the already congested Saturday peak traffic and you will have a complete tie up of the roundabout. Getting out of Mammoth Knolls Drive will be nearly impossible. **14D**

LIGHTING AND GLARE
EIR 5.3-17

The 1999 plan says it would not add additional light and glare to that proposed in the 1994 plan. We question this as the roundabout will have many more lights than the previously planned automatic signals. This lighting is to extend 200 feet from the yield lines which are 70 feet from the center of the roundabout. This is adding substantial additional lighting. **14E**

BUILDING HEIGHTS
EIR, pg. 5.3-13

The EIR states that, "Thresholds of significance for building heights are the same as for building setbacks. If the project has an adverse effect on a scenic vista or substantially degrades the visual character of the site or its surroundings, the project could have a significant effect on the environment."

Buildings in the northerly portion of the development, particularly on the east side of Minaret could degrade the visual character of its surroundings, particularly the view from homes located in the southerly portion of the Knolls. The maximum projected building heights (in feet) are much higher than we have had in this area in the past. We realize that the building heights will be varied to give views and variety to the area. The highest buildings, including garages, can be 112 feet. Will this be an eyesore for us or a beautiful sight. The new view of the structures will be competing with the existing view of mountains and trees. **14F**

AIR QUALITY AND NOISE

The new transit system with busses going in and out of the area will create much noise and pollution. The "Village" will have to provide more heating and air conditioning for all its occupants. All of this will create, according to the EIR (9.2), "a significant and **14G**

unavoidable air quality impact. On a cumulative level, the project would contribute to a current violation of State and Federal P. M. 10 Standards. This contribution will be significant and unavoidable." Many of us left Southern California to get away from the smog and congestion and this is not good news for us. 14G

CONCLUDING SUGGESTIONS

1. Leave large trees to reduce the effect of glare from village and roundabout lighting and to obscure the view of high buildings.

2. Do not put a cul-de-sac on Forest Trail by the tennis courts. Leave Forest Trail as a way in and out of the Knolls (via Grindewald).

3. If a parking facility is needed by the tennis courts, put it underground. 14H

4. In your evaluation of traffic safety and congestion, please consider pedestrian bridges and/or tunnels for safe access. We would also suggest that an additional south-bound lane be added between the roundabout and the four lane portion of Minaret (near Pioneer Market) to accommodate bus traffic of the new transit system.

5. Install effective light shielding on the illumination of the roundabout to reduce the glare to a minimum.

We appreciate your consideration of the forgoing comments. Any questions may be addressed to the undersigned.

Sincerely,

Frank C. Hoyt

Frank C. Hoyt, President
Ph. (760) 934-3542
(949) 855-2196

Response to Comment No. 14

Frank C. Hoyt, Mammoth Knolls Homeowners Association
Received September 20, 2000

14A. Comment is noted by the Town of Mammoth Lakes.

14B. As stated on Page 6-6 of the Draft EIR:

While the additional employment and resultant population growth and housing construction induced by the project may in and of itself be considered growth inducing, this growth was anticipated in both local and regional plans as is evidenced below:

- The proposed Plan would result in fewer FTEE and a reduction in the projected population increase of the 1994 Specific Plan.
- The difference in seasonal population between the 1994 Specific Plan and the 1999 Specific Plan Amendment is not considered significant in as much as the Town's General Plan anticipated the project's development and resultant seasonal population increases. Further, project implementation is consistent with the General Plan's policies with respect to the projected growth in seasonal population.
- The proposed 1999 Specific Plan Amendment would result in a slightly lesser demand for housing than the 1994 Specific Plan;
- The Town's General Plan designates the site as Specific Plan area, hence, anticipating development and resultant population increases. Further, the anticipated population growth is accommodated by the Town's existing zoning regulations.
- The proposed 1999 Specific Plan Amendment would not increase the overall permitted square footage of commercial uses beyond those previously approved for the site and as analyzed in the certified 1991 EIR and 1994 EIR Addendum.

14C. Comment is noted by the Town of Mammoth Lakes.

14D. This level of service and delay calculation at Forest Trail and Minaret was taken on February 25, 1995, between 4:15 p.m. and 5:15 p.m.

The concern is with the ability to get out of the Mammoth Knolls project on a winter Saturday afternoon. This problem exists now and is not exacerbated by the proposed North Village project. In fact, many of the attributes of the North Village project will ameliorate the problem.

The most significant improvement addressing this issue is the realignment of Canyon Boulevard into Miller's Siding, eliminating the Canyon Boulevard/Minaret Road intersection. Eastbound traffic from Canyon Boulevard turning right onto Minaret Road in the afternoon is one of the primary causes of Minaret Road traffic to back up north of Forest Trail. The realigned Canyon Boulevard traffic will be connected to a new signalized intersection with Lake Mary Road.

The second significant improvement will be the addition of a second exclusive southbound left turn lane for Minaret Road at the Lake Mary Road/Main Street intersection. This improvement addresses the critical movement during the winter afternoon peak hour and will provide substantial benefit toward lessening traffic back-up.

A third improvement for traffic flow is the elimination of driveways along Minaret between Canyon Boulevard and Forest Trail. These existing driveways increase friction along the roadway, slowing traffic down while vehicles negotiate turns into and out of the driveways.

A fourth improvement is the proposed roundabout at the intersection of Forest Trail and Minaret Road. The roundabout is designed to maintain a smooth continuous traffic flow without traffic back-up. The roundabout is proposed in lieu of a conventional traffic signal, which would back up traffic.

In summary, there are several significant traffic improvements committed as part of the North Village project that are specifically designed to improve traffic flow into and through the North Village area.

14E. The lighting required for the roundabout is subject to Caltrans approval. Street lights would have been required for a signalized intersection also. The Town will require shielded and downward directed lights, similar to the new street lights installed on Highway 203 (Main Street). The light pattern on these new street lights shines only on the street travel ways.

14F. Comment is noted by the Town of Mammoth Lakes. The building height is the same as under the 1994 Specific Plan. The viewshed analysis required by CEQA relates to the scenic vistas. The actual height of building on the east site of Minaret Road and as viewed from the roundabout would be approximately 65 feet.

14G. Comment is noted by the Town of Mammoth Lakes.

14H. Comment is noted by the Town of Mammoth Lakes.

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

COMMENT NO. 15

Mammoth Lakes Planning Commission
Re. Comments on North Village Specific Plan Amendment and EIR

September 20,2000

Dear Commissioners: We would like to request that you not allow the deletion of the section on page 26 # 5 under "Plaza Resort" which addresses the amount of retail commercial in North Village, for the following reasons:

1.) This section represents an agreement between the original proponents, and the majority of the properties owned in North Village. Its exclusion would be a breach of faith.

2.) The proposed commercial retail space is estimated to be many times greater than the demand generated by the 270 additional lodging units in Phase One. Therefore its sustainability requires that the supply of customers must be taken from the rest of the community. 15A

In 1991, many of the businesses in North Village were concerned that they would be supporting, with their endorsement and dollars a "Specific Plan", which would lead to the development of an excess retail capacity in relation to the amount of new beds supplied. The non-mountain properties were asked to make many concessions to further the plan, and asked only that commercial development match the increase in demand. **All** parties agreed to this. At this stage, to eliminate the necessity to match the supply to the increased demand would jeopardize the agreement.

The town commissioned studies to determine the feasibility of lodging demand and future supply. We ask that this same approach be taken with Restaurant seating and retail. We are aware that some businesses will fail with the increased competition, but this could be significant if the supply greatly exceeds the anticipated demand. A simple calculation could be developed to address this section of the Specific Plan.

We would be glad to meet with you to discuss this issue in more detail.

Yours truly.
Sam Walker and Gary Berger

Response to Comment No. 15

Sam Walker and Gary Berger, Residents
September 20, 2000

15A. Although this comment does not identify environmental comments relative to the Draft EIR, it is noted by the Town of Mammoth Lakes.

COMMENT NO. 16

Preserving the Eastern Sierra Tradition of Environmental Responsibility
Working to preserve the spectacular natural beauty of the Eastern Sierra Nevada and to keep HWY 395 in Mono County a scenic corridor now and in the future

P.E.S.T.E.R.
a 501(c)3 non-profit publicly supported organization
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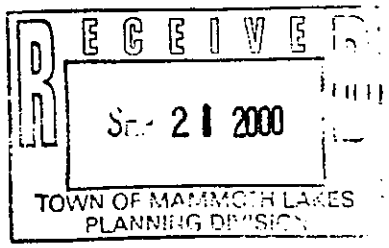
September 20, 2000



Karen Johnston, Senior Planner
Town of Mammoth Lakes
Post Office Box 1609
Mammoth Lakes, CA 93546

Dear Karen:
This letter, on behalf of the supporters of P.E.S.T.E.R., is in response to your request for comment on the Draft Environmental Impact Report for the North Village Specific Plan Amendment. Although some remarks will reference the amended North Village Specific Plan, P.E.S.T.E.R. will be commenting at a later date on the project plan as a whole.

P.E.S.T.E.R. NOT OPPOSED TO DEVELOPMENT
As spokesperson for Preserving the Eastern Sierra Tradition of Environmental Responsibility, I have stated publicly numerous times that P.E.S.T.E.R. is not opposed to development. P.E.S.T.E.R. is opposed though to inappropriately designed, scaled and/or situated development that detracts from the very qualities that bring our visitors here. We are acutely aware that a strong recreation-based economy coupled with a vigilant citizenry is the best insurance policy we could have for preserving the spectacular natural beauty that is the Eastern Sierra.

The development of North Village is a wonderful opportunity for keeping our tourism economy strong. However, we'll only get one shot at it, and it has to be done right if Mammoth is to economically compete for the long term. Intrawest's North Village Specific Plan Amendment proposal, while much improved from an earlier version, raises some concerns.

TRAFFIC/CIRCULATION/PARKING

This issue could be the project's Achilles' heel. We applaud the pedestrian orientation of the village, the Ski Back Trail, roundabout and landscaped median in the middle of Minaret, but how day skiers, visitors, and residents will get to the Village and the Mountain's gondola portal has not been adequately addressed. The sheer volume of movement is daunting. Where will all the cars go? On neighborhood streets? And what will happen to our air quality as visitors drive around seeking a parking place? (We also have serious concerns about air quality as we approach carrying capacity if the whole "car problem" in our small community isn't adequately dealt with.)

P.E.S.T.E.R.'s supporters are unanimous in their opposition to the Town spending $14M in tax dollars for a parking garage for Intrawest's project. Parking at North Village for day skiers and commercial users (shoppers) should be borne by the Mountain and Intrawest, in our opinion.

However, more creative and environmentally sustainable options have also been suggested for the car problem that could be in place by the time the Village is completed. "Shared parking" where empty parking spaces (both under the North Village development and in motel/restaurant parking lots around town) are available on a pay per use basis during the day is an excellent use of existing space and resources. We understand Intrawest anticipates a 60-65% occupancy rate (excluding the three busiest holiday periods). It is wasteful not to utilize fully those empty "lodging guest" parking places. Motels and restaurants could offset some of their snow removal costs with parking fees from shoppers and day skiers. There is computer software available to work out the kinks in such a system.

16A

We know you are in agreement that once the visitor is divested of his vehicle, there has to be a reliable, frequent shuttle system to take him where he needs to go. A year-round system may be unrealistic, but we urge the Town to put at the top of their priority list--and pursue grant money for--a public transit system that runs summer and winter.

As we approach carrying capacity, public parking garages will likely be necessary in our future pedestrian-oriented community. Facilities more centrally located than at North Village would be the most logical to reduce

traffic congestion and provide convenience. A better use of Mammoth's limited space would be a parking garage under the Von's parking lot. Also, a more convenient location for an additional parking facility than at North Village would be near Old Mammoth Road and Main Street.

16A

We all know that Mammoth needs more sidewalks and we hope the Trail system will be completed as soon as possible to provide healthy, non-polluting alternatives to the automobile.

THE GONDOLA

Even though it will have a significant visual impact, we support the new gondola because it will reduce traffic congestion and air pollution. We would expect that, in the tradition of other development at the Mountain, it will be attractive, well-done and blend in with the landscape.

16B

Most of us prefer that the gondola travel above the trees to preserve as much natural landscape as possible and residents' privacy along its route.

TREES

Tree preservation continues to be a source of concern. We have seen no tree inventory or replacement plan. We continue to object strenuously to the town's policy of basing tree replacement value on the value of firewood the tree produces. DBH, height, age and health are better criteria, we believe. A fifteen-gallon conifer cannot replace a 100-year-old Jeffrey. Better not to cut it down in the first place.

It is crucial that to preserve the "village in a forest" ambiance—in addition to preserving as much of the forest as possible—that a wide buffer zone of trees be preserved around the Village particularly on the west and north. We ask the town to require that trees be carefully protected with trunk shields and root zone fences during construction. All over town, we've noted trees are being injured and/or killed by careless contractors and inattentive heavy equipment operators.

16C

Trees along the gondola route should be preserved to the maximum extent possible. The smallest possible equipment with minimal environmental impact should be used to install the towers (helicopters?).

VIEWS AND SOUTHERN EXPOSURE

The primary views and solar exposure are to the south and east. It appears that Building W-3 may significantly block views and sunshine. #10 under Land Use Policies (p. 18) says "View corridors*** shall be protected*** " but we did not find any elevations in the Plan or DEIR indicating line of sight views and solar access from various points in the project. **16D**

NOISE

We question whether the short and long-term noise impacts have been adequately addressed.

We are collectively appalled at the request for piped-in music outdoors. This is a ski village, not a shopping mall. Music outdoors in Mammoth can be a wonderful experience but only at concerts. This is aural pollution. **16E**

LIGHT POLLUTION

We question whether there has been adequate analysis of spill-over and glare from on-site lighting. For example, the artist's conception of the plaza area with "McCoy's" in the foreground (right) shows strings of bright naked bulbs in violation of Town ordinance requiring shielded, down-directed outdoor light fixtures. **16F**

AESTHETICS

This aspect is key to the long-term success of the village..

We do not think, based on the elevations that have been presented, the present design is consistent with the Development Objective, "appearance of a small town that has grown over time", particularly a small alpine town. Frequent variation and vertical breaks in design and setback could give the appearance of a collection of separate structures, as has been done very successfully with the façade of the Mammoth Mountain Inn addition over the Inn's parking garage. Much of the North Village plan design, however, is uniform and strongly horizontal, which is not consistent with the look of a "village". The newly adopted North Village Design Standards may animate the street level, but the visual impact of the complete building is just as important for attracting visitors and residents over the long-term. **16G**

Buildings W-1 and W-3 are massive and rectilinear with very little variation in height and setbacks. Facades are shear and do not step back. Windows and balconies are consistently lined up and regular. These strong horizontal elements contribute to the buildings' bulky appearance, which even clad in rustic materials, cannot be disguised.

The bottom two floors at the south entry of W-1 have a pronounced (and very attractive) vertical presence but the long horizontals of the balconies, windows and roof line above negate the effect. **16G**

Building W-2 on the Minaret side does a good job with variation of façade and stepbacks, but on the plaza side the building façade is absolutely flat.

Thus, in our opinion, these three massive buildings do not give the desired impression of a village nestled in the forest that grew over time.

BUILDING HEIGHT

In the elevations, building heights appear to be nearly uniform. Many of us have wondered what happened to the 1994 NVSP recommendation that if a building is increased in height, there has to be a corresponding decrease in height in another building. While we appreciate the problem with roof pitch and undesired snowshed, the resulting "skyline" is uniform and predictable. **16H**

For the reasons stated at the beginning of this letter, we of P.E.S.T.E.R. care deeply about Mammoth's future economic prosperity. We want the North Village development to be the very best possible and succeed. We think the basic site design is good (as long as views and solar access aren't blocked by W-3) particularly with respect to planned Phase II on the east side. If the building facades could be re-examined to transform much of the horizontal uniformity into vertical variation, it is very likely the project would easily meet the criteria of "a small village that has developed over time".

On behalf of the supporters of Preserving the Eastern Sierra Tradition of Environmental Responsibility, I am

Sincerely yours,
Elizabeth Tenney

Response to Comment No. 16

Elizabeth Tenney, Preserving the Eastern Sierra Tradition of Environmental Responsibility
September 20, 2000

16A. The traffic model developed by the Town for planning purposes makes several critical provisions regarding skier capacity and parking. Skiers are projected at 24,000 skiers at one time (SAOT) for Mammoth Mountain and 8,000 SAOTs for Sherwin Mountain. Existing parking constraints at the Main Lodge and other ski portals were also incorporated. A winter transit system, including the gondola, is also included. This volume of skiers and visitors has been demonstrated, through application of the Town's traffic model, to be accommodated at an appropriate level of service by the Town's transportation system.

16B. Comment is noted by the Town of Mammoth Lakes.

16C. A tree replacement plan must be provided with each development project. Protection of trees is addressed during grading permit review. The Town has asked for "barrier" fencing in the past to protect the root zone of the trees. The gondola easement was reviewed in the 1991 EIR for North Village. Mitigation Measures 4.4-1a - 4.4-1c address impacts which include tree preservation. The 1999 Draft EIR includes Mitigation Measures 5.3-1g through 5.3-1i.

16D. View corridors would be established when specific projects are proposed. While views and solar exposure are desirable for all units and for all outdoor spaces, it is not possible for all units and spaces to face south and have a view.

16E. Short- and Long-Term Noise Impacts have been adequately analyzed in the Draft EIR. Since the commentor does not provide specific reasoning for disagreeing with the short- and long-term analysis, no additional response is required.

With regard to noise associated with outdoor music events, the analysis is included in Section 5.6 of the Draft EIR. The analysis states that the project results in onsite noise and that stationary noise impacts can be mitigated to less than significant levels.

16F. As stated in the Significance Criteria discussion, a significant light and glare impact would occur if a project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Although the orientation of the structures has been redesigned when compared to the 1991 and 1994 conceptual development plans, light sources would be required to be directed away from adjacent uses and light sources within the Plaza area would be required to be directed toward on-site uses. Implementation of mitigation measures from the1991 EIR and 1994 EIR Addendum are also included in this Section, together with standard Town Code

requirements regarding the use of directive lighting, would reduce potential impacts to less than significant levels.

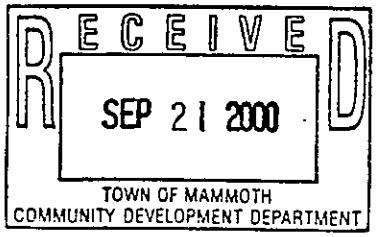
16G. Section 5.3 of the Draft EIR includes a detailed review of building setbacks and heights in order to evaluate the visual character associated with the project. The analysis concludes that the project would degrade the existing visual character and quality of the site and its surroundings by changing height and building setbacks within the Specific Plan area. Impacts would be reduced to a less than significant level with implementation of project design measures and implementation of recommended mitigation measures to maintain minimum setback and height requirements.

16H. The Specific Plan Amendment continues to have the provision that requires a project to decrease height below the maximum permitted height if an increase in projected height is requested. As with all height standards throughout Town, an owner is entitled to the maximum permitted height. Design review is the process which will determine whether the height of structures is appropriate.

INTRAWEST

COMMENT NO. 17

HAND DELIVERED



September 21, 2000

Ms. Karen Johnston
Senior Planner
Town of Mammoth Lakes
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Mammoth Lakes, CA 93546

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Dear Karen:

Our comments on the Draft Subsequent Program Environmental Impact Report for the North Village 1999 Specific Plan Amendment are attached. These comments include excerpts of letters from LSA regarding noise, air quality, and traffic.

Sincerely,

Ed Brisson
Director of Development

EB:mi

Enclosures – 16 pages

Page No.	Comment	
3-20 to 3-21	The proposed NVSPA requires use permits for freestanding parking structures, except as noted in the NVSPA. Table 3-3 should be revised accordingly. The table currently shows such structures as permitted uses in public and quasi-public areas.	17A
3-28	The second sentence in the second paragraph under "Design Requirements" should be deleted or modified. Basic design requirements are retained in the proposed NVSPA.	17B
5.1-8	The second paragraph on this page identifies free standing parking structures as a conditional use. See the comment noted above at page 3-20.	17C
5.2-17	The text under 5.2-3 should be revised to be consistent with the proposed NVSPA text which references *multi-family* residential units historically rented within the affordable range.	17D
5.3-14 to 5.3-15	The single asterisk note on Table 5.3-2 is incorrect. The proposed NVSPA has similar provisions as the 1994 Plan regarding offsetting heights below the permitted height. This note should be revised or deleted. The table includes a double asterisk note regarding an additional height bonus of 12' that is not included in the heights shown in the table. To avoid confusion and accurately compare maximum heights between the 1991, 1994 and proposed 1999 plans, this note should be deleted or revised and the table should include the added 12' where applicable. The "use/location" column of Table 5.3-2 indicates "Commercial Only" for several 1999 locations. Figure 1 of the proposed NVSPA shows these as "Commercial/Retail Use Areas". The table should be revised accordingly as these areas may include accommodation units.	17E
5.3-18 to 5.3-19	The text of mitigation measures 5.3-1a, 5.3-1c, 5.3-1e, and 5.3-1h should be coordinated with the text contained within the proposed NVSPA.	17F
5.4-57	Mitigation measure 5.4-6 should require participation in a town-wide winter transit system to achieve the ridership levels assumed in the MTM. Participation beyond the winter system is not justifiable as mitigation.	17G
5.5-17	Mitigation measures 5.5-3a and 5.5-3b: These mitigation measures are overly prohibitive and should be revised. Development with appropriate designs and uses may reduce the impact of projected CO levels and, therefore, allow development within 50 feet of the intersection.	17H
5.5-16 to	Mitigation measure 5.5-2a requires that commercial use tenants provide, at a minimum, certain facilities. This may not be feasible at a tenant level, although some compliance	17I

Page No.	Comment	
5.5-17	may be possible at a project level. For example, individual store tenants do not usually provide secure bicycle storage areas or bus turnouts.	17I
5.5-17	New mitigation measure 5.5-2b: We do not object to the concept of new development contributing to the cost of the Town's street sweeping operations in order comply with applicable governmental standards. However, all new development must contribute and the implementation of the mitigation measure must be based upon appropriate data, modeling and studies.	17J
5.6-19	The last phrase in the carryover paragraph at the top of page 5.6-20 should refer to "adjacent residences outside of a master planned area". The same change should be made in the third line of the first paragraph at the top of page 5.6-21.	17K
5.10-9	The quote from the 1991 EIR which appears as the last paragraph on this page should be deleted or clarified. This is no longer relevant due to the re-alignment of Canyon Blvd.	17L
5.10-10	The reference to the "closing of Canyon Boulevard" should be deleted or clarified. Neither the 1994 nor the proposed 1999 plans anticipate the closing.	17M
5.10-24	Mitigation measure 5.10-1a and 5.10-2: The expansion and upgrading of emergency services facilities is a town-wide issue that should be addressed on a town-wide basis through appropriate amendments to the DIF ordinance and/or bond financing. The imposition of this mitigation measure to collect contributions from North Village landowners alone would impose an unfair burden on those landowners to the benefit of landowners outside the specific plan area. Therefore, this mitigation measure should be eliminated.	17N
5.10-25	Mitigation measure 5.10-4b: To the extent that this mitigation measure refers to privately owned and maintained areas to which the public has access, such as the plazas, we support this mitigation measure. However, if the mitigation measure refers to the maintenance of public improvements or properties by private landowners, we do not support this measure. The maintenance of public properties and improvements is the responsibility of the Town or relevant public agency.	17O
5.10-18 to 5.10-19	The discussion regarding the criteria for determining whether a recreational amenity is eligible for credit appears to change that contemplated in the 1994 NVSP. The 1994 plan specifically mentioned "the events arena, the pond adjacent to the west side plaza areas, etc.", but did not appear to anticipate these to be "dedicated to the public by fee title or easement and not funded through DIF revenue".	17P
5.10-19	The first sentence of the last paragraph on this page states that the 1999 Specific Plan Amendment would increase the quantity of wastewater which is attributable to the project site. This should be clarified to explain that the increase is noted when compared to existing conditions, not to the existing Specific Plan which should be the focus of the analysis. The same impact occurs with the 1991 and 1994 Specific Plans. The	17Q

Page No.	Comment	
	wastewater (sewer) impact analysis should include a comparison to the existing Specific Plan.	17Q
5.10-21	The impact analysis relating to water does not include a comparison to the existing Specific Plan.	17R
5.10-23	The solid waste impact discussion also does not include a comparison to the existing Specific Plan. Also, the finding in Section 5.10-9 does not state an appropriate significance criteria when it indicates that development of the project area may result in increased solid waste generation. The significance criteria appear on pages 5.10-12 to 5.10-13.	17S
5.10-26	Mitigation measure 5.10-8: The second sentence of this measure is unnecessary.	17T
5.10-26	Mitigation measure 5.10-9. This mitigation measure should be revised to include only the first paragraph. Subsequent text simply reiterates requirements of the SRRE or other existing requirements that may change over time.	17U
5.11-1	The introduction to this section does not describe that it is intended to focus on changes in the project or changes in conditions.	17V
5.11-8	New mitigation measure 5.11-1e requires cessation of grading "until resources have been completely removed". This should be modified to provide for an appropriate level of mitigation, in a manner similar to the mitigation measures which appear at 5.11-1b and 5.11-1c, so that total removal, regardless of the level of significance and the consequences, is not required.	17W
6-2	The section on growth-inducing impacts should clarify that no new impacts are anticipated when the 1999 Specific Plan Amendment is compared to the existing Specific Plan.	17X
7-4	In the second line of the third paragraph, change "districts" to "designations".	17Y
7-5	The conclusion under the heading "Comparison to 1999 Specific Plan Amendment" is incorrect. It should compare the impacts of the 1999 Specific Plan Amendment to the existing 1994 Specific Plan.	17Z
7-1 to 7-23	Similarly, to the extent the conclusions in the impact analysis of the DEIR (Chapter 5) are changed, conforming changes throughout Chapter 7 must be made.	17AA
7-15	The comparison to the 1999 Specific Plan Amendment under "Public Services and Utilities" should be revised. The conclusion in the second sentence that the previously identified impacts would no longer occur is not the result of "changes in CEQA significance thresholds."	17BB

Page No.	Comment	
8-1 to 8-27	To the extent the mitigation measures in the DEIR are changed, conforming changes must be made to Chapter 8.	17CC
9-1 to 9-3	To the extent changes are made to the list of impacts in Chapter 5 of the DEIR, conforming changes must be made to Chapter 9.	17DD

Response to Comment No. 17
Ed Brisson, Director of Development, Intrawest
September 21, 2000

17A. Page 3-21, Table 3-3, Item 9, in the Draft EIR has been revised in the Final EIR to show Freestanding Parking Structures as subject to a Use Permit.

