

# MONO COUNTY PLANNING COMMISSION

---

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

## SPECIAL MEETING AGENDA

June 16, 2022 – 9:00 a.m.

This meeting will be held via teleconferencing with members of the Commission attending from separate remote locations. As authorized by AB 361, dated September 16, 2021, a local agency may use teleconferencing without complying with the teleconferencing requirements imposed by the Ralph M. Brown Act when a legislative body of a local agency holds a meeting during a declared state of emergency and local officials have recommended or imposed measures to promote social distancing or the body cannot meet safely in person and the legislative body has made such findings.

Members of the public may participate via the Zoom Webinar, including listening to the meeting and providing public comment, by following the instructions below. If you are unable to join the Zoom Webinar of the Commission meeting, you may still view the live stream of the meeting by visiting

### 1. Joining via Zoom

There is no physical location of the meeting open to the public. You may participate in the Zoom Webinar, including listening to the meeting and providing public comment, by following the instructions below.

#### To join the meeting by computer

Visit: <https://monocounty.zoom.us/j/88293941545>

Or visit <https://www.zoom.us/> and click on “Join A Meeting.” **Use Zoom Meeting ID: 882 9394 1545**  
To provide public comment (at appropriate times) during the meeting, press the “Raise Hand” hand button on your screen and wait to be acknowledged by the Chair or staff.

#### To join the meeting by telephone

Dial (669) 900-6833, then enter **Webinar ID: 882 9394 1545**

To provide public comment (at appropriate times) during the meeting, press \*9 to raise your hand and wait to be acknowledged by the Chair or staff.

### 2. Viewing the Live Stream

You may also view the live stream of the meeting without the ability to comment **by visiting:**

[http://monocounty.granicus.com/MediaPlayer.php?publish\\_id=318d79a9-c93e-4b5c-96af-892f88bbca73](http://monocounty.granicus.com/MediaPlayer.php?publish_id=318d79a9-c93e-4b5c-96af-892f88bbca73)

*\*Agenda sequence (see note following agenda).*

#### 1. CALL TO ORDER & PLEDGE OF ALLEGIANCE

2. **PUBLIC COMMENT:** Opportunity to address the Planning Commission on items not on the agenda

#### 3. MEETING MINUTES

A. Review and adopt minutes of May 19, 2022 (pg. 1)

#### 4. ADOPT RESOLUTION AB 361 TO CONTINUE DIGITAL MEETINGS (pg. 3)

---

DISTRICT #1  
COMMISSIONER  
Patricia Robertson

DISTRICT #2  
COMMISSIONER  
Roberta Lagomarsini

DISTRICT #3  
COMMISSIONER  
Jora Fogg

DISTRICT #4  
COMMISSIONER  
Scott Bush

DISTRICT #5  
COMMISSIONER  
Chris I. Lizza

**5. PUBLIC HEARING**

- A. **9:00 a.m. Conditional Use Permit 22-004/Valletta.** Transient rental of two units in a four-unit complex located at 34 Foster Avenue, June Lake. The property is designated Mixed-Use and is 0.23 acres. Occupancy is limited to six persons maximum per unit and two vehicles per unit. No new development is proposed. Staff: Michael Draper (pg. 6)
  
- B. **9:30 a.m. Resource Efficiency Plan Update and Vehicle Miles Traveled (VMT) Thresholds of Significance.** Adopt the updated Resource Efficiency Plan and the associate Addendum, and recommend adoption of the presented VMT thresholds of significance and screening criteria and associated Addendum to the Board of Supervisors. Staff: Bentley Regehr. (pg. 25)

**6. WORKSHOP - none**

**7. REPORTS**

- A. Director (pg.94)
- B. Commissioners

**8. INFORMATIONAL**

- A. **June Lake Active Transportation Plan community engagement schedule** (pg. 96)

**9. ADJOURN** to July 21, 2022

**NOTE:** Although the Planning Commission generally strives to follow the agenda sequence, it reserves the right to take any agenda item – other than a noticed public hearing – in any order, and at any time after its meeting starts. The Planning Commission encourages public attendance and participation.

In compliance with the Americans with Disabilities Act, anyone who needs special assistance to attend this meeting can contact the Commission secretary at 760-924-1804 within 48 hours prior to the meeting to ensure accessibility (see 42 USCS 12132, 28CFR 35.130).

\*The public may participate in the meeting at the teleconference site, where attendees may address the Commission directly. Please be advised that Mono County does its best to ensure the reliability of videoconferencing but cannot guarantee that the system always works. If an agenda item is important to you, you might consider attending the meeting in Bridgeport.

Full agenda packets, plus associated materials distributed less than 72 hours prior to the meeting, will be available for public review at the Community Development offices in Bridgeport (Annex 1, 74 N. School St.) or Mammoth Lakes (Minaret Village Mall, above Giovanni’s restaurant). Agenda packets are also posted online at [www.monocounty.ca.gov / departments / community development / commissions & committees / planning commission](http://www.monocounty.ca.gov/departments/community%20development/commissions%20&%20committees/planning%20commission). For inclusion on the e-mail distribution list, send request to [bperatt@mono.ca.gov](mailto:bperatt@mono.ca.gov).

Commissioners may participate from a teleconference location. Interested persons may appear before the Commission to present testimony for public hearings, or prior to or at the hearing file written correspondence with the Commission secretary. Future court challenges to these items may be limited to those issues raised at the public hearing or provided in writing to the Mono County Planning Commission prior to or at the public hearing. Project proponents, agents or citizens who wish to speak are asked to be acknowledged by the Chair, print their names on the sign-in sheet, and address the Commission from the podium.

# MONO COUNTY PLANNING COMMISSION

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

## Draft Minutes

May 19, 2022 – 9:05 a.m.

**COMMISSIONER:** Chris Lizza, Roberta Lagomarsini, Scott Bush, Patricia Robertson

**STAFF:** Wendy Sugimura, director; Heidi Willson, planning commission clerk; Bentley Regehr, planning analyst; April Sall, planning analyst, Erik Ramakrishnan, Counsel

**PUBLIC:** No Public

1. **CALL TO ORDER & PLEDGE OF ALLEGIANCE-** Meeting called to order at 9:04 am and the Commissioners lead the pledge of allegiance.
2. **PUBLIC COMMENT:** Opportunity to address the Planning Commission on items not on the agenda.
  - No public comment.
3. **MEETING MINUTES**
  - A. Review and adopt minutes of the AB361 meeting held on April 21, 2022.
  - B. Review and adopt minutes of April 21, 2022.

**Motion:** Approve the minutes from AB361 meeting and April 21, 2022 meeting.

**Bush motion; Lizza second.**

**Roll-call vote – Ayes: Lizza, Bush, Lagomarsini, Robertson.**

**Motion passed 4-0.**

4. **ADOPT RESOLUTION AB 361 TO CONTINUE DIGITAL MEETINGS**

**Motion:** Adopt resolution AB 361.

**Lagomarsini motion; Bush second.**

**Roll-call vote – Ayes: Lizza, Bush, Lagomarsini, Robertson.**

**Motion passed 4-0.**

5. **PUBLIC HEARING**

- A. **9:00 a.m. USE PERMIT 22-003/Nichols.** Proposal to create a transient rental at the existing residence located at 14 Hays Street in Bridgeport (APN 008-141-007). The maximum occupancy for the rental is four persons and one vehicle. Property is designated Commercial (C). *Staff: April Sall*
  - Sall gave a presentation and answered questions from the Commission.
  - Robertson asked if the Use Permit runs with the land?

DISTRICT #1  
COMMISSIONER  
Patricia Robertson

DISTRICT #2  
COMMISSIONER  
Roberta Lagomarsini

DISTRICT #3  
COMMISSIONER  
Jora Fogg

DISTRICT #4  
COMMISSIONER  
Scott Bush

DISTRICT #5  
COMMISSIONER  
Chris I. Lizza

- Sall answered that yes, the use permit goes with the land, but the Vacation rental permit would have to be renewed if the land were to be sold.
- Applicant was unable to attend however did agree to still have the meeting held despite only having 4 Commissioners.

Public Hearing Open at 9:36am.

Public Hearing Closed at 9:39am.

- Lizza believes that there are places that nightly rental is appropriate, and this is a good example of that.
- Robertson does not believe she can make all the findings including the components in the general plan. Very concern about resident housing in the Bridgeport area.
- Lizza states that the location of this property is not a desirable long-term housing due to the noise from the highway and restaurant next door.
- Lagomarsini stated that she can see both side and is torn on her decision.
- Bush stated that the land use designation is commercial which designed for a situation like this with a nightly rental.

**Motion:** Find that the project qualifies as a Categorical Exemption under CEQA guidelines 15301 and instruct staff to file a Notice of Exemptions. Finding that the project meets the required findings and approve Use Permit 22-003 subject to conditions of approval.

**Bush motion; Lagomarsini second.**

**Roll-call vote – Ayes: Lizza, Bush, Lagomarsini. Nay Robertson.**

**Motion passed 3-1.**

## 6. WORKSHOP

- A. **9:30 a.m. Mono County Resource Efficiency Plan (REP) / Greenhouse Gas Emissions Reduction Plan Update.** A presentation and review of a draft of the updated REP. *Staff: Bentley Regehr*
- Update on the Resource Efficiency Plan was presented.
  - No public comment.

## 7. REPORTS

- A. Director
- Wendy provided a director report in packet.
- B. Commissioners
- Commissioner Lizza and Robertson gave a report.

## 8. INFORMATIONAL

- A. June Lake Active Transportation Plan community workshop schedule.

## 9. ADJOURN at 10:18 am to June 16, 2022.

# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 16, 2022

**TO:** Mono County Planning Commission

**FROM:** Wendy Sugimura, Director

**SUBJECT:** Assembly Bill 361 Virtual Meetings

## **RECOMMENDATION**

Adopt Resolution R22-06 to continue meeting under modified teleconferencing rules.

## **BACKGROUND**

On March 4, 2020, Governor Newsom issued a Proclamation of State of Emergency in response to the COVID-19 pandemic. That Proclamation remains in effect. Subsequently, on March 17, 2020, Governor Newsom issued Executive Order N-29-20, which modified the teleconferencing rules set forth in the California Open Meeting law, Government Code section 54950 et seq. (the “Brown Act”), in order to allow legislative bodies to meet from remote locations without opening those locations to the public or complying with certain agenda requirements. Those modifications remained in effect through September 30, 2021.

## **DISCUSSION**

In anticipation of the expiration of the applicable provisions of Executive Order N-29-20, the California legislature adopted, and Governor Newsom signed, AB 361. AB 361 amended the Brown Act to allow local legislative bodies to continue to meet under the modified teleconferencing rules until January 1, 2024, if the meeting occurs during a proclaimed state of emergency and the legislative body finds that it has reconsidered the circumstances of the state of emergency and either:

- measures to promote social distancing have been imposed or recommended by local health officials; or
- the state of emergency continues to directly impact the ability of the members to meet safely in person.

The Local Health Officer and the Director of Mono County Public Health have recommended that measures be implemented to promote social distancing, including the holding of virtual meetings. A copy of the memo memorializing that recommendation is attached to the draft proposed resolution (Attachment 1).

In order to continue meeting virtually under those modified rules after July 16, the Commission will again need to reconsider the circumstances of the state of emergency and again make one of the additional findings required by AB 361.

## **Attachment**

1. AB 361 Resolution with Public Health recommendation



**RESOLUTION 22-06**  
**A RESOLUTION OF THE MONO COUNTY PLANNING COMMISSION**  
**AUTHORIZING REMOTE TELECONFERENCE MEETINGS**  
**FOR THE PERIOD OF JUNE 16, 2022, THROUGH JULY 16, 2022, PURSUANT TO AB**  
**361**

**WHEREAS**, on March 4, 2020, Governor Newsom issued a Proclamation of State of Emergency in response to the COVID-19 pandemic, which Proclamation remains in effect; and

**WHEREAS**, on March 17, 2020, Governor Newsom issued Executive Order N-29-20, modifying the teleconferencing rules set forth in the California Open Meeting law, Government Code section 54950 et seq. (the "Brown Act"), subject to compliance with certain requirements; and

**WHEREAS**, on June 11, 2021, Governor Newsom issued Executive Order N-08-21, providing that the modifications would remain in place through September 30, 2021; and

**WHEREAS**, on September 16, 2021, Governor Newsom signed AB 361, providing that a legislative body subject to the Brown Act may continue to meet under modified teleconferencing rules if the meeting occurs during a proclaimed state of emergency and state or local officials have imposed or recommended measures to promote social distancing; and

**WHEREAS**, the Local Health Officer and the Director of Mono County Public Health have recommended that measures be implemented to promote social distancing, including the holding of virtual meetings of legislative bodies within the County of Mono, a copy of that recommendation is attached as an exhibit and incorporated herein; and

**WHEREAS**, in the interest of public health and safety, and in response to the local recommendation for measures to promote social distancing, the Mono County Planning Commission (the "Legislative Body") deems it necessary to invoke the provisions of AB 361 related to teleconferencing.

**NOW, THEREFORE, THE LEGISLATIVE BODY FINDS AND RESOLVES** that:

**SECTION ONE:** The recitals set forth above are true and correct and are adopted as findings of the Legislative Body.

**SECTION TWO:** The Legislative Body has reconsidered the circumstances of the State of Emergency.

**SECTION THREE:** State or local officials have recommended measures to promote social distancing, including the holding of virtual meetings for legislative bodies within the County of Mono that are subject to the Brown Act.

1           **SECTION FOUR:** Staff is directed to return to the Legislative Body no later than thirty  
2 (30) days after the adoption of this resolution, or at the next meeting of the Legislative Body, if  
3 later, for the Legislative Body to consider whether to again make the findings required to meet  
4 under the modified teleconference procedures of AB 361.

4           **PASSED, APPROVED and ADOPTED** this 16th day of June 2022, by the following  
5 vote, to wit:

6 **AYES:**

7 **NOES:**

8 **ABSENT:**

9 **ABSTAIN:**

\_\_\_\_\_  
Patricia Robertson, Chair

12 **ATTEST:**

**APPROVED AS TO FORM:**

\_\_\_\_\_  
Heidi Willson  
Secretary of the Planning Commission

# Mono County Community Development

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

## Planning Division

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 16, 2022

To: Mono County Planning Commission

From: Michael Draper, Planning Analyst

Re: Conditional Use Permit 22-004/Valletta

### RECOMMENDATION

It is recommended the Planning Commission take the following actions:

1. Hold the public hearing, receive public testimony, deliberate the project, and make any desired changes;
2. Find the project qualifies as a Categorical Exemption under CEQA guidelines 15301 and instruct staff to file a Notice of Exemption;
3. Make the required findings as contained in the project staff report and approve Use Permit 22-004/Valletta subject to Conditions of Approval;

OR

1B. Find that the project does not meet the required findings as contained in the project staff report and deny Use Permit 22-004.

### BACKGROUND

Under Mono County General Plan Land Use Element Chapter 26, transient rental use may be permitted for any parcel having a non-residential land use designation, subject to a Director Review Permit, or Multi-Family Residential- High (MFR-H) designation, subject to a use permit, and provided the project is non-controversial.

At the March 1, 2022, Board of Supervisors meeting, Community Development staff conducted a workshop for a potential moratorium on short-term rentals. The Board indicated support for a moratorium and directed staff to return with varying options. The Board did not provide direction on acceptance and processing of new applications, and therefore typical procedures were followed.

The project's application was accepted for processing at the March 7, 2022, Land Development Technical Advisory Committee (LDTAC) meeting. After acceptance, it was determined that the project would be elevated to a Conditional Use Permit per General Plan Land Use Element §31.010 because a potential moratorium on the use indicated controversy, and the applicant was informed of the decision. The applicant directed staff to wait to process the permit until the Board made a final decision on the moratorium.

On May 3, the Board approved an emergency moratorium on all overnight rentals conducted in a single-family residence regardless of the land use designation. However, the Board directed staff



to process projects that were already deemed complete and accepted, and to elevate the applications to a use permit. This project is located within a fourplex on a property designated Mixed Use (MU) and was accepted for processing prior to the moratorium.

## PROJECT DESCRIPTION

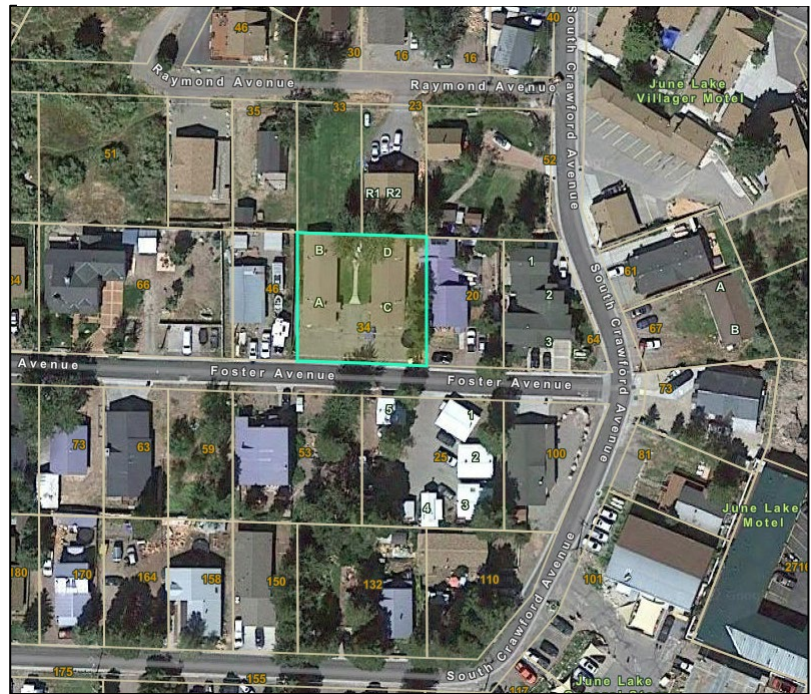
The proposed project would allow transient rental (fewer than 30 consecutive days) of two, two-bedroom units in a fourplex at 34 Foster Avenue (APN 015-111-032-000) in the Village area of June Lake. Maximum occupancy for each unit is six persons, and two parking spaces will be provided for each unit. Each unit is approximately 768 square-feet (sf). The remaining two units will continue to be used for long-term rentals. Two units are proposed for transient rental and are currently unoccupied because the previous long-term tenants chose not to renew their lease.

Figure 1. Project location: 34 Foster Ave.

The property is 0.21-acres, and the units were constructed in 1979/80 as two separate duplexes on two separate parcels. In March 1992, the Mono County Planning Commission approved Conditional Use Permit #34-91-17 to convert all units to transient rentals, with an added condition to merge the parcels. Since then, transient use discontinued, and all units were converted to long-term rental. The current owner is requesting to allow two of the four units for transient rental (rental less than 30-days).

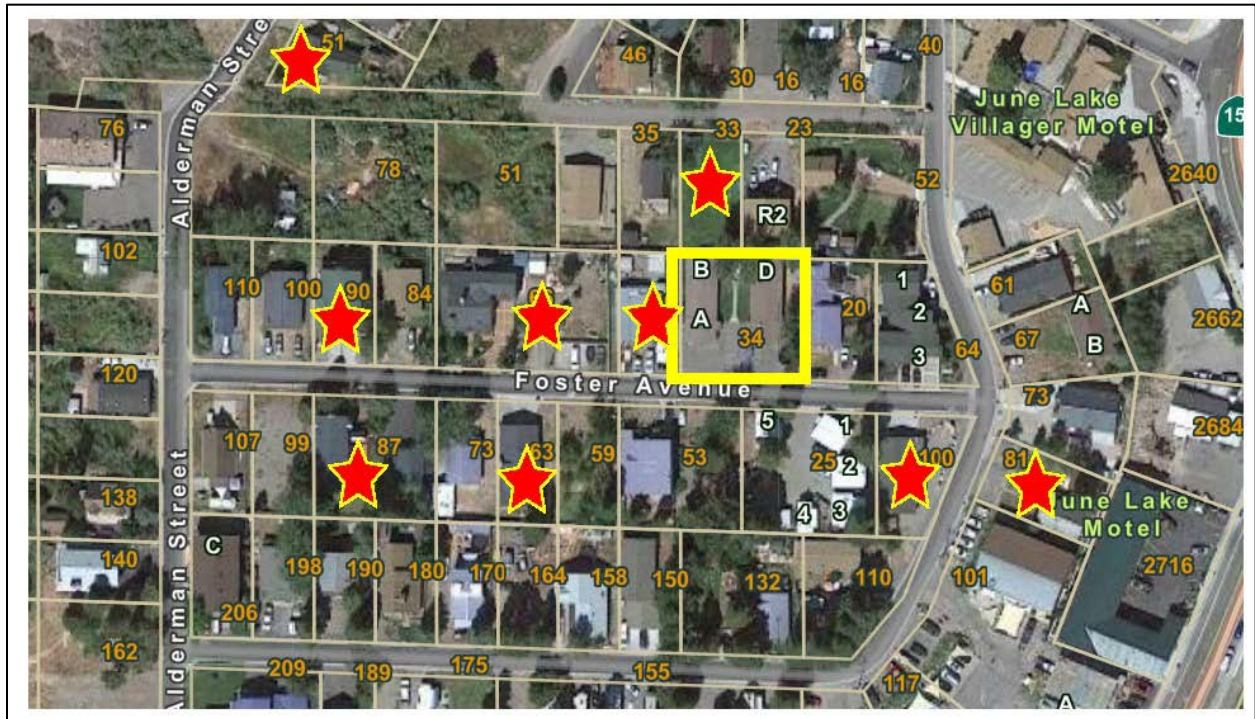
## PROJECT SETTING

The project is located on an MU parcel at 34 Foster Avenue in June Lake (APN 015-111-032). Foster Avenue is a paved road maintained by the County and is within the Class III categorization for snow removal priority.



All properties surrounding the project are designated MU and developed with residential units. Along Foster Avenue six properties have approvals to conduct transient rental, in addition to three properties within the vicinity (see the image below: 46 Foster Avenue (DR21-011), 33 Raymond (DR21-012), 81 South Crawford (DR21-013), 66 Foster Avenue (DR17-014), 46 Raymond (DR17-021), 63 Foster Avenue (DR16-002), 100 South Crawford (DR16-003), 87 Forster Avenue (DR16-087), and 90 Foster Avenue (DR15-013).

Figure 2. Transient rentals within the vicinity



## GENERAL PLAN CONSISTENCY

### I. Land Use Designation Standards

The General Plan Land Use Designation for this property is Mixed Use (MU). Per the Mono County General Plan, “the ‘MU’ district is intended to provide for a wide range of compatible resident- and visitor-oriented residential and commercial uses, including business, professional, and retail uses; to provide for efficient use of land and increased opportunities for affordable housing; to provide a transition between intensive commercial uses and residential uses; and to be applied to areas with existing mixed-use development.

MU transitional areas can limit the size of business establishments and restrict uses incompatible with residential district. Not all areas need contain residential uses. Commercial uses shall conform to strict standards that prohibit obnoxious odors, obtrusive light and glare, and excessive noise.

Permitted uses subject to a Director Review permit include transient rental (fewer than 30 consecutive days) in compliance with Chapter 26 and a business license. As previously noted, at the May 3, 2022, Board of Supervisors meeting, direction was given to elevate all current transient and short-term rental applications to a Use Permit.

### II. Land Use Development Standards

Current development standards for the MU designation include maximum lot coverage of 60%, and minimum setbacks of 10’ in the front and 5’ on the rear and 10’ for side-yards. Minimum lot dimensions are a width of 60’ and depth of 100’.

This property is 10,018 sf (0.23 acres) therefore lot coverage may not exceed 6,010 sf; current lot coverage is 7,144' sf or 71%; therefore, the property is existing nonconforming to current lot coverage standards.

The two multi-family structures meet required setback distances, however a shed along the east property boundary does not meet setbacks and is existing nonconforming to the side-yard setback distance required.

Figure 3. Lot coverage

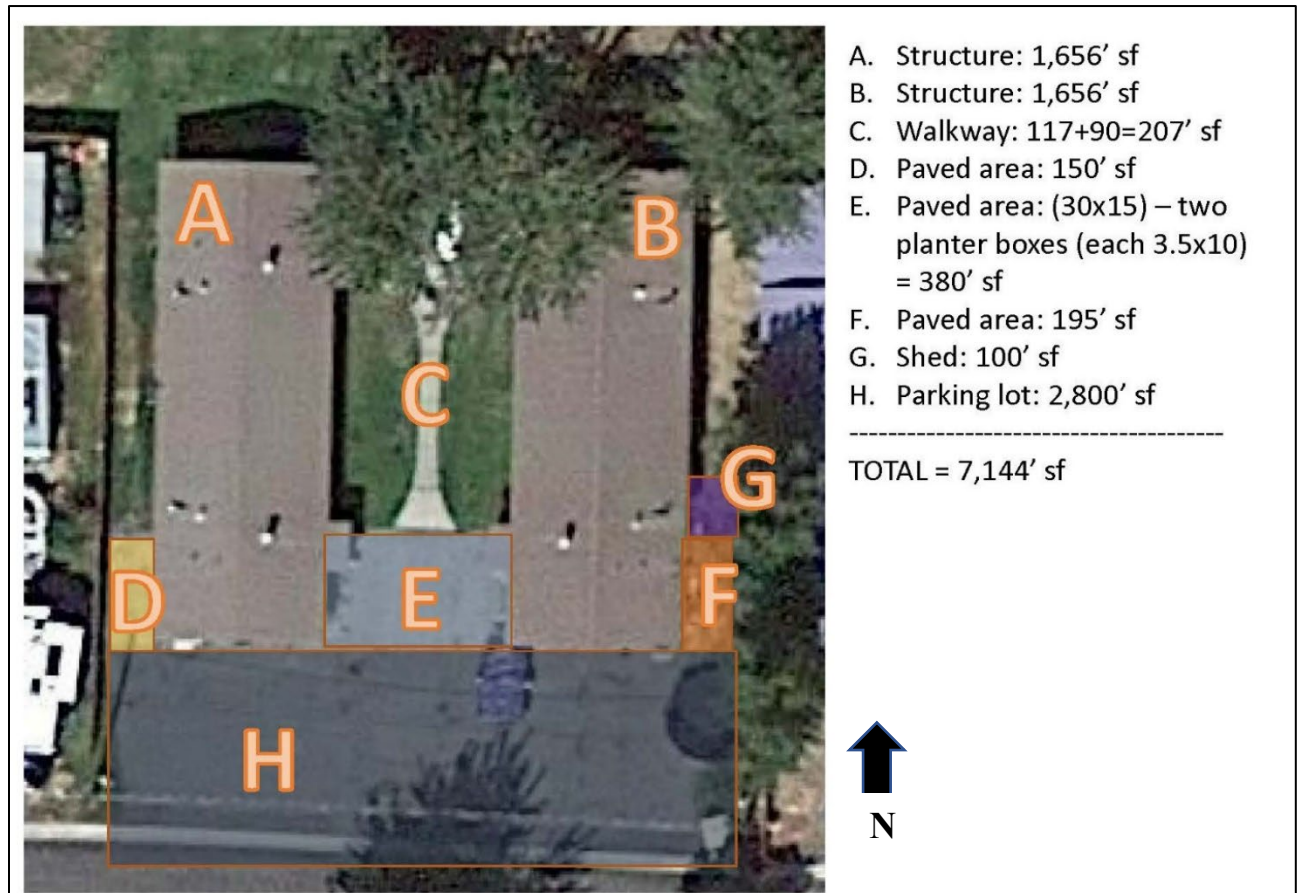


Figure 4. Nonconforming shed.



### Parking

A multi-family dwelling is required to provide a minimum of two parking spaces per unit, plus no fewer than two guest parking spaces. Uncovered parking spaces in June Lake must be a minimum of 10' x 20'. As a four-unit complex, the property is required to provide a minimum of 10 parking spaces. Two units of the four-plex shall remain long-term rental, therefore six spaces shall remain available to the long-term units.

For a transient rental use, units are required to provide the minimum parking requirement set forth in the General Plan, and the number of vehicles shall not exceed the number of parking spaces.

The site plan provided by the applicant shows nine, 11' x 20', uncovered, paved parking spaces. The parking area is 100' x 28' and can accommodate 10, 10' x 20' uncovered parking spaces to meet the requirement of the General Plan. The parking area does not have parking space markings/stripping, and spaces are not designated for each unit. Six spaces must be available to long-term rents, therefore the transient rental is limited to four parking spaces.

Figure 5. Parking area.



### Snow Storage

A snow-storage area is required for all multifamily developments (three or more units). The area may be landscaped, paved or covered with natural vegetation. Snow-storage areas shall be equal to a required percentage of the area from which the snow is to be removed (i.e., parking and access/roads areas). Snow storage shall also be provided on site. For June Lake, the snow-storage area shall be 65% of area from which the snow is removed.

The parking area, paved entry way area, and paved walkways require snow removal. The cumulative area is equal to 3,387' sf, therefore a snow-storage area of 2,201' sf is required.

An 80' x 10' snow-storage area exists along the west side of the property (800' sf). Two lawns, 13.5' x 39' each, provide additional snow-storage areas (1,053' sf). Another area measuring 23' x 13' provides snow-storage on the east side of the property (299' sf), however an existing shed blocks additional snow-storage area identified by the applicant. The total snow-storage areas equal 2,152' sf, which is 49' sf less than the requirement. The property is existing nonconforming to snow-storage standards; however, more snow-storage would be accessible if the shed within the setback is moved. The applicant will contract for snow-removal services during winter months.

Figure 6. Snow storage areas.

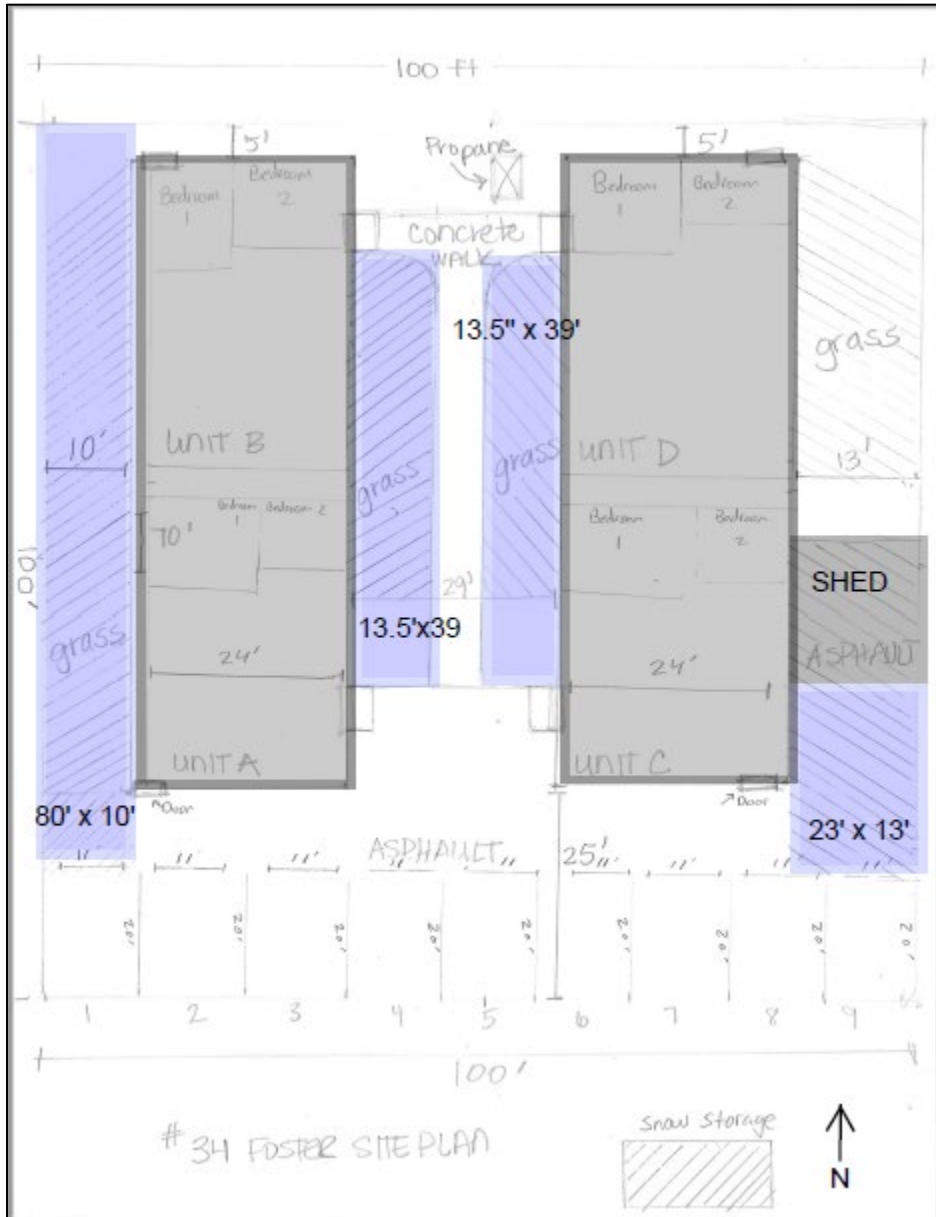


Figure 7. West snow-storage area



Figure 8. Walkway area



Figure 9. East snow-storage area





Figure 10. East inaccessible snow-storage area.



#### **LAND DEVELOPMENT TECHNICAL ADVISORY COMMITTEE (LDTAC)**

The LDTAC reviewed and approved the application for processing on March 7, 2022. The draft conditions of approval for this project were reviewed and approved by LDTAC June 6, 2022.

#### **PUBLIC HEARING NOTICE**

A notice was published in the June 4, 2022, edition of The Sheet. Notices were also mailed to all property owners within 300' of the project site.

#### **COMMENTS RECEIVED**

One comment letter was received on the project (Attachment 1) at the time this staff report was drafted. The letter did not oppose or support the project, but rather indicated the residential units encroach onto an adjacent property at the rear yard. Therefore, the rear-yard setback may also be

existing nonconforming, but a survey of the subject property would need to be completed. A condition requiring the survey, submittal of an adjusted site plan if necessary, and resolution with the neighbor on any encroachment prior to application for a Vacation Home Rental permit under Mono County General Plan Land Use Element Chapter 26 has been added to address this issue.

A verbal update will be provided on any public comments received after the drafting of this staff report. Reasonable opposition by neighbors who may be directly affected may be considered by the Planning Commission as grounds for denial, as stated below in Land Use Element, Action 1M.3.c.

### **CEQA COMPLIANCE**

The project is consistent with a Class 1 California Environmental Quality Act (CEQA) exemption. Class 1 (15301) consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

Examples include but are not limited to:

- Conversion of a single-family residence to office use.

Residential units that are rented on a transient basis will still be used in a manner that is not substantially different from how they would be used if they were occupied by full-time residents or long-term renters. In addition, transient rentals are subject to compliance with regulations governing the management of these units stipulated in Mono County General Plan Chapter 26, which addresses aesthetics, noise, parking, utilities, and other similar issues. As a result, rental of a residential unit is not an expansion of use, and is no more intensive or impactful than, for example, conversion of a single-family residence to office use.

### **USE PERMIT FINDINGS**

The following provides findings and alternative findings that allow for either approval or denial of the project, in accordance with Mono County General Plan, Chapter 32, Processing-Use Permits.

Section 32.010, Required Findings:

1. *All applicable provisions of the Mono County General Plan are complied with, and the site of the proposed use is adequate in size and shape to accommodate the use and to accommodate all yards, walls and fences, parking, loading, landscaping and other required features because:*
  - a) The project is located within the June Lake Village area on a property designated Mixed Use. This designation is intended to provide for a wide range of compatible resident and visitor-oriented residential and commercial uses.

The site is adequate to accommodate transient rental for up to 12 persons total and four vehicles total. The property contains four units, two units will remain long-term rentals and two units will be used for transient rental. Transient rentals are operated in a manner similar to long-term residential occupancy.

The property has a shed nonconforming to the side-yard setback, and the property is nonconforming to lot coverage and snow-storage standards. The following criteria

shall be considered by staff during the review of any application to expand/alter a nonconforming use (General Plan Land Use Element §34.020):

*A. Alterations of the nonconforming use shall not be detrimental to the intent of the land use designations, objectives and policies, specified in this General Plan.*

The alteration taking place is a change of use for two of the four existing residential units on the property. No new development is proposed, and the nonconforming components are not detrimental to the residential use of the property. The shed encroaching into the side-yard setback has not generated complaints. The amount of available snow-storage is 49' sf less than what is required and has not caused impacts to surrounding neighbors, and additional snow storage area can be provided if the shed is moved. Per General Plan Chapter 26 and the Vacation Home Rental Permit standards, snow removal is required for all parking and walkways. The applicant has stated that they will contract for snow-removal during winter months. The property exceeds the maximum lot coverage of 60% by 11%. The property was developed in 1980 as two separate parcel and merged in 1992. No new development has taken place, other than the placement of the nonconforming 10' x 10' shed, however without the shed the property remains over lot coverage by 532' sf.

The nonconforming elements will not be detrimental to the use of the property as a transient rental.

*B. The granting of permission to alter the nonconforming use shall not be substantially detrimental to the public health, safety or welfare or injurious to the property or improvements in the vicinity or adversely impact the surrounding properties more than the existing nonconforming use.*

The existing nonconforming features of the property will not be exacerbated by the change in use of two units from long-term rental to transient rental at this property. The change in use and nonconforming features will not have detrimental effects to public health, safety, or welfare, or be injurious to property or improvements in the vicinity. There is no record of complaints filed against the property and the property has not changed significantly since its initial development. The applicant/owner will contract for snow removal, mediating impacts of snow-storage. Transient rentals adjacent to, and within the vicinity of this project have not had detrimental impacts to surrounding properties.

*C. The alteration shall not increase the intensity of the use-category of the land, building or structure.*

No alteration to the nonconforming features will take place. The project will grant a change in use for two of the four units. Transient rental use impacts and intensity have been found to be similar to long-term rental use. The

residential use will remain, and the intensity of use is not expected to increase.

*D. If the proposed alteration could generate public controversy, the Director shall refer the application to the Planning Commission for its consideration.*

The project is being considered by the Planning Commission and may be conditioned as seen fit by the Commission. The project has not generated public controversy and is subject to General Plan Chapter 26 standards for mitigating public impacts.

**OR**

- b) The site is existing nonconforming to General Plan land development standards. The existing shed does not meet side-yard setback standards, the property exceeds the maximum lot coverage, and the property lacks the required amount of snow-storage. Occupation by unfamiliar visitors makes management of these nonconforming features more difficult and could impact public health, safety, and welfare, or be injurious to adjacent properties, because visitors would not understand how to efficiently maximize use of space. The change of use to transient rentals for two units may impact available housing units for the local workforce, contrary to General Plan Housing Element policies.
2. *The site for the proposed use related to streets and highways is adequate in width and type to carry the quantity and kind of traffic generated by the proposed use because:*
- a) The parcel is accessed by Foster Avenue. The road is maintained by the County and plowed in the winter. All parking must occur on-site. Off-site parking is prohibited, even when the road may have snow. The kind of traffic generated by the proposed use is similar to that of the existing residential uses. The parking area also meets Chapter 22, Fire Safe Standards. The finding can be made for the project.
3. *The proposed use will not be detrimental to the public welfare or injurious to property or improvements in the area on which the property is located because:*
- a) The project will not be detrimental to the public or property or improvement in the area because the use of the units will be similar to the existing use and the use will be the same as adjacent transient rental properties. The duration of stay by renters is not anticipated to be detrimental to properties in the area. This finding can be made.

**OR**

- b) The Board of Supervisors has enacted a moratorium on all new overnight rentals (rentals less than 30 days) of single-family residences (SFRs) in Mono County. The Board has identified overnight rentals of SFRs as reducing the housing stock for long-term rentals, negatively affecting the ability of local residents and workforce to find housing. This project seeks to eliminate long-term rental of two housing units. Public welfare may be impacted if employers are unable to hire employees due to the lack of available and affordable housing. This finding cannot be made.

4. *The proposed use is consistent with the map and text of the Mono County General Plan because:*

- a) The Mixed-Use land use designation allows the use of a property as a transient rental, consistent with Chapter 26 and area plan policies, subject to a Director Review Permit. The designation also permits commercial lodging subject to a Director Review Permit.

The project is consistent with the following June Lake Area Policies:

- Objective 13.B. Promote well-planned and functional community development that retains June Lake's mountain-community character and tourist-oriented economy.
- Objective 13.I. Maintain the June Lake Village as the Loop's commercial core by providing a wide range of commercial and residential uses in a pedestrian-oriented atmosphere.

The project is consistent with the following June Lake Area Issues/Opportunities/Constraints:

- 19. Opportunities expressed about short-term rentals include meeting a tourism market need, economic development for June Lake, tax revenue for the County, assisting homeowners in keeping and upgrading their properties, the potential for reduced impact compared to long-term rentals, accountability and enforcement through regulation, protecting property rights, and educating, socializing with, and serving as ambassadors to visitors.
- 57. The June Lake Loop's economy is based upon its tourist industry orientation, and the area must be able to accommodate a significant spike in population during the busiest days. Summer activities such as fishing, camping, hiking and sightseeing presently draws the majority of the Loop's visitors.

This finding can be made.

**OR**

The project is consistent with the following General Plan, Issues/Opportunities/Concerns and should therefore be denied:

- #20, “the majority of the June Lake Loop's rental and affordable units exists in the Village”. Allowing two units to be covered to transient rental will remove units from the long-term rental market available to the local workforce.

This finding cannot be made.

This staff report has been reviewed by the Community Development Director.

## **ATTACHMENTS**

Attachment 1: Public comment letters

Attachment 2: Noticing

# MONO COUNTY

## Planning Division

### NOTICE OF DECISION - USE PERMIT

**USE PERMIT:** CUP 22-004

**APPLICANT:** Devin Valletta

**ASSESSOR PARCEL NUMBER:** 015-111-032

**PROJECT TITLE:** Valletta Transient Rental

**PROJECT LOCATION:** 34 Foster Avenue, June Lake

ANY AFFECTED PERSON, INCLUDING THE APPLICANT, NOT SATISFIED WITH THE DECISION OF THE COMMISSION, MAY WITHIN TEN (10) DAYS OF THE EFFECTIVE DATE OF THE DECISION, SUBMIT AN APPEAL IN WRITING TO THE MONO COUNTY BOARD OF SUPERVISORS.

THE APPEAL SHALL INCLUDE THE APPELLANT'S INTEREST IN THE SUBJECT PROPERTY, THE DECISION OR ACTION APPEALED, SPECIFIC REASONS WHY THE APPELLANT BELIEVES THE DECISION APPEALED SHOULD NOT BE UPHELD AND SHALL BE ACCOMPANIED BY THE APPROPRIATE FILING FEE.

**DATE OF DECISION:** June 16, 2022

### MONO COUNTY PLANNING COMMISSION

**DATED:** June 16, 2022

- cc:  Applicant
- Public Works
- Building
- Compliance

**CONDITIONS OF APPROVAL**  
**Conditional Use Permit 22-004/Valletta**

1. Transient rental is limited to two units only. The applicant shall identify the units on the Vacation Home Rental permit applications. Occupancy shall not exceed six renters per rental unit and two vehicles per unit.
2. A minimum of ten required parking spaces shall be delineated with striping.
3. Two parking spaces per unit shall be designated for transient rental use with signage identifying the spaces.
4. Vehicle parking shall occur only on the property. Off-site and on-street parking are prohibited. Vehicle(s) shall not obstruct the flow of traffic on Foster Avenue.
5. The existing shed along the east side of the property shall be removed or relocated outside of required setbacks. Provide documentation of condition compliance with submittal of any Vacation Home Rental permit application.
6. The rear property line shall be surveyed, a revised site plan resubmitted to the Mono County Planning Division if changes result, and a resolution agreed upon with the rear yard neighbor at 23 Raymond Avenue (APN 015-111-015-000) prior to application for Vacation Home Rental permits. Provide documentation of condition compliance with application.
7. All rental customers must sleep within the dwelling; customers are not allowed to reside in an RV, travel-trailer, or similar mobile-living unit on the property.
8. A sufficient number of trash receptacles shall be available. Trash and other solid waste shall not be allowed to accumulate in or around the property and shall be removed promptly to a designated landfill, transfer station or other designated site. Property management shall be responsible for the cleanup if the tenants do not properly dispose of trash in bear-proof containers.
9. Transient rental units shall meet the standards and requirements of Mono County General Plan Chapter 26.
10. Prior to operating, the owner shall obtain a Mono County Vacation Home Rental Permit, Mono County Business License and Mono County Transient Occupancy Tax Certificate. The required Housing Mitigation Ordinance (HMO) fees shall be paid prior to business license issuance.
11. The project shall comply with provisions of the Mono County General Plan, Mono County Code, project description, and all conditions.
12. The project shall comply with applicable requirements by other Mono County departments and divisions including, but not limited to, Mono County Building Division, Public Works, and Environmental Health requirements, and any California state health orders.

13. If any of these conditions are violated, this permit and all rights hereunder may be revoked in accordance with Section 32.080 of the Mono County General Plan, Land Development Regulations.
14. Termination: A use permit shall terminate and all rights granted therein shall lapse, and the property affected thereby shall be subject to all the provisions and regulations applicable to the land use designation in which such property is classified at the time of such abandonment, when any of the following occur:
  - A. There is a failure to commence the exercise of such rights, as determined by the Director, within two years from the date of approval thereof or as specified in the conditions. If applicable, time shall be tolled during litigation. Exercise of rights shall mean substantial construction or physical alteration of property in reliance with the terms of the use permit;
  - B. There is discontinuance for a continuous period of one year, as determined by the Director, of the exercise of the rights granted; and
  - C. No extension is granted as provided in Section 32.070 Extensions.
15. Extensions. If there is a failure to exercise the rights of the use permit within two years (or as specified in the conditions) of the date of approval, the applicant may apply for an extension for an additional one year. Only one extension may be granted. Any request for extension shall be filed at least 60 days prior to the date of expiration and shall be accompanied by the appropriate fee. Upon receipt of the request for extension, the Planning Division shall review the application to determine the extent of review necessary and schedule it for public hearing. Conditions of approval for the use permit may be modified or expanded, including revision of the proposal, if deemed necessary. The Planning Division may also recommend that the Commission deny the request for extension. Exception to this provision is permitted for those use permits approved concurrently with a tentative parcel or tract map; in those cases the approval period(s) shall be the same as for the tentative map.
16. Revocation. The Commission may revoke the rights granted by a use permit and the property affected thereby shall be subject to all of the provisions and regulations of the Land Use Designations and Land Development Regulations applicable as of the effective date of revocation. Such revocation shall include the failure to comply with any condition contained in the use permit or the violation by the owner or tenant of any provision pertaining to the premises for which such use permit was granted. Before the Commission shall consider revocation of any permit, the Commission shall hold a public hearing thereon after giving written notice thereof to the permittee at least 10 days in advance of such hearing. The decision of the Commission may be appealed to the Board of Supervisors in accordance with Chapter 47, Appeals, and shall be accompanied by an appropriate filing fee.



**Wendy Sugimura**

---

**From:** cynthia\_mps@verizon.net  
**Sent:** Tuesday, June 7, 2022 10:11 AM  
**To:** Michael Draper  
**Subject:** Valleta Site Plan Application - Permit 22-004/Valleta

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

You don't often get email from cynthia\_mps@verizon.net. [Learn why this is important](#)

**[EXTERNAL EMAIL]**

Dear Mr. Draper,

This is regards to the hearing for Permit 22-004/Valleta. Our property at 23 Raymond Avenue, June Lake sits directly behind the Valleta property. After reviewing the plot map submitted by the Valleta's, I have issue with the 5 ft boundary marked behind their property. The actual property line is at the roof line of the their property, causing an encroachment of the back door and steps that go onto our property. (Please see county map for the property line.) The property next to ours, a new build by Carter Family, on Raymond Avenue had their property surveyed last year and there are survey markers in the ground for your review. Many witnessed the laser from the Surveyor and saw that the property line went across the wooden steps of the back property. My husband and I would like to join the zoom meeting on June 15<sup>th</sup>, to object to the property line in question. We have no problem with them converting the property from a 4 unit to a 2 unit, however we do have a problem with them claiming our property as theirs and further encroaching on our property. Any future renovations should require them removing the back door and the steps eliminating the encroachment onto our property.

Please let me know if there is a way forward to resolve the inaccurate map submitted by the Valleta's.

Regards,

Cynthia Deack (562) 861-9716

Property Owner

23 Raymond Avenue

June Lake, CA 93529

# MONO COUNTY PLANNING COMMISSION

---

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

May 31, 2022

## NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Mono County Planning Commission will conduct a public hearing on **June 16, 2022**. As authorized by AB 361, Mono County has declared a state of emergency, local officials have recommended or imposed measures to promote social distancing, and the legislative body has made such findings; therefore the meeting will be accessible remotely by livecast at: <https://monocounty.zoom.us/j/88293941545> and by telephone at: 669-900-6833 (Meeting ID# is 882 9394 1545) where members of the public shall have the right to observe and offer public comment, to consider the following: **9:00 a.m. Use Permit 22-004/Valletta**. The proposal is to create a transient rental of two, two-bedroom units within the existing four-unit multi-family complex located at 34 Foster Avenue, June Lake (APN 015-111-032). The property is designed Mixed Use and is 0.23 acres. The rentals will provide a total of four parking spaces and each unit will have a maximum occupancy not to exceed six persons. Project materials are available for public review online at <https://monocounty.ca.gov/planning-commission> and hard copies are available for the cost of reproduction by calling 760-924-1800. INTERESTED PERSONS are strongly encouraged to attend the livecast meeting by phone or online, and to submit comments to the Secretary of the Planning Commission, PO Box 347, Mammoth Lakes, CA, 93546, by **8 am on Wednesday, March 16**, to ensure timely receipt, by email at [cddcomments@mono.ca.gov](mailto:cddcomments@mono.ca.gov) or via the livecast meeting (technology permitting). If you challenge the proposed action(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to Secretary to the Planning Commission at, or prior to, the public hearing.

# Mono County Community Development

P.O. Box 347  
Mammoth Lakes, CA 93546  
(760) 924-1800, fax 924-1801  
commdev@mono.ca.gov

P.O. Box 8  
Bridgeport, CA 93517  
(760) 932-5420, fax 932-5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 16, 2022

**To: Mono County Planning Commission**

**From:** Bentley Regehr, Planning Analyst

**Re: Adoption of the Resource Efficiency Plan and Recommendation on the Vehicle Miles Traveled (VMT) Thresholds of Significance and Screening Criteria**

## RECOMMENDATION

1. Hold a public hearing and receive comments, deliberate and make any desired modifications.
2. Adopt the updated Resource Efficiency Plan, the associated Addendum to the 2015 Mono County General Plan Environmental Impact Report (EIR), and direct staff to file a Notice of Determination.
3. Recommend the Board of Supervisors adopt the presented thresholds of significance and screening criteria for the purpose of analyzing impacts under the California Environmental Quality Act (CEQA) related to Vehicle Miles Traveled (VMT) and the associated Addendum to the 2015 Mono County General Plan Environmental Impact Report (EIR).

## BACKGROUND

### Resource Efficiency Plan

The 2014 Resource Efficiency Plan (REP) was prepared as part of a targeted update to the General Plan under the Sustainable Communities Planning Grant. The REP outlined strategies to reduce energy consumption, support local sustainability initiatives, and establish compliance with California climate change legislation. Recently, the State of California passed legislation that targets a 2050 statewide goal of reducing greenhouse gas (GHG) emissions by 80 percent of 1990 levels. The County used SB-2 grant funds to hire Ecoshift in the fall of 2021 to update the REP. The REP updates reflect the results of the 2020 emissions forecasting and current modeling that reflects recent projects developed by the County and changes in State policy.

The REP includes the following:

- (1) An assessment of local activities that consume resources and generate GHG emissions.
- (2) Mono County's strategy to improve resource efficiency and reduce GHG emissions.
- (3) The steps necessary to successfully implement the updated REP.

The REP update includes baseline GHG inventories for both County government operations and for the community at-large for the calendar year 2019. The 2014 REP proposed approximately 120 actions appropriate for the rural nature of the county. They included implementing net-zero energy policies for County facilities, replacing and consolidating vehicles in the County fleet, and strategic opportunities to improve resource efficiency by residents, businesses, and visitors. This REP update sets new reduction targets consistent with the 2017 California Air Resources Board (CARB) Scoping Plan based on updated inventories and forecasts for the County and recent statewide policies and mandates. The REP policies were adopted as part of the County's General Plan in 2015 and have not been modified as part of this update.

The update also allows for compliance with §15183.5 which allows for California Environmental Quality Act (CEQA) streamlining. Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as an REP. Project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. This allows for an expedited review of GHG impacts for most development projects.

The REP was presented at the May Planning Commission meeting and is available at [https://monocounty.ca.gov/sites/default/files/fileattachments/planning\\_commission/meeting/32277/mono-county-may-2022-rep.pdf](https://monocounty.ca.gov/sites/default/files/fileattachments/planning_commission/meeting/32277/mono-county-may-2022-rep.pdf). No changes have been made since.

#### Vehicle Miles Traveled Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines encourage public agencies to develop and set generally acceptable thresholds of significance to be used in determining the significance of a project's environmental effects. CEQA Guidelines Section 15064.7(a) defines a threshold of significance as an identifiable quantitative, qualitative, or performance level of a particular environmental effect.

Recent changes in state law under SB-743 require the County to use vehicle miles traveled (VMT) instead of Level of Service (LOS) as the metric to evaluate transportation impacts under CEQA. LOS analyzes level of congestion generated by a project, while VMT analyzes the total vehicle miles traveled generated by a project. Establishing a set of thresholds and screening criteria for VMT allows the County to streamline qualifying projects, thereby reducing the time and cost of the CEQA analysis.

Using Senate Bill-2 (SB-2) funds, the County hired a consultant (Ecoshift) in the fall of 2021 to establish reasonable and acceptable thresholds of significance for VMT. Table 1 shows the screening parameters established by the study. If a project qualifies for one the screening parameters, then no additional analysis is required for VMT under CEQA. Table 2 shows the thresholds of significance for a project. If the project does not exceed any of the thresholds listed, then no additional analysis is required for VMT under CEQA. As part of the scope of work contract, Ecoshift also provided a VMT mapping tool that allows staff to easily calculate and evaluate VMT generated by a project on a parcel specific basis.

To verify threshold levels, CEQA analysis of recent past projects were reviewed and the following determinations were made: 1) Projects found to have no significant VMT impacts would have been exempted under the proposed thresholds, and 2) The thresholds would not exempt projects with the potential for significant VMT impacts based on comparisons to past projects.

**Table 1: Screening Criteria for VMT**

TYPE	SCREENING CRITERIA
Located in a VMT Efficient Area (see green areas in Figures ES-1 and ES-2)	<ul style="list-style-type: none"> <li>Residential project located in an area where VMT/Capita is 15% or more below the base year countywide average less Mammoth Lakes</li> <li>Office/Business Professional Employment project located in an area where VMT/Employee is 15% or more below the base year countywide average less Mammoth Lakes</li> <li>Industrial project located in an area VMT/Employee is at or below the base year countywide average less Mammoth Lakes<sup>1</sup></li> </ul>
Small Projects	<ul style="list-style-type: none"> <li>Generates less than 237 daily unadjusted trip ends</li> </ul>
Proximity to Transit	<ul style="list-style-type: none"> <li>Located within ½ a mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor<sup>2,3</sup></li> </ul>
Retail/Recreational/	<ul style="list-style-type: none"> <li>200,000 square feet of total gross floor area or less</li> <li>A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Local-Serving Public Facilities	<ul style="list-style-type: none"> <li>200,000 square feet of total gross floor area or less</li> <li>A quasi-public facility project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>100% affordable units based on County criteria</li> </ul>
Mixed Use Project	<ul style="list-style-type: none"> <li>Project's individual land uses should be compared to the screening criteria above</li> </ul>
Redevelopment Project	<ul style="list-style-type: none"> <li>Proposed project's total project VMT is less than the existing land use's total VMT</li> </ul>

**Table 2: Thresholds of Significance for VMT**

LAND USE TYPE	THRESHOLD FOR DETERMINATION OF A SIGNIFICANT VMT IMPACT <sup>1</sup>
Residential	15% below Baseline Countywide Average of VMT/Capita Less Mammoth Lakes VMT/Capita: $29.1 \times .85 = 24.8$ <b>VMT/Capita</b>
Office / Business / Warehouse / Manufacturing	15% below Baseline Countywide Average of VMT/Employee Less Mammoth Lakes VMT/Employee: $11.95 \times .85 = 10.2$ <b>VMT/Employee</b>
Industrial <sup>2</sup>	VMT/Employee is at or below the base year countywide average less Mammoth Lakes = <b>11.95 VMT/Employee</b>
Retail	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Hotel/Motel	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Recreational	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Medical/Hospital	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Public Facilities	Does not contain regional public uses
Mixed Use	Analyze each land use individually per above categories and evaluate independently
Redevelopment	Apply the relevant threshold based on proposed land use
Notes:	
<ol style="list-style-type: none"> <li>Projects that exceed these thresholds would have a significant impact under CEQA.</li> <li>Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.</li> </ol>	

Figure ES-1: VMT per capita by community area

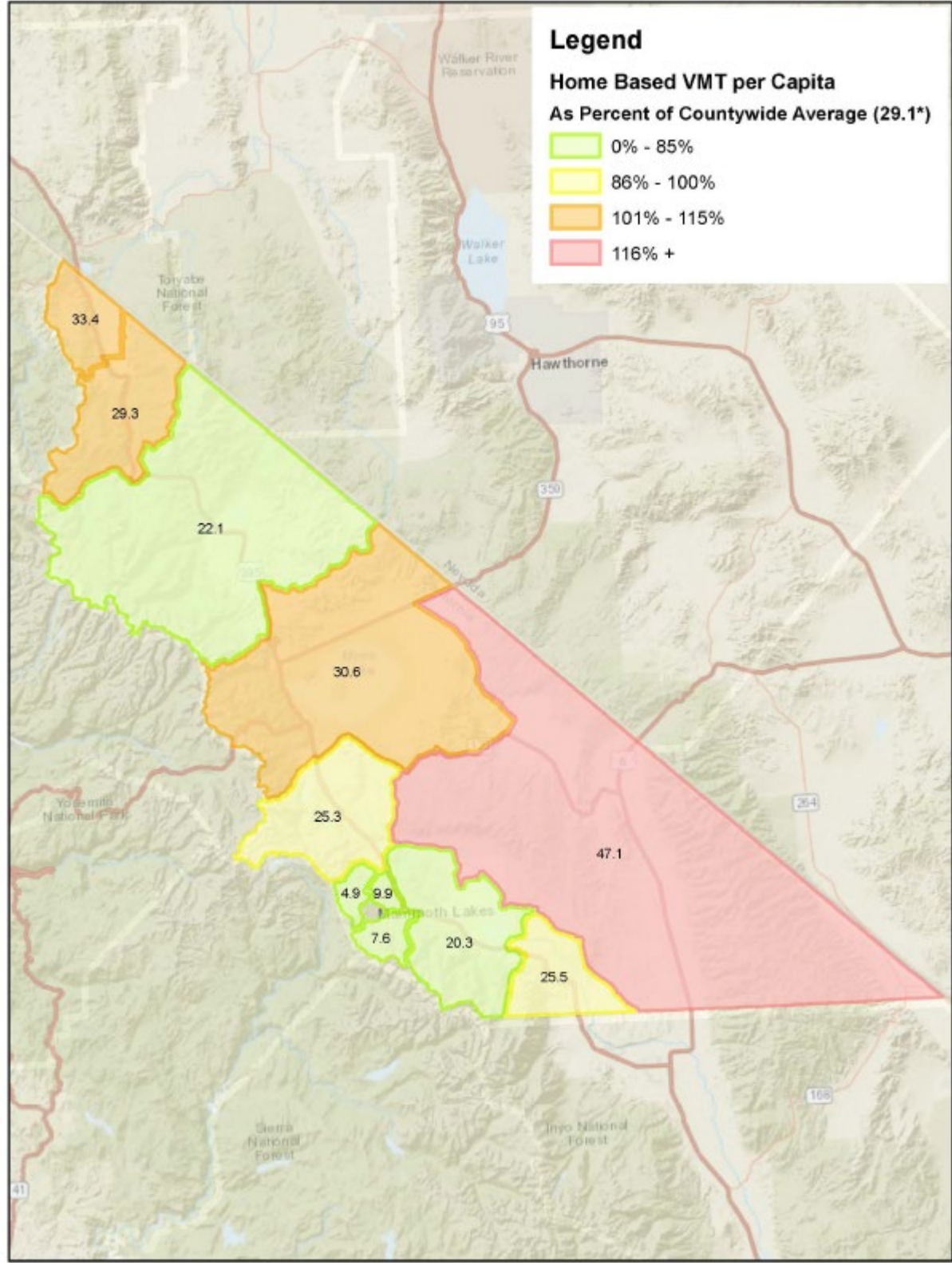
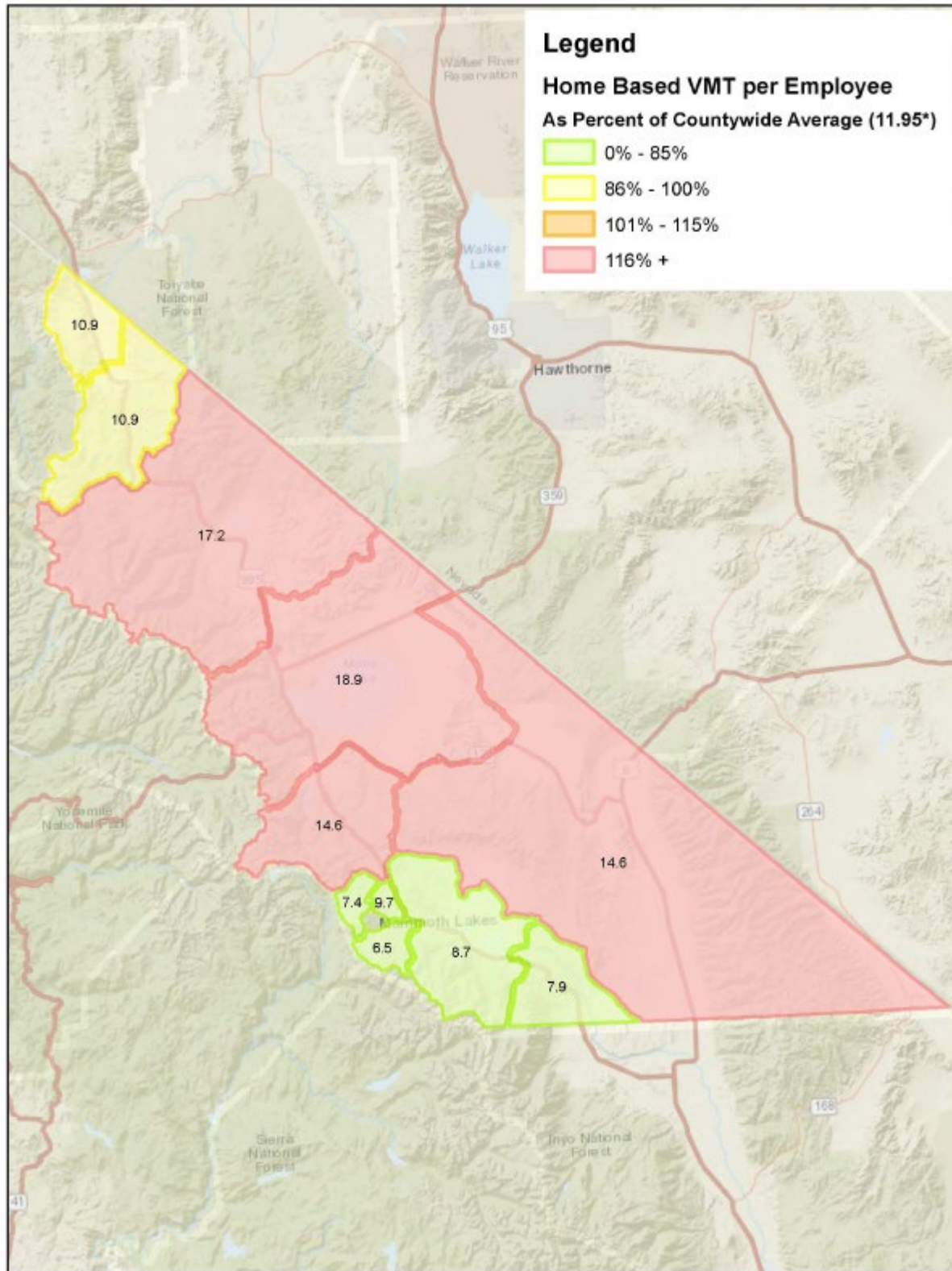


Figure ES-2: Home Based VMT per Employee



**CEQA Compliance**

CEQA Guidelines Section 15164 states that the lead agency or responsible agency shall prepare an addendum to a previously certified Environmental Impact Report (EIR) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. It was determined through an Addendum to the 2015 Mono County General Plan EIR (Attachment 2) that none of the conditions calling for preparation of a subsequent EIR have occurred. The VMT thresholds and screening criteria establish thresholds for evaluation of VMT impacts in compliance with CEQA that are consistent with State policy and guidance. Adoption of the VMT thresholds and screening criteria would not cause an impact on the environment; therefore, additional analysis of the VMT threshold and screening criteria is not required.

**Attachments**

1. Resource Efficiency Plan Update available at [https://monocounty.ca.gov/sites/default/files/fileattachments/planning\\_commission/meeting/32277/mono-county-may-2022-rep.pdf](https://monocounty.ca.gov/sites/default/files/fileattachments/planning_commission/meeting/32277/mono-county-may-2022-rep.pdf)
2. Technical Memo on VMT Thresholds
3. Addendum to the 2015 General Plan EIR
4. Public Hearing Notice





## TECHNICAL MEMORANDUM

# VMT THRESHOLDS & PROCEDURES FOR MONO COUNTY

DATE: December 18, 2021

TO: Kristen Cushman | EcoShift

FROM: Jim Damkowitch | DKS Associates

SUBJECT: Mono County SB 743 Implementation –Draft VMT Analysis                      Project 21667-000  
Procedures

### EXECUTIVE SUMMARY

The Senate Bill (SB) 743 legislation specified that the Governor’s Office of Planning and Research (OPR) prepare guidelines for the implementation of SB 743 for environmental clearance of discretionary land use and infrastructure projects under the California Environmental Quality Act (CEQA). Guidance regarding the changes to CEQA initiated by SB 743 is contained in the following documents:

- CEQA Guidelines Revisions: Revisions to the CEQA Guidelines were adopted into CEQA in December 2018 through a formal process conducted by the Natural Resources Agency. Additional changes can only be made through a future CEQA update process.
- Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR’s Technical Advisory) released in December 2018.

While OPR’s Technical Advisory provides recommendations on many aspects of conducting a CEQA transportation analysis using VMT, it does provide latitude for lead agencies to determine several key analysis decisions based on local conditions and data. The VMT thresholds and screening criteria described herein were informed by OPR’s Technical Advisory and tailored to the specific context for Mono County. The change to VMT as the basis for transportation impacts is new to all jurisdictions and agencies in California. As such, Mono County should recognize that these guidelines can be refined over time to reflect new data and information from public and private stakeholders.

### PROJECTS EXEMPT FOR NON-VMT REASONS

There are some non-VMT related CEQA principles that can be applied to certain projects to eliminate the need for VMT analysis. These include the following:

- The project is exempt from CEQA



- The decision required for the project is not discretionary
- The County's discretionary approval does not involve transportation issues, such as design review

The County will consider whether a project meets these or other non-VMT CEQA principles on a case-by-case basis.

Another possibility is when a project was already analyzed in a prior certified CEQA document, including an EIR. CEQA documents that were certified prior to July 1, 2020 do not require a supplemental CEQA analysis of VMT solely based on the fact that there are new CEQA regulations regarding VMT. However, if there are substantial changes to the project analyzed in the certified CEQA document, then the County will determine if the change in the project results in a significant VMT impact resulting in the need for a supplemental analysis using the following guidance:

- If the proposed use meets any of the VMT screening criteria described herein, no VMT analysis is required.
- If the proposed use does not meet any of the VMT screening criteria described herein and the prior certified EIR includes an SB 743 compliant VMT analysis the applicant may opt to perform either (1) a net VMT change assessment (i.e., VMT difference between the previously approved project and the proposed land use change). If the land use change results in lower or equal total VMT than the previously approved project, then no supplemental analysis in a new CEQA document would be required. If the land use change results in a greater VMT than the previously approved project, then a determination of whether this impact is significant under County standards will be made. If the impact is less than significant, analysis in a supplemental CEQA document will not be required. If the impact is potentially significant, then a VMT analysis in a supplemental CEQA document will be required.
- If the proposed use does not meet any of the VMT screening criteria described herein and the prior certified EIR does not include a SB 743 compliant VMT analysis – a full VMT analysis would be required.
- When a certified EIR requires supplemental CEQA analysis of a non-transportation related environmental issue. It is recommended that the County's legal counsel review and provide direction in these cases. These situations will be addressed on a project-by-project or case-by-case basis.

When a certified EIR requires supplemental CEQA analysis for a project, there is a presumption against requiring VMT analysis as part of that supplemental review unless the County's legal counsel determines VMT analysis is required based on CEQA case law or standards in effect at that time.



## RECOMMENDED THRESHOLDS AND SCREENING CRITERIA

---

While OPR's Technical Advisory provides recommendations on many aspects of conducting a CEQA transportation analysis using VMT, OPR's guidance is not comprehensive and some key decisions are left for lead agencies to determine. The Technical Advisory is not formally included in CEQA and can be revised by OPR at any time without going through a formal process. Updated versions of the Technical Advisory are expected to be issued by OPR as new information becomes available and as California agencies gain experience in applying SB 743 to actual projects.

Although OPR's Technical Advisory provides a substantial amount of information on how to conduct a VMT analysis under CEQA, additional work is needed at the local level, either through an overall guidance document or on a case-by-case basis as individual studies are conducted. The Technical Advisory provides statewide guidance based on evidence collected by OPR that can be refined or modified by local agencies with appropriate justification and substantial evidence. The Technical Advisory suggests various thresholds for the significance of VMT impacts but does not require the use of a particular threshold. Lead agencies have discretion to select their preferred significance thresholds and could choose to use the thresholds suggested in the Technical Advisory or develop alternative thresholds.

The recommended SB 743 VMT screening criteria for Mono County are listed in **Table ES-1**. Recommended VMT thresholds are listed in **Table ES-2**. Maps showing VMT/capita rates (for residential developments) and VMT/employee rates (for non-residential developments) by Census Block Group relative to the countywide average less Mammoth Lakes are presented in **Figure ES-1** and **Figure ES-2** respectively. Block Groups shaded green are considered to be VMT efficient areas for either residential or non-residential the land uses respectively.



**TABLE ES-1 SCREENING CRITERIA FOR CEQA TRANSPORTATION ANALYSIS**

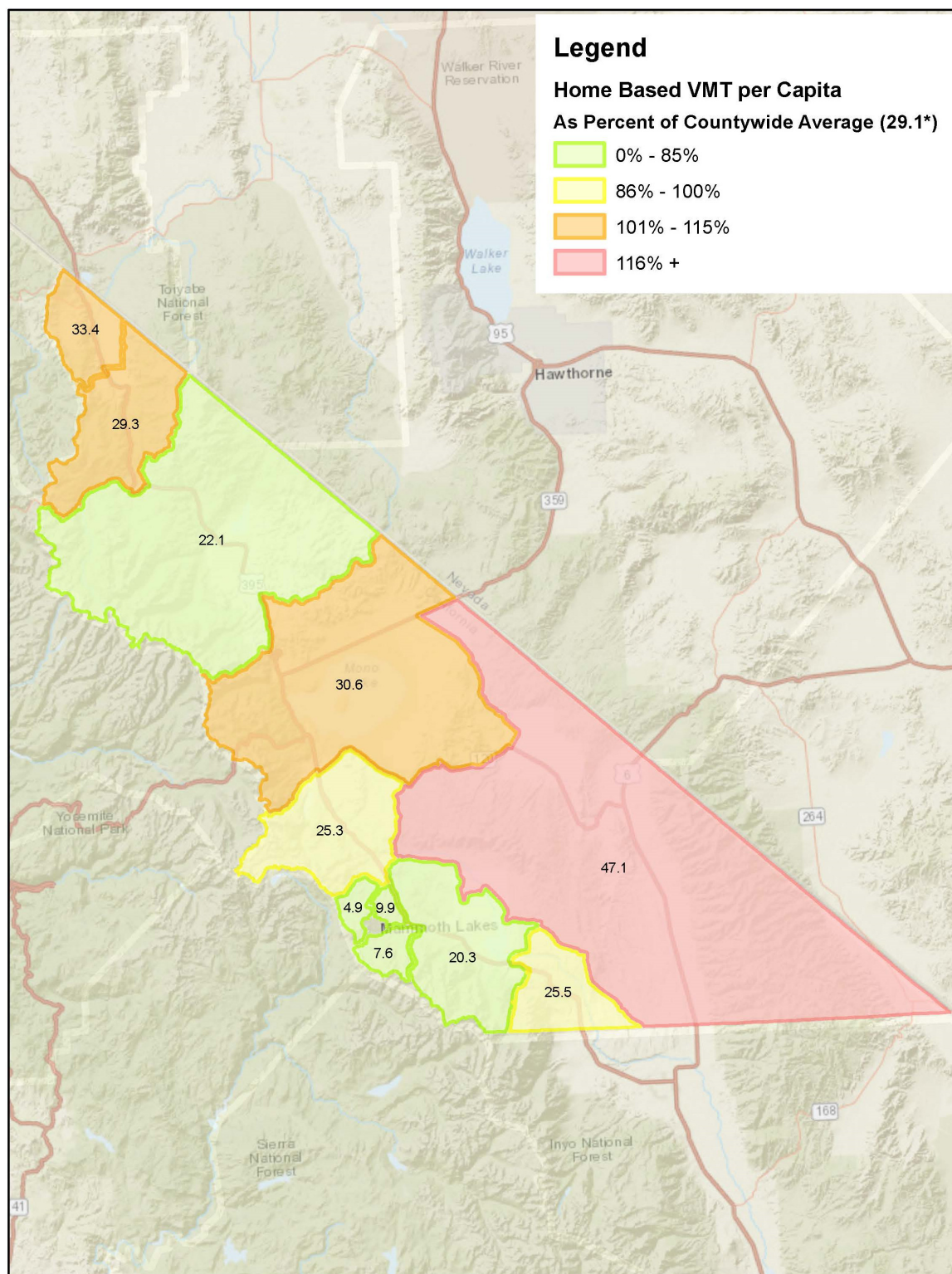
TYPE	SCREENING CRITERIA
Located in a VMT Efficient Area (see green areas in Figures ES-1 and ES-2)	<ul style="list-style-type: none"> <li>• Residential project located in an area where VMT/Capita is 15% or more below the base year countywide average less Mammoth Lakes</li> <li>• Office/Business Professional Employment project located in an area where VMT/Employee is 15% or more below the base year countywide average less Mammoth Lakes</li> <li>• Industrial project located in an area VMT/Employee is at or below the base year countywide average less Mammoth Lakes<sup>1</sup></li> </ul>
Small Projects	<ul style="list-style-type: none"> <li>• Generates less than 237 daily unadjusted trip ends</li> </ul>
Proximity to Transit	<ul style="list-style-type: none"> <li>• Located within ½ a mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor<sup>2,3</sup></li> </ul>
Retail/Recreational/	<ul style="list-style-type: none"> <li>• 200,000 square feet of total gross floor area or less</li> <li>• A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Local-Serving Public Facilities	<ul style="list-style-type: none"> <li>• 200,000 square feet of total gross floor area or less</li> <li>• A quasi-public facility project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>• 100% affordable units based on County criteria</li> </ul>
Mixed Use Project	<ul style="list-style-type: none"> <li>• Project’s individual land uses should be compared to the screening criteria above</li> </ul>
Redevelopment Project	<ul style="list-style-type: none"> <li>• Proposed project’s total project VMT is less than the existing land use’s total VMT</li> </ul>
<p><sup>1</sup> Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.</p> <p><sup>2</sup>Situations where the project footprint is partially within the ½ buffer will be addressed by the County on case-by-case, project-by-project basis.</p> <p><sup>3</sup> Major transit stop means a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours”).</p>	

**TABLE ES-2 VMT THRESHOLDS OF SIGNIFICANCE FOR DEVELOPMENT PROJECTS**

LAND USE TYPE	THRESHOLD FOR DETERMINATION OF A SIGNIFICANT VMT IMPACT <sup>1</sup>
Residential	15% below Baseline Countywide Average of VMT/Capita Less Mammoth Lakes VMT/Capita: 29.1 .85 = <b>24.8 VMT/Capita</b>
Office / Business / Warehouse / Manufacturing	15% below Baseline Countywide Average of VMT/Employee Less Mammoth Lakes VMT/Employee: 11.95 x .85 = <b>10.2 VMT/Employee</b>
Industrial <sup>2</sup>	VMT/Employee is at or below the base year countywide average less Mammoth Lakes = <b>11.95 VMT/Employee</b>
Retail	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Hotel/Motel	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Recreational	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Medical/Hospital	No net increase in total Countywide VMT Less Mammoth Lakes (net VMT change)
Public Facilities	Does not contain regional public uses
Mixed Use	Analyze each land use individually per above categories and evaluate independently
Redevelopment	Apply the relevant threshold based on proposed land use
Notes: 1. Projects that exceed these thresholds would have a significant impact under CEQA. 2. Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.	



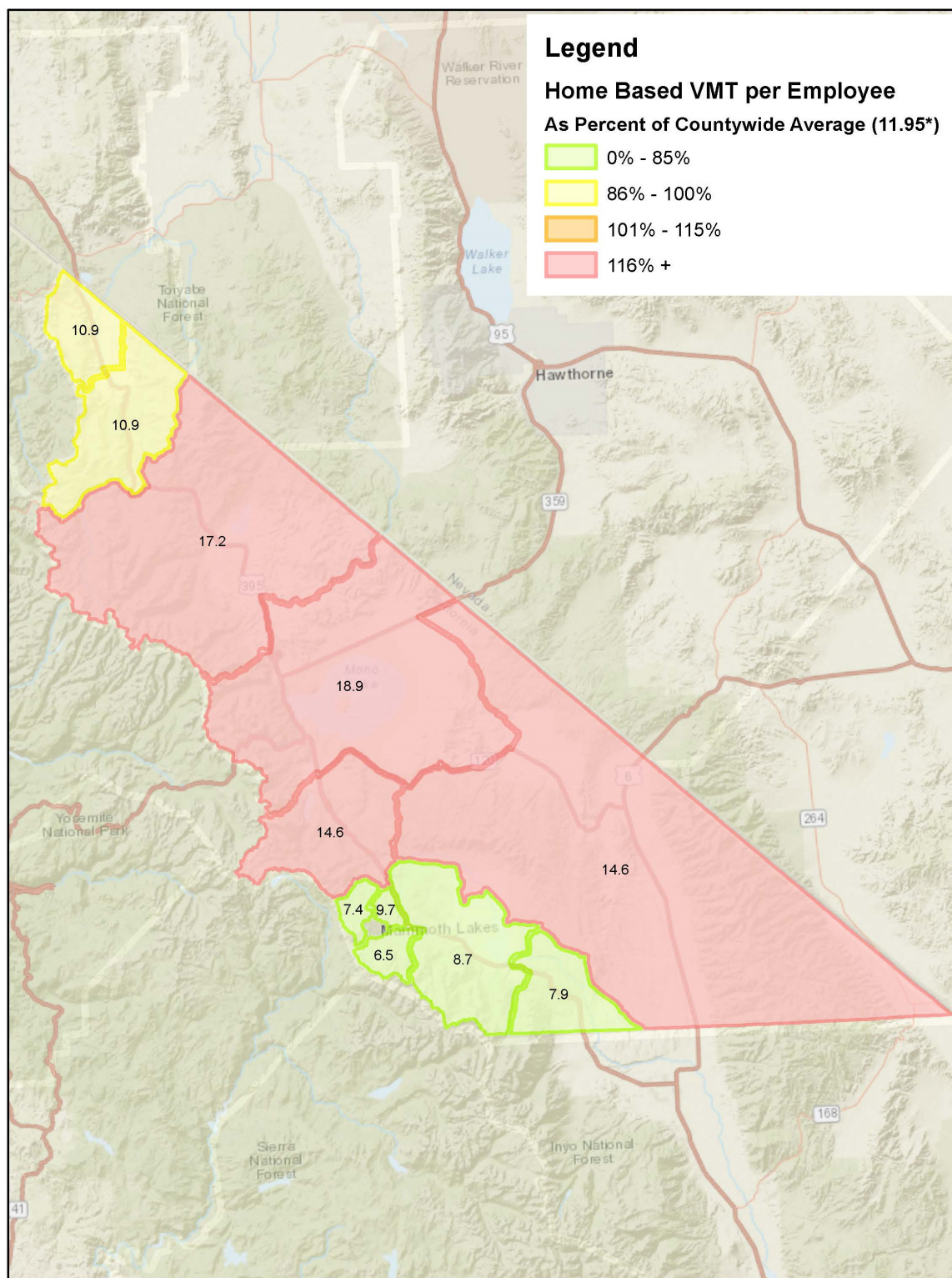
FIGURE ES-1 VEHICLE MILES TRAVELED PER CAPITA BY TAZ: COUNTYWIDE AVERAGE



Note \* Countywide Average Excludes CSTDM TAZ 3023 (Mammoth Lakes)



FIGURE ES-2 VEHICLE MILES TRAVELED PER EMPLOYEE BY TAZ: COUNTYWIDE AVERAGE



Note \* Countywide Average Excludes CSTDM TAZ 3023 (Mammoth Lakes)



## BACKGROUND AND INTRODUCTION

In accordance with Senate Bill 743 (SB 743) and the resulting changes to the California Environmental Quality Act (CEQA) Guidelines published by the Natural Resources Agency, local agencies may no longer use measures of vehicle delay such as Level of Service (LOS) to quantify transportation impacts on the environment. While agencies may continue to maintain LOS standards and similar measures as a matter of local policy and for project analysis, Vehicle Miles Traveled (VMT) has been codified in the CEQA Guidelines as the most appropriate measure for measuring transportation impacts under CEQA. This change applies statewide as of July 1, 2020.

The change from LOS to VMT for CEQA purposes requires the County to revise its process and guidelines, which now must address VMT thresholds of significance, screening, and mitigation procedures.

The purpose of this memorandum is to:

- document guidance, options, resources, and analytical methodologies for evaluating VMT in Mono County; and,
- document the County's recommended VMT thresholds, project screening criteria, and mitigation strategies

The information and recommendations detailed in this memorandum draws heavily on technical guidance published by the Governor's Office of Planning and Research (OPR) and an evaluation of greenhouse gas and VMT mitigation strategies from the California Air Pollution Control Officers Association (CAPCOA). These documents are described in the following section and listed in the References section.

## LEGISLATIVE BACKGROUND

Senate Bill (SB) 743 was signed into law in 2013, with the intent to better align California Environmental Quality Act (CEQA) practices with statewide sustainability goals related to efficient land use, greater multi-modal choices, and greenhouse gas reductions. The provisions of SB 743 become effective Statewide on July 1, 2020. Under SB 743, automobile delay, traditionally measured as level of service (LOS) will no longer be considered an environmental impact under CEQA. Instead, impacts will be determined by changes to VMT.

VMT measures the number and length of vehicle trips made on a daily basis:

$$\text{VMT} = \sum (\text{Volume (vehicles/day)} * \text{Segment Length (miles)})$$

(for all segments in the geographic area)





VMT is a systemic metric and is a useful indicator of overall land use and transportation efficiency, where the most efficient system is one that minimizes VMT by encouraging shorter vehicle trip lengths, more walking and biking, or increased carpooling and transit.

It should be noted that VMT is not a good indicator of congestion nor is it useful for identifying hot-spot locations or infrastructure deficiencies. Operational analyses may still be required by the County of Mono (called Local Traffic Study) to make General Plan consistency findings that will potentially inform project conditions of approval through the entitlement process. However, findings of a Local Traffic Study will not be used to inform CEQA traffic impacts.

Measuring VMT requires estimating or measuring the full length of vehicle trips by purpose, such as commutes, deliveries, or shopping trips that often cross between cities, counties, or states. For this reason, regional travel demand models, "big data," and household travel surveys that are less limited by local agency boundaries are useful tools to estimate VMT for SB 743 applications.

### **GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR) TECHNICAL ADVISORY**

---

In December 2018, OPR released its final Technical Advisory on Evaluating Transportation Impacts in CEQA. Generally, OPR recommends that a reduction of 15% or more in VMT should be the target. Below is a summary of OPR's recommended VMT impact thresholds and methodologies for land use projects:

**Residential (VMT/capita)** – A proposed project exceeding a level of 15% below existing regional VMT per capita may indicate a significant transportation impact.

**Office (VMT/employee)** - A proposed project exceeding a level of 15% below existing regional VMT per employee may indicate a significant transportation impact.

**Retail (net VMT)** – A proposed project that results in a net increase in total area VMT may indicate a significant transportation impact.

**Mixed-Use** - Evaluate each component independently using above thresholds.

**Redevelopment Projects** - Measured based on net change in VMT for total area.

**Infrastructure Projects (net VMT)** – A proposed project that results in a net increase in total area VMT may indicate a significant transportation impact.

The OPR recommended thresholds for residential and office are expressed on a per capita or per employee basis. This essentially normalizes for development size. For example, a 10,000 sq.ft. office development can yield the same VMT per employee result as a 100,000 sq.ft. office development. Though the absolute amount of VMT and traffic generated by the 100,000 sq.ft. office project will be significantly greater, it would be considered equally as efficient as the 10,000 sq.ft. development. Project size is partially addressed through OPR's screening thresholds described below.



## OPR RECOMMENDED SCREENING THRESHOLDS

---

OPR's Technical Advisory lists the following screening thresholds for land use projects. OPR's Technical Advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing as described below.

- Projects that are consistent with the Sustainable Communities Strategy (SCS) or General Plan and generate or attract fewer than 110 daily trips (consistent with trip generation associated with projects eligible for a Categorical Exemption under CEQA).
- Map-based screening for residential and office projects located in low VMT areas, and incorporate similar features (density, mix of uses, transit accessibility).
- Certain projects within ½ mile of an existing major transit stop<sup>1</sup> or an existing stop along a high-quality transit corridor<sup>2</sup>. However, this will not apply if information indicates that the project will still generate high levels of VMT.
- Affordable Housing Development in infill locations.
- Locally serving retail projects, typically less than 50,000 square feet.

## CALTRANS VMT-FOCUSED TRANSPORTATION IMPACT STUDY GUIDELINES

---

Caltrans has published an update of their Transportation Impact Study Guidelines (TISG, May 2020). The Caltrans' TISG is intended for use in preparing a transportation impact analysis of land use projects or plans that may impact or affect the State Highway System.

The TISG heavily references OPR's Technical Advisory as a basis for its guidance. The TISG recommends use of OPR's recommended thresholds for land use projects (15% below existing countywide or regional VMT per capita or per employee). As each lead agency develops and adopts its own VMT thresholds for land use projects, Caltrans will review them for consistency with OPR's recommendations, and with the state's GHG emissions reduction targets and the California Air Resources Board Scoping Plan.

Caltrans identifies a possible mitigation framework for projects found to have a potentially significant impact on VMT. These include the following programmatic measures:

- Impact fee programs that contain a demonstrated nexus and proportionality between a fee and capital projects that result in VMT reduction;

---

<sup>1</sup> "major transit stop" - A major transit stop is a "site containing an existing rail, a ferry terminal served by bus or rail transit service, or intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during morning and evening peak hour commute". (OPR 2018)

<sup>2</sup> Pub. Resources Code, § 21155 a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.



- VMT mitigation bank programs; and,
- VMT mitigation exchange programs.

Caltrans also indicates that a future update to the TISG will include the basis for requesting transportation impact analysis that is not based on VMT (including multimodal conflict/access management issues).

### **CALTRANS DRAFT TRANSPORTATION ANALYSIS UNDER CEQA (TAC) AND TRANSPORTATION ANALYSIS FRAMEWORK (TAF)**

---

Caltrans has also published additional documents related to SB 743 implementation. The draft Transportation Analysis Under CEQA (TAC) identifies the State's preferred approaches for analyzing VMT under CEQA for projects on the State Highway System. The draft Transportation Analysis Framework (TAF) is for transportation projects on the state highway system and addresses how to perform induced travel analysis. The TAF refers to OPR's Technical Advisory for the list of highway projects "that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis". TAC Screening:

*"The use of VMT as the CEQA transportation metric will, for the most part, impact only capacity increasing projects. For other types of transportation projects, CEQA does not require a VMT impacts analysis beyond the screening process. Generally, there are two reasons such an analysis is not warranted. The first is because the type of project is expected to decrease or have no impact on VMT. The second is because the project's VMT impacts have already been analyzed and, when necessary, mitigated to the extent feasible in an earlier CEQA document; thus, the analysis may "tier" from or otherwise rely on that earlier analysis."*



## ANALYSIS PROCEDURES

To develop Mono County's VMT Thresholds two primary data and modeling resources were applied: 1) the California Statewide Travel Demand Model (CSTDM); and 2) the Longitudinal Employment and Household Dynamic (LEHD) journey to work data.

In order to reflect the trip length characteristics of the unincorporated county only, VMT metrics were assessed at the countywide level less City of Mammoth Lakes. Both a per capita and per employee VMT baseline averages were developed. These baseline average VMT estimates will be the measuring stick that all future projects will be compared against. In addition, a net VMT change resulting from retail development was also performed using ArcGIS Network Analyst Tool.

### CALIFORNIA STATEWIDE TRAVEL DEMAND MODEL (CSTDM)

The California Statewide Travel Demand Model (CSTDM) was utilized to estimate trip-based Work and Residential Baseline VMT for the unincorporated areas of Mono County. The CSTDM is a traditional 4-Step travel demand model that runs in the CUBE software platform. The model generates trips based on the land uses and where people will live, work, study and shop, taking into account forecasted population growth. The model generates and tracks trip types by all modes originating or ending in each TAZ within Mono County as well as all trips from or into outside counties. However, the CSTDM is limited to the state of California and truncates intercounty trips between Mono County and Nevada. Hence the full-trip length of these inter-state trips is not captured. The CSTDM output used to inform this analysis can be accessed at:

<https://dot.ca.gov/programs/transportation-planning/multi-modal-system-planning/statewide-modeling/sb-743-vmt-impact-assessment>

The CSTDM includes a 2010 base year which was utilized to estimate baseline VMT for Mono County. To estimate trips associated with residential VMT, all Home-Based vehicular trips (HB) internal to Mono County were selected for evaluation of VMT per capita. To estimate trips associated with work VMT, only Home-Base-Work (HBW) vehicular trips were selected for evaluation. The CSTDM reflects Mono County using three Traffic Analysis Zones (TAZs) as shown in **Figure 1**. The CSTDM TAZs conform to the Census Tracts (101, 102, and 103) boundaries are a further disaggregated into 11 Block Groups – 11 of which represent the unincorporated county as shown in **Figure 2**.

### LONGITUDINAL EMPLOYMENT AND HOUSEHOLD DYNAMIC (LEHD) DATA

Longitudinal Employment and Housing Dynamic (LEHD) journey-to-work data was applied to refine the CSTDM VMT output from the TAZ level to the Block Group level for finer granularity. LEHD origin-destination trip data was imported into ArcGIS and assigned onto the roadway network using the Network Analyzer Tool in ArcGIS. Based on shortest-path assignment, trips were assigned onto the network to compute VMT. The LEHD VMT results for the 11 Block Groups was then used to bi-proportionally adjust the CSTDM 3 TAZ results to reflect the 11 Block Groups as well as capture the full trip length for intercounty trips with Nevada trips.

**FIGURE 1 CALIFORNIA STATEWIDE TRAVEL DEMAND MODEL MONO COUNTY TAZ STRUCTURE**

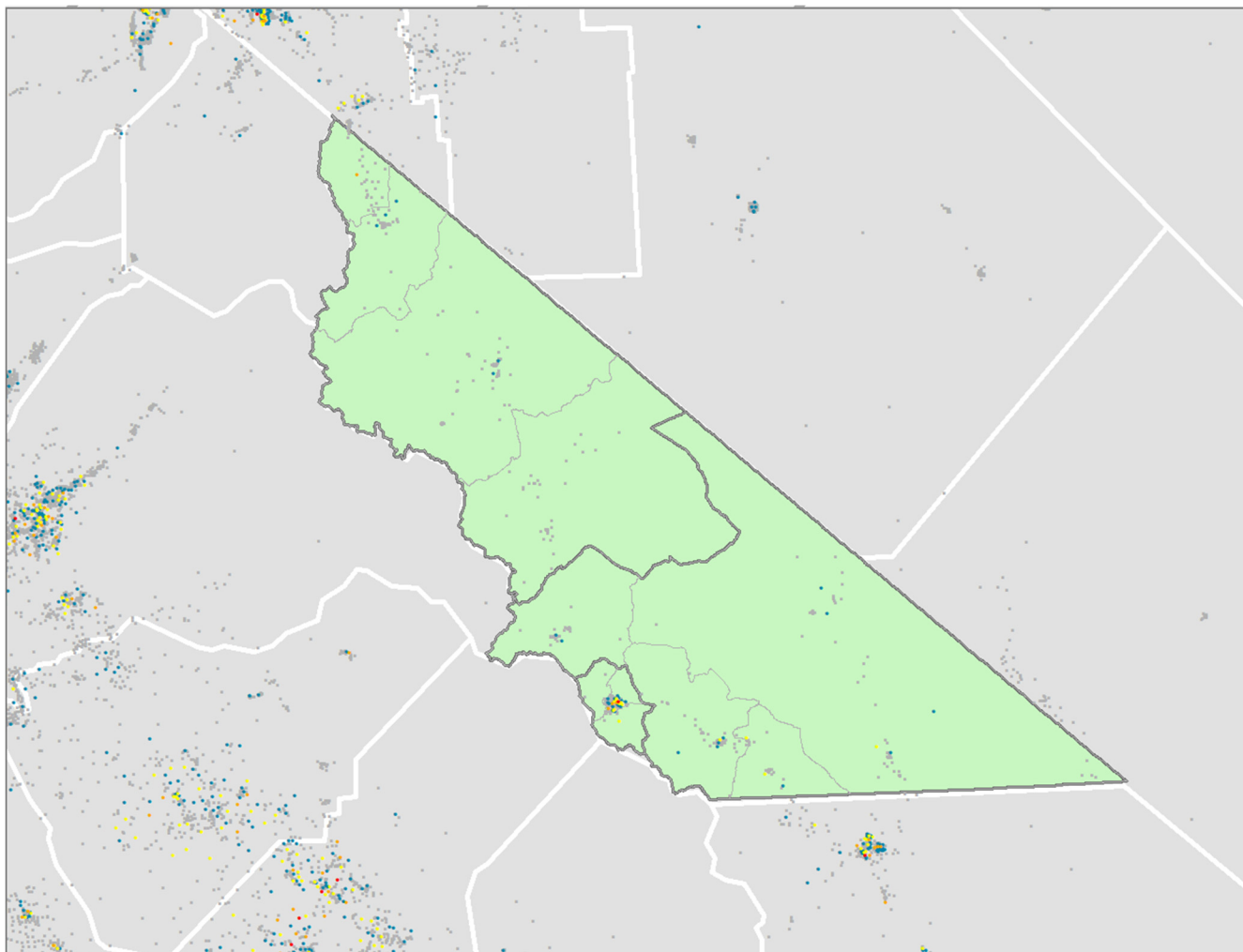
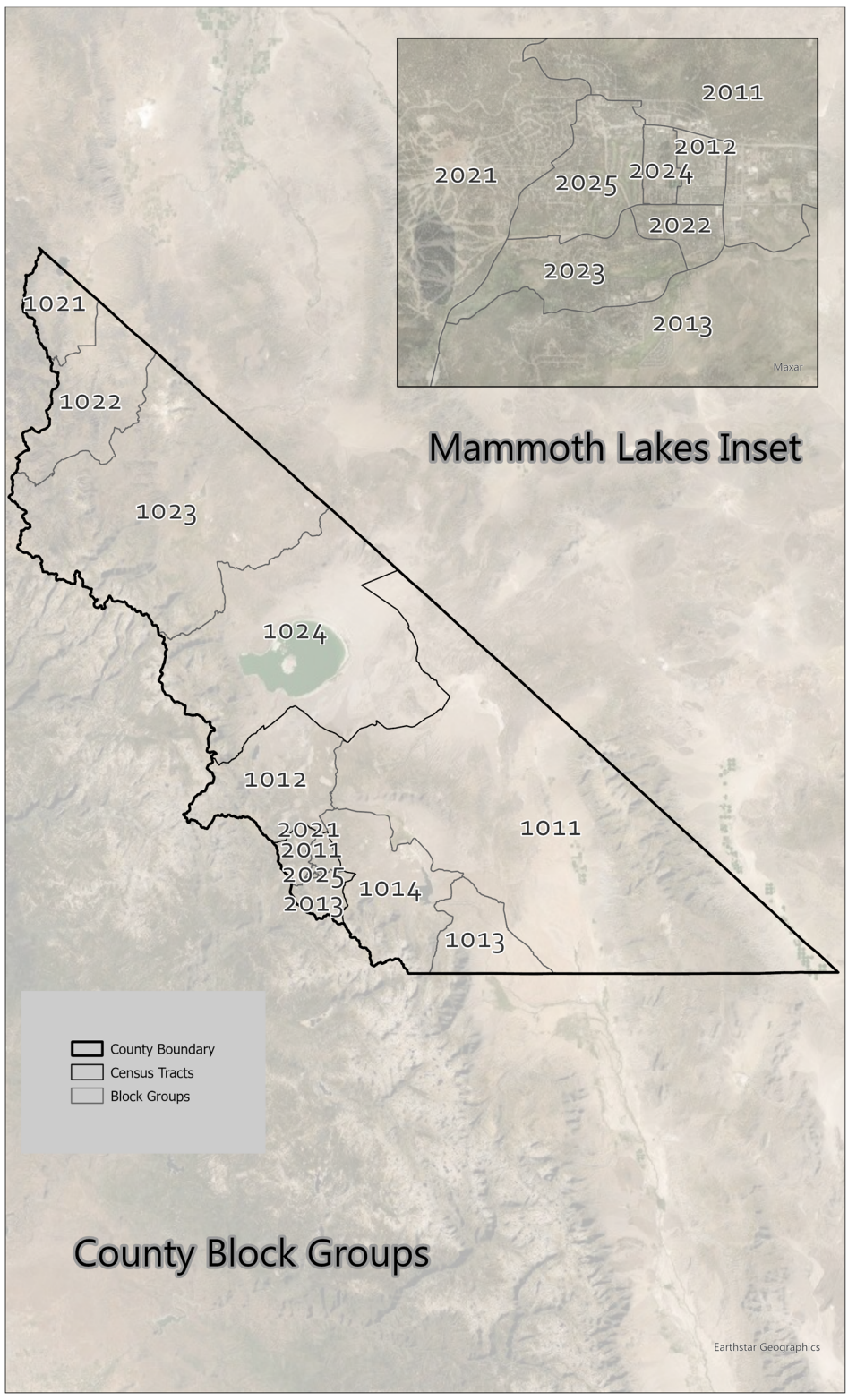




FIGURE 2 MODEL MONO COUNTY CENSUS TRACT STRUCTURE





## PROPOSED VMT THRESHOLDS OF SIGNIFICANCE

### RESIDENTIAL AND NON-RESIDENTIAL PROJECTS

Consistent with the OPR Technical Advisory, Mono County assessed land development projects according to the primary proposed land use type, as follows:

**Residential VMT** – Establish baseline VMT and threshold on a per capita basis. “Residential” uses include, but are not limited to, single-family, multi-family, and mobile homes.

***The recommended thresholds are 85 percent of the existing baseline VMT per land use unit (per capita), as calculated for Mono County for residential (SFDU, MFDU), uses.*** This recommendation is consistent with OPR guidance.

**Work VMT** – Establish baseline VMT and threshold on a per employee basis. “Work” uses include, but are not limited to, office, office parks, warehousing, manufacturing, and business parks.

***The recommended thresholds are 85 percent of the existing baseline VMT per land use unit (per employee), as calculated for Mono County for work (office, commercial, manufacturing), uses.*** This recommendation is consistent with OPR guidance.

**Industrial Projects** – For industrial uses (i.e., light industrial, industrial) the CEQA guidelines specify that the VMT to be considered when analyzing transportation impacts is passenger vehicle VMT. Heavy-duty truck trips (3+ axles), often the predominant type at industrial facilities, would not come into play as a transportation impact (although they would be considered under noise or air quality). Instead, industrial land uses may have to be analyzed on a case-by-case basis to determine the net passenger vehicle (light-duty) VMT impacts of proposed projects. If employee travel is the predominant source of light duty trips at a facility, this component could be assessed against the equivalent VMT per employee threshold for Work VMT. However, for industrial uses, it is recommended that if the project’s VMT/employee is at or below the base year county-wide average VMT/employee it would be screened.

***The recommended threshold is no net increase above the existing baseline VMT per employee, as calculated for Mono County for work (office, commercial, manufacturing), uses.*** This recommendation generally consistent with OPR guidance which does not proscribe the 85 percent of baseline recommendation for industrial uses.

**Mixed Use Projects** - For mixed use projects, OPR recommends either analyzing each component of the proposed project separately or focusing on the predominant land use. This recommendation is consistent with OPR guidance.



**OTHER NON-RESIDENTIAL PROJECT TYPES**

Many types of non-residential land uses function as “converging” facilities (i.e., facilities that the public travels to for goods and services). These types of facilities generally do not generate new trips but serve to redistribute trips that would have occurred regardless. This assume that the goods and services provided by the facility are available elsewhere in Mono County and that the facility provides “redundant” market coverage for potential demand. This includes retail and commercial uses, health facilities, recreational uses, public facilities/services (e.g., library) and others. To assess the anticipated net VMT change resulting from “adding” these land use types within Mono County an analysis was performed in ArcGIS using the Network Analyzer Tool. An Unconstrained Capacity Location Allocation analysis was performed that yields the net VMT associated with shortest path assignment of the countywide population to the nearest facility for each Block Group in the county. The analysis steps were as follows:

- Imported roadway network into ArcGIS;
- Established a geographic centroid and network connector for each Block Group;
- Established population attributes (ACS 2019 data) for each Block Group centroid in ArcGIS;
- Using web-based mapping tools identified and pinned locations that currently have a “like” retail facility and denote in ArcGIS as a node attribute;
- Using the Network Analyzer Tool – optimally assign all nodes to their nearest “like facility” with and without adding a “new” retail facility. Record total VMT (VMT defined as the sum of assigned Pop x Centerline Miles of Shortest Path to Facility); and,
- Repeat for every Block Group in Mono County.

**Table 1** shows the relative VMT totals for each Block Group from adding a new retail facility. As shown, a facility in Block Group 1011 results in a decrease in VMT from 189,657 to 155,378. The green highlighted cells indicate the most efficient Block Group location for reducing travel access distance to a new retail facility. For example, Block Group 1023 benefits from new facilities in many locations but has the best improvement within its own Block Group 1023. Some Block Groups don’t benefit from any of the locations (i.e., the Block Group/s representing the City of Mammoth Lakes).

**TABLE 1. VMT CHANGE RESULTING FROM NEW RETAIL BY BLOCK GROUP**

Facility Location	Total VMT	Reduced Travel Access Distance to Nearest Facility by Block Group																
		1023	2001	2003	2005	2006	2007	1021	1022	1011	1012	2002	2008	1024	2009	1013	2004	1014
No Facility (Baseline)	189,658																	
Facility In 1011	155,379	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-23.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Facility In 1022	122,052	-32.1	0.0	0.0	0.0	0.0	0.0	-21.5	-36.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Facility In 1024	161,827	-28.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-6.3	0.0	0.0	-28.7	0.0	0.0	0.0	0.0
Facility In 1023	136,239	-53.2	0.0	0.0	0.0	0.0	0.0	0.0	-16.3	0.0	0.0	0.0	0.0	-17.2	0.0	0.0	0.0	0.0
Facility In 1013_1014	175,198	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-14.0	0.0	-4.1
Facility In 1012	169,947	-14.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-17.1	0.0	0.0	-14.7	0.0	0.0	0.0	0.0
Facility In 2001_2009	187,571	0.0	0.0	0.0	0.0	-1.5	-0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-1.5	0.0	-0.5	0.0
Facility In 1021	126,394	-27.5	0.0	0.0	0.0	0.0	0.0	-26.1	-31.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

\* City of Mammoth Lakes





**Retail** – Based on this analysis, increasing retail opportunities in unincorporated Mono County will decrease overall VMT by providing intervening opportunities for goods and services that reduce the need for longer trips to Mammoth Lakes. Given the rural context of unincorporated Mono County, the analysis indicates that any new retail facility locating providing duplicate goods and services offered in the City of Mammoth Lakes would result in a net VMT decrease.

***The recommended threshold is no net increase above the existing baseline VMT per employee, as calculated for Mono County for work (office, commercial, manufacturing), uses.*** This recommendation is consistent with OPR guidance.

**Medical** – It is recommended that medical projects be analyzed in terms of net VMT change in a manner similar to retail projects. As with retail, providing additional opportunities for healthcare may reduce the lengths of trips made for this purpose. By this line of reasoning, most freestanding clinics, medical practices, and nursing homes could be assumed less than significant with respect to VMT impacts. Larger or regional-serving facilities such as hospitals would likely require an environmental document. If office uses are included as part of the hospital project description the analysis should consider both employee VMT by applying the recommended thresholds are 85 percent of the existing baseline VMT per employee and patient care VMT by applying the net change threshold separately. This recommendation is consistent with OPR guidance.

**Hotel / Motel Projects** – For hotel/motel projects, the recommended threshold would be similar for regional-serving retail projects. Any increase in total VMT (i.e., net positive VMT change) that occurs as a result of the project would trigger a VMT impact. Determination of whether a given hotel/motel project is locally or regionally serving would be determined by the County on a case-by-case basis. This recommendation is consistent with OPR guidance.

**Recreational Projects** – The recommended threshold for recreational projects would be similar for regional-serving retail projects. Any increase in total VMT (i.e., net positive VMT change) that occurs as a result of the project would trigger a VMT impact. Determination of whether a given recreation project is locally or regionally serving would be determined by the County on a case-by-case basis. This recommendation is consistent with OPR guidance.

## OTHER PROJECT TYPES

---

**Infrastructure Projects** - The OPR recommended threshold for vehicle capacity increasing projects is any increase in total VMT that occurs as a result of the project. The OPR technical advisory lists many transportation infrastructure project types as being VMT neutral (see Screening Procedures).

**Land Use Plans** - The recommended methodology for conducting VMT assessments for land use plans is to compare the existing VMT per capita and/or VMT per employee with the expected horizon year VMT per capita and/or VMT per employee of the land use plan. If there is a net increase in the VMT metric under horizon year conditions, then the project will have a significant impact. This recommendation is consistent with OPR guidance.



## SCREENING PROCEDURES

Screening procedures play an important part in streamlining project analysis. First, projects may be presumed to have less than significant VMT impacts due to size, proximity to high quality transit, and housing affordability. Second, projects may be screened according to location. Projects located in areas that have been shown to generate VMT below the selected threshold of significance may be presumed to have less than significant impacts and no further analysis required.

### SMALL PROJECTS

OPR advises that projects generating fewer than 110 trips per day could be presumed to have less than significant VMT impacts. However, given that rural context of Mono County, the small project screen daily trip generation is recommended to be 237 daily trips. This is consistent with the Project Size VMT screens in practice as adopted by Sacramento County and other jurisdictions in the Sacramento Region. Given that the OPR guidance is generally more applicable to urbanized counties, a 237 daily trip project size screen is considered reasonable for the relatively low-population and rural context of Mono County. Note that the County reserves the authority to require a VMT analysis for discretionary land use projects that fall below the proposed project size screen if the project's VMT characteristics warrant concern.

**Table 2** shows the maximum project size that would correspond to this threshold based on average ITE trip generation rates for selected land uses.

**TABLE 2 PROJECT SIZE THRESHOLDS FOR VMT SCREENING**  
(GENERATION OF 237 OR FEWER DAILY TRIPS)

LAND USE	ITE CODE	SIZE THRESHOLD	DAILY TRIP GENERATION <sup>1</sup>
SINGLE FAMILY RESIDENTIAL	210	25 units	230
MULTIFAMILY RESIDENTIAL - LOW RISE	220	32 units	234
MULTIFAMILY RESIDENTIAL - MID RISE	221	43 units	234
MULTIFAMILY RESIDENTIAL - HIGH RISE	222	53 units	236
MID-RISE RESIDENTIAL WITH 1ST FLOOR COMMERCIAL	231	68 units	234
SMALL OFFICE BUILDING	712	14,650 square feet	237
SINGLE TENANT OFFICE BLDG.	715	21,000 square feet	237

Source: ITE Trip Generation 10<sup>th</sup> Edition (<https://itetripngen.org/>)

<sup>1</sup> ITE Trip Generation 11<sup>th</sup> Edition now in circulation. Updated rates may slightly differ than those used.



## LOW INCOME HOUSING

---

As one of many strategies to address California’s housing crisis, OPR advises that **residential projects consisting of 100 percent affordable units** may be presumed to have less than significant VMT impacts. This recommendation allows for residential projects that include a mix of market-rate housing units and non-market-rate housing units to only perform the project size screen and VMT analysis on only the proportion of units that are market-based. For example, if the project is 100 units with 10 affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).

## LOCAL SERVING RETAIL AND QUASI PUBLIC FACILITIES

---

The OPR technical advisory gives 50,000 square feet for an individual retail establishment as a general guideline to distinguishing local from regional serving retail. Projects consisting of multiple spaces totaling more than 50,000 square feet might also be considered local serving retail if no single establishment is larger. For example, neighborhood centers, convenience oriented centers of up to 125,000 square feet leasable area and typically anchored by a supermarket could be considered local-serving.

For Mono County, a retail project, recreation project, medical facility, or quasi-public land use (i.e., converging facility) is assumed to be local-serving if it has a gross floor area no more than 200,000 square feet. Additionally, a public facility is considered locally serving if it serves the surrounding community or that is a passive use (such as communication and utility buildings, water sanitation, and waste management). A retail, recreation, medical, or quasi-public facility may also be defined as locally-serving if a market study demonstrates that it is based on the size of its market area. Adding retail square footage (even if it is less than the gross floor area listed above) to an existing “regional” retail shopping area should not be screened out.

A listing of land use types including public and quasi-public facilities are listed in **Table 3**.

Mixed Use Project Screening Considerations: The project’s individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project’s land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.



Redevelopment Project Screening Considerations: The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

## PROXIMITY TO TRANSIT

---

Section 15064.3 of the CEQA Guidelines specifies that residential or office projects within one-half mile of an existing major transit station or stop along an existing high-quality transit corridor can be presumed to have a less than significant transportation impact. According to OPR guidance and Public Resources Code § 21064.3, major transit stops are defined as a site containing an existing rail transit station or the intersection of at least two bus routes with a combined frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. High-quality transit corridors are defined as having fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours.

**Transit Priority Areas and High-Quality Transit Corridors** No areas in the unincorporate areas of Mono County currently have the required bus headways or rail stations to qualify as transit priority areas. Provided they meet all other requirements, projects with the minimum residential densities within these areas can qualify as "transit priority projects" as defined in Public Resources Code Section 21155(b) that would be eligible for streamlined environmental review under CEQA. At such time as future transit enhancements increase bus frequencies sufficiently to meet the definition of "major transit stop" or "high-quality transit corridor" and requisite, additional programmatic environmental review has been completed, areas within the unincorporated areas of Mono County can become eligible for consideration as planning and transit priority areas.

**TABLE 3 LAND USE DESIGNATIONS FOR VMT SCREENING AND ANALYSIS**

<b>Land Use Designations for VMT Analysis</b>
<b>Residential (subject to the project size and VMT/capita screens)</b>
Estate Residential (ER)
Low Density Residential (LD/LDR)
Low Density Cluster (LDC)
Medium Density Residential (MD/MDR)
High Density Residential (HDR)
Residential Mixed-Use (RMU) – residential prominent use
Residential Mobile Home (RMH)
Retirement/age-restricted housing
Residential care home/facility
<b>Office/Business Professional Employment (subject to the project size and VMT/employee screens)</b>
Business and Profession Office (BP)
Office Profession Mixed Use (OPMU) - office predominant use
Office Industrial Mixed Use (OIMU)
Hospital
<b>Industrial Employment (subject to VMT/employee screen)</b>
Light Industrial (LI)
Light Industrial Business Park (LIBP)
Industrial Park (MP)
Light Industrial/Manufacturing (M-1)
Heavy Industrial/Manufacturing (M-2)
<b>Retail / Recreation / Quasi-Public Facilities (Converging Demand Facilities) – subject to size and net VMT change screen</b>
General Commercial (GC)
Commercial Mixed-Use (CMU) – commercial prominent use
Village Commercial/Center (VC)
Village Center Mixed Use
Local Town Center (LTC)
Regional Town Center (RTC)
Hotels and motels
Outdoor commercial recreation
Entertainment venues
Golf course
Hospital / Medical Campus etc.
Public K-12 schools (elementary school, middle school, and high school)
Day care center
Library
Post Office



<b>Land Use Designations for VMT Analysis</b>
<b>Public Facilities – Local Serving (automatically screened)</b>
Neighborhood park
Open Space
Park
Police and Fire stations
Utility substations
Water sanitation and waste management facilities
<b>Regional Public Facilities – May Not Be Local Serving – Case by Case Assessment</b>
Airport
University/college
Community college
Private schools (elementary school, middle school, and high school)
Religious institutions
Clubs, lodges, and private meeting halls
Theaters and Auditoriums
Museum
Regional park



## INFRASTRUCTURE PROJECTS

---

Infrastructure projects that **would not likely lead to a substantial or measurable increase in vehicle travel**, and therefore generally should not require an induced travel analysis, include<sup>3</sup>:

- Rehabilitation, maintenance, replacement, safety, and repair projects including ITS field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation such as median barriers and guardrails
- Roadway shoulder enhancements to provide "refuge area," dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length
- Intersection channelization (installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as turn pockets, turn lanes, or emergency breakdown lanes)
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general-purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase

---

<sup>3</sup> Final Technical Advisory on Evaluating Transportation Impacts in CEQA (Office of Planning and Research, December 2018)



- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas

## PROJECT LOCATION SCREENING

---

The OPR technical guidance discusses screening of residential and office projects based on location. Residential and office projects that locate in areas with low VMT, and that incorporate similar features will also tend to generate similarly low VMT. Maps showing areas of Mono County that exhibit “low” VMT characteristics can be used to screen residential and office projects from needing to prepare a CEQA VMT analysis.

The base year 2010 California Statewide Travel Demand Model (CSTDM) was utilized to estimate baseline VMT for Mono County. The steps taken using the CSTDM to estimate trip-based “work-related” and “residential-related” baseline VMT for Mono County was based on following two baseline averages: 1) Countywide (including Mammoth Lakes); and, 2) Countywide less Mammoth Lakes. These are described below.

Selection of which baseline average best reflects the degree of geographic screening allowed for development is left to the County’s discretion.

### Summation Steps

1. Using CSTDM output from: <https://dot.ca.gov/programs/transportation-planning/multi-modal-system-planning/statewide-modeling/sb-743-vmt-impact-assessment> tally the row sum (production zone) of daily VMT for home-based work (HBW), home-based shop (HBS) home-based other (HBO), home-based school (HBSC) trip purposes.
2. Calculate Home-based VMT per capita by TAZ as the row sum (production zone) of VMT divided by population of selected TAZs.





3. Using CSTDM output from: <https://dot.ca.gov/programs/transportation-planning/multi-modal-system-planning/statewide-modeling/sb-743-vmt-impact-assessment> tally the row sum (production zone) of daily VMT for the home-based work (HBW) trip purpose.
4. Calculate Home-based VMT per capita by TAZ as the row sum (attraction zone) of VMT divided by employees of selected TAZs.

The above steps were performed for two geographic areas: 1) Countywide (including the City of Mammoth Lakes); and, 2) Countywide less City of Mammoth Lakes.

### AVERAGE VMT RATES PER CAPITA

Average daily VMT rates per capita calculated for the two geographies and using the methodology described above are shown below in **Table 4**.

**TABLE 4. HOME-BASED VMT PER CAPITA – DAILY AVERAGE RATES BY GEOGRAPHY**

GEOGRAPHY	AVG. DAILY VMT/CAPITA
COUNTY WTH MAMMOTH LAKE LAKES	17.6
COUNTY WITHOUT MAMMATH LAKES	29.1

### AVERAGE VMT RATES PER EMPLOYEE

Average daily VMT rates per employee calculated for the three geographies and previously described methodology are shown provided in **Table 8**.

**TABLE 8. HOME-BASED WORK VMT PER EMPLOYEE- AVERAGE DAILY RATES BY GEOGRAPHY**

GEOGRAPHY	AVG. DAILY VMT/EMPLOYEE
COUNTY WTH MAMMOTH LAKE LAKES	9.73
COUNTY WITHOUT MAMMATH LAKES	11.95

Maps showing the VMT efficiency characteristics of each Block Group based on the Countywide with Mammoth Lakes VMT/capita and VMT/employee baseline averages is presented as **Figure 3**. Areas exhibiting VMT/capita or VMT/employee rates 85% of the county average are denoted as “green”. Residential or non-residential projects located in “green” zones would be screened from performing a VMT analysis. As shown, most areas (i.e., Block Groups) would not be screened out based on location. Proposed developments in these areas would be required to perform a VMT analysis with most likely resulting in a significant impact. Conversely, maps showing the VMT efficiency characteristics of each Block Group based on the Countywide less Mammoth Lakes are shown in **Figure 4** and **Figure 5**. As anticipated, greater opportunities for location-based screening (i.e., exhibit up to 85%) would be afforded to the County using the less Mammoth Lakes baseline average.



FIGURE 3 VEHICLE MILES TRAVELED PER CAPITA BY TAZ: COUNTYWIDE AVERAGE

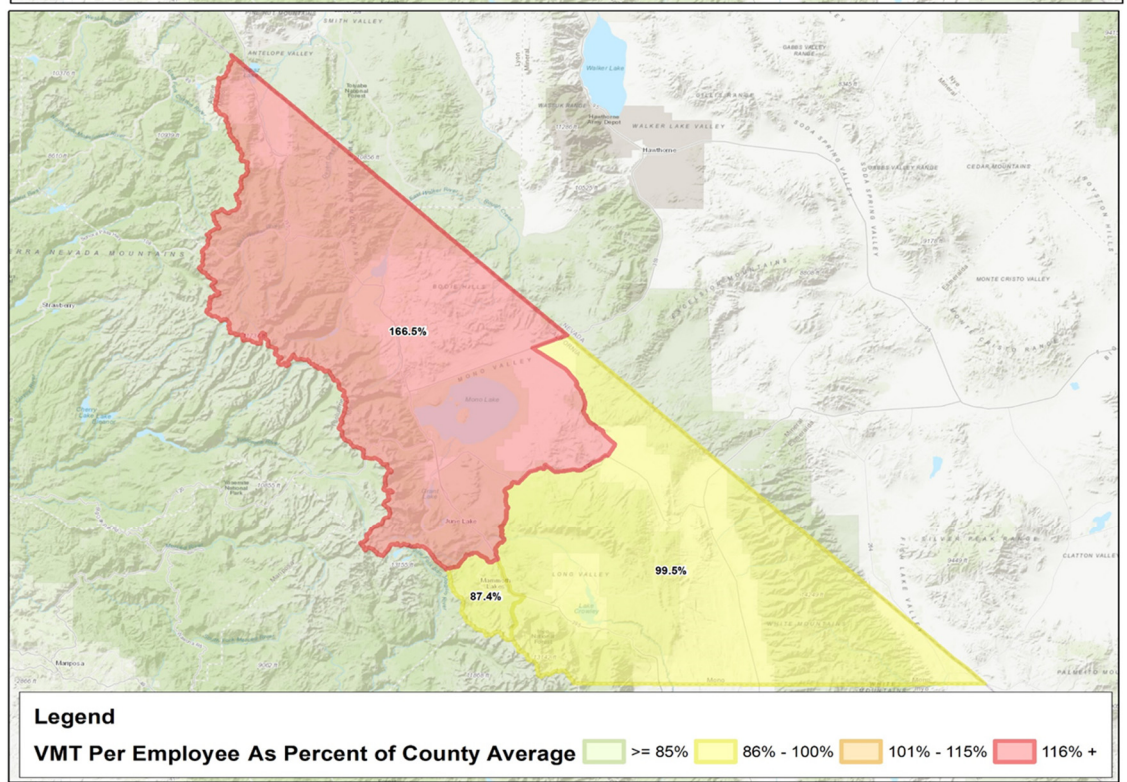
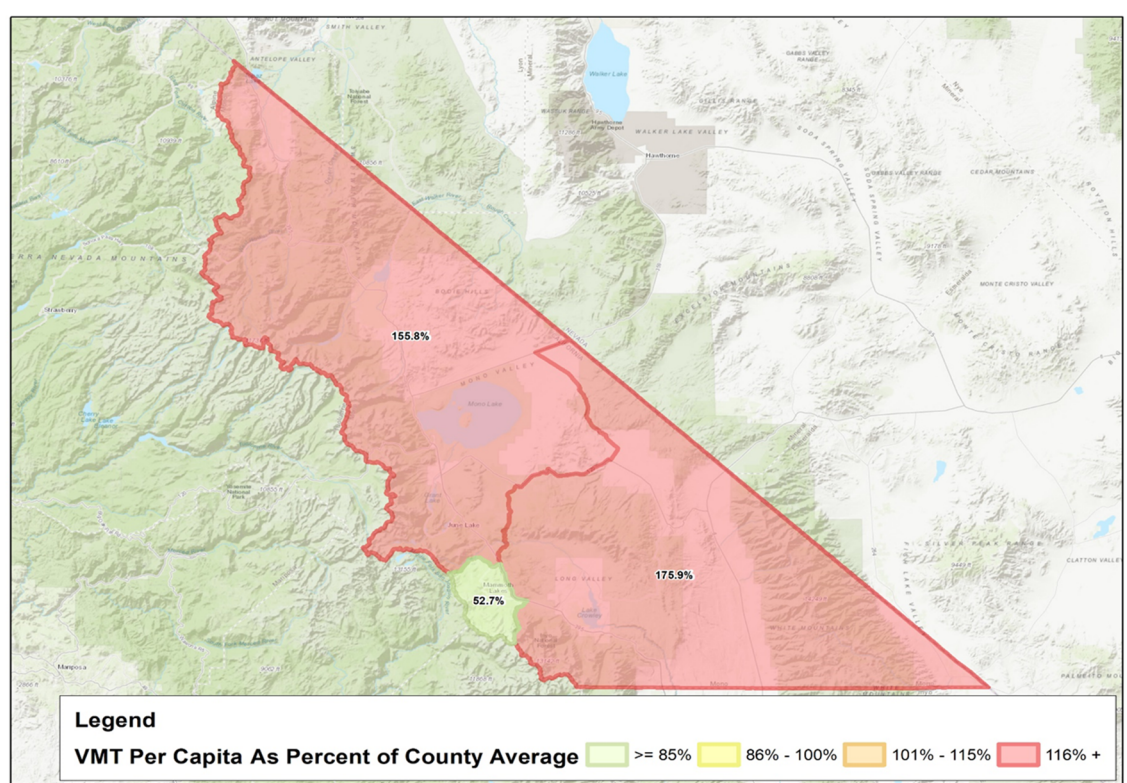
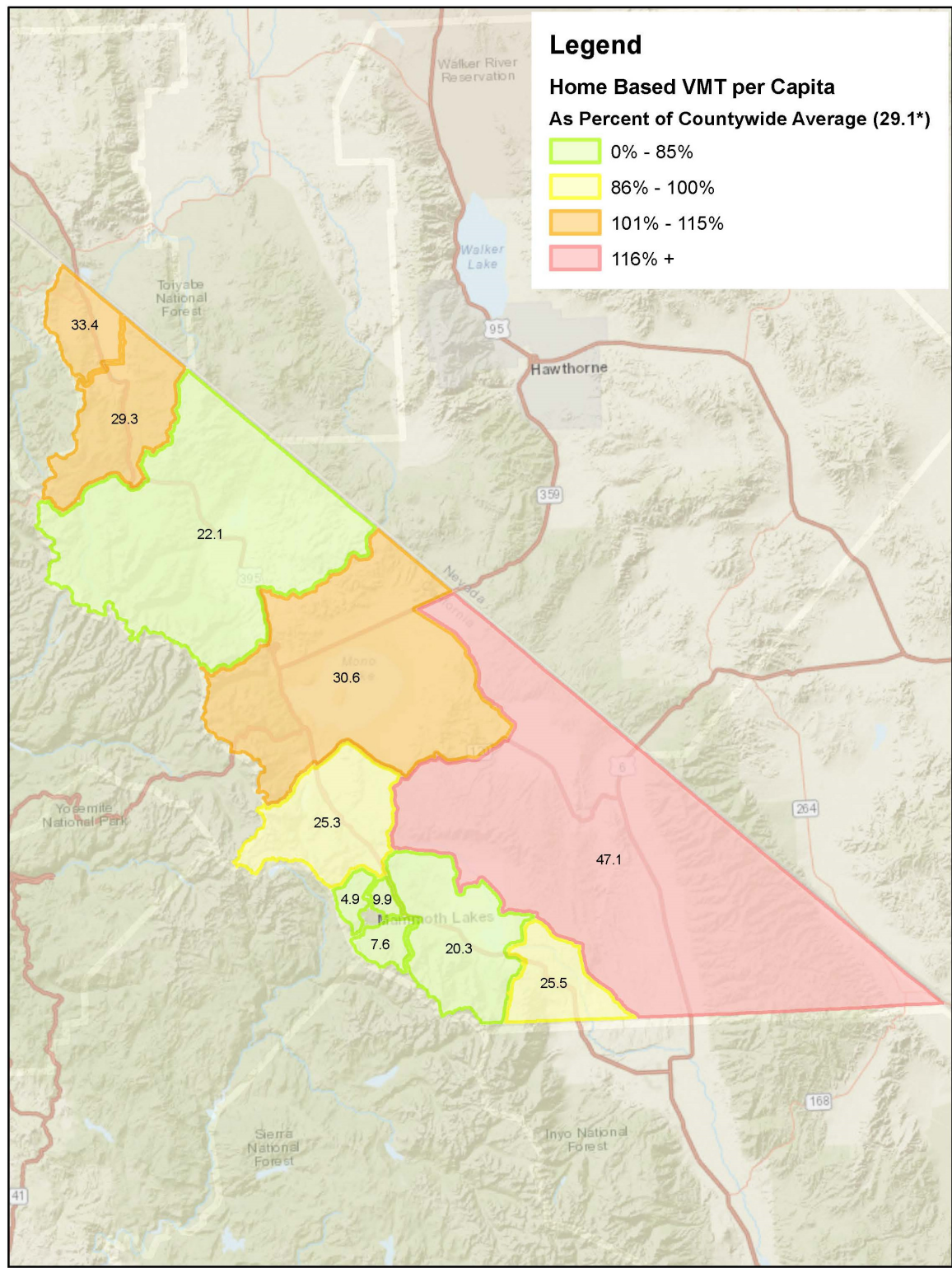




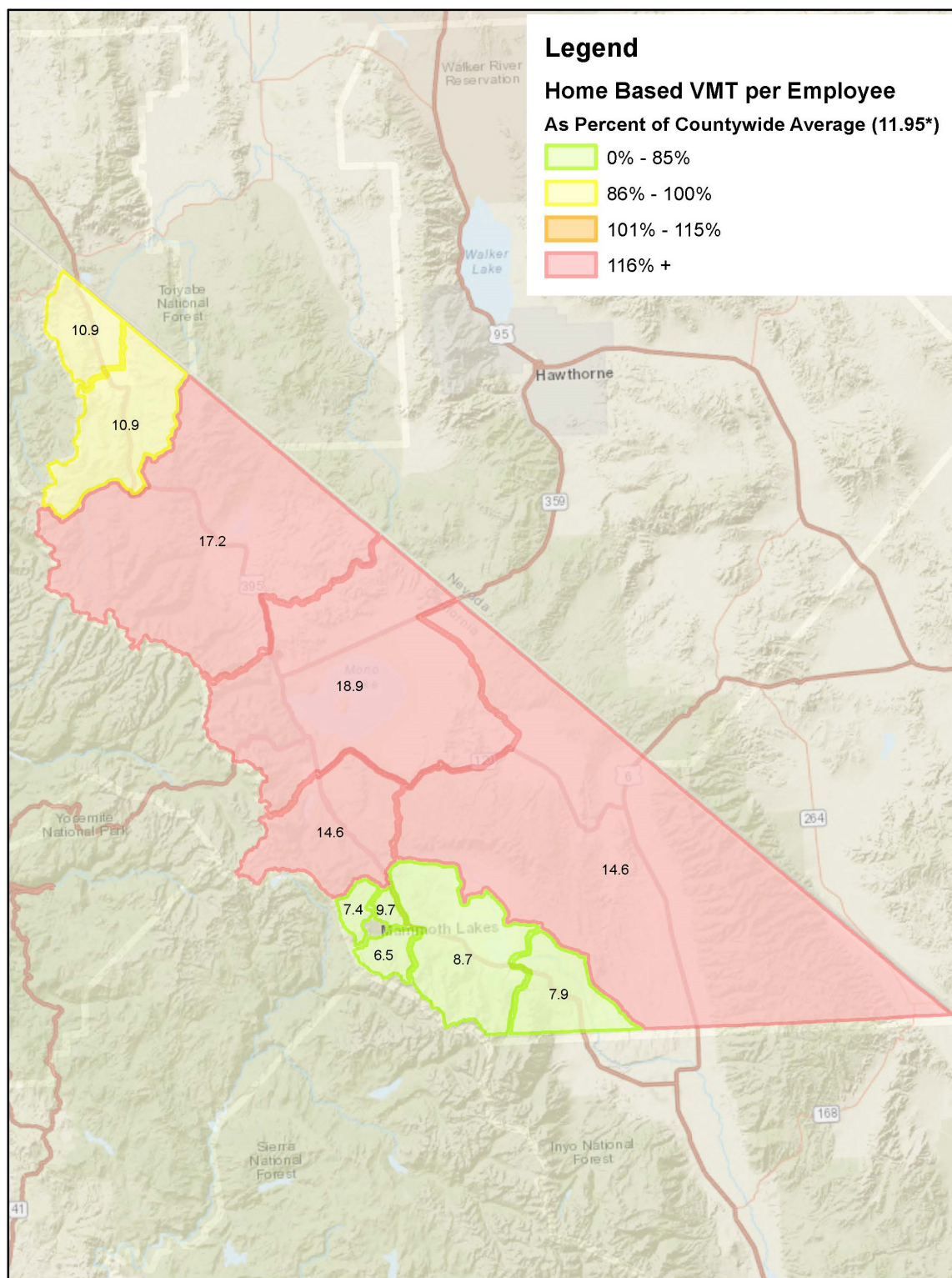
FIGURE 4 VEHICLE MILES TRAVELED PER CAPITA BY TAZ: COUNTYWIDE AVERAGE



Note \* Countywide Average Excludes CSTDM TAZ 3023 (Mammoth Lakes)



FIGURE 5 VEHICLE MILES TRAVELED PER EMPLOYEE BY TAZ: COUNTYWIDE AVERAGE



Note \* Countywide Average Excludes CSTDM TAZ 3023 (Mammoth Lakes)



**MONO COUNTY RECOMMENDED VMT THRESHOLDS AND SCREENING CRITERIA**

The recommended VMT screening criteria for Mono County are listed in **Table 9**. The City’s proposed VMT thresholds are listed in **Table 10**.

<b>Table 9 Screening Criteria for CEQA Transportation Analysis of Development Projects</b>	
<b>Category</b>	<b>Screening Criteria</b>
Located in a VMT Efficient Area (see green areas in Figures 4 and 5)	<ul style="list-style-type: none"> <li>Residential project located in an area where VMT/Capita is 15% or more below the base year <b>Countywide Average less Mammoth Lakes</b></li> <li>Office/Business and Industrial/Warehouse<sup>1</sup> projects located in an area where VMT/Employee is 15% or more below the base year <b>Countywide Average less Mammoth Lakes</b></li> <li>Industrial project located in an area VMT/Employee is at or below the base year <b>Countywide average less Mammoth Lakes</b><sup>1</sup></li> </ul>
Small Projects	<ul style="list-style-type: none"> <li>Generates less than 237 daily unadjusted trips ends</li> </ul>
Proximity to Transit	<ul style="list-style-type: none"> <li>Located within ½ a mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor<sup>2,3</sup></li> </ul>
Local-Serving Retail	<ul style="list-style-type: none"> <li>A qualifying local-serving retail use: &lt; 200,000 square feet</li> <li>A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>100% affordable units based on County criteria</li> </ul>
Mixed Use Project	<ul style="list-style-type: none"> <li>Project’s individual land uses should be compared to the screening criteria above (individually calculated).</li> </ul>
Change of Use or Redevelopment Project	<ul style="list-style-type: none"> <li>Proposed project’s total project VMT is less than the existing land use’s total VMT</li> </ul>
<p><sup>1</sup> Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.</p> <p><sup>2</sup> Situations where the project footprint is partially within the ½ buffer will be addressed by the County on case-by-case, project-by-project basis.</p> <p><sup>3</sup> Major transit stop means a rail transit station, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours”).</p>	



<b>Table 10</b>	
<b>VMT Thresholds of Significance for Development Projects</b>	
<b>Land Use Type</b>	<b>Threshold for Determination of a Significant VMT Impact<sup>1</sup></b>
Residential	15% below Baseline Countywide Average of VMT/Capita Less Mammoth Lakes VMT/Capita: 29.1 $\times$ .85 = <b>24.8 VMT/Capita</b>
Office/Business Professional Employment	15% below Baseline Countywide Average of VMT/Employee Less Mammoth Lakes VMT/Employee: 11.95 $\times$ .85 = <b>10.2 VMT/Emp</b>
Industrial/Warehouse/Manufacturing Employment <sup>2</sup>	VMT/Employee is at or below the base year countywide average less Mammoth Lakes = <b>11.95 VMT/Employee</b>
Regional Retail	No net increase in total Countywide VMT (net VMT change)
Regional Hotel/Motel	No net increase in total Countywide VMT (net VMT change)
Regional Recreational	No net increase in total Countywide VMT (net VMT change)
Regional Medical/Hospital	No net increase in total Countywide VMT (net VMT change)
Regional Public Facilities	Does not contain regional public uses
Mixed Use	Analyze each land use individually per above categories and evaluate independently
Redevelopment	Apply the relevant threshold based on proposed land use
Notes:	
<ol style="list-style-type: none"> <li>1. Projects that exceed these thresholds would have a significant impact under CEQA.</li> <li>2. Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.</li> </ol>	



## VMT ANALYSIS AND MITIGATION

### VMT ANALYSIS

Projects that don't meet any of the proposed screening criteria and are located in a non-efficient VMT screening area or those that would significantly alter existing or planned land uses will require project level VMT analysis. When a VMT analysis is required, projects may be analyzed by inputting the project land uses into a companion Mono County VMT Sketch Planning Tool developed as part of this study. The VMT Sketch Planning Tool is informed by over 50+ independent select zone analyses using the Kern COG travel demand model to determine the VMT behavior of land uses in remote areas within a predefined distance from the nearest developed area. The VMT Sketch Planning Tool is a resource to County staff to aid in this process.

### VMT MITIGATION

The California Air Pollution Control Officers Association (CAPCOA) and published the following two reports on the effectiveness of various VMT mitigation strategies:

- California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.
- California Air Pollution Control Officers Association. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Final Draft, December 2021.

**Table 11** summarizes the recommended measures and their documented range of effectiveness from the 2010 report. **Figure 6** shows the CAPCOA Transportation Strategies Organization chart.

Although the effect of multiple mitigation strategies is additive, CAPCOA establishes overall caps on maximum effectiveness when more than one mitigation strategy is applied. Consequently, for some very high VMT locations (greater than 125% shown as red on the VMT maps), project VMT impacts could potentially be unmitigable if located within suburban and/or greenfield settings.

### SAMPLE MITIGATION CALCULATIONS

**Table 12** provides generic/hypothetical examples of VMT mitigation calculations. As shown, two of the four example projects are not mitigatable with the candidate strategies and would result in a significant and unavoidable impact under CEQA. The examples illustrate the challenges of mitigating VMT at the project site level. This can have the intended effect for applicants to modify their projects by size, type or location to generate less VMT and align with state objectives for greenhouse gas reduction, land use efficiency, energy efficiency, and less overall reliance on the automobile.

Various sample calculations based on the 2010 CAPCOA guidance is provided in **Appendix A**.



While the impact findings are congruent between the two metrics (LOS and VMT), the real difference lies with the choice of mitigation for the development determined to have impacts. Whereas LOS impacts promote site-specific infrastructure treatments to reduce congestion, VMT impacts would focus on programmatic strategies that would reduce employee or resident VMT. These are described in more detail below.

### **MITIGATION FEE BANK PROGRAMS**

VMT mitigation banks or exchanges would provide an alternative to mitigating VMT impacts at the project site level. With a mitigation bank, developers would pay a fee in lieu of specific on-site mitigation measures. The combined fees would then be used to pay for mitigation projects across the county. With a mitigation exchange, developers would select from a pre-approved list of mitigation projects throughout the County.

Any such mitigation fee program or exchange would need to support its mitigation estimates with rigorous analysis and would be subject to the legal requirements of CEQA (i.e., CEQA mitigation monitoring requirements) and the California Mitigation Fee Act. As such, this option would not be a quick or easy undertaking. However, if the County finds over the first few years of adopting VMT thresholds that desirable projects are consistently difficult to mitigate, it may wish to pursue this option. This could be done in conjunction with the next general plan or transportation impact fee update.



**TABLE 11. 2010 CAPCOA MITIGATION STRATEGIES**

STRATEGY	DESCRIPTION	REPORTED RANGE OF EFFECTIVENESS	NOTES
<b>LAND USE MEASURES</b>			
<b>INCREASE DENSITY</b>	This measure involves increasing the density of the proposed project.	0.8-30%	Project density will be somewhat determined by zoning. Also, increased project densities may result in LOS or other adverse transportation or other environmental effects during local transportation analysis and/or CEQA analysis.
<b>INCREASE DIVERSITY OF URBAN AND SUBURBAN DEVELOPMENTS (MIXED USE)</b>	Involves including more than a single land use(s) in the proposed project.	9-30%	
<b>INTEGRATE AFFORDABLE AND BELOW MARKET RATE HOUSING</b>	While housing developments that are 100 percent affordable may be presumed less than significant, this method provides credit for partially affordable developments.	0.04-1.2%	Literature supports only a modest VMT reduction for partially affordable developments.
<b>IMPROVE DESIGN OF DEVELOPMENT (INCREASING NETWORK CONNECTIVITY)</b>	This measure is only appropriate for larger developments and should be implemented in conjunction with complete sidewalk coverage, pedestrian crossings, street trees and other design elements that support a pedestrian-oriented environment	3-21%	Based on intersections per square mile.
<b>NEIGHBORHOOD/SITE ENHANCEMENTS</b>			

**TABLE 11. 2010 CAPCOA MITIGATION STRATEGIES**

STRATEGY	DESCRIPTION	REPORTED RANGE OF EFFECTIVENESS	NOTES
<b>PEDESTRIAN NETWORK IMPROVEMENTS</b>	Provide a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site, minimize barriers to pedestrian access and interconnectivity, eliminate physical barriers such as walls, landscaping, and slopes that impede pedestrian circulation.	1-2%	Would need to develop set of standards for pedestrian connections that go "above and beyond" existing requirements.
<b>PROVIDE TRAFFIC CALMING MEASURES</b>	Project design will include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements.	0.25-1%	Depends on percent of project intersections and streets where improvements are provided.
<b>PROVIDE BIKE PARKING IN NON-RESIDENTIAL PROJECTS</b>	A non-residential project will provide short-term and long-term bicycle parking facilities to meet peak season maximum demand.	0.63%	Not recommended as a stand-alone strategy in the CAPCOA report but other literature cites a modest 0.625% reduction.
<b>PARKING POLICY/PRICING</b>			
<b>LIMIT PARKING SUPPLY</b>	The project will change parking requirements and types of supply within the project site to encourage "smart growth" development and alternative transportation choices by project residents and employees.	5-12.5%	May conflict with existing parking requirements.
<b>UNBUNDLE PARKING COSTS</b>	This project will unbundle parking costs from property costs. Unbundling separates parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost.	2.6-13%	Unbundle costs for parking from building rent. Mono County market may not support this measure.

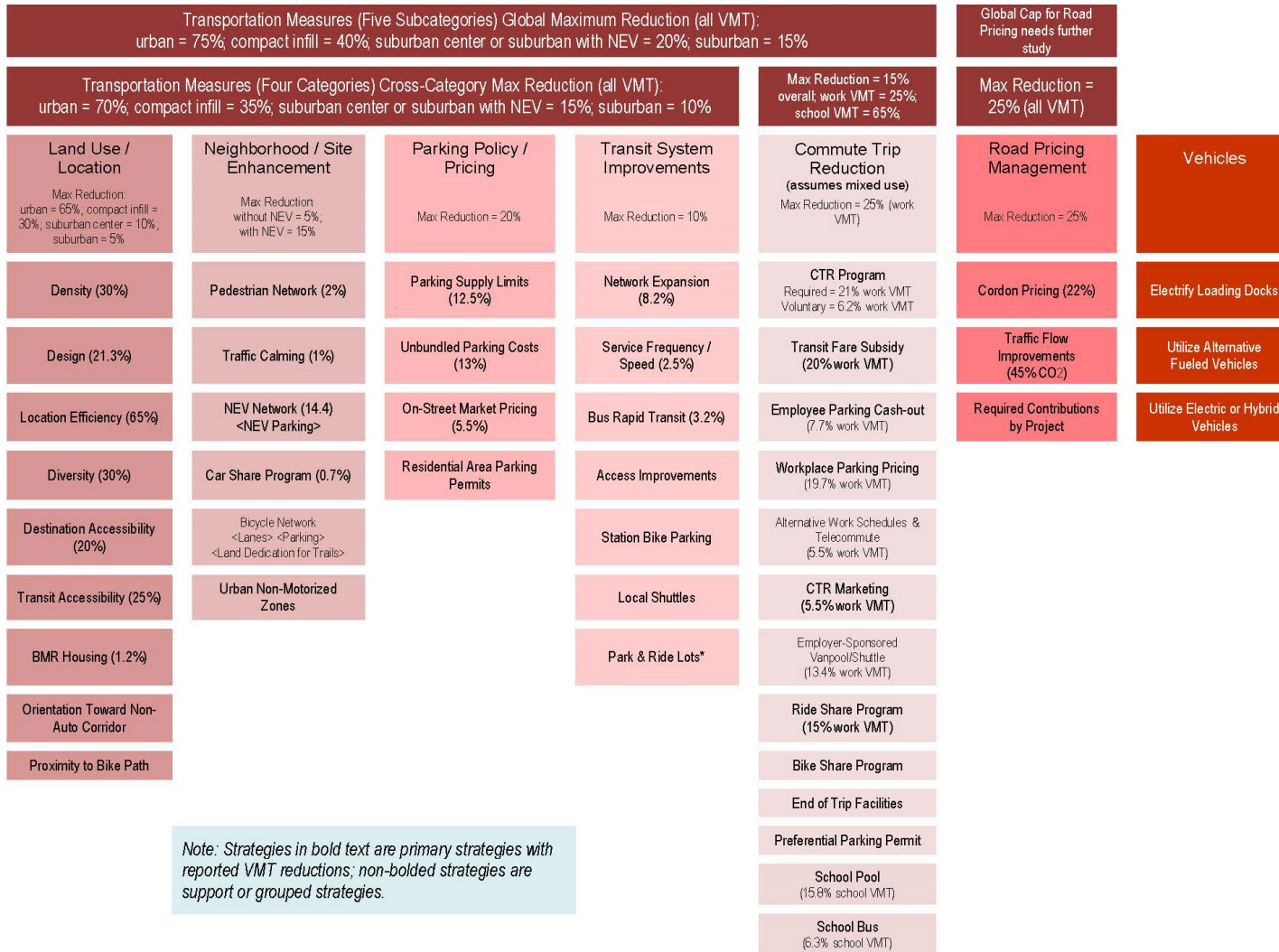
**TABLE 11. 2010 CAPCOA MITIGATION STRATEGIES**

STRATEGY	DESCRIPTION	REPORTED RANGE OF EFFECTIVENESS	NOTES
<b>VOLUNTARY PARTICIPATION IN COMMUTE TRIP REDUCTION PROGRAM</b>	Sites participating in a commute trip reduction program apply strategies such as preferential carpool parking and subsidized transit passes.	1-6.2%	

Source: California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.



**FIGURE 6. CAPCOA – TRANSPORTATION STRATEGIES ORGANIZATION**



California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.



**TABLE 12. SAMPLE MITIGATION CALCULATIONS (BASELINE METRIC AND THEREHSOLD VALUES ARE HYPOTHETICAL)**

<b>PROJECT (SEE BELOW FOR DESCRIPTION):</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>BASELINE VMT PER UNIT (HYPOTHETICAL)</b>	44.5	86.9	71.8	47.7
<b>THRESHOLD (HYPOTHETICAL)</b>	44.0	64.8	61.6	44.0
<b>VMT REDUCTIONS (PERCENT):</b>				
<b>INCORPORATE AFFORDABLE HOUSING</b>				0.083
<b>IMPROVE NEIGHBORHOOD CONNECTIVITY</b>			0.013	
<b>PEDESTRIAN NETWORK IMPROVEMENTS</b>	0.020	0.006	0.020	
<b>PROVIDE TRAFFIC CALMING MEASURES</b>			0.008	0.010
<b>PROVIDE BIKE PARKING</b>		0.006		
<b>UNBUNDLED PARKING COSTS<sup>1</sup></b>		0.136		
<b>VOLUNTARY TRIP REDUCTION PROGRAM<sup>2</sup></b>		0.054		
<b>TOTAL VMT REDUCTION<sup>3</sup></b>	<b>0.02</b>	<b>0.20 (0.15)</b>	<b>0.04</b>	<b>0.09</b>
<b>VMT AFTER MITIGATