5.0 ALTERNATIVES

INTRODUCTION

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

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

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*[1]

CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[2] The Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.[3]

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

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

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[4] In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

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1 *CEQA Guidelines Section 15126.6(a).*

2 *CEQA Guidelines Section 15126.6(b).*

3 *CEQA Guidelines Section 15126.6(f).*

4 *CEQA Guidelines Section 15126.6(e)(2).*

Of the various alternatives available for evaluation, the process of selecting project alternatives to be analyzed in this EIR included an identification of the significant effects associated with the Project, a review of the basic objectives established for the project (outlined in Chapter 2, *Project Description*, and in subsection 2, below), and consideration of the land use plans applicable to the project site. Based on these factors, the alternatives that were selected for analysis include:

- **No Project/No Development Alternative:** Under the No Project/No Development Alternative, no improvements to the Planning Area would occur with regard to trails and other recreational facilities. Existing trails and recreational facilities would not be improved/expanded and would continue to operate as they do currently.
- **No Project/Existing Trail Plan Alternative:** Under the No Project/Existing Trail Plan Alternative, the adopted 1991 Mammoth Lakes Trail System Plan would be implemented, which includes the Main Path and Future/Alternative Trails within and outside the Town's UGB, including trails in the Sherwin, Knolls and Shady Rest areas.
- **Reduced Trail Network Alternative:** The Reduced Trail Network Alternative would represent a reduced intensity project that would implement only those TSMP improvements proposed within the Town's UGB, but would not include any of the SHARP projects or other trails and related improvements outside the Town's UGB.

Each of these alternatives is described in more detail in Subsection 5.B, below.

1. OBJECTIVES OF THE PROPOSED PROJECT

The following set of goals and objectives, which are also included in Chapter 2, *Project Description*, of this EIR, have been identified for the Project. These goals and objectives have been considered in the development of the alternatives outlined above.

Goal 1: Develop a plan for an integrated year-round trail network that provides for a seamless transition between the Town of Mammoth Lakes, the Mammoth Mountain Ski Area, and the surrounding federal lands (USFS).

- Objective 1.1: *Identify improvements for signage, wayfinding and amenities throughout the existing network.*
- Objective 1.2: *Close gaps in the existing network.*
- Objective 1.3: *Expand the network within the Urban Growth Boundary to provide access to new destinations, activities and experiences from both public and private property.*
- Objective 1.4: *Identify locations for potential recreation nodes and public access easements that will enhance connections between Town and surrounding public lands for summer and winter recreation.*
- Objective 1.5: *Identify preferred summer and winter uses for each segment in the network.*

- Objective 1.6: *Provide design guidelines that will minimize user conflicts, provide for sustainability, and reduce maintenance needs.*

- Objective 1.7: *Provide uniform signage and wayfinding along the network and at all recreation nodes.*

Goal 2: Develop a plan that enhances mobility in a way that is consistent with the Town's "Feet First" strategy.

- Objective 2.1: *Identify necessary improvements to improve pedestrian safety, convenience and comfort.*

- Objective 2.2: *Update the General Bikeway Plan and develop an on-street bikeway network that enhances bicyclist safety, convenience and comfort.*

- Objective 2.3: *Ensure that pedestrians and bicyclists can access the public transit system safely, conveniently and comfortably; and that public transit serves all key recreation nodes.*

- Objective 2.4: *Provide the information necessary for residents and visitors to navigate around town on foot, bicycle and transit.*

Goal 3: Create a plan that clearly identifies the projects and programs necessary for implementation.

- Objective 3.1: *Provide specific lists of projects that the Town of Mammoth Lakes can incorporate into the Capital Improvement Program. Complete the near-term projects identified in the Trail System Master Plan in the next two years.*

The SHARP also includes the following goals:

SHARP Goal 1: Avoid potential user conflicts while locating recreation facilities appropriately.

SHARP Goal 2: Achieve low overall impact by improving or better defining what is already present.

SHARP Goal 3: Provide for a coherent and satisfying recreation system that includes appropriate signage and wayfinding.

SHARP Goal 4: Ensure that trails and facilities have minimal visual impact and blend with the natural environment and each other.

SHARP Goal 5: Identify opportunities to enhance connectivity and public safety.

SHARP Goal 6: Further wildlife and resource protection, sustainability, and stewardship.

SHARP Goal 7: Achieve practical solutions.

SHARP Goal 8: Maintain opportunities for wildlife observation and interaction.

2. ALTERNATIVES CONSIDERED AND REJECTED

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

- Alternative locations distant from the project site: While it is possible that additional trails and other recreational facilities serving the Town of Mammoth Lakes and surrounding communities could be constructed in areas farther away from the Town and overall Project Area, this would not serve to achieve the overarching intent of the Project, which is generally to formalize and integrate existing and future proposed trails and other recreational facilities to achieve a unified, interconnected system of trails, paths, and recreational destinations within and around the Town of Mammoth Lakes. By locating trails and other recreational facilities at greater distances from the Town population and surrounding communities than is proposed under the Project, this alternative would fail to provide an integrated trail system that is best suited to facilitate use by the population concentrated in and around the Town, and would not provide necessary connections between the Town, MMSA, and USFS lands. Therefore, this alternative would not achieve one of the fundamental goals of the Project and was therefore rejected from consideration.

3. ANALYSIS FORMAT

In accordance with *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be fewer, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, as stated above, will be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area. Where the net impact of the alternative will be clearly less adverse or more beneficial than the impact of the project, the comparative impact is said to be "less." Where the alternative's net impact will be clearly more adverse or less beneficial than the project, the comparative impact is said to be "greater." Where the impacts of the alternative and the project will be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

Table 5-1, *Comparison of Impacts Associated with the Alternatives and Impacts of the Project*, provides a summary comparison of the impacts associated with each of the proposed alternatives with the impacts of the Project.

Table 5-1

Comparison of Impacts Associated with the Alternatives and Impacts of the Project

	Project Impact	Alternative A No Project/ No Development	Alternative B No Project/Existing Trail Plan	Alternative C Reduced Trails Network
A. Aesthetics				
Scenic Vistas	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Scenic Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Visual Quality and Character	Less Than Significant With Mitigation - Construction Less Than Significant – Operation	Less (No Impact – Construction) Greater (Less Than Significant - Operation)	Less (Less Than Significant With Mitigation – Construction) Less (Less Than Significant – Operation)	Less (Less Than Significant With Mitigation – Construction) Less (Less Than Significant – Operation)
Light and Glare	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
B. Air Quality				
Localized Construction Emissions	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Regional Construction Emissions	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Operational Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
AQMP Consistency	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
C. Biological Resources				
Sensitive Species	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Sensitive habitats	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Wetlands	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Wildlife Corridors	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Local ordinances	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
HCCP	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)

Table 5-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Project

	Project Impact	Alternative A No Project/ No Development	Alternative B No Project/Existing Trail Plan	Alternative C Reduced Trails Network
D. Cultural Resources				
Historic Resources	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Archaeological Resources	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Paleontological Resources	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Human Remains	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
E. Geology and Soils				
Seismic Ground Shaking	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Seismic-related ground failure	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Landslides	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Soil Erosion/Loss of Topsoil	Less Than Significant With Mitigation	Greater (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Geologic Stability	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Alternative Wastewater Disposal Systems	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. Greenhouse Gas Emissions				
GHG Emissions	Less Than Significant	Greater (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table 5-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Project

	Project Impact	Alternative A No Project/ No Development	Alternative B No Project/Existing Trail Plan	Alternative C Reduced Trails Network
G. Wildland Fires/Fire Protection				
Wildland Fires	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Fire Protection Services	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
H. Hydrology and Water Quality				
Water Quality	Less Than Significant With Mitigation	Greater (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Drainage Patterns	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Flooding	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
I. Land Use and Planning				
Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. Noise				
Noise - Construction	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Noise - Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
K. Recreation				
Parks and Recreational Facilities	Less Than Significant	Greater (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Park Plans/Policies	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table 5-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Project

	Project Impact	Alternative A No Project/ No Development	Alternative B No Project/Existing Trail Plan	Alternative C Reduced Trails Network
L. Transportation/Traffic				
Traffic	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vehicle Miles Traveled (VMT)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vehicular Hazards	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Parking	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Source: PCR Services Corporation, 2011.

4. ALTERNATIVE ANALYSIS

a. Alternative A – No Project/No Development Alternative

Under the No Project/No Development Alternative, no improvements to the Planning Area would occur with regard to trails and other recreational facilities. Existing trails and recreational facilities would not be improved or expanded and would continue to operate as they do currently.

(1) Environmental Impact Categories

(a) Aesthetics

Under the No Project/No Development Alternative, no trail-related or other recreational facility improvements would occur, and existing trails and other facilities would continue to operate as under existing conditions. As such, no impacts to scenic vistas or scenic resources would result from this Alternative since no construction or physical improvements would occur. However, the beneficial effect of the proposed Project relative to visual character and quality through improved signage, opportunities to consolidate and improve existing informal use trails and parking areas, improve erosion control, and trail maintenance would not occur under this Alternative; however temporary construction effects on visual character and quality would be avoided. Light and glare effects would also not occur under this Alternative. As such, overall, the No Project/No Development Alternative would result in fewer impacts than the Project relative to aesthetics, as no impacts would occur.

(b) Air Quality

Under this Alternative, no construction activities would be necessary and no changes to existing facilities or the use of such facilities would occur. Accordingly, no additional air pollutant emissions would be generated by implementation of this Alternative and therefore no impacts to localized or regional construction emissions or operational emissions would occur. Similarly, given no net increase in air pollutant emissions, no impacts related to AQMP consistency would occur. Impacts would be less than the Project relative to air quality. At the same time, by not building the proposed trail system, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular emissions and associated improvement in long-term air quality,

(c) Biological Resources

This Alternative would not result in any physical changes to the environment, and therefore this Alternative would not have the potential to adversely affect sensitive species or habitats, including wetlands. Additionally, the lack of physical impacts under this Alternative would serve to avoid impacts to wildlife corridors and conflicts with local ordinances protecting biological resources. Impacts to biological resources would be less than under the Project due to the lack of any physical development or ground disturbance. Similar to the proposed Project, no impact to habitat conservation plans would occur under this Alternative.

(d) Cultural Resources

Due to the lack of ground disturbing activities or physical development under this Alternative, no impacts to archaeological, paleontological, or historic resources would occur. Existing resources in the Project Area,

both known and undiscovered, would not be affected by implementation of this Alternative. As such, impacts to cultural resources would be less than the Project.

(e) Geology and Soils

The No Project/No Development Alternative would not result in any physical changes to the Project Area, and therefore would not have the potential to expose people or structures to increased risks associated with seismic ground shaking or seismic-related ground failure. Similarly, no impacts related to landslides, geologic stability, or alternative wastewater disposal systems would result from this Alternative since no additional development would occur. However, this Alternative would not implement trail improvements with regard to stormwater management and erosion control, and therefore operational impacts related to soil erosion and loss of topsoil would be greater than under the proposed Project. Nonetheless, overall geology and soils impacts under this Alternative would be less than the proposed Project.

(f) Global Climate Change

No development would occur under this Alternative, and as such to additional GHG emissions would result from its implementation. Therefore, this Alternative would not result in any adverse impacts related to GHG emissions or consistency with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than the Project. Similar to the discussion for air quality impacts, above, by not building the proposed trail system, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular emissions and associated reductions in GHG emissions.

(g) Wildland Fires/Fire Protection

No changes to the existing environment would occur under this Alternative, and trail and other recreational facility use would be expected to be similar to existing conditions. As such, no incremental increase in trail or other facility use, and associated wildland fire risk, is anticipated. Similarly, given the lack of improvements or increase in trail or other facility use, no increase in demand for fire protection services would occur under this Alternative, and therefore no impacts would occur in this regard. Overall, impacts would be less than the Project under Alternative A.

(h) Hydrology and Water Quality

Alternative A would not result in any physical development, and therefore no construction or ground-disturbing activities would occur that could temporarily increase potential adverse water quality effects to receiving waters or other sensitive resources. Likewise, the lack of physical changes to the environment would preclude potential adverse effects related to altered drainage patterns or flooding. However, since trail and other recreational facility improvements would not occur, including associated stormwater management facilities and BMPs, operational water quality impacts would be greater than under the proposed Project. Overall, however, Alternative A would result in reduced impacts relative to hydrology and water quality.

(i) Land Use and Planning

The No Project/No Development Alternative would not entail any approvals or physical improvements. As such, this Alternative would have no potential to result in conflicts with existing plans, policies, or

regulations applicable to the Project Area. Therefore, no land use impact would occur and impacts would be less than the proposed Project.

(j) Noise

Implementation of Alternative A would not result in any physical changes to the environment, and therefore would not have any potential to generate noise or vibration beyond what currently exists. Because this Alternative would not result in any construction activities and would not modify the exist operation of trails and other facilities in the Project Area, no impacts related to noise or vibration would occur. Therefore, noise and vibration impacts would be less than under the Project.

(k) Recreation

The No Project/No Development Alternative would not result in any changes to trails or other recreational facilities, nor would it affect the utilization of such facilities by the community. As such, this Alternative would not result in any adverse impacts to parks or recreational facilities. Likewise, the lack of any physical development or changes to recreational facilities under this Alternative would preclude the potential for conflicts with applicable plans regarding recreational facilities. However, the recreational opportunities offered by the development of a town-wide trails system, including improved connectivity to parks and open space lands in and around Mammoth Lakes would not be realized, which would be a worse condition relative to the proposed project. Therefore, impacts related to parks and recreational facilities would be greater than under the proposed Project.

(l) Transportation/Traffic

Potential transportation impacts associated with Alternative A are evaluated under summer and winter conditions. The No Project/No Development Alternative assumes no additional trail improvements are implemented. The following items are evaluated under this alternative:

- Traffic impacts are assessed in terms of trip generation and traffic operations of intersections and roadways throughout Town. Traffic impacts are also evaluated for the project construction phases.
- Project impact on Vehicle-Miles Traveled (VMT)
- Project impact on driver sight distance
- Project impact on pedestrian crossing conditions
- Impact on parking conditions

In addition, the interface between the proposed trail system and the transit system is addressed.

Traffic Impacts

Potential traffic impacts of the No Project/No Development Alternative are evaluated for both summer and winter conditions.

Summer Traffic Impacts

As no additional trails would be constructed under this alternative, no increase in summer trail users is expected. As a result, there would be no increase in vehicle trips associated with the trails. The portion of trips made in Mammoth via non-auto modes during the non-winter months is not expected to change. Additionally, the portion of MUP users driving to/from the trails would not change. No impact on traffic operations during the summer season is expected. The No Project/No Development Alternative would not cause intersection and roadway conditions to exceed adopted standards.

Winter Traffic Impacts

Under the No Project/No Development Alternative, no additional grooming or clearing of the trails for cross-country skiing or walking would occur. As such, no increase in winter trail use is expected. Similarly, as no additional trails would be groomed for motorized access, no increase in vehicle trips would be expected to result from this type of trail improvement. No traffic impacts would result from the No Project/No Development Alternative in the winter season, and no intersection and roadway conditions would exceed adopted standards.

Traffic Impacts During Construction

As no construction work is associated with the No Project/No Development Alternative, there is no potential for construction-related transportation impacts to occur.

Impact on Vehicle-Miles Traveled

The impact of the No Project/No Development Alternative on Vehicle-Miles Traveled (VMT) is evaluated for both summer and winter conditions. The effect of the proposed project on VMT in Mammoth is dependent on the total trip generation and the length of these vehicle trips. Implementation of the No Project/No Development Alternative is not expected to increase the number of persons travelling to use the trails system, as no additional trail improvements would be provided. Given this, and considering that there would be no change in the average trip length associated with the trails, no VMT impact is expected in the summer and winter seasons.

Driver Sight Distance

Driver stopping sight distance was reviewed at the existing at-grade MUP crossing locations. In general, adequate driver sight distance is provided, with the exception of one crossing location. There is an existing safety deficiency at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road. The stopping sight distance provided for drivers traveling northbound along Majestic Pines Drive is limited by the horizontal curvature along the roadway and the existing embankment and vegetation. It is recommended that improvements be made to provide at least 150 feet of stopping sight distance for northbound drivers approaching this crossing. This could be accomplished by modifying the MUP trail alignment and/or modifying the existing landscaping and embankment. With this improvement, the No Project/No Development Alternative would provide adequate driver sight distance.

Trail Crossing Conditions

Existing trail crossing conditions were reviewed. In general, adequate crossing conditions are provided under the No Project/No Development Alternative, with the exception of the driver sight distance concern discussed above.

Parking Impacts

The parking impacts of the No Project/No Development Alternative are evaluated. As no increase in the number of trail users is expected, and no change in the existing non-auto mode split is expected under the alternative, no change in parking demand would occur during the summer season. In the winter, no additional groomed trails would be provided, and no increase in trail users is expected. Therefore, no change in parking demand would occur. Access to recreational facilities over the course of a peak day is typically limited by the amount of parking available; the alternative would not increase the amount of available parking, or formalize and consolidate any of the existing informal parking that occurs at some locations near trails. On balance, however, since the No Project/No Development Alternative is considered to provide adequate overall parking conditions, the net impact relative to the proposed project would be neutral.

Interface Between Trail System and Transit System

The locations of existing transit facilities are reviewed with respect to existing trailhead locations. Transit service is considered to access a trailhead if a bus route is located within one-quarter mile of the trailhead. Some existing trailheads in Mammoth are located more than one-quarter mile away from the existing bus routes. No additional bus/trolley service or transit facilities are proposed to be provided under the No Project/No Development Alternative. However, as the No Project/No Development Alternative would not decrease the performance or safety of transit facilities, this is not considered to be a significant impact.

Future Cumulative Conditions

Although traffic volumes in Mammoth are generally expected to increase in the future, the No Project/No Development Alternative would not impact traffic operations under future cumulative conditions.

Traffic/Transportation Impact Summary

Overall, Alternative A would not result in any changes to the existing traffic system or have any effect on traffic patterns, levels of service, or availability of parking. However, the alternative would not expand the trails system or provide new opportunities for vehicle trips to be diverted to non-auto modes. Nonetheless, on balance the traffic and parking impacts are less than under the proposed Project, as no additional traffic would be generated under this Alternative. However, recommended improvements regarding adequate driver sight distance at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road would still be required to reduce the significance of impacts in this regard, similar to the proposed Project.