17B. Page 3-28, Paragraph 2, of the Draft EIR has been deleted in the Final EIR.

17C. Page 5.1-8, Paragraph 2, Line 7, of the Draft EIR has been revised to include Public and Quasi-Public uses in the Final EIR.

17D. Page 5.2-7, Paragraph 4, has been revised as follows:

5.2-3 *Project implementation may result in the displacement of existing housing necessitating the provision of replacement housing elsewhere. The 1999 Specific Plan Amendment requires that the developer of a project which displaces any permanent residents from multi-family residential units which were historically rented to individuals within the range of affordable housing rents, shall provide a sufficient number of bedrooms to house the same number of permanent residents displaced by the project, in a similar unit type, and at rents maintained within the affordable range. This provision reduces this impact to a less than significant level.* ~~*all displaced permanent residents of removed affordable housing have replacement housing provided elsewhere. This provision reduces this impact to a less than significant level.*~~

17E. The single and double asterisks in Table 5.3-2 have been deleted in the Final EIR. All "commercial only" references in Table 5.3-2 have been revised to read "Commercial/Retail" Use Areas" in the Final EIR.

17F. The following mitigation measures have been revised for the Final EIR:

5.3-1a *(Measure modified from Mitigation Measure 4.11-1(a) in the 1994 EIR Addendum):* To the maximum extent ~~feasible~~ practical, the proposed project shall retain forested areas, and the development shall remain subordinate to the natural character of the site and surrounding landscape.

5.3-1e *(Measure restated from Mitigation Measure 4.11-1(f) in the 1994 EIR Addendum):* To the maximum extent ~~feasible~~ practical, native trees and landscaping shall be concentrated around all structures located on the project site.

5.3-1h *(Measure restated from Mitigation Measures and 4.4-1(b) and 4.11-2(b) in the 1994 EIR Addendum):* To the maximum extent ~~feasible~~ practical, existing trees located along the gondola easement shall be retained. Replacement trees, in addition to those existing, shall be planted adjacent to the gondola easement (with property owner approval) in order to create a buffer that will protect privacy and minimize visual impacts on affected properties.

17G. Page 5.4-57, Mitigation Measure 5.4-6, has been revised in the Final EIR as follows:

5.4-6 (*New Mitigation Measure*): New development shall participate on a fair share basis in the development and operation of a community-wide winter transit system to achieve the ridership levels assumed in the MTM.

17H. Based upon the analysis conducted for the 1991 EIR, an exceedance of the 8 hour standard for CO would occur thus justifying the recommended mitigation at Minaret Road and Main Street. Mitigation Measures 5.5-3a and 5.5-3b have been revised as follows:

5.5-3a (*Measure modified from Mitigation Measure 4.8-3 in the 1994 EIR Addendum*): Development shall be prohibited within 50 feet of the Old Mammoth Road and Main Street intersection unless alternatives to setbacks acceptable to the Town of Mammoth Lakes are incorporated.

5.5-3b (*New Mitigation Measure*): Development shall be prohibited within 50 feet of the Minaret Road and Main Street intersection unless alternatives to setbacks acceptable to the Town of Mammoth Lakes are incorporated.

17I. The measure listed in Mitigation Measure 5.5-2a is pursuant to the Air Quality Management Plan for the Town of Mammoth Lakes and Chapter 8.30 of the Town's Municipal Code.

17J. Mitigation Measure 5.5-2b of the Final EIR has been revised as follows:

5.5-2b (*New Mitigation Measure*): Each project shall contribute on a fair share basis to the Town's street sweeping operations in order to reduce emissions and achieve the required Federal standard.

17K. The commentor's reference to the requested revision on page 5.6-20 is unclear. With regard to the requested change on page 5.6-21, the Town believes that the existing text accurately reflects the analysis presented in that paragraph.

17L. The citation referenced is intended to merely recite the conclusions rendered in the 1991 EIR.

17M. Refer to response to comment 17L.

17N. The mitigation is a fair share contribution and although there are town-wide implications, a nexus exists between the proposed project and the need for emergency services facilities.

17O. Comment is noted by the Town of Mammoth Lakes.

17P. Comment is noted by the Town of Mammoth Lakes.

17Q. Page 5.10-19, Paragraph 4, Line 1, has been revised as follows:

The 1999 Specific Plan Amendment would increase the existing conditions quantity of wastewater generated within ~~which is attributable to~~ the project site.

17R. The water analysis contained in Section 5.10 of the Draft EIR accurately analyzes project impacts related to water.

17S. The Solid Waste analysis contained in Section 5.10 of the Draft EIR accurately analyzes solid waste impacts which are based upon the Significance Criteria presented on Page 5.10-13 of the Draft EIR.

17T. The second sentence of the mitigation measure 5.10-8 is pursuant to discussions with the MCWD and is recommended to be retained as is.

17U. Since the text description in paragraph 2 of Mitigation Measure 5.10-9 is a typical requirement of the Town's SRRE and will not modify impact conclusions, that paragraph has been deleted from the Final EIR.

17V. As stated in the Introduction of Section 5.11, based upon the prior EIR findings, it was determined that further analysis of potential impacts to Cultural Resources was not required. Section 5.11 is a summary of the data provided in the 1991 EIR. The section is provided in order for the Subsequent Program EIR to serve as the primary EIR reference for future development within the Specific Plan area.

17W. The analysis contained in Section 5.11 supports the wording of mitigation and no changes are warranted.

17X. The analysis in Section 6.3 is based upon existing conditions at the time in which the NOP was issued by the Town. This comment does not warrant changes in the analysis.

17Y. The wording on Page 7-4, Paragraph 3, Line 2, has been revised from "districts" to "designations."

17Z. The wording on Page 7-5, Paragraph 3, Line 1, has been revised from "1999" to "1994."

17AA. Comment is noted by the Town of Mammoth Lakes.

17BB. The analysis presented on Page 7-17 of the Alternatives Section is correct and does not warrant changes.

17CC. Comment is noted by the Town of Mammoth Lakes.

17DD. Comment is noted by the Town of Mammoth Lakes.

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SEP 21 2000
TOWN OF MAMMOTH LAKES
PLANNING DIVISION

COMMENT NO. 18

Date: September 21, 2000
To: Karen Johnston, Senior Planner
Town of Mammoth Lakes
Re: Draft Subsequent Program Environmental Impact Report for the North Village 1999 [2000] Specific Plan Amendment [EIR]

Thank you for the opportunity to comment on the above-referenced EIR.

In addition to my comments here, please consider as reference my written comments dated October 20, 1999 (in the EIR Appendices), my oral comments before the Planning Commission on September 13, 2000, and my notations of significant differences between the 1999 and 2000 Specific Plan amendments (attached).

The EIR was completed on August 4, and a *Revised* North Village Specific Plan (2000 NVSP) was submitted to Town staff in July *without* a redline copy to indicate what changes had been made to the 1999 NVSP. Last-minute and unidentified changes to the 1999 Specific Plan limit the opportunity for intelligent comment by the public and commenting agencies. It is not clear to me that the recent changes were analyzed and addressed in the EIR. My findings (see attached) indicate to me that word and phrase *deletions*, *substitutions* and *additions* will significantly affect traffic circulation, air quality, visual, and other impacts. They need to be addressed.

I cannot support the currently proposed 1999/2000 NVSP. Considering the quality of life impacts associated with it, as well as with the 1994 NVSP, a serious community discussion needs to take place on the pros and cons of the Reduced Density Alternative. In addition to reducing impacts up to 30 percent, this alternative would allow time to implement and determine the effectiveness of mitigation measures, and to address potential problems *before* they happen. For example, the viability of Dry Creek as a new water source required for buildout could be determined prior to rather than after the fact (see EIR p. 15-7, *deleted* 1994 mitigation measure 4.6-2(b).

Transit System (Traffic/Circulation)

A town-wide transit system is mentioned in the EIR as an important mitigation factor in reducing impacts. Its importance is emphasized in the Department of Transportation letter [Responses, EIR Appendices]: "In order for this specific plan area and indeed, the entire town to operate as proposed, a significant *increase* in transit usage (and headway/Capacity) will need to be obtained. . . ." Despite this expressed need for transit, significant changes to the 1999 NVSP in the 2000 version raise the specter of a much-delayed and/or limited transit system, if there is one at all: For example in the 2000 Plan: "*year-round*" is deleted from "[A] . . . town-wide transit system is vital to reduce vehicle use." "A *year-round*, town-wide transit system *shall be* in operation...." is

18

replaced by "The Town *intends to* establish, maintain, and operate a Town-wide transit system. . . ," and "if" is added to the following: "*IF* the Town establishes a Town-wide transit system. . . ." [see attached]. What's going on here? These changes and their potential impact on traffic and air quality need to be addressed in the EIR. 18A

Mitigation measure 5.4-6 refers to the participation of new development on a fair-share basis in development and operation of a community-wide transit system. I strongly believe that all mitigation measures involving fair-share contributions (including Fire Protection mitigation measure 5.10-1a) need to be *in place* with agreed-upon amounts and method of payment *before* project approval or issuance of a building permit. 18B

Air Quality

Based on my reading of the air quality standards and current and future impacts, I feel stronger mitigation measures are required. I specifically refer to pages 5.5-10 & 11, and Table 5.5-2 in the EIR. To exceed federal and state air quality standards to the level that is indicated is unacceptable. What "overriding consideration" is more important than people's health? 18C

What further impact to air quality would occur if traffic impacts are NOT mitigated by a transit system? See *deleted* 1994 mitigation measure 4.8-4 (p. 15-12) which states the need to implement transportation plans to attain the goals of reducing PM10 emissions.

Visual Character—Changing Our Community's Values.

It is clear from the text on pages 5.3-7 and 5.3-8 that, with changes to the 1994 height and setback requirements, the existing visual character and quality of the area will be "substantially degraded" and conflict with the visual quality established by the General Plan and Vision Statement. This is in clear disregard of our community values. Of special concern is the lack of opportunity for community input during Design Review. Section 4.7 of the Advisory Design Panel Procedures states: "All meetings of the Advisory Design Panel are closed to the public; however, the applicant and/or its representative(s) may appear as a delegate to speak to his/her proposal and attend for that portion of the discussion which concerns his/her application." The Panel, appointed by the Community Development Director, sends its recommendations to the Planning Commission for its decision. Prior to this, there is little or no time for the public to become informed of the development proposal or status of design review. Current proposals for Phase I indicate that recommended mitigation measures will be ignored. 18D

Trees, Views, Small Town and Alpine Character

The Town's General Plan includes references to the "unique natural character of the Town," "alpine character of the area," "retain to the maximum extent feasible, the forest canopy and forested character of the Town," "limiting removal of vegetation, particularly mature trees," "to protect the community's natural beauty (and resources)," and "retain the quiet rural alpine character of Mammoth Lakes." The 2000 NVSP's deletions of earlier plans' content is significant by comparison. These *deletions* include: "Existing trees shall be protected," "with building heights generally held at or below the height of surrounding trees," and "feels like a small town, grown over time." Retained in the 2000 plan, however, is the phrase "preserve views between and over buildings." 18E

However, considering the "suggested" building heights, mass, and design for Phase I, none of these important qualities and features are likely to be retained. Mitigation is weak and I have little faith in Design Review. 18E

Summer Traffic

There appears to have been no analysis of summer traffic and its impacts, yet summer visitations exceed those in winter, summer visitors tend to stay longer, and the gondola will have limited effect on reducing summer traffic. There is currently no summer transit, the Lakes Basin is already heavily impacted, and a "*year-round*" transit system has been deleted from the 2000 NVSP. Under these circumstances, should not an analysis be done to identify summer traffic impacts? 18

Vehicle Entry onto Primary Roads

I found no analysis in the EIR on the impacts associated with vehicle entry onto primary roads from connector and other roads or entrances. At certain times (around noon and 5 p.m.) on winter and summer weekends, holidays, and to a lesser extent weekdays, left- and sometimes right-hand turns onto, for example, Old Mammoth Road (from Sierra Nevada Road) or Main Street (from Laurel Mountain Road) are difficult. These are not short waits; they can take up to 10 minutes or longer. The solution has been to take longer, more circuitous routes requiring only right-hand turns. During these "impacted" times, many drivers turn left off of Laurel Mountain Road onto the frontage road, drive west to Perry's and then turn right onto Main Street in order to get to the post office. With the Town accepting a lower level of service (LOS)—D, the current impacts will increase in frequency and difficulty. Should not these traffic impacts which will only increase with growth be analyzed in this EIR? Or is it unnecessary to identify impacts when mitigation measures are not needed (i.e., deleted) due to lowering the standards as the Town has done with LOS D? 18

Housing.

The General Plan refers to "employee housing close to employment centers." Contradicting this and the stated desire (policy?) to disperse employee housing throughout town is the *deletion* of employee housing requirements in North Village. Instead, they are only "encouraged." Stronger and more specific mitigation measures (requirements) are needed. Originally, 100% of the housing for employees generated by uses within the project were required to be provided onsite. A 50% requirement is not unreasonable. 18

Building Heights.

"Modulation" in roof or ridgeline is measured in inches and feet in the 1999/2000 NVSP, while variation in building height in the approved 1994 NVSP is measured by *floor levels* as shown in Exhibit K. To say that building massing is roughly similar is highly misleading. The 1994 footnote on reaching "projected height" was reinstated in the 2000 plan but re-worded with the result that the "1999 Specific Plan 18

Amendment would allow more of each building reaching the higher end of the total height range" [p. 5.3-15]. This is unacceptable.

Trees.

Mitigation measure 5.3-1b—tree preservation and replacement plan—calls for "type, size, number and location of *replacement* trees" with no reference to *existing* trees. *Deleted* from the mitigation measure: "Trees shall be replaced on a one-to-one basis with as many trees retained onsite as possible." Recent artist's renderings of Phase I reveal no existing large trees. The mitigation measure needs to be strengthened. Clear-cutting the site is not acceptable. Providing a "buffer" around the edges of the project should not be in lieu of retaining trees within the project. **18J**

Recreational Facilities.

"Recreational facilities (activities)," a goal of the General Plan, are mentioned frequently in the EIR. However, deletion of the "arena," a major activity center, from the NVSP appears to leave only the "pond" as meeting that goal. What and where (within the project) are other recreational facilities? **18K**

At what point do negative impacts to our quality of life become *unacceptable* to the community?

Attachment

Pat Eckart, 8/28/00

Latest Changes to the North Village Specific Plan

To understand the following "notes" requires having 1) the 1999 Revised NVSP with crossouts and underlining of 1994 NVSP and 2) the August 2000 Revised NVSP (i.e., amendments). However, notations for pages 19, 56, 57, 61, 62 speak for themselves as to employee housing, future transit system and skier parking at NV. Overall, there are few significant changes between 2000 and 1999, most to Intrawest's advantage. However, two new sections noted on page 68 appear positive for the community. The most significant changes were to the 1994 plan. Many changes raise the questions "why?" and "what does the change mean?"

Changes (with page numbers) are noted as (2) or (3) to indicate reference; for example: "No changes" [pp. 2-9 (3)] means the 2000 version; (2) means the 1999 version (with crossouts & underlining)]. Minor word changes have been omitted.

Page 10 (3): Specific Plan Objectives. "conceptual plan" replaced by "development plan"; however, "conceptual" is retained for "site plans." [p. 16 (2)]

Concept. Re-added from 1994 [p. 16 (2)]: "Building 'expressions' are to be generally vertical rather than horizontal in form and . . . ." ["expressions" added in 2000.]

18L

Page 11 (3): Concept. Last sentence expanded to include reference to "Design Standards..." [p. 17 (2)]

Page 16 (3): Development Objectives (all areas of NV).

1. After "ambiance" is added: "with building expressions that appear vertical, not horizontal." [p. 23 (2)]

4. "maximize sunlight" has been replaced with "emphasize sunlight."

8. "as feasible" changed to "as practical." [(2), p. 24)]

Page 17 (3): (within Pedestrian Core area):
4. Re-added "covered and uncovered bus drop off zones." [(2), p. 26]

5. After "create mixed-use buildings" added "with multiple levels. . ." [Note: deleted 1994's "keep them at one to four floors in height."]

West side and East side--[see page 26 (2)—note 1994 deletions]

Page 18 (3) Land Use Policies, Overall:
6: Deleted "The [landscape] Plan shall be approved by the Planning Commission" [p. 27 (2)]

9. Re-written. Compare with p. 27(2). Deleted reference to "protecting existing trees." [Will there be any existing trees in the "programmed activity area" or resort plaza area?]

Page 19 (3) Land Use Policies, Overall, 12. is new: "Development of employee housing within North Village is encouraged." [not required?]

Land Use Policies, Plaza Resort, 3.: Added "hotels or multi-family lodging, some of which. . . ." [p. 28 (2)]

PR, 5. [note what was deleted from 1994 plan]. [p. 28 (2)]

Resort General 3. [Why so many restaurants? Impact on local cafes?]

Page 20 (3) Land Use Standards and Implementation Measures. [note deletion from 1994 Plan: "All development . . . shall be in general conformance with Exhibits . . . . " [p. 30 (2)]

Plaza Resort Planning Areas—Land Use. See Figure 1, p. 21 (3)

18L

Pgs 22-23 (3) 1. Gondola Building/Skier Services. Re-worded. Deleted "No day use skier parking will be provided at the ski lift . . ." Use permit application number changed from 88-1 to 90-3. Deleted reference [p. 31 (2)] to "10,000-30,000 SF" for gondola building and day lodge. Instead noted "20,000 SF" of commercial space (day lodge) with no space calculation for gondola, gondola service areas and restrooms.

2. Pedestrian Oriented Mixed-Use. Deleted "up to 5 floors" after "buildings vary in height" [p. 31 (2)] [Note: no reference to underground parking!]

4. Resort Lodging. Added "as appropriate" after "incorporated into building designs" and deleted "Proposed building heights will be mitigated by the surrounding forest canopy." [p. 32 (2)]

5. Public Parking. Re-worded. Deleted "no dayskier parking would be allowed." [p. 32 (2)] Residential and/or community serving uses atop the [parking] structure" are now "encouraged" instead of "available." A pedestrian bridge is now "desirable" instead of "possible." Added new sentence: "Alternately and in lieu of its use for public parking, this site may be incorporated into site 4 (above) [Resort Lodging], except building heights shall be one to four levels."

6. Perimeter Sites. Re-added to first sentence: ". . . from one to three levels."

7. Quasi-Public Use (new). Replaces deleted Events Arena area and adding Community Center area and public parking facilities.

Page 26 (3) 1. Land Uses. Sentence deleted: "Uses requiring a use permit shall be subject to the administrative requirements of this document." [p. 36(2)]

Page 27 (3) Table 2: Land Use Matrix, 10a "Timeshare units" changed from "Subject to Use Permit" to "Permitted Use." [p. 37 (2)]
20. "Freestanding Parking Structures" under Plaza Resort changed from requiring a use permit to permitted use in added footnote, "Note 1: The freestanding public parking structure shown in Figure 1, Area 5 [by gondola] shall be considered a Permitted Use without a use permit."

Page 28 (3) Density. Added sentence at end of "b": "Density bonuses for inclusion of affordable housing shall be in accordance with the provisions of the Municipal Code." [p. 38 (2)]

Item "e.i,a": Re-written and in item "e.i,b" the words "and the SL portions of parcels 21 and 28" are deleted.

Page 29 (3) Density. Item "e.i.c" is new: "Density from the ski-back trail Parcel "A" may be transferred to other PR parcels."

Item f.iii is deleted. "Evidence of the recordation of i. or ii. shall be presented along with development plans to the Town." [p. 39 (2)].

Page 30 (3) Building Heights. [Note: the *floor level* designations shown in the 1994 Exhibit K are deleted and not replaced in any other exhibit.] [p. 41 (2)]

Page 31 (3) Table 4. Building Heights." Added: "Pedestrian Core Overlay area (excluding PR Planning Areas, 1-4 building levels, 50' maximum permitted height, 80' maximum projected height." Both RG and SL maximum permitted and projected heights reduced by 10 feet. [p. 42 (2)]
*Re-added but *worded differently* was the "roughly equivalent reduction" sentence (paragraph). In 1994 it read: ". . . provided that a roughly equivalent reduction in building height *below the permitted height* is designed into the building. . ." That section now reads: ". . . provided that a roughly equivalent reduction in the building *footprint area above the height* is provided below the permitted height. . . ." [What does the second (current) one mean?!!]

Note changes in wording of item "d" ("b" p. 42 (2)). New sentence added at end: "Due to the steep slopes adjacent to and beneath the proposed Lodge B shown in Exhibit E, the Maximum Permitted Height for this lodge shall be set at elevation 8130, but no further increases for garage height shall be allowed."

Item "e" ("c" and "d" p. 42): Plaza and parking garages "no more than 20 feet above natural grade. . . ." [back to 20 from 15 feet in 1999]. After "A freestanding parking garage may exceed this limit" is added "but shall meet Permitted and Projected Height Standards." Also, "Roof appurtenances may project above the *maximum height limits*. . . ." was changed to ". . . may project above the *Projected Height up to 3 feet*. . . ."

Item "f" ("e", p. 42): [Note "substantial number" replaced "50% of affordable housing units. . . ."]

Pgs 32-33 (3) Building Setbacks, item f--a, b, c:—newly added.

Page 33 (3) Table 5: Setbacks. Changes. See chart [p. 44 (2)];

Building height:	25'-34',	35-54',	55'+
Specific Plan Year	'94-'99'-'00	'94-'99'-'00	'94-'99'-'00
(underlined figures are current revisions)			
Minaret:	20'-10'-20',	30'-10'-30',	75'-15'-40'
Lake Mary/Main:			75'-35'-40'
Canyon Blvd Realign	20'-10'-20',	30'-10'-30',	75'-15'-40'
Forest Trail			75'-35'-40'
Hillside/Lakeview			75'-35'-40'
Berner			75'-35'-40'
Spec.Plan Boundaries			75'-35'-40'

18L

Page 34 (3) 9. Building Design a.: "noticeable change" replaced "substantial change" in first sentence. [p. 45 (2)]

Page 39 (3) 20. Snow/Ice Removal & Storage, b.: ". . . approval of the Community Development Director" replaced "approval of the Planning Director." [p. 51 (2)]

Page 41 (3) 26. Public Art/Events, b.: re-added "public events program may be developed . . . ." [p. 54 (2)]

Page 43 (3) Grading Standards, 15.: "Town Community Development Director" replaces "Public Works Director." [p. 56 (2)]

Page 44 (3) Landscaping & Revegetation, 16.: After ". . . shall be replaced on a one-to-one basis" was added: "either on-site or on an off-site location approved by the Community Development Director." [p. 57 (2)]

Page 49 (3) Public Facilities Policies, 3.: "Town Community Development Director" replaces "Public Works Director." [p. 64 (2)]

Page 50 (3) Utilities, a.: Added: "All new or realigned utility lines shall be placed underground unless such placement results in a greater quantity of utility poles." [p. 65 (2)]

Page 51 (3) Snow Removal, e (new): "Snow removal from private vehicular and pedestrian areas is the responsibility of the property owner and/or maintenance district."

Page 54 (3) Proposed Circulation Improvements. First sentence: ". . . based on the North Village Conceptual Site Plan attached as Exhibit D . . . ." [p. 69 (2)]

Re-added in 3.: ". . . including improvements to the Hillside Drive intersection, if required by traffic studies."

10. (is new).: "Construction of a ski-back trail."

Page 55 (3) Minaret Road, j (new): "North of Forest Trail: One travel lane each direction." [p. 71 (2)]

Forest Trail, b.: Changed to read: "Access to Parcels 25 and 27" and deleted "parking structure." [p. 73 (2)]

Page 56 (3) Participation in Transit System, first sentence: removed "year-round" from "town-wide transit system"! [p. 75 (2)]

Page 57 (3) Participation in Transit System. Added: "If the Town establishes a Town-wide transit system, . . ."

Parking, d.: New sentence added: "The parking spaces required for uses within the North Village Specific Plan are set forth below and such requirements supercede the parking standards specified in the zoning regulations and Municipal Code." [p. 76 (2)]

Page 60 (3) Circulation Standards, General, 1: "Public Works Director" replaced in the following sentence: "Phasing of public improvements shall be approved by the Community Development Director." [p. 80 (2)]

Specific Street Standards, 1a. Minaret Road. The following was deleted: "The Minaret improvements adjacent to eastside development shall be completed prior to the occupancy of the first new mixed-use development in the eastside plaza area." [p. 80 (2)] [note: Improvements to Millers Siding Road prior to opening of the first hotel in the west plaza area was deleted in the 1999 version [p. 81 (2)]

Page 61 (3) Parking, 3.: Changed "Day skier parking shall not be provided in public parking facilities in North Village. . . ." to "Day skier parking in public parking facilities shall be permitted only to the extent that excess commercial parking capacity is available." [p. 82 (2)]

Page 62 (3) [Note: 1999 version *deleted* the prohibition against "On-street parking...from Town rights-of-way along Lakeview Blvd.,Rainbow Lane and all other Town residential streets in the vicinity of Warming Hut II

during winter months upon commencement of operation of the gondola" [p. 82-3 (2); would have been #8 on page 62 (3)]

Parking [below #9 on p. 83 (3)]: Deleted "A parking district may be formed to create and maintain public parking for new development in the PR zone. Parking shall be provided in multi-level structures under buildings and in freestanding structures."

Transit, 1.: "A *year-round*, town-wide transit system *shall be* in operation..." is replaced by "The Town *intends* to establish, maintain, and operate a Town-wide transit system . . . ." Again, "year-round" is deleted. [p. 83 (2)]

Page 64 (3) Housing Element: [Note. Table 6, Estimated Number of Employees of North Village (1,495) deleted from 1994 plan, p. 85 (2)]

Page 65 (3) Housing Policies, 1.: [Note that deleted earlier was "equal to the demand created by their low to moderate income full-time equivalent employees." p. 86 (2)]

18L

Page 68 (3) 3. Method for Providing Housing. Two new sections, 3.1.4. Provision of Replacement Housing for Displaced Permanent Residents, and 3.1.5 Limitation on the Provision of Housing for Construction Workers were added, requiring renumbering of previous items.

