
IV. ENVIRONMENTAL IMPACT ANALYSIS

H. LAND USE & PLANNING

ENVIRONMENTAL SETTING

Project Site and Surrounding Land Uses

The approximate 237-acre Project site is located just inside the southeastern boundary of the Town at the foot of the Sherwin Range, a steep extension of the Sierra Nevada with elevations up to 11,728 feet. The Project site is comprised of the following Assessor's Parcel Numbers (APN) and associated land use areas shown in parenthesis: 40-040-20 (Area A), 40-070-10 (Area J & G), 40-070-11 (Area B-F, H & K), 40-070-12 (Area I), 40-070-13 (Area I), 40-070-23 (Area I), 40-140-04 (Area I & L), and 40-140-05 (Area I), (refer to Figures II-1 through II-3 in Section II, Environmental Setting, of this Draft EIR).

The Project site is a portion of the approximate 440-acre Snowcreek Master Plan area, including 94 acres outside the 1981 Master Plan boundary that are also included as part of the golf course expansion. The Project site consists of the undeveloped portions of the Snowcreek Master Plan area and an existing privately owned publicly accessible nine-hole golf course west of Fairway Drive. Except for the existing golf course, the Project does not include the remainder of the existing Snowcreek Master Plan area within which development has either occurred or is currently in progress. Existing/entitled developments that are not part of the Project site include the residential areas of Snowcreek I, II, III, IV, V, VI and VII, and the Snowcreek Athletic Club (refer to Table III-1 in Section III, Project Description, of this Draft EIR).

The Project site is primarily undeveloped, with the exception of the following existing uses: an existing privately owned publicly accessible nine-hole golf course located west of Fairway Drive, a public golf driving range located east of Fairway Drive, and the Snowcreek Investment Company L.P. offices and Snowcreek sales and marketing office located along Fairway Drive, both of which are considered temporary facilities. The Inyo National Forest Service administrative site (i.e., tack room and storage facilities) currently located on far eastern edge of the Project site are in the process of being relocated to United States Forest Service (USFS) land east of Sherwin Creek Road.

The Project site is primarily bounded to the east by Sierra Meadows Ranch, to the south and east by Inyo National Forest lands, to the north and west by Snowcreek development and other residential developments. Surrounding 1987 General Plan land use designations include High Density Residential (HDR), Low Density Residential (LDR), Institutional/Public Facilities (IP), Open Space/Stream Corridor (OSSC), and Resort (R). These are consistent with the land uses in the Draft 2007 General Plan with the exception of the IP designation. Surrounding zoning designations include Residential Single Family (RSF), Mobile Home Park (MHP), Residential Multi-Family 2 (RMF-2), Resort (R), and Open Space Stream Corridor overlay (OSSC) (refer to Figure II-4 through Figure II-8).

Land Use Designation and Zoning

Town of Mammoth Lakes 1987 General Plan

California State Government Code Section 65300 requires each county and city, including charter cities, to adopt a comprehensive General Plan which should be integrated and internally consistent with a compatible statement of goals, objectives, policies and programs to provide for a decision-making basis on physical development. The Project site falls within the jurisdiction of the Town of Mammoth Lakes General Plan (General Plan). The General Plan was adopted in October 1987 and was designed to promote the public health, safety and general welfare of the community. The 1987 General Plan consists of seven elements, including: 1) Land Use and Public Facility; 2) Transportation and Circulation; 3) Housing; 4) Conservation and Open Space; 5) Safety; 6) Noise and 7) Parks and Recreation (adopted in 1991).

According to the 1987 General Plan, the Project site is currently designated Resort (R), Open Space (OS) and Open Space Stream Corridor (OSSC). Table IV.H-1 depicts the allocation of land uses on the Project site in relation to onsite APNs.

In the 1987 General Plan, Resort use is characterized with primary emphasis to visitor lodging, amenities and services. Development in the Resort designation is generally applied to large parcels and is physically connected internally and to all primary visitor oriented destinations with an integrated system of streets, sidewalks, and recreational paths. This designation includes mixed visitor oriented uses including lodging, visitor oriented commercial, and recreation uses. Maximum housing densities range between six units per acre and eight units per acre. Development standards are similar to those for equivalent uses in other designations. Lot coverage is limited to 50 percent of the overall Project area to provide space for outdoor recreation amenities.

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

As previously discussed in the Section II (Environmental Setting) and Section III (Project Description) The area designated as Open Space on the Project site was transferred to private ownership in 2005 by means of a land exchange (2005 Land Exchange) between the United States Forest Service (USFS) and Snowcreek Investment Company in order to acquire enough land for a nine-hole addition to create an 18-hole golf course. After the 2005 Land Exchange, Snowcreek Investment Company entered into a covenant with the Town that protected the exchange parcel from being developed with residential housing, commercial lodging, transient occupancy, and from being further subdivided as this land is outside the Town's Urban Growth Boundary. The covenant was initiated as a part of the exchange

process, and is monitored by the Eastern Sierra Land Trust. The conditions of the land exchange covenant are described in further detail below. (see Appendix K of this Draft EIR)

The 1987 General Plan policies applicable to the Project are discussed further below in the Environmental Impacts section in Table IV.H-2.

**Table IV.H-1
Existing Land Use and Zoning On Site**

APN	Area (acres)	Legal	General Plan Land Use	Zoning
40-040-20	15.6	Lot 2 of Tract 36-236A per map recorded in Book ___ of Tract Maps at Page ___ in the office of the County Recorder, Mono County, Calif. (pending)	Resort	Resort, Open Space Stream Corridor overlay
40-140-05 ¹ 40-140-04 ¹	94	Tract 46 and 47, Sec. 2, T.4 S., R.27 E., M.D.M., Mono County, Calif.	Open Space	Open Space
40-070-23	56.41	Lot Line Adjustment Parcel 2 of Lot Line Adjustment 2003-06 per Certificate of Compliance recorded as Document #2003011728 in the office of the County Recorder, Mono County, Calif.	Resort	Resort
40-070-10	6.66	Lot 3 of Tract No 36-166 per map recorded in Book 10 of Tract Maps at Page 21 in the office of the County Recorder, Mono County, Calif.	Resort	Resort
40-070-11	52.74	Lot 4 of Tract No 36-166 per map recorded in Book 10 of Tract Maps at Page 21 in the office of the County Recorder, Mono County, Calif.	Resort	Resort
40-070-12	0.39	Lot 6 of Tract No 36-166 per map recorded in Book 10 of Tract Maps at page 21 in the office of the County Recorder, Mono County, Calif.	Resort	Resort
40-070-13	6.28	Lot 5 of Tract No 36-166 per map recorded in Book 10 of Tract Maps at Page 21 in the office of the County Recorder, Mono County, Calif.	Resort	Resort

¹ Subject property in 2005 Land Exchange (see discussion below).

Town of Mammoth Lakes 2007 Draft General Plan

The 1987 General Plan is currently in the process of being updated following a four-year planning and review process. A Draft Program EIR was previously prepared and circulated regarding an earlier version of the General Plan Update. A Notice of Preparation (NOP) for the Draft Program EIR was distributed on April 25, 2003. A Draft Program EIR was prepared and distributed to the public for review from February to May 2005 for public comments. Based on the extent and range of comments received, the Town determined that the proposed General Plan should be revised to the extent that required recirculation of a Revised Draft Program EIR. The Revised Draft Program EIR was circulated for public review from October 31, 2005 to December 14, 2005. The Town adopted the Draft 2007 General Plan on August 15, 2007 and is currently considering the Revised Final Program EIR on the General Plan Update for certification. The 2007 General Plan consists of nine elements, including: 1) Economy; 2) Arts, Culture, Heritage, and Natural History; 3) Community Design; 4) Neighborhood District Character; 5) Land Use; 6) Mobility; 7) Parks, Open Space, and Recreation; 8) Resource Management and Conservation; and 9) Public Health and Safety.

The 2007 General Plan also designates the Project site as Resort (R) and Open Space (OS). The R designation allows commercial mixed uses including visitor lodging, amenities and services, and workforce housing. Resort developments include recreation, meeting spaces, and commercial services that support the resort atmosphere. The base density is 6 to 8 dwelling units per acre, and 12 to 16 hotel rooms per acre. This designation is generally applied to large parcels capable of providing a complete resort experience as found in the master plan areas of Sierra Star, Snowcreek, and Juniper Ridge. The OS designation is established to protect the community's public and private open space resources. It is intended to preserve existing parks and encourage future parks, maximize recreation opportunities, preserve open space, and protect sensitive environmental resources. Facilities that support the environmental and recreational objectives of the community are permitted. The OS designation may apply to environmentally sensitive areas such as wetlands, floodplains, and streams. This designation allows parks, athletic fields, golf courses, community gathering spaces and supporting facilities. The OS designation also applies to patented mining claims located on the Sherwin Range.

In addition, the 2007 General Plan includes policies in the Neighborhood and District Character Element specifically addressing the Snowcreek District. The 2007 General Plan polices applicable to the Project are discussed further below in the Environmental Impacts section in Table IV.H-3.

Town of Mammoth Lakes Zoning Regulations

The Zoning Ordinance (Mammoth Lakes Municipal Code, Title 17) sets forth provisions governing the use and development standards of land, buildings, and structures in the Town. Some of those development standards address the size of yards abutting buildings and structures, height and bulk of buildings, density of population, number of dwelling units per acre, standards of performance, and other development criteria. The purpose of the Zoning Ordinance is to promote and protect the public health,

safety, and welfare of the people of the Town, to safeguard and enhance the appearance and quality of development of the Town, and to provide for the social, physical and economic advantages resulting from comprehensive and orderly planned use of land resources (Section 17.04.010).

The Project site is zoned Resort (R) and Open Space (OS). Similar to the land use distributions on the site, the portion of the site zoned as OS includes the parcels that were the subject of the 2005 Land Exchange, while the remainder of the site is located within the R zone (see Table IV.H-1, above). In addition, the portion of the Project site located north of Old Mammoth Road (in the Resort zone) also falls within the OSSC (Open Space Stream Corridor) overlay zone. The OSSC zone is set back approximately 25-40 feet from the northern boundary of Old Mammoth Road.

Resort Zone

The Resort Zone is one of eight “special purpose zones” described in the Zoning Ordinance. Special purpose zones are established because of the special or unique land use characteristics with which they are associated and because of the need to implement specific sections of the General Plan (Section 17.28.010). Specifically, the Resort Zone is designed to achieve the following purposes:

- To provide for the classification and development of parcels of land as coordinated, comprehensive projects so as to take advantage of the superior environment which can result from large scale community planning;
- To allow diversification of land uses as they relate to each other in a physical and environmental arrangement, while ensuring substantial compliance with the provisions of this title; and
- To provide for a zone classification encompassing various types of land uses such as: single-family residential developments, multiple housing projects, professional and administrative office uses, hotels including attendant support commercial activities, recreational facilities, public or quasi-public uses, or combinations of such uses through the adoption of a development plan and text materials which set forth land use relationships and development standards. (Ord. 89-05 §1(part), 1989: prior code §19.12.041).

The following general requirements apply to all resort zone properties (Section 17.28.240):

- An application for a zone change to permit the establishment of a resort zone shall include and be accompanied by a development plan for the entire property;
- An application for development of property within a resort zone shall be subject to the approval of a development plan by the planning commission and town council;
- The area contained within a proposed resort zone shall be not less than twenty acres;
- A use permit may be required for any land use designation on the development plan;

- If ambiguity exists as to the specific dimensions or extent of any designated area on the development plan, the specific boundaries shall be set by the filing of a record of survey of the parcel in question in conjunction with the filing of a use permit, tentative subdivision, or parcel map, or construction permits;
- The maximum permissible density for residential uses is eight units per acre;
- Densities for hotel/motel uses shall be computed at a ratio of two guest rooms for each unit;
- The maximum site coverage in the resort zone shall be fifty percent;
- Existing properties located within a resort zone shall not be subdivided unless the subdivision map is in conformance with an approved development plan. (Ord. 00-01 §1(Exh. A(part)), 2000; Ord. 96-01 §1(part), 1996; Ord. 90-06 §1(part), 1990; Ord. 89-05 §1(part), 1989; prior code §19.12.043)

Permitted uses in the Resort Zone include:

- Those uses designated on the development plan for the particular property as approved by the Town council;
- The continuation of all land uses which existed in the zone at the time of adoption of the development plan. Existing land uses shall either be incorporated as part of the development plan or shall terminate in accordance with a specific abatement schedule submitted and approved as part of the development plan;
- Public utility installations;
- Accessory uses and structures incidental to permitted uses;
- Temporary uses as described in Sections 17.32.010 through 17.32.080;
- Those uses outlined in Section 17.28.220(C) subject to a use permit when proposed on parcels having less than twenty acres in area; and
- Fractional-use projects subject to a use permit and the requirements of Section 17.32.200 et seq. (Ord. 04-01 §1(Att. A(part)), 2004; Ord. 89-05 §1(part), 1989; prior code §19.12.042).

As per Section 17.28.250, performance and environmental standards in the resort zone shall be as specified in the development plan or accompanying text but shall be not less than those specified for similar uses in the residential or commercial zones. Also, the development plan shall indicate the design theme for the entire Project; generally the theme shall conform to the requirements of Sections 17.32.120 through 17.32.150. (Ord. 90-06 §1(part), 1990; Ord. 89-05 §1(part), 1989; prior code §19.12.044)

As per Section 17.28.270, the development plan shall consist of maps, plans, reports, schedules, development standards and schematic drawings and such other documents deemed necessary by the planning director in accordance with the following requirements:

- The development plan shall be submitted in a form approved by the planning director and shall be sufficiently detailed to show all intended uses and their location on the property;
- The development of sections or areas within the resort zone may be permitted subject to one of the following or any combination thereof:
 - The uses and requirements of any of the zone classifications established by this title;
 - The uses and standards of development set forth in the development and text as approved and adopted by the town council;
 - Approval of a use permit prior to development;
 - Approval of a tentative subdivision map or parcel map.
- The development plan and any amendment thereto shall include the following:
 - The type and character of buildings or structures and the number of dwelling units per gross acre proposed for each residential area;
 - A statement of the standards of population density for the various proposed residential land uses;
 - The general location of school sites, recreational areas, and other public and semi-public sites and the approximate area of each;
 - The general location of all arterial and collector streets, all transit systems whether surface or aerial and all trails systems coordinated with the transportation and circulation element of the Town general plan.
- The development plan and any amendment thereto shall be accompanied by the following:
 - A general land use map setting forth the proposed uses of all sections or areas within the subject property and the acreage of each;
 - An accompanying text setting forth the land use regulations which constitute the standards of development designed to govern those sections or areas specified in the development plan. Such standards shall contain definitions and information concerning requirements for building site coverage, building heights, building setbacks, off-street parking, vehicular

- access, signing, lighting, storage, screening and landscaping, and any other information which the planning director shall require to ensure substantial compliance with the purpose of the resort zone;
- A topographic map and conceptual grading plan of the property;
 - A preliminary report and overall plan describing proposed provisions for storm drainage, sewage disposal, water supply and such other public improvements and utilities as the Town engineer may require. (Ord. 89-05 §1(part), 1989: prior code §19.12.046)

Open Space Zone

The Open Space zone is also a special purpose zone. Specifically, the Open Space Zone is designed to achieve the following purpose:

- The open space zone is intended primarily to be applied to those areas of the Town where it is desirable and necessary to provide permanent open spaces in conformance with the open space designations of the general plan and to provide for the location and preservation of scenic areas and recreation areas. This zone classification is intended to be applied primarily to lands held under public ownership. (Ord. 89-05 §1(part), 1989: prior code §19.12.061)

Permitted uses in the Open Space Zone include:

- Historical landmarks; and
- Public or private parks and passive recreational facilities.

Additionally, the following uses are permitted subject to a use permit:

- All types of agriculture, horticulture, silviculture and related activities;
- Agricultural experimental facilities;
- Environmental research facilities;
- Flood control facilities;
- Forestry products and the removal thereof; not including processing plants or lumber mills;
- Geothermal exploration/production;
- Riding academies or commercial stables;

- Ski area development;
- Other recreational uses and facilities which satisfy an identified public need; and
- Public utility substations and facilities. (Ord. 90-06 §1(part), 1990: Ord. 89-05 §1(part), 1989: prior code §19.12.062)

In the open space zone, standards of development and performance including parking requirements and standards for signage for those uses requiring a use permit shall be set forth in the conditions of approval. (Ord. 89-05 §1(part), 1989: prior code §19.12.063)

Additionally, no sign or advertising structure shall be permitted except as provided in Chapter 17.40. (Ord. 89-05 §1(part), 1989: prior code §19.12.064)

Open Space/Stream Corridor Protection Zone

A portion of the parcel north of Old Mammoth Road falls within the open space stream corridor (OSSC) overlay zone. The OSSC protection zone is included in the Town's Zoning Code as an overlay or combining zone to protect sensitive stream and drainage courses from development, to recognize and preserve these environmentally sensitive areas as a community resource, and, to protect water quality and preserve wetland habitat. (Ord. 89-05 §1(part), 1989: prior code §19.12.081)

Permitted uses shall be identified by the underlying zone classification; however, in the open space stream corridor protection zone, a use permit shall be required for all uses except for a single-family dwelling on a single lot. Any development rights associated with private property contained within this zone classification may be transferred to other private land holdings subject to the granting of a use permit. (Ord. 90-06 §1(part), 1990: Ord. 89-05 §1(part), 1989: prior code §19.12.082)

The Market/General Store (Store), and Natural Resources and Historic Interpretive Center (Interpretive Center) would be on the already disturbed portion along Old Mammoth Road; an approximately 150 feet deep and 720 feet wide strip. Because this is greater than the approximate 25-40 foot wide Resort zone, it would encroach into the OSSC overlay zone. However, the OSSC overlay does not prohibit development. The development would not go beyond the wetland delineation line verified by the United States Army Corps of Engineers (refer to Figure III-5). A conservation easement may be recorded against the environmentally sensitive property and the land may be transferred to the Town or a conservation group agreeable to both parties which could allow for public access. The Project's compliance with the Clean Water Act (CWA) is discussed in Section IV.D, Biological Resources, of this Draft EIR.

Related Planning Efforts

1974 Snowcreek Master Plan

Dempsey Construction Company, the original developer of Snowcreek, began construction in the area in the late 1970s of the 1974 Snowcreek Master Plan. The Snowcreek Master Plan proposed 2,400 dwelling units on 355 acres (a gross residential density of 6.76 units per acre)¹, 150,000 square feet of commercial space and a one-acre service station site. Three development phases were eventually completed under the 1974 Master Plan consisting of approximately 17 percent of the total number of residential units planned for the Project (refer to Table III-1 and Figure III-1 in Section III, Project Description, of this Draft EIR). An EIR was prepared for the 1974 Master Plan, which was certified by Mono County in 1976.

