

Mitigated Negative Declaration

April 2026

474 Joaquin Road Project

474, 562, 2604 Joaquin Road, Mammoth Lakes, CA 93546

Lead Agency:

Town of Mammoth Lakes
Community and Economic Development
437 Old Mammoth Road, Suite R, Mammoth Lakes, CA 93546

Applicant:

Promark Investments
4470 W. Sunset Blvd., Suite 107 PMB 96296, Los Angeles, CA 90027

Prepared by:



9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311

Section 1

Introduction

An application for the proposed 474 Joaquin Road (Project) has been submitted to the Town of Mammoth Lakes (Town) Community and Economic Department for discretionary review. The Town, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study and Mitigated Negative Declaration (IS/MND) is required. Thus, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the Town. Based on the analysis provided in this IS/MND, the Town has concluded that with implementation of the identified mitigation measures, the Project would not result in any significant environmental impacts. The IS/MND is an informational document and is required to be adopted by the decision maker prior to Project approval by the Town.

1.1 Purpose of an Initial Study

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures;¹ and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an Environmental Impact Report (EIR) is normally required.²

1.2 CEQA Process

In compliance with the State CEQA Guidelines, the Town, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. Throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the

¹ The study of alternatives to a project is only required as part of an Environmental Impact Report.

² State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the Town has prepared this Initial Study to determine whether the Project may have a significant effect on the environment. The analysis contained herein determined that with mitigation, the Project would not have a significant effect on the environment. Therefore, an IS/MND was determined to be the appropriate CEQA document.

1.3 Organization of the IS/MND

This IS/MND is organized into five sections as follows:

1 Introduction

Describes the purpose and content of the IS/MND and provides an overview of the CEQA process.

2 Executive Summary

Provides Project information, identifies key areas of environmental concern, and includes a determination as to whether the Project may have a significant effect on the environment.

3 Project Description

Provides a description of the Project and its environmental setting, including specific characteristics of the Project and a list of discretionary actions.

4 Evaluation Of Environmental Impacts

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

5 Preparers And Persons Consulted

Contains a list of the companies that were used to prepare the document and technical appendices.

Section 2

Executive Summary

Project Title: 474 Joaquin Road Project

Project Address: 474, 562, 2604 Joaquin Road, Mammoth Lakes, CA 93546

Lead Agency: Town of Mammoth Lakes
Community and Economic Development
437 Old Mammoth Road, Suite R, Mammoth Lakes, CA 93546

Applicant: Promark Investments
4470 W. Sunset Blvd., Suite 107 PMB 96296, Los Angeles, CA 90027

Prepared by: CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101, Chatsworth, CA 91311

Project Description:

The Project Site contains a 1,500 square-foot single family home on the southern portion of the Site, a small intermittent drainage running through the center of the Site, and a bike path. The Site has approximately 93 trees (consisting of 90 Jeffrey Pines, with two Lodgepole Pines, and one Juniper).

The Project proposes development of a multi-family residential neighborhood that includes 38 residential units in a mix of 2 triplexes and 16 duplexes (total 84,946 square feet), 76 enclosed parking spaces and 18 exterior guest spaces, 5,700 square feet of open space, and 23,460 square feet of snow storage, as well as the realignment of the multi-use path along the north, east, and south sides of the Project Site. Finally, the Project includes two storm drain systems: one to collect runoff from the existing drainage around and along the south and east sides of the Project Site, and a second storm drain system with storage piping for retention to capture runoff from on-site improvements and the off-site surface runoff from the west.

(For additional detail, see **Section 3. Project Description**, of this MND).

Environmental Setting:

The Project Site is located on three parcels on west side of Joaquin Road and north of Meridian Boulevard in the Town of Mammoth Lakes, in Mono County.

(For additional detail, see **Section 3. Project Description**, of this MND).

Other Public Agencies Whose Approval Is Required

(e.g. permits, financing approval, or participation agreement)

None

California Native American Consultation

The Project has complied with the Native American consultation requirements under AB 52. (For additional detail, see **Section 4, Environmental Impact Analysis**, of this MND.)

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would be potentially affected by the Project, as indicated by the checklist on the following pages.

(For additional detail see **Section 4, Environmental Impact Analysis**, of this MND).

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Mandatory Findings of Significance |
| | | <input type="checkbox"/> None Identified |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified “residential or mixed use residential project” that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

PRINTED NAME, TITLE

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

Section 3

Project Description

This section is based on the following item, which is included as **Appendix A** of this MND:

A Plans, Stanley Saitowitz / Natoma Architects, July 29, 2025

3.1 Project Summary

The Project proposes development of a multi-family residential neighborhood that includes 38 residential units in a mix of 2 triplexes and 16 duplexes (total 84,946 square feet), 76 enclosed parking spaces and 18 exterior guest spaces, 5,700 square feet of open space, and 23,460 square feet of snow storage.

3.2 Environmental Setting

3.2.1 Project Location

The Project Site is located on three parcels on west side of Joaquin Road and north of Meridian Boulevard in the Town of Mammoth Lakes (Town), Mono County, California. The Town is located on the eastern slopes of the Sierra Nevada at an elevation of approximately 7,900 feet above sea level, within Section 34, Township 3 South, Range 27 East.¹ The Town is located approximately 168 miles south of Reno, Nevada, and approximately 310 miles north of Los Angeles.

See **Figure 3-1, Aerial Map**.

3.2.2 Surrounding Land Uses²

The Project Site's vicinity is rural/urban with a mixture of housing, commercial, and recreational uses nearby.

North adjacent to the Site are several 2-story residential use buildings as part of the Forest Creek Condominiums community (384 Joaquin Road). This area is zoned Residential Multi-family 2.

South across Meridian Boulevard is the Sierra Star Golf Course. This area is zoned Resort.

West adjacent to the Site are several 2- and 3-story residential use buildings as part of the Obsidian Residence Club community (2610 Meridian Road). This area is zoned Resort.

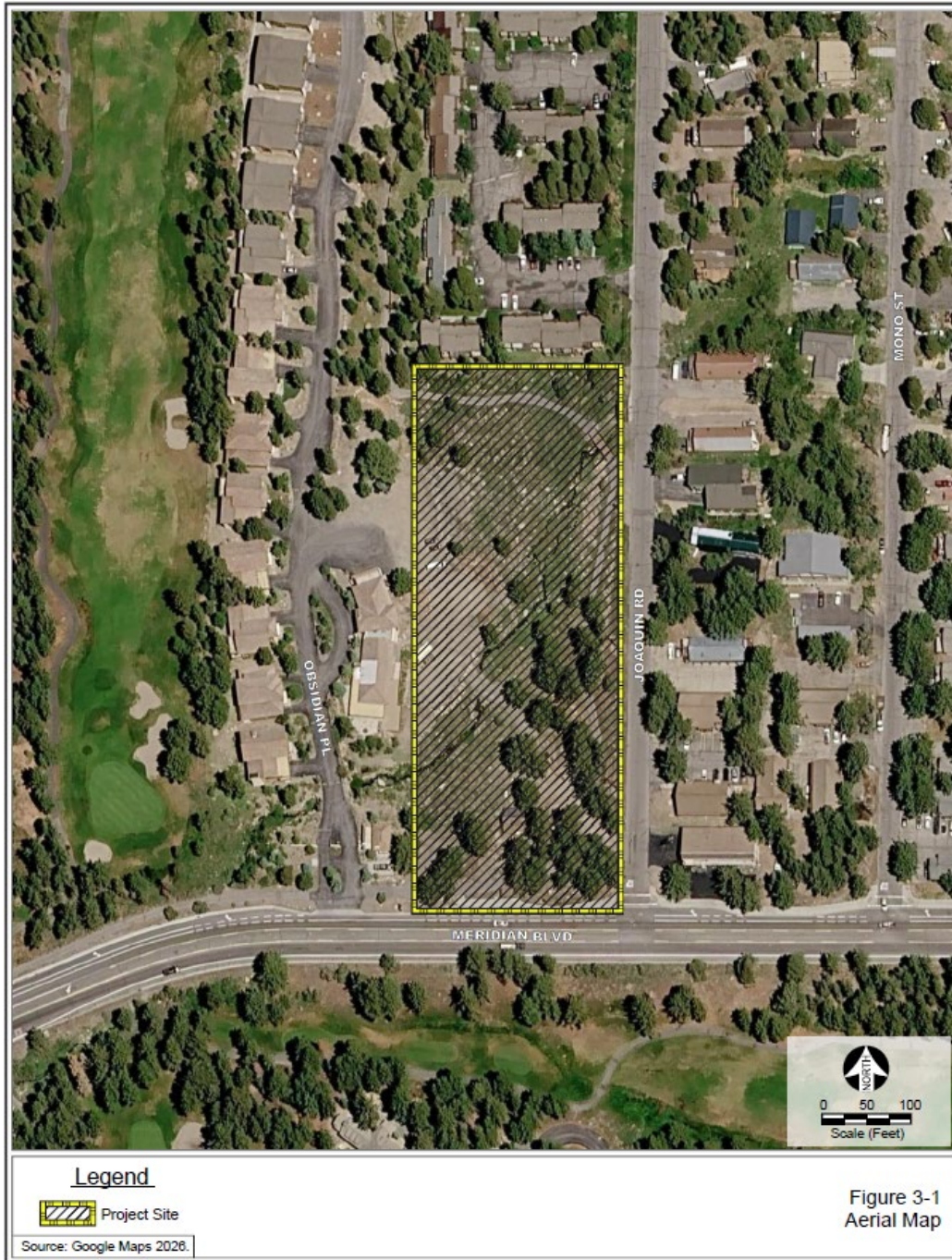
East across Joaquin Road are several 2-story residential use buildings. This area is zoned

¹ Bureau of Land Management: <https://www.arcgis.com/apps/View/index.html?appid=019dd6f39fda4d3b811abfab0878b63b>, accessed September 25, 2025.

² Town of Mammoth Lakes, Zoning Map June 2018: <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/1524/Zoning-Map---June-2018?bidId=>, accessed September 25, 2025.

Residential Multi-family 1.

**Figure 3-1
Aerial Map**



Source: <https://gis.mono.ca.gov/apps/pv/parcel/033170003000>

3.2.3 Regional and Local Access

Regional access is provided by:

- US Highway 395, 3.3 miles east of the Site
- State Route (SR) 203 Highway, 2,550 feet north of the Site

Local access is provided by:

- Meridian Boulevard adjacent south of the Site
- Minaret Road, 550 feet west of the Site
- Joaquin Road, adjacent east of the Site

3.2.4 Bicycle Facilities

There is a bike lane on Meridian Boulevard.

There is a bike path across the southern, eastern, and northern boundaries of the Site.

3.2.5 Public Transit

Eastern Sierra Transit Authority (ESTA) provides the following year-round services:³

- Town Trolley stops at Meriden Boulevard and Joaquin Road every 30 minutes from 7:00 AM to 5:30 PM
- Evening Trolley stops at Meriden Boulevard and Joaquin Road every 30 minutes from 5:30 PM to 10:30 PM

3.2.6 Planning and Zoning

Table 3-1, Project Site, shows the Project Site’s assessor parcel number (APN), zoning, and land use designation.

**Table 3-1
Project Site**

Address	APN	Size (acres)	Zone	Land Use
474 Joaquin Road	033-170-003-000	2.56	RMF-2	HDR-2
562 Joaquin Road	033-170-004-000	0.42		
2604 Joaquin Road	033-170-005-000	0.26		
Mono County GIS: https://gis.mono.ca.gov/apps/pv/parcel/033170003000 , July 7, 2025.				

³ Eastern Sierra Transit: <https://www.estransit.com/>, accessed September 25, 2025.

3.3 Existing Conditions

The Project Site is approximately 140,086 square feet⁴ (3.24 acres).

The Project Site contains a 1,500 square-foot single family home on the southern portion of the Site, a small intermittent drainage running through the center of the Site, and a bike path.

The Site has approximately 95 trees (consisting of 92 Jeffrey Pines, one Lodgepole Pine, one Quaking Aspen, and one Western Juniper).

3.4 Description Of Project

3.4.1 Project Overview

The Project involves the construction of 38 multi-level units (18 buildings) with attached garages, paved driveways, a 24-footwide paved road, and typical utility infrastructure. Foundations will likely consist of concrete perimeters and interior piers. Grading is expected to be minor with buildings set at or near existing grade.

The development will include approximately 84,946 square feet of floor area. Of the 18 buildings, 16 would contain 2 units each (duplexes, total of 32 units), and 2 buildings would contain 3 unit each (triplexes, total of 6 units). Outdoor lighting will include decorative can lights on front porch and rear decks.

The buildings will be approximately 35 feet in height. Master Plan Section 3.A.1 allows 35 feet in Development Area 2.

The Project will include 5,700 square feet of open space.

See **Figure 3-2, Site Plan**.

Figure 3-2 Site Plan

⁴ [Plans](#), Stanley Saitowitz / Natoma Architects, July 29, 2025.



The Project would retain 31 existing trees (all Jeffrey Pine) and would remove 64 trees (61 Jeffrey Pine, one Lodgepole Pine, one Quaking Aspen, and one Western Juniper). The Project would include the planting of approximately 97 plants (16 Desert Olive, 27 Mountain Maple, 39 Quaking Aspen, and 15 Sweet Gum) as replacement for the removed trees.

See **Appendix A** of this MND for floor plans, elevations, sections, and renderings. The Project's units are oriented around the proposed new roadway providing natural light and views of the surrounding nature trees. Overall variation in building appearance is created with the use of various materials, setbacks, balconies, a variety of window sizes, roof overhangs, and contrasting finished colors.

In addition to the residential component of the Project, a storm-drain and associated infrastructure improvements are planned for the Site to address seasonal run-off that crosses the Site. Finally, the Project includes the realignment of the multi-use path along the north, east, and south sides of the Project Site.

3.4.2 Circulation and Parking

Circulation will include a new roadway with 2 operational access points.

Two parking spaces are required per 3-bedroom unit (38 units). This is a total of 76 parking spaces. The Project will provide 76 parking spaces in enclosed garages.

18 exterior guest parking spaces are required and will be provided.

Walkways to and from residential areas, as well as trail connections, will tie into the larger Town-wide recreational trail network which includes pedestrian trails, bike lanes and sidewalks that are adjacent to major roadways such as Meridian Boulevard.

3.4.3 Emergency Access

Emergency vehicles will circulate through the Project area using the internal roadway system. In addition, supplemental fire lanes will be developed in conjunction with the roadway system to provide looped secondary emergency vehicle access and egress. Fire lanes, turning radii, and back up space around buildings will be designed in cooperation with local officials so as to be adequate for emergency and fire equipment vehicles. Pavements will be designed to support loads created by emergency vehicle traffic. Standpipe and fire suppression systems connections will be incorporated into architectural and landscaping design elements where practical and in location accessible to fire equipment.

3.4.4 Snow Management

Snow management will be addressed to ensure that residents and visitors are provided safe and convenient access to and from lodging and within the public use areas throughout the winter season. The adequacy of snow storage areas adjacent to driveways and parking areas will be evaluated based upon zoning code requirements for similar uses. Ground and roof level snow storage areas will be identified. Landscape snow shed areas will be designated and located adjacent to the base of buildings and will be sized to accommodate the anticipated volumes of snow. Roof forms will be designed in coordination with pedestrian areas at the base of buildings. Snow falling from roofs will be directed to landscaped areas at the base for the buildings or to lower level flat roofs. In limited areas, snow rails or fencing, heated gutters, and heated roof edges may be required to prevent snow shed and ice buildup. Snow will not be permitted to shed freely into active pedestrian areas. However, minor snow depths may remain on pedestrian paved areas during cold periods. When snow begins to melt and creates conditions for icing of surfaces, it will be removed or treated with anti-icing agents. Snow will be removed from heavily used pedestrian paved areas, ramps and stairs by snow melt systems. For other circulation routes and pedestrian areas, snow will be removed as soon as practical following snowfall to ensure access by emergency vehicles and easy pedestrian movement.

The snow storage area is required to cover 75% of the pavement area. The pavement area is 31,030 square feet, which results in a snow storage area of 23,273 square feet. The Project would provide 23,460 square feet of snow storage (or 76%), which exceeds the required amount.⁵

3.4.5 Planning and Zoning

⁵ [Plans](#), Stanley Saitowitz / Natoma Architects, July 29, 2025.

The Site is zoned Residential Multi-family 2 (RMF-2). Per the Town Municipal Code Section 17.20.010(b)(4):

This zone is intended as an area for the development of primarily multiple-family developments. Transient occupancy shall be permissible in this zone subject to the issuance of a use permit. Only those uses are permitted that are complementary to, and can exist in harmony with, such residential developments.

Residential uses such as detached, attached, and multi-family dwellings are permitted uses.

The RMF-2 allows a density of 12 units/acre and would provide 38.591 units/acre.

3.4.6 Sustainability Features

The Project will comply with the Town Municipal Code and with the 2025 California Green Building Standards Code (CALGreen, effective January 1, 2026).⁶

All building systems will meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project will include, but not be limited to, WaterSense-labeled plumbing fixtures (or their equivalents) and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design.

3.4.7 Discretionary Actions and Approvals for the Project

The Project is consistent with the zoning designation for the Project Site.

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Tentative Tract Map for the Property and its subdivision into residential units.
- Design Review for the design, layout, material, and colors of the project.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route permit, foundation permits, building permits, including any other discretionary and ministerial permits and approvals that may be deemed necessary.

⁶ California Building Codes: <https://www.dgs.ca.gov/bsc/codes>, accessed September 25, 2025.

Section 4

Evaluation of Environmental Impacts

4.1 Aesthetics

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact.

A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

The Mammoth Lakes Municipal Code sets forth rules and regulations governing the design, use, and display of lighting and signs within the Town. It is acknowledged in the Mammoth Lakes

Municipal Code that the economy of the Town is dependent upon aesthetics, as it is a tourist-based economy. Lighting and signs have the potential to substantially impact the environment and, as such, affect the local economy.

Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. In the area surrounding the Project Site, the existing viewsheds are defined primarily by major view corridors and vistas along nearby roadways (e.g., Meridian Boulevard).

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those which can be seen from vantage points located on private property. Private views are not considered to be impacted when interrupted by land uses on adjacent parcels, specifically if the Project complies with the zoning and design guidelines applicable to the site.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.¹ Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the Town; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

At the ground level, views in all directions are largely constrained by structures and trees on adjacent parcels. No designated scenic vistas in the local area would be impeded, and the Project will not block any scenic vistas.

The Project would not have a substantial adverse effect on a scenic vista. However, as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project to screen construction activities from view.

Development of the Project would not have a substantial adverse effect on a scenic vista. Therefore, no impact would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact.

¹ Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; *Mira Mar Mobile Community v. City of Oceanside*, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

The California Department of Transportation (Caltrans) maintains an official list of State Scenic Highways.

In the vicinity of the Town, State Highway 203 is an eligible State Scenic Highway (not officially designated) and U.S. Highway 395 is an officially designated State Scenic Highway.² Through the Town, State Highway 203 is known as Main Street. Visual impacts on State Highway 203 are not visible from the Site due to distance and intervening buildings and trees. Overall, the proposed buildings would not be visible along State Highway 203 (Main Street). With respect to U.S. Highway 395, the Project would not be visible from any vantage point along its route due to intervening topography and no impact would occur.

The Project would not substantially damage scenic resources within a state scenic highway as no state scenic highways are located adjacent to or near the Project Site. Therefore, no impact would occur.

- c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

No Impact.

The Project Site is located within an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

Zoning

The zoning code allows for 35 feet in height. Projects that detract from the existing aesthetic quality of an area may include, but are not limited to, major contrasts in building height and bulk (e.g., buildings "too big" for a street). The proposed buildings would not be in major contrast to the existing buildings in the area that have since been developed, such as the 2- and 3-story Obsidian development to the west.

The proposed structure height is below the tree line and will not limit views of the surrounding mountains. The structures are also designed to reduce their mass and bulk with sloped roofs to also aid in snow removal. Additionally, the height will accommodate the installation of HVAC Ducting, plumbing, and electrical infrastructure.

The form and mass of buildings developed on the Project Site would retain a relationship to the scale of neighboring buildings and to the size and use of adjacent open space. Doors and windows would be of appropriate size, design, orientation and spacing and would be trimmed with materials and details appropriate to the climate and natural setting of the Eastern Sierra such as wood, wood-like materials, and natural stone. The ground floor of buildings would be scaled to human dimensions by the addition of gables, porches, awnings, and other elements. The Project

² Caltrans State Scenic Highways: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed September 3, 2021.

would be designed to complement the existing alpine architectural character of nearby development and throughout the Town.

Therefore, the Project would not degrade the existing character or quality of the Project Site and its surroundings. Therefore, no impact would occur.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact.

Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary, for a short duration while construction activities conclude for the day and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only.

Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to affect adjacent residential properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur.

Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur, and impacts would be less than significant.