(2) Impact Summary

A comparative summary of the environmental impacts associated with the No Project/No Development Alternative with the environmental impacts anticipated under the Project is provided in Table 5-1. As summarized in Table 5-1, the No Project/No Development Alternative would result in reduced impacts with regard to all environmental issues, with the exception of operational visual quality and character (greater impact than the Project), impacts to habitat conservation plans (similar impact to the Project), soil erosion/loss of topsoil (greater impact than the Project), operational water quality (greater impact than the Project), recreation (parks and recreational facilities), and vehicular hazards (similar impact to the Project).

(3) Relationship of the Alternative to Project Objectives

The ability of Alternative A to meet the stated goals and objectives of the Project is summarized below in **Table 5-2**, *Project Alternatives' Ability to Meet Project Goals and Objectives*. As summarized in Table 5-2, Alternative A would fail to meet any of the Project's goals and objectives, either partially or fully.

b. Alternative B – No Project/Existing Trail Plan Alternative

Under the No Project/Existing Trail Plan Alternative, the adopted 1991 Mammoth Lakes Trail System Plan would be implemented, which includes the Main Path and Future/Alternative Trails within and outside the Town's UGB including trails in the Sherwin, Knolls and Shady Rest areas. The 1991 TSMP has a much more limited set of related improvements than the proposed Project; for example, it does not include bicycle facilities or any substantial improvements to recreational nodes. Under this Alternative, remaining unbuilt Main Path segments would be built, including the "4A" segment between Mammoth Creek Park and Minaret Road, Lodestar, and Main Street segments. "Future/Alternative" Trails would also be developed within and outside the Town's UGB as deemed necessary, which would include Shady Rest Park Trail, Meridian Trail, Mammoth Creek Trail, Sherwin Trail, Sherwin Creek Trail, Mammoth Mountain Trail, and Knolls/Overlook Trail. These improvements would be implemented in accordance with the design specifications and other recommendations contained in the adopted 1991 Trail System Plan, as well as any subsequent amendments.

(1) Environmental Impact Categories

(a) Aesthetics

Under the No Project/Existing Trails Plan Alternative, the 1991 Trail System Plan would be fully implemented similar to the proposed Project, but would be limited in terms of geography and intensity of improvements. Under this Alternative, temporary construction activities and operation of permanent improvements would result in less than significant impacts to scenic vistas and other scenic resources in the Project Area, but to a lesser extent than the Project given the reduction in number and intensity of improvements. Similarly, this Alternative would result in reduced impacts to visual quality and character during construction relative to the Project, though mitigation measures would still be required to reduce impacts to less than significant. Operational impacts regarding visual quality and character would be less than significant and less than the Project. Due to the reduction in number and intensity of proposed improvements under this Alternative, light and glare impacts would also be reduced, and would be less than significant.

(b) Air Quality

Implementation of Alternative B would entail the construction of improvements per the 1991 Trail System Plan, which would represent a reduction in intensity of development and usage of proposed facilities relative to the proposed project. This incremental reduction in trail and other facilities under this Alternative would result in a proportionate reduction in air pollutant emissions associated with construction and operation of proposed facilities. Therefore, localized and regional construction emissions impacts, as well as operational emissions impacts, would be reduced relative to the proposed Project, though mitigation measures would still be required to reduce construction-related impacts to less than significant. Given the reduction in overall emissions, impacts related to AQMP consistency would also be less than significant, similar to the proposed Project. By not building a trail network as extensive as the proposed Project, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular emissions and associated improvement in long-term air quality,

(c) Biological Resources

The No Project/Existing Trails Plan Alternative would result in similar improvements as under the proposed Project, but would be reduced in terms of number of improvements and intensity of construction activities and operational utilization. Therefore, the implementation of this Alternative would have a reduced potential to adversely affect sensitive species and habitats (including wetlands) due to fewer construction activities relative to the proposed project. Similarly, operation of proposed facilities under this Alternative would result in incrementally reduced trail and other facility usage by the community, and therefore operational effects on biological resources would be less than the proposed Project. Additionally, the reduction in construction activities and operational intensity within the Project Area would result in fewer impacts regarding wildlife corridors and conflicts with local ordinances protecting biological resources relative to the Project. However, similar to the proposed Project, this Alternative would not result in any impacts associated with habitat conservation plans.

(d) Cultural Resources

The No Project/Existing Trails Plan Alternative would implement a number of trail and other recreational facility improvements within the Project Area, but would include substantially fewer construction activities, particularly outside the Town's UGB. Accordingly, given the reduction in construction intensity and associated ground disturbance, the potential for adverse impacts to archaeological and paleontological resources, including human remains, would be incrementally reduced relative to the Project, though mitigation measures would still be required to reduce the significance of these impacts. Likewise, based on the reduction in proposed improvements and associated construction activities under this Alternative, impacts related to historic resources would also be proportionately reduced, though mitigation measures would still be required to reduce impacts to less than significant.

(e) Geology and Soils

Alternative B would result in the implementation of trail and other recreational facility improvements throughout the Project Area, but to a lesser degree than the Project. Therefore, this Alternative would expose fewer people and structures to hazards associated with seismic ground shaking and seismic-related ground failure, and these impacts would be less than the Project and less than significant. Similarly, impacts related to landslides, soil erosion/loss of topsoil, and geologic stability would be incrementally reduced compared to the Project, but mitigation would still be required to reduce impacts to less than significant.

However, similar to the proposed Project, impacts related to alternative wastewater disposal systems would be less than significant.

(f) Greenhouse Gas Emissions

This Alternative would result in reduced construction activities and trail and other recreational facility usage relative to the Project, and therefore its implementation would be expected to generate incrementally fewer GHG emissions. Based on the overall reduction in construction and operational GHG emissions under this Alternative, impacts in this regard would be less than the proposed Project and would be less than significant. However, as is the case with the Project, this Alternative would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than significant. By not building a trail network as extensive as the proposed Project, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular-related GHG emissions.

(g) Wildland Fires/Fire Protection

The reduction in overall trail and other recreational facility usage under the No Project/Existing Trails Plan Alternative would have a proportionate effect on wildland fire potential associated with operation of proposed facilities. With the reduction in trail and recreational facility usage in and near wildland areas, wildland fire hazard impacts would be less than the Project, though mitigation would still be required to reduce impacts to less than significant. Additionally, this Alternative would result in a reduction in demands for fire protection services compared to the Project, and impacts would be less than significant in this regard.

(h) Hydrology and Water Quality

Implementation of Alternative B would entail fewer improvements than those included under the proposed Project, and as such this Alternative would result in reduced construction activities and operational intensity within the Project Area. Therefore, Alternative B would require less earthwork and would have a reduced potential to result in adverse water quality effects during construction activities, and would also have a lower potential to contribute to impacts to receiving water bodies or other sensitive resources during project operations. Although this Alternative would have a reduced potential to result in adverse water quality impacts, mitigation measures would still be required to address construction and operation of proposed facilities and reduce impacts to less than significant. Similarly, the reduced intensity of construction and operation under this Alternative would result in fewer impacts regarding drainage patterns and flooding potential relative to the Project; impacts would be less than significant, though mitigation would still be required to reduce flooding impacts to less than significant.

(i) Land Use and Planning

This Alternative would implement the Town's adopted 1991 Trails System Plan and would not require any further plan amendments or approvals to implement. While this Alternative may require incidental approvals for specific improvements (e.g,, Conditional Use Permits), such approvals would be similar to those required for the proposed Project, which would also require approval of the TSMP itself in addition to incidental permits and other approvals. This Alternative would not conflict with any applicable plans, policies, or regulations affecting the Project Area. As such, impacts would be less than significant and similar to the proposed Project.

(j) Noise

As noted previously, this Alternative would result in incrementally reduced construction and operational intensity relative to the proposed Project. Accordingly, noise and vibration effects associated with the proposed improvements would be incrementally reduced compared to the Project. Construction activities would still require mitigation measures to reduce temporary noise impacts to less than significant, but operational noise, and construction and operational vibration effects, would be less than significant.

(k) Recreation

Alternative B would result in the improvement of various trails and other recreational facilities within the Project Area, but to a lesser extent than under the proposed Project. The proposed improvements would serve to increase the usability and safety of existing facilities and improve overall connectivity, but would not be expected to result in the deterioration of parks and recreational facilities, as their use would not be substantially greater than under existing conditions. Given that the proposed Project would result in less than significant impacts in this regard, this Alternative would also result in less than significant impacts, but would be incrementally reduced relative to the Project. Additionally, Alternative B would not result in conflicts with existing plans regarding parks and recreational facilities, similar to the proposed Project.

(l) Transportation/Traffic

Potential transportation impacts associated with Alternative B, the full buildout of the existing 1991 TSMP improvements, are evaluated under summer and winter conditions. Specifically, the following items are evaluated:

- Traffic impacts are assessed in terms of trip generation and traffic operations of intersections and roadways throughout Town. Traffic impacts are also evaluated for the project construction phases.
- Project impact on Vehicle-Miles Traveled (VMT)
- Project impact on driver sight distance
- Project impact on pedestrian crossing conditions
- Project's consistency with other planning documents and studies
- Impact on parking conditions

In addition, the interface between the proposed trail system and the transit system is addressed.

Traffic Impacts

Potential traffic impacts are evaluated for both summer and winter conditions.

Summer Traffic Impacts

The potential increase in summer MUP trail users is estimated, in order to analyze the traffic impacts of the additional MUP trails. The summer traffic impacts of the unpaved trails are also assessed.

Potential Increase in MUP Trail Users

The 1991 TSMP includes an approximately 0.8 miles of additional MUP trails, which would fill-in the gaps in the existing "Main Path" forming a loop around Town. In addition, the 1991 plan includes a series of "Future/Alternative" trails extending out from the Main Path into the Mammoth Mountain Ski Area and other National Forest Lands. The plan does not specify whether the future trails are multi-use paths (similar to the existing MUPs) or soft-surface trails. Therefore, it is assumed that the future/alternative trails with alignments similar to the proposed 2009 MUPs, such as the trails in the Knolls area, the Shady Rest area, and through the meadow in the SHARP area, are multi-use paths. These paths are assumed to be ADA-accessible. The remaining future/alternative trails are assumed to be soft-surface trails. The future/alternative trails assumed to be MUPs total about 7.6 miles. The total increase in MUP trail length associated with the 1991 TSMP is estimated to be about 8.4 miles (0.8 plus 7.6). Adding 8.4 miles to the existing 13.8 miles yields a total proposed MUP trail length of approximately 22.2 miles. This equates to an increase in total MUP trail mileage of about 161 percent. In order to forecast the future total use with implementation of the 1991 TSMP, trail use is assumed to grow roughly equal to the relative growth in trail mileage, consistent with the assumptions for the proposed TSMP.

Multiplying the existing summer peak hour MUP trail use (250) by a factor of 161 percent (or 1.61) yields a total forecast future use of roughly 400 users during the busiest hour of trail use, comprised of about 80 bicyclists and 320 pedestrians. Multiplying this figure by the daily-to-peak hour factor of 6.54, yields a total future use of about 2,616 MUP users per day. Subtracting the total future use from the total existing use (1,635) yields a growth in MUP trail use of about 980 users per day, including roughly 150 users during the busiest summer hour (30 of which is a bicyclist and 120 are pedestrians).

Traffic Impacts of Additional MUPs

The increase in vehicle trips associated with the increase in MUP trail users was evaluated. The proposed TSMP is expected to result in an increase of about 30 bicyclist and 120 pedestrians using the MUP trails during the busiest summer hour. Multiplying the number of users by the proportion of users arriving by car (19 percent of bicyclists and 49 percent of pedestrians using the MUP arrive by car) and dividing by the average vehicle occupancy rate (about 3 bicyclists per car and 2 pedestrians per car) yields an increase of 2 vehicles for bicyclists and up to 30 vehicles for pedestrians. Therefore, an increase of about 32 vehicles is associated with the increase in trail users during the busiest hour. Assuming half of the trail users stay on the trails for more than an hour, about 32 vehicle trips arriving at the trails and 16 vehicle trips departing the trails, or a total of 48 one-way vehicle trips, are associated with the increase in MUP users parking to use the trails during the busiest summer hour.

In addition, about 3 percent of bicyclists and 11 percent of pedestrians are dropped off at the MUP trails. Multiplying the number of users by the proportion dropped off and dividing by the respective average vehicle occupancy rate yields an increase of up to 7 vehicles dropping off MUP trail users. As each drop off generates two one-way vehicle trips, the total increase in one-way trips generated by vehicles dropping off trail users is about 14 trips. Assuming the trail users dropped off are also picked up during the busiest hour, about 7 one-way trips are generated by vehicles picking up trail users, for a total of 21 one-way trips.

Adding the 48 one-way vehicle trips generated by MUP users who park at the trails to the 21 vehicle trips generated by MUP users being dropped off and picked up totals about 69 additional peak-hour one-way vehicle trips generated by the increase in MUP trail users.

Traffic Impacts of Unpaved Trails

The 1991 TSMP includes a series of "Future/Alternative" trails extending out from the Main Path into the Mammoth Mountain Ski Area and other National Forest Lands. As discussed above, about 7.6 miles of these trails are assumed to be MUP trails, and the remaining trails are assumed to be soft-surface trails. Many of these trails are in areas where informal trail use currently takes place. Implementation of the proposed soft-surface trail network is not expected to result in a significant traffic impact, as the traffic impacts would be widely-distributed. The future/alternative soft-surface trails are not expected to generate high concentrations of trail users at any one trailhead, and the 1991 TSMP contains nothing to indicate an undue traffic impact would result at any one location. Overall, the increase in vehicle trips generated by the soft-surface trails is expected to be minimal.

Summary

The 1991 TSMP proposes to add less than 9 miles of MUP trails, provide new and improved soft-surface trails, and improve the trail connectivity throughout Town. This is expected to increase the portion of trips made in Mammoth via non-auto modes during the non-winter months. Additionally, the portion of MUP users driving to/from the trails would generally decrease, as the MUP would be easier to access from the various neighborhoods by non-auto means. Conversely, the improved trail system and facilities could increase the number of persons using the trails and facilities, which could increase the number of vehicle-trips occurring over the course of a busy day, as trail users drive to and from trailheads.

Implementation of the 1991 TSMP could conservatively generate an increase on the order of approximately 70 one-way vehicle trips throughout Town during the busiest summer hour of trail use. It is conservatively assumed that the busiest hour of trail use coincides with the summer peak hour of traffic activity in Mammoth, which generally occurs on weekend afternoons. As the project-generated trips would be distributed to the various trailhead locations, no significant Town-wide traffic impacts are expected to result. Overall, provision of the additional pedestrian and bicycle facilities included in the 1991 plan would result in a general increase in non-auto travel, which would offset the increase in vehicle trips to some degree. No significant impact on traffic operations during the summer season is anticipated. The 1991 TSMP is not expected to cause intersection and roadway conditions to exceed adopted standards.

In comparison with the proposed Project the 1991 TSMP would result in a smaller increase in vehicle trips during the summer season. Specifically, the 2009 TSMP is expected to generate about 30 more one-way peak-hour vehicle trips than the proposed Project.

Winter Traffic Impacts

The 1991 TSMP describes cross-country skiing as one of the primary uses to be accommodated on the Main Path. However, the extent (mileage) of trail to be groomed as a part of this plan is not specified. For the purposes of this study, it is assumed that no additional grooming of the Main Path is included beyond the approximately 2.5 miles of the eastern section of MUP that are currently authorized to be groomed during the winter. Grooming is assumed to be provided, however, along the "future/alternative" MUP assumed to be provided through the meadow in the Sherwins Area. Based on these assumptions, the potential increase in winter trail use is estimated in order to analyze the traffic impacts of the winter trails.

Additional Groomed MUPs

The traffic impacts associated with the new non-motorized groomed trails are estimated based upon the impacts associated with the proposed 2009 TSMP trails. Multiplying the total length of new trail assumed to be provided in the 1991 TSMP (about 3.7 miles of the "future/alternative" trails) by a rate of 5 peak hour vehicle trips per new mile of trail yields an increase of about 19 peak hour vehicle trips (10 entering and 9 exiting) associated with the future non-motorized groomed trails. Although the 1991 plan does not indicate if any of the future/alternative trails would be groomed for motorized access, a modest increase in vehicle trips would be expected to result from this type of trail improvement, given that informal use by snowmobilers already occurs in the area. In order to remain conservative, a total of about 5 new vehicle trips are estimated to be generated by potential motorized groomed trails during the winter peak hour. Any increase in traffic resulting from the formalization improvement of the other recreational facilities is expected to be minimal, considering that most of the areas of improvement are currently utilized under existing conditions.

Summary

Implementation of the 1991 TSMP could generate an increase on the order of about 24 one-way vehicle trips throughout Town during the busiest winter hour of trail use. It is conservatively assumed that the busiest hour of trail use coincides with the winter peak hour of traffic activity in Mammoth, which generally occurs between 4:00 PM and 6:00 PM. As the project-generated trips would be widely distributed, no significant traffic impacts would result from the project in the winter season. The 1991 TSMP is not expected to cause intersection and roadway conditions to exceed adopted standards. In comparison with the proposed 2009 TSMP, the 1991 TSMP would result in a smaller increase in vehicle trips during the winter season. Specifically, the 2009 TSMP is expected to generate about 22 more one-way peak-hour vehicle trips than the 1991 TSMP.

Traffic Impacts During Construction

Traffic impacts due to the construction phases of the 1991 TSMP project are considered. Long-term roadway closures are not expected to occur during construction of the project. Construction activities may occur at multiple locations concurrently. However, any potential transportation impacts associated with the project construction activities at any one time are expected to be modest. Project-specific construction management plans would be analyzed for each project location as well.

Impact on Vehicle-Miles Traveled

The impact of the 1991 TSMP on Vehicle-Miles Traveled (VMT) is evaluated for both summer and winter conditions. The effect of the proposed project on VMT in Mammoth is dependent on the total trip generation and the length of these vehicle trips.

Summer Vehicle-Miles Traveled

Implementation of the 1991 TSMP is not expected to increase the number of persons visiting the Mammoth area from other communities or other regions on a busy summer day, as world-class hiking trails are already provided in the Mammoth area. Although there may be a net increase in trail activity associated with the proposed trail improvements, new trail networks would be provided in the urbanized area, which would result in relatively short vehicle trips. Some trips that are currently made to trails outside the urbanized area would shift to the new trails in or near the urbanized area. This would result in a reduction in the average trip length associated with the trails, thereby reducing total VMT.

The increase in VMT generated by the increase in vehicle trips associated with the new trails is expected to be roughly offset by the reduction in VMT resulting from the provision of trails near the urbanized area and the increase in non-auto mode travel throughout Town. Overall, the proposed project is not expected to result in a significant increase in VMT over the course of a summer day.

Winter Vehicle-Miles Traveled

Similar to summer conditions, implementation of the proposed project is not expected to significantly increase the number of persons visiting the Mammoth area from other communities or other regions on a busy winter day, as the existing trails already serve those wishing to recreate. Although there may be a net increase in trail activity associated with the proposed trail improvements, new trail networks would be provided in the urbanized area, which would result in relatively short vehicle trips. Some trips that are currently made to trails outside the urbanized area would shift to the new trails in or near the urbanized area. This would result in a reduction in the average trip length associated with the trails, thereby reducing total VMT.

The increase in VMT generated by the increase in vehicle trips associated with the new trails is expected to be roughly offset by the reduction in VMT resulting from the provision of trails closer to the urbanized area and the increase in non-auto mode travel throughout Town. Overall, the 1991 TSMP is not expected to result in a significant increase in VMT over the course of a winter day.

It is worth noting that the increase in traffic volumes resulting from the TSMP project would be highest during the summer season, which does not coincide with the peak season of traffic activity in the Mammoth area (traffic volumes in Mammoth are generally highest in the winter season).

Driver Sight Distance

Driver stopping sight distance was reviewed at the at-grade MUP crossing locations included in the 1991 TSMP. In general, adequate driver sight distance is expected to be provided, with the exception of one crossing location. There is an existing safety deficiency at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road. The stopping sight distance provided for drivers traveling northbound along Majestic Pines Drive is limited by the horizontal curvature along the roadway and the existing embankment and vegetation. A detailed evaluation is included in the existing conditions chapter of the Project traffic study (included as Appendix I of this EIR). As the 1991 plan is expected to result in an increase in the number of MUP users at this location, it would therefore exacerbate the existing safety deficiency. This is considered to be a significant impact; however, it is recommended that the 1991 plans be modified to provide at least 150 feet of stopping sight distance for northbound drivers approaching

this crossing. This could be accomplished by modifying the MUP trail alignment and/or modifying the existing landscaping and embankment. With this measure, adequate driver sight distance would be provided and impacts would be less than significant, similar to the proposed Project.

Trail Crossing Conditions

Trail crossing conditions are discussed under this Alternative. In general, adequate crossing conditions are expected to be provided under the No Project/Existing Trails Plan Alternative, with the exception of the driver sight distance concern discussed above. This Alternative is not expected to result in a significant impact on trail crossing conditions at the remaining trail crossings, similar to the proposed Project.

Consistency of 1991 TSMP With Other Planning Documents and Studies

The project's consistency with the following documents is evaluated:

- Main Street South Frontage Road Project and Promenade Walkway
- Main Street Signal Feasibility Study
- Caltrans SR 203 Transportation Concept Report
- Minaret Road Alignment Study
- Mobility Plan

Main Street South Frontage Road Project and Promenade Walkway

The only inconsistency identified between this Caltrans project and the 1991 TSMP project is that the Caltrans plan proposes a sidewalk where the 1991 plan includes a multi-use path from approximately Manzanita Street to Laurel Mountain Road.

Main Street Signal Plan Feasibility Study

No inconsistencies with the 1991 TSMP are identified.

SR 203 Transportation Concept Report

No inconsistencies between the Caltrans SR 203 Transportation Concept Report (TCR) and the 1991 TSMP are identified.

Minaret Road Alignment Study

No inconsistencies are identified between the Minaret Alignment Study and the 1991 TSMP.

General Bikeway Plan

The existing and proposed bikeways included in the adopted General Bikeway Plan were compared to those in the 1991 TSMP. With regards to Class 1 bike paths, the two plans are generally consistent, although the trail alignments differ in some locations. However, the Bikeway Plan includes additional Class 1 trail connections within the vicinity of the Sierra Star Golf Course. The Bikeway Plan also includes a Class 1 bike path along Lake Mary Road, whereas the 1991 TSMP includes an on-street bikeway. Finally, the Bikeway Plan includes on-street bikeways (Class II or Class III) along many roadways where the 1991 TSMP proposes no bicycle facilities.

Mobility Plan

No inconsistencies are identified between the Mobility Plan and the 1991 TSMP.

Parking Impacts

The impact of the 1991 TSMP on parking demand during summer and winter conditions is estimated, and conclusions and recommendations are made regarding overall parking conditions.

Summer Parking Demand

Parking Demand of Additional MUP Trail Users

The increase in parking demand associated with the increase in MUP trail users was evaluated. The 1991 TSMP is expected to result in an increase of about 30 bicyclists and 120 pedestrians using the MUP trails during the summer peak hour. Multiplying the number of users by the proportion of users arriving by car (19 percent of bicyclists and 49 percent of pedestrians using the MUP arrive by car) and dividing by the average vehicle occupancy rate (about 3 bicyclists per car and 2 pedestrians per car) yields an increase in peak hour parking demand of about 2 spaces for bicyclists and 30 spaces for pedestrians. Therefore, the total increase in parking demand associated with the additional MUP trails is about 32 spaces.

Parking Demand of Additional Unpaved Trail Use

As discussed above, the parking impacts associated with the potential soft-surface trails are expected to be minimal. The 1991 plan contains nothing to indicate an undue parking impact would result at any one location. Overall, the increase in parking demand generated by the potential soft-surface trails is expected to be minimal.

Summary

The 1991 TSMP is estimated to add just over 8 miles of MUP trails, provide new and improved soft-surface trails, and improve the trail connectivity throughout Town. This is expected to increase the portion of trips made in Mammoth via non-auto modes during the non-winter months. Additionally, the portion of MUP users parking at the trailheads would generally decrease, as the MUP would be easier to access from the various neighborhoods by non-auto means. Conversely, the improved trail system and facilities could

increase the number of persons using the trails and facilities, which could increase the parking demand occurring over the course of a busy day, as trail users park at trailheads.

Implementation of the 1991 TSMP could conservatively generate an increase in parking demand on the order of approximately 32 parking spaces throughout Town during the summer peak hour. As this demand would be distributed to the various trailhead locations, no significant parking impacts are expected to result at any one location. Overall, provision of the additional pedestrian and bicycle facilities included in the 1991 TSMP would result in a general increase in non-auto travel, which would offset the increase in parking demand to some degree. However, it is recommended that a total of at least 32 additional summer parking spaces be provided as a part of the 1991 plan. In comparison, the proposed Project requires a total of 52 new spaces (20 more spaces than under this Alternative).

Winter Parking Demand

As described above, the additional approximately 3.7 miles of non-motorized groomed trails assumed in the 1991 TSMP are expected to generate about 10 additional vehicles parking during the peak hour. In addition, a total of about 3 parking spaces are estimated to be generated by potential motorized groomed trails during the winter peak hour. The total increase in winter parking demand is about 13 spaces. It is therefore recommended that at least 13 additional winter parking spaces be provided as a part of the 1991 TSMP. The number of additional parking spaces included in the 1991 plan is not specified.

Conclusion

Access to recreational facilities over the course of a peak day is typically limited by the amount of parking available. It is recommended that a total of at least 32 additional summer parking spaces and 13 additional winter parking spaces be provided as a part of the 1991 TSMP. As the 1991 TSMP does not specify the number of additional parking spaces, if any, that are included in the plan, this is a potentially significant impact. However, with provision of the recommended number of additional parking spaces, the 1991 TSMP would provide adequate overall parking conditions.

Interface between Trail System and Transit System

The locations of existing and proposed transit facilities are reviewed with respect to existing and proposed trailhead locations. Transit service is considered to access a trailhead if a bus route is located within one-quarter mile of the trailhead. Some existing trailheads in Mammoth are located more than one-quarter mile away from the existing bus routes. No additional bus/trolley service is included in the 1991 TSMP. However, as the 1991 plan would not decrease the performance or safety of transit facilities, this is not considered to be a significant impact.

Future Cumulative Conditions

As discussed above, the 1991 TSMP would not significantly change traffic volumes at any one location. Although traffic volumes in Mammoth are generally expected to increase in the future, the 1991 TSMP is not expected to result in a significant impact on traffic operations under future cumulative conditions.

Regarding trail crossings, the 1991 plan includes an at-grade MUP crossing where the existing MUP terminates at a point on Minaret Road approximately 150 feet to the north of its intersection with Old Mammoth Road. If a roundabout is installed at the Minaret Road/Old Mammoth Road intersection in the future, it is recommended that the at-grade MUP trail crossing be relocated to the splitter island. With this measure, adequate trail crossing conditions are expected to be provided.

Summary of Recommendations for the No Project/Existing Trails Plan Alternative

The following recommendations are made regarding driver sight distance, parking, and under the No Project/Existing Trails Plan Alternative:

- The 1991 TSMP plans should be modified to provide at least 150 feet of stopping sight distance for northbound drivers approaching the MUP crossing on Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road. This could be accomplished by modifying the MUP trail alignment and/or modifying the existing landscaping and embankment. With this measure, adequate driver sight distance would be provided.
- A total of at least 32 additional summer parking spaces and 13 additional winter parking spaces should be provided with the proposed project. With this measure, adequate overall parking conditions would be provided.
- If a roundabout is installed at the Minaret Road/Old Mammoth Road intersection, the at-grade MUP crossing on Minaret Road should be relocated to the splitter island. With this measure, adequate trail crossing conditions would be provided. Note that this issue does not apply to the proposed 2009 TSMP scenario, due to the fact that a tunnel is proposed to be constructed at this location in lieu of an at-grade crossing. Note that there is no mention of this crossing location under the No Project/No Build Alternative, as it is not an existing MUP crossing.

Traffic/Transportation Impact Summary

Overall, Alternative B would result in fewer changes to the existing traffic system and would have reduced adverse effects on traffic patterns, levels of service, or availability of parking. Therefore, traffic and parking impacts are less than under the proposed Project, as less additional traffic would be generated under this Alternative. However, recommended improvements regarding adequate driver sight distance at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road, as well as mitigation for trail user/pedestrian safety at Minaret Road/Old Mammoth Road, would still be required to reduce the significance of impacts, similar to the proposed Project.

(2) Impact Summary

A comparative summary of the environmental impacts associated with the No Project/Existing Trails Plan Alternative with the environmental impacts anticipated under the Project is provided in Table 5-1. As summarized in Table 5-1, Alternative B would result in less impacts regarding aesthetics (scenic vistas, scenic resources, visual character and quality, and light and glare), air quality (localized and regional construction emissions and operational emissions), biological resources (sensitive species, sensitive habitats, wetlands, wildlife corridors, and local ordinances protecting biological resources), cultural resources (historic resources, archaeological resources, paleontological resources, and human remains),

geology and soils (landslides, soil erosion/loss of topsoil, and geologic stability), greenhouse gas emissions (GHG emissions), hydrology and water quality (water quality, drainage patterns, and flooding), noise (construction and operational noise and vibration), recreation (parks and recreational facilities), and transportation/traffic (traffic and vehicle miles traveled). This Alternative would also result in similar impacts regarding air quality (AQMP consistency), biological resources (habitat conservation plans), geology and soils (seismic ground shaking, seismic-related ground failure, and alternative wastewater disposal systems), greenhouse gas emissions (GHG plan consistency), wildland fires/fire protection services (wildland fires and fire protection services), land use (plan consistency), recreation (recreation plan consistency), and transportation/traffic (vehicular hazards, plan consistency, and parking). This Alternative would not result in any impacts greater than those under the proposed Project.

(3) Relationship of the Alternative to Project Objectives

The ability of Alternative B to meet the stated goals and objectives of the Project is summarized below in Table 5-2. As summarized in Table 5-2, Alternative B would at least partially meet many of the Project's goals and objectives, but would not achieve all goals and objectives to the extent the Project would.

c. Alternative C – Reduced Trail Network Alternative

The Reduced Trail Network Alternative would represent a reduced intensity project that would only include TSMP improvements within the Town's UGB, and therefore would not implement any improvements located outside the UGB, including all SHARP project improvements and other improvements within USFS jurisdiction. All improvements under this Alternative would be implemented according to the proposed TSMP for components within the Town's UGB, similar to the proposed Project.

(1) Environmental Impact Categories

(a) Aesthetics

Under the Reduced Trail Network Alternative, the proposed Project would be partially implemented, but would be limited in terms of geography and intensity of improvements. Under this Alternative, temporary construction activities and operation of permanent improvements would result in less than significant impacts to scenic vistas and other scenic resources in the Project Area, but to a lesser extent than the Project given the reduction in number and intensity of improvements and limitation of improvements to within the Town's UGB. Similarly, this Alternative would result in reduced impacts to visual quality and character during construction relative to the Project, though mitigation measures would still be required to reduce impacts to less than significant. Operational impacts regarding visual quality and character would be less than significant and less than the Project. Due to the reduction in number and intensity of proposed improvements under this Alternative, light and glare impacts would also be reduced, and would be less than significant.

(b) Air Quality

Implementation of Alternative C would entail the construction of all of the improvements within the Town's UGB per the proposed Project, but no improvements outside the UGB, and therefore would represent an incremental reduction in intensity of development and usage of proposed facilities relative to the proposed project. This incremental reduction in trail and other facilities under this Alternative would result in a proportionate reduction in air pollutant emissions associated with construction and operation of proposed

facilities. Therefore, localized and regional construction emissions impacts, as well as operational emissions impacts, would be reduced relative to the proposed Project, though mitigation measures would still be required to reduce construction-related impacts to less than significant. Given the reduction in overall emissions, impacts related to AQMP consistency would also be less than significant, similar to the proposed Project. By not building a trail network as extensive as the proposed Project, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular emissions and associated improvement in long-term air quality.

(c) Biological Resources

The Reduced Trail Network Alternative would result in similar TSMP improvements within the Town's UGB as under the proposed Project, but would be reduced due to the omission of trail improvements outside the Town's UGB and the associated intensity of construction activities and operational utilization. Therefore, the implementation of this Alternative would have a reduced potential to adversely affect sensitive species and habitats (including wetlands) due to fewer construction activities relative to the proposed project. Similarly, operation of proposed facilities under this Alternative would result in incrementally reduced trail and other facility usage by the community, and therefore operational effects on biological resources would be less than the proposed Project. Additionally, the reduction in construction activities and operational intensity within the Project Area would result in fewer impacts regarding wildlife corridors and conflicts with local ordinances protecting biological resources relative to the Project. However, similar to the proposed Project, this Alternative would not result in any impacts associated with habitat conservation plans.

(d) Cultural Resources

Alternative C would implement a number of trail and other recreational facility improvements within the Project Area, but would include incrementally fewer construction activities given the lack of proposed development outside the Town's UGB. Accordingly, given the reduction in construction intensity and associated ground disturbance, the potential for adverse impacts to archaeological and paleontological resources, including human remains, would be incrementally reduced relative to the Project, though mitigation measures would still be required to reduce the significance of these impacts. Likewise, based on the reduction in proposed improvements and associated construction activities under this Alternative, impacts related to historic resources would also be proportionately reduced, though mitigation measures would still be required to reduce impacts to less than significant.

(e) Geology and Soils

Alternative C would result in the implementation of trail and other recreational facility improvements within the Project Area, but to a lesser degree than the Project given that only improvements within the Town's UGB would b implemented. Therefore, this Alternative would expose fewer people and structures to hazards associated with seismic ground shaking and seismic-related ground failure, and these impacts would be less than the Project and less than significant. Similarly, impacts related to landslides, soil erosion/loss of topsoil, and geologic stability would be incrementally reduced compared to the Project, but mitigation would still be required to reduce impacts to less than significant. However, similar to the proposed Project, impacts related to alternative wastewater disposal systems would be less than significant.

(f) Greenhouse Gas Emissions

This Alternative would result in reduced construction activities and less intense trail and other recreational facility usage relative to the Project, and therefore its implementation would be expected to generate incrementally fewer GHG emissions. Based on the overall reduction in construction and operational GHG emissions under this Alternative, impacts in this regard would be less than the proposed Project and would be less than significant. However, as is the case with the Project, this Alternative would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than significant. By not building a trail network as extensive as the proposed Project, opportunities for vehicular trips to be replaced by trips by foot and bicycle would be reduced, which would potentially reduce any offsetting reduction in vehicular-related GHG emissions ,

(g) Wildland Fires/Fire Protection

The reduction in overall trail and other recreational facility usage under the Reduced Trail Network Alternative would have a proportionate effect on wildland fire potential associated with operation of proposed facilities. With the reduction in trail and recreational facility usage within and near wildland areas, particularly given the lack of proposed improvements outside the Town's UGB, wildland fire hazard impacts would be less than the Project, though mitigation would still be required to reduce impacts to less than significant. Additionally, this Alternative would result in a reduction in demands for fire protection services compared to the Project, and impacts would be less than significant in this regard.

(h) Hydrology and Water Quality

Implementation of Alternative C would entail fewer improvements than those included under the proposed Project, and as such this Alternative would result in reduced construction activities and operational intensity within the Project Area. Therefore, Alternative C would require less earthwork and would have a reduced potential to result in adverse water quality effects during construction activities, and would also have a lower potential to contribute to impacts to receiving water bodies or other sensitive resources during project operations. Although this Alternative would have a reduced potential to result in adverse water quality impacts, mitigation measures would still be required to address construction and operation of proposed facilities and reduce impacts to less than significant. Similarly, the reduced intensity of construction and operation under this Alternative would result in fewer impacts regarding drainage patterns and flooding potential relative to the Project; impacts would be less than significant, though mitigation would still be required to reduce flooding impacts to less than significant.

(i) Land Use and Planning

This Alternative would implement the proposed TSMP but would omit all other proposed improvements located outside the Town's UGB. While this Alternative may require incidental approvals for specific improvements (e.g,, Conditional Use Permits), such approvals would be similar to those required for the proposed Project, which would also require approval of the TSMP itself in addition to incidental permits and other approvals. This Alternative would not conflict with any applicable plans, policies, or regulations affecting the Project Area. As such, impacts would be less than significant and similar to the proposed Project.

(j) Noise

As noted previously, this Alternative would result in incrementally reduced construction and operational intensity relative to the proposed Project. Accordingly, noise and vibration effects associated with the proposed improvements would be incrementally reduced compared to the Project. Construction activities would still require mitigation measures to reduce temporary noise impacts to less than significant, but operational noise, and construction and operational vibration effects, would be less than significant.

(k) Recreation

Alternative C would result in the improvement of various trails and other recreational facilities within the Project Area, but to a lesser extent than under the proposed Project given that improvements would be limited to those within the Town's UGB. The proposed improvements would serve to increase the usability and safety of existing facilities and improve overall connectivity within the Town, but would not be expected to result in the deterioration of parks and recreational facilities, as their use would not be substantially greater than under existing conditions. Given that the proposed Project would result in less than significant impacts in this regard, this Alternative would also result in less than significant impacts, but would be incrementally reduced relative to the Project. Additionally, Alternative C would not result in conflicts with existing plans regarding parks and recreational facilities, similar to the proposed Project.

(l) Transportation/Traffic

Potential transportation impacts associated with Alternative C, the buildout of the proposed TSMP improvements within the Town's UGB, are evaluated qualitatively below.

Traffic Impacts

The TSMP proposes to add several miles of MUP trails within the Town's UGB, provide a limited number of new and improved soft-surface trails (boardwalk and private dirt path), and improve the trail connectivity throughout Town. This is expected to increase the portion of trips made in Mammoth via non-auto modes during the non-winter months. Additionally, the portion of MUP users driving to/from the trails would generally decrease, as the MUP would be easier to access from the various neighborhoods by non-auto means. Conversely, the improved trail system and facilities could increase the number of persons using the trails and facilities, which could increase the number of vehicle-trips occurring over the course of a busy day, as trail users drive to and from trailheads.

Implementation of Alternative C could conservatively generate an incremental increase in vehicle trips throughout the Town during the busiest summer hour of trail use. It is conservatively assumed that the busiest hour of trail use coincides with the summer peak hour of traffic activity in Mammoth, which generally occurs on weekend afternoons. As the project-generated trips would be distributed to the various trailhead locations, no significant Town-wide traffic impacts are expected to result. Overall, provision of the additional pedestrian and bicycle facilities provided within the Town's UGB under the proposed TSMP would result in a general increase in non-auto travel, which would offset the increase in vehicle trips to some degree. No significant impact on traffic operations during the summer season is anticipated. Alternative C is not expected to cause intersection and roadway conditions to exceed adopted standards.

In comparison with the proposed Project, Alternative C would result in a smaller increase in vehicle trips during the summer season, and therefore summer traffic impacts would be less than the proposed Project.

Winter Traffic Impacts

Implementation of Alternative C could generate an incremental increase in vehicle trips throughout Town during the busiest winter hour of trail use. It is conservatively assumed that the busiest hour of trail use coincides with the winter peak hour of traffic activity in Mammoth, which generally occurs between 4:00 PM and 6:00 PM. As the project-generated trips would be widely distributed, no significant traffic impacts would result from Alternative C in the winter season. Alternative C is not expected to cause intersection and roadway conditions to exceed adopted standards. In comparison with the proposed Project, Alternative C would result in a smaller increase in vehicle trips during the winter season, and therefore winter traffic impacts would be less than the proposed Project.

Traffic Impacts During Construction

Traffic impacts due to the construction phases of Alternative C are also considered. Long-term roadway closures are not expected to occur during construction of the proposed improvements. Construction activities may occur at multiple locations concurrently; however, any potential transportation impacts associated with the project construction activities at any one time are expected to be modest. Project-specific construction management plans would be analyzed for each project location as well, similar to the proposed project. However, given that the number and intensity of construction projects under this Alternative would be substantially reduced, construction-related traffic impacts would be less than under the proposed Project.

Impact on Vehicle-Miles Traveled

The impact of the 1991 TSMP on Vehicle-Miles Traveled (VMT) is evaluated for both summer and winter conditions. The effect of the proposed project on VMT in Mammoth is dependent on the total trip generation and the length of these vehicle trips.

Summer Vehicle-Miles Traveled

Implementation of Alternative C is not expected to increase the number of persons visiting the Mammoth area from other communities or other regions on a busy summer day, as world-class hiking trails are already provided in the Mammoth area. Although there may be a net increase in trail activity associated with the proposed trail improvements, new trail networks would be provided in the urbanized area, which would result in relatively short vehicle trips. Some trips that are currently made to trails outside the urbanized area would shift to the new trails in or near the urbanized area. This would result in a reduction in the average trip length associated with the trails, thereby reducing total VMT.

The increase in VMT generated by the increase in vehicle trips associated with the new trails is expected to be roughly offset by the reduction in VMT resulting from the provision of trails near the urbanized area and the increase in non-auto mode travel throughout Town. Overall, Alternative C is not expected to result in a

significant increase in VMT over the course of a summer day, and impacts would be less than under the proposed Project.

Winter Vehicle-Miles Traveled

Similar to summer conditions, implementation of Alternative C is not expected to significantly increase the number of persons visiting the Mammoth area from other communities or other regions on a busy winter day, as the existing trails already serve those wishing to recreate. Although there may be a net increase in trail activity associated with the proposed trail improvements, new trail networks would be provided in the urbanized area, which would result in relatively short vehicle trips. Some trips that are currently made to trails outside the urbanized area would shift to the new trails in or near the urbanized area. This would result in a reduction in the average trip length associated with the trails, thereby reducing total VMT.

The increase in VMT generated by the increase in vehicle trips associated with the new trails is expected to be roughly offset by the reduction in VMT resulting from the provision of trails within the urbanized area and the increase in non-auto mode travel throughout Town. Overall, Alternative C is not expected to result in a significant increase in VMT over the course of a winter day, and impacts would be less than under the proposed Project.

It is worth noting that the increase in traffic volumes resulting from Alternative C would be highest during the summer season, which does not coincide with the peak season of traffic activity in the Mammoth area (traffic volumes in Mammoth are generally highest in the winter season).

Driver Sight Distance

Driver stopping sight distance was reviewed at the at-grade MUP crossing locations included under Alternative C. In general, adequate driver sight distance is expected to be provided, with the exception of one crossing location. There is an existing safety deficiency at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road. The stopping sight distance provided for drivers traveling northbound along Majestic Pines Drive is limited by the horizontal curvature along the roadway and the existing embankment and vegetation. A detailed evaluation is included in the existing conditions chapter of the Project traffic study (included as Appendix I of this EIR). As Alternative C is expected to result in an increase in the number of MUP users at this location, it would therefore exacerbate the existing safety deficiency. This is considered to be a significant impact; however, it is recommended that the proposed improvement plans be modified to provide at least 150 feet of stopping sight distance for northbound drivers approaching this crossing. This could be accomplished by modifying the MUP trail alignment and/or modifying the existing landscaping and embankment. With this measure, adequate driver sight distance would be provided, and impacts would be less than significant, as is the case under the proposed Project.

Trail Crossing Conditions

Trail crossing conditions are discussed under the proposed project alternative. In general, adequate crossing conditions are expected to be provided under Alternative C, with the exception of the driver sight distance concern discussed above. Alternative C is not expected to result in a significant impact on trail crossing conditions at the remaining trail crossings, similar to the proposed project.

Consistency of Alternative C With Other Planning Documents and Studies

The project's consistency with the following documents is evaluated:

- Main Street South Frontage Road Project and Promenade Walkway
- Main Street Signal Feasibility Study
- Caltrans SR 203 Transportation Concept Report
- Minaret Road Alignment Study
- Mobility Plan

Main Street South Frontage Road Project and Promenade Walkway

No inconsistencies with Alternative C are identified, as promenade components are already incorporated into the proposed Project for improvements within the Town's UGB, and therefore promenade improvements would be implemented under this Alternative.

Main Street Signal Plan Feasibility Study

No inconsistencies with Alternative C are identified.

SR 203 Transportation Concept Report

No inconsistencies between the Caltrans SR 203 Transportation Concept Report (TCR) and Alternative C are identified.

Minaret Road Alignment Study

No inconsistencies are identified between the Minaret Alignment Study and Alternative C.

General Bikeway Plan

No inconsistencies are identified between the General Bikeway Plan and Alternative C.

Mobility Plan

No inconsistencies are identified between the Mobility Plan and Alternative C.

Parking Impacts

The impact of Alternative C on parking demand during summer and winter conditions is estimated, and conclusions and recommendations are made regarding overall parking conditions.

Summer Parking Demand

Alternative C would add several miles of MUP trails, provide limited new and improved soft-surface trails (boardwalk and private dirt trail), and improve the trail connectivity throughout Town. This is expected to increase the portion of trips made in Mammoth via non-auto modes during the non-winter months. Additionally, the portion of MUP users parking at the trailheads would generally decrease, as the MUP would be easier to access from the various neighborhoods by non-auto means. Conversely, the improved trail system and facilities could increase the number of persons using the trails and facilities, which could increase the parking demand occurring over the course of a busy day, as trail users park at trailheads.

Implementation of Alternative C could conservatively generate an incremental increase in parking demand throughout the Town during the summer peak hour. As this demand would be distributed to the various trailhead locations, no significant parking impacts are expected to result at any one location. Overall, provision of the additional pedestrian and bicycle facilities included in Alternative C would result in a general increase in non-auto travel, which would offset the increase in parking demand to some degree. While additional parking at some locations within the Town's UGB may ultimately be recommended to provide additional supply for various improvements, overall parking demand under this Alternative would be less than under the proposed Project, and impacts would be less than significant.

Winter Parking Demand

As described above, the additional segments of non-motorized groomed trails assumed in Alternative C are expected to generate an incremental increase in vehicles parking during the peak hour. In addition, a limited number of parking spaces are estimated to be generated by potential motorized groomed trails during the winter peak hour. The total increase in winter parking demand has not been determined for Alternative C; however, it is recommended that additional winter parking spaces be provided as a part of Alternative C, as deemed appropriate or necessary by the Town.

Conclusion

Access to recreational facilities over the course of a peak day is typically limited by the amount of parking available. As Alternative C does not specify the number of additional parking spaces, if any, that are included in the TSMP for improvements within the UGB, this is a potentially significant impact. However, with provision of the recommended number of additional parking spaces, as determined by the Town of Mammoth Lakes, Alternative C would provide adequate overall parking conditions, as is the case with the proposed Project.

Interface between Trail System and Transit System

The locations of existing and proposed transit facilities are reviewed with respect to existing and proposed trailhead locations. Transit service is considered to access a trailhead if a bus route is located within one-quarter mile of the trailhead. Some existing trailheads in Mammoth are located more than one-quarter mile away from the existing bus routes. No additional bus/trolley service is included in Alternative C. However, as Alternative C would not decrease the performance or safety of transit facilities, this is not considered to be a significant impact.

Future Cumulative Conditions

As discussed above, Alternative C would not significantly change traffic volumes at any one location. Although traffic volumes in Mammoth are generally expected to increase in the future, Alternative C is not expected to result in a significant impact on traffic operations under future cumulative conditions. Regarding trail crossings, Alternative C includes an at-grade MUP crossing where the existing MUP terminates at a point on Minaret Road approximately 150 feet to the north of its intersection with Old Mammoth Road. If a roundabout is installed at the Minaret Road/Old Mammoth Road intersection in the future, it is recommended that the at-grade MUP trail crossing be relocated to the splitter island. With this measure, adequate trail crossing conditions are expected to be provided.

Summary of Recommendations for the Reduced Trail Network Alternative

The following recommendations are made regarding driver sight distance, parking, and under the Reduced Trail Network Alternative:

- The TSMP improvements plans for components within the Town's UGB should be modified to provide at least 150 feet of stopping sight distance for northbound drivers approaching the MUP crossing on Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road. This could be accomplished by modifying the MUP trail alignment and/or modifying the existing landscaping and embankment. With this measure, adequate driver sight distance would be provided.
- Additional summer and winter parking spaces should be provided under Alternative C as deemed appropriate or necessary by the Town of Mammoth Lakes. With this measure, adequate overall parking conditions would be provided.

Traffic/Transportation Impact Summary

Overall, Alternative C would result in fewer changes to the existing traffic system and would have reduced adverse effects on traffic patterns, levels of service, or availability of parking. Therefore, traffic and parking impacts are less than under the proposed Project, as less additional traffic would be generated under this Alternative. However, recommended improvements regarding adequate driver sight distance at the MUP crossing along Majestic Pines Drive between Meridian Boulevard and Monterey Pine Road would still be required to reduce the significance of impacts, similar to the proposed Project.

(2) Impact Summary

A comparative summary of the environmental impacts associated with the Reduced Trail Network Alternative with the environmental impacts anticipated under the Project is provided in Table 5-1. As summarized in Table 5-1, Alternative C would result in less impacts regarding aesthetics (scenic vistas, scenic resources, visual character and quality, and light and glare), air quality (localized and regional construction emissions and operational emissions), biological resources (sensitive species, sensitive habitats, wetlands, wildlife corridors, and local ordinances protecting biological resources), cultural resources (historic resources, archaeological resources, paleontological resources, and human remains), geology and soils (landslides, soil erosion/loss of topsoil, and geologic stability), greenhouse gas emissions (GHG emissions), hydrology and water quality (water quality, drainage patterns, and flooding), noise

(construction and operational noise and vibration), recreation (parks and recreational facilities), and transportation/traffic (traffic and vehicle miles traveled). This Alternative would also result in similar impacts regarding air quality (AQMP consistency), biological resources (habitat conservation plans), geology and soils (seismic ground shaking, seismic-related ground failure, and alternative wastewater disposal systems), greenhouse gas emissions (GHG plan consistency), wildland fires/fire protection services (wildland fires and fire protection services), land use (plan consistency), recreation (recreation plan consistency), and transportation/traffic (vehicular hazards, plan consistency, and parking). Alternative C would not result in any impacts greater than those under the proposed Project.

(3) Relationship of the Alternative to Project Objectives

The ability of Alternative C to meet the stated goals and objectives of the Project is summarized below in Table 5-2. As summarized in Table 5-2, Alternative C would not meet several of the Project's goals and objectives, and would not achieve the majority of the remaining goals and objectives to the extent the Project would.

d. Environmentally Superior Alternative

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The *CEQA Guidelines* also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this EIR, the range of feasible alternatives to be considered includes Alternative A, the No Project/No Development Alternative; Alternative B, the No Project/Existing Trails Plan Alternative; and Alternative C, the Reduced Trail Network Alternative.

A comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project is provided in Table 5-1, while a summary of the ability of each alternative to meet the project goals and objectives is provided below in Table 5-2. A more detailed description of the potential impacts associated with each alternative is provided above. Based on the evaluation of impacts presented above, and the findings regarding each Alternatives' ability to meet the Project's stated goals and objectives summarized in Table 5-2 below, Alternative C, the Reduced Trail Network Alternative, is determined to be the environmentally superior Alternative. Alternative C would result in incrementally reduced impacts relative to the proposed Project, as proposed improvements would be limited to those within the Town's UGB, and would at least partially meet all of the TSMP goals and objectives, though not to the extent that the proposed Project would. Furthermore, while Alternative C would fail to meet any of the goals for the SHARP projects, as all improvements under this Alternative would be limited to the Town's UGB, the SHARP goals would not be applicable to the Reduced Trail Network Alternative.

Table 5-2

Alternatives' Ability to Meet Project Goals and Objectives

Project Goal/Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative A No Project/No Development	Alternative B No Project/ Existing Trails Master Plan	Alternative C Reduced Trails Network
Goal 1: Develop a plan for an integrated year-round trail network that provides for a seamless transition between the Town of Mammoth Lakes, the Mammoth Mountain Ski Area, and the surrounding federal lands (USFS).	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Partially Meets Goal
Objective 1.1: Identify improvements for signage, wayfinding and amenities throughout the existing network.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 1.2: Close gaps in the existing network.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 1.3: Expand the network within the Urban Growth Boundary to provide access to new destinations, activities and experiences from both public and private property.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective
Objective 1.4: Identify locations for potential recreation nodes and public access easements that will enhance connections between Town and surrounding public lands for summer and winter recreation.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective
Objective 1.5: Identify preferred summer and winter uses for each segment in the network.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Objective 1.6: Provide design guidelines that will minimize user conflicts, provide for sustainability, and reduce maintenance needs.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective

Table 5-2 (Continued)

Alternatives' Ability to Meet Project Goals and Objectives

Project Goal/Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative A No Project/No Development	Alternative B No Project/ Existing Trails Master Plan	Alternative C Reduced Trails Network
Objective 1.7: Provide uniform signage and wayfinding along the network and at all recreation nodes.	Fully Meets Objective	Does Not Meet Objective	Partially meets objective	Fully Meets Objective
Goal 2: Develop a plan that enhances mobility in a way that is consistent with the Town's "Feet First" strategy.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Partially Meets Goal
Objective 2.1: Identify necessary improvements to improve pedestrian safety, convenience and comfort.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Objective 2.2: Update the General Bikeway Plan and develop an on-street bikeway network that enhances bicyclist safety, convenience and comfort.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective
Objective 2.3: Ensure that pedestrians and bicyclists can access the public transit system safely, conveniently and comfortably; and that public transit serves all key recreation nodes.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Objective 2.4: Provide the information necessary for residents and visitors to navigate around town on foot, bicycle and transit.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Goal 3: Create a plan that clearly identifies the projects and programs necessary for implementation.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Objective	Fully Meets Objective

Table 5-2 (Continued)

Alternatives' Ability to Meet Project Goals and Objectives

Project Goal/Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative A No Project/No Development	Alternative B No Project/ Existing Trails Master Plan	Alternative C Reduced Trails Network
Objective 3.1: Provide specific lists of projects that the Town of Mammoth Lakes can incorporate into the Capital Improvement Program. Complete the near-term projects identified in the Trail System Master Plan in the next two years.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
SHARP Goal 1: Avoid potential user conflicts while locating recreation facilities appropriately.	Fully Meets Goal	Does Not Meet Goal	Fully Meets Goal	Fully Meets Goal
SHARP Goal 2: Achieve low overall impact by improving or better defining what is already present.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal
SHARP Goal 3: Provide for a coherent and satisfying recreation system that includes appropriate signage and wayfinding.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal
SHARP Goal 4: Ensure that trails and facilities have minimal visual impact and blend with the natural environment and each other.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal
SHARP Goal 5: Identify opportunities to enhance connectivity and public safety.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal
SHARP Goal 6: Further wildlife and resource protection, sustainability, and stewardship.	Fully Meets Goal	Does Not Meet Goal	Does Not Meet Goal	Does Not Meet Goal

Table 5-2 (Continued)

Alternatives' Ability to Meet Project Goals and Objectives

Project Goal/Objective		Ability to Meet Project Goal/Objective			
		Proposed Project	Alternative A No Project/No Development	Alternative B No Project/ Existing Trails Master Plan	Alternative C Reduced Trails Network
SHARP Goal 7:	Achieve practical solutions.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal
SHARP Goal 8:	Maintain opportunities for wildlife observation and interaction.	Fully Meets Goal	Does Not Meet Goal	Partially Meets Goal	Does Not Meet Goal