Page 69 (3) 3.3 Alternate Housing Proposals. ". . . the *Town* may approve proposals which deviate . . . ." [Who specifically may approve proposals?]

Pgs 65-70 (3) Housing Standards deleted [pp 92-93 (2)]. Compare with Employee Housing Mitigation Policy (2000)

Page 75 (3) Noise Standards. [Note: Why was "Residential buildings will be constructed to meet the noise level requirements of the Town Municipal Code" deleted from 1994 NVSP?] [p. 99 (2)]

Page 78 (3) Phasing. [Note deletions from 1994 plan, particularly market analysis, impact on existing commercial uses, and market saturation.] [p. 103 (2)]

Page 80 (3) Project Implementation and Financing. [Note deletion of last paragraph from 1994 plan regarding public assistance related *only* to community-wide benefits and not those due to impacts of NV development.] [p. 106 (2)]

Response to Comment No. 18

Pat Eckart, Resident
September 21, 2000

18A. While a year-round community-wide transit system may provide transportation or air quality benefits, it is not required as mitigation or required to achieve minimum traffic levels of service.

A community-wide transit system is built into the Town's traffic model, specifically oriented around a winter Saturday condition. The technical foundation in establishing the winter Saturday as the basis for analysis is contained in the Intrawest Master Plan Traffic Impact Analysis (July 25, 2000) appendix, pages 11 and 12. In addition, an examination of year around traffic volumes was conducted in January, 1998, which confirmed that the typical winter Saturday, which occurs 15 to 20 times per year, is a reasonable worst case condition for environmental impact analysis. During the summer, only one weekend, Memorial Day, had traffic volumes approaching capacity. The general trend is that summer volumes are significantly lower than typical winter volumes, and also that the afternoon peaking characteristic of winter traffic is not apparent in the summer.

18B. Comment is noted by the Town of Mammoth Lakes.

18C. The analysis related to impacts and mitigation considers a future community-wide transit system as referenced in Mitigation Measure 5.4-6. The transit system is anticipated to be a part of the community, thus transit is a factor in the analysis. The commentor's reference to significant air quality impacts have been documented in Section 5.5.

18D. Comment is noted by the Town of Mammoth Lakes.

18E. Comment is noted by the Town of Mammoth Lakes.

18F. Refer to Response to Comment No. 18A.

18G. Several unsignalized intersections are analyzed in the traffic study, including, Kelly Road/Lake Mary Road, Lakeview Boulevard/Lake Mary Road, Center Street/Main Street, Forest Trail/Main Street, Meridian/Majestic Pines Drive, and Meridian/Azimuth. The specific analysis looks at the delay experienced by the minor street traffic in entering or crossing the main street. These intersections are selected and determined to represent a typical condition in the Town. In most cases, the delay to the minor street traffic does increase, and in some cases a traffic signal is considered as a potential

mitigation measure. In other cases, if alternate routes are available, such as the Meridian/Azimuth intersection, then traffic signals are not recommended.

Mitigation measures are recommended only when the potential for a significant impact is disclosed and they are based on the significance thresholds (i.e., levels of service standards) prescribed by the Town.

18H. The Specific Plan Amendment continues to allow but not require affordable housing within the Specific Plan area. The only zones not permitted to provide affordable housing for North Village projects are RMF1, Open Space and airport. This acts to disperse housing throughout Town and near all commercial (or within) districts.

18I. Refer to Response to Comment 18H.

18J. Comment is noted by the Town of Mammoth Lakes.

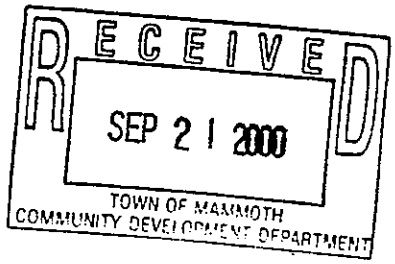
18K. Refer to Response to Comment 18H.

18L. Comments are in reference to the 1999 North Village Specific Plan and not the Draft EIR. No further response is required.

September 21, 2000

COMMENT NO. 19

HAND DELIVERED
Ms. Karen Johnston, Senior Planner
Town of Mammoth Lakes
Community Development Department
437 Old Mammoth Road
Mammoth Lakes, CA 93546



Re: Draft Environmental Impact Report for the North Village 1999 Specific Plan Amendment

Dear Karen:

I apologize for not discussing any of the enclosed issues with you before this submission but I only found out about the document and today's deadline last week. Also in that Planning Commission meeting of September 13th I first became aware that properties outside the "Pedestrian Core" were also included for changes to the 1991 Plan.

As you know the conceptual plan shown in Exhibit 3-4 was adopted in 1991 and the only changes made in 1994 were to the "Pedestrian Core" as shown in Exhibit 3-5. As an owner of one of those properties outside the "Pedestrian Core" I have believed for the last nine years that the graphic developed through years of planning in Exhibit 3-4 represents what could be built on those specific properties.

In thumbing through the 1999 EIR I was shocked to learn that a 100 ft. buffer on Lake Mary Road and Minaret Road was recommended as a mitigation measure for impacts to Visual Character in the 1991 Plan. As stated on Page 5.3-16 of the 1999 EIR this measure is "too vague to implement." This mitigation makes no sense for additional reasons – in effect the buffers would then serve to buffer the Plan properties from each other rather than from some adjoining single family neighborhood. Further, as shown in Exhibit 3-4 plans were in process to abandon certain portions of the 200 ft. ROW along Lake Mary Road. Discussions with then Director of Public Works Charles Karoly concluded that the maximum ROW the Town required was 80 ft which would make Lake Mary Road consistent with the previous ROW abandonment adjacent to Whiskey Creek restaurant. Is now the time to implement this ROW abandonment?

19A

For the above reasons Mitigation Measure 5.3-1m in the 1999 EIR still makes no sense and any reference to buffers on Lake Mary Road and Minaret Road should be eliminated. It is illogical that properties in the Plan on Minaret Road south of Lake Mary need to be buffered from each other while properties along Minaret Road in the more intensely developed area north of Lake Mary Road are not. We should decide what type of properties we should "buffer from" and it should apply consistently throughout the Plan. Mitigation Measure 5.3-1m goes on to recommend setbacks at the Specific Plan boundaries to be applied universally without regard to the character of the adjacent properties. Again, this is illogical if Transient Lodging buildings are built adjacent to other Transient Lodging buildings. I recommend that the Building Setbacks contained in Table 3-6 apply to all properties in the Plan except those which border single family neighborhoods and only those should require implementation of Mitigation Measure 5.3-1m. **19B**

With regard to Traffic and Circulation I strongly support the new design of Minaret Road with two lanes and the roundabout at Forest Trail. I was privy to the seminar given this past January by Dan Burden of Walkable Communities and the subject 1999 Plan (for a small portion of Minaret Road) implements many of the principles outlined in his book "Street Design Guidelines for Healthy Neighborhoods." But shouldn't these principles be applied throughout the Specific Plan area? I have traveled through the intersection of Lake Mary Road and Minaret Road thousands of times and noticed something peculiar several years ago when the Jazz Jubilee had the traffic signals turn to "flashing red." There was no delay even though traffic was being mixed with hundreds of pedestrians crossing in all directions. This phenomenon has been repeated several times when the signals were down for maintenance, achieving "LOS A" when the signals were acting as stop signs. There obviously is a case for having a long wait on those Saturday afternoons when the ski crowds travel down from Main Lodge, but isn't this the intent of getting people on to the North Village gondola and the Town Transit System? I recommend that a gradual elimination of street parking both in the Mammoth Slopes area and along Minaret Road at the Ski Area would do more to accomplish the objectives of the Specific Plan than applying Caltrans standards for signal implementation all over Town. I am opposed to any mitigation measure which increases the number of traffic signals but strongly support measures which gets people out of their cars and onto the Town Trail System. **19C**

Pedestrian circulation and access throughout North Village has been one of the basic tenets of the Specific Plan since its inception and is emphatically supported by Burden of Walkable Communities. We have a robust Town Trail System which is just now maturing and should be emphasized as mitigation for **19D**

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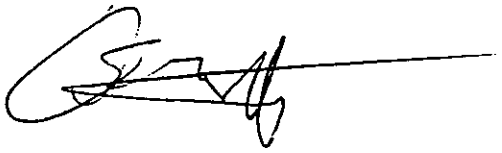
the task of moving people, not cars, throughout the Town boundaries as well as the North Village Specific Plan. I may have missed it in the EIR but I don't recall much mention of using the Town Trail System to mitigate Circulation impacts but a great deal of attention was applied to traffic signals. In addition, the 1991 Plan expended great effort in creating pedestrian paths throughout all of North Village ensuring easy access through adjoining properties to traverse all parts of the Plan. I don't see the same emphasis in the 1999 Pedestrian Core but it may come later at the design stage. I strongly support illustrating such pedestrian pathways in Exhibit 3-6 before its final approval. **19E**

A detail with which I am intimately familiar is the steep driveway serving the southern end of Building C shown in Figure 3-6. This has proven to be virtually unusable during heavy winter snows. As the owner of Planning Area 14 and easement Grantor I have the ability to move this easement and provide a much more feasible solution which is shared access across the driveway originating at Lake Mary Road several hundred feet west of the Miller Siding intersection as shown on Exhibit 3-4. This will provide a grade in the 4-5 percent range which is directly southfacing and obviously far superior. An additional comment is that the northerly property line of Planning Area 14 appears to have been reconfigured as shown on Exhibit 3-6 and no arrangements have been made to accomplish this. Please have the illustration corrected to reflect the current configuration. **19F**

My last comment is directed to building heights. It appears that maximum heights were chosen based on a 10 foot per floor module. With the reality of the marketplace dictating higher quality than we have previously built 9 and 10 foot ceiling heights with such features as coffered ceilings may become the future standard and I recommend that the EIR address this issue utilizing 12 ft per floor, i.e., 20 ft max. becomes 24 ft, 40 becomes 48, etc. **19G**

Thanks for your attention to this letter. I may be reached at 934-6813 or at P.O. Box 599 in Mammoth.

Sincerely,



Chuck Tomajko

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Response to Comment No. 19

Chuck Tomajko, Resident
September 21, 2000

19A. Comment is noted by the Town of Mammoth Lakes. The Town has not considered ROW abandonment for this section of Lake Mary Road.

19B. Comment is noted by the Town of Mammoth Lakes.

19C. The concept of a roundabout for the intersection of Minaret Road and Lake Mary Road was not considered for several reasons. First, with the recommended mitigation measure of an additional southbound left turn lane, an adequate level of service can not be achieved. Second, additional public right-of-way on the corners of the intersection would be required, which would impact those businesses. Third, Caltrans, which has jurisdiction of the intersection, has not been enthusiastic regarding the application of roundabouts.

The traffic model developed by the Town's consultant specify that no additional parking beyond what exists today will be provided at the Main Lodge area.

New traffic signals are contemplated with the Town's adopted Development Impact Fee Program. Examples include the intersections of Main Street/Center Street and Forest Trail/Main Street. Each of these intersections would be subject to a detailed warrant analysis and evaluation in cooperation with Caltrans prior to implementation.

19D. There is a pedestrian trail exhibit in the Specific Plan which proposes to link all developments within the Specific Plan. Unfortunately, the Town Trail does not go through North Village. The Parks and Recreation Commission is currently undergoing a review of the Town Trail system and a link may become possible shortly.

19E. Refer to Response to Comment 19D.

19F. Shared driveways are encouraged by the Specific Plan. As project plans are prepared, the comment can be addressed. The property boundary should follow the boundary as shown on Exhibit A of the Specific Plan Amendment.

19G. Building heights are always set by feet not levels for the very reason cited. It is the designers option as to how may levels to provide.

SEP 21 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

FROM: Jack Winkler

Date: 9/21/00

FAX COVER SHEET

J. E. WINKLER

COMMENT NO. 20

P.O. Box 939
Mammoth Lakes, CA 93546
FAX: (760) 934-2348
WK Phone: (760) 934-7585
HOME (760) 934-2348

TO: ① PLANNING COMM / KAREN ② ~~PLANNING DEPT~~ / JOHNSTON To FAX #: (760) 934-8608

SUBJECT: COMMENTS ON NO. VILLAGE SPECIFIC PLAN (DATED 7/2000)

Number of Pages including FAX COVER SHEET: 5

① Maximum allowed Building Heights (Ref: page 31) are much too high for the character/ambiance of Mam. Lakes area plus the high density may overload the infrastructure (reduced in scope by redevelopment declared illegal): excess traffic flow, drainage problems, gen'l congestion, etc

② (Ref EXH (D) -- "M"). The skier bridge may create icing problems for the road under it by drippage & shading of the road. Adequate under-bridge clearance is needed for fire & other tall emergency vehicles. A snow melt system should be installed in the road under bridge

③ (Ref: EXH "D" -- R Parcel 27). The 6 refurbished community tennis courts should not be demolished in favor of a public parking structure. Putting the 6-8 tennis courts on top of a parking structure would create bad conditions for playing tennis (vibration, more wind, ball retrieval problems if ball hit over fence, inconvenience, health, etc.)