1981 Snowcreek Master Plan

In 1981, Dempsey Construction Company proposed an updated Snowcreek Master Plan. The 1981 Master Plan included an additional 40-acre parcel at the southern edge of the property that had previously been traded to the USFS in exchange for a 30-acre parcel,² two school sites and one Town site. The 1981 Master Plan reduced the number of proposed dwelling units from 2,400 to 2,332, which, in light of the reduced acreage, had the effect of maintaining the Project density at the same 6.76 units per acre approved in the 1974 Master Plan (refer to Table III-1 in Section III, Project Description, of this Draft EIR). In addition, the 1981 Master Plan included the following changes:

- 2 acres designated as a Catholic church site
- 4.1 acres designated for employee housing
- A site designated for the Snowcreek Athletic Club
- An area designated for the first nine holes of the Snowcreek Golf Course
- Old Mammoth Road was realigned to alleviate hazardous driving conditions
- A roadway was added to provide access to Snowcreek V

An EIR was performed on the proposed 1981 Master Plan. The 1981 EIR emphasized that increased densities were not being requested, and that the mitigation measures adopted in the 1974 EIR to protect environmentally sensitive meadow lands along Mammoth Creek would remain in place.

¹ This consisted of 1,950 residential units, 300 condominium-hotel units and 150 motor in units.

² The 30-acre parcel is identified as Development Area 10 in the 1981 Master Plan (figure 1).

After the EIR was approved, the Dempsey Construction Corporation entered into a Development Agreement with Mono County in 1982. A Development Agreement (DA) is a contract between a local government unit (LGU) and a developer. A DA provides security to both parties. The DA provides the LGU with a legally binding document that the developer would provide infrastructure and/or pay fees required by a new project. The DA provides the developer with a legally binding document that they can build the Project even if the LGU passes a growth-control initiative.

Mono County entered into the DA based on the findings that the 1974 Master Plan would result in the creation of a physical environment that would "...conform to and complement the goals of the community, providing housing, recreational and passive open space, sites for schools and religious worship, create an environment sensitive to human needs and values, and would protect adjacent land uses from adverse impacts." In addition, the County found that the 1974 Master Plan would be "...in the best interests of the County and would provide for orderly growth and development of the area consistent with the County's planning goals and objectives."

The DA required public works improvements, utilities and facilities, and was valid for 20 years. When the Town incorporated in 1984, the Town accepted and adopted the DA (Resolution #84-50). The terms of the DA were not extended after 20 years and the DA expired in 2002.

The 1981 Master Plan added essential public uses, including 0.91 acres of land for the construction of the Mammoth Community Fire District's Fire Station Number 2 and 1.53 acres for a water treatment facility. These properties were made available to the fire and water districts.

Approval of the 1981 Master Plan allowed for the construction of a total of 2,332 dwelling units. To date, 1,145 have been constructed, or are under construction with 1,223 units remaining (refer to Table III-1 and Figure III-1). Subsequent to the approval of the 1981 Master Plan, the following changes were made within the Snowcreek Master Plan area:

- Incorporation of 2.82 additional acres
- Relocation of the workforce housing site to west of Snowcreek Athletic Club and approval of a 4.87 acre Project in that area.

In 2005, an entity of The Chadmar Group purchased Snowcreek Investment Company, which included all the Snowcreek properties, excluding the Snowcreek Athletic Club.

Land Exchange Covenant

As noted above, use restrictions have been imposed on the eastern 94 acres of the Project site as defined in the February 15, 2005 land exchange covenant between the USFS and Snowcreek Investment Company (refer to Figure III-3 in Section III, Project Description, of this Draft EIR). The conditions set forth in the covenant apply only to this portion of the Project site and are as follows:

- The Property shall be used primarily as a golf course. Such use shall include as permitted uses: (1) all uses permitted by and consistent with zoning regulations, rules and ordinances of the Town, and as the same may be amended from time to time; (2) commercial activities permitted by and consistent with the foregoing and related to the operations of a resort recreational golf course, including without limitation (except as restricted by [the covenant]) the following: retail operations, food and beverage, transportation, storage, parking, nordic skiing, alpine skiing and snowboarding and other recreational activities.
- The Property may not be further subdivided where any such subdivision is governed by the California Subdivision Map Act (Government Code §§66410, et seq.), except that Lot Line Adjustments and Parcel Maps are not prohibited by [the covenant]. Lot Line Adjustments shall not result in a net decrease of the land area of the Property. Any parcel map that would be inconsistent with the intention of the parties with regard to the making of [the covenant] or that would result in any condition or circumstance inconsistent with the terms of [the covenant] shall be prohibited.
- There shall be no residential housing units constructed on the Property. The foregoing shall not apply to housing necessary for custodial services, security services, or caretakers necessary in support of the uses permitted by [the covenant]. Such housing shall be attached or adjacent to clubhouse or maintenance facilities and shall be limited to no more than three individual housing units.
- No commercial lodging shall be constructed on the property.
- No unit shall be constructed on the property for transient occupancy purposes as “Transient Occupancy” is defined in Chapter 3.12 of the Town of Mammoth Lakes Municipal Code, and as the same may be amended from time to time.
- The parties retain the right to mutually agree upon additional permitted uses, in addition to that which is set forth elsewhere in [the covenant], for facilities that pertain to arts and cultural activities and forums open to the public; provided that, such uses and facilities are permitted by and consistent with zoning regulations, rules, and ordinances of [the Town], and as the same may be amended from time-to-time.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the *CEQA Guidelines*, the proposed project could have a significant environmental impact if it would:

- (a) physically divide an established community;

- (b) conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; or
- (c) conflict with any applicable habitat conservation plan or natural community conservation plan.

As discussed in the Initial Study that (included as Appendix A to this Draft EIR), no impact would occur with respect to Thresholds (a) and (c). Accordingly, the following discussion focuses on Threshold (b).

Project Characteristics Related to Land Use

The Project consists of adoption by the Town of the Snowcreek VIII, Snowcreek Master Plan Update - 2007 (2007 Master Plan) to revise the Updated Master Plan for Snowcreek at Mammoth (1981 Master Plan). The 1981 Master Plan was an update of the original Snowcreek Master Plan (1974 Master Plan). The 2007 Master Plan addresses proposed buildout of the remaining approximate 237 acres yet to be developed within the Snowcreek Master Plan area (also referred to as "Snowcreek VIII") and is intended to fulfill the vision of the previously approved Master Plans. With the previously adopted Master Plans serving as a basis, Snowcreek VIII is intended to be a well designed community that integrates residential, resort, recreation, retail and public amenities components. Snowcreek VIII would also enhance some existing components of the Snowcreek Master Plan area, such as the expansion of the Snowcreek Golf Course.

As described in detail in Section III, Project Description, of this Draft EIR, the Project proposes the following land uses on the Project site (refer to Figure III-4 in Section III, Project Description, of this Draft EIR):

- **Hotel.** A 400-suite Hotel including 250 Hotel room/suite units and 150 Private Residence Club (PRC)/suite units on APN 40-070-11 in the central portion of the site. The Hotel would include approximately 212,500 square feet of Hotel rooms/suites, 127,500 square feet of Private Residence Club (PRC)/suite units, and 100,225 square feet of back of house/Hotel operations.
- **Condominiums.** The Project would include 850 multi-family townhome units and condominium units on APN 40-070-11 in the central portion of the site. The residential units would range in size from 650 to 3,500 square feet. Housing density for the Project site was calculated by dividing the total number of dwelling units by the total number of acres in the Project. Overall housing density for the Project would be approximately 7.35 dwelling units/acre (1,050/143). Eighty on-site dwelling units would be designated as for-sale workforce housing.
- **Resident's Club.** An 8,000 square foot Resident's Club consisting of a snack bar, pool, spa, fitness facility, kitchen, bar, and outdoor barbeque/cabana would accompany the 850 multi-family condominium and townhome units. This facility would be located in the northern portion of the site near Fairway Drive and would also accommodate the rental office/facility management offices.

- **Golf Course Expansion.** The existing nine-hole golf course on the west and north portions of the Project site would be expanded to include nine additional holes on the east and south edges of the site, creating an 18-hole golf course. The expanded golf course would encompass approximately 155 acres. The course would be designed to conserve water and improve the use of native vegetation. The existing nine-hole course may be modified, and the existing temporary club house located in the northern portion of APN 40-70-11 will be removed. An approximate 3,000 square foot golf pro shop and lounge/grill will be built. The new portion of the golf course and possibly the existing course would be re-graded and contoured to created topographic undulations in character with the surrounding landforms fronting the main range.
- **Golf Pro Shop.** A 3,000 square foot golf pro shop and lounge/grill which would replace the existing temporary club house located in the northern portion of APN 40-70-11.
- **Outfitters' Cabin.** A 1,700 square foot Outfitters' Cabin near the eastern boundary of APN 40-140-04. The Outfitters' Cabin would provide public parking and would serve as the hub of summer and winter activities such as hiking, biking, fishing, cross country skiing, snow-shoeing, hay rides, and sleigh rides. Retail services and equipment rental would be provided to serve these types of activities.
- **Market/General Store (Store), and Natural Resources and Historic Interpretive Center (Interpretive Center).** This portion of the Project would include: a 900 square foot Interpretive Center; a 3,500 square foot Store; and associated surface parking located on a small portion of APN 40-040-20 (the parcel north of Old Mammoth Road and west of Minaret Road).

Project Consistency with Plans and Policies

CEQA requires an analysis of consistency with plans and policies as part of the environmental setting (see *CEQA Guidelines* Section 15125). An EIR uses the policy analysis as an indicator of the resources that might be affected by a project and considers the importance a policy gives a resource in determining the significance of the physical impact. Conversely, the EIR considers the potential significance of the related physical impacts when analyzing a particular policy. Inconsistency with a policy may indicate a significant physical impact, but the inconsistency is not itself an impact. Using this approach, this EIR provides a detailed analysis of policies of the 1987 General Plan, 2007 Draft General Plan, and analyses of other applicable plans (such as the 1981 Master Plan, Air Quality Management Plan, Inyo National Forest Land and Resource Management Plan, and Mono County Local Transportation Commission) and policies so that the decision-makers may determine project consistency. The physical impacts of the Project are analyzed in other sections of the EIR.

The General Plan Guidelines published by the State Office of Planning and Research defines consistency as, "An action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment." Therefore, the

standard for analysis used in the EIR is based on general agreement with the policy language and furtherance of the policy intent (as determined by a review of the policy context). The determination that the Project is consistent or inconsistent with the 1987 General Plan and 2007 Draft General Plan policies or other Town plans and policies is ultimately the decision of the Town.

Town of Mammoth Lakes 1987 General Plan

The current land use designations on the site are Resort, Open Space, and Open Space Stream Corridor overlay. Portions of the site south of Old Mammoth Lake Road are designed Resort and Open Space. The portion of the site north of Old Mammoth Road is designated as Resort (R) with an Open Stream Corridor Overlay (OSSC).

Portions of the site designated as Resort (R) would be developed with a luxury Hotel (including retail uses, restaurant, fitness/wellness center, pool, and ice rink/pond); low-, medium-, and high-density residential uses, Golf Clubhouse, and a Resident's Club. The R designation is generally applied to large parcels capable of providing a complete resort experience. The Project proposes mixed uses consistent with a mountain resort experience, including visitor lodging, recreational amenities, and commercial services that support the resort atmosphere. The Project includes pedestrian paths and walkways linking various residential and commercial land uses throughout the site and provides a functional and distinctive pedestrian-scaled environment. The Project would also provide linkage of Project site trails to the Town-wide recreational trail network. In addition, workforce housing is allowed within the major resort developments. The Project would be consistent with the types of uses proposed in the R designation as described in the 1987 General Plan.

Lot coverage for the R designation is limited to a maximum of 50 percent overall to provide space for outdoor recreation amenities. Lot coverage for the Project would be 24.7 percent for the Project area (minus the Golf Course expansion) or 15 percent for the entire Project, including the Golf Course. Therefore, lot coverage under the Project would be consistent with the R designation. The maximum density is eight units per acre. Densities may be clustered within individual Resort developments. Residential density may be increased pursuant to state law. The Project proposes residential development with a density of 7.35 dwelling units per acre for the Project area and 6.36 dwelling units per acre for the entire Snowcreek Master Plan area. The density would be consistent with the allowable density for the R designation as defined in the 1987 General Plan. Land uses and density proposed by the Project are consistent with the current General Plan designations and the Project would be consistent with the 1987 General Plan land use designation for the Project site.

Portions of the Project site designated as Open Space (OS) would be developed with a golf course and the Outfitters' Cabin. The OS designation is applied to lands that have significant recreational or environmental values and permits development of facilities that support the environmental and recreational objectives of the community and may include recreation facilities such as parks, athletic fields, golf courses, and community gathering spaces. The Project proposes expansion of the Golf

Course, a use which would be consistent with the OS designation as described in the 1987 General Plan. The Outfitters' Cabin would serve as a portal to the many outdoor activities available on public lands south and east of Sherwin Creek Road, including the Sherwin Range. As a portal, the Outfitters' Cabin would provide trail head access, public parking, and would offer equipment for sale/rental for various outdoor activities. The Outfitters' Cabin would serve as the hub of year round off-site activities such as hiking, biking, fishing, cross country skiing, snow-shoeing, hay rides and sleigh rides and would support the recreational objectives of the community and be consistent with the OS designation.

The Market/General Store (Store) and Natural Resources and Historic Interpretive Center (Interpretive Center), proposed north of Old Mammoth Road, would be located on areas designated as R and Open Space Stream Corridor (OSSC) overlay. The development would not go beyond the wetland delineation line verified by the United States Army Corps of Engineers (see Figure III-5 in the Project Description section of this Draft EIR). The OSSC overlay does not prohibit development and the uses allowed would be the same as the underlying designation (R). The Interpretive Center would support the environmental and recreational objectives of the community by educating the public about the natural resources and recreation available in the area. The Store would be similar to the historic Lutz Market, which served the community during the early settlement days of Mammoth Camp. It is intended to serve residents and visitors throughout the "Old Mammoth" area of the Town. Therefore, the Project would be consistent with the R and OSSC land use designations as described in the 1987 General Plan.

Additionally, the Project proposes a 1987 General Plan Amendment to remove the Sherwin Ski Bowl from the Snowcreek Master Plan. If the General Plan Amendment is approved, all uses proposed under the Project would be consistent with the General Plan designations on the site. Project consistency with individual 1987 General Plan policies is evaluated in Table IV.H-2 at the end of this section.

Town of Mammoth Lakes 2007 General Plan

The 2007 General Plan also designates the Project site as Resort (R) and Open Space (OS). The 2007 General Plan allows a density of 6 to 8 dwelling units per acre, and 12 to 16 hotel rooms per acre. The Project proposes residential development with a density of 7.35 dwelling units per acre for the Project area and 6.36 dwelling units per acre for the entire Snowcreek Master Plan area. The density would be consistent with the allowable density for the R designation as defined in the 2007 General Plan. Therefore, the Project would be consistent with the R designation in the 2007 General Plan.

Allowed uses under the OS designation in the 2007 General Plan are the same as defined in the 1987 General Plan. The OS land use designation would be slightly modified in the 2007 General Plan so that all lands within the Town's Urban Growth Boundary (UGB) that were designated OSSC in the 1987 General Plan are combined under the OS designation in the 2007 General Plan.

There is no General Plan amendment required under the 2007 General Plan. Allowed land uses on the Project site are identical between the 1987 General Plan and 2007 General Plan; therefore the Project would be consistent with allowed land uses as described in the 2007 General Plan.

1981 Snowcreek Master Plan

The original 1974 Master Plan proposed development of 2,400 dwelling units on 355 acres, 150,000 square feet of commercial space, and a one-acre service station. Three development phases were completed under the 1974 Master Plan consisting of 17 percent of the total planned number of units. The 1974 Master Plan was updated and revised in 1981. The 1981 Master Plan proposed revisions to the 1974 Master Plan by reducing the number of proposed dwelling units from 2,400 to 2,332, and proposing additional land uses including a church site, employee housing, a nine-hole golf course and athletic club, and roadway improvements.

The Project proposes revisions to the previously adopted 1981 Master Plan. These revisions only address proposed land uses for the remaining 143 acres yet to be developed under the 1981 Master Plan and incorporates the 94 acres from the 2005 Land Exchange for the Golf Course expansion (combined acreage is 237). The Project would complete the build-out of the Snowcreek Master Plan area with complementary land uses that integrate residential, resort, recreation retail, and public amenities on the site. The Project would differ from the 1981 Master Plan by:

- proposing 137 fewer residential units in the overall Master Plan area (345 acres),
- proposing a transfer of un-used density within the Master Plan area to achieve 187 more units in the Project area,
- reducing commercial land uses (from 150,000 square feet to 75,000 square feet), and
- expanding the existing nine-hole Golf Course in place of development of the Sherwin Ski Bowl.

It has been over 25 years since the last update of the Snowcreek Master Plan and changes have occurred economically and demographically in the Town. The proposed changes to the 1981 Master Plan would incorporate shifts in land use based upon recent resort trends and local conditions as well as revisions to the final phase or phases of the 1981 Master Plan. These proposed changes would be consistent with the existing land use designations on the Project site and would be consistent and compatible with uses proposed in the 1981 Master Plan. Therefore, the Project proposes changes to land use that would represent a fine tuning of proposed development to meet needs of the community and would be consistent with the 1981 Master Plan.

Town of Mammoth Lakes Zoning Regulations

The Project proposes two amendments to the Zoning Code– 1) building height for hotel and 2) transfer of un-used density within the master plan area. The current zoning designations on the site are Resort (R) and Open Space (OS). The portion of the site north of Old Mammoth Road is designated as Resort with an Open Stream Corridor Overlay (OSSC).

Portions of the site zoned as R would be developed with a hotel (including retail uses, restaurant, Fitness/Wellness Center, pool, and ice rink/pond); low-, medium-, and high-density residential uses, Golf Clubhouse, and a Resident’s Club. The purpose of the R zone is to provide for the development of parcels as coordinated, comprehensive projects while allowing for diversification of land uses and to allow development of various types of land uses such as: single-family residential developments, multiple housing projects, professional and administrative office uses, hotels including attendant support, commercial activities, recreational facilities, public or quasi-public uses, or combinations of such uses through the adoption of a development plan and text materials which set forth land use relationships and development standards.

Uses permitted under the R zone include the continuation of all land uses which existed in the zone at the time of adoption of the original development plan or those uses designated on the development plan for the particular property as approved by the Town Council. The Project proposes uses that are a continuation of the land uses adopted with the original Master Plans (1974 and 1981). The Project proposes residential development with a density of 7.35 dwelling units per acre for the Project area and 6.36 dwelling units per acre for the entire Snowcreek Master Plan. The maximum permitted density under the Zoning Code is eight dwelling units per acre; therefore the Project would be consistent with the uses and density as allowed under the R zone. Additionally, lot coverage for the Project would be 24.7 percent for the Project area (minus the Golf Course expansion) or 15 percent for the entire Project, including the Golf Course. Therefore, lot coverage under the Project would be consistent with the R zone.

The portion of the site zoned as OS would be developed with the Golf Course expansion and the Outfitters’ Cabin. These uses are consistent with uses allowed in the OS zone and which permits public or private parks, passive recreational facilities, historical landmarks, agricultural activities, ski area development and stables, and other recreational uses and facilities.

The portion of the site designated as R and OSSC would be developed with the Store. Permitted uses in the OSSC are controlled by the underlying designation for the site. Therefore, the Store would be consistent with the underlying OS zoning. Therefore, the Project would be consistent with all permitted zoning uses, including densities as described in the Town’s Zoning Code.

In the R zone, performance and environmental standards are specified in the development plan or Zoning Code, but shall be not less than those specified for similar uses in the residential or commercial zones.

For commercial structures, no portion of any building shall exceed thirty-five feet in height at any point beneath the structure to the roof of the building above that point. However, for any commercial structure where the majority of the ground floor is devoted to understructure parking, the planning commission may approve an increase in height of up to ten feet subject to a use permit. The Project includes understructure parking; therefore, the permitted height is 45 feet. The Hotel height is undetermined at this point, but may not exceed 120 feet in height. Therefore, the height of the Hotel (if in excess of 45 feet) would be inconsistent with the Town's zoning regulations.

Air Quality Management Plan

Mono County, along with Inyo and Alpine Counties, is situated within the Great Basin Valleys Air Basin, which is managed by the Great Basin Unified Air Pollution Control District (GBUAPCD), which serves to enforce Federal, State, and local air quality regulations, and ensure that standards are met. The Town adopted its own Air Quality Management Plan (AQMP) as of November 1990 to provide a means to address increased Particulate Matter (PM) emissions in the winter due to a combination of increased tourism, greater number of motor vehicles, and smoke from wood burning stoves and fireplaces. Of special concern are particles that measure less than 10 microns in diameter (about 1/7th the thickness of a human hair), known as respirable particulate matter (PM₁₀), which can be inhaled and lodge in the lungs. The AQMP analyzes sources of PM₁₀, potential impacts, and the effectiveness of control measures.

Based on the analysis of the Project's impacts on air quality (see Section IV.C, Air Quality), and through compliance with the proposed mitigation measures, Project impacts to air quality during construction would be significant (a temporary impact) and operational impacts would be less than significant and would not result in an increase of particulate matter (PM₁₀). Additionally, modeling of the pollutant emissions associated with the Project shows that the long-term operation of the Project would not result in an exceedance of ozone (O₃) precursor emissions or of the 1-hour or 8-hour Federal or State standards for carbon monoxide (CO). Therefore, the Project would be consistent with both adopted GBUAPCD policies and the Town's AQMP.

Inyo National Forest Land and Resource Management Plan

The California Wilderness Act of 1984 transferred the administration of approximately 23,000 acres of land within the Mono Basin National Forest Scenic Area from the Bureau of Land Management to the Inyo National Forest. The boundary of the Inyo National Forest includes 2,046,346 acres, 116,591 acres of which are in non-federal ownership. Land adjacent to the Urban Growth Boundaries of the Town of Mammoth Lakes is public land falling under the jurisdiction of Inyo National Forest and administered for recreational use. The Sierra Nevada Forest Plan amendment of 2001 updated the Inyo National Forest Plan of 1988, therefore consistency with Forest Service goals and policies will be considered.

Management of natural resources within the Inyo National Forest is being addressed by the U.S. Forest Service through planning efforts including the USFS Trail and Commercial Pack Stock Management in

the Ansel Adams and John Muir Wildernesses FEIS and the Inyo National Forest Winter Needs Assessment prepared in collaboration with the Town of Mammoth Lakes in 2003 and 2004.

The 2007 General Plan, adopted August 15, 2007, includes policies requiring the Town to work closely with agencies, including the Inyo National Forest, to ensure that the regional natural ecosystem is maintained. Therefore, the Project is consistent with the Inyo National Forest Land and Resource Management Plan. This is discussed in more detail in section IV.D (Biological Resources) of this Draft EIR.

Mono County Local Transportation Commission (MCLTC)

The Mono County Local Transportation Commission (MCLTC) is the designated Regional Transportation Planning Agency for Mono County. Its membership includes three members of the Town of Mammoth Lakes Town Council and three members of the County Board of Supervisors. The Director of Caltrans District 9 serves as an ex-officio member of the MCLTC. The MCLTC acts as an autonomous agency in filling the mandates of the Transportation Development Act.

The goal of the Mono County Regional Transportation Plan (Transportation Plan) is to provide and maintain a transportation system which provides for the safe, efficient and environmentally sound movement of people, goods and services, and which is consistent with the socioeconomic and land use needs of Mono County.³ The Transportation Plan includes the existing highway and road system, as well as the bikeway/trail component and air travel.

Senate Bill 45 expanded the role of the MCLTC with additional responsibilities for project monitoring with significant, additional and discretionary funding for transportation projects and increased transportation planning responsibilities. The primary duties of the MCLTC consist of the following:

- Every four years, prepare, adopt and submit a Regional Transportation Plan (RTP), and every two years prepare a Regional Transportation Improvement Program (RTIP) for the Department of Transportation (Caltrans) and the California Transportation Commission;
- Annually, review and comment on the Transportation Improvement Plan contained in the State Transportation Improvement Program (STIP);
- Provide ongoing administration of the Transportation Development Act (TDA) Funds.
- Annually, prepare and submit the Overall Work Program; and

³ *Mono County Local Transportation Commission Website, retrieved July 5, 2006, from http://www.monocounty.ca.gov/cdd%20site/LTC/ltc_home.html.*

- Periodically allocate funds for Transportation Enhancement Activities (TEA).

Although the MCLTC does not currently have any adopted policies, as noted in Section IV.M, Transportation/Traffic, of this Draft EIR, the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation.

Lahontan Regional Water Quality Control Board (LRWCB)

The Mammoth Community Water District (MCWD) provides service to the residents from both surface water appropriated from Lake Mary, and groundwater from the Mammoth Basin Watershed. The MCWD falls under the jurisdiction of the Lahontan Regional Water Quality Control Board (LRWCB), which has developed a Water Quality Control Plan for the Lahontan Region.

Additionally, the MCWD adopted a Groundwater Management Plan in July of 2005, which is thoroughly discussed in the December 2005 update to the Urban Water Management Plan.

The Project would be required to conform to the policies and guidelines concerning land development in the Mammoth Lakes area above 7,000 feet elevation as prescribed in the Water Quality Control Plan for the Lahontan Region (for additional detail, see Section IV.G, Hydrology/Water Quality, of this Draft EIR). Additionally, the Project would further water conservation goals promoted by the MCWD by possibly utilizing the MCWD's tertiary water system when it comes online to satisfy the irrigation needs of the Golf Course, thereby potentially freeing up potable water that could be used to meet other future needs for the Town.

Project Impacts and Mitigation Measures

Impact LU-1 Consistency with Applicable Land Use Plans, Policies, or Regulations

As noted, the Project is generally consistent with and implements applicable plans and policies. The Project site is currently governed by the land use policies and regulations set forth in the General Plan (1987 and 2007 General Plan), the Snowcreek Master Plan (adopted in 1974 and amended in 1981) and the Town of Mammoth Lakes Zoning Ordinance. Table IV.H-2 compares the Project characteristics with the applicable land use polices outlined in the 1987 General Plan.

As noted, the 1987 General Plan is in the process of being updated and a 2007 General Plan was adopted August 15, 2007. Once the General Plan Program Final EIR is certified, the 2007 General Plan would replace the 1987 General Plan as the controlling land use document for the Town's envisioned use of the Project site. For comparative purposes, Table IV.H-3 evaluates the Project's consistency with the applicable land use polices outlined in the current version of the 2007 General Plan (with the exception of policies related to aesthetics and visual resources, which are presented in Section IV.B, Aesthetics).

As discussed in Table IV.H-2 and IV.H-3, the Project would be generally consistent with the applicable policies in the 1987 General Plan, the 2007 General Plan, and Town Zoning Ordinance. Thus, Project impacts to land use would be *less than significant*.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
LAND USE AND PUBLIC FACILITY AND SERVICES ELEMENT	
General Land Use Policies	
1. In furtherance of the Overall Goals set forth above and the General Goals of the General Plan listed on Page 6, it is the policy of the Town that the developable land area designations (all areas not designated Open Space) set forth in this plan and the overall development intensity described herein are to be the ultimate size and intensity for the community and no intensive development (housing, commercial, or industrial) shall take place outside the area designated for such development in this plan.	Consistent. Development of the Project would take place within an area designated for Resort (R) development. The Resort designation includes mixed visitor oriented uses including lodging, visitor oriented commercial, and recreation uses. The proposed uses are in accordance with the allowable uses for the Resort designation. The Project proposes 7.35 dwelling units per acre, including hotel units, which is in accordance with the maximum allowable density of eight units per acre for the Resort designation. The Project would not exceed the maximum allowable lot coverage of 50 percent for the Resort designation established in the 1987 General Plan.
2. The Town shall use Specific Plans to refine Land Use District Plans as needed and shall prepare Program Environmental Impact Report documents to guide Specific Area Plan Development and to reduce repetitive project level environmental documentation.	Consistent. The Project is subject to and proposes a Master Plan Amendment providing for the completion of a master planned community including residential neighborhoods, commercial uses, hotel/resort uses, recreational amenities, and a trail/roadway system. However, due to changes proposed in the updated 2007 Master Plan a new project-level environmental analysis is required.
3. The Town shall evaluate each District Plan, Specific Area Plan, and development proposal to assure that a balanced expansion of all major land use types occurs, and is coordinated with commercial recreation development.	Consistent. The Project proposes several major land use types including residential, commercial, retail, recreation, and hotel/resort uses. The Project would integrate a mix of residential types within distinct neighborhood contexts. Additionally, the Project would include multiple options for recreational amenities. The Project is subject to multiple reviews by the Town including: environmental review pursuant to CEQA; design review by the Town Community Development Department, other departments and divisions, and outside agencies; consideration by the Town Planning Commission; and ultimate consideration by the Mammoth Lakes Town Council. The extent to which the Project proposes a balanced expansion of all major land use types, coordinated with commercial recreation development, would be contemplated by each of the abovementioned entities during their respective periods of Project review and/or consideration.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Residential Land Use Policies	
<p>1. The Town shall encourage recreation visitor and commercial recreation-employee housing to be located in or near commercial centers, major recreation nodes (such as ski-base areas, golf courses and transit hub), through incentive and disincentive policies.</p>	<p>Consistent. The Project proposes construction of a variety of recreation visitor and commercial recreation-employee housing. Proposed residential uses include low-, medium-, and high-density residential development (condominiums and townhomes), a Private Residence Club (PRC)/suite units, and hotel accommodations. Of the residential development, 80 units would be allocated as workforce housing. The Project would expand an existing recreation node (Golf Course) in proximity to the proposed residential uses, with multiple options for recreational amenities including the expanded Snowcreek Golf Course, Resident's Club, and Outfitters' Cabin (providing outdoor equipment rental and trail head access/parking). The Project also proposes 75,000 square feet of commercial space.</p>
<p>2. Developments shall be encouraged (but not required) through incentives in the Development Code to provide employee housing on-site or where on-site provision is infeasible to provide such housing off-site, or if appropriate, contribute to an employee housing development fund.</p>	<p>Consistent. The Project includes the development of 80 units of workforce housing on-site with the balance of required workforce housing provided off-site.</p>
<p>3. The Town shall encourage compact/clustered residential development and increased open space areas in non-single family areas, through criteria and incentives/disincentives.</p>	<p>Consistent. The Project is organized into a series of clustered residential neighborhoods (including low-, medium-, and high-density residential development) interspersed among outdoor use/open space areas, commercial and resort uses, and recreational amenities. The Project would provide for sensitive transitions between residential and other land uses through open space dedication and design.</p>
<p>5. The Town shall allow residential uses in commercial areas to provide housing opportunities for employees within the commercial areas.</p>	<p>Consistent. The Resort land use and zoning designation allows for the construction of housing near commercial uses.</p>
<p>7. The Town shall develop and apply performance design review criteria for residential areas: 1) to assure that residential development is designed to enhance the Town's mountain resort character 2) to provide for sensitive transitions between residential and other land uses, through open space dedication and design, and 3) to better integrate residential development with a natural environment.</p>	<p>Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project would cluster medium and higher density residential units in the center of the development area, with lower density residential located adjacent to open space to preserve open space and provide for the transition of high- to low-density uses adjacent to open space areas. The Project would further integrate residential development with a natural environment by emphasizing an architectural style appropriate to the climate and natural setting of the Eastern Sierra. Traditional tools of California architecture would be encouraged, including rugged stone building bases, and expressive detailing at roof edges, balconies, window</p>

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
	trims, and doorways. The goal would be a distinctive building architecture that is executed with materials, colors, and finishes, appropriate to the local environment.
8. The Town shall encourage a diversity of housing types.	Consistent. See discussion for Residential Land Use Policy 1, above.
9. The Town shall encourage affordable housing through development incentives, and utilization of federal and state affordable housing programs as appropriate.	Consistent. The Project includes the development of 80 units of workforce housing on-site with the balance of required workforce housing provided off-site.
11. The Town shall adopt a zoning ordinance which includes controls on site coverage and population density while allowing flexibility in the types and sizes of residential units to be developed.	Consistent. The Project is located in an area designated as Resort (R) and Open Space (OS). The R designation would allow flexible development. The Project includes land use regulations related to permitted and conditional uses, density, building height, right of way (R.O.W.), building setback, building separation, lot size, and site coverage. The Project includes a variety of permitted land uses, allowing for future flexibility in the types and sizes of residential units to be developed in each area (see discussion for Residential Land Use Policy 1, above).
Commercial Land Use Policies	
2. Review criteria for commercial development proposals shall include: adequate site size for the proposed use, snow storage and removal, snow shedding, and an analysis of the relationship to the Town's transportation and other facilities and services including assurance of adequate access and on-site circulation. Utilization of the natural features of the site, a beneficial relationship to other land uses, and adequate landscaping and buffering shall be required.	Consistent. The Project is consistent with the underlying commercial design concepts expressed in this policy. The Project would include designs for snow storage, removal, and shedding that are in compliance with the Town's Zoning Code requirements. The Project's relationship to the Town's transportation facilities and the adequacy of Project access and on-site circulation are analyzed in Section IV.M (Transportation/Traffic) of this Draft EIR. As discussed therein, the Project would not result in significant impacts related to traffic, access, or on-site circulation. As discussed in Sections IV.K (Public Services) and IV.N (Utilities/Service Systems) of this Draft EIR, the Project would not result in significant impacts to other public services and facilities provided by the Town, including police and fire services, schools, parks, libraries, and water, sewer, and solid waste facilities. Landscape site work would be consistent with traditional approaches for the region, would address current needs, codes, regulations, and environmental considerations; would enhance the user experience, safety, and enjoyment; and would contribute to adequate buffering as needed. With respect to the visual relationship between on-site land uses, see discussions for Residential Land Use Policies 3 and 7, above.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
3. The Town shall review proposed commercial developments and apply incentives and disincentives in the Development Code to achieve a balance between the commercial needs of visitors and permanent residents.	Consistent. The Project would include commercial uses for both residents and visitors. Proposed uses such as the Store and Outfitters' Cabin will be available to both residents and visitors.
7. The Town shall assure that commercial uses are compatible with Mammoth Lakes livability and environment (e.g., non-disruptive due to traffic, noise, pollution, or other impacts and designed appropriately for the site and environmental constraints) through the application of design review criteria and development incentives in the Town Development Code: a) The architectural design of existing and future commercial structures shall be encouraged to be in keeping with the alpine character of the area, and b) Commercial developments shall be encouraged to be constructed in compact centers, rather than in strip commercial areas or among non compatible uses.	Consistent. As discussed in Sections IV.M (Transportation/Traffic), IV.I (Noise), and IV.C (Air Quality), Project specific impacts would be less than significant in relation to traffic congestion, noise, and air pollution (respectively). With respect to other pertinent issues, the Project's compatibility with and impact on the surrounding environment is analyzed throughout this Draft EIR. With respect to the preservation of the alpine character through architectural design, see discussion for Residential Land Use Policy 7, above. The Project would be a Master Planned community consisting of a variety of land uses (including commercial uses) which would be designed and sited in a manner that emphasizes cohesiveness and compatibility between uses.
8. The Town shall determine the types of retail and service commercial developments which are needed to serve the Town's permanent population, and encourage their development through incentives in the Town's Development Code.	Consistent. The Project would provide a broad range of activities, services, and facilities for residents and visitors year round. See discussion for Residential Land Use Policy 1, above.
Recreation and Resort Land Use Policies	
1. The Town shall encourage year-round visitors by providing incentives in the Development Code for recreation and visitor housing developments to provide resort amenities and recreation activities such as tennis courts, athletic clubs, skating rinks, golf courses, riding and hiking trails , etc.	Consistent. The Project is consistent with the underlying concepts expressed in this policy of providing visitor housing and recreation amenities. See discussion for Residential Land Use Policy 1, above.
2. The Town shall encourage resort and resort-related development such as recreation facilities, hotel/motel facilities, and recreation-related commercial projects at designated recreational activity nodes through incentives in the Town's Development Code.	Consistent. The Project is consistent with the underlying concept expressed in this policy of providing recreation and resort amenities. See discussion for Residential Land Use Policy 1, above.
3. The Town shall improve visitor-Town relations by designating a site for a visitor's center in the community.	Consistent. The Project would contribute to the improvement of visitor/Town relations by providing both an Interpretive Center, and an Outfitters' Cabin, which would provide outdoor equipment rental and sales, parking, and trail head access. These amenities would provide visitors with information about the Town and Project area and the various recreational amenities available.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
4. Each recreation activity node and related development shall have an architectural theme, and a well integrated design plan which encourages visitors to stay in the designated resort nodes.	Consistent. See discussions for Residential Land Use Policies 3 and 7, above.
Open Space Policies	
6. The Town shall designate passive and active open space areas in which varying levels of recreation activities are encouraged: <ul style="list-style-type: none"> - Use of open space areas such as paths, picnic facilities, etc., shall be limited to passive activities. - The Town shall restrict intensive recreational activities to areas designated for active open space uses. 	Consistent. The Project is consistent with the underlying concept expressed in this policy of providing passive and active open space opportunities. See discussion for Residential Land Use Policy 1, above.
General Public Facilities and Services Policies	
1. The Town shall ensure that public facilities planning and construction provide an efficient framework for and are constructed commensurate with community growth.	Consistent. As discussed under the “Growth Inducing Impacts” heading in Section V (General Impact Categories) of this Draft EIR, facility construction associated with the Project would be site-specific and would not foster substantial concomitant population growth in the community (e.g., the Project does not propose typical growth-inducing uses such as a major roadway extension or a water treatment plant). As discussed in Section IV.J (Population/Housing) of this Draft EIR, the Project would result in direct population growth associated with the proposed on-site residences, as well as some indirect population growth associated with the jobs that would be provided by the proposed commercial, retail, and recreational uses. The population growth associated with the Project, both direct and indirect, would be consistent with local and regional population and growth forecasts. Thus, the effects of the Project would be commensurate with anticipated community growth.
2. The Town shall consider impacts on community services and facilities prior to approval of development and annexation requests.	Consistent. Project impacts on community services and facilities are respectively analyzed in Sections IV.K (Public Services) and IV.N (Utilities/Service Systems) of this Draft EIR.
3. The Town shall require development projects to bear their proportionate share of the costs for needed services and facilities.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project applicant is subject to development fees related to schools and parks in order to mitigate potentially significant impacts. As discussed in Section IV.N (Utilities/Service Systems) of this Draft EIR, all necessary utility improvements would be funded by the Project applicant.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Water Supply Policies	
1. The Town shall only approve development when adequate water supply and fire flows can be demonstrated at the appropriate stage of development as identified in the Development Code. When evaluating available water supply, the Town shall consider water available during a year where precipitation is less than 50% of normal.	Consistent. As discussed in Section IV.N (Utilities/Service Systems) of this Draft EIR, the water supply assessment prepared for the Project by the Mammoth Community Water District indicates that adequate water supply, storage, and off-site distribution facilities exist for buildout of the Project. As discussed in Section IV.K (Public Services) of this Draft EIR, all water lines would be sized per Mammoth Community Water District requirements and to provide the required fire flow per Mammoth Lakes Fire Protection District requirements.
2. The Town shall work with the Mammoth Community Water District (MCWD) and other potential water suppliers to provide adequate water. The Town shall support MCWD actions to reduce per capita usage, increase groundwater capabilities and develop additional storage and where feasible, secure additional water rights, initiate, appropriate water reclamation and reuse and possible water importation programs.	Consistent. Adequate water supply exists for the Project; therefore the Project is consistent with the underlying concept expressed in this policy of ensuring adequate water supply and water conservation. Additionally, if and when it becomes available, the Project proposes the use of tertiary water for irrigation of the golf course, which would decrease the amount of water required for the Project. Regarding water supply, see discussion for Water Supply Policy 1, above.
3. The Town shall encourage the detailed study of water usage, basin groundwater and additional surface water supply sources by seeking grants for such studies and/or requiring developers to contribute to a water study fund.	Consistent. Adequate water supply exists for the Project. A water supply assessment (WSA) was prepared for the Project (see Water Supply Policy 1, above) by MCWD. The WSA considers all currently feasible water supply sources available to the Project.
4. The Town shall require water resource conservation through design criteria in the Town Development Code (see Open Space and Conservation Ordinance policies).	Consistent. The Project would include the installation of native plants and would conform to the Town's adopted water-efficient landscape regulations. See discussion for Water Supply Policy 2, above.
5. The Town may only permit development which can show that the provision of water service is coordinated with the provision of other public facilities and services.	Consistent. See discussions for Water Supply Assessment Policy 1, above.
6. The Town shall ensure water system improvements are made with the least disruption to the environment and community through its reviewing powers.	Consistent. Refer to mitigation measures in Section IV.N.
Waste Water Management Policies	
2. The Town shall monitor growth trends and sewer tap requirements to assure development does not exceed the capacity of sewage lines and facilities. The Town shall encourage the MCWD to have adequate sewage capacity available when needed.	Consistent. The Project is consistent with the underlying concept expressed in this policy of ensuring adequate sewer capacity and treatment. As discussed Section IV.N (Utilities/Service Systems) of this Draft EIR, sewer infrastructure and treatment plants have adequate capacity to serve the Project upon buildout.
3. The Town shall permit only that development which can be adequately accommodated by the sewage facilities and lines, through conditions in the Town Development Code.	Consistent. See discussion for Waste Water Management Policy 2, above.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
4. The Town shall encourage MCWD to research the use of reclaimed and non-potable water and developers shall be encouraged to use reclaimed or non-potable water, if available.	Consistent. The Project would utilize reclaimed and non-potable water to irrigate the Golf Course, if and when it becomes available through MCWD.
Storm Drainage System Policies	
1. The Town shall implement the Storm Drainage Master Plan.	Consistent. As discussed in Section IV.G (Hydrology/Water Quality) of this Draft EIR, the proposed drainage plan has been designed in accordance with the standards and requirements set forth in the Town's Storm Drainage Master Plan.
2. The Town shall through requirements in the Town Development Code, assure that development projects provide the necessary on and off site drainage facilities and erosion control measures which assure that Mammoth Creek and other properties are not significantly affected by development runoff.	Consistent. As discussed in Section IV.G (Hydrology and Water Quality) of this Draft EIR, the Project would not result in significant impacts related to on- or off-site drainage issues, including drainage system capacity, erosion, and runoff water quality.
School Policies	
2. The Town shall assure that proposed developments pay appropriate school development fees or dedicate other appropriate items (e.g., sites, facilities, etc.) through requirements in the Town Development Code.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project applicant is required to pay school developer fees levied by the Town pursuant to Section 17620 of the California Education Code.
Community Resident Recreation Facility Policies	
2. The Town shall encourage developers to provide not only project-related recreation facilities, but public recreation facilities, including playfields, parks and trails, through requirements and conditions in the Town Development Code.	Consistent. The Project would provide not only project-related recreation facilities, including the Snowcreek Golf Course, Swim Club, and Outfitters' Cabin, but would also provide access to publicly-accessible recreational trails.
3. The development of resident recreational facilities shall be coordinated with both public and private visitor recreation facility development.	Consistent. See discussion for Residential Land Use Policy 1, above, and discussion for Community Resident Recreation Facility Policy 2, also above.
Fire Protection Policies	
2. The Town shall require development projects to conform to the Mammoth Lakes Fire Protection District Plan project design and fire suppression programs, through conditions and requirements in the Town Development Code.	Consistent. The Project is subject to design review by the Town Community Development Department, other Town departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for adequate roadway standards and emergency vehicle access. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project would conform with design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan. In addition, the Project is consistent with the Mammoth Lakes Fire Protection District Fire Code regarding maximum building heights of up to 120 feet. Furthermore, the analysis in Section IV.K concludes that the Project would not create any undue fire hazard related to design, fire flow, emergency access/response time, or fire hazards.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
3. The Town shall implement a roadway improvement program to improve the access of fire fighting equipment and to reduce response times.	Consistent. See discussion for Fire Protection Policy 2, above.
Police Service Policies	
1. The Town shall provide police protection and services sufficient to provide for the community's present security and safety needs.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Mammoth Lakes Police Department would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
Street and Road Maintenance Policies	
4. The Town shall prepare a Snow Removal and Storage Plan which: <ul style="list-style-type: none"> - Designates appropriate snow storage areas - Sets priorities for roadway, pedestrian path and trail clearance - Encourages the upgrading and dedication of private roads and pedestrian pathways into the public snow removal system - Establishes requirements in the Town Development Code for appropriate off-street parking areas, snow storage, and snow handling design requirements (such as covered sidewalks, snow loading design and roof design) for development projects, and - Sets forth a snow removal financing program. 	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for snow management including areas adjacent to driveways and parking areas, ground level snow storage, and landscape snow shed areas. Ground and roof level snow storage areas would be identified. Landscape snow shed areas would be designated and located adjacent to the base of buildings and would be sized to accommodate the anticipated volumes of snow. Roof forms would be designed in coordination with pedestrian areas at the base of buildings. Snow falling from roofs would be directed to landscaped areas at the base of the buildings or to lower level flat roofs.
PARKING AND TRANSPORTATION ELEMENT	
Roadway Design	
1.1 Plan, design, and regulate roadways in accordance with the functional classification system described in this element, as shown in the Circulation Plan. Develop and adopt roadway standards consistent with this Element.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for adequate roadway standards and emergency vehicle access.
1.3 Road, sidewalk, and bikeway standards should recognize the Town's climate to enhance functionality and to reduce the long-term maintenance costs of the circulatory system.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway, pedestrian, and bicycle trails would be reviewed by the Town for functionality in a mountain climate.
1.4 At intersections on arterial roads, ensure that traffic control devices, and other traffic safety and operational improvements are installed for the safe and efficient movement of all types of traffic and pedestrians, and provide levels of service that conform to these policies. Lighting will be evaluated to meet safety standards.	Consistent. The Project includes the construction of a traffic roundabout at intersection of Old Mammoth Road/Minaret Road to assist in safe, efficient traffic movements.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
1.6 Use alternatives to the construction of new traffic signals, including modern roundabouts and prohibitions on turn movements where they can be shown to benefit roadway capacity consistent with other community goals.	Consistent. The Project includes the construction of a traffic roundabout at intersection of Old Mammoth Road/Minaret Road to improve roadway capacity.
Level of Service	
1.7 Establish and maintain a Level of Service D or better on a typical winter Saturday peak-hour for signalized intersections and for primary through movements for unsignalized intersections along arterial and collector roads. This standard is expressly not applied to absolute peak conditions, as it would result in construction of roadway improvements that are warranted only a limited number of days per year and that would unduly impact pedestrian and visual conditions.	Consistent. The Project would include the construction of eastbound right-turn overlap signal phasing at the Minaret Road/Main Street intersection. Installation of this improvement would maintain intersection operations at LOS D.
1.8 Require the preparation of a traffic impact analysis report to identify impacts and mitigation measures for projects that may potentially result in significant traffic impacts. Level of service shall be computed according to the methodology presented in the Highway Capacity Manual. Cumulative impacts shall be modeled assuming full build-out of the General Plan.	Consistent. A Traffic Impact Study was prepared for the Project that identified a significant impact at the Minaret Road/Main Street intersection. The Project would include construction of an eastbound right-turn overlap signal phasing at the Minaret Road/Main Street intersection to maintain LOS D.
1.9 In planning the Town's transportation system, strive for a balanced system that provides alternatives to the automobile while still meeting the level of service standards expressed in this Element.	Consistent. The Project includes pedestrian and bicycle trails that connect to the broader Town trail system. The Project would also include the construction of bus shelters.
Roadway Network	
1.11 The Town will investigate and, where appropriate, implement steps to address documented and significant "cut through" traffic problems on residential streets.	Consistent. The Project would not provide any access to roads that would entice motorists to use Project roadways as "cut through" routes.
1.14 To aid the access of emergency vehicles and the evacuation of residents and visitors, access routes should be provided and maintained to all portions of the community, consistent with the Mammoth Lakes Fire Protection District requirements.	Consistent. The Project would provide two points of access to Old Mammoth Road that could be used in an emergency.
Financing of Improvements	
1.17 Require proponents of development proposals to analyze the project's contribution to increased vehicle traffic, transit demand, air quality impacts, and pedestrian/bicycle traffic, and to implement improvements necessary to address the increase. Mitigation of significant project-related impacts may require improvements beyond those addressed by the Town of Mammoth Lakes Capital Improvement Program and the Town of	Consistent. A Traffic Impact Study was prepared for the Project that identified a significant impact at the Minaret Road/Main Street intersection. The Project would include construction of an eastbound right-turn overlap signal phasing. The Project applicant would fund the improvements to the intersection.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Mammoth Lakes Air Quality Management Plan and Particulate Emissions Regulations.	
1.18 Require new development to dedicate right-of-way consistent with adopted road standards. New development, as warranted, shall pay its fair share of roadway, pedestrian, transit, bicycle, and airport improvements.	Consistent. Project streets would be privately-owned and maintained and no other right-of-way dedication is required. The Project would contribute to funding of improvements at the Minaret Road/Main Street intersection (the only significant Project-related traffic impact).
Parking	
1.23 Encourage the use of alternative transportation modes, as a means of reducing parking demand.	Consistent. The Project includes pedestrian and bicycle facilities that connect to the broader Town trail system. The Project would also include the construction of bus shelters.
1.25 Promote the use of shuttle transit services from development projects to major destinations, in order to reduce parking demand.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by including the construction of transit stops. The Red Line currently provides bus stops adjacent to the Project site.
Inter-Jurisdictional Coordination	
2.1 Coordinate with service providers to relocate existing overhead utilities underground along existing roadways while restoring the roadways to an "as good or better condition." Require underground utilities in new developments.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All utilities would be located underground and would be reviewed by the Town for consistency with Design Guidelines.
2.3 New roads and roadway improvements shall be correlated with the guidelines of the Noise Element of The Town of Mammoth Lakes General Plan.	Consistent. As noted in Section IV.I. (Noise), the Project would not create impacts from noise or expose persons to noise in excess of the Town's noise standards or policies in the Noise Element.
2.5 Ensure that roadways are no wider than adequate to safely accommodate traffic and bicycle demands, however, adequate right of way shall be provided for safe snow storage, trucking or alternative snow management means have been specifically identified.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for adequate right of way for safe snow storage, trucking or alternative snow management practices.
2.6 Consider the modification of street geometry to address documented traffic speed, neighborhood cut-through, or safety issues. Any modification must be carefully evaluated in light of potential emergency response and snow removal impacts.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for adequate roadway standards, emergency vehicle access, and snow removal.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Transit	
3.1 Work with transit providers to provide year-round transit services within and to the Town that are timely, cost effective, convenient, and responsive to growth patterns and to existing and future transit demand.	Consistent. The Project includes the construction of transit stops. The Project would include connections to the Mammoth Lakes Transit Red Line and a shuttle service. The Red Line currently provides bus stops adjacent to the Project site.
3.2 Consider the need for future transit facility right-of-way in reviewing and approving plans for development and roadway construction or improvements. Incorporate features to encourage transit and reserve right-of-way for future transit access in plans for new growth areas. Transit right-of-way may either be exclusive or shared with other vehicles.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for future transit facility right-of-way, plans for development and roadway construction or improvements, adequate roadway standards, emergency vehicle access, and snow removal. The Project has committed three specific transit enhancements to and from the site. These enhancements include: <ol style="list-style-type: none"> 1. A revision to the Red Line bus route that includes a stop at the Hotel entrance on the Project site and a return to the original bus route. 2. An exclusive shuttle service provided for hotel guests to Eagle Lodge and the Village/Gondola area. 3. Another three to four shuttle vans to be paid for by the Snowcreek VIII master homeowners association for all residents to use to major visitor stops including Eagle Lodge, the Village, Main Street and Old Mammoth Road commercial.
3.3 Develop transit and parking management strategies that encourage visitors to leave their private vehicles at their lodging property throughout the course of their stay.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by providing transit stops, pedestrian and bicycle facilities, and adequate parking.
3.7 In the development of both community-wide land use plans and site plans for individual projects, strive to provide a development pattern that supports use of public transit through the clustering of land use density near established transit stops and the provision of convenient pedestrian connections to transit stops.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by proposing several major land use types including residential, commercial, retail, recreation, and hotel/resort uses near transit stops. Additionally, the Project would provide pedestrian and bicycle connections to transit stops. The extent to which the Project proposes a balanced expansion of all major land use types, coordinated with commercial recreation development, would be contemplated by the Town during Project review and/or consideration.
3.8 Require new development to provide sheltered public transit stops with turnouts where appropriate. Consider development of turnouts in existing developed areas when roadway improvements are made, or as deemed necessary for traffic flow and public safety.	Consistent. See response to Policy 1.25.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Transportation Control Measures (TCM)	
4.2 Provide for the development of a transportation and circulation system that maintains or enhances air quality in and around the Town.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by mitigating Project impacts to maintain adequate LOS. Additionally, the Project would include facilities that would encourage the use of alternative transportation modes (bicycle and pedestrian facilities, transit stops).
4.5 Require transportation studies for major development projects to address potential use of bicycle routes, pedestrian trails, and public transportation to mitigate traffic impacts.	Consistent. A Traffic Impact Study was prepared for the Project that included analysis of bicycle and pedestrian facilities.
4.7 Promote the development of a public transit system that reduces the need for automobile usage, promotes the usage of non-motorized modes of transit, and complements the pedestrian-oriented vision of the Town.	Consistent. The Project includes the construction of transit stops. The Project site is currently served for transit by Mammoth Lakes Transit Red Line. The Red Line provides bus stops adjacent to the Project site and provides service to North Village, Snowcreek Athletic Club, and the Main Lodge via Old Mammoth Road, Minaret Road, Chateau Road, Main Street, and Canyon Boulevard. (see 3.2 discussion above)
Non-Motorized Transportation	
5.3 Commercial uses, recreational activity centers, institutional uses, and multi-family residential areas should be linked to the community-wide pedestrian trails network, where feasible.	Consistent. The Project would include a pedestrian and bicycle system with interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods.
5.5 New bikeways should be linked with other bikeways and parks, to provide safe continuous routes, wherever feasible.	Consistent. The Project would include a bicycle system connecting with existing Town trails and recreational amenities, outdoor spaces and neighborhoods; thereby creating safe continuous bikeways.
5.7 Establish pedestrian and bicycle access standards. Require developers to finance and install pedestrian walkways, equestrian trails, cross-country ski trails, and multi-use trails in new development, consistent with adopted plans and policies, or as appropriate and necessary to address circulation needs.	Consistent. The Project would include pedestrian and bicycle facilities. Additionally, the Project would be linked to hiking, cross country, snow shoeing, and mountain biking trails.
5.9 Strive to provide for a variety of non-motorized user experiences.	Consistent. The Project would include a pedestrian and bicycle system with interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods. Additionally, the Outfitters' Cabin and trailhead would provide access to hiking, cross country, snow shoeing, and mountain biking trails.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Development of New Growth Areas	
8.1 Encourage development patterns within the urban limits to provide a variety of land uses, in order to maximize the proportion of trip purposes that can be accommodated by short trips.	Consistent. The Project proposes several major land use types including residential, commercial, retail, recreation, and hotel/resort uses. The Project would include multiple options for recreational amenities. This variety of land use types would provide amenities within a compact area.
8.2 Require that transportation systems in new developments be designed to provide residents and employees with the opportunity to accomplish many of their trips within the new development areas and to other major destinations of the Town by walking, bicycling, cross-country skiing, and using public transit.	Consistent. The Project would include commercial, residential, and recreational uses connected by a pedestrian and bicycle system both internally and to the Town's trail system. The Project site is currently served for transit by Mammoth Lakes Transit Red Line.
8.3 Promote the development of crosswalks, sidewalks, neck-downs for crosswalks, public sitting areas, pedestrian trails, bike trails, and cross-country ski trails in the new development areas, in order to enhance safety, complement the non-motorized vehicle trails, and promote a pedestrian atmosphere.	Consistent. As discussed in Section III, Project Description, the Project would include a pedestrian and bicycle system with interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods.
HOUSING ELEMENT	
1.A The Town shall administer land use regulations to maintain and expand existing housing options.	Consistent. The Project is consistent with the Resort General Plan land use designation, which allows for the development of a variety of housing types.
1.B The Town shall administer land use and development regulations to facilitate the development of housing. These regulations shall include incentives for the development of affordable housing.	Consistent. The Project would provide 80 units of workforce housing. Additionally, the Project proposes a variety of housing types, which would create homeownership opportunities to a variety of income levels.
2.A The Town shall promote handicapped and elderly access in new housing developments, common areas, and public facilities.	Consistent. The Project would be ADA-compliant.
2.B The Town shall maintain zoning which provides for different types of housing throughout the community	Consistent. The Project is consistent with the Resort zoning, which permits a variety of housing types.
2.C The Town shall work to eliminate discrimination in housing.	Consistent. Public spaces would be designed to be ADA-compliant. The Project would provide housing types (workforce housing, and low-, medium-, and high density housing) to meet the needs of a variety of households.
3.A The Town shall work to assure that all new development is energy efficient.	Consistent. The Project would be consistent with this policy by including energy efficient appliances, drought-tolerant landscaping, using recycled water for irrigation of the Golf Course (if it becomes available), and by incorporating the Town's recycling program, thereby diverting solid waste from the landfill.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
CONSERVATION AND OPEN SPACE ELEMENT	
Natural Vegetative Resources	
2. The Town shall inventory and map all natural vegetation with an emphasis on the location and identification of rare, unique and endangered species.	Consistent. The Project would not impact rare, unique, or endangered species.
3. Riparian and in-channel vegetation shall be preserved or restored to the maximum extent possible to protect water quality and the wild life habitat associated with riparian corridors, through the application of design criteria and Incentives in the Town Development Code.	Consistent. The portion of the Project located north of Old Mammoth Road would avoid Mammoth Creek and would not impact any riparian or in-channel vegetation.
5. Vegetative species which are rare, unique or endangered should be protected from destruction or alteration to their environment which would impair their vigor.	Consistent. See response to Policy 2.
7. Sensitive habitat areas shall be protected through open space buffers, fencing and signage, construction of roads, trails and paths away from sensitive areas, and reduction or removal of development densities near sensitive areas.	Consistent. The portion of the Project located north of Old Mammoth Road would avoid Mammoth Creek and would not impact any sensitive habitat areas. There are no other sensitive areas on the Project site.
8. Landscaping plantings shall be required to: 1) be of the native plant species they replace, and/or non-invasive, and 2) drought resistant, to the greatest extent feasible, in accordance with design criteria in the Town Development Code.	Consistent. The Project would use native plantings that are non-invasive and drought resistant in accordance with design criteria in the Town Development Code.
9. Landscaping plans which require intensive summer irrigation, fertilization and intensive landscaping should be discouraged by design criteria and disincentives in the Town Development Code.	Consistent. See response to Policy 8.
10. Motorcycles, all-terrain bicycles, and other vehicles shall be restricted in ecologically sensitive areas.	Consistent. The Project does not propose the use of motorcycles, vehicles or bicycles in areas that are not paved.
Wildlife Resources	
1. Through development controls and incentives, the Town shall identify: 1) primary habitat areas which shall be protected from intrusion by development and human activity, and 2) other habitat areas in which the impact of development and human activity will be minimized.	Consistent. The Project would avoid riparian habitat of Mammoth Creek to minimize the impact of human development.
2. The Town shall maximize the protection of primary wildlife habitats through public and/or private management programs which include: 1) requiring (encouraging) the construction of active and passive recreation and development areas away from the habitat, and 2) use of fences, or other barriers and buffer zones.	Consistent. The Project would avoid riparian habitat of Mammoth Creek to minimize the impact of human development. Approximately 46 acres of potential foraging and resting habitat south of Old Mammoth Road and east of Fairway Drive that may be used by deer in the adjacent holding area would be lost. However, implementation of mitigation measures as described in Section IV.B would reduce this impact to less than significant.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
<p>3. The Town shall minimize the impact of development and human activity on non-primary habitat areas through: 1) retaining of natural vegetation in proposed development areas, 2) providing buffers where necessary and design controls, 3) by enforcing leash laws and providing public information concerning the potential destruction of wildlife by domestic pets, and 4) by clustering development away from these areas to the maximum extent practicable.</p>	<p>Consistent. Some Jeffrey pine and lodgepole pine are scattered throughout the basin sagebrush on the Project site. Some trees on the site may meet the minimum size (six inches in diameter) to require approval from the Town prior to removal. However, implementation of mitigation measures as described in Section IV.B would reduce this impact to less than significant. The Project would cluster development in the interior of the site and the Golf Course would serve as a buffer between surrounding open space areas to the east and south and residential/commercial development.</p>
<p>4. The Town shall protect the deer herds and their migration corridors to the maximum practical extent through:</p> <ul style="list-style-type: none"> a) provision of open space buffers between developments adjacent to migration corridors; b) limited construction of new roads crossing migration routes; and c) modification of existing road impacts to deer migration areas by measures which could include: 1) posting signs, 2) limiting driving speeds, and 3) divising channels migrating animals. 	<p>Consistent. As noted in Section IV.D. (Biology), the Project would not impact any deer migration corridors. Approximately 46 acres of potential foraging and resting habitat south of Old Mammoth Road and east of Fairway Drive that may be used by deer in the adjacent holding area would be lost. However, implementation of mitigation measures as described in Section IV.B would reduce this impact to less than significant.</p>
<p>5. Instream water quality and quantity should be maintained to preserve riparian habitats (see the Water Resources Policies)</p>	<p>Consistent. The Project includes retention basins and water quality treatments that would maintain instream water quality and preserve riparian habitats.</p>
Water Resources	
<p>1. The quality and quantity of surface and ground waters should be maintained at acceptable levels as determined by appropriate agencies.</p>	<p>Consistent. The Project would be in compliance with all RWQCB regulations.</p>
<p>2. The Town shall retain to the maximum practical extent, primary community water-courses and bodies in their natural state, through criteria in the Town Development Code. Creek corridors should be carefully identified, corridor setbacks established and strict regulations precluding riparian vegetation removal and creek regimen modification should be adopted.</p>	<p>Consistent. The Project would avoid Mammoth Creek and would not impact any riparian resources.</p>
<p>3. The Town shall develop a stream corridor preservation plan for the Mammoth Creek corridor. An Open Space Stream Conservation corridor (OSSC) has been designated along the creek (see the Land Use Element).</p>	<p>Consistent. The Project would avoid Mammoth Creek and would not impact any riparian resources.</p>
<p>4. The Town shall carefully regulate development encroachment into flood plains and the perimeter of natural water bodies.</p>	<p>Consistent. The Project would avoid Mammoth Creek and would not be located in the floodplain of Mammoth Creek. There are no floodplains located on the Project site to the south of Old Mammoth Road.</p>