Operation

The Project will construct 18 3-story buildings and interior lighting through windows will increase as compared to the existing setting, which is vacant. Also, the residential nature of the Project will create additional lighting into the night hours. The Project will provide illumination at street level for security.

Fixtures would be of cutoff design to eliminate spill and glare into adjacent areas. Where possible, particularly in parking areas, fixtures would be within landscaped areas. Light fixtures would be decorative as well as functional with detail and ornamentation that complements architectural styles and elements. Prior to occupancy, all lighting on the Project Site shall comply with the applicable requirements of the Town's Outdoor Lighting Ordinance, in accordance with Mammoth Lakes Municipal Code Chapter 17.36.030 (Outdoor Lighting).

Therefore, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and the associated impact would be less than significant.

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have facades that are broken up by various articulation. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Building Code. This will ensure that the building will not create substantial glare.

Thus, based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, no impacts would occur.

Cumulative Impacts

Less Than Significant Impact.

A cumulative analysis of aesthetics impacts includes the Related Projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses.

Related Projects are dispersed within an urbanized environment and are separated from the Project by existing development and public rights-of-way. While each project may incrementally alter the visual character of its immediate surroundings, the changes are consistent with the established urban form and zoning designations of the area. Like the Project, each of the Related Projects are subject to individual design review and regulatory oversight to ensure compatibility with local visual and urban design standards.

The Related Projects would not be visible from the Project Site area, due to distance and intervening structures. No scenic vistas are available from the Project Site area and as such, development of related projects in the vicinity of the Project Site would not result in any cumulative impacts related to scenic vistas. The degree to which each of the Related Project sites contain scenic resources that could be affected by the related projects would be considered by the Town on a case-by-case basis. The Project Site does not contain any scenic resources that are shared by or common to any of the related project sites. Related projects within the Project Site area would be required to undergo review and approval by the Town to ensure compliance with applicable design guidelines, which would ensure continuity of these projects with the visual character/quality standards.

All Related Projects would result in an overall incremental intensification of land uses in the vicinity of the Project Site. However, the Project and Related Projects, including those identified above, would be required to comply with applicable regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Furthermore, as described above, the Project would result in no impacts regarding scenic vistas, visual character, and light and glare.

Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable and cumulative impacts would be less than significant.

4.2 Agriculture and Forest Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact.

The Project Site and surrounding area are designated Urban and Built-Up Land and not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.³ Thus, the Project would not convert farmland to a non-agricultural use. Therefore, no impacts would occur.

- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

³ State of California Department of Conservation, Farmland Mapping and Monitoring Program, Map, websites: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed September 25, 2025.

No Impact.

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁴ The Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract. Therefore, no impacts would occur.

- c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No Impact.

In addition, the Project Site is currently zoned for residential uses and is not zoned and/or used as forest land. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code section 4526, and Government Code section 51104(g). Therefore, no impacts would occur.

- d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact.

The Project Site is located in an urbanized area and is not used as forest land. Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur.

- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

No Impact.

The Project Site is located within an urbanized area and there is no farmland or forest land on or near the Project Site. Therefore, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use. Therefore, no impacts would occur.

Cumulative Impacts

⁴ State of California Department of Conservation, Williamson Act Program, website: <https://www.conservation.ca.gov/dlrp/wa>, accessed September 25, 2025.

No Impact.

The Project and the Related Projects are located within a developed, urbanized area of the Town generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related operations. Therefore, development of the Related Projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use.

Therefore, the Project's contribution to cumulative impacts regarding agricultural resources would not be cumulatively considerable and no cumulative impacts would occur.

4.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based on the following item, which is included as **Appendix B** to this MND:

B Air Quality Technical Modeling, DKA Planning, January 2026.

Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact.

An Air Quality Management Plan (AQMP) for the Town of Mammoth Lakes was adopted on November 30, 1990, to define a plan to attain the federal ambient air quality standards for PM₁₀ (particulate matter, 10 microns). The AQMP, prepared by the Great Basin Unified Air Pollution Control District (GBUAPCD), focused on controlling sources of particulates, particularly in winter months.

In 2014, several years of cleaner air and lower PM₁₀ levels, the GBUAPCD submitted a request to the California Air Resources Board (CARB) and the United States Environmental Protection Agency (USEPA) to redesignate the region as an attainment area for particulates. It developed a Maintenance Plan that demonstrated how compliance with air quality standards could be maintained through 2025 (2014 PM₁₀ Air Quality Maintenance Plan for the Town of Mammoth Lakes). CARB approved the redesignation request in September 2014 and the USEPA approved the redesignation request in October 2015.⁵ A second Maintenance Plan was adopted by the GBUAPCD on September 7, 2023, demonstrating maintenance of the PM₁₀ air quality standard

⁵ <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/4508/3c-Enc-1a-TOML-AQMP-Final?bidId=>

through 2035. However, as of December 2025, US EPA has not taken action on the 2023 Plan. As a result, the 2014 Maintenance Plan is the federally-approved plan (State Implementation Plan) for the Mammoth Lakes PM₁₀ planning area.

The GBUAPCD's 2014 update to the AQMP contains a comprehensive list of maintenance measures to ensure that the region continues to meet the NAAQS. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed project-specific emissions thresholds.

Table 4.3-1 summarizes the Project's consistency with the 2014 PM₁₀ Maintenance Plan for the region and confirms the Project would be consistent with the region's plan to continue to attain the federal air quality standards.

**Table 4.3-1
Consistency with 2014 PM₁₀ Air Quality Maintenance Plan
for the Town of Mammoth Lakes**

Plan Element	Applicable Requirement	Project Consistency Analysis	Consistency Determination
Maintenance of PM ₁₀ Standards	Ensure new development does not interfere with continued maintenance of the PM ₁₀ standards.	The Project would consist of 38 multi-family residential units and would not introduce substantial new PM ₁₀ emission sources. Operational emissions would not exceed the applicable thresholds of significance for all criteria pollutants during both construction and long-term operation. Construction-related PM ₁₀ emissions would be temporary and controlled through standard dust control measures.	Consistent
Construction Dust Control Measures	Implement best available dust control measures during grading and construction activities.	The Project would comply with GBUAPCD Rule 402 and applicable fugitive dust regulations, including watering disturbed areas, covering haul trucks, and stabilizing exposed soils.	Consistent
Reduction of Paved and Unpaved Road Dust	Minimize contributions to paved and unpaved road dust emissions.	The Project would be located in an urbanized area served by paved roadways and would not result in the creation of new unpaved public roads. The paving of the largely unpaved Project Site would reduce fugitive dust emissions that would impact local roads and be entrained by vehicles.	Consistent
Residential Wood Burning Controls	Support measures that reduce PM ₁₀ emissions from residential wood combustion.	The Project would comply with the Town's Municipal Code section 8.30, which regulates particulates. Specifically, it requires that wood heaters and pellet-fueled heaters and fireplaces be EPA-certified. These units would comply with federal Phase II emission limits and ensure consistency	Consistent

		with the region’s plan to maintain federal particulate standards.	
Growth Management Assumptions	Ensure consistency with growth levels assumed in the PM ₁₀ Maintenance Plan.	A 38-unit multi-family development would represent 0.4 percent of the 9,885 housing units estimated in the Town from the American Community Survey from 2019-2023. and would be consistent with population and housing assumptions underlying the Maintenance Plan.	Consistent

- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

Less Than Significant with Mitigation Incorporated.

Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading, and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_x), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction emissions associated with the Project would not be expected to occur on peak emissions inventory days. As stated in the AQMP, construction emissions are “seasonal and are absent during the winter when high PM₁₀ concentrations occur.” Further, “unpaved roads are either snow covered or muddy during the winter season and outdoor building and roadway construction activities generally do not take place until around May when the weather warms.” When Project construction activities would occur during the warmer months, construction fleet equipment would be required to comply with the CARB promulgated emission standards for off-road diesel construction equipment, which would minimize exhaust emissions of PM₁₀ and PM_{2.5} as well as NO_x. As a result, construction activities under the Project would not conflict with or obstruct implementation of the AQMP and construction impacts would be less than significant.

The GBUAPCD regulates temporary air emissions during construction. Rule 401 of the District’s regulations govern nuisances, including odors, smoke, dust, particulates, and other airborne pollution from construction sites. As summarized in Table 4.3-2, the Project would generate short-term emissions of criteria pollutants over four calendar years.

**Table 4.3-2
Daily Construction Emissions**

Construction Phase Year	Daily Emissions (Pounds Per Day)
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**Table 4.3-2
Daily Construction Emissions**

	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2026	3.1	27.9	31.2	0.1	4.4	2.5
2027	1.1	8.6	12.1	<0.1	3.0	1.7
2028	1.1	8.6	11.1	<0.1	0.5	0.3
2029	103.7	8.2	11.0	<0.1	0.5	0.3
Maximum Total	5.2	17.6	11.3	<0.1	2.9	1.6
<p><i>The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.</i></p> <p><i>Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.35 model runs. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in Appendix B.</i></p>						

Since the GBUPACD does not have thresholds of significance for criteria pollutant emissions, any emissions that contribute to PM₁₀ ambient concentrations could be considered potentially significant. Implementation of Mitigation Measure AQ-1 would substantially reduce PM₁₀ emissions.

Mitigation Measure

MM-AQ-1 Best Management Practices During Project Construction

In accordance with GBUPACD Rule 401, the Project Applicant shall require the following best practices during the construction of the Project:

- a. Water all construction areas at least twice daily; water trucks will be filled locally after the contractor makes water acquisition agreements and obtains any required permits.
- b. Cover all trucks hauling soil, sand, and other loose materials.
- c. Apply clean gravel, water, or non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- d. Remove excess soils from paved access roads, parking areas and staging areas at construction sites.
- e. Sweep streets daily (with mechanical sweepers) if visible soil material is carried onto adjacent public streets.
- f. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- g. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- h. Install gravel-bags, cobble entries, or other Best Management Practices (BMPs) and erosion control measures to prevent silt runoff to public roadways/
- i. Replant vegetation in disturbed areas as soon as possible.

- j. Install wheel washers for all exiting trucks or wash off the tires or tracks of all trucks and equipment leaving the construction site.
- k. Suspend excavation and grading activities when wind (as instantaneous gusts) exceeds 25 miles per hour (mph) and when sustained winds exceed 25 mph increase the frequency of watering to three to four times a day.
- l. Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- m. All equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- n. When feasible, alternative fueled or electrical construction equipment shall be used for the Project site.
- o. Use the minimum practical engine size for construction equipment.
- p. Gasoline-powered equipment shall be equipped with catalytic converters, where feasible.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-AQ-1 would ensure potential impacts from construction-related air quality emissions would be less than significant by mitigating for all authorized impacts. The implementation of these best practice measures at the construction site will reduce PM₁₀ emissions from tailpipes and fugitive emissions from disturbance of the Project Site. This impact would be less than significant with mitigation incorporated. Emissions of particulates would be reduced, as illustrated in Table 4.3-3.

**Table 4.3-3
Daily Construction Emissions (With Mitigation Measure AQ-1)**

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2026	3.1	27.9	31.2	0.1	4.4	2.5
2027	1.1	8.6	12.1	<0.1	0.5	0.3
2028	1.1	8.6	11.1	<0.1	0.5	0.3
2029	103.7	8.2	11.0	<0.1	0.1	<0.1
Maximum Total	5.2	17.6	11.3	<0.1	2.9	1.6
<p><i>The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.</i></p> <p><i>Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.35 model runs. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in Appendix B.</i></p>						

Operation

Operation of the residential development will help reduce long-term fugitive emissions of PM₁₀ and PM_{2.5} from the largely unpaved Project Site. The residential development will produce criteria pollutants from area, energy, and mobile sources. Area sources include consumer products such as household cleaners, architectural coatings for routine maintenance, and landscaping

equipment.⁶ Energy sources include electricity and natural gas use for space cooling and heating and water heating. The CalEEMod model generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site.

As shown in Table 4.3-4, the Project would generate negligible emissions when considering the replacement of the existing residence. Emissions of particulates would be reduced or rendered de minimis with the development and its use of propane fireplaces in lieu of the current wood-burning fireplace.

**Table 4.3-4
Daily Operational Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	2.8	1.0	2.7	<0.1	0.1	0.1
Energy Sources	<0.1	0.2	0.1	<0.1	<0.1	<0.1
Mobile Sources	1.1	0.9	6.4	<0.1	1.4	0.4
Regional Total	4.0	2.0	9.2	<0.1	1.4	0.4
Existing Total	-5.4	-0.1	-9.3	<0.1	-1.3	-1.2
Net Regional Total	-1.4	1.9	-0.1	<0.1	0.1	-0.8

Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.35 model runs (included in Appendix B). Totals reflect the summer season maximum and may not add up due to rounding.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Thus, impacts would be less than significant, and no Project mitigation would be required.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise.

There are several sensitive receptors around Project Site that could be exposed to air pollution from construction and operation of the Project, including residences on Obsidian Place, Meridian Boulevard, and Joaquin Road. While earth-moving activities during project demolition, site preparation, and grading would generate some fugitive particulate emissions, implementation of Mitigation Measures AQ-1 would impose best practices measures that reduce all criteria pollutant emissions, including fugitive dust emissions. Further, Rule 401 of the District's regulations would govern nuisances, including odors, smoke, dust, particulates, and other airborne pollution from construction sites. Based on the above, the Project would not expose sensitive receptors to

⁶ In 2021, CARB adopted regulations requiring that all small (25 horsepower and below) spark-ignited off-road engines (e.g., lawn and gardening equipment) be zero emission starting in model year 2024. Standards for portable generators and large pressure washers are given until model year 2028 to be electric-powered.

substantial pollutant concentrations, and impacts would be less than significant with mitigation incorporated.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. Rule 401 of the District's regulations would govern nuisances, including odors, smoke, dust, particulates, and other airborne pollution from construction sites.

With respect to Project operation, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project will introduce a higher density of residential use to the area but would not result in activities that create objectionable odors. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Project is consistent with the land use designation and zoning for the Project Site and is therefore consistent with the growth projections used in the PM₁₀ Maintenance Plan for the region. As such, development of this Project would neither jeopardize the region's PM₁₀ attainment status for nor result in cumulative impacts on particulate air quality. In conclusion, during construction and operation, the Project's regional, localized, and TAC emissions would not be cumulatively considerable, and cumulative impacts would be less than significant.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section is based on the following items, which are included as **Appendix C** to this MND:

C-1 Biological Report, Resource Concepts, September 17, 2025

C-2 Aquatic Resources Delineation Report, Resource Concepts, August 20, 2022

C-3 Arborist Report, Mason Bruce & Girard, October 3, 2025.

Impact Analysis

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less Than Significant Impact with Mitigation Incorporated.

Special Status Plants

Suitable habitat for six listed plant species occurs on-site and may potentially be affected by the proposed activities. Direct effects to special status plant species or their potential habitat would occur when plants or habitat are physically impacted by activities associated with the proposed Project. Direct impacts may include physically breaking, crushing, or uprooting sensitive plants by driving over them with construction equipment, trenching, filling, or grading activities.

Based on the current development plan, implementation of the Project would impact approximately 1.23 acres of Jeffrey Pine habitat from grading and removal of trees and understory vegetation for construction of the residential units, site access, and parking. If present, these actions would result in permanent, direct impacts to potential habitat for six special status plant species.

Indirect effects may result from placement of fill material and soil compaction from heavy equipment that may potentially alter soil characteristics and local hydrologic patterns in sensitive plant habitats. Indirect effects can also occur from the introduction of invasive weeds that may outcompete sensitive species for resources and space over time.

To avoid direct and indirect impacts to special status plant species or minimize potential affect to less than significant levels, the following mitigation measures are proposed.

Any special-status plant species that are identified adjacent to the Project Area, but not proposed to be disturbed by the Project, shall be protected by barrier fencing to ensure construction activities and material stockpiles do not impact any special-status plant species. These avoidance areas shall be identified on Project plans.

Special Status Wildlife

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”

In addition to species covered under the Migratory Bird Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded

protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits "take" or possession of all nongame mammals or parts thereof.

Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered "take" as defined in Section 86 of the California Fish and Game Code.

No special status wildlife species were observed within the Project Area. Based on initial observations of on-site habitat, it was determined that the Project Area does not contain suitable habitat for any special status wildlife species.

The Project Area provides suitable habitat for nesting and/or foraging migratory birds and other special status bird species within the 1.23 acres of Jeffery pine and 1.52 acres of sagebrush habitat. Migratory birds are protected under the MBTA. Additionally, raptors that may be nesting within proximity to the Project Area (not anticipated to be nesting on-site) may be indirectly impacted by construction activities.

Indirect effects from elevated noise and increased human activity may result in nest abandonment if nesting birds are present within 200 feet (or 500 feet for raptors). Construction activities may result in adverse impacts on breeding and nesting special status bird species should they be present.

To avoid impacts to breeding or nesting birds or minimize potential affect to less than significant levels, the following mitigation measures are proposed.

Mitigation Measures

MM-Bio-1 Conduct Special-Status Plant Species Surveys

The applicant shall retain a qualified biologist to perform focused preconstruction surveys to determine the presence/absence of special-status plant species with potential to occur in and adjacent to (within 25 feet, where appropriate) the proposed impact area of each Project component. These surveys shall be conducted in accordance with CDFW Guidelines for Assessing Effects of Proposed Developments on Rare Plants and Plant Communities (Nelson, 1994). Plant surveys will be reviewed and accepted by the Mammoth Lakes Planning Division prior to site disturbance or construction activity.

MM-Bio-2 Implement Avoidance Measures to Protect Special Status Plant Species

If any state or federally listed, CNPS List 1, or CNPS List 2 plant species is found in or adjacent to (within 25 feet) the proposed impact area of each Project component during the surveys, these plant species shall be avoided to the extent feasible. Avoidance measures shall include fencing of the population(s) before

construction, exclusion of Project activities from the fenced-off areas, and construction monitoring by a qualified biologist. Avoidance areas shall be identified on improvement plans. If these plants cannot be avoided, the following measures shall be applied, and the following mitigation measures shall be implemented prior to approval of improvement plans, issuance of grading permits, and/or any clearing:

- An incidental take permit under Section 2081 of the Fish and Game Code (2081 permit). The applicant shall consult with the CDFW to determine whether a 2081 permit is required, and obtain all required authorizations prior to initiation of ground-breaking activities.
- The applicant shall submit a mitigation plan concurrently to the CDFW and the USFWS (if appropriate) for review and comment. The plan shall include mitigation measures for the population(s) to be directly affected. Possible mitigation for impacts to special-status plant species can include implementation of a program to transplant, salvage, cultivate, or re-establish the species at suitable sites (if feasible). The final mitigation strategy for directly impacted plant species shall be determined by the CDFW and the USFWS (if appropriate) through the mitigation plan approval process.

MM-Bio-3 Implement Project Related BMPs to Protect Special Status Species

The following minimization measures would be incorporated into Project design and implementation:

- Fence or flag Project boundaries as necessary and fence sensitive resources to reduce disturbance.
- Clean vehicles and clothing after leaving infested areas and before entering non-infested habitats.
- Wash earthmoving equipment to remove vegetative material before bringing equipment onto the Project Area.

MM-Bio-4 Mitigation for Impacts to Migratory Birds and Raptors

The Project applicant would implement the following practices for protection of migratory birds with the potential to nest within the Project Area.

- Pre-Project surveys for migratory birds and raptors will be conducted in suitable nesting habitat within 500 feet of vegetation removal, construction, and development activities, and will be reviewed and accepted by the Town prior to site disturbance or construction activity. Visual surveys of trees larger than approximately 11 inches in diameter at breast height (dbh) and taller than 30 feet will be conducted. Determination of habitat suitability, and whether a pre-Project survey is required, should be based on a reconnaissance field assessment of habitat conditions before initiating projects in these areas

Survey Timing: March 15 to August 31

- If an active raptor or migratory bird nest is located during the pre-Project surveys (see HMP Table 4-3, Appendix 3.3), notify the County and the CDFW. To avoid disturbances to or loss of active nest sites, between March 1 and August 31, delay Project activities within 0.25 mile of (or at a distance directed by the appropriate regulatory agency) the nest to avoid disturbance until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. The 0.25-mile buffer may be reduced through consultation with the County and/or the CDFW.

Level of Significance After Mitigation

Implementation of the Project may result in adverse impacts to special-status plant species should they be present; this is considered a potentially significant impact. Implementation of the above Mitigation Measures MM-Bio-1, MM-Bio-2, and MM-Bio-3 will reduce this impact to a less than significant level.

Implementation of Mitigation Measure MM-Bio-4 described above would ensure potential impacts to migratory birds and raptors would be less than significant by avoiding the species.

- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less Than Significant Impact with Mitigation Incorporated.

Site grading for buildings, parking, and access roads would result in the removal of vegetation that would temporarily increase soil exposure to wind and water and reduce the local soil resistance to erosion during rainfall events. All Project grading would be subject to the typical restrictions and requirements that address erosion and runoff, including the Federal CWA and NPDES. Because the Project would disturb more than one acre of soil, it would be subject to the typical restrictions and requirements that address erosion and runoff under the SWRCB Construction General Permit, which includes the preparation and implementation of a SWPPP to minimize site erosion and indirect effects to water quality.

The Project would incorporate effective BMPs, including minimization of vegetation removal and installation of temporary erosion and sediment controls that would reduce erosion and stormwater runoff effects. Stockpiles of soil or other erodible materials would be protected with straw wattles and covered when not in use

Site development will impact approximately 760 linear feet of ephemeral stream and approximately 0.01 acres emergent wetland that are potentially regulated by the US Army Corps of Engineers and the Lahontan Regional Water Quality Control Board under Sections 404 and 401 of the CWA and by the CDFW under California Fish and Game Code 1600. Prior to project implementation the project proponent will obtain all necessary permits authorizing permanent impacts to regulated waters and adhere to all permit conditions, minimization measures, and

required mitigation. With obtainment of regulatory permits and authorization to proceed with project implementation from the USACE, LRWQCB, and CDFW, the project would result in less than significant impacts regulated waters.

Mitigation Measure

MM-Bio-5 Obtain Regulatory Permits for Impacts to Aquatic Resources

The Project applicant will apply for and obtain permits from the USACE, LRWQCB, and CDFW for any impacts to regulated waters, including wetlands, and adhere to all permit conditions and mitigation measures to off-set impacts.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-Bio-5 described above would ensure potential impacts to regulated water would be less than significant by mitigating for all authorized impacts.

- c) **Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Less Than Significant Impact with Mitigation Incorporated.

There is one small (0.01 acre) emergent wetland located near the northeast extent of the stream. Water from the intermittent stream flows through Mammoth Lakes to join Mammoth Creek, ultimately flowing into Owens River. Implementation of Mitigation Measure MM-Bio-5 described above would ensure potential impacts to regulated water would be less than significant by mitigating for all authorized impacts.

- d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No Impact.

There are no wildlife movement corridors within the Project Area. The Project Area is surrounded by development on three sides and does not function as a corridor between areas of suitable habitat. Therefore, no impact would occur.

- e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

No Impact.

Mammoth Lakes Municipal Code Chapter 17.36.140 (Tree removal and protection) includes provisions to protect and to regulate the removal of certain trees, based on the important environmental, aesthetic and health benefits that trees provide to Town residents and visitors, and the contribution of such benefits to public health, safety and welfare. This regulates the

removal of healthy trees with a diameter at breast height (DBH) of 12 inches or greater, and establishes submittal, permitting, and mitigation requirements to ensure preservation of the Town's "Village in the Trees" character. Prior to construction, the applicant must obtain a Tree Removal Permit or prepare a Tree Removal and Protection Plan identifying trees to be removed or preserved, implementing protective measures for retained trees, and providing for replacement planting consistent with the Town's standards. Compliance with this ordinance is a regulatory requirement and is not considered mitigation under CEQA, but it ensures that tree resources are appropriately protected and that any permitted removals are offset through replacement planting as directed by the Community and Economic Development Department.

The Site has approximately 95 trees (consisting of 92 Jeffrey Pines, one Lodgepole Pine, one Quaking Aspen, and one Western Juniper). The Project will be required to obtain a tree removal permit and must provide replacement plantings. The Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impact would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact.

The Project is zoned for residential multi-family. The Town does not have an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

Cumulative Impacts

No Impact.

Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located within the vicinity of the Project Site.

Neither the Project Site nor any of the Related Projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur.

As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the Related Projects would comply with applicable regulatory requirements and mitigation measures regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code.

As such, no significant cumulative impacts regarding biological resources would occur.

4.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

No Impact.

Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so, (2) a determination of whether the proposed project will result in a “substantial adverse change” in the significance of the resource or resources. A “substantial adverse change” in the significance of a historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility.

A significant impact would occur if the proposed project would substantially alter the environmental context of or remove identified historical resources. State CEQA Guidelines Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

The threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether the proposed project would cause a substantial adverse change, which is

defined as demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resources is materially impaired.

A review of the State Office of Historic Preservation’s Built Environment Resource Directory (BERD) shows no non-archaeological resources on the Site.⁷

The Project would have no impacts on historical resources. Therefore, potential impacts to historic resources as a result of development of the Project would be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact.

CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area of the Town. The Project would involve grading for the foundation elements, and grading of soils. However, according to the geotechnical report prepared for the Project (Included in Appendix D of this MND), the Project Site is underlain with between two to six feet of undocumented fill and topsoil, and the Project does not include the construction of any subterranean levels. Therefore, it is unlikely that any archaeological resources would be discovered as part of the Project. Nevertheless, should any archaeological resources be discovered during Project construction activities, standard measures would be implemented to address the inadvertent discovery of such resources.

Customary caution and a halt-work condition should be in place for all ground-disturbing activities. In the event that any evidence of cultural resources is discovered, all work within the vicinity of the find should stop until a qualified archaeological consultant can assess the find and make recommendations. Excavation of potential cultural resources should not be attempted by project personnel. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5. Therefore, impacts would be less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact.

⁷ CA Office of Historic Preservation, Built Environment resource Directory: https://ohp.parks.ca.gov/?page_id=30338

Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code §7050.5, Public Resources Code §5097.98 and the California Code of Regulations §15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Mono County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. Once the Coroner determines the remains are Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 24 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 24 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

With the implementation of regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

With regard to historic resources, although impacts tend to be site-specific, cumulative impacts could occur if the Project and Related Projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project.

As discussed above, the Project would not result in any direct or indirect impacts to historical resources. Furthermore, none of the proximate Related Projects would result in any direct or indirect impacts to historical resources. Furthermore, the Project would not diminish the number or significant of historical resources of the same property types, as the Project Site does not contain any historical resources. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the Related Projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each Related Project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the Related Projects, it is expected that measures would be established regarding inadvertent discovery of archaeological or tribal cultural resources would be applied, as necessary.

Overall, based on the above, cumulative impacts to historical resources, archaeological resources, and human remains would be less than significant and would not be cumulatively considerable.

4.6 Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

- a) **Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less Than Significant Impact.

During Project construction, energy will be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction will also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

During construction of the Project, electricity will be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity will be supplied to the Project Site by existing electrical services within the area or efficient generators.

The Project will be designed and operated in accordance with the applicable Building Code and Title 24 regulations which impose energy conservation measures. The majority of the energy usage in the Project would consist of lighting, climate control, and appliance operation. Adherence to the aforementioned energy requirements will ensure conformance with the State’s goal of promoting energy and lighting efficiency.

The Project will have short-term construction impacts, as construction activities consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Electricity will be consumed during the conveyance of the water used during construction activities

that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures will be consumed during Project construction. Electricity consumed during Project construction will be temporary and will cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project will require limited electricity generation that are not expected to have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction will be less than significant.

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas will not be supplied to support Project construction activities; thus, there will be no increased demand generated by construction.

Transportation fuels, primarily gasoline and diesel, will be provided by local or regional suppliers and vendors. Project-related vehicles will require a negligible fraction of the total state's transportation fuel consumption. Further, while construction activities will consume petroleum-based fuels, consumption of such resources will be temporary and cease upon the completion of construction.

Trucks and equipment used during proposed construction activities will comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation.⁸ In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations will also result in efficient use of construction-related energy and reduce fuel consumption. Anti-idling regulations limit the amount of fuel wasted in equipment and trucks that are not in operation. Emissions regulations to control diesel particulate matter (DPM) and NO_x emissions require that engines be more efficient, which results in reduced fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) will be subject to federal fuel efficiency requirements.

Therefore, Project construction activities will comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction will not cause wasteful, inefficient, and unnecessary use of energy. Therefore, construction-related impacts to petroleum fuel consumption will be less than significant.

The Project will utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time.

⁸ The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2485) was primarily adopted to reduce diesel air toxic pollutant emissions from heavy-duty trucks but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by not allowing diesel trucks to idle for greater than 5 minutes at any location. The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, Division 3, Chapter 1, Section 2025) was primarily adopted to reduce pollutant emissions but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by requiring retirement, replacement, or repower of older less efficient, dirtier engines.

CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))⁹ to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or re-power of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations will result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment will result in less fuel combustion and energy consumption, as will the use of haul trucks with larger capacities.

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art technology in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation are expected to be regulated under regulatory energy efficiency requirements.

Therefore, it is assumed that energy usage related to construction materials will be consistent with current regulatory requirements regarding energy usage.

Operation

Operational energy consumption would occur from building energy needs and from transportation fuels (e.g., diesel and gasoline) used for vehicles traveling to and from the additional development in the commercial districts.

The Project must comply with the applicable portions of the Title 24 Building Standards Code and California Green Building (CALGreen) Code. The Project would incorporate applicable General Plan Goals/Policies in a manner to achieve the reductions in energy usage, as well as encourage installing renewable energy sources, recycling, and waste diversion, above and beyond State regulatory requirements. The daily operation of the Project would generate demand for electricity, natural gas, and water supply, as well as generating wastewater requiring conveyance, treatment, and disposal off-site, and solid waste requiring disposal off-site.

During operation of the Project, energy will be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of

⁹ California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>

electronics, equipment, and machinery. Energy will also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips.

Southern California Edison (SCE) provides electrical power to Mammoth Lakes. SCE is required to an energy portfolio from renewable sources and currently provides 43% of carbon-free power.¹⁰ This represents the available off-site renewable sources of energy that will meet the Project's energy demand. The use of renewable energy will indirectly reduce use of fossil fuels required for electricity generation (e.g., natural gas, coal, oil). While the electricity usage rate for a given land use will not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation will be reduced.

The Town is not serviced by a natural gas pipeline; propane tanks are filled for individual properties to provide heating.

The Project-related traffic will result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. Project-related vehicles will require a negligible fraction of the total state's transportation fuel consumption. Further, while construction activities will consume petroleum-based fuels, consumption of such resources will be temporary and cease upon the completion of construction.

Wind energy and solar energy are more efficient on a large-scale basis. The Project would not conflict with the Town's ability to pursue geothermal or small hydro development in appropriate areas and it is likely that some renewable resources could be developed to offset energy consumption by the Project.

Compliance will ensure that the proposed development incorporates energy-efficient windows, doors, insulation, fixtures and appliances, and lighting, heating, air and ventilation systems. The Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact.

The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including: appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition,

¹⁰ SCE, Sustainability Report, 2020: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-2020-sustainability-report-goals-summary.pdf>

the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The Project will be designed to comply with all applicable state and local codes, including the Town's Building Code and the California Green Building Standards Code. Design features that could be implemented include, but are not limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project will incorporate a variety of water conservation features required that also promote energy conservation.

To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels.

Incorporation of these design features, combined with compliance with regulatory standards, would ensure that the Project would not conflict with energy and conservation measures provided by the state or Town, and as such, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

As described above, the Project would comply with existing energy standards, would be consistent with adopted energy conservation plans, and would not result in wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. Therefore, the Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the Project's impacts would not be cumulatively considerable and cumulative energy impacts would be less than significant.

4.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based on the following item, which is included as **Appendix D** to this MND:

D Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025

Impact Analysis

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact.

Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures.

The Mono Lake Long Valley region is part of one of the most active seismic regions in the United States. Seismic activity in the vicinity of the Town is a result of continuing tectonic movement along the eastern front of the Sierra Nevada Mountain Range. Three historically active faults located in proximity to the Town have the greatest potential to create significant ground shaking in the Town. These faults include the Hilton Creek fault (1980 earthquake), the Owens Valley fault (1972 earthquake) and the Chalfant Valley fractures (1986 earthquake). These three faults, as well as six other potentially active faults, have the potential for ground shaking within the Town. While these faults are within proximity to the Town, there are no known Alquist-Priolo Earthquake Fault Zones within the Town.

The nearest splay of the Hartley Springs fault is located 1.36 miles northwest of the Site.¹¹ Ground surface rupture results when the movement along a fault is sufficient to cause a gap or break along the upper edge of the fault zone on the surface. There are no known active, potentially active, or inactive faults that transect the Site.

According to the California Department of Conservation, the Site is not within an earthquake fault zone.¹² Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low.

¹¹ Page 4, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

¹² California Department of Conservation, Earthquake Zones of Required Investigation: <https://maps.conservation.ca.gov/cgs/EQZApp/>, accessed September 25, 2025.

Any development within the Town, buildings or roadways, would be required to comply with the requirements of the California Building Code (CBC) (CCR Title 24). The CBC is based on the Uniform Building Code (UBC), which is used widely throughout United States (generally adopted on a state-by state or district-by-district basis), and has been modified for California conditions with numerous, more detailed and/or more stringent regulations.

Built structures and/or facilities would be constructed in accordance with the requirements of the CBC and the Town's Municipal Code Sections 12.08.076 (Grading and Clearing) and 12.08.080, which requires that grading may be conducted under the following permits within the limits of each: 1) a letter of exemption, for minimal work; 2) a building permit, allowing grading within the footprint and as needed for the foundation excavations; and 3) a grading permit, for all other conditions. Municipal Code Section 12.08.080 requires engineered plans and a soils report to be submitted with an application for a grading permit.

Therefore, buildings and facilities would be designed in accordance with the ground motion parameters that have been calculated for a particular site to withstand seismic ground shaking from the maximum credible earthquake anticipated to occur at a particular project site, as necessary per applicable regulatory requirements. Thus, despite the seismically active area in which the Town is located, impacts associated with seismic ground shaking would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact.

Any development within the Town, buildings or roadways, would be required to comply with the requirements of the California Building Code (CBC) (CCR Title 24). The CBC is based on the Uniform Building Code (UBC), which is used widely throughout United States (generally adopted on a state-by state or district-by-district basis), and has been modified for California conditions with numerous, more detailed and/or more stringent regulations.

Built structures and/or facilities would be constructed in accordance with the requirements of the CBC and the Town's Municipal Code Sections 12.08.076 (Grading and Clearing) and 12.08.080, which requires that grading may be conducted under the following permits within the limits of each: 1) a letter of exemption, for minimal work; 2) a building permit, allowing grading within the footprint and as needed for the foundation excavations; and 3) a grading permit, for all other conditions. Municipal Code Section 12.08.080 requires engineered plans and a soils report to be submitted with an application for a grading permit.

Therefore, buildings and facilities would be designed in accordance with the ground motion parameters that have been calculated for a particular site to withstand seismic ground shaking from the maximum credible earthquake anticipated to occur at a particular project site, as necessary per applicable regulatory requirements. Thus, despite the seismically active area in which the Town is located, impacts associated with seismic ground shaking would be less than significant.

Volcanic Activity

Based on geologic history, geotechnical hazards related to volcanic activity are possible in the project areas. Potential impacts to the Town include inundation by ash deposition, lava, or lahars, or complete destruction from a catastrophic eruption. A comprehensive daily monitoring program of activity along known faults helps scientists to assess the volcanic hazards in the Long Valley area and to recognize the early signs of possible eruptions. The USGS, in cooperation with the California Office of Emergency Services and local jurisdictions in eastern California, has established procedures to promptly alert the public to a possible eruption.

In addition, the Town adopted an Emergency Operations Plan (EOP) in 2001, and last updated in 2017.¹³ The projected increase in intensity of development could result in a slight increase in the population in the Town. However, with the plans in place stated above, impacts regarding volcanic hazards would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact.

Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

Based on the character of surface and subsurface soil and depth to groundwater, there appears to be little potential for liquefaction in the Town. Regardless, any development that would occur as a result of the Project would be built in accordance with the applicable seismic requirements of the CBC and Town of Mammoth Lakes Municipal Code requirements.

The Site is not located within any areas zoned for liquefaction hazards by local/state jurisdictions. The potential for liquefaction is not a design consideration given the lack of a static or perched water table and the relatively dense nature of bearing soils on-site. Further, the potential for ground failures associated with liquefaction (e.g., post-liquefaction reconsolidation, sand boils, etc.) is also not a consideration.

Though groundwater is relatively shallow, and site soils granular, based upon our experience, soil density increases greatly with depth. Therefore, the potential for liquefaction and dynamic settlement are considered low.¹⁴

Therefore, impacts associated with seismic-related ground failure, including liquefaction would be less than significant.

¹³ Mammoth Lakes, Emergency Operations Plan, 2017: <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/11055/Adopted-EOP-08-16-17>, accessed September 26, 2025.

¹⁴ Page 6, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

The Project will comply with design criteria provided in the Geotechnical Investigation including the Uniform Building Code Section 1804.5 (Liquefaction Potential and Soil Strength Loss).

Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Town, for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration.

Based on the above, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant.

iv. Landslides?

No Impact.

Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is located within an urban area. The Project Site is not located in a landslide area as mapped by the State of California.¹⁵

Avalanches and rockslides can be triggered by moderate to large earthquakes in alpine terrain, resulting in the downslope movement of snow and/or rock in both vertical and lateral directions. These hazards typically impact structures located at the base of steep slopes or within the potential flow path. Based on site topography and location, the potential for avalanche impacts at the subject site is considered remote.¹⁶

There are no known landslides near the Project Site, and the Project Site is not in the path of any known or potential landslides. The Project Site's existing topography would not be substantially altered by the Project and development of the Project would not cause landslides. The Project Site is flat.

As such, the Project would not exacerbate existing conditions that would directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Excavation spoils should not be stockpiled adjacent to excavations as they can surcharge the soils and trigger failure. In addition, proper erosion protection, is recommended to

¹⁵ California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed August 4, 2025.

¹⁶ Page 6, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

reduce the possibility for erosion of slopes during grading and building construction. Ultimately, it is the contractor's responsibility to maintain safe working conditions for persons on-site. Appropriate erosion control and drainage devices will be provided to the satisfaction of the Town. Therefore, construction impacts will be less than significant.

Long-term operation of the Project will not result in substantial soil erosion or loss of topsoil. The entire Project Site will be covered by the proposed structures and roadway; thus, no exposed areas subject to erosion will be created or affected by the Project. Therefore, impacts associated with erosion would be less than significant.

Therefore, with compliance with applicable regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil during construction or operation. Impacts would be less than significant.

- c) Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Less Than Significant Impact.

As discussed above, the Project Site would not result in or exacerbate on or off-site landslide or slope stability issues. Therefore, no impacts related to landslides would occur.

As previously discussed, liquefaction-related effects include lateral spreading, which refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. The Project Site is not susceptible to lateral spreading. Therefore, impacts related to lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the potential for subsidence is considered low.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.

Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

- d) Would the project be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Less Than Significant Impact.

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures.

On-site soils consist of silty, fine to coarse sands. Based on these findings, there is a very low expansion potential at the site.¹⁷

The Project would not create substantial direct or indirect risks to life or property with regard to expansive soil. Therefore, impacts would be less than significant.

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact.

The Project Site is served by existing wastewater infrastructure, and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Less than Significant Impact.

Geologic Features

There are no other distinct and prominent geologic or topographic features (i.e., hilltops, ridges, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features. Therefore, no impact would occur.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

According to the Town's General Plan EIR, the paleontological resources records search from the UCMP (University of California Museum of Paleontology) revealed that there are no known

¹⁷ Page 6, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

vertebrate, invertebrate, plant, microfossil, or other fossil localities that have been previously identified within the Project Area or the surrounding vicinity. The closest known vertebrate fossil locality is located more than 30 miles north of the project. Initial consultation of collection records and geologic maps indicate that the Mammoth Lakes area has no history of fossil resources largely because the terrain is dominated by igneous and metamorphic rocks which are not conducive to retaining paleontological resources.

However, there is a low to moderate potential to encounter paleontological resources in glacial deposits within the Town. According to the geotechnical report prepared for the Project (Included in Appendix D of this MND), the Project Site is underlain with between two to six feet of undocumented fill and topsoil, and the Project does not include the construction of any subterranean levels. Therefore, it is unlikely that any paleontological resources would be discovered as part of the Project. Nevertheless, if paleontological resources are encountered during implementation of the Project, ground-disturbing activities shall temporarily be redirected from the vicinity of the find. The Town shall immediately notify a qualified paleontologist of the find. The paleontologist shall coordinate with the Town as to the immediate treatment of the find until a proper site visit and evaluation is made by the paleontologist. Treatment may include the implementation of salvage excavations or preservation in place. Found deposits will be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts related to paleontological resources would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the Related Projects) would expose a greater number of people to seismic hazards. However, as with the Project, Related Projects and other future development project would be required to comply with existing regulatory requirements and the approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular Related Project site.

In addition, in the event that paleontological resources are uncovered, each Related Project would be required to comply with the applicable regulatory requirements, regarding inadvertent discovery of paleontological resources would apply.

Therefore, cumulative impacts related to geology and soils (including paleontological resources) would not be cumulatively considerable and cumulative impacts would be less than significant.

4.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

This section is based on the following item, which is included as **Appendix E** to this MND:

E Greenhouse Gas Technical Modeling, DKA Planning, January 2026.

Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.¹⁸

CEQA Guidelines Section 15064.4(a) assist lead agencies in determining the significance of the impacts of greenhouse gas (GHG) emissions, giving them discretion to determine whether to assess impacts quantitatively or qualitatively. It calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The Town, SCAQMD, Office of Planning and Research (OPR), CARB, California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or

¹⁸ The Less Than Significant Impact determination is based on the analysis included under GHG Threshold (b).

mitigating GHG emissions.¹⁹ This evaluation is the sole basis pursuant to CEQA for determining the significance of a project’s GHG-related impacts on the environment.

The analysis calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project’s GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project’s incremental contribution of GHG emissions because of compliance with regulations requirements adopted to implement plans for reducing or mitigating GHG emissions. However, the significance of the Project’s GHG emissions is not based on the amount of emissions from the Project.

Importantly, GHG emissions are evaluated in a cumulative, global context, and CEQA does not require a project to achieve zero emissions. Instead, significance is determined based on whether a project’s incremental contribution is considerable in light of adopted climate goals and reduction strategies. Given its small size, location within an existing community, and regulatory constraints on energy use, the project’s incremental contribution to cumulative GHG emissions would be minor and not considerable.

Construction

Construction-related GHG emissions would be temporary and short-term, occurring primarily during demolition, site preparation, grading, and building activities. primarily from off-road diesel equipment, worker trips, and material delivery. These emissions would not persist beyond the construction period and would represent a small fraction of regional and statewide construction emissions.

Project construction is anticipated to be completed in 2029 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix E. The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

Construction of the Project is estimated to generate a total of 826 MTCO₂e (Table 4.8-1). The total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project’s operational emissions) to determine the Project’s annual GHG emissions inventory. This results in annual Project construction emissions of 28 MTCO₂e. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix E.

**Table 4.8-1
Combined Construction-Related Emissions (MTCO₂e)**

Year	MTCO ₂ e ^a
2026	332
2027	314
2028	178

¹⁹ CEQA Guidelines, Section 14 CCR 15064.4.

2029	2
Total	826
Amortized Over 30 Years	28
<i>a CO₂e was calculated using CalEEMod version 2022.1.1.35. Detailed results are provided in Appendix E.</i>	
<i>Source: DKA Planning, 2025.</i>	

Operation

Operational emissions would occur over the life of the project and include combustion of natural gas for space heating, water heating, and cooking; electricity consumption for lighting and appliances; and mobile-source emissions from resident vehicle trips. However, the scale of development is modest and would generate low per-capita emissions relative to larger residential or mixed-use projects. Although the project would utilize natural gas, operational emissions would be limited by compliance with applicable California Building Energy Efficiency Standards (Title 24), plumbing efficiency standards, and energy appliance regulations, all of which have been progressively strengthened to reduce fuel use and emissions over time.

GHG reduction strategies are built into compliance with the latest efficiency targets of the applicable building code. California's Green Building Standards (CALGreen) Code includes mandatory measures to support the goals of the State's greenhouse gas reduction program. Reduction in energy demand, water demand, traffic trips, and adding housing to infill sites are all demonstrated to reduce GHG emissions.

The Project would encourage people to walk or bike instead of using a vehicle because it would be an infill site in the Downtown Mammoth Lakes community and within walking and biking trails. This mode shift decreases VMT growth. Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.

Table 4.8-2
Annual GHG Emissions Summary (Buildout)^a
(metric tons of carbon dioxide equivalent [MTCO₂e])

Source	MTCO₂^a
Area ^b	35
Energy ^c (electricity and natural gas)	51
Mobile	226
Solid Waste ^d	9
Water/Wastewater ^e	2
Refrigerants	<1
Vegetation	-5
Construction	28
Total Emissions	346
<i>a CO₂e was calculated using CalEEMod and the results are provided in Appendix E.</i>	

- ^b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
- ^c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
- ^d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
- ^e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
- Source: DKA Planning, 2025.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

California's climate policy framework, including AB 32, SB 32, and the California Air Resources Board Scoping Plans, relies on sector-wide reductions achieved through building standards, energy decarbonization, and land use planning. Small residential projects are expected to demonstrate consistency with these goals by complying with applicable regulations and not obstructing their implementation.

At the regional level, Mono County has adopted a Resource Efficiency Plan (REP), which establishes a greenhouse gas emissions inventory, reduction targets consistent with state goals, and an implementation framework emphasizing:

- Efficient land use patterns;
- Reduced vehicle miles traveled (VMT);
- Energy efficiency in buildings; and
- Periodic monitoring and plan updates.

The Town of Mammoth Lakes General Plan includes goals and policies related to climate change and GHG emissions. Goal R.11 calls for reductions in community-wide GHG emissions and consistency with state climate objectives. The General Plan framework anticipates continued residential development within the Town to meet housing needs while implementing energy efficiency, transportation planning, and environmental protection measures. Additionally, the Resource Management and Conservation Element of the General Plan includes goals and policies related to energy conservation and resources, green building practices, and air quality that would aid to reduce GHG emissions in the Town. The Town of Mammoth Lakes has adopted by reference the CALGreen Code in Chapter 15.04 of the Municipal Code. As discussed previously, the CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.

The analysis of a project's impact on GHG emissions during long-term project operations typically considers emissions from mobile sources, stationary area point sources, energy and water demand, and wastewater and solid waste generation. The Project is consistent with the zoning and density for the Site. Therefore, the approved buildout for construction and operation purposes is assumed to be included in the Town's projected planning processes, including in the VMT estimates for the Town under the General Plan.

Neither the Town nor the GBUAPCD have established numerical air quality significance thresholds for quantitatively determining GHG emission impacts.

In accordance with the CEQA Guidelines, the Office and Planning and Research encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The Town of Mammoth Lakes does not have a programmatic mitigation plan specific to GHG emissions to tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the Town has adopted the CALGreen Code that requires applicable projects to implement energy efficiency measures. In addition, the California CAT (Climate Action Team) Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05. Thus, if the project is designed in accordance with these policies and regulations, it would result in a less than significant impact, since it would be consistent with the overarching State regulations on GHG reduction (AB 32).

In accordance with the CALGreen Code, the Project would incorporate the following features supportive of goals to reduce GHG emissions:

- **Energy Conservation:** New development would be required to reduce energy demand in accordance with the Title 24 Building Standards Code. The Town would ensure that new developments meet or exceed the applicable standards prior to building permit issuance.
- **Water Conservation:** New development would be required to reduce indoor and outdoor water demand in accordance with the Title 24 Building Standards Code. The Town would ensure that new developments meet or exceed the applicable standards prior to building permit issuance.
- **Resource Conservation:** New development would be required to recycle, reuse, or divert from landfills at least 50% of nonhazardous construction waste (by weight). The Town would ensure that new developments meet or exceed the applicable standards prior to grading permit issuance.

Consistency with the State’s Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32 that has been updated over time to reflect updated strategies.²⁰ In addition, SB 32 was approved in 2016, calling for deeper GHG emissions reductions by 2030. The *2017 Climate Change Scoping Plan* addresses the 2030 horizon and has a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the *2017 Climate Change*

²⁰ Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

Scoping Plan Update. As discussed therein, the Project will be consistent with the GHG reduction-related actions and strategies of the *2017 Climate Change Scoping Plan Update*.

In November 2017, CARB adopted a Climate Change Scoping Plan (2017 Scoping Plan) that addressed how long-term objectives could be met, including SB 32 targets in 2030. Specifically, the 2017 Scoping Plan states that the Plan “establishes a path that will get California to its 2030 target” and “identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40% from 1990 levels.” (2017 Plan at pp. 1).²¹

Studies confirm CARB’s determination that the state’s existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40% below 1990 levels by 2030, and to 80% below 1990 levels by 2050 if additional appropriate reduction measures are adopted.²² Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and regulations not analyzed in the studies could allow the state to meet the 2050 target.

In addition, on May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan (CARB’s First Update).²³ CARB’s Update “lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050,” and many of the strategies recommended would serve to reduce the Project’s post-2020 emissions level to the extent required by applicable by law (CARB’s First Update, p. 4 and Table 6 pp. 94-99).

When compared to SB 32, the Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2017 Scoping Plan. Table No. 1, below, follows the same approach used in the Draft EIR for evaluating consistency with CARB’s AB 32 Scoping Plan, which was adopted to meet the goals of AB 32 (Draft EIR, pp. 4.F-34 to 35; Table 4.F-7).^{24, 25} The 2017 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been

²¹ California Air Resources Board California’s 2017 Climate Change Scoping Plan, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

²² Energy and Environmental Economics (E3). “Summary of the California State Agencies’ PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios” (April 2015); Greenblatt, Jeffrey, Energy Policy, “Modeling California Impacts on Greenhouse Gas Emissions” (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state’s goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors. https://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf

²³ California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014; https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

²⁴ Ibid

²⁵ California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document, August 2011; https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/final_supplement_to_sp_fed.pdf

formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the following analysis, the Project will be consistent with the State's Climate Change Scoping Plan's objective of reducing 2030 GHG emissions in accordance with SB 32.

In addition to the Project's consistency with applicable GHG reduction regulations and strategies, the Project will not conflict with future anticipated statewide GHG reductions goals. Specifically, CARB has outlined strategies for achieving the 2030 reduction target of 40% below 1990 levels, as mandated by SB 32. These strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the penetration of zero-emission or hybrid vehicles into the vehicle fleet, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.

The Project will also benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. SCE has committed to increasing renewable sources that exceed the Renewables Portfolio Standard requirements. The Project will also include energy efficient mechanical systems, energy efficient glazing and window frames, and the use of high-efficiency lighting. The Project will also benefit from statewide efforts to improve fuel economy of vehicles.

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40% below 1990 levels by 2030, and to 80% below 1990 levels by 2050 if additional appropriate reduction measures are adopted.²⁶ Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40% below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Table 4.8-3, Consistency with Applicable Greenhouse Gas Reduction Strategies, contains a list of GHG-reducing strategies potentially applicable to the Project. The analysis describes the consistency of the Project with these strategies.

²⁶ Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

**Table 4.8-3
Consistency with Applicable Greenhouse Gas Reduction Strategies**

Source	Description	Consistency
AB 1493 (Pavley Regulations)	Reduces greenhouse gas emissions in new passenger vehicles from 2012 through 2016 (Phase I) and from 2017 through 2025 (Phase II).	Consistent. The Project is a residential development that does not directly impact passenger vehicle technologies. However, the Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	Consistent. The Project is a residential development that does not directly impact power plant concerns. The Project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Consistent. The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	Consistent. The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE Appendix G and Title 24 Building Code (the version in effect at the time of building permit issuance for implementing projects).
	HVAC Systems will be designed to meet ASHRAE standards.	Consistent. The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE Appendix G and Title 24 Building Code (the version in effect at the time of building permit issuance for implementing projects).
	Air filtration systems are required to meet a minimum of MERV 8 or higher.	Consistent. The Project would meet or exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	Consistent. The Project would meet this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles as specified in the CALGreen Code.	Consistent. The Project would meet this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips as specified in the CALGreen Code.	Consistent. The Project would meet this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Stormwater Pollution Prevention Plan (SWPPP) required.	Consistent. The Project would meet this requirement.

**Table 4.8-3
Consistency with Applicable Greenhouse Gas Reduction Strategies**

Source	Description	Consistency
	Reduce indoor water usage by installing low- flow fixtures as specified in the CALGreen Code and/or reduced indoor water usage by 20 percent compared to California Building Code Standards baseline flow rates.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	Consistent. The Project would meet this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to California Building Code Standards baseline flow rates.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Requires use of low VOC coatings consistent with SCAQMD Rule 1168.	Consistent. The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	Consistent. The Project would be consistent with the CARB Air Toxics Control Measure (ATCM) to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) or meet local ordinance, whichever is more stringent.	Consistent. The Project would exceed this requirement as part of its compliance with the Town's requirements and the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. The Project would utilize energy efficiency appliances and equipment and would exceed the energy standards in ASHRAE Appendix G and the Title 24 Building Standards Code (the version of the standards in effect at the time of building permit issuance for implementing projects).
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development	Consistent. The Mobility Element would reduce Town-wide VMT though the provision of sidewalks, bike paths, and transit service.

**Table 4.8-3
Consistency with Applicable Greenhouse Gas Reduction Strategies**

Source	Description	Consistency
	along transit corridors, and implementing intelligent transportation systems.	
	Reduce energy use in private buildings.	Consistent. The Project would utilize energy efficiency appliances and equipment and would exceed the energy standards in ASHRAE Appendix G and the Title 24 Building Standards Code (the version of the standards in effect at the time of building permit issuance for implementing projects).

The Project would not interfere with, delay, or undermine the implementation of the Mono County REP, Town of Mammoth Lakes General Plan policies, or State climate regulations. Instead, it would contribute housing within an existing community consistent with adopted planning assumptions.

Cumulative Impacts

As explained above, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis, because climate change is a global problem, and the emissions from any single project alone would be negligible. Accordingly, the analysis above considered the potential for the Project to contribute to the cumulative impact of global climate change.

The analysis shows that the Project is consistent with CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

4.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact.

Construction

The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During site preparation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. While some hazardous materials used during construction could require disposal,

such activity would occur only for the duration of construction and would cease upon completion of the Project.

In addition, all potentially hazardous materials to be used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction.

Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Operation

The Project does not involve the routine use, transport, or disposal of hazardous materials during operation. The Project includes the development of residential uses. This typical urban use does not involve the routine use of hazardous materials. For example, the proposed use would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping.

The Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. The applicable regulatory requirements further ensure that the minimal number of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Tenants may occasionally store household chemicals or small amounts of materials, but such use is strictly regulated by lease agreements and facility policies prohibiting the storage of flammable, corrosive, or hazardous substances.

The facility is not an industrial or processing use, and no large-scale hazardous materials handling is expected.

Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

- b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant Impact.

The Project is a residential use.

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows that there are no oil and gas well on the Project Site.²⁷ The nearest is a geothermal well is 0.5 feet northwest of the Site along Viewpoint Road.

The Project will be maintained in a neat, attractive, and safe condition at all times. On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times. Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers shall be emptied a minimum of once per week. Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris. Accordingly, operational impacts will be less than significant.

- c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less Than Significant Impact.

There is one school within 0.25 miles (1,320 feet) of the Project Site:

- Mammoth Montessori Children’s Preschool, 332 Manzanita Road, 920 feet northeast of the Site

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products.

Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations.

As such, the use of such materials would not create a significant hazard to nearby schools, and impacts would be less than significant.

²⁷ California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed September 25, 2025.

- d) **Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?**

Less Than Significant Impact.

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), leaking underground fuel tanks (LUFT) or Spills, Leaks, Investigation, and Cleanup (SLICS) sites on, in, or under the Project Site.²⁸

The Norco Service Center facility (EDR ID #S102434423 and #U001586937) is listed as a HAZNET and HIST UST site, and is also listed with the Leaking Underground Storage Tank Information System (LUST) and with the Cortese Hazardous Waste and Substance Sites List (CORTESE). The service center is located at 3670 Main Street, approximately 2,550 feet north of the Site. The service center is currently permitted to handle waste and mixed oils. A gasoline leak was discovered in Spring 1996; the contaminated material was subsequently excavated and disposed of under purview of Mono County Environmental Health Department (MCEHD), which closed the case in October 1996.²⁹ Therefore, the unauthorized release at the Norco Service Center has no potential to affect activities on the Project Site.

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites, waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.³⁰

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.³¹

There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.³²

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.³³

The Project Site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment.

²⁸ CA Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, September 25, 2025.

²⁹ Geotracker file: https://geotracker.waterboards.ca.gov/profile_report?global_id=T0605100027

³⁰ CA State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, September 25, 2025.

³¹ CA Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed September 25, 2025.

³² CA Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, accessed September 25, 2025.

³³ CA Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, accessed September 25, 2025.

None of the above database listings are associated with hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on the above analyses, while the Project is identified on standard government sources that monitor hazardous materials, conditions on the Project Site would not create a significant hazard to the public or the environment and impacts would be less than significant.

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

No Impact.

The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. There are no nearby airports or private airstrips. Mammoth Yosemite Airport is located approximately 6 miles to the southeast. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels.

The Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur.

- f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less Than Significant Impact.

Development of buildings or roadways would be subject to compliance with emergency access standards and requirements specified by State Fire Code and the Town's Municipal Code, as well as the Town's General Plan, where appropriate. In addition, it is acknowledged that the Town has an adopted EOP for emergency response within the Town. The Town adopted an Emergency Operations Plan (EOP) in August 2017. Mammoth High School has been designated as a disaster shelter in the Town of Mammoth Lakes.³⁴

Project implementation would not impair implementation or physically interfere with the EOP, because no circulation changes are being proposed which conflict with the procedures set forth in the EOP. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

³⁴ Mammoth Lakes, Emergency Response Plan, 2017: <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/11055/Adopted-EOP-08-16-17>

Therefore, the construction and operation of the Project would not impair the implementation of the emergency response plan, and impacts would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact.

The characteristics of the Town, including limited points of entry/exit and location near forested land present unique fire hazard problems. Wildfires can result in death, injury, economic loss, and heavy public investment in firefighting efforts. The Project would allow intensification of development in the Town's center, which would increase residential and visitor populations and, thus, expose more people to wildland fires. For this purpose, the Town of Mammoth Lakes maintains the EOP, which sets forth the responsibilities, functions, and operations of the Town government and its interrelationship with other agencies and jurisdictions to provide emergency services during such events as wildfires.

In addition, the Eastern Sierra Fire Safety Council (ESRFSC) prepared a Fire Safety Plan to help residents improve defenses against wildfires. The ESRFSC is made up of private citizens and advised by the U.S. Forest Service (USFS), California Department of Forestry and Fire Protection (CDFFP), and the Bureau of Land Management (BLM). Fire hazard and risk are measured by the amount of fuel available to burn at any given time and the likelihood that an ignition would occur. The risk factors are used to provide a relative ranking of fire risk, hazard, and susceptibility to a large, severe fire. Fire hazard severity for Mammoth Lakes, which has been mapped by the CDFFP, is considered "very high." In response to this rating, USFS crews began the construction of the Mammoth Lakes Fuelbreak, which is funded by the National Fire Plan (NFP) for the Inyo National Forest.

The Town's EOP, which meets the state's Standardized Emergency Management System (SEMS) requirements, provides emergency response procedures such as identification of critical hazard areas, locations for meeting and staging in an emergency event, communications, and emergency evacuation. In a disaster situation, the Town would provide an Emergency Operations Center (EOC), which is equipped with emergency communication equipment and cooking, showering, and sleeping facilities. Other EOCs include the Mammoth Community Water District (MCWD) office, Fire Station 2, Police Department, Canyon Lodge, and other facilities. Radio and satellite communications would be utilized to maintain communications should other systems fail and local radio and television would be utilized to notify residents and visitors of an emergency.

With improvements to the transportation system and the effective use of EOCs and other procedures set forth in the EOP and NFP, risk to the Town related to wildfires would be less than significant.

The Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

None of the Related Projects involve industrial or commercial activities that would result in the routine transport, use, or disposal of hazardous substances in significant quantities. The self-storage facility would prohibit the storage of flammable or toxic materials through tenant agreements, and residential uses typically involve only household-level hazardous products. There is no indication that the combined development would impair emergency response or evacuation capabilities or result in overlapping hazardous conditions.

Development of the Project in combination with the Related Projects has the potential to increase the risk of an accidental release of hazardous materials. However, each of the Related Projects would be required to comply with all applicable local, state, and federal laws, rules and regulations pertaining to the use, storage, and/or transport of hazardous materials, as discussed above for the Project. Furthermore, each Related Project would be required to be evaluated for project-specific hazardous risks. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties.

Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the Related Projects and the Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

4.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based on the following item, which is included as **Appendix F** to this MND:

F Drainage Report, BKF Engineers, June 17, 2025

Impact Analysis

- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less Than Significant Impact.

The Stormwater Pollution Prevention Plan (SWPPP) prepared for construction of the Project must also address hazardous materials storage and use, erosion and sedimentation control, and spill prevention and response in addition to identifying measures for preventing non-stormwater discharges to surface water drainages and the Town's storm drain system. In addition, provisions for implementing the land development policy and guidelines pertaining to the Mammoth Lakes area in the Basin Plan must be included in the SWPPPs. The required implementation of the BMPs in the Project's SWPPP would ensure that Project construction activities within the SSMP area would not cause the violation of any water quality standards within Mammoth Creek. Thus, the Project would not be considered to have a significant impact on the ability of Mammoth Creek to attain all applicable water quality standards.

Activities associated with operation of the Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking areas and the internal roadway surfaces could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality generated from Project operation can be reduced through the proposed implementation of BMPs designed to be protective of receiving water quality. These BMPs include detention and sedimentation basins designed to filter runoff from paved areas on the Project Site. Therefore, impacts would be less than significant.

Overall, as analyzed above, the construction or operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

- b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Less Than Significant Impact.

Shallow groundwater seepage and the presence of mottled soils were observed throughout the Site. Groundwater seepage was encountered in all test pits except TP-1A, which was excavated in December 2023 well after runoff had subsided. Although no seepage was observed in TP-1A at the time of excavation, mottled soils indicative of a seasonally high groundwater table were noted. Moderate to heavy seepage conditions were observed in the other test pits at depths ranging from approximately 2 to 6 feet below ground surface.³⁵

³⁵ Page 3, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

Groundwater seepage may however be encountered during construction as well as after construction as a result of snowmelt runoff, rainfall, and/or landscape irrigation. To reduce seepage, a perimeter subdrain should be installed surrounding the structure.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Regarding groundwater recharge during operation, the Project would develop hardscape and structures that would cover the majority of the Project Site with impervious surfaces. The Project would include the installation of LID BMPs, which would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Overall, construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin and impacts during construction and operation of the Project would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on or off-site;

Less Than Significant Impact.

Construction activities for the Project would involve grading and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

Grading shall be limited to the extent possible. Graded areas shall be protected against erosion once they are brought to final grade. No graded areas are to be left unstabilized between April 15th and October 15th. This project lies within the boundaries of the Lahontan Regional Water Quality Control Board and shall conform to the requirements of the SWPPP, the National Pollutant Discharge Elimination System (NPDES) Permit for General Construction Activities. Therefore, impacts would be less than significant.

The Project would develop hardscape and structures that would cover the majority of the Project Site with impervious surfaces. Accordingly, there would be a limited potential for erosion or siltation to occur from exposed soils. The Project would include BMPs that would address drainage flows and would ensure that substantial soil erosion or siltation does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

Overall, the Project would comply with all applicable state and local requirements regarding stormwater management. Through compliance with these regulatory requirements, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off-site. Thus, impacts would be less than significant.

- ii. **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;**

Less Than Significant Impact.

The Site consists of a creek which runs from the southwest corner to the northeast corner of the property. The site drains from southwest to northeast with average slopes ranging from 4% to 11%. Based on available existing topography, the site receives runoff from the adjacent property to its west. Overland flow from the site and the existing creek discharge at an open-air catchment with a concrete headwall. This catchment detains runoff before ultimately discharging into an existing 36-inch storm drain main, which flows north along Joaquin Road.³⁶

The Project consists of two separate storm drain systems. One storm drain system will redirect runoff from the existing creek around and along the south and east sides of the site. A separate storm drain system with storage piping for retention is proposed to capture runoff from on-site improvements and the off-site surface runoff from the west. The project site will maintain its overall drainage pattern of flowing from the southwest to the northeast at an average site slope of 4.5%. The retention pipe will have an ultimate discharge at the existing 36-inch storm drain located at the northeast corner of the site on Joaquin Road.³⁷

The storm drain system is designed to convey flows from the 20-year storm event, while the retention facility is sized to capture and store the 100-year peak flows that exceed the 20-year design capacity.³⁸

The Project would develop hardscape and structures that would cover the majority of the Project Site with impervious surfaces. As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm

³⁶ Page 2, Drainage Report, BKF Engineers, June 17, 2025

³⁷ Page 2, Drainage Report, BKF Engineers, June 17, 2025

³⁸ Page 8, Drainage Report, BKF Engineers, June 17, 2025

drainage infrastructure. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site. Thus, operational impacts to flooding would be less than significant.

Overall, with implementation of BMPs and compliance with applicable regulatory requirements including grading requirements regarding erosion control and state and local requirements regarding stormwater management, the Project would not increase the rate or amount of surface runoff in a manner that would result in flooding on or off-site. Thus, impacts would be less than significant.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

Less Than Significant Impact.

The Project Site currently does not have BMPs for the management of pollutants or runoff. Implementation of Project BMPs would control stormwater runoff and could ultimately result in a minor decrease in runoff compared to existing conditions. In addition, the implementation of BMPs required by LID would target the pollutants that could potentially be carried in stormwater runoff.

Consequently, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

- iv. Impede or redirect flood flows?**

Less Than Significant Impact.

Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone.³⁹ These areas are subject to inundation by a flood having a one percent or greater probability of being equaled or exceeded during any given year.

Based upon a review of the FEMA Flood Hazards areas map 06051C1388D, 2/18/2011) for the Mammoth Lakes area the site is in Zone X outside of a special flood and/or 0.2% annual chance flood plain.⁴⁰

The Project will incorporate standard flood-resistant construction practices, such as proper site grading and stormwater management systems, to mitigate any potential flood risks. The Project will include stormwater LID requirements in its design, which mandates on-site stormwater capture and management and proper site grading and drainage improvements to prevent on-site

³⁹ FEMA, National Flood Hazard Lay (NFHL) Viewer <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed September 25, 2025.

⁴⁰ Page 8, Geotechnical Investigation, Sierra Geotechnical Services, July 10, 2025.

flooding. This will ensure no issue with flooding potential. Accordingly, the Project does not have any flooding issues that could validly be considered unusual circumstances.

As long as the building is designed to comply with floodplain management regulations, there is no substantial risk to human safety, structures, or the environment. Therefore, impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact.

There are no major water-retaining structures located immediately upgradient from the Project Site. Therefore, flooding from a seismically-induced seiche is considered unlikely.

The Project is not located within an area potentially impacted by a tsunami.

Overall, the Project would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact.

The Lahontan RWQCB adopted the Water Quality Control Plan (Basin Plan) for the Lahontan Region (last amended in 2019).⁴¹ The Basin Plan designates the beneficial uses of receiving waters, including Mammoth Creek to which the Project Site ultimately discharges via the Town's storm drain system, and specifies both narrative and numerical water quality objectives for these receiving waters. Water quality objectives, as defined by the California Water Code Section 13050(h), are the "limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses or the prevention of nuisance within a specific area." Because these standards are applicable to receiving waters, they do not apply directly to stormwater runoff from the Project Site. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Project and these Related Projects, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would reduce impacts to a less than significant level. Furthermore, the Project would not result in any water quality

⁴¹ Water Quality Control Plan For The Lahontan Region:
https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/

related impacts and would not increase peak stormwater flows from the Project Site. Therefore, the Project would not contribute to cumulative impacts regarding hydrology and water quality.

4.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) Would the project physically divide an established community?

No Impact.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any rights-of-way. The Project will be built on an existing urban infill site and is contiguous and bounded by streets and surrounding residential uses. In addition, the Site is not large enough to encompass an established community.

The Project would be constructed within the boundaries of the Project Site and the proposed uses would be located within the building. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community.

The Project would not physically divide an established community. Therefore, no impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact.

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

A project is considered consistent with the provisions and general policies of applicable City or regional land use plan and regulation if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals.⁴² More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

The Project is generally consistent with the General Plan and Municipal Code. The requested discretionary actions sought by the Project do not conflict with existing land uses in the area, and the Project will not introduce incompatible uses. Moreover, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project, therefore, considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site, based on detailed review of the relevant documents.

Consistency with the Town of Mammoth Lakes General Plan

The Project is consistent with the Town of Mammoth Lakes General Plan because it advances the Plan’s primary housing and community objectives: increasing the supply of multi-family and workforce housing within Town limits, concentrating residential development in existing neighborhoods, and supporting a compact “Village in the Trees” community form. The site is already identified in Town planning/housing inventories as an opportunity site for residential development, and the project’s location on Joaquin Road places new housing near existing residences, pedestrian connections, and local transit service, consistent with the General Plan policies that encourage infill housing, multimodal access, and proximity to services. The proposal also incorporates site-sensitive design measures (landscaping, tree protection/ replacement, and building siting) to preserve neighborhood character and the Town’s scenic and environmental objectives.

Consistency with Applicable Zoning and Development Standards

The project is compatible with the property’s residential zoning context and anticipated RMF (residential multi-family) designation. The RMF-2 allows a density of 12 units/acre and would provide 38.591 units/acre. This is within a moderate density range appropriate for multi-family development on an opportunity site in Mammoth Lakes. The proposed buildings will be sited, designed, and revised as necessary to conform to applicable zoning development standards (setbacks, height limits, lot coverage, parking and loading, snow storage requirements, and landscape/open-space standards). Parking, vehicular access, and snow storage will be provided in accordance with the Municipal Code and the Town’s engineering standards to ensure year-round access and maintenance. Any required variances or adjustments will be pursued only if

⁴² *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th.704, 719.

demonstrated to be consistent with the zoning findings and not detrimental to neighborhood character.

Compliance with Mammoth Lakes Municipal Code and Other Local Regulations

Project approvals will comply with Town regulatory requirements, including but not limited to: the Town's design review and building permit process, stormwater/runoff control and grading permits, and fire and life-safety standards (including defensible space / fuels reduction around structures as required by the Fire District). The project will also comply with Municipal Code Section 17.36.140 (Tree Removal and Protection): trees 12-inch DBH or greater will be identified on a Tree Removal and Protection Plan, and any permitted removal will be offset by replacement planting per the Town's standards. Required utility connections (water, sewer, electric) and any necessary frontage improvements will be coordinated with Town public works and utility providers prior to grading and building permits. Conformance with these mandatory regulatory requirements will be documented on final construction drawings and conditions of approval; these measures represent regulatory compliance rather than CEQA mitigation.

To ensure compatibility with surrounding development and Town policies, the project will include the following site-sensitive measures: building massing and façade articulation to reduce perceived scale; retention and protection of significant trees where feasible; a tree replacement and landscape palette drawn from the Town's recommended plant list; provision of on-site snow storage and plowing access; adequate on-site parking and EV-ready parking stalls per code; pedestrian and bicycle connections to Joaquin Road and nearby transit stops; and stormwater quality controls sized to Town standards. Collectively, these design commitments promote neighborhood compatibility, public safety, and compliance with the Town's environmental and community character objectives.

Therefore, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Related Projects primarily consist of infill development. As such, similar to the Project, the proposed construction associated with the Related Projects would be confined to the Related Project sites and would not physically divide a community. The uses proposed by the Related Projects, including office and fast food restaurant uses, would also be compatible with the various uses throughout the Project Site.

In addition, as with the Project, the Related Projects would be required to comply with relevant land use plans, policies, and regulations. Because the approval of the Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Furthermore, the Related Projects would also have to demonstrate that they do not conflict with applicable land use plans.

As such, based on the above, cumulative impacts related to the physical division of an established community and cumulative impacts related to conflicts with land use plans, policies, or regulations would be less than significant.

4.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact.

Mineral resources in the Mammoth Lakes region include industrial minerals (clay, aggregate, cinders, etc.) and precious metals associated with volcanic rocks and hot spring and geothermal activity. The Project does not incorporate heavy industrial uses that would increase demand or availability of minerals and does not propose mineral development activities. The construction of new buildings would not occur in areas of known mineral resources, which are located within the southern portion of the Town, approximately 2 miles southwest of the Site.⁴³

No mineral extraction activities are presently conducted or proposed on the Project Site. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The Project Site is not within the designated boundaries of any general, specific or land use plan designated for the extraction of any locally-significant mineral resources.

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows that there are no oil and gas well on the Project Site.⁴⁴ The nearest is a geothermal well is 0.5 feet northwest of the Site along Viewpoint Road. Therefore, no impact would occur.

⁴³ Mammoth Lakes, General Plan EIR, 2007, Figure 4.4-1 (Mineral Resources Map).

⁴⁴ California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed September 25, 2025.

Mineral resources are governed by the California Department of Conservation’s Division of Mine Reclamation and identified by the California Geological Survey (CGS). Any extraction is covered by applicable regulations. The Site is an infill location that makes any extraction infeasible due to the nuisance potential of nearby residential uses. The Project would not result in the loss of availability of a known mineral resource. Therefore, no impact would occur.

- b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact.

No mineral extraction operations currently occur on the Project Site. Furthermore, the Site is surrounded by urban uses, roads, and sensitive residential receptors. Thus, the Site would not be an adequate candidate for mineral extraction. The Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

The Related Projects are located within a developed, urbanized area and do not support existing or future mineral extraction. It is unknown whether or not any of the Related Project sites contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral resources, it would not contribute to a potential cumulative impact.

As such, the Project’s contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.

4.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section is based on the following item, which is included as **Appendix G** to this MND:

G Noise Technical Modeling, DKA Planning, January 2026.

Impact Analysis

- a) **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant with Mitigation Incorporated.

The Town of Mammoth Lakes governs noise in the Noise Element and Community Design Element of the General Plan. Goal C.6 in the 2007 General Plan’s Community Design Element includes a number of policies and actions that advance noise-related objectives, including:

- Policy C.6.A. Minimize community exposure to noise by ensuring compatible land uses around noise sources.
- Policy C.6.B. Allow development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worst-case noise levels, either existing or future, with future noise levels to be predicated based on projected 2025 levels.

- Policy C.6.C. Development of noise-sensitive land uses shall not be permitted in areas where the noise level from existing stationary noise sources exceeds the noise level standards described in the Noise Element.
- Policy C.6.D. Require development to mitigate exterior noise to “normally acceptable” levels in outdoor areas.
 - Action C.6.D.1. Assess existing sources of outdoor noise and develop criteria and standards for outdoor noise.
- Policy C.6.E. Address noise issues through the planning and permitting process.
- Policy C.6.F. Require mitigation of all significant noise impacts as a condition of project approval.
- Policy C.6.G. Require preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all proposed projects that may result in potentially significant noise impacts.
 - Action C.6.G.1. Adopt significance thresholds to be used to assess noise impacts for projects reviewed under the CEQA process, and develop a list of acceptable mitigations that might be applied to mitigate noise impacts to acceptable levels, including specific guidelines for their implementation.
 - Action C.6.G.2. Adopt criteria and location maps that specify the locations and circumstances under which a noise analysis or acoustical study will need to be prepared for a proposed project. Develop guidelines for conducting such studies.

The Noise Element, adopted June 18, 1997, includes three goals relevant for development projects:

1. To protect the citizens of the Town from the harmful and annoying effects of exposure to excessive noise.
2. To protect the economic base of the Town by preventing incompatible land uses from encroaching upon existing or planned noise-producing uses.
3. To preserve the tranquility of residential areas by preventing noise-producing uses from encroaching upon existing or planned noise-sensitive uses.

The Noise Element includes to policies relevant for development projects:

- Policy 4.2.1. New development of noise-sensitive land uses shall not be permitted in areas exposed to existing or projected future levels of noise from transportation noise sources which exceed 60 dB L_{dn} in outdoor activity areas of 45 dB L_{dn} in interior spaces.
- Policy 4.2.3. New development of noise-sensitive land uses shall not be permitted where the noise level from existing stationary noise sources exceeds the noise level standards of Table VII.

The Element also includes several Implementation Measures relevant for development proposals:

5.1 The Town shall review new public and private development proposals to determine conformance with the policies of this Noise Element.

5.2 The Town shall require an acoustical analysis in those cases where a project potentially threatens to exposure noise-sensitive land uses to excessive noise levels. The presumption of excessive noise levels shall be based on the location of new noise-sensitive uses to known noise sources, or staff's professional judgement that a potential for adverse noise impacts exists. Acoustical analyses shall be required early in the review process so that noise mitigation may be included in the project design. For development not subject to environmental review, the requirements for an acoustical analysis shall be implemented prior to the issuance of building permits. The requirements for the content of an acoustical analysis are given in Appendix B.

5.5 The Town shall enforce the State Noise insulation Standards (California Code of Regulations, Title 24) and Chapter 35 of the Uniform Building Code (UBC) concerning interior noise exposure for multi-family housing, hotels and motels.

In addition, the Town enforces noise limits in Municipal Code Section 8.16 (Noise Regulation), which includes exterior noise limits that are based on land uses (Table 4.13-1)

**Table 4.13-1
Mammoth Lakes Exterior Noise Limits**

Receiving Land Use Category	Time Period	Rural/Suburban	Suburban	Urban
One and Two Family Residential	10 P.M.-7 A.M.	40	45	50
	7 A.M.-10 P.M.	50	55	60
Multi-Family Dwelling Residential	10 P.M.-7 A.M.	45	50	55
	7 A.M.-10 P.M.	50	55	60
Limited Commercial Some Multiple Dwellings	10 P.M.-7 A.M.	55		
	7 A.M.-10 P.M.	60		
Commercial	10 P.M.-7 A.M.	60		
	7 A.M.-10 P.M.	65		
Light Industrial	Anytime	70		
Heavy Industrial	Anytime	75		

Source: Town of Mammoth Lakes,

Section 8.16.070(B) of the Municipal Code states that “[n]o person shall operate or cause to be operated any source of sound at any location within the town or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measured on any other property to exceed:

1. The noise standard for that land use as in Table 1 for a cumulative period of more than thirty minutes in any hour; or
2. The noise standard plus five dB for a cumulative period of more than fifteen minutes in any hour; or

3. The noise standard plus ten dB for a cumulative period of more than five minutes in any hour; or
4. The noise standard plus fifteen dB for a cumulative period of more than one minute in any hour; or
5. The noise standard plus twenty dB of the maximum measured ambient level, for any period of time.

The Municipal Code also includes standards governing construction and other types of activities relevant for development projects, including:

- Section 8.16.090(5). Loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of ten p.m. and seven a.m. in such a manner as to cause a noise disturbance across a residential real property line or at any time to violate the provisions of this section.
- Section 8.16.090(). Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work is subject to the hours of work permitted by this code, except for emergency work of public service agencies...

Table 4.13-2

Mammoth Lakes Maximum Noise Levels for Short-Term Mobile Equipment Noise

Acceptable Hours Operation	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Semi- Residential Commercial
Daily, except Sundays and legal holidays 7 A.M. to 8 P.M.	75 dBA	80 dBA	85 dBA
Daily, 8 P.M. to 7 A.M. and all day Sundays and legal holidays	60 dBA	65 dBA	70 dBA
Source: Town of Mammoth Lakes, Municipal Code.			

Table 4.13-3

Mammoth Lakes Maximum Noise Levels for Long-Term Mobile Equipment Noise

Acceptable Hours Operation	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Semi- Residential Commercial
Daily, except Sundays and legal holidays 7 A.M. to 8 P.M.	60 dBA	65 dBA	70 dBA
Daily, 8 P.M. to 7 A.M. and all day Sundays and legal holidays	50 dBA	55 dBA	60 dBA
Source: Town of Mammoth Lakes, Municipal Code.			

Existing Noise Environment

In September 2025, DKA Planning took short-term noise measurements near the Project site to establish the ambient noise conditions of the neighborhood near sensitive receptors.⁴⁵ As shown in Table 4.13-4, noise levels along roadways near the Project Site ranged from 42.5 to 61.6 dBA L_{eq} , which was generally consistent with their exposure to traffic volumes on local roads like Obsidian Place to Meridian Boulevard, respectively. Figure 1, below, illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-hour CNEL noise levels are generally considered “Normally Acceptable” for the types of land uses near the Project Site, as defined by the State’s 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use.⁴⁶

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. Noise-sensitive receptors around the Project Site include, but are not limited to, the following representative sampling:

- Residences – 384 Joaquin Road. This and other residences are as close as five feet north of the Project Site.
- Residences – 543 Joaquin Road. This and other residences are as close as 60 feet east of the Project Site across Joaquin Road.
- Residences – Obsidian Place. These residences are as close as five feet west of the Project Site.
- Residences – Starwood Circle. These multi-family residences are approximately 250 feet south of the Project Site and across Meridian Boulevard.

⁴⁵ Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day’s measurements, and set at approximately five feet above the ground.

⁴⁶ California Office of Planning and Research “General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.



**Table 4.13-4
Existing Noise Levels**

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility ^b
		dBA (L _{eq})	dBA (CNEL) ^a		
A. 384 Joaquin Rd.	Traffic on Joaquin Rd.	50.4	48.4	Residences – 384 Joaquin Rd.	Normally Acceptable
B. 543 Joaquin Rd.	Traffic on Meridian Bl.	60.3	58.3	Residences – 543 Joaquin Rd.	Normally Acceptable
C. 526 Obsidian Pl.	Traffic on Obsidian Pl.	42.5	40.5	Residences – Obsidian Pl.	Normally Acceptable
D. Meridian Bl near Minaret Rd.	Traffic on Meridian Bl.	61.6	59.6	Residences – 101 Starwood Cir.	Normally Acceptable

^a Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.
^b Pursuant to California Office of Planning and Research “General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 above for definition of compatibility designations.

Source: DKA Planning, 2025

Construction Noise

The roughly 39-month construction phase would include activities to clear the Project Site, including demolition of the residence and other associated improvements, followed by site preparation that includes the clearing of landscaping and several dozen Pine trees. Debris during these phases would be collected and hauled to an off-site landfill in Lee Vining using public roads. This would be followed by cut and fill activities to grade the site, with 1,000 cubic yards of soil being imported to prepare the site for improvements. The paving of access driveways from Meridian Boulevard and Joaquin Road and the new bike path would set the stage for construction of the residential structures.

Noise levels would generally peak during the site preparation and grading phases, when diesel-fueled heavy-duty equipment (e.g., excavators, dozers) are needed to move trees and large amounts of dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated. Mobile equipment often operates away from off-site receptors, continuously moving around.

During other phases of construction (e.g., building construction, paving, architectural coatings), noise impacts are generally lesser because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment (e.g., forklifts, generators, powered hand tools, pneumatic equipment) is generally utilized. Impact devices such as pile driving and jack hammers are not necessary. Off-site secondary noises will be generated by construction worker vehicles, vendor deliveries, and haul trucks.

The Town is the local agency responsible for adopting and implementing policies as they relate to noise levels and its effect on land uses within its jurisdiction. Both acceptable and unacceptable noise levels associated with construction activities and exterior noise levels at various land use zones have been defined and quantified. Municipal Code Chapter 8.16 (Noise Regulations) controls unnecessary, excessive, and annoying noise in the Town. The regulations set forth sound measurement and criteria, maximum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance to the peace, and legal remedies for violations.

According to Municipal Code Section 15.08.020, construction activities are permitted between the hours of 7 A.M. and 8 P.M., Monday through Saturday. Work hours on Sundays and Town recognized holidays are limited to the hours between 9 A.M. and 5 P.M., and are permitted only with the approval of the building official or designee. The Town has established noise standards for construction activity in Municipal Code Section 8.16.090 (Prohibited Acts). The Town has established maximum exterior noise levels during permitted work hours from the operation of equipment used in construction, drilling, repair, alteration, or demolition work. All mobile and stationary internal-combustion powered equipment and machinery are also required to be equipped with suitable exhaust and air-intake silencers in proper working order.

The Project would be required to comply with the provisions of the Municipal Code and Noise Regulations. Construction best management practices (BMPs) would to be implemented by

contractors to reduce construction noise levels. Project developers shall require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels. These include:

- Provide advance notification of construction to the immediate surrounding land uses around a development site
- Ensure that construction equipment is properly muffled according to industry standards
- Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible
- Schedule high noise-producing activities between the hours of 8 A.M. and 5 P.M. to minimize disruption on sensitive uses
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets

The Project would result in a potentially significant noise impact if mobile equipment used in construction activities result in short-term noise exposures at surrounding noise sensitive land uses in excess of 80 dBA that are contained in Chapter 8.16-Noise Regulation of the Town of Mammoth Lakes Municipal Code.

As shown in Table 4.13-5, construction equipment often generates over 80 dBA L_{max} of noise at 50 feet of distance. The simultaneous operation of multiple pieces of equipment on the 3.24-acre site could result in short-term noise levels at nearby sensitive land uses of over 80 dBA. Specifically, this could produce maximum noise levels of 85-90 dBA L_{max} at a reference distance of 50 feet. These impacts could also result in short-term noise levels that exceed those established in Chapter 8.16 governing noise. This impact would be considered significant but mitigable. Actual impacts will depend on the location of equipment in relation to nearby residences, though the mobile nature of construction equipment results in variable impacts throughout each day of construction.

**Table 4.13-5
Maximum Construction Noise Levels**

Noise Source	Noise Level (dBA, L _{max}) ¹
	Reference
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Crane	83
Dozer	85
Grader	85
Front End Loader	80
Generator	82
Grader	85
Jack Hammer	88
Loader	80
Paver	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
¹ Federal Transit Administration Noise and Vibration Manual, 2018.	

The Project would also generate noise at off-site locations from haul trucks moving debris, landscaping, and soil to and/or from the Project Site during demolition, site preparation, and grading activities, respectively; vendor trips; and worker commute trips. However, these impacts from vehicles would be intermittent and focused along Meridian Boulevard, as haul trucks access a landfill in Lee Vining via SR-395 or along either Minaret Road and Mammoth Scenic Loop. The relative absence of sensitive receptors along these haul routes would further reduce exposure of sensitive receptors to noise levels that exceed municipal standards.

Mitigation Measure

MM-NOI-1 Best Management Practices During Project Construction

The Project developer shall require by contract specifications that the following construction best management practices be implemented by contractors to reduce construction noise levels:

- a. Provide advance notification of construction to the immediate surrounding land uses around a development site.
- b. Ensure that construction equipment is properly muffled according to industry standards.

- c. Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible.
- d. Locate construction staging area as far away from residences, where feasible.
- e. Schedule high noise-producing activities between the hours of 8 a.m. and 5 p.m. to minimize disruption on sensitive uses.
- f. Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers and/or noise blankets along the western, north, and eastern perimeters of the Project Site.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-NOI-1 would substantially reduce noise exposure at nearby sensitive receptors and result in impacts that are less than significant with mitigation incorporated in two key ways. First, Mitigation Measure MM-NOI-1 would reduce the sound power of construction activities as well as the noise exposure from such activities at nearby sensitive receptors by maximizing the buffer between construction activities and nearby residences. Relocating a noise source from 5 feet to 20 feet from a residence (two distance doublings) could reduce noise levels by approximately 6 to 10 dBA.

Second, placement of temporary sound barriers between construction activities and adjacent residences is one of the most effective BMPs for reducing construction noise. Sound barriers reduce noise by blocking the direct line-of-sight between the noise source and the receptor, forcing sound waves to diffract over the barrier and reducing sound energy reaching the receptor. Temporary sound barriers constructed of plywood, sound-attenuating blankets, or modular noise panels can typically achieve noise reductions of approximately 5 to 15 dBA, depending on barrier height, length, material, and placement.

Additional BMPs, such as maintaining equipment mufflers, limiting unnecessary idling, and avoiding concurrent operation of multiple high-noise equipment items near residences, would further reduce average and peak noise levels.

When equipment siting, construction staging, and temporary sound barriers are implemented together, their effects are additive. For example, distance attenuation (6–10 dBA) combined with sound barriers (5–15 dBA) could yield a total noise reduction of approximately 10 to 20 dBA. An unmitigated noise level of 90 dBA at very close proximity could therefore be reduced to approximately 70 to 80 dBA, meeting or falling below the Town of Mammoth Lakes 80 dBA construction noise threshold. As such, this impact would be less than significant.

Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structures themselves or from activity in outdoor spaces. The Town has established exterior noise standards for land uses. As indicated in the Noise Regulations, noise levels at each land use may not exceed the exterior noise standard plus 20 dBA for any period of time (maximum noise level) (Municipal Code Section 8.16.070.B.5). As such, the maximum noise level that is allowed for any period of time for one and two-family residential uses would be 60 dBA Ldn (40 dBA + 20).

The Project would result in a significant noise impact if operational activities result in long-term operational noise that creates noise exposures in excess of 80 dBA at the adjoining property line of a noise sensitive land use and the background noise level is increased by 10 dBA, or more,

The Project would include outdoor mechanical equipment for heating and cooling for each residence, likely on the ground level.⁴⁷ This could include ground-mounted heat pumps that would generate noise during both heating and cooling sessions while air conditioners operate during cooling cycles.⁴⁸ This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans. These units could be rated to generate a sound power between 51 and 76 dBA. Any off-site sensitive receptors would not experience elevated noise levels without a direct line-of-sight to these units. Given their location near each residence, any sound path from these units would likely be attenuated by the presence of the residences and structures in the development, as well as the distance to off-site receptors. As a result, noise from HVAC units would negligibly impact ambient noise levels, far below the 80 dBA threshold.

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could generate approximately 278 vehicle trips to local roadways and the region's air quality airshed on an average weekday at the start of operations in 2029.⁴⁹ During the peak P.M. hour, up to 26 vehicles would generate noise in and out of the development, with up to 24 vehicles in the peak A.M. hour. This would represent an average of one vehicle every two minutes traveling to or from the development in the peak traffic hour.

Achieving 80 dBA at nearby residences would require an unusually loud and sustained source or extremely close proximity; passenger-vehicle trips at local-street speeds, particularly when limited to 26 vehicles and dispersed over time, would not generate 80 dBA at residential receptors. Using a standard logarithmic traffic-noise relationship, adding up to 26 vehicles to a local street with typical existing volumes (e.g., 100–200 vehicles/hour) would increase average traffic noise by approximately 0.5 to 1.0 dB, which is not substantial and is generally below the threshold of audibility. Therefore, Project-related vehicle access would not substantially elevate ambient noise levels on local streets and would not produce 80 dBA at nearby residences. Operational noise impacts would be considered less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Existing Vibration Environment

In 2018, the Federal Transit Administration (FTA) published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically,

⁴⁷ HVAC equipment located on the roof of townhomes 37'1" above grade would reduce noise exposure for sensitive receptors, as the line of sight would be blocked by the roof parapets and/or roof edge.

⁴⁸ Given the Project Site's location in Climate Zone 9, Title 24 would also allow a more conventional gas heating system that uses an internal furnace paired with an external air conditioner that would be ground-mounted.

⁴⁹ CalEEMod 2022.1.1.35 model analysis.

potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table 4.13-6 summarizes FTA’s vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

**Table 4.13-6
FTA Vibration Damage Potential Threshold Criteria**

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA “Transit Noise and Vibration Impact Assessment Manual”, September 2018.	

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

The primary source of groundborne vibration near the Project Site is vehicle travel. However, the blend of passenger vehicles, trucks, delivery trucks, transit buses, and other light-, medium-, and heavy-duty vehicles generate minimal levels of vibration on these and other local roads. As noted by federal guidance, “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible...”⁵⁰ As such, vehicle movement generates imperceptible ground vibration, with the occasional exception of heavy-duty vehicles that travel over speed bumps, potholes, and other street irregularities.

There are several buildings near the Project Site that could be exposed to groundborne vibration during construction and operation of the proposed development that include:

- Residences – 384 Joaquin Road. This and other residences are as close as five feet north of the Project Site.
- Residences – 543 Joaquin Road. This and other residences are as close as 60 feet east of the Project Site across Joaquin Road.
- Residences – Obsidian Place. These residences are as close as five feet west of the Project Site.
- Residences – Starwood Circle. These multi-family residences are approximately 250 feet south of the Project Site and across Meridian Boulevard.

⁵⁰ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

On-Site Construction Vibration Impacts

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable state, County, or City standards specific to temporary construction activities. Heavy construction equipment (e.g. a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source.

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table 4.13-7 summarizes vibratory levels for common construction equipment.

**Table 4.13-7
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

Groundborne vibration would be generated by a number of construction activities at the Project site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.191 inches per second PPV are projected to occur at the nearest structures (Table 4.13-8). These impacts are below the 0.2 in/sec PPV thresholds of significance for Category III structures, such as the residences in the immediate vicinity of the Project Site. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be considered less than significant.

**Table 4.13-8
Building Damage Vibration Levels – On-Site Sources**

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Residences – Obsidian Pl.	15	0.191	0.191	0.164	0.075	0.006	0.20 ^a	No

Residence – 384 Joaquin Rd.	15	0.191	0.191	0.164	0.075	0.006	0.20 ^a	No
Residence – 543 Joaquin Rd.,	70	0.032	0.032	0.027	0.013	0.001	0.20 ^a	No
^a FTA criterion for Category III (non-engineered timber and masonry buildings). Assumes 10-foot buffer on Project Site for vehicle maneuverability.								
Source: DKA Planning, 2025.								

Off-Site Construction Vibration Impacts

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.⁵¹ According to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.”

Operational Groundborne Vibration

The Project’s day-to-day operations would include typical residential stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the driveway/parking area.

During operation of, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site’s vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project’s long-term vibration impacts would be less than significant.

Conclusion

Based on the above, groundborne vibration and groundborne noise impacts associated with the Project would be less than significant, and no mitigation is required.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact.

⁵¹ Federal Transit Administration, “Transit Noise and Vibration Impact Assessment,” May 2006, Figure 7-3.

There are no nearby airports or private airstrips. Mammoth Yosemite Airport is located approximately 6 miles to the southeast. Given the distance between the Project Site and the listed airport, the Project will not have the potential to create excessive noise. The Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

The Project, together with the Related Projects and future growth, could contribute to cumulative noise and vibration impacts. The potential for cumulative noise and vibration impacts to occur is specific to the distance between each Related Project and their stationary noise sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

4.14 Population and Housing

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	--	------------------------------	-----------

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

- a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact.

The Town adopted a Housing Element in August 2019. The Housing Element establishes the Town’s policy relative to the maintenance and development of safe, decent, and affordable1 housing to meet the needs of existing and future residents. It addresses the planning period 2019-2027, and meets the two purposes identified by State law, including assessment of current and future housing needs and constraints in meeting those needs; and providing a strategy that establishes housing goals, policies and programs.⁵² The State Department of Housing and Community Development provided the Regional Housing Need Allocation (RHNA) for Mono County and Mammoth Lakes; the county’s only incorporated community. The RHNA is 155 units for the period December 31, 2018 to August 15, 2027.

The Site is identified in the Housing Element as land inventory for housing and that infrastructure is available.

According to data from the American Community Survey (2016), the average household size in the Town is 2.77. With the development of 38 units, the population could increase by approximately 106 persons.

⁵² Mammoth Lakes, Housing Element, 2019: <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/9756/Adopted-Mammoth-Lakes-2019-2027-HE>

The Project will be consistent with the population and housing projections of the Housing Element. Mammoth Lakes could grow by its RHNA of 155 units, or 388 people. Therefore, the Project's residents fit well within projections for the Town.

As emphasized in regional and local planning documents, including the Housing Element, the Town is in need of new dwelling units to serve both the current population and the projected population.

Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact.

The Project Site currently contains one housing unit, and the Project will add 38 housing units, or a net increase of 37 units. The Project will not conflict with the Housing Element, which requires that the Town show it has adequate land zoned to accommodate the RHNA allocation of housing units for 2019-2027. Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area. By developing new residential dwelling units, the Project will help to fulfill this demand.

Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Related Projects are residential projects. These projects are located within an urbanized area well-served by infrastructure and public services, and do not require the extension of new infrastructure that could induce unplanned growth. As such, the Project would not directly or indirectly contribute to significant cumulative impacts associated with population and housing, and cumulative impacts would be less than significant.

4.15 Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) Fire Protection?

Less Than Significant Impact.

The Mammoth Lakes Fire Protection District (MLFD) is an all-risk fire department headquartered in the Town. The MLFD has eight full-time and 45 part-time fire fighters. Daily staff is one on-duty Chief and one 3-person engine company. For larger emergencies or multiple incidents, the on-duty staff can be supplemented by calling in part-time personnel. MLFD is considered an all-risk department, and as such, responds to a wide variety of incidents including: structure fires, wildland fires, ice and water rescues, hazardous materials incidents, medical emergencies and motor vehicle accidents. See **Table 4.15-1** for the Fire Stations.

Mammoth Lakes is a Wildland-Urban Interface community and is at a higher risk for wildfire. Residents conduct defensible space self-assessments throughout the year.

Municipal Code Section 15.16.080 Article II, (Development Impact Mitigation Fees) establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.082.H, establishes a development impact fee (DIF) program to fund fire facilities, vehicles, and equipment.

**Table 4.15-1
Fire Stations**

Station	Address	Equipment	Distance to Site
1	3150 Main Street	2 Type 1 Engines Type III Engine 100' Aerial Platform 3000 gal Water Tender	3,300 feet northeast

**Table 4.15-1
Fire Stations**

Station	Address	Equipment	Distance to Site
		BLS Ambulance	
2	1574 Old Mammoth Road	2 Type 1 Engines 75' Quint	3,850 feet south
Mammoth Lake, Emergency Operations Plan, 2017. Mammoth Lakes Fire Protection District, https://mffd.ca.gov/			

Construction

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As construction activities are temporary in nature and emergency vehicles have a variety of options for dealing with traffic, construction of the Project will not impact fire services to the extent that there will be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives during construction of the Project.

Operation

MLFD requires a fire hydrant along the streets of Mammoth Lakes. In addition, the MLFD also requires that new construction meet the National Fire Protection Association (NFPA) requirements for fire protection flows. In conjunction with the Mammoth Community Water District, MLFD has been able to adequately meet these requirements.

A new internal access road would be created for the Project Site. The internal roadway would be privately owned and maintained, and would provide residential and emergency access. Emergency vehicles would circulate through the Project area using the internal roadway. Fire lanes, turning radii and back up space around the buildings would be designed in cooperation with local officials so as to be adequate for emergency and fire equipment vehicles. Pavements would be designed to support loads created by emergency vehicle traffic. Standpipe and fire suppression systems connections would be incorporated into architectural and landscaping design elements where practical and in location accessible to fire equipment.

The Project would incorporate a number of fire safety features in accordance with applicable MLFD fire-safety code and Town regulations for construction, access, fire flows, and fire hydrants. These fire safety features include, but are not limited to, ample roads, adequate building spacing, use of fire resistive building materials, and adequate vegetative clearance around structures. Considering that the Project Site is undeveloped and that current use of the site is limited to open space the Project would represent a more intense use of the site.

Although the relationship is not directly proportional, more intense uses of land typically result in the increased potential for fire and emergency incidents. Thus, the Project would create an increased demand for fire protection services. However, according to the MLFD, with the mutual-aid agreement with neighboring fire districts, their current staffing, and equipment, facility levels

are adequate to accommodate the Project's demand for fire protection services. In addition, the MLFD is a participant in the Town's Emergency Operations Plan (EOP) which includes the Project area. The Plan would be revised with the development of the Project to include any needed updates or changes.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the Town will comply with that provision to ensure that public safety services are provided.⁵³

Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Related Projects and other future development projects in the area would be reviewed by the MLFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each Related Project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, Related Projects, and other future development projects would be subject to the standard construction permitting process, which includes a review by MLFD for compliance with building and site design standards related to fire/life safety, as well as coordinating to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As with the Project, the Related Projects and other future development projects in the vicinity would also generate revenues to the General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.

Cumulative increases in demand for fire protection services due to Related Projects and other future development projects would be identified and addressed through the annual programming and budgeting processes. resource needs would be identified, and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts

⁵³ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

of which would be addressed accordingly. Furthermore, over time, MLFD would continue to monitor population growth and land development throughout the Town and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

Thus, compliance with the Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

b) Police Protection?

Less Than Significant Impact.

The Town of Mammoth Lakes Police Department (MLPD), located at 58 Thompson Way, provides police services to the Project Site and surrounding area. The MLPD is responsible for providing public safety services in the town including patrol, investigations, custody of adult offenders, wildlife management, and narcotic enforcements.

The Mono County Sheriff's Department and the California Highway Patrol also provide police protection and law enforcement in the Town of Mammoth Lakes (Town) and surrounding community.

The MLPD staff is comprised of 11 full time sworn officers, four part time sworn reserve officers, three full time civilian staff, and one contracted full time employee. The MLPD currently owns 10 black and white vehicles, one non-emergency police services vehicle and three unmarked police vehicles. MLPD remains the only agency within Mono County that provides 24 hour patrol coverage. The existing level of service for the MLPD is approximately one officer per 1,000 residents.

Municipal Code Section 15.16.080 Article II, (Development Impact Mitigation Fees) establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.082.B, establishes a development impact fee (DIF) program to fund policies facilities, vehicles and equipment.

Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open around its boundaries. The boundaries will need to be secured during construction. The Project applicant will employ construction security features, such as fencing, which will serve to minimize the need for police services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local level and to keep unpermitted persons from entering

the construction area. These security measures will ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts will be less than significant.

Operation

According to data from the American Community Survey (2016), the average household size in the Town is 2.77. With the development of 38 units, the population could increase by approximately 106 persons. To maintain the same officer ratio, the Project would require less than 1/10 of 1 officer.

The additional number of people and activity on the Project Site could result in an increase in the need for police services. The crime rate, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the MLPD. To some extent, it is logical to anticipate that the crime rate in a given area would increase as the level of activity or population increase, along with an increase in opportunities for crime. However, because a number of other factors also contribute to the resultant crime rate, such as police presence, crime prevention measures, and on-going legislation/funding, the potential for increased crime rates is not necessarily directly proportional to increases in land use activity.

While the Project would increase the number of persons and level of activity on the Project Site, given the type of use, it is reasonable to expect that the Project would not result in a meaningful increase in the amount of crime in the Project area. Additionally, although additional police equipment and staff would be necessary to accommodate the Project, the additional demand for police services created by the Project would not require the need for new or altered police facilities other than those currently planned for future police staffing and facilities. Therefore, Project impacts on police services would be less than significant.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the Town will comply with that provision to ensure that public safety services are provided.⁵⁴

Thus, impacts with regard to police protection services and facilities would be less than significant.

⁵⁴ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

Cumulative Impacts

Less Than Significant Impact.

Through the regular budgeting efforts, resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

c) Schools?

Less Than Significant Impact.

Public education services within the Town are provided by the Mammoth Unified School District (MUSD). The MUSD has a current enrollment of 1,200 K-12 students, and is comprised of four schools. See **Table 4.15-2** for the schools.

Table 4.15-2
Schools

Name	Address	Grades	Enrollment
Mammoth Elementary	2600 Meridian Boulevard	K-5	534 students
Mammoth Middle	1600 Meridian Boulevard	6-8	295 students
Mammoth High	365 Sierra Park Road	9-12	349 students
Sierra Continuation High	1601 Meridian Boulevard	11-12	8 students
https://www.mammothusd.org/apps/pages/index.jsp?uREC_ID=339237&type=d&pREC_ID=746162			

As shown on **Table 4.15-3**, the Project (directly through the residential use) will generate an increase of approximately 11 students. To be conservative, this analysis assumed that all students generated by the Project will be new to MUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table 4.15-3
Project Estimated Student Generation

Source	Quantity	Students Generated
Residential	38 units	11
<p>The generation factor is from the Mammoth Unified School District, Level I Developer Fee Study, May 1, 2020.</p> <p>To identify the number of students anticipated to be generated from new residential development, a student yield factor of 0.287 has been utilized for the Mammoth Unified School District. The student generation rate of 0.287 is 41% of the Office of Public School Construction's State wide average of 0.7. The State wide average, 0.7, for a unified district is based on the number of students generated from homes in communities in which the majority of homes are occupied by full-time residents. According to the Town of Mammoth Lakes Planning Department, the Mammoth area is a resort community in which 59% of homes are vacation homes, while an estimated 41% are occupied by full-time residents. Therefore, a student generation rate of 0.287 (0.41 x 0.7) was utilized to calculate Level I fees.</p> <p>Table: CAJA Environmental Services, September 2025.</p>		

The state has a mechanism in place to collect funding needed to improve schools. Any future development that occurs as a result of the plan and implementing ordinances will be subject to California Education Code Section 17620(a)(1), which states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. Additionally, future projects will be subject to the Leroy F. Greene School Facilities Act of 1998 (SB 50), which sets a maximum level of fees a developer may be required to pay to reduce a project's impacts on school facilities. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws (Government Code Section 65996).

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The MUSD's Level I Developer Fee Study has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, MUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 will be mandatory and provide full and complete mitigation of school impacts for the purposes of CEQA.

Cumulative Impacts

Less Than Significant Impact.

As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the Related Projects would be required to pay school fees, which would fully mitigate any potential impacts to school facilities.

Therefore, cumulative impacts associated with schools would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

d) Parks?

Less Than Significant Impact.

The Mammoth Lakes Parks and Recreation Department (MLPRD) manages and maintains the Mammoth Ice Rink, Whitmore Track & Sports Field, Community Center Tennis Courts, Mammoth Creek Park, Shady Rest Park, the Volcom Brothers Skate Park and the Whitmore Recreation Area, including the Whitmore Pool. Town Administration oversees the Council Chambers / Suite Z, located in the Minaret Village Shopping Center. See **Table 4.15-4** for the parks.

**Table 4.15-4
Parks**

Name	Address	Description
Mammoth Ice Rink	416 Sierra Park Road	Public skating sessions, skate improvement programs, expanded adult and youth hockey programs, Friday Night 1st TimerSkate Assist, and curling
Whitmore Track & Sports Field Whitmore Ball Fields Whitmore Pool	575 Benton Crossing Road	Running track, with a full-size synthetic turf infield striped for soccer or football baseball diamond, two softball fields six-lane 25-meter pool, children's wading pool
Shady Rest Park	Sawmill Cutoff	Playground equipment, a sheltered picnic area, restrooms, picnic tables, sand volleyball courts, softball fields, soccer fields, a concession stand, a parking area and a small "street scene" skate-park
Mammoth Creek Park	437 Old Mammoth Road	play area designed for toddlers and school-age children, restrooms, parking, picnic tables, and access to Mammoth Creek
Trails End Park	1390 Meridian Boulevard	Volcom Brothers Skateboard Park
Community Center Park	1000 Forest Trail	six tennis courts, play and picnic areas
https://www.ci.mammoth-lakes.ca.us/322/Parks-Facilities-Trails Parks and Recreation Master Plan, adopted February 1, 2012: https://www.townofmammothlakes.ca.gov/DocumentCenter/View/5567/Final-_TOML_Parks_Rec_Master_Plan_Adopted-2-1-12X?bidId=		

Nearby resources include the Sierra Star golf course, recreational trails and walkways, the golf course lake, individual pools, spas, and water play areas associated with resort hotels.

Municipal Code Section 15.16.080 Article II, (Development Impact Mitigation Fees) establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.082.D, establishes a development impact fee (DIF) program to fund park land, parks, and recreation facilities.

The payment of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the Project's demand for parks and recreational services and to offset the recreational facilities and maintenance. No additional parks or recreational facilities would be required. Therefore, Project impacts to park services would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Each of the Related Projects would be subject to payment of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the demand for parks and recreational services and to offset the recreational facilities and maintenance. Therefore, no cumulative impact would occur, and the Project's contributions to cumulative impacts would not be cumulatively considerable.

e) Other Public Facilities?**Less Than Significant Impact.****Snow Removal**

Snow removal is provided by Caltrans for State Highway 203 (Minaret Road and Main Street) from the junction of State Highway 395 to the Mammoth Mountain Inn. The Town Public Works Department provides snow removal service for all other publicly maintained roads. Roads and paved surfaces on private property are the responsibility of the landowner. The Town considers current snow removal activities adequate to meet existing needs.

Development of the Project will result in increased amounts of snow removal due to new access roads to and from the project. There is presently enough land area within the Project Site to accommodate necessary snow storage for public streets and private developments.

All designated snow storage areas must be at least 10 feet in any direction, be located near the sides or rear of parking areas and driveways, readily accessible and substantially free and clear of all obstructions, as well as meet all other requirements outlined in Municipal Code Section 17.36.110. Roadway maintenance and snow removal on private roads and private property is the responsibility of the land owners.

The snow storage area is required to cover 75% of the pavement area. The pavement area is 31,030 square feet, which results in a snow storage area of 23,273 square feet. The Project would provide 23,460 square feet of snow storage (or 76%), which exceeds the required amount.⁵⁵

Libraries

Library services in the Town are provided by the Mono County Library System (MCLS). The MCLS is operated by the Mono County Office of Education (MCOE).⁵⁶ The MCLS receives the majority of its funding from a property tax allocation, which is collected by Mono County. The Mammoth Lakes Library Branch, which is located at 400 Sierra Park Road, is approximately 17,000 square feet in size. The Mammoth Lakes Library was constructed in 2007 and was a substantial expansion from the previous library facility, which was approximately 7,000 square feet.⁵⁷

Municipal Code Section 15.16.080 Article II, (Development Impact Mitigation Fees) establishes and imposes impact fees for development within the Town to finance the cost of public facilities and improvements required by new development. Section 15.16.082.G, establishes a development impact fee (DIF) program for library facilities in the Town. The Town collects the library DIF on behalf of Mono County Office of Education.

The Project will not directly necessitate the need for a new library facility. This is because the MCLS has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. It is

⁵⁵ Plans, Stanley Saitowitz / Natoma Architects, July 29, 2025.

⁵⁶ Mammoth Lakes Library Branch: <https://www.monocolibraries.org/branches/mammoth-lakes>

⁵⁷ Mammoth Lakes, general Plan Update EIR, 2016: https://www.townofmammothlakes.ca.gov/DocumentCenter/View/6105/410_Public-Services

likely that the residents of the Project will have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations^{58,59}

For all of these reasons, it is not anticipated that the Project will result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Each of the Related Projects would be subject to payment of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the demand for parks and recreational services and to offset the recreational facilities and maintenance. Therefore, no cumulative impact would occur, and the Project's contributions to cumulative impacts would not be cumulatively considerable.

⁵⁸ "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": <http://www.nea.gov/research/toread.pdf>.

⁵⁹ "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

4.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

Less Than Significant Impact.

The Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated.

Based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, Project impacts to park services would be less than significant.

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

Less Than Significant Impact.

The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities and existing parks in the Project vicinity, as discussed above.

The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment.

The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, Project impacts to park services would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Each of the Related Projects would be subject to payment of Developer Impact Fees that support the Town's park and recreation fund would be adequate to accommodate the demand for parks and recreational services and to offset the recreational facilities and maintenance. Therefore, no cumulative impact would occur, and the Project's contributions to cumulative impacts would not be cumulatively considerable.

4.17 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

Less Than Significant Impact.

The Project would not impede development of Town-wide pedestrian network improvements.

The Project would not impede development of Town-wide bicycle network improvements. The Project would maintain the bike path that extends from the southern to northern portion of the Site, along Joaquin Road.

The Project would not impede development of Town-wide transit network improvements such as the trolley stop on Meridian Boulevard.

The Project would not conflict with adopted policies, plans, or programs supporting alternative transportation and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Similar to the Project, the Related Projects would be individually responsible for complying with relevant plans, programs, ordinances, and policies. Therefore, the Project, together with the

Related Projects would not create inconsistencies with respect to the identified programs, plans, policies, and ordinances addressing the circulation system and cumulative impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant.

SB 743, made effective in January 2014, required the Governor’s Office of Planning and Research to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay (level of service [LOS]) to VMT, with the intent of reducing greenhouse gas emissions (GHG), creating multimodal networks, and promoting mixed-use developments.

The Town adopted a VMT threshold of significance for purposes of analyzing transportation impacts under CEQA at its December 2, 2020 Council Meeting.⁶⁰ As permitted by SB743, the Town is recommending screening out certain projects from needing a complete VMT analysis. The purpose of this step is to determine if a presumption of a non-significant transportation impact can be made on the facts of the project. The guidance in this section is primarily intended to avoid unnecessary analysis and findings that would be inconsistent with the intent of SB 743.

See Table 4.16-1 for the trip generation.

**Table 4.16-1
Trip Generation**

Land Use	Quantity	ITE Code	Daily Rate	Daily Trips
Residential	38 units	221	5.44 / unit	206.72
Institute of Transportation Engineers, <u>ITE Trip Generation Manual, 12th Edition.</u> #221 – Multifamily Housing (Mid-Rise) – containing three to ten floors				

A detailed CEQA transportation analysis will not be required for land use elements of a project that meet a screening criteria shown in Table 4.16-2. Two possible screening criteria were explored:

⁶⁰ Mammoth Lakes, Council Meeting, December 2, 2020, Item 10: <https://pub-townofmammothlakes.escribemeetings.com/Meeting.aspx?Id=68120742-5d1b-260b-8f64-aceacb092508&Agenda=Agenda&lang=English#>

**Table 4.16-2
Screening Criteria**

Screening Criteria	Guidance
<p>Small Projects¹ This applies to projects with low trip generation per existing CEQA exemptions. Note that this includes any land use type (residential, office, open space, neighborhood parks, etc.)</p>	<p>Presumed to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> • Project generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Town of Mammoth Lakes <p>Unless:</p> <ul style="list-style-type: none"> • It is inconsistent with the General Plan as determined by the Town of Mammoth Lakes
<p>Map-Based Screening² This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening smaller developments. Note that screening is limited to residential and employment-based-projects utilizing the maps.</p>	<p>Presumed to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> • Area of development is under threshold as shown on screening map as allowed by the Town of Mammoth Lakes. Note that screening maps for residential and employment based VMT projects are provided in Appendix B. <p>Unless:</p> <ul style="list-style-type: none"> • The project represents significant growth as to substantially change regional travel patterns as determined by the Town of Mammoth Lakes
<p>Draft SB 743 Orientation Guidelines, November 24, 2020, Exhibit 2 – Screening Criteria https://pub-townofmammothlakes.escribemeetings.com/filestream.ashx?documentid=11094 ¹ 2018 OPR Guidance, page 12 ² Map-Based Screening is appropriate for projects where the primary source of VMT is related to residential or employment-based VMT. Office of Planning and Research (OPR), <u>Technical Advisory on Evaluating Transportation Impacts in CEQA</u>, December 2018.</p>	

First, the Small Projects screening was analyzed to determine if the Project complied with the Guidance. The trip generation was calculated and determined to exceed the trip generation threshold.

Second, the Map-Based screening was analyzed to determine if the Project complied with the Guidance. The residential trip length map was reviewed and determined that the area of development is within an area that would be 15% or more below the Mono County average for residential commute trip length (home-based). Therefore, the Project, as a residential development, is screened out. The non-significant process of transportation assessment is complete.

Therefore, the Project will not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Cumulative Impacts

Less Than Significant.

As described above, the Project would not result in a significant VMT impact. Therefore, the Project is not anticipated to result in a cumulative VMT impact. Furthermore, the Project would also contribute to the productivity and use of the regional transportation system by providing

employment and housing near transit and encouraging active transportation by providing new bicycle parking infrastructure and active street frontages. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Less Than Significant Impact.

Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented during construction of the Project to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project developer will install appropriate construction related traffic signs and fencing around the Project Site to ensure pedestrian and vehicle safety. Therefore, no impacts will occur.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

Pedestrian and bicycle volumes are expected to increase to and from the Project Site. Nonetheless, the Project is designed to encourage and accommodate the increases in pedestrian and bicycle activity to and from the Project Site, though not in sufficient quantities to result in a significant conflict with the vehicles using the access points.

The Project driveway would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or vehicular-pedestrian conflicts. Based on the above, the Project does not present geometric design hazards related to mobility or pedestrian accessibility. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Thus, cumulative impacts would be less than significant.

- d) Would the project result in inadequate emergency access?**

Less Than Significant Impact.

While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities, such as traffic control and flagging, may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures.

The Project's internal circulation will be designed to meet all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. The Project also will not include the installation of barriers that could impede emergency vehicle access both during and post-construction.

Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions. As such, emergency access to the Project Site and surrounding area will be maintained both during and post-construction. Therefore, the Project will not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project will be less than significant.

Cumulative Impacts

Less Than Significant Impact.

As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the Related Project sites would be required to meet all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of fire/life safety plan review which is required prior to the issuance of a building permit. Additionally, the additional traffic generated by the Related Projects would be dispersed throughout the study area and would not be concentrated to a specific location.

Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other Related Projects that could lead to cumulative impacts is not expected. Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.

4.18 Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or**
 - ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant Impact.

PRC Section 5097.99 prohibits acquisition or possession of Native American artifacts or human remains taken from a Native American grave or cairn after January 1, 1984, except in accordance with an agreement reached with the NAHC.

PRC Section 5097.5 provides protection for tribal resources on public lands, where PRC Section 5097.5(a) states, in part, that:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

Results of the Sacred Lands File search were negative and the NAHC provided a list of Native American tribes who may have knowledge of cultural resources in the Project Site.

AB 52, which requires lead agencies to consult with tribes about potential project impacts and tribal cultural resources in the project area, applies specifically to projects for which a Notice of Preparation of an Environmental Impact Report (EIR) or a Notice of Intent to Adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. Environmental review for the Project is not expected to require preparation of an EIR, ND or MND; therefore, notification and government-to-government consultation pursuant to AB 52 and its implementing regulations have not been conducted.

The Town initiated Assembly Bill (AB) 52 Native American Consultation for the Project on January 20, 2026, by sending a notice to all tribal contacts known to be affiliated with the area. As of April 2026, no tribal contacts responded nor requested consultation. Therefore, the AB 52 Native American Consultation process has been closed for the Project.

According to the geotechnical report prepared for the Project (Included in Appendix D of this MND), the Project Site is underlain with between two to six feet of undocumented fill and topsoil, and the Project does not include the construction of any subterranean levels. Therefore, it is unlikely that any tribal cultural resources would be discovered as part of the Project. Nevertheless, should tribal cultural resources be inadvertently discovered at the Project Site, standard measures would be implemented to address the inadvertent discovery of such resources.

Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried tribal cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist should have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed.

Overall, with adherence to the standard measures regarding tribal cultural resources, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074, and potential impacts to tribal cultural resources would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, Related Projects, and other future development affected the same tribal cultural resources and communities. All Project development would occur within the boundaries of the Project Site, and as discussed above, there are no tribal cultural resources identified on the Project Site. However, in the event that tribal cultural resources are uncovered, the Project and each Related Project would be required to comply with the applicable regulatory requirements discussed above. Therefore, cumulative impacts related to tribal cultural resources would be less than significant and would not be cumulatively considerable.

4.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant Impact.

Water

Water infrastructure development requirements are determined on a site-by-site basis as determined necessary to serve the needs of the project or as otherwise required by the Mammoth Community Water District. The Town is fully served with water infrastructure. The Mammoth Community Water District (MCWD) adopted an Urban Water Management Plan (UWMP) in May

2021.⁶¹ The UWMP total water demand in 2020 is 2,024 acre-feet and projected to increase to 2,385 acre-feet in 2025, an increase of 361 acre-feet. Projections are based on the buildout of the General Plan by 2035.

MCWD also identified some deficiencies in sewer capacity during its 2005 connection fee study and several improvements/upgrades needed to the system including a new sewer trunk line along Meridian Boulevard from Old Mammoth Road to the treatment plant; increase in sewer line capacity along Center Street for Manzanita Road to Main Street; and a new relief sewer through The Parcel site. Collection of connection fees from future development would fund these improvements and ensure that they would not prove to be a constraint to future development.

The 2020 UWMP reviews specific water use metrics reported in MCWD's 2010 and 2015 UWMP to support the State's target of a 20% reduction in average per capita daily water demand by 2020. Key water use metrics for meeting the Act's requirements include the base daily per capita water use, the compliance daily per capita use, and the interim per capita water use target. The base daily per capita water use was developed using a 10- and 5-year continuous record of water demand (MCWD records) and service area population (US Census data and DOF estimates). This data was then used to determine a base daily per capita water use, measured in gallons per capita per day (GPCD). Several methods were available to determine the compliance daily per capita use, or the 2020 target. In the 2010 and the 2015 UWMPs, MCWD chose to apply Method 1, a 20% reduction of the 10-year average GPCD or a 5% reduction from the 5-year record, whichever is lowest. The result for MCWD's base daily per capita water use is 181 GPCD. This result is higher than reported in the 2010 UWMP. Baseline population numbers used to develop the compliance target in the 2010 UWMP were decreased based on updated peak population estimates from the Town of Mammoth Lakes (Town). Changes to the base daily per capita water use resulted in developing new compliance targets. The 2015 interim per capita water use target was 163 GPCD and the 2020 compliance daily per capita water use is 145 GPCD. MCWD met the 2015 interim per capita water use target with a GPCD use of 94.

The ten-year baseline demonstrates a steadily declining per capita water demand. Per capita water use declined approximately 33% over the baseline period due to a combination of a 70% decrease in water distribution system losses and demand management (conservation) measures. Between 2010 and 2015, per capita water demand dropped 29%. Based on the compliance methodology established by DWR, the District met the 2015 interim daily per capita water use target. The baseline data applies gross water use as all treated and raw water delivered to customers and water losses in the distribution system. Water treatment plant process water losses (such as filter backwash) and recycled water used for irrigation are excluded from gross water use.

Gross water production and use data was developed from effluent meters at the District's four water treatment facilities, meters on production wells supplying raw water for direct distribution to irrigation users, and customer meter billing data. Population data for this analysis relied on federal census data and estimates developed by the State of California Department of Finance for non-census years, Town peak population estimates, and transient occupancy rates. Since 2015

⁶¹ Mammoth Community Water District, Urban Water Management Plan, May 2021: <https://mcwd.dst.ca.us/wp-content/uploads/2021/05/Final-2020-UWMP.pdf>

visitation to the service area increased, resulting in modification to the equation utilized to determine the service area’s “effective population”.⁶²

MCWD met the 145 GPCD compliance target for 2020 with a GPCD use of 94. The District will continue its demand management and conservation efforts as an integral part of its water supply strategy to ensure future per capita water use remains below the compliance daily per capita use of 145 GPCD.

As shown on Table 4.18-1, Project Estimated Water Demand, it is estimated the Project will demand a total of approximately 11 acre-feet. The Project’s water consumption increase will be met within the remaining approximately capacity of the MCWD per the UWMP.

**Table 4.18-1
Project Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total		
			Gallons / day	Gallons / year	Acre-feet / year
Per Capita	106 persons	94 gallons / capita / day	9,964	3,636,860	11
gpd = gallons per day, 1 acre-feet = 325,851 gallons Mammoth Community Water District, Urban Water Management Plan, May 2021. MCWD met the 145 GPCD compliance target for 2020 with a gallons per capita per day use of 94. Table: CAJA Environmental Services, September 2025.					

The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected growth of different uses based on buildout of the General Plan and population projections from the California Department of Finance. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit.

The existing water system infrastructure would not be able to deliver proposed demand at the Project Site due to piping constraints. The water pipelines are constructed of either steel, ductile iron pipe (DIP), or polyvinyl chloride (PVC). The MCWD has worked with design engineers associated with the existing Lodestar Master Plan developments and the Project development to ensure that the future design of development constructed under the Project would be sufficient to meet expected water demands.

The Municipal Code contains detailed water-efficient landscape requirements. The purpose of Chapter 17.40 (Water Efficient Landscape Regulations), is to (a) implement the Water Conservation in Landscaping Act; (b) reduce water waste in landscaping by promoting the use of region- appropriate plants that require minimal supplemental irrigation, and by establishing standards for irrigation efficiency; (c) establish a structure for designing, installing and maintaining water efficient landscapes; and (d) promote the effective and efficient irrigation of landscapes. Under Chapter 17.40, among other regulations, plants must be selected according to their adaptability to the climatic, geologic and topographical conditions of Mammoth Lakes. Native species and natural areas are to be protected and preserved to the extent possible. Plants having similar water use should be grouped together by hydrozone and landscape area shall use efficient

⁶² Mammoth Community Water District, Urban Water Management Plan, May 2021: <https://mcwd.dst.ca.us/wp-content/uploads/2021/05/Final-2020-UWMP.pdf>

water conservation practices and shall generally separate areas of similar slope, sun exposure, soil, and other site conditions appropriate for the selected plants.

Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Extension of utilities and connections at the Site are understood to occur within developed areas. The Site is surrounded on the north south and east sides by similar development that all required utilities connections. Minimal disruption of vehicles and pedestrians during construction would be facilitated with flagmen and alternate routes if necessary. Construction activities associated with upsizing and/or connection to existing lines would not result in significant impacts as the construction activities would be temporary. Emergency vehicle access would be maintained. This disruption would be minimal and temporary and would cease with the ending of that specific phase of construction.

The Project will connect to an existing water line on Meridian Boulevard. As such, new or expanded water lines beyond these would not be needed to convey water to the Project Site. Impacts related to water infrastructure would be less than significant.

Wastewater

Wastewater is collected at the MCWD Wastewater Treatment Plant (WWTP) located at the MCWD main facility. The WWTP has a design average daily flow of 4.1 million gallons. It treats wastewater through preliminary, primary, and secondary treatment processes and discharges disinfected secondary treated effluent for disposal at Laurel Pond, which is located approximately 5½ miles southeast of Mammoth Lakes on USFS land. Laurel Pond is a terminal surface water feature that, prior to initiation of treated effluent discharge, dried up during sustained drought periods. MCWD has an obligation to maintain a minimum of 18 acres of water surface area at Laurel Pond as a mitigation measure for the recycled water project. During the summer months, the District also delivers disinfected tertiary recycled water to two local golf courses and a trucked recycled water program for construction use. 1,259 acre-feet of wastewater was treated by MCWD in 2020. The slight mismatch between the total wastewater treated and the sum of discharged treated wastewater and recycled water used in the service area is caused by the timing of treatment between two different calendar years (Christmas/New Year's holidays) when holding basins are used to even out flows to the WWTP. Golf course irrigation and construction uses utilized 193 acre-feet and 1,045 acre-feet of tertiary treated wastewater was discharged to Laurel Pond. The tertiary water that was not distributed in the service area was lost due to evaporation or was pumped back to the WWTP.⁶³

There is adequate capacity in existing wastewater treatment facility to accommodate future housing development to meet the Town's RHNA during this planning period. To comply with SB 1087, Mammoth Lakes will forward the adopted Housing Element to water and wastewater

⁶³ Mammoth Community Water District, Urban Water Management Plan, May 2021: <https://mcwd.dst.ca.us/wp-content/uploads/2021/05/Final-2020-UWMP.pdf>

providers so they can grant priority for service allocations to proposed developments that include units affordable to lower-income households.⁶⁴

As shown on Table 4.18-2, Project Estimated Wastewater Generation, it is estimated the Project will generate a total of approximately 11 acre-feet. The Project's wastewater generation increase will be met within the remaining approximately capacity of the WWTP.

The RWQCB enforces waste discharge requirements for the MCWD's service area and WWTP. The Project Site is not served by a private on-site wastewater treatment system but instead conveys wastewater via municipal sewage infrastructure maintained by the MCWD. The MCWD wastewater treatment plant is a public facility and therefore, is subject to the State's wastewater treatment requirements. Consequently, wastewater from the Project Site is, and would continue to be, treated according to the wastewater treatment requirements enforced by the LRWQCB. Therefore, the Project would not exceed wastewater treatment requirements. Impacts would be less than significant.

Table 4.18-2
Project Estimated Wastewater Generation

Land Use	Size	Water Demand Rates	Total		
			Gallons / day	Gallons / year	Acre-feet / year
Per Capita	106 persons	94 gallons / capita / day	9,964	3,636,860	11

gpd = gallons per day, 1 acre-feet = 325,851 gallons
Mammoth Community Water District, Urban Water Management Plan, May 2021. MCWD met the 145 GPCD compliance target for 2020 with a gallons per capita per day use of 94.
Wastewater generation is assumed to be consistent with water demand.
Table: CAJA Environmental Services, September 2025.

Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Extension of utilities and connections at the Site are understood to occur within developed areas. The Site is surrounded on the north south and east sides by similar development that all required utilities connections. Minimal disruption of vehicles and pedestrians during construction would be facilitated with flagmen and alternate routes if necessary. Construction activities associated with upsizing and/or connection to existing lines would not result in significant impacts as the construction activities would be temporary. Emergency vehicle access would be maintained. This disruption would be minimal and temporary and would cease with the ending of that specific phase of construction.

The Project will connect to an existing sewer line on Meridian Boulevard. As such, new or expanded sewer lines beyond these would not be needed to convey water to the Project Site. Impacts related to sewer infrastructure would be less than significant.

Water Drainage

⁶⁴ Mammoth Lakes, Housing Element, 2019: <https://www.townofmammothlakes.ca.gov/DocumentCenter/View/9756/Adopted-Mammoth-Lakes-2019-2027-HE>

Storm drainage requirements are outlined in the Storm Drain Master Plan, and when determined necessary due to the intensity and/or type of proposed development.

As discussed in Section 4.10, above, the Project will increase the percentage of impervious surfaces within the Project Site due to an increase in structures and paving. Therefore, stormwater flows from the Project Site will increase with implementation of the Project.

Onsite storm drain facilities will be sized for the 20-year storm event. As expected, the increase in impervious area due to the proposed improvements increases the runoff rates. The increase in flow will be retained on-site.

The project site will maintain its overall drainage pattern of flowing from the southwest to the northeast at an average site slope of 4.5%. The retention pipe will have an ultimate discharge at the existing 36-inch storm drain located at the northeast corner of the site on Joaquin Road.⁶⁵

The storm drain system is designed to convey flows from the 20-year storm event, while the retention facility is sized to capture and store the 100-year peak flows that exceed the 20-year design capacity.⁶⁶

Therefore, impacts would be less than significant.

Electricity

Dry utilities (electrical service) are available throughout the Town for any future development or redevelopment. Southern California Edison (SCE) provides electrical power to Mammoth Lakes. Electrical service is available and will be provided in accordance with the SCE Rules and Regulations. Accordingly, operation of the Project will not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power facilities, the construction and operation of which causes significant environmental effects.

The Site is in Climate Zone 1. Per CalEEMod default data for a single-family residence subject to Title 24, the electricity rate is 191.61 kilowatt-hours (KWhr) per dwelling unit.⁶⁷ With 38 units, the total is 7,281KWhr. To put this number into perspective, the value is compared to SCE network demand of approximately 90 billion KWhr. The Project represents approximately 0.000007% of the SCE network demand.

Propane is also commonly used in Mammoth Lakes to fuel furnaces, water heaters, and stoves. AmeriGas and Eastern Sierra Propane both provide propane to Mammoth Lakes.

Telecommunications

The Project will require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications

⁶⁵ Page 2, Drainage Report, BKF Engineers, June 17, 2025

⁶⁶ Page 8, Drainage Report, BKF Engineers, June 17, 2025

⁶⁷ CalEEMod version 2020.4.0, Appendix D (Default Data Tables), Table 8.1.

infrastructure. Construction impacts associated with the installation of telecommunications infrastructure primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and cease to occur when installation is complete. Installation of new telecommunications infrastructure at the Project Site will be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. All on-site work will occur be within the overall Project construction activities, which have been analyzed above. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines will be coordinated with service providers.

Frontier provides telephone service to the Town. It has the infrastructure in place to meet the Project demand. Based on Project description, approximately 38 phone lines will be needed. This is a less-than-significant impact.

Cumulative Impacts

Less Than Significant Impact.

Each project would be evaluated on a case-by-case basis and would be required to comply with all applicable State water conservation programs and sewer allocation ordinances and stormwater requirements, and dry utilities requirements. Therefore, the cumulative impact would be less than significant and the Project's contribution to cumulative impacts would not be cumulative considerable.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Less Than Significant Impact.

The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected growth of different uses based on buildout of the General Plan and population projections from the California Department of Finance. The UWMP demonstrates adequate capacity currently and future capacity to accommodate growth into which the Project would easily fit. Therefore, the impacts on water supply would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

It is unknown whether or not the Related Projects or other developments in the service area have been taken into account in the UWMP. Nonetheless, it can be assumed that any development projects that are not included in the UWMP would be required to identify water supplies prior to project approval. Therefore, cumulative impacts on water supply would be less than significant.

- c) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact.

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows and impacts would be less than significant.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

The Related Projects would be required to obtain final approval of sewer capacity and connection permits during the Project's permitting process. Therefore, no significant cumulative impacts would occur.

- d) **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Less Than Significant Impact.

Solid Waste

The Mono County Environmental Health Department serves as the Local Enforcement Agency (LEA) for the solid waste facilities in Mono County. Mono County was designated and certified as the LEA in 1992 by the California Department of Resources Recycling and Recovery (CalRecycle) (which was then known as the California Integrated Waste Management Board (CIWMB)).

County landfills are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.

Beginning January 1, 2023, all waste collected in the Town will be sent to the Russell Pass Sanitary Landfill in Fallon, Nevada.

Walker and Pumice Valley landfills have onsite Transfer Stations that accept municipal solid waste, recycling, and HHW for transport. The sites accept inert C&D in a separate area for

quarterly burial and cover. The disposal rates and capacity of the landfills is shown in Table 4.18-3.

The landfills do not currently face capacity issues. The remaining daily capacity for the Pumice C&D landfill is estimated at approximately 98 tons per day.

Construction of the Project will generate minimal amounts of construction and demolition debris that will need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50% of its solid waste from landfill disposal through source reduction, recycling, and composting. Accordingly, much of this material will be recycled and salvaged. Materials not recycled will be disposed of at local landfills.

**Table 4.18-3
Waste Disposal and Capacity**

Landfill	Average Disposal Rate	Max Disposal Rate	Max Annual Disposal
Pumice Valley	12 tons / day	110 tons / day	n/a
Walker	1 ton / day	80 tons / day	500 tons / year
Russell Pass (Nevada)	Not available	580 tons / day	Not available
Mono County Integrated Waste Management Plan, January 2015: https://monocounty.ca.gov/sites/default/files/fileattachments/planning_division/page/4265/integrated_waste_management_plan_pc_11.12.15.pdf CalRecycle, Solid Waste Information System: https://www2.calrecycle.ca.gov/SolidWaste/Site/Search Nevada Division of Environmental Protection, Solid Waste Permitted Facility Summary: https://nvwastemanagementreports.ndep.nv.gov/PermittedFacilitySummary.aspx Mammoth Disposal Transfer Station Expansion Project, IS/MND, May 2021, Table 4.19-4: https://www.townofmammothlakes.ca.gov/DocumentCenter/View/11435/Mammoth-Transfer-Station_Public-Review-Draft-ISMND_05-10-21			

See Table 4.18-4, for the Project Demolition and Construction Waste Generation. Demolition and construction will generate approximately 302 tons of construction waste. Assuming 1.5 years of construction yields an average of 0.5 tons per day. This is a conservative estimate that does not include recycling efforts.

**Table 4.18-4
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Demolition Waste			
Residential	1,500	155 pounds / sf	116
Non-residential	0	173 pounds / sf	0
Asphalt	0	75 pounds / sf	0
Construction Waste			
Residential	84,946 sf	4.38 pounds / sf	186
Non-residential	0	3.89 pounds / sf	0
Total			302

**Table 4.18-4
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Over the entire total schedule of construction. sf = square feet, 1 ton = 2,000 lbs Based on 173 pounds of nonresidential demolition per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-3 and Table A-4, pages A-2 to A-3: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998. Applied generation rates are averages of empirical waste assessments of residential demolition, non-residential demolition, residential construction, and nonresidential construction waste streams in the United States. Using conservative amount. Based on 3.89 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf 1 cubic foot of asphalt weights 150 pounds. The asphalt at the site is assumed to be 6 inches thick. Table: CAJA Environmental Services, September 2025.			

This amount of construction waste will represent approximately 0.47% of the Pumice C&D landfill existing remaining disposal capacity of 98 tons per day. Since the County's unclassified landfill generally does not face capacity shortages, and the landfill will be able to accommodate Project-generated waste, construction of the Project will not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste.

As shown on Table 4.18-5, Project Estimated Solid Waste Generation, it is estimated the Project will generate a total of approximately 465 pounds per day (0.23 tons) of solid waste.

**Table 4.18-5
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Residential	38 units	12.23 pounds / day	465
Total Increase			465
Note: 1 ton = 2,000 pounds. CalRecycle Solid Waste Generation Rates: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates Table: CAJA Environmental Services, September 2025.			

In the Town's efforts to comply with AB 939, the Town has successfully diverted 38% of its waste from the local landfill through the Town's recycling program. The Project would be incorporated into the Town's recycling program. Thus, it is likely that the amount of solid waste generated by the Project that would go to the local landfills would be much less than the estimated

approximately 465 pounds per day. The Town’s residential disposal rate target is 17.6 pounds per person per day (ppd). In 2019 (the last year reported), the Town’s rate was 14.6 ppd.⁶⁸

This amount of operation waste will represent approximately 0.03% of the Russell Pass Sanitary Landfill existing disposal capacity of 580 tons per day. Based on the above, the landfills that serve the Project Site have ample permitted capacity to accommodate the solid waste generated by the Project.

Cumulative Impacts

Less Than Significant Impact.

The Project’s contribution during operation would not be cumulatively considerable, and cumulative impacts with regard to solid waste disposal capacity from operations would be less than significant.

e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less Than Significant Impact.

Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁶⁹ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. The Project would also comply with AB 939, AB 341, AB 1826 and waste diversion goals, as

⁶⁸ CalRecycle, Jurisdiction Diversion/Disposal Summary
<https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>

⁶⁹ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939. Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Like the Project, the Related Projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each Related Project on a project-by-project basis at the time of plan submittal to the Town for the necessary building permits and reviews conducted pursuant to the Building Code, as applicable. Specifically, the Project and Related Projects would be required to promote source reduction and recycling, consistent with AB 939.

Therefore, construction and operation of the Project and the Related Projects would comply with applicable state or solid waste regulations and would not result in significant cumulative impacts. As such, the Project's contribution during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.

4.20 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

No Impact.

The Project would not affect an emergency response plan. While the Project would introduce new development to the Project Site, such development would conform with all applicable local, county, regional, State, and federal regulations pertaining to emergency safety. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and no impact would occur.

The Town is located within the Inyo National Forest, in the eastern region of the Sierra Nevada mountain range. Portions of the area are heavily forested, which increases the vulnerability of the Town to wildfire. The Site is within a High Fire Hazard Severity Zones designated by Cal FIRE, which illustrate the fire hazard severity within the Town's Urban Growth Boundary and surrounding areas.⁷⁰ The Town's one area within the Very High Fire Hazard Severity Zone is

⁷⁰ Mammoth Lakes, General Plan, 2019, Figure 6 (Fire Hazard Severity Zones and Responsibility Areas): https://www.townofmammothlakes.ca.gov/DocumentCenter/View/9579/General_Plan-Updated-Sep-2019?bidId=

isolated to the southwest corner of town just below the Lakes District, approximately 1 mile southwest of the Site.

Vegetation management is considered an effective method of wildfire hazard management and mitigation. To address vegetation management within the Town, a Fire Protection Plan (FPP) approved by the fire code official, is required for all new development within the wildland-urban interface area. FPPs are required to include mitigation strategies that take into consideration location, topography, geology, flammable vegetation, sensitive habitats/species, and climate of the proposed site. FPPs must address water supply, street name and address markings (consistent with Chapter 16.32 of the Mammoth Municipal Code), access, building ignition and fire resistance, fire protection systems and equipment, defensible space, vegetation management, and long-term maintenance. All required FPPs must be consistent with the requirements of the California Building Code Chapter 7A, International Wildland-Urban Interface Code, and the Town of Mammoth Lakes Municipal Code. These vegetation management requirements are optional (but highly recommended) for portions of the Town located within the High and Moderate Fire Hazard Severity Zones, such as the Project Site.

The Project Site is located near the center of the Town and, although the Project Site contains existing forest, the Project would not present any greater risk than would have been created under the Master Plan land use designations for the Project Site. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires and no impact would occur.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact.

The Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact.

The Project is a residential development surrounded by other urban development including residential and commercial uses. The Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk. An internal roadway would serve each individual building. Therefore, no impact would occur.

- d) **Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact.

After a fire, loss of vegetation can lead to increased runoff during rainfall events. Without vegetation to absorb and slow the flow of water, runoff rates can increase, potentially causing downstream flooding. Fires can weaken the soil and slope stability due to the loss of organic material that binds the soil together. This instability can lead to landslides or debris flows, especially during heavy rainfall events. The natural drainage patterns of an area can be altered after a fire due to changes in the landscape and hydrology.

The Project Site is flat. Water runoff and drainage would gravity flow to storm drains.

The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

All Related Projects would be subject to review for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and impacts would be less than significant.

4.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact.

Based on the analyses contained under Checklist Section 1 through Checklist Section 20 above, with adherence to regulatory compliance measures and implementation of project design features and mitigation measures, the Project would not have the potential to degrade the quality of the environment and would not result in any significant unavoidable impacts to the environment.

The Project Site is located within an urbanized area. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project.

The Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed under Checklist Section 5, Cultural Resources, Checklist Section 7, Geology and Soils, and Checklist Section 18, Tribal Cultural Resources, with implementation of measures regarding the potential inadvertent discovery of archaeological, paleontological, and tribal cultural resources, impacts to archeological resources, paleontological resources, and tribal cultural resources would be less than significant. Thus, overall, no evidence is presented that the Project would degrade the quality of the environment.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact.

Although these Related Projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. A significant impact may occur if the Project, in conjunction with the Related Projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis.

The Project has been evaluated in the context of potential cumulative impacts, which consider the combined effects of the project with past, present, and reasonably foreseeable future projects in the surrounding area. As analyzed throughout this MND, the Project’s potential impacts related to air quality, greenhouse gas emissions, noise, transportation, public services, hazards, and other resource areas would be less than significant through compliance with existing regulatory requirements and/or the provided mitigation measures.

While cumulative development may result in broader increases in traffic, utility demand, and regional air pollutant emissions, the project’s incremental contribution to these impacts would be minimal given its low-intensity, self-storage land use and minimal operational trip generation. Furthermore, the Project would not induce substantial population growth, result in the loss of sensitive habitat, or otherwise create environmental effects that, in combination with other projects, would be cumulatively considerable.

The cumulative analyses for each environmental issue addressed above area are contained under Checklist Section 1 through Checklist Section 20 following the assessments of Project impacts. Based on these analyses, cumulative impacts related to all of the above environmental factors would be less than significant and the Project’s contribution to cumulative impacts would not be cumulatively considerable.

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

Less Than Significant Impact.

The Project has been evaluated for its potential to result in substantial adverse effects on human beings, both directly and indirectly, through the analysis of issues such as air quality, noise, hazardous materials, transportation, and public services.

As detailed in the respective sections of this MND, construction activities could generate temporary emissions of air pollutants and noise; however, these would be reduced to less-than-significant levels through compliance with standard construction best management practices.

The Project does not propose operations that would create unusual hazards, excessive traffic safety risks, or significant long-term noise or emissions that could adversely affect human health. No other environmental impacts of the project have been identified that would cause significant adverse effects on human beings beyond those analyzed herein.

Based on the analyses contained under Checklist Section 1 through Checklist Section 20 above, the Project would not result in potentially significant impacts. Therefore, the Project would not have significant environmental effects on human beings, either directly or indirectly.

Section 5

Preparers and Persons Consulted

Lead Agency	Town of Mammoth Lakes Community and Economic Development 437 Old Mammoth Road, Suite R, Mammoth Lakes, CA 93546 Michael Peterka, Associate Planner
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CEQA Consultant	CAJA Environmental Services, LLC 9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311 Chris Joseph, President Stace Henderson, Vice President Sherrie Cruz, Senior Graphics Specialist
Architect	Stanley Saitowitz / Natoma Architects 1022 Natoma Street, No. 3, San Francisco, CA 94103
Arborist	Mason Bruce & Girard 701 High Street, Suite 207, Auburn, CA 95603
Biological	Resource Concepts Inc. 340 N. Minnesota Street, Carson City, NV 89703
Air Quality, Greenhouse Gas Emissions, Noise	DKA Planning 11 Larkey Court, Walnut Creek, CA 94597
Geotechnical	Sierra Geotechnical Services, Inc. PO Box 5024, Mammoth Lakes, CA 93546
Drainage	BKF Engineers 1646 N. California Blvd., Suite 400, Walnut Creek, CA 94596