④ (Ref: EXH (D)) All the traffic (auto, bus) to & from Canyon Lodge should flow over 2 routes (not a third or a 4th route through residential, quiet neighborhoods):

(A) W. on Main St/Lake Mary Rd, N & W on Miller Siding (re-alligned) and W. on Canyon Blvd to Canyon Lodge (reverse this flow from Canyon Lodge).

(B) (Secondary Route) N. on Minaret Rd to traffic ⊙, W on Forest Trail S. on Hillside Dr, & W. on Canyon Bl to Canyon Lodge (Reverse from Canyon Lodge)

Signing, striping, and other traffic flow directors should be installed from the begining to make sure that no thru traffic to Canyon Lodge (or from it) deviates to flow over quiet residential streets such as Forest Trail W. of Hillside Dr and Hillside Dr N. of Forest Trail; these 2 quiet residential streets have low traffic flow of just residents at maybe 25 cars per hour in both directions (over 24 hours); neither is a collector street as there is only one cross street "crest" which int[illegible] Forest Trail. Collector streets allow flows of app[illegible] 0 vehicles/hr (in both direction

20A

DISCUSSION OF POINTS (1) → (4)

(1) (Ref: pg 31 -- TABLE 4) Maximum allowed Building Heights are Excessive for Character/ambience of the Town and the Resulting Density would overload the Area's Infrastructure (excessive traffic flow & congestion, drainage problems, general congestion of people & cars, snowplowing, etc) -- infrastructure budget reduced by courts finding Town's redevelopment illegal: (Worst Height Examples)

Land Use Area	Bldg Levels (occupied)	Overall Maximum Permitted Height above Grade (20' Pkg + Maximum Projected Ht.)
Mixed Use Areas	1→5	100'
Resort Lodging Area	1→7	110'

100' → 110' high buildings in Mam Lakes would not fit in with the character and ambience of the rest of the Town (Juniper Springs Lodge was allowed a maximum height of 63' (parking + living) which should be the overall maximum height permitted in North Village. This height maximum of 63' will also decrease the density of the Village and allow the Town's affordable infrastructure to handle this increased Village load on traffic/pedestrian flow & congestion, drainage, snowplowing, noise, etc.

(2) (Ref EXH (D) -- "M") Skier bridge may create bo road icing problems and road clearance problems for tall emergency vehicles (fire, ambulances, cra

The skier bridge may create icing problems for the road under it due to drippage from the bridge & shading of the road. A snow melt system should be installed under this bridge to prevent these (road) icing problems. Adequate clearance is needed under the bridge to allow for the passage of tall emergency vehicles/equipment such as fire vehicles, cranes, construction equipt, etc.

(3) (Ref EXH (D) - R) The 6 refurbished community Tennis Courts should not be demolished in favor of a public parking structure. Putting 6-8 Community Tennis Courts on top of a several story high parking structure would create bad, unsatisfactory conditions for tennis players and tennis tournaments!:

(A) Vibration of Structure by both Tennis Players & cars would not work well for playing tennis.

(B) Tennis Courts would be up higher and not well-sheltered by trees, etc from wind.

(C) Ball retrieval problems when balls are hit over fence & drop several stories below.

(D) Ease of access & viewing of Tennis Courts on a structure roof would probably be poor for playing & for tournaments.

(E) Tennis players on top of a parking structure would unhealthily inhale poisonous fumes from car & bus exhaust.

(F) Does the Town have the budget to demolish 6 excellent, refurbished tennis courts and then replace them with 6-8 much more expensive Tennis Courts elsewhere (or unacceptably on top of a parking structure). This replacement of Tennis courts would have to be done before the existing Tennis Courts are demolished so Tennis play, lessons, & tournaments would not be interrupted during the Town's 5 month tennis season/weather.

(4) (Ref: Exh D) All Traffic Flows (cars/buses) to & from Canyon Lodge should take place over one primary route and one secondary route which are well signed & striped and no such traffic flow should go through quiet residential neighborhoods

(A) Primary Traffic Route – W. on Main St/Lake Mary Road, N & W on Miller Siding (re-aligned) and W. on Canyon Blvd to Canyon Lodge (Reverse of this flow from Canyon Lodge

(B) Secondary Traffic Route – N. on Minaret Rd to the larg Traffic Circle at Forest Trail, W on Forest Trail, S. on Hillside Dr., & W. on Canyon Bl to Canyon Lodge (Reverse of this flow from Canyon Lodge).

Complete signing, striping and other traffic flow directors (& mitigators) should be installed from the beginning to make sure that no thru traffic to (or from) Cadyon Lodge deviates to flow on quiet residential streets such as Forest Trail W. of Hillside Dr, and Hillside Dr. N. of Forest Trail; these 2 quiet residential streets have low traffic flow primarily of residents at approx 25 cars/hour in both directions (over 24 hours). Neither of these streets is a collector street west of the intersection of Forest Trail & Hillside Dr. as there is only one cross street "Crest Lane" which intersects Forest Trail. "collector streets" allow traffic flows of approx 480 vehicles/hour in both directions (over a 24 hour period); this is approx 20X the traffic flow that now exists on Forest Trail (W. of Hillside Dr) and on Hillside Dr. (N. of Forest Trail).

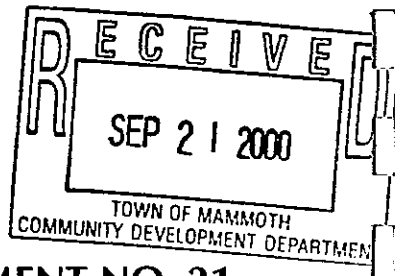
The North Village Specific Plan should incorporate essential mitigation measures such as complete signage & striping to make sure the heavy peak traffic flow (cars/buses) stays on the one primary route & one secondary route to/from Canyon Lodge and doesn't deviate to flow over quiet residential streets (with kids & pets).

Response to Comment No. 20

J.E. Winkler, Resident
September 21, 2000

20A. The commentor has provided comments and recommendations which pertain to the Specific Plan Amendment and Project Description. Comments relate to building heights, safety pertaining to the skier bridge, development at the community tennis court facility and traffic routing/movement. Building height, overall project development and traffic have been comprehensively analyzed in the Draft EIR. The skier bridge shall be required to conform to Town development standards. The feature may require further review by the Town of Mammoth Lakes once design/development plans are submitted to the Town for review and approval.

Steve Miesel
P.O. Box 7383
Mammoth Lakes, CA 93546



COMMENT NO. 21

Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

Dear Town of Mammoth Lakes,

The following are comments relating the Draft Environmental Impact Report for the 1999 North Village Specific Plan hereafter refered to as the DEIR:

1. This comment concerns the statement on page 5.2-19 of the DEIS, "It was determined by the Town that housing should be provided for 58.5 percent of the FTEE's generated by new development. Providing housing for only 58.5 percent of the FTEE's generated by North Village has potentially significant impacts on housing. On page 5.2-19 the DEIS refers to the adoption of the Affordable Housing Mitigation Regulations (AHMR). The Planning Commission and the Town Council adopted the AHMR with the 58.5 percent provision rate that was based in part on statistics and assumptions that do not apply to the population of employees at North Village. Due to the resort nature of the development and the relatively high number of lower paying jobs generated by the development, the income for the population of employees at North Village will be significantly less than the income of the population used to determine the 58.5 percent provision rate. Significantly more than 58.5 percent of North Village employees will require affordable housing. Both the 1991 EIR for the North Village Specific Plan and the standards incorporated in the housing element portion of the 1994 North Village Specific Plan point to providing a significantly higher provision rate. **21A**
2. Comments 2 (a) and 2(b) pertain to the following two sentences found on page 5.2-21 of the DEIR: "The Specific Plan Amendment proposes to locate at least half of the units in Resort of Specific Plan zoned properties and no more than half in zones other than RMF-1. This produces a similar result as the Town's policy as there is no impact on the supply of RMF-1 zoned land, which currently is the only rental apartment zoned land". **21B**

2 (a) Allowing the employee housing units (EHU) and family dwelling units (FDU) to be located in Shady Rest (zoned AH and HDR and allowing apartments) would have a potentially significant impact on housing. The AHMR speaks to this. Shady Rest should not be the location the employee housing units (EHU) nor the family dwelling units (FDU) shown on page 5.2-21 of the EIR. **21C**

2 (b) Locating the employee housing units (EHU) and family dwelling units (FDU) to in existing rental units (apartments) has a potentially significant impact on housing. Also the AHMR has language concerning existing rental units. **21D**

Truly,

Steve Miesel

Response to Comment No. 21

Steve Miesel, Resident
Received September 21, 2000

21A. There is no evidence that the demographics of the projected North Village employees are substantially different from the community as a whole.

21B. The Town of Mammoth Lakes concurs that there is no impact on RMF-1.

21C. The Town of Mammoth Lakes concurs that Shady Rest should not be used for development of housing mitigation. The Specific Plan Amendment should be modified to include Shady Rest.

21D. Condominium conversions require mitigation. Those will be dealt with separately.

COMMENT NO. 22

Eakins Appliance Parts

P.O. Box 1487, Mammoth Lakes, CA 93546 (760) 934-2937, (760) 934-9724 Fax

September 21, 2000

The Town of Mammoth Lakes Planning Commission
Attn: Tina, Town Secretary
P.O. Box 1609
Mammoth Lakes, CA 93546-1609
Fax (760) 934-8608

Dear Tina,

As a long time local property and business owner, I want to express my approval of Intrawest's planned Village at Mammoth and urge the planning commission to quickly do the same. My home address is 166 Canyon Blvd., the second house on Canyon, right next to the proposed Village. I feel that it is important to state my opinion to the planning commission since the proposed development is in my neighborhood.

This development plan is just what Mammoth needs to bring it up-to-date with the 21st century and the continuing demands of our resort visitors, who are looking for different and more memorable experiences from our mountain community. We cannot pass up or even delay this great opportunity to get immediately started with Mammoth's future. We need to quickly advance forward with the proposed plan and begin to break ground while the momentum is there. 22A

I was present at Tuesday night's local forum held by Intrawest. I am very excited about the proposed lodging complex and especially the surrounding pedestrian plazas and gondola lift. I have been in support of Intrawest since first hearing their incredible vision for our town. These proposed additions to our town are long over due. But I, along with my neighbors, have been patiently waiting all year for the Town of Mammoth Lakes to approve Intrawest's plans and finally break ground on the much needed and desired Village at Mammoth.

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH LAKES
PLANNING DIVISION

Now is the time to proceed, because we, as a town, are on the verge of being left far behind other ski resorts. What a shame when Mammoth is capable of being so much more. When will our dreams of a year-round, world-class resort be fully realized? A town able to sustain all season visitors with the full amenities that tourists are looking for. The potential is there. It is so great and close at hand. And Intrawest is the best company to help us not only realize that potential, but to help guide us through it into the 21st century, where we so desperately need to be. Mammoth could be ranked along side such great resorts as Vail and Aspen, if only the great vision for it's future could began.

I urge the Planning Commission to visit Lake Tahoe to see the improvements to those ski resorts and surrounding areas. The Town of Mammoth Lakes needs to be able to offer more to its visitors than what it does today. People want to spend their hard earned money on the best possible vacation they can experience. These tourists will continue to spend their money on modern amenities at other resorts, until we can offer more. It has been long enough that Mammoth has lost so much tourism to our biggest competitors to the North. 22A

With the great success of Juniper Springs Lodge, the Sierra Star Golf Course, Sunstone, and of course the millions of dollars spend on the ski area for improvements, what is the town waiting for? How much longer must all this be dragged out until Intrawest can be approved and proceed with the Village? The longer the town stalls, the more tourism and local business is lost and the harder it remains for all local business owners to survive and flourish.

If we, as a town, cannot come together to approve and proceed with Intrawest's proposed Village at Mammoth, then a truly marvelous opportunity will be sadly passed up and missed. Then I, as well as a lot of other local business and property owners, will be blaming the town for our continued stagnant economy.

Sincerely,

Kenneth L. Elliott
(A.K.A. Casey Elliott)

Response to Comment No. 22
Kenneth Elliott, Resident
September 21, 2000

22A. Comment is noted by the Town of Mammoth Lakes.

TOWN OF MAMMOTH
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SEP 21 2000

Return-Path: <Shpunger@aol.com>
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(InterMail vM.4.01.03.00 201-229-121) with ESMTP
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for <Townofml@gte.net>; Thu, 21 Sep 2000 16:13:34 -0500
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Thu, 21 Sep 2000 17:13:33 -0400 (EDT)
From: Shpunger@aol.com
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Date: Thu, 21 Sep 2000 17:13:32 EDT
Subject: Att: Karen Johnston Re: North Village proposal
To: Townofml@gte.net
CC: Dsevery@intrawest.com
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Content-Transfer-Encoding: 7bit
X-Mailer: AOL 4.0 for Windows 95 sub 106

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

COMMENT NO. 23

Dear Ms. Johnston,

I would like to comment on the North Village plan proposed by Intrawest. Although I have several reservations about the look and scope of the village itself, I think most of my thoughts have been addressed by others. I would like to focus on the current plan for a parking garage under the Community Center Tennis Courts.

As President of the Mammoth Lakes Tennis Club, I have had the opportunity to discuss this proposed garage with a great many of our tennis playing locals and visitors, including one second homeowner who owns several private tennis clubs in Southern California. Every single player I've spoken with has been opposed to tennis courts on top of a parking garage.

The reasons given are as follows:

1) Vibration. Even solid concrete at ground level will vibrate with automobile traffic. Players running also cause vibration. Anyone who has ever played on this type of surface will tell you this is not an appropriate venue for tennis courts.

2) Ball retrieval. If the courts are above ground, even one or two stories, the retrieval of balls that have bounced over the fence becomes problematic. This is not at all an unusual occurrence and the interruption of a match to run down stairs for a ball will make for a frustrating game. **23A**

3) Viewing. There are currently three tennis tournaments held at the Community Tennis Courts each summer with spectator viewing along the sides and ends. Will there be areas for viewing on top of the garage?

4) Wind. The trees around the Community Courts provide a certain amount of shelter from the wind (wind being a huge negative factor in the game). Will the trees be saved or will most of them need to be removed for the construction of the garage? Or will the new courts be above the trees?

5) Health. The traffic using this garage can't help but impact the air quality on the tennis courts. This is an aerobic sport and breathing auto exhaust could adversely affect the quality of play and the health of the tennis players.

6) Cost. The current six Community Tennis Courts were just resurfaced and restored at a cost to the Town of approximately $23,000.00. New tennis

courts cost upwards of $40,000.00 per court. Does the Town have that much expendable money that it can afford to tear up a recreation center that is already in place when other areas (some closer to the Village) are available (I, personally am against the Town paying for the parking garage at all, but I won't speak for Mammoth Lakes Tennis Club members on that issue).

If this proposed parking structure at the Community Center is a "done deal", The members of the Mammoth Lakes Tennis Club ask that the Town and/or Intrawest construct a new tennis facility prior the demolition of the existing courts. If public courts are unavailable for even one season, the Mammoth Lakes Tennis Club is out of business, the Mammoth Open, Summer Solstice and Labor Day Tournaments cannot be held (these 3 events bring several hundred visitors to our town each summer), and the very popular Parks and Recreation tennis programs will come to an end. 23A

I have one further comment that Intrawest needs to address. With the proposed 2000 or so new housing/rental units going in at North Village, where are these people going to recreate? Does Intrawest think that six community courts can handle these additional tennis playing visitors and homeowners. The community courts are currently overflowing with people waiting to play on most weekend mornings. We need more public tennis courts (8 is the standard number required for tournaments) and this is something that Intrawest needs to put in their plans.

Thank you for your consideration, and if you have any questions regarding any of these points, please call me.

Yours truly,

Gail Lonne, President
Mammoth Lakes Tennis Club
(760) 934-0150

P.S. I currently have approximately 300 signatures on a petition opposing this parking garage under the Community Courts.

Response to Comment No. 23

Gail Lonne, Mammoth Lakes Tennis Club
September 21, 2000

23A. Comment is noted by the Town of Mammoth Lakes.

RECEIVED
SEP 21 2000
TOWN OF MAMMOTH
COMMUNITY DEVELOPMENT DEPARTMENT

COMMENT NO. 24

" YES FOR NORTH VILLAGE - AS IS PROPOSED BY INVESTORS FOR THE BENEFIT OF OUR COMMUNITY.

24A

Response to Comment No. 24
Commentor Unknown
Received September 21, 2000

24A. Comment is noted by the Town of Mammoth Lakes.

DEPARTMENT OF TRANSPORTATION
DISTRICT 9
500 SOUTH MAIN STREET
BISHOP, CA 93514-3423
Phone (760) 872-1492
Fax (760) 872-0678

COMMENT 25

October 3, 2000

Ms. Karen Johnston, Senior Planner
Town of Mammoth Lakes
437 Old Mammoth Road
Mammoth Lakes, California 93546

File: 09-Mono-203
North Village Specific Plan Amendment
SCH#: 99-092082

REF: SUBSEQUENT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE NORTH VILLAGE 1999 SPECIFIC PLAN AMENDMENT PROJECT (AUGUST 4, 2000).

Dear Ms. Johnston:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Town of Mammoth Lakes Subsequent Program EIR for the North Village Specific Plan Amendment Project. We understand that this is a Programmatic Environmental Document, and that there will be other opportunities to provide additional and more specific comments at the project level as this Plan is implemented.

Please replace the comments we sent in dated September 21, 2000 with these refined comments:

I. TRAFFIC IN GENERAL

- A Traffic Impact Analysis needs to be done to fully analyze the projected short-term and long-term traffic-related impacts including pedestrian, bicyclist, public transportation, and/or goods movement needs on State Route (SR) 203. Many of the recommended transportation alternatives in the document were not substantiated or based on sufficient analysis or accepted methodology (i.e., Institute of Transportation Engineers, Transportation Research Board, Highway Capacity Manual, etc.). The Draft Traffic Impact Study Guidelines will be available for review, shortly. We will forward a copy to you upon its arrival. **25A**

- Caltrans would prefer to see other options explored in lieu of an uncontrolled pedestrian crossing or with the employment of a Traffic Control Officer at the proposed mid-block pedestrian crossing on Minaret Road (SR203). During Phase 1, a mid-block crosswalk is not warranted. Extensions of existing intersections are better suited for crosswalks. Mid-block crosswalks may cause **25B**

major disruptions in, and could cause a breakdown of, the flow of traffic on the State Highway. Unless maintained by the Town under agreement, crosswalks are not to be constructed using different material (non-asphalt), as this is a maintenance concern; and, the width of the proposed mid-block crosswalk does not meet Caltrans standards. **25B**

- Any work proposed and constructed within the State Right-of-Way (R/W), since this EIR could cover more than one project, is subject to federal and state standards, including any updates, changes or design bulletins that are in effect at the time of Caltrans permitting. All proposed work in State R/W needs to be done in close coordination and consultation with Caltrans and is subject to further review and approval to ensure design conformity. **25C**

- A portion of SR203 is under easement from the U.S. Forest Service (USFS) to Caltrans. Any approvals by Caltrans will, by necessity, also require approval from USFS. **25D**

- There are proposed signals and turn-lanes at various locations on SR203. Sufficient data is not presented in the Document to evaluate the need for the devices/features at these locations. Caltrans' methodologies (Traffic Manual, Chapter 9) need to be used to determine if, and when, these proposed measures meet warrants. All traffic signals, crosswalks, turn-lanes, channelization, etc. must meet with Caltrans established standards/criteria. Some signals, due to their close proximity, may need to be phased and timed to work together. **25E**

- The Document should address how Developer and/or Mitigation Fees will be collected to pay for all traffic mitigation measures associated with this project in the State R/W. This includes any proposed signaling devices, Roundabout, new parking facilities, pedestrian and bicycle facilities, structures, and other transportation related mitigation. Monitoring of system improvements, and providing for any potential revisions, if there are failures, needs to be addressed. Evidence of third party agreements to mitigate and provide for build out improvements, and monitoring of the system, needs to be discussed. **25F**

- Proposed parking on Minaret Road (SR203) between Forest Trail Road and existing Miller's Siding (Pg. 3-30) is a major concern due to snow removal operations. Parking needs to be restricted from Main Street to Forest Trail during the months from November to April. **25G**

- What development is being proposed during Phase 1 verses that in future phases? **25H**

- For State Route 203, from Main Street to Forest Trail, the Right-of-Way (R/W) shall be 70 feet with the exception of the R/W near the intersections of SR203 and Forest Trail and SR203 and Lake Mary Road. These intersections need to be of adequate width to accommodate the final design at each location. 25I

- Sidewalks need to be included within the 70-foot R/W along both sides of SR203 and be at least five feet in width (this is based on a 60-foot curb to curb cross-section). Caltrans will work with the Town and the developer to specify design and maintenance restrictions and other considerations which will control what will be allowed within the five-foot sidewalk area (including such things, as pavement materials, roadway/safety signage, and non-standard features). Landscaping and street art furniture needs to be situated outside of the designated five-foot sidewalk area. 25J

- Lake Mary Road and/or Minaret Road may need to be widened near their junction with SR203 to facilitate the proper operation of the signal and intersection movements. 25K

- All approach and corner sight distances on SR203 will need to meet safety standards contained within the Highway Design Manual (HDM), Topic 405. All street light standards, if proposed in or adjacent to State R/W, need to meet Caltrans standards/guidelines; and, if installed within clear zones, must be breakaway. 25L

- Building setbacks from the new R/W line on SR203 from Main Street to Forest Trail needs to be at least 10 feet on each side. 25M

- It is confusing that under the "Mitigation Measures," a mitigation measure is listed along with a statement indicating no mitigation is recommended. For example, Mitigation Measure 5.4-1b lists construction of a Roundabout as a mitigation measure to reduce the impact of additional typical Saturday traffic. However, the Mitigation Measure also states that, "hence no mitigation is recommended since an acceptable LOS (LOS D or better) is achieved with the roundabout." 25N

II. ROUNDABOUT

The document proposes a Roundabout at the intersection of SR203 and Forest Trail Road. The construction of the proposed Roundabout on the State R/W is currently under consideration. Caltrans and the Town of Mammoth Lakes have met several times to discuss the proposed Roundabout and other design features associated with SR203. The specific requirements and features of this Plan will be addressed in a separate Cooperative Agreement. 25O

In addition, a building permit will not be issued until encroachment permit applications can be reviewed and agreements are reached. Neither conceptual nor geometric approval for the construction of a Roundabout has been given by Caltrans at this time. Caltrans will continue to work with the Town to address mutual concerns. Some of the conditions and constraints include:

- If the last phase of the Village construction does not begin within five years of the building of the Roundabout, or if minimum signal warrants are not met within three years of the construction of the Roundabout, Caltrans reserves the right to require the Roundabout to be removed. The intersection at SR203 and Forest Trail will be returned to its current configuration (two way stop) or any other such configuration as is deemed appropriate by Caltrans in consultation with the Town at that time at the Town's expense.

- The Developer may need to acquire additional easements and/or R/W to accommodate the Roundabout, walkways, and bikeways. The Developer will provide Caltrans for review a street section design for the full length of Minaret Road (SR203) from Main Street to Mammoth Knolls Drive, including striping, center turn lanes, bicycle and pedestrian facilities, parking areas, temporary snow storage areas, street vacations and R/W dedications, signal improvements, chain up area redesign, etc. and phasing of improvements, i.e., the intersection of Berner Street, future turn lanes and Main Street, future raised medians, etc. 250

- The Roundabout design needs to be a two-lane facility but stripped and operated as a single lane facility until such a time that the operational status necessitates its expansion to two lanes based on and compared with pre-established performance measures.

- As a mitigation measure in Phase 1, in order to maximize the effectiveness of the proposed Roundabout, a parking facility needs to be implemented on the northeast corner of SR203 and Forest Trail. Access is to be from Forest Trail. This will help to balance out the generated traffic on the east leg of Forest Trail and SR203. Measures need to be implemented to ensure all four approaches to the Roundabout are somewhat balanced with generated traffic, otherwise the device is subject to failure.

- Safety features involving the Roundabout, roadway connection designs and geometrics need to meet Federal and State guidelines, and is subject to Caltrans review and approval process.

- Drainage needs to be designed to prevent freeze/thaw icing conditions experienced by Roundabouts in other snowy locations.

- The central island, along with any proposed landscaping and/or objects within the Roundabout, needs to follow highway planting standards contained within the HDM, Topic 902, as to not interfere with sight distance.

- Decreasing road grade through the Roundabout will require that other road grade surface angles be increased. The approach grades may need to be redesigned and reconstructed to meet design standards.

- An effective monitoring program is to be developed in coordination with Caltrans to ensure that an acceptable LOS is maintained on SR203. The Town and Caltrans are to agree on a set of parameters with which to measure the performance of SR203 and the Roundabout. If the Roundabout is found to fail to meet these operating parameters, the Town will work with Caltrans to adopt mitigation measures throughout the Town to control traffic impacts to fall within established thresholds. Caltrans is willing to consider other roadway design options, including but not limited to, 4 lanes, signals, rerouting the State Highway or turning over this segment of SR203 to the Town as mitigation measures. Caltrans will make any final decision concerning the continued existence and/or removal of the proposed Roundabout and associated features based upon data collected and pre-established performance measures. 25O

- Raised islands and curbs will not be permitted as part of the Roundabout if the Town of Mammoth Lakes is unwilling or unable to perform the annual curb maintenance and repairs under agreement.

- A separate pedestrian and bicycle facility that utilizes an alternative route(s) around the Roundabout needs to be addressed.

- Additional constraints and conditions may be identified and negotiated for the proposed Roundabout and associated features as part of any conceptual approval and final review process.

III. MAINTENANCE ISSUES

- Close coordination and consultation with Caltrans, Lahontan, Public Utilities District, and the Developer is advised in creating an acceptable water quality control plan for the project. Review and evaluation should continue throughout the planning, construction, and final stages to ensure that all surface drainage will be collected and treated from adjacent developments and roadways prior to release. Drainage systems on the highway need to be in accordance with Caltrans Highway Design Manual, Section 800. 25P

- Close coordination and consultation with Caltrans and the Developer is advised in developing a general landscape and/or sidewalk maintenance plan to ensure that no herbicides, pesticides, or chemicals will runoff or drain from the adjacent development onto State right-of-way facilities. Examples include sidewalk de-icing and fertilizing and/or spraying of decorative planting areas. **25Q**

- The Document proposes that "Snow removal on State or Town roads would continue to be the responsibility of the respective agency or the maintenance district" (Pages 3-38 and 5.10-17). A comprehensive maintenance plan and agreement need to be developed to ensure that State R/W and facilities are maintained to Caltrans standards. The Town of Mammoth Lakes will need to assume the increased level in snow and ice removal and snow storage work at their own expense or reimburse Caltrans for the additional work. **25R**

- All proposed landscaping and/or irrigation system/s within the SR203 R/W will need to be maintained by the Town. **25S**

This review process does not change any conditions included in the MOU covering Right-of-Way transfers, Cooperative Agreements, and/or Maintenance Agreements currently in effect or any future agreements. Finally, please be advised that an Encroachment Permit(s) needs to be obtained from Caltrans prior to any work done on the State R/W or facility. **25T**

Please forward a copy of any final document(s) to us. If you have any questions, please contact me at (760) 872-1492. We look forward in continuing to work with you in a cooperative manner.

Sincerely,

CAROLYN YEE
IGR/CEQA Coordinator

c: State Clearinghouse: Scott Morgan

Response to Comment No. 25

Carolyn Yee, Department of Transportation, District 9
October 3, 2000 (replaces previous submittal dated September 21, 2000)

25A. A traffic impact analysis was completed and incorporated into the EIR that fully addressed the project's short and long-range traffic impacts in accordance with the Town of Mammoth Lakes analysis methodology. Other issues, such as pedestrians and public transportation, are addressed in technical documents referenced on page 5.4-45 of the EIR.

25B. Other options for pedestrian crossings of Minaret were evaluated during the design and planning process and found to not be viable.

A mid-block crosswalk during Phase 1 is not proposed.

Traffic simulations were presented to Caltrans in January, 1999, which demonstrated that either protected or unprotected pedestrian crossings would not result in a breakdown of traffic flow. Correspondence associated with the pedestrian crossings and January 1999 discussions with Caltrans have been incorporated in the Final EIR on the pages which follow.

If crosswalks are constructed of different material, a maintenance agreement would be required.

It is acknowledged that Caltrans would need to approve any proposed mid-block crosswalk design.

25C. Comment is noted by the Town of Mammoth Lakes.

25D. Comment is noted by the Town of Mammoth Lakes.

25E. Comment is noted by the Town of Mammoth Lakes.

25F. All improvements proposed for North Village in the State's R/W are considered locally funded (i.e., no State funds). Some improvements, such as future traffic signals on SR 203 at Center Street, which is outside North Village, are included in the Town's adopted Development Impact Fees. Each improvement proposed in the State's R/W requires an encroachment permit process, where monitoring can be addressed.

25G. It is acknowledged that any plan for short-term parking on Minaret between Forest Trail and Canyon Boulevard needs to be coordinated with a snow removal program.

25H. Phase 1 development is west of Minaret, and Phase 2 is east of Minaret.

25I. Comment is noted by the Town of Mammoth Lakes.

25J. Comment is noted by the Town of Mammoth Lakes.

25K. Comment is noted by the Town of Mammoth Lakes.

25L. Comment is noted with the exception that corner sight distance, as called out in Topic 405.1 (2) Corner Sight Distance, is not an applicable criterion because all traffic entering the roundabout is designed to slow to approximately 15 mph whether or not conflicting perpendicular traffic is approaching.

25M. Comment is noted by the Town of Mammoth Lakes.

25N. The comment is referring to Mitigation Measure 5.4-1a, not b. The reason for using the terminology "hence no mitigation is recommended . . ." is that the roundabout, which provides for an adequate Level of Service, is part of the proposed project design and not a technical mitigation measure.

25O. This comment addresses design and maintenance issues related to the proposed roundabout. Each of these issues will require continued negotiations between Caltrans and the Town and would be formally addressed in a separate Cooperative Agreement.

25P. Comment is noted by the Town of Mammoth Lakes.

25Q. Comment is noted by the Town of Mammoth Lakes.

25R. Comment is noted by the Town of Mammoth Lakes.

25S. Comment is noted by the Town of Mammoth Lakes.

25T. Comment is noted by the Town of Mammoth Lakes.

2. It was suggested that a test of a traffic control officer simulation be evaluated. To simulate this, the primary pedestrian crossing was coded as an intersection with pedestrian traffic only crossing Minaret.

   The simulation optimized at a 90 second cycle with 20 seconds provided for the pedestrian phase. This would allow 7 seconds of "walk," 11 seconds (44 feet divided by 4 feet per second) of "don't walk" clearance, and 2 seconds of final clearance. This simulation did not yield southbound queues (the peak direction) backing up into the next pedestrian crossing to the north (approximately 350 feet to the north).

   This simulation was tested with vehicular speeds of 25, 30, and 35 mph and, in all cases, the queues did not back up into the next pedestrian crossing.

   In conclusion, we support the concept of using a traffic control officer at the pedestrian crossings during peak traffic and pedestrian periods. The simulation has effectively demonstrated that, even with conservative delays to vehicular traffic (i.e., 20 seconds), the delays and queues will not impede or unnecessarily congest traffic on Minaret Road.

3. It was requested that a specific analysis be developed to project pedestrian activity in the Gondola Village. The simulation analyses that have been conducted previously assumed 600 pedestrians crossing Minaret Road during the peak hour, 400 at the primary crossing near the gondola and 200 at the secondary crossing, between the primary location and the roundabout.

Using land use and person trip generation data supplied in the *Mammoth Master Transportation Plan Modeling Support* (Master Plan Traffic Impact Analysis report) by RKJK, August 24, 1998, projected pedestrian activity has been developed. This analysis considers information related to the gondola, lodges, retail, and parking structure pedestrian productions and attractions. The projected pedestrian activity is presented in Table A, and is composed of two elements: the residential/lodging generation and the retail generation. Each element is discussed individually.

The top frame of Table A presents the estimated pedestrian activity for the residential/lodging component of Gondola Village. This component accounts primarily for skiers leaving the gondola returning to the lodges.

The residential/lodging units of Gondola Village are planned in three distinct areas: west of Millers Siding, west of Minaret Road, and east of Minaret Road. The first horizontal row presents the allocation of units within the three areas. The area east of Minaret Road is shaded, as pedestrians from the gondola to these units would cross Minaret Road and contribute to the pedestrian activity in the crossings.

Daily person trip generation is calculated by multiplying the number of units with the daily person trip rate used in the Master Plan report. A total of approximately 14,518 daily person trips have been forecast to be generated by the total 854 lodging units of Gondola Village. In particular, the 230 units east of Minaret Road have been forecast to generate 3,910 daily person trips.

According to the Master Plan report, the lodging component of Gondola Village is estimated to generate 4,895 daily vehicle trips. On average, each vehicle trip will carry 2.2 persons. Therefore, of the 14,518 total daily person trips generated by the Gondola Village lodges, approximately 10,769 persons will travel by car daily (4,895 x 2.2). These "vehicle-person" trips have been allocated proportionally to each of the three lodging areas, with the area east of Minaret Road generating 2,900 daily "vehicle-person" trips.

Subtracting the daily "vehicle-person" trips from the total daily person trips leaves daily person trips by walk/transit. For purposes of this analysis, all walk/transit trips are considered pedestrians. The area east of Minaret Road has been forecast to generate 1,010 daily pedestrian trips, of which 11 percent have been calculated to occur in the afternoon peak hour. Therefore, using the data provided in the Master Plan report, approximately 111 pedestrians during the afternoon peak hour are estimated to walk to/from the lodgings east of Minaret Road. During the afternoon peak hour, the majority of these pedestrians trips are anticipated to be related to trips from the gondola to the lodges east of Minaret Road. A minor portion of the total peak hour pedestrian trips may be associated with movements between the lodgings and the retail amenities. These pedestrians will be accounted for in the discussion of the retail component of Gondola Village.

Table A - Gondola Village Pedestrian Generation

Residential Component	West of Millers Siding	West of Minaret Road	East of Minaret Road	Total
1. Residential Units	335	289	230	854
2. Daily Person Trip Rate	17	17	17	17
3. Daily Person Trip Generation	5,695	4,913	3,910	14,518
4. Total Daily Auto Trips[1]				4,895
5. Daily Person Trips by Auto[2]	4,224	3,644	2,900	10,769
6. Daily Person Trips by Walk/Transit (3.-5.)	1,471	1,269	1,010	3,749
7. Peak Hour Person Trips by Walk/Transit[3]	162	140	111	412

Retail Component	West of Minaret Road	East of Minaret Road	Total
1. Retail Square Footage	69,360	46,260	115,620
2. Daily Person Trip Rate	70.71	70.71	70.71
3. Daily Person Trip Generation	4,904	3,271	8,175
4. Peak Hour Person Trip Generation[4]	589	393	981
5. Peak Hour Person Trip-Same Side Destination	394	263	657
6. Peak Hour Person Trip-Other Side Destination	195	130	324

Total Estimated Peak Hour Pedestrian Crossings	436

1 Source: *Mammoth Master Transportation Plan Modeling Support*, RKJK, August 24, 1998, Table 8, p.21.

2 Total Daily Auto Trips of 4,895 multiplied by AVO of 2.2 persons per auto, allocated proprtionally to the three residential areas.

3 Peak hour person trips by walk/transit is daily person trips by walk/transit multiplied by peak hour factor calculated to be 0.11.

4 Peak hour person trip generation is daily person trip generation multiplied by peak hour factor calculated to be 0.12.

1/7/99 (P:\INT732\PEDCALC.xls\Sheet1)

The bottom frame of Table A presents the calculation of the pedestrian activity of the retail component of Gondola Village. In this calculation, the projected pedestrian activity is not only attributable from person trips that walk (i.e., lodgers attracted to the retail), but most notably "vehicle-person" trips that park in the adjacent parking structures and cross Minaret to patronize the retail elements.

Daily person trips are generated for the retail component by multiplying the retail square footage included in the Master Plan report (i.e., 115,620 square feet) with the daily retail person trip rate. The Gondola Village retail component has been estimated to generate a total of 8,175 daily person trips. This trip generation is a combination of both person trips that travel on foot and person trips that travel by car.

The peak hour to daily generation ratio is calculated to be 12 percent for the retail component. Therefore, the retail component has been forecast to generate a total of 981 peak hour person trips, both pedestrians and "vehicle-person" trips.

For purposes of this analysis, the majority of the retail person trips are considered "vehicle-person" trips, as the majority of pedestrian trips to/from the lodging units are associated with movements between the gondola at the end of the ski day. Additionally, due to the winter weather conditions, two-thirds of the retail "vehicle-person" trips are assumed to park in the parking structure on the same side of Minaret Road as their retail destination. One-third of the "vehicle-person" trips will park on one side of Minaret Road and walk across the street to their ultimate destination. Given these conditions, approximately 324 pedestrians will cross Minaret Road to walk to their ultimate retail destination.

The combined influence of the residential and retail elements of Gondola Village is estimated to result in approximately 435 pedestrians crossing Minaret Road at both the crosswalks during the Saturday typical winter p.m. peak hour. As indicated in the LSA simulation, at least 600 pedestrians per hour can cross Minaret Road with insignificant queuing impacts to vehicular travel.

Furthermore, the pedestrian level of service across the two crosswalks will be excellent at a volume of between 435 and 600 pedestrians per hour. According to the 1994 *Highway Capacity Manual*, Chapter 13: Pedestrians, 435 pedestrians per hour crossing two 20 foot wide walkways over 40 feet would be considered level of service A for a standard walkway.

4. It was requested that pedestrian traffic signal warrants be evaluated.

Attached to this letter are the pertinent reference pages from the Caltrans Traffic Manual addressing traffic signal warrants, in general, and the specific

warrants for pedestrian volumes. There are four specific criteria that should be met to warrant a pedestrian signal (see page 9-7 attached):

1) Pedestrian volume during an average day should be either 100 or more for each of any four hours or 190 or more during any one hour.

   This criterion could probably be met for a typical winter Saturday, but is not likely to be met for an average day.

2) There must also be fewer than 60 gaps per hour in the traffic stream of adequate length for pedestrians to cross. Where there is a divided street having a median of sufficient width for the pedestrians to wait, this requirement applies separately to each direction of vehicular traffic.

   It is not likely that this criterion could be met, since a median of 10 feet is proposed leaving a street width of 17 feet to traverse, requiring only 4 to 5 seconds of gap to cross. Only 1 gap of greater than 5 seconds would need to occur per minute to fail this criterion. The average vehicular volume per minute is approximately 15 vehicles; therefore, it is reasonable to assume that at least 1 gap would be greater than 5 seconds, since the average for all gaps is approximately 4 seconds.

3) The nearest traffic signal along the major street is greater than 90 meters. This criterion would be met.

4) The new traffic signal will not seriously disrupt progressive traffic flow on the major road. This criterion would appear to be met based on the simulations prepared to date.

In summary, it is not likely that minimum pedestrian traffic signal warrants could be met.