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
Cultural Resources	
2. An archeological and historic site survey shall be conducted for environmental impact reports whenever a critical site(s) might exist within a project area and to the maximum practicable extent any discovered site shall be preserved or treated in accordance with the recommendations in the survey report.	Consistent. An archaeological and historic site survey was conducted for the Project.
3. The Town shall strive to ensure that historic and archeologic sites are available to residents and visitors by: 1) establishing funding for historic and archeologic preservation through state and federal grants, private trusts, and donations, 2) actively promoting the Town's cultural resources in cooperation with the Mammoth Lakes, Resort Association and Historic Society and 3) encouraging the provision of publications about and tours of the sites	Consistent. The Project includes a Store and an Interpretive Center. The Interpretive Center would include an interactive educational facility, providing residents and visitors with information and exhibits regarding the history and resources of Mammoth Lakes and the Mammoth Creek Corridor. The Store would draw inspiration from the historic Lutz Market during the early settlement days of Mammoth Camp.
SAFETY ELEMENT	
Avalanche Safety	
1. The Town shall require developers to implement appropriate mitigation measures in avalanche areas through requirements in the Town Development Code.	Consistent. The potential for rock falls or snow avalanches to occur on the Project site is considered low and no evidence of landslides has been observed.
Snow Shedding	
6. To adopt standards in the Town Development Code which will limit hazards to people and property resulting from snow and ice falling from roofs. These standards could include setbacks, roof orientation, roof construction, and other applicable considerations.	Consistent. The Project would incorporate snow management devices and roof drainage systems in the roof and building design, so that snow will not be permitted to shed freely into active pedestrian or vehicular areas.
Flood Zone	
7. No development shall be allowed in Mammoth Creek or other flood hazard area and such areas shall be maintained in open space uses which will not contribute to run off and snowmelt in the hazard area.	Consistent. The Project would avoid Mammoth Creek and would not be located in the floodplain of Mammoth Creek. There are no floodplains located on the Project site to the south of Old Mammoth Road.
Fire Protection	
9. The Fire District should minimize the incidence of structural fires by: a) regular inspections by the Fire I District, b) voluntary residential inspections, c) review of new development and remodeling plans in coordination with the Town's Development Review Procedures, and d) institution of public fire education programs.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project would be reviewed by the Town for conformance with Fire District standards. The Project does not exceed Mammoth Lakes Fire Protection District Fire Code regarding maximum building heights up to 120 feet. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project conforms with design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
	Furthermore, the analysis in Section IV.K concludes that the Project would not create any undue fire hazard related to design, fire flow, emergency access/response time, or fire hazards.
10. The Town shall help assure provision of adequate fire protection services by requiring development to conform to Fire District Plans, ordinances and requirements, and. to provide for fire protection personnel and equipment through requirements in the Town's Development Code, subdivision requirements and ordinances	Consistent. See response to Policy 9.
12. The Town shall assist the Fire Department in reducing access land location delays, and in improving fire suppression by requiring: a) business and house numbers to be visibly posted on each structure; b) a Fire District review of proposed development and remodeling projects as part of the Town Development Review Process, to assure proposed structures, roads/access and fire prevention proposals are adequate; c) to the maximum extent feasible, consultation between the Town and Fire District be held before any plans involving street, road, hydrant, water main/supply, or any other improvement affecting fire safety are approved by the Town or submitted for bid; d) incorporation of appropriate site and structure design criteria in the Town Development Code to reduce fire hazards including: fire preventive building design appropriate building location and spacing, adequate access, etc.; e) to the maximum extent possible, consistency between the various Town Codes and Fire Codes; f) a roadway snow removal priority plan based on fire response access to the urbanized areas of Mammoth Lakes during heavy snow conditions.	Consistent. See response to Policy 9.
15. Within the municipal boundaries, the Town shall support the policies of the Mammoth Lakes Fire Protection District regarding storage of explosives or chemicals listed as hazardous by the state or federal government and shall prohibit the above ground bulk storage of gasoline, diesel or propane fuels.	Consistent. The Project does not propose any storage of gasoline, diesel, or propane fuels on-site.
Geologic Safety	
18. The Town shall require developers to complete a preliminary soils and foundation analysis, and prepare a comprehensive erosion control plan to prevent erosion and siltation of streams in the Community, through conditions in the Town Development Code.	Consistent. A geotechnical report was prepared for the Project. Additionally, the Project would include Best Management Practices for grading and construction activities, which would prevent erosion and siltation of streams.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
19. The Town shall require detailed geotechnic studies of sites with slopes of 20% or greater, land slide or liquefaction potential, or other potential geotechnic hazards, through requirements in the Town Development Code.	Consistent. A geotechnical report was prepared for the Project to assess the potential for and slide or liquefaction potential, or other potential geotechnical hazards to occur on the Project site.
21. The Town shall encourage grading and foundation plans which minimize excavation. Off-site disposal of soils shall be discouraged, and where excavation is necessary, balanced cut and fill will be encouraged. Further, if excavated soils must be moved off-site, designated borrow pits shall be used and sculpted to fit the surrounding topography. Fill materials shall be extracted from Town designated areas.	Consistent. The Project includes understructure parking and would require excavation. Project grading plans will be reviewed by the Town to ensure that off-site disposal is minimized and that cut and fill are balanced on the Project site.
22. Soil erosion and soil transport during construction shall be controlled through requirements in the Town Development Code, including: a) Disturbed soil surfaces covered with mulch or grass until vegetation is re-established and/or permanent surface is overlaid; b) Minimization of exposed graded areas for extended periods through project phasing; c) Sprinkling of disturbed soils; d) Covering, windfencing around or wetting of stockpiled topsoil or dusty building materials; e) Use of wind erosion construction barriers in sites exposed to wind erosion during construction; f) Limitation of construction equipment and vehicle speeds to 5 miles per hour on construction sites; and g) Use of sedimentation basins or ponds to prevent sediment reaching streams and the Town drainage system.	Consistent. The Project would include Best Management Practices for grading and construction activities, which would minimize the erosion of soils on the Project site.
25. The Town shall require major developments to prepare and Specific Area Plans to address hazard emergencies such as evacuation, shelter, communication Issues, etc.	Consistent. The Project would include the preparation of emergency plans.
Seismic Safety	
26. The Town shall ensure that new development, modernization projects and public works facilities projects will be constructed to reduce structural damage during seismic events through conditions in the Town's Development Code, including: a) The strict enforcement of the Uniform Building Code sections regarding seismic design, grading and excavation; b) Upgrading of utilities serving the development to withstand projected earthquake loadings and/or to shut off utility in case of failure (e.g., gas pressure drop valves), and; c) Requiring detailed geotechnic studies for development sites with liquefaction, landslide and faulting potential	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project would be designed in conformance with the recommendations contained in the Geotechnical Report and to current California Building Code (CBC) requirements, which will reduce the potential for structures on the Project site to sustain damage during an earthquake event.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
to insure appropriate siting and design is utilized in project development.	
29. The Town shall ensure that adequate emergency access is available to evacuate peak populations during emergencies through: a) Designation of an additional emergency access road alignment(s) to accommodate buildout populations; b) Completion of the existing roadway system; and c) Encouragement of continued airport improvements to improve its use for emergency evacuation.	Consistent. The Project would include two access points that would be used in the event of an emergency.
Police Services	
35. The Town shall maintain an adequate police force commensurate with increases in Town population and development.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Town of Mammoth Lakes Police Department would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
NOISE ELEMENT	
4.2.1 New development of noise-sensitive land uses shall not be permitted in areas exposed to existing or projected future levels of noise from transportation noise sources which exceed 60 dB Ldn in outdoor activity areas or 45 dB Ldn in interior spaces.	Consistent. As noted in Section IV.I. (Noise), the proposed residential uses within the Project site would not be exposed to traffic noise levels exceeding 60 dB L _{dn} .
4.2.2 Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed 60 dB Ldn within outdoor activity areas and 45 dB Ldn within interior spaces of existing noise-sensitive land uses.	Consistent. Project mitigation measures for construction noise are discussed in Section IV.I. (Noise).
4.2.3 New development of noise-sensitive land uses shall not be permitted where the noise level from existing stationary sources exceeds the noise level standards of Table VII.	Consistent. Existing stationary sources do not exceed the noise level standards of Table VII (refer to Section IV.I. (Noise)).
4.2.4 Noise created by new proposed stationary noise sources or existing stationary noise sources which undergo modifications that may increase noise levels shall be mitigated so as not to exceed the noise level standards of Table VII at noise-sensitive uses.	Consistent. Project mitigation measures for noise are discussed in Section IV.I. (Noise).
PARKS AND RECREATION ELEMENT	
1A-1 The Town shall encourage year round visitors by creating incentives in the Development Code for recreation and visitor housing developments to provide resort amenities and recreation activities such as tennis courts, athletic clubs, skating rinks, golf courses, riding and hiking trails, etc.	Consistent. The Project includes year-round resort amenities and recreation activities such as a golf course, a wellness and fitness center, ice rink/pond, swim club, trailhead access, and outdoor equipment rental.

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
<p>1A-3 The Town shall preserve the resort-alpine character of Mammoth Lakes through the adoption of tree preservation standards which retain heritage trees (i.e., significant stands of old growth trees of unique or heritage quality, and large individual specimens) and groves where reasonable, and retain to the maximum extent feasible, the forest canopy and forested character of the Town. Native tree species should be planted to help offset the loss of trees unavoidably removed during construction (Conservation and Open Space Natural Vegetative Resources Policy #1).</p>	<p>Consistent. As noted in Section IV.B (Aesthetics), the Project design would create a scale, form, and mass suited to the resort-alpine character of the site and the adjacent land uses. As part of the approval process, the Town will review the location of the proposed structures, bulk/massing, use of building materials, colors, and landscaping to ensure consistency with the Town Development Code. Landscaping would incorporate native trees and shrubs to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas. Planting on the Project site would use native conifers, deciduous trees, and shrubs.</p>
<p>1B-2 The Town shall include more recreation programs designed specifically for the short duration visitor and second homeowner.</p>	<p>Consistent. The Project will provide recreation programs for the short duration visitor and second homeowner.</p>
<p>2A-2 The Town shall retain, to the maximum practical extent, primary community water-courses and bodies in their natural state, through criteria in the Town Development Code. Creek corridors should be carefully identified, corridor setbacks established and strict regulations precluding riparian vegetation removal and creek regimen modification should be adopted.</p>	<p>Consistent. The Store and associated facilities would be located away from Mammoth Creek and would not impact any jurisdictional wetland and waters features. Refer to Section IV.D (Biological Resources) for details.</p>
<p>2B-1 The Town shall encourage developers to provide not only project related recreational facilities, but public recreation facilities, including those projects identified in the Needs Assessment like playfields, parks and trails, through requirements and conditions in the Town Development Code.</p>	<p>Consistent. The Project provides for some public recreational facilities including sidewalks adjacent to public roadways.</p>
<p>2B-7 The Town shall seek cooperative arrangements with other public and private recreation providers to enable greater use of available facilities for community recreation programs.</p>	<p>Consistent. Although the Resident's Club is only available to Snowcreek residents and Hotel visitors, the Project provides for public recreational facilities including the Golf Course, Hotel restaurants, spa and wellness center, meeting rooms, ice-skating pond, trailhead access, and outdoor equipment rental.</p>
<p>2C-1 The Town shall establish an effective trails network which connects frequently used destinations and follows heavily traveled routes. Trails shall be established whenever possible: 1) along scenic routes, 2) between recreation and visitor residential nodes, 3) to public facilities, areas of cultural, educational, recreational and historic interest, and 4) to campgrounds, camping areas, forest and wilderness areas.</p>	<p>Consistent. As discussed in Section III, Project Description, the Project would include a pedestrian and bicycle system with interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods.</p>

**Table IV.H-2
Comparison of Project Characteristics to Applicable Policies in the 1987 General Plan**

Objective/Policy	Consistency Discussion
2C-2 The Town shall develop a trails plan and system which provides for bikeway and pedestrian paths for use during summer and ski trails in the winter.	Consistent. The pedestrian and bicycle system would include interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods.
2C-5 The Town may require new development and to the extent feasible, existing uses which are redeveloping, to 1) provide non-motorized path easements to develop paths in conformance with an adopted non-motorized transit plan, 2) provide crosswalk striping, and 3) provide lighting for safe pedestrian use of paths.	Consistent. The Project would provide non-motorized path easements, crosswalk striping, and lighting for safe use of pedestrian paths.
2C-6 The Town shall enhance the non-motorized path and trail experience by providing for: a) safe and aesthetically placed paths and trails through appropriate and environmentally sensitive design, b) control of user access to private property through screens, berms, signage, barriers, and enforcing proper trail use, c) amenities for recreational enjoyment such as picnic areas, benches, exercise facilities, where appropriate, d) diverse path and trail activities, e) bicycle racks, hitching posts and other fixtures designed to promote non-motorized transportation shall be incorporated into commercial uses where appropriate (Transportation 9 Policy S10).	Consistent. See response to Policy 2C-5.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
ECONOMY ELEMENT	
Economic Development Policies	
E.1.D Encourage restaurants, retail, entertainment, lodging, and services.	Consistent. The Snowcreek Master Plan proposes areas of commercial development including 75,000 square feet of non-residential space including a Store, Interpretive Center, Hotel (including 250 Hotel room/suite units and 150 Private Residence Club [PRC]/suite units), Spa/Wellness Center, retail uses, restaurant, conference and meeting space, Resident’s Club, golf course, golf pro shop, and Outfitters’ Cabin.
Marketing, Promotion and Special Events	
E.1.L Support diverse arts, cultural, and heritage programming, facilities and development of public venues for indoor and outdoor events.	Consistent. The Project proposes an Interpretive Center, which would provide cultural and historic information about the area, a conference and meeting space for indoor events, and Outfitters’ Cabin, which would provide public access to the Inyo National Forest and the Sherwin Range.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
E.2.A Support a range of outdoor and indoor events, facilities, and services that enhance the community's resort economy.	Consistent. The Project proposes facilities and services for indoor events including conference and meeting space, and areas for outdoor events including an ice skating rink and other public spaces. See response to Policy E.1.D and E.1.L.
Diversify Economy	
E.3.B Support inclusion of cultural and educational institutions as components of mixed use developments.	Consistent. See response to Policy E.1.L. These amenities would provide visitors with information about the town and Project area and the various cultural and recreational amenities available.
E.3.C Support development of major public and private facilities that contribute to destination resort visitation in Mammoth Lakes.	Consistent. See response to Policy E.1.D and E.1.L. The Project proposes several major land use types including residential, commercial, retail, recreation, and hotel/resort uses, including a luxury Hotel, wellness center, spa, and conference facilities. The Project would integrate a mix of residential types within distinct neighborhood contexts. Additionally, the Project would include multiple options for recreational amenities, including a golf course, multi-use trails, Resident's Club, spa, ice skating pond, and access to hiking, biking, fishing, cross country skiing, and snow-shoeing activities in the Inyo National Forest and the Sherwin Range. These facilities would contribute to the Town's identity as a resort destination.
E.3.D Encourage adequate and appropriate commercial services for residents and visitors.	Consistent. See response to Policy E.1.D and E.3.C.
Business and Employment	
E.3.E Support establishment and expansion of industries complementary to the community, its environment and economy.	Consistent. See response to Policy E.1.D. The Project would expand an existing recreation node (Golf Course) in proximity to the proposed residential uses, with multiple options for recreational amenities including the expanded Snowcreek Golf Course, Resident's Club, and Outfitters' Cabin (providing outdoor equipment rental and trail head access/parking). The Project also proposes 75,000 square feet of non-residential space. These uses would complement and expand existing commercial and recreational activities in the town and would be developed in an environmentally friendly manner by being located near residential uses, incorporating energy efficient materials and practices, and would contribute to the economy of the Town and region.
E.3.J Continue to attract a diversified labor force through a mix of housing types and housing affordability.	Consistent. The Project proposes construction of a variety of recreation visitor and commercial recreation-employee housing. Proposed residential uses include low-, medium-, and high-density residential development (condominiums and townhomes), a Private Residence Club (PRC)/suite units, and Hotel accommodations. Of the residential development, 80 units would be allocated as on-site workforce housing.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
ARTS, CULTURE, AND HERITAGE	
Rich Community Culture	
A.1.A Encourage and support a wide variety of visual and performing arts, cultural amenities, events and festivals, and forums for local arts organizations.	Consistent. The Project includes a conference center and meeting facilities, which would provide a space for festivals and events. See response to Policy E.1.D and E.1.L.
Expressive of Community	
A.2.B Encourage development of arts, culture, and heritage facilities and venues.	Consistent. See response to Policy E.1.D and E.1.L.
A.2.C Support local history and heritage education in the community.	Consistent. See response to Policy E.1.L.
A.2.D Be stewards of the cultural, historical and archeological resources in and adjacent to town.	Consistent. The Project includes the Interpretive Center. The Interpretive Center would include an interactive educational facility, providing residents and visitors with information and exhibits regarding the history and resources of Mammoth Lakes and the Mammoth Creek Corridor.
COMMUNITY DESIGN	
Celebrate Public Spaces	
C.2.A Create well-designed and significant public spaces in resort/commercial developments to accommodate pedestrians and encourage social interaction and community activity.	Consistent. The Project would include a pedestrian and bicycle system with interior trails and sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods. Public outdoor spaces would be designed to connect community members and allow for community activities including activities such as ice skating displays, art fairs, or farmer's markets.
C.2.B Maximize opportunities for public spaces that support community interaction, such as outdoor cafe and restaurant patios, performance and arts spaces, and child activity centers through public-private partnerships.	Consistent. The Project would provide multiple options for recreational amenities including the expanded Snowcreek Golf Course, Resident's Club, and Outfitters' Cabin (providing outdoor equipment rental and trail head access/parking) that support community interaction. The Project also proposes 75,000 square feet of non-residential space with restaurants, cafes, conference center and skating rink.
C.2.C Encourage development of distinct districts, each with an appropriate density and a strong center of retail, services or amenities.	Consistent. The Project is consistent with the underlying commercial design concepts expressed in this policy. The Project proposes a Master Plan providing for the completion of a master planned community including residential neighborhoods, commercial uses, hotel/resort uses, recreational amenities, and a trail/roadway system as proposed in the Master Plan for the Project site. The Project would integrate a mix of residential types within distinct neighborhood contexts. The Project would cluster medium and higher density residential units in the center of the development area, with lower density residential located adjacent to open space to preserve open space and provide for the transition of high- to low-density uses adjacent to open space areas. The Project

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
	would further integrate residential development with a natural environment by emphasizing an architectural style appropriate to the climate and natural setting of the Eastern Sierra. Traditional tools of California architecture would be encouraged, including rugged stone building bases, and expressive detailing at roof edges, balconies, window trims, and doorways. The goal would be a distinctive building architecture that is executed with materials, colors, and finishes, appropriate to the local environment. The Project would expand an existing recreation node (Golf Course) in proximity to the proposed residential uses, with multiple options for recreational amenities including the expanded Snowcreek Golf Course, Resident's Club, and Outfitters' Cabin (providing outdoor equipment rental and trail head access/parking). The Project proposes 75,000 square feet of non-residential space.
C.2.D Preserve and enhance special qualities of districts through focused attention on land use, community design and economic development.	Consistent. The Project would complement the design of the existing Snowcreek Master Plan area by being consistent with design for the area, proposing land uses in an efficient fashion, and contributing to the resort environment of the Town.
C.2.E Ensure that each district center is an attractive destination that is comfortable and inviting with sunny streets, plazas and sidewalks.	Consistent. See response to Policy C.2.C. The Project would include a pedestrian and bicycle system with interior trails and some sidewalks fronting internal streets as well as connecting trails from recreational amenities, outdoor spaces and neighborhoods.
C.2.G Ensure that development in commercial areas provides for convenient pedestrian movement between adjoining and adjacent properties.	Consistent. See response to Policy C.2.E.
C.2.H Support transit ridership and pedestrian activity by emphasizing district parking, shared parking, mixed use and other strategies to achieve a more efficient use of land and facilities.	Consistent. The Project is consistent with the underlying concepts expressed in this policy by proposing several major land use types including residential, commercial, retail, recreation, and hotel/resort uses near transit stops. Additionally, the Project would provide pedestrian and bicycle connections to transit stops. The extent to which the Project proposes a balanced expansion of all major land use types, coordinated with commercial recreation development, would be contemplated by the Town during Project review and/or consideration. Short-term surface parking would be provided adjacent to check-in locations with long-term parking located under the major residential buildings to efficiently use land on the Project site. Some buildings may share check-in and parking access. Parking for the Golf Course would be provided through the Hotel parking.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Celebrate the Spectacular Natural Surroundings	
C.2.I Achieve highest quality development that complements the natural surroundings by developing and enforcing design standards and guidelines.	Consistent. As noted in Section IV.B (Aesthetics), the Project would result in significant unavoidable impacts to scenic vistas. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. As part of the approval process, the Town will review the location of the proposed structures and bulk/massing to determine if this impact can be reduced, and will review the use of building materials, colors, and landscaping to ensure consistency with the Town Development Code. Landscaping would incorporate some native trees and shrubs to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas. Planting on the Project site would use some native conifers, deciduous trees, and shrubs.
C.2.J Be stewards in preserving public views of surrounding mountains, ridgelines and knolls.	Inconsistent. Although the Hotel would not exceed 120 feet in height and would be located at a distance from Old Mammoth Road, the Project would result in significant unavoidable impacts to public views of the meadow and the surrounding mountains. Although residential buildings would be two- or three-stories in height and would not obscure views of the surrounding mountains, they would obscure some views of the meadows and foothills in the distant foreground. However, the location and massing of the proposed structures would be consistent with the Town's Design Guidelines and the General Plan policies under Neighborhood and District Character, Snowcreek. Additionally, the Project includes revisions to the Zoning Ordinance. If those revisions are approved, the height of the Hotel would be consistent with the height limitation in the Town's Zoning Code. In addition, in the 2007 General Plan, Neighborhood and District Character Snowcreek, 5.5.b, the Town notes that it desires "a variety of resort lodging supported by restaurants, resort services, neighborhood conveniences, commercial, retail, and outdoor ancillary recreation designed as a traditional small-scale village... b. Dispersed structures, light on the land, vertical emphasis and detailing (not heavy or strong horizontality)." The Project is designed to meet this desired characteristic and role.
C.2.L Create a visually interesting and aesthetically pleasing built environment by requiring all development to incorporate the highest quality of architecture and thoughtful site design and planning.	Consistent. See response to Policy C.2.I.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
C.2.M Enhance community character by ensuring that all development, regardless of scale or density, maximizes provision of all types of open space, particularly scenic open space.	Consistent. The Project would organize residential uses into a series of clustered neighborhoods (including low-, medium-, and high-density residential development) with open, landscaped areas interspersed among commercial and resort uses, and recreational amenities. The Project would provide for sensitive transitions between residential and other land uses through open space dedication including the golf course and design.
C.2.N Plan the siting and design of buildings to preserve the maximum amount of open space, trees and natural features to be consistent with themes and district character.	Consistent. The Project design would create a scale, form, and mass suited to the resort-alpine character of the site and the adjacent land uses. The Project would cluster development to preserve and maximize open, landscaped areas interspersed among commercial and resort uses, and recreational amenities. Few trees exist on the Project site. As part of the approval process, the Town will review the grading plans to assess the need for removal of any trees. Additionally the Town will review all landscaping plans to ensure that some native trees and shrubs are used to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas.
C.2.O Site development adjustments may be considered to preserve significant groups of trees or individual specimens. Replanting with native and compatible non-native trees to mitigate necessary tree removal is required.	Consistent. See response to Policy C.2.N.
C.2.Q Design development so that public spaces contribute to an overall sense of security and lack of vulnerability to crimes of opportunity.	Consistent. Design for the Project would be consistent with traditional approaches for the region, would address current needs, codes, regulations, and environmental considerations; would enhance the user experience, safety, and enjoyment; and would contribute to adequate buffering as needed.
C.2.R Plan parks for safety and compatibility with adjacent uses through thoughtful design including location of buildings, lighting, parking, emergency access, public transit and pedestrian/ bicycle access.	Consistent. See response to Policy C.2.Q.
C.2.S Ensure that pedestrian facilities have adequate non-glare lighting, visible signage and markings for pedestrian safety.	Consistent. The proposed Project would include an Outdoor Lighting Plan to ensure compliance with the Town's Lighting Ordinance (Chapter 17.34 of the Municipal Code). Excessive illumination would be avoided and lighting would be designed and placed to minimize glare and reflection. The Project is subject to design review by the Town Community Development Department, which would consider the adequacy of signage and markings for pedestrian safety.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Distinctive Architecture	
C.2.T Use natural, high quality building materials to reflect Mammoth Lakes' character and mountain setting.	Consistent. See response to Policy C.2.C. and C.2.I.
C.2.U Require unique, authentic and diverse design that conveys innovation and creativity and discourages architectural monotony.	Consistent. See response to Policy C.2.C. and C.2.I.
Comfortable Building Height, Mass, and Scale	
C.2.V Building height, massing and scale shall complement neighboring land uses and preserve views to the surrounding mountains.	Inconsistent. See response to Policy C.2.J.
C.2.W Maintain scenic public views and view corridors as shown in Figures 1 and 2 that visually connect community to surroundings.	Inconsistent. See response to Policy C.2.J.
C.2.X Limit building height to the trees on development sites where material tree coverage exists and use top of forest canopy in general area as height limit if no trees on site.	Consistent. There are no trees on the portion of the site south of Old Mammoth Road. Therefore, development of any height on that portion of the site would not conflict with this policy. Development on the portion of the site north of Old Mammoth Road would not be in excess of forest canopy in the general area.
Community Design and Streetscape	
C.3.B Require distinctive design features at unique sites such as mountain portals, the terminus of a public view and other important public spaces and social gathering places.	Consistent. The Town will review the location of the proposed structures, bulk/massing, use of building materials, colors, and landscaping to ensure consistency with the Town Development Code which strives to protect major view corridors and major landscape characteristics.
C.3.C Maintain public rights-of-way for use by the public. Full or partial street closures by buildings, utilities, ramps or other facilities may be allowed for public plazas, parks or open space.	Consistent. Conceptual drawings show that no roads will be closed. Design-level details including all roadway, pedestrian, and bicycle facilities would be reviewed by the Town for functionality in a mountain climate.
C.3.D Development shall provide pedestrian-oriented facilities, outdoor seating, plazas, weather protection, transit waiting areas and other streetscape improvements.	Consistent. See response to Policy C.2.H., C.2.I. and C.2.C.
C.3.E Ensure that landscaping, signage, public art, street enhancements and building design result in a more hospitable and attractive pedestrian environment. Require an even higher level of design quality and detail in commercial mixed use areas.	Consistent. See response to Policy C.2.S. and C.2.N.
C.3.F Underground utilities within the community.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All utilities would be located underground and would be reviewed by the Town for consistency with Design Guidelines.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Natural Environment	
C.4.A Development shall be designed to provide stewardship for significant features and natural resources of the site.	Consistent. See response to Policy C.2.I and C.2.N.
C.4.B To retain the forested character of the town, require use of native and compatible plant species in public and private developments and aggressive replanting with native trees.	Consistent. See response to Policy C.2.N.
C.4.C Retain overall image of a community in a forest by ensuring that native trees are protected wherever possible and remain an important component of the community.	Consistent. See response to Policy C.2.N.
C.4.D Retain the forested character of the town by requiring development to pursue aggressive replanting with native trees and other compatible species.	Consistent. See response to Policy C.2.N.
Night Sky, Light Pollution, and Glare	
C.5.A Require outdoor light fixtures to be shielded and down-directed so as to minimize glare and light trespass.	Consistent. See response to Policy C.2.S.
C.5.C Improve pedestrian safety by eliminating glare for motorists through use of non-glare roadway lighting. A light fixture's source of illumination shall not be readily visible at a distance. Number of fixtures used shall be adequate to evenly illuminate for pedestrian safety.	Consistent. See response to Policy C.2.S.
Quiet Community	
C.6.A Minimize community exposure to noise by ensuring compatible land uses around noise sources.	Consistent. As noted in Section IV.I. (Noise), the proposed residential uses within the Project site would not be exposed to traffic noise levels exceeding 60dB L _{dn} .
C.6.B Allow development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worstcase noise levels, either existing or future, with future noise levels to be predicted based on projected 2025 levels.	Consistent. The Project would be in compliance with the Town's noise ordinances.
C.6.C Development of noise-sensitive land uses shall not be permitted in areas where the noise level from existing stationary noise sources exceeds the noise level standards described in the Noise Element.	Consistent. Existing stationary sources do not exceed the noise level standards of Table VII (refer to Section IV.I. (Noise)).
C.6.F Require mitigation of all significant noise impacts as a condition of project approval.	Consistent. See response to Policy C.6.B.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
C.6.G Require preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all proposed projects that may result in potentially significant noise impacts.	Consistent. A noise analysis was prepared for the Project to ensure compliance with the Town’s noise ordinances.
NEIGHBORHOOD AND DISTRICT CHARACTER	
Snowcreek	
<p>The Snowcreek District should not act as an exclusive development, but connect to the larger community and provide community access to Snowcreek and to surrounding public lands. Snowcreek should be designed to be a livable neighborhood, including workforce housing, convenience retail, public amenities, and active/passive recreation facilities. Snowcreek should contribute to the town’s overall economy, tourism and mix of recreation amenities while preserving the area’s unique features.</p> <p>Snowcreek characteristics:</p> <ol style="list-style-type: none"> 1. Western range and meadow spacious setting, broad and wide open with backdrop of Sherwin Range 2. Anchor for and a greater connection to Old Mammoth District 3. Stress stewardship of land and resources 4. Provide access and staging areas to Sherwin Range and “community” uses accessible from Old Mammoth Road 5. A variety of resort lodging supported by restaurants, resort services, neighborhood conveniences, commercial, retail, and outdoor ancillary recreation designed as a traditional small-scale village: <ol style="list-style-type: none"> a) Active day and evening and through all four seasons b) Dispersed structures, light on the land, vertical emphasis and detailing (not heavy or strong horizontality) c) Landscape that reinforces sage, manzanita and wet meadow 6. Full service four-season resort with visitor/recreation amenities such as: <ol style="list-style-type: none"> a) Horseback, sleigh and hay wagon rides, golf and tennis b) Clubhouse with food and beverage service c) Special events “town commons” d) Center for arts and culture 7. Integrated with Mammoth Creek Park and Mammoth Creek Corridor, the historical museum site, equestrian center, parking, trails, 	<p>Consistent. Development on the Project site would be clustered to provide areas of range and meadow and to allow views of the Sherwin Range. Snowcreek would provide an anchor for and a greater connection to Old Mammoth District by providing commercial and residential land uses that attract people and by providing vehicle and trail connections from Snowcreek to the Town’s greater roadway and trail system. The Project would protect resources on the site including biological resources, cultural resources, and water quality through the inclusion of mitigation measures, thereby stressing stewardship of land and resources. The Outfitters’ Cabin would provide access and staging areas to Sherwin Range and “community” uses accessible from Old Mammoth Road. The Project would develop a variety of resort lodging, including restaurants, resort services, neighborhood conveniences, activities, and outdoor recreation that would attract visitors during the day and evening and through all four seasons. Landscaping would incorporate native trees and shrubs to revegetate disturbed areas, to buffer or frame views to allow summertime shading of outdoor places, to allow transition in scale and to soften building massing, and to introduce decoration and color into outdoor use areas. Planting on the Project site would use native conifers, deciduous trees, and shrubs. Lastly, the Project would be integrated with Mammoth Creek Park, Mammoth Creek Corridor and the Sherwin Meadow Equestrian Center, and would include a historical interpretive center, and would provide parking, trails, and snow play areas adjacent to the Sherwin Range and Inyo National Forest lands. The Project has dispersed structures and a strong vertical emphasis with a 120-foot Hotel.</p>

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
and snow play, and future possibilities such as a recreation center or amphitheater.	
LAND USE	
Livability	
L.1.A Limit total peak population of residents, visitors, and employees to 52,000 people.	Consistent. The Project would result in the construction of 1,050 dwelling units. This number is less than originally proposed for the Snowcreek area. The Project is consistent with Draft 2007 General Plan population projections and would contribute approximately ten percent to future build-out development. It is not expected that the nature of the jobs created by the Project would result in an influx of employees from other areas. Therefore, the increase in population and jobs would be less than, but still consistent with the projections of the General Plan.
L.1.B Require all development to meet community goals for highest quality of design, energy efficiency, open space preservation, and promotion of a livable, sustainable community. Development that does not fulfill these goals shall not be allowed.	Consistent. See response to Policy C.2.I., C.2.C., Neighborhood and District Character Snowcreek, R.6.A, and R.10.A. In the 2007 General Plan, Neighborhood and District Character Snowcreek, 5.5.b, the Town notes that it desires “a variety of resort lodging supported by restaurants, resort services, neighborhood conveniences, commercial, retail, and outdoor ancillary recreation designed as a traditional small-scale village... b. Dispersed structures, light on the land, vertical emphasis and detailing (not heavy or strong horizontality).” The proposed height of the Hotel is designed to address this desired characteristic and role.
L.1.C Give preference to infill development.	Consistent. The Project is located towards the edge of Town, bordered by undeveloped lands to the east, and can not truly be considered as infill development. However, the Project would complete the Snowcreek Master Plan and would fulfill development plans for the area that have been contemplated since 1974.
L.1.D Conduct district planning and focused studies for special areas and sites within the community to aid in future planning.	Consistent. The Project areas has been studied and is included as an area to be master planned and developed with resort uses consistent with Neighborhood and District Character, Snowcreek. If a district plan is required, it will be prepared in accordance with Town’s procedure for district planning.
L.2.A Emphasize workforce housing for essential public service employees, such as firefighters, police, snow removal operators, and teachers.	Consistent. The Project would integrate 80 units of workforce housing into the mix of housing types and contribute payment of in-lieu fees to assist in the development of the balance of required affordable units to be located off-site in an undetermined location.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
L.2.B Encourage a mix of housing types and forms consistent with design and land use policies.	Consistent. The Project would integrate a mix of residential types within distinct neighborhood contexts consistent with Town design and land use policies. Proposed residential uses include low-, medium-, and high-density residential development (condominiums and townhomes), a Private Residence Club (PRC)/suite units and hotel accommodations. See response to Policy C.2.X. and C.2.I.
Small Town Character	
L.3.A Achieve a diversity of uses and activities and efficient use of land by maintaining a range of development types.	Consistent. The Project would develop a variety of resort lodging, including restaurants, resort services, neighborhood conveniences, activities, and outdoor recreation that would attract visitors during the day and evening and through all four seasons. See response to Policy C.2.C., C.2.I., and Neighborhood and District Character.
L.3.B Develop vital retail centers and streets.	Consistent. See response to Policy L.3.A.
L.3.C Encourage development of small neighborhood-serving retail and services dispersed through town.	Consistent. See response to Policy C.2.C., C.2.I., and Neighborhood and District Character.
L.3.D Encourage outdoor dining in resort and commercial districts to increase street level animation.	Consistent. See response to Policy C.2.B., and Neighborhood and District Character discussion.
L.3.F Ensure appropriate community benefits are provided through district planning and development projects.	Consistent. See response to Policy L.1.D. The Project would provide community benefits such as additional facilities including an ice skating pond, wellness center/spa, expanded golf course, and access to trails in the Sherwin Range and Inyo National Forest lands that would provide hiking, mountain biking, cross-country skiing, and snowshoeing opportunities.
L.3.G Do not allow the transfer of unused density from built parcels.	Consistent. Although the Project includes the transfer of density from previously constructed portions of the Snowcreek Master Plan area, clustering of density and density transfers are allowed within master plan areas. The Project would be reduced by 137 units under the allowable density even without the density transfer.
L.3.H Density may be clustered or transferred through clearly articulated district plans to enhance General Plan goals and policies.	Consistent. The Project area is included in the Snowcreek Master Plan and proposes the transfer of unused density from previously constructed portions of the site to allow for clustering of residential units in order to maximize open space areas on the site.
Accommodations and Community Amenities	
L.5.A Encourage and support a range of visitor accommodations that include a variety of services and amenities.	Consistent. The Project is consistent with the underlying concepts expressed in this policy of providing visitor housing and recreation amenities. The Snowcreek Master Plan proposes areas of commercial development including 75,000 square feet of non-residential space including a Store, Interpretive Center, Hotel,

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
	Spa/Wellness Center, retail uses, restaurant, conference and meeting space, golf pro shop, and Outfitters' Cabin.
L.5.B Locate visitor lodging in appropriate areas.	Consistent. The Project would cluster medium and higher density residential units in the center of the development area, with lower density residential located adjacent to open space to preserve open space and provide for the transition of high- to low-density uses adjacent to open space areas.
L.5.C Ensure there are an adequate number of units available for nightly rental.	Consistent. The Project would include the construction of a 400-room/suite Hotel (including 250 hotel room/suite units and 150 Private Residence Club [PRC]/suite units).
L.5.E Development shall complement and diversify the range of resort community activities and amenities.	Consistent. See response to Policy L.5.A.
L.5.F Require all multi-family, resort, and specific plan development to include activities, amenities and services to support long-term visitation.	Consistent. See response to Policy L.5.A.
Urban Growth Boundary	
L.6.A No residential, commercial, or industrial development is permitted outside the Urban Growth Boundary (UGB) identified in Figure 4.	Consistent. All commercial and residential development would be located inside the UGB. The Golf Course would be located outside the UGB.
L.6.B Recreation facilities, other public facilities, and public utility installations may be permitted outside of the UGB when determined to be in the public interest and compatible with Town goals.)	Consistent. See response to Policy L.6.A.
L.6.C. Policy: The Town shall work collaboratively with Mono County, Inyo National Forest, and the Bureau of Land Management to ensure that land uses occurring adjacent to the Urban Growth Boundary shall be compatible with Town goals.	Consistent. The Town will review the location of the proposed structures, bulk/massing, use of building materials, colors, and landscaping to ensure consistency with the Town Development Code which strives to protect major view corridors and major landscape characteristics.
MOBILITY	
Regional Transportation	
M.2.A Maintain and expand access to recreation areas via coordinated system of shuttle and bus services, scenic routes, trails and highways.	Consistent. Bus stops and shelters would be located throughout the Project site. The Outfitters' Cabin and trailhead would provide access to public cross-country and snow shoeing trails of the Sherwin Range and Inyo National Forest.
In-Town Transportation	
M.3.A Maintain a Level of Service D or better on the Peak Design Day at intersections along arterial and collector roads.	Consistent. Implementation of the mitigation measure proposed in Section IV.M (Traffic and Circulation) would be required in order to improve the LOS to an acceptable LOS D and to reduce Project impacts on the study area street system to a less than significant level.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
<p>M.3.B Reduce automobile trips by promoting and facilitating:</p> <ul style="list-style-type: none"> • Walking • Bicycling • Local and regional transit • Innovative parking management • Gondolas and trams • Employer-based trip reduction programs • Alternate work schedules • Telecommuting • Ride-share programs • Cross-country Skiing and Snowshoeing 	<p>Consistent. The Project is consistent with this policy by including a bicycle and pedestrian system that would connect to existing on-site bikeways and to other Town bikeways to create safe continuous routes. The Project site is currently served for transit by Mammoth Lakes Transit Red Line. Bus stops and shelters would be located throughout the Project site. The Outfitters' Cabin and trailhead would provide access to cross-country and snow shoeing trails of the Sherwin Range and Inyo National Forest. The Project would include some retail uses that would help to reduce automobile trips by allowing residents to purchase necessities on-site.</p>
<p>M.3.C Reduce automobile trips by promoting land use and transportation strategies such as: implementation of compact, pedestrian-oriented development; clustered and infill development; mixed uses and neighborhood-serving commercial mixed use centers.</p>	<p>Consistent. The Project would encourage reduction in automobile trips by clustering development, providing some neighborhood-serving commercial uses near the Hotel, and providing pedestrian and bicycle facilities to encourage alternative transportation modes to other commercial uses such as the Market and located in other areas of Town.</p>
<p>M.3.D Encourage visitors to leave vehicles at their lodging by developing pedestrian, bicycle, transit and parking management strategies.</p>	<p>Consistent. See response to Policy M.3.B and M.3.C.</p>
<p>M.3.E Require development to implement Transportation Demand Management (TDM) measures.</p>	<p>Consistent. The Project would include TDM measures such as pedestrian and bicycle facilities and transit service and facilities.</p>
<p>M.3.F Encourage the school district, ski resort and other major public and private traffic generators to develop and implement measures to change travel behavior.</p>	<p>Consistent. See response to Policy M.3.B, M.3.C., and M.3.E.</p>
<p>M.3.G Construction activities shall be planned, scheduled and conducted to minimize the severity and duration of traffic impediments.</p>	<p>Consistent. As a condition of approval, Project construction activities shall be planned and scheduled and will be limited to set hours.</p>
<p>M.3.H Commercial developments shall not allow delivery vehicles and unloading activity to impede traffic flow through adequate delivery facilities and/or delivery management plans.</p>	<p>Consistent. Service vehicles would be routed and managed to minimize conflicts with the Project's visitor activities and local traffic. All buildings would be serviced from internal roadways with the exception of the Store, which would have a service driveway off of Old Mammoth Road, and the Outfitters' Cabin, which would be accessed from Sherwin Creek Road. The Hotel would have designated central facilities for service delivery and waste management. Service areas would be designed to accommodate required service vehicle sizes.</p>

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Walking and Bicycling	
M.4.A Improve safety of sidewalks, trails and streets.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed roadway and pedestrian facility system would be reviewed by the Town to ensure that a safe movement of people is maintained.
M.4.B Provide a high-quality pedestrian system linked throughout the community with year round access.	Consistent. The Project would include a bicycle and pedestrian system that would connect to existing on-site bikeways and to other Town bikeways to create safe continuous routes.
M.4.C Design streets, sidewalks and trails to ensure public safety such as: <ul style="list-style-type: none"> • adequate dimensions and separation • glare-free lighting at intersections • directional and informational signage • trash receptacles • benches • shuttle shelters • protected roadway crossings • landscaping • groomed community trails • remove snow from sidewalks 	Consistent. See response to Policy M.3.B. and M.3.C.
M.4.D Provide safe travel for pedestrians to schools and parks.	Consistent. The Project is consistent with this policy by including a multi-use pedestrian/bicycle trail system that would connect to existing multi-use trails to create safe continuous routes.
M.4.E Development shall improve existing conditions to meet Town standards.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed roadway system would be reviewed by the Town to ensure consistency with its design standards.
Transit System	
M.5.A Expand and increase reliability of transit service to meet the needs of the community and visitors.	Consistent. The Project would be required to pay an annual Transit and Transportation Fee to the Town as part of the Conditions of Approval.
M.5.B Encourage transit use by requiring development and facility improvements to incorporate such features as shelters, safe routes to transit stops, year-round access, etc.	Consistent. Bus stops and shelters would be located throughout the Project site. Design, location and implementation will be reviewed and approved by the Town.
M.5.C Increase availability of transit services by working collaboratively with other agencies and organizations.	Consistent. The applicant is working collaboratively with the Red Line to provide transit service to the Project site. Bus stops and shelters are will be located throughout the Project site.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Parking	
M.6.A Develop efficient and flexible parking strategies to reduce the amount of land devoted to parking.	Consistent. The Project proposes both surface and understructure parking and provides for bus stops, as well as pedestrian trails and sidewalks.
M.6.B Support development of strategically located public parking facilities.	Consistent. The Mammoth Mountain Ski Area (MMSA) has agreed to alter the MMSA operated bus route that serves the Old Mammoth/Snowcreek area such that it enters the Project to provide service to the Hotel guests and residents (see Appendix J).
Streets	
M.7.A Install traffic control and safety operational improvements at intersections on arterial roads as required to meet the above levels of service.	Consistent. Implementation of the mitigation measure proposed in Section IV.M (Traffic and Circulation) would be required in order to improve the LOS to an acceptable LOS D and to reduce Project impacts on the study area street system to a less than significant level.
M.7.B Design and develop a functional hierarchy of arterial, collector, and local streets and rights-of-way including mid-block connectors.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed roadway system would be reviewed by the Town to ensure that a functional hierarchy of arterial, collector, and local streets and rights-of-way is maintained.
M.7.C Improve substandard roadways to Town standards.	Consistent. See response to Policy M.7.A.
M.7.D Monitor impact of development on local and regional traffic conditions and roadway network to plan for future improvements in network.	Consistent. A traffic impact analysis was prepared for the Project to assess potential impacts to roadways. The Project would incorporate future improvements to accommodate future traffic.
M.7.E Require all development to construct improvements and/or pay traffic impact fees to adequately mitigate identified impacts. Mitigation of significant project-related impacts may require improvements beyond those addressed by the current Capital Improvement Program and Town of Mammoth Lakes Air Quality Management Plan and Particulate Emissions Regulations.	Consistent. The Project proposes the installation of a traffic roundabout (Section IV.M, Traffic and Circulation) in order to improve the LOS to an acceptable LOS D and provide for the efficient movement of traffic. See response to Policy M.7.A.
M.7.F Plan new and/or reroute existing streets and circulation facilities where required by new development or to achieve circulation objectives.	Consistent. The Project internal access roads will be privately owned and maintained consistent with the Town Development Code, in consideration of the climatic extremes of the region.
M.7.G Identify and protect future public rights-of-way and facilities in development.	Consistent. The Project site plans will be reviewed by the Town to ensure that future public rights-of-ways are protected.
M.7.H Development shall dedicate, design and construct internal and adjacent streets, sidewalks and trails to Town standards.	Consistent. See response to Policy M.7.F.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Traffic Calming	
M.8.A Encourage traffic-calming techniques that protect residential neighborhoods and streets, enhance public safety, maintain small-town character, and enhance resort design objectives.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed roadway and pedestrian facility system would be reviewed by the Town to ensure that residential neighborhoods and streets are protected, public safety is enhanced, and to enhance and maintain small-town character.
M.8.B Facilitate implementation of traffic-calming techniques by encouraging development of public private partnerships and pilot projects.	Consistent. The Project proposes the installation of a traffic roundabout (Section IV.M, Traffic and Circulation) for traffic calming and to improve LOS at the intersection. The Project would also include pedestrian facilities and lighting to provide for safe and efficient movement of traffic and pedestrians.
Snow Management	
M.9.A Require snow management methods that minimize environmental damage while optimizing road and pedestrian safety.	Consistent. The Project would incorporate snow management devices and roof drainage systems in the roof and building design, so that snow will not be permitted to shed freely into active pedestrian or vehicular areas.
M.9.B Increase year round pedestrian access to sidewalks and transit stops.	Consistent. See response to Policy M.9.A.
M.9.C Support development of geothermal and solar heating opportunities for snow removal.	Consistent. The Project applicant is exploring the use of geothermal heating opportunities for both heating and snow removal.
PARKS, OPEN SPACE, AND RECREATION	
A Town Within a Park	
P.2.B Require usable public recreation open space in all master planned developments.	Consistent. The Project would include multi-use trails, golf course, skating rink, spa/wellness center, Outfitters' Cabin, and access to public trails in the Inyo National Forest and Sherwin Range.
P.2.C Maximize parks and open space through flexible form-based zoning, development clustering and transfers of development rights (TDRs).	Consistent. The Project would cluster development on the Project site to maximize open space areas on the site north of Old Mammoth Road. The open space on the Project site south of Old Mammoth Road is protected from residential and commercial development by the land use covenant established in 2005.
P.2.D Increase understanding and appreciation of the cultural, natural and historical resources of the region and Town through development of programs, facilities and interpretive signage.	Consistent. The Project includes the Store and Interpretive Center. The Interpretive Center would include an interactive educational facility, providing residents and visitors with information and exhibits regarding the history and resources of Mammoth Lakes and the Mammoth Creek Corridor. The Store would draw inspiration from the historic Lutz Market during the early settlement days of Mammoth Camp. These facilities would increase understanding and appreciation of cultural, natural, and historic resources in the Town.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
P.3.A Ensure public routes for access to public lands are provided in all developments adjacent to National Forest lands.	Consistent. The Project proposes the Outfitters' Cabin, which would provide public access to the Inyo National Forest and Sherwin Mountains.
P.3.C Identify and acquire points of public access to public lands (from within the Urban Growth Boundary [UGB] to surrounding public lands) through cooperative arrangements including easements, purchase, or other means of title acquisition.	Inconsistent. The Project applicant has proposed to provide a location for public access to the Sherwin Range and Inyo National Forest along the eastern edge of the Project site which is outside the UGB. That access, while not as convenient as the current access points and routes, will be permitted and lawful and will be enhanced with a the Outfitters' Cabin that will provide opportunities for persons entering those public lands to rent ski equipment and other sports equipment.
Recreational Opportunities	
P.4.A Expand recreational opportunities by proactively developing partnerships with public agencies and private entities.	Consistent. The Project would include multi-use trails that link to existing Town trails, golf course, ice skating rink, spa/wellness center, Outfitters' Cabin, and access to public trails in the Inyo National Forest and Sherwin Mountains.
P.4.B Provide an affordable and wide range of year-round recreational opportunities to foster a healthy community for residents and visitors. Activities include: <ul style="list-style-type: none"> • downhill skiing & snowboarding • day & backcountry hiking • cross-country skiing • walking • back-country skiing & snowboarding • interpretive trails & signage • snowshoeing • climbing • sledding • touring • dog sledding • street & mountain biking • ice skating • camping • snowmobiling • fishing • sleigh rides • fall-color viewing • tennis • birding • swimming • health & fitness • soccer • off-highway vehicles • racquetball 	Consistent. The Project would include multi-use trails (bicycle, walking/running), golf course and golf club, skating rink, spa/wellness center, and Outfitters' Cabin. The Outfitters' Cabin would provide public parking and would serve as the hub of summer and winter activities including cross-country, mountain biking, hiking, and snowshoeing trails and fishing, hay rides and sleigh rides in the Inyo National Forest and Sherwin Mountains.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
<ul style="list-style-type: none"> • equestrian activities • snow play • BMX • Skateboarding 	
<p>P.4.C Ensure balance of use, enjoyment and separation where appropriate between motorized and non-motorized modes of recreation.</p>	<p>Consistent. The Project would include non-motorized recreation, including multi-use trails (bicycle, walking/running), and provide access to fishing, and cross-country, mountain biking, hiking, and snowshoeing in the Sherwin Range and Inyo National Forest lands. The Project would contribute to non-motorized modes of recreation in the Town.</p>
Connected Throughout	
<p>P.5.A Create open space corridors by combining open space on neighboring properties.</p>	<p>Consistent. The area north of the Store and Interpretive Center is not proposed for development and will remain as open space, and may be preserved in the form of a conservation easement. In addition, the Project proposes golf course uses that would connect with an adjacent golf course and would create an open space corridor.</p>
<p>P.5.B Design and construct trails as components of a regional and local network for recreation and commuting.</p>	<p>Consistent. The Project would include a bicycle and pedestrian system that would connect to existing on-site bikeways and to other Town bikeways to create safe continuous routes.</p>
<p>P.5.C Require development to incorporate linked public trail corridors identified in the Mammoth Lakes Trail System Plan into overall project site plan.</p>	<p>Consistent. See response to Policy P.5.B.</p>
<p>P.5.D Design public and private streets not only as connections to different neighborhood districts, but also as an essential element of the open space system. Include parks and plazas, tree-lined open spaces and continuous recreational paths in design.</p>	<p>Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The proposed roadway and pedestrian facility system would be reviewed by the Town to ensure that streets are an essential element of the open space system and include areas of tree-lined open spaces and a continuous recreational path.</p>
<p>P.5.E Design parks and open space to be accessible and usable except when set aside for preservation of natural resources, health and safety.</p>	<p>Consistent. The Project does not include any Town parks or dedicated open space areas. However, the Project is designed to enhance and complement recreational opportunities already available in the Town. Park-like and open space areas on the Project site would be accessible. The Project includes “stand alone” recreational amenities such as an golf course, a clubhouse and attendant facilities, an Outfitters’ Cabin, a Resident’s Club, a Hotel with ice skating, swimming, workout facilities, and a spa and wellness center.</p>
<p>P.5.F Ensure provision of parkland dedications or payment of in-lieu fees through project approvals or development impact fees.</p>	<p>Consistent. The Project’s proposed recreational and public amenities, in conjunction with the Town’s current facilities, and the collection of Developer Impact Fees would be adequate to accommodate the Project-created demand for recreational services.</p>

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
RESOURCE MANAGEMENT AND CONSERVATION	
Habitat Resources	
R.1.A Be stewards of important wildlife and biological habitats within the Town's municipal boundary.	Consistent. The Project would not impact rare, unique, or endangered species. The Project would be sited to cluster development and would not degrade habitat values. The Project would avoid Mammoth Creek and would not impact any riparian resources. As noted in Section IV.D. (Biology), the Project would not impact any deer migration corridors. Approximately 46 acres of potential foraging and resting habitat south of Old Mammoth Road and east of Fairway Drive that may be used by deer in the adjacent holding area would be lost. However, implementation of mitigation measures as described in Section IV.B would reduce this impact to less than significant.
R.1.B Development shall be stewards of Special Status plant and animal species and natural communities and habitats.	Consistent. See response to Policy R.1.A.
R.1.C Prior to development, projects shall identify and mitigate potential impacts to site-specific sensitive habitats, including special status plant, animal species, and mature trees.	Consistent. See response to Policy R.1.A.
R.1.D Be stewards of primary wildlife habitats through public and/or private management programs. For example, construction of active and passive recreation and development areas away from the habitat.	Consistent. See response to Policy R.1.A.
R.1.J Live safely with wildlife within our community.	Consistent. See response to Policy R.1.A.
R.2.A Trash enclosures, receptacles and food storage areas shall be animal resistant.	Consistent. The Project would incorporate animal resistant trash enclosures, receptacles and food storage areas.
R.2.B Be stewards of forested areas, wetlands, streams, significant slopes and rock outcroppings. Allow stands of trees to continue to penetrate the community to retain mountain character of Mammoth Lakes. Minimize tree removal for development to the greatest extent possible.	Consistent. Landscaping would incorporate some native trees and shrubs to revegetate disturbed areas, to preserve the resort-alpine character of the Town. Planting on the Project site would use native conifers, deciduous trees, and shrubs. Some Jeffrey pine and lodgepole pine are scattered throughout the basin sagebrush on the Project site. Some trees on the site may meet the minimum size (six inches in diameter) to require approval from the Town prior to removal. However, implementation of mitigation measures as described in Section IV.B would reduce this impact to less than significant.
R.2.C. Policy: Avoid wetland disturbance to greatest extent possible by requiring all feasible project modifications.	Consistent. See response to Policy R.1.A.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
R.3.A Prohibit development in the vicinity of Mammoth Creek that does not maintain minimum established setbacks and protect stream-bank vegetation.	Consistent. The Project would be sited and constructed to avoid Mammoth Creek and would not directly impact any wetland areas or riparian resources. The Store and Interpretive Center would be constructed on previously disturbed areas.
R.3.C Restore degraded areas within and adjacent to Mammoth Creek, in association with contiguous development projects or as off-site mitigation.	Consistent. The Project would be sited and constructed to avoid Mammoth Creek and would not directly impact any wetland areas or riparian resources. The Store and Interpretive Center would be constructed on previously disturbed areas. These areas would be restored and landscaped with native and compatible non-native species that are non-invasive.
R.3.D Improve public access to Mammoth Creek through discretionary project review and other available means.	Consistent. The Project does not include any public access to Mammoth Creek.; however, a conservation easement may be recorded which could allow future development of public access facilities.
Water Resources	
R.4.B Support and encourage water conservation and recycling practices within private and public developments.	Consistent. The Project may use recycled water for irrigation of the golf course if it becomes available.
R.4.C Require drought-tolerant landscaping and water-efficient irrigation practices for all development and Town-maintained landscaped areas, parks and park improvement projects. Development design, including parks, may include limited turf as appropriate to the intended use.	Consistent. Project landscaping will include drought resistant designs and planting and would conform to the Town's adopted water-efficient landscape regulations. Additionally Mammoth Community Water District policies regarding water conservation will be followed.
R.4.D Require development to use native and compatible non-native plants, especially drought-resistant species, to greatest extent possible when fulfilling landscaping requirements.	Consistent. See response to Policy R.4.C.
R.4.E Limit use of turf over root zones of native trees to avoid or minimize adverse impacts of excessive water to root zones of native trees.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project landscaping would be drought resistant and would conform to the Town's adopted water-efficient landscape regulations. Additionally Mammoth Community Water District policies regarding water conservation will be followed.
R.5.A Wisely manage natural and historic drainage patterns.	Consistent. The Project would require grading on the site, which would modify natural and historic drainage patterns. However, the Project would incorporate measures as described by the Lahontan Regional Water Quality Control Board during and after construction to manage runoff from the Project site.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
R.5.B Require parking lot storm drainage systems to include facilities to separate oils and silt from storm water where practical and when warranted by the size of the project.	Consistent. The Project will follow the Lahontan Regional Water Quality Control Board guidelines for drainage and water retention facilities.
R.5.C Prevent erosion, siltation, and flooding by requiring use of Best Management Practices (BMPs) during and after construction.	Consistent. The proposed Project will follow the Lahontan Regional Water Quality Control Board BMPs and guidelines during and after construction.
Energy Resources	
R.6.A Reduce energy demand by promoting energy efficiency in all sectors of the community.	Consistent. The Project would incorporate energy conserving materials, systems, and appliances including using recycled water for irrigation of the Golf Course, planting native, drought tolerate landscaping, incorporating energy efficient appliances in the buildings, and conforming to Town ordinances for recycling..
R.6.C Encourage energy efficiency in new building and retrofit construction, as well as resource conservation and use of recycled materials.	Consistent. See response to Policy R.6.A.
R.7.A Use green building practices to greatest extent possible in all construction projects.	Consistent. See response to Policy R.6.A.
R.7.B Encourage development of housing close to work, commercial services, recreation areas and transit routes to reduce fuel consumption.	Consistent. The Project would include mixed-uses including residential uses adjacent to commercial services and recreation areas. The Project would include provisions for transit and shuttle service.
R.9.A Support programs to recycle materials such as paper, cardboard, glass, metal, plastics, motor oil; and programs to compost or chip for mulch tree cuttings, brush, and other vegetation.	Consistent. As discussed in Section IV.N (Utilities), the Project will incorporate the Town's recycling program, thereby diverting solid waste from the landfill.
Air Quality	
R.10.A Support regional air quality improvement efforts.	Consistent. As discussed in Sections IV. C (Air Quality) and IV.M (Transportation), the proposed Project would include mixed uses, which would include some retail facilities near residential uses. The Project would be located near public transportation stops and would include a shuttle, as well as a trail system to encourage the use of alternative modes of transportation. All these measures would encourage shopping locally and using alternative modes of transportation to access commercial and retail needs, which would result in a reduction of vehicle trips that would support the implementation of regional air quality goals.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
R.10.B Promote land use patterns that reduce number and length of motor vehicle trips, including: <ul style="list-style-type: none"> • development of in-Town workforce housing • residential and mixed use development adjacent to commercial centers • mountain portals and transit corridors • provision of a mix of support services in employment areas 	Consistent. See response to Policy R.10.A.
R.10.C Support strategies for development that reduce projected total vehicle miles traveled including, but are not limited to: <ul style="list-style-type: none"> • circulation system improvements • mass transit facilities • private shuttles • design and location of facilities to encourage pedestrian circulation 	Consistent. See response to Policy R.10.A.
R.10.D Mitigate impacts on air quality resulting from development through design, participation in Town air pollution reduction programs, and/or other measures that assure compliance with adopted air quality standards.	Consistent. See response to Policy R.10.A.
R.10.E Reduce air pollutants during construction through implementation of Best Management Practices (BMPs).	Consistent. The Project would incorporate BMPs during construction to reduce air pollutant emissions.
R.10.F Develop an efficient transportation system to reduce CO ₂ emissions and air pollutants.	Consistent. See response to Policy R.10.A.
R.10.H No solid fuel burning appliances will be installed within any multi-unit development.	Consistent. The Project would not include any solid fuel-burning appliances in multi-unit development.
PUBLIC HEALTH AND SAFETY	
Public Safety	
S.2.A Maintain safe and efficient municipal operations and services.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project would not significantly impact operations and services of the Town of Mammoth Lakes Police Department, Mammoth Lakes Fire Protection District, Mammoth Unified School District, parks and recreation areas, Town of Mammoth Lakes Public Works, and Mammoth Community Water District (wastewater treatment).
Police Enforcement	
S.2.B Ensure effective code enforcement and policing programs.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Town of Mammoth Lakes Police Department would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
S.2.D Increase public access to police services.	Consistent. See response to Policy S.2.B.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Snow Management	
S.3.A. Policy: Design all structures in Mammoth Lakes to withstand snow loads and to reduce any additional hazards created by snow accumulation.	Consistent. The Project would be designed to current Town Municipal Code to withstand snow loads. The Project would incorporate snow management devices and roof drainage systems in the roof and building design, so that snow will not be permitted to shed freely into active pedestrian or vehicular areas.
S.3.B Design buildings so that snow shed, ice shed and snowmelt are not a hazard to people and property.	Consistent. See response to Policy S.3.A.
S.3.C All developments shall provide and maintain adequate on-site snow storage or maintain a Town-approved snow-hauling program.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for snow management including areas adjacent to driveways and parking areas, ground level snow storage, and landscape snow shed areas. Ground and roof level snow storage areas would be identified. Landscape snow shed areas would be designated and located adjacent to the base of buildings and would be sized to accommodate the anticipated volumes of snow. Roof forms would be designed in coordination with pedestrian areas at the base of buildings. Snow falling from roofs would be directed to landscaped areas at the base for the buildings or to lower level flat roofs. The management of snow at the Project site would be the sole responsibility of the Snowcreek property owners or their designated representative association.
S.3.D Maintain safe public access and circulation through comprehensive snow removal programs provided by the Town or by private entities.	Consistent. See response to Policy S.3.C.
Geologic and Seismic	
S.3.H Restrict development in areas with steep slopes.	Consistent. The Project would not be located on areas of steep slopes.
S.3.I Require geotechnical evaluations and implement mitigation measures prior to development in areas of potential geologic or seismic hazards.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Project would be designed in conformance with the recommendations contained in the Geotechnical Report and to current CBC requirements, which will reduce the potential for structures on the Project site to sustain damage during an earthquake event.
Flood	
S.3.K Restrict development in flood areas and near perimeter of natural water bodies.	Consistent. The Project would be setback from and would avoid Mammoth Creek. No other portions of the site are located within a flood zone.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
Fire	
S.3.L All construction shall comply with wildland fire-safe standards, including standards established for emergency access, signing and building numbering, private water supply reserves available for fire use, and vegetation modification.	Consistent. The Project is located adjacent to open space areas to the east and south that could be subject to wildfires. The Project design has been reviewed by the Mammoth Lakes Fire Protection District and would conform to design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan.
S.3.M Involve local fire department in the development review process.	Consistent. See response to Policy S.3.L.
S.3.N Minimize the incidence of fires by supporting the Mammoth Lakes Fire Protection District's ("MLFPD") ability to respond to emergencies.	Consistent. As described in Section IV.K (Public Services) of the Draft EIR, the Project would not require the need for new staff or new or altered fire protection facilities.
S.3.O Support provision of adequate water flow throughout the town and provision of adequate water storage to meet peak fire demand during times of peak domestic demands.	Consistent. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. The Town would review the Project for conformance with the design and fire suppression standards and requirements as provided in the Mammoth Lakes Fire Protection District Plan.
Hazardous Materials	
S.3.R Provide for safe use and disposal of hazardous materials.	Consistent. Project uses include residential and resort uses. A small amount of everyday chemicals would be used including solvents and cleaners. These materials would be disposed of in compliance with all hazardous waste regulations.
S.3.S Require a Hazardous Materials Disclosure form from all development.	Consistent. The Project developer would be required to submit a Hazards Materials disclosure form during both construction and operation of the Project.
Emergency Preparedness	
S.4.A Aid emergency vehicle access and emergency evacuation of residents and visitors by providing and maintaining secondary access routes to all portions of the community, consistent with the Mammoth Lakes Fire Protection District ("MLFPD") requirements.	Consistent. The Project would include a secondary access point at Old Mammoth Road across from Snowcreek VII. The Project is subject to design review by the Town Community Development Department, other departments and divisions, and outside agencies. All roadway designs would be reviewed by the Town for adequate roadway standards and emergency vehicle access. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project would conform to design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan.
S.4.B Maintain an Emergency Plan.	Consistent. The Project would include the preparation of emergency plans.

**Table IV.H-3
Comparison of Project Characteristics to Applicable Policies in the 2007 General Plan**

Policy	Consistency Discussion
S.4.C Cooperate with emergency response agencies to maintain preparedness to respond to all types of emergencies.	Consistent. The Project design has been reviewed by the Mammoth Lakes Fire Protection District and would conform with design and fire suppression standards and requirements in the Mammoth Lakes Fire Protection District Plan. Additionally, the Town of Mammoth Lakes Police Department has been contacted to verify that it would have sufficient resources to adequately satisfy the Project's demand for police protection service in addition to the existing demand for such service in the community.
Education	
S.5.A Encourage development and enhancement of school sites and other administrative, educational, and recreational facilities.	Consistent. As discussed in Section IV.K (Public Services) of this Draft EIR, the Project applicant is required to pay school developer fees levied by the Town pursuant to Section 17620 of the California Education Code.
S.5.B Support expansion of educational opportunities within the community.	Consistent. See Response to Policy A.2.D and P.2.D.

The Project includes a 1987 General Plan Amendment to remove the Sherwin Ski Bowl from the area and include the expansion of the Golf Course. The Project also includes revisions to the Zoning Ordinance to allow the height of the Hotel and transfer of unused density within the master plan area. If the 1987 General Plan Amendment and Zoning Ordinance revisions are approved, the Project would be generally consistent with the applicable policies in the 1987 General Plan, the 2007 General Plan, and Town Zoning Ordinance by including features that are consistent with the General Plan(s). Areas where the Project would not be consistent include impacts to public views, changes to the amount of light and glare coming from the Project site and the identification and acquisition of points of public access to public lands from within the Urban Growth Boundary. The Project would only be generally consistent with General Plan policies related to transit-oriented development, since it would not include sufficient amounts of retail uses within walking distance to the Project to discourage the use of vehicles. Due to consistency with virtually all of the 1987 and 2007 General Plan policies in the above tables, impacts of the Project would be *less than significant* and would not require mitigation.

CUMULATIVE IMPACTS

Impact LU-2

Cumulative land use impacts could occur if other related projects in the Town of Mammoth Lakes would result in land use impacts in conjunction with the Project. Of the 41 related projects, 34 are residential projects located within the Town. The Project, in conjunction with other projects, is located within an urbanized area and would not be great enough in size or extent to divide an established community. The

Project site and its vicinity are not located within an area covered by a Habitat Conservation Plan or Natural Community Conservation Plan and, therefore, would not contribute to any cumulative impacts to Habitat Conservation Plans.

The Project is consistent with lot coverage as defined by the General Plan. Additionally, once the Zoning Code revisions are approved, the height of the proposed Hotel component of the Project would be consistent with height limitations as allowed in the Zoning Code. Each of these related projects would be required to demonstrate consistency with the goals, policies, and objectives of the General Plan, and other applicable regional plans and to determine whether they would result in environmental impacts. Therefore, the Project would not contribute to any cumulative land use impacts and this impact would be *less than significant*.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project's land use impacts would be *less than significant*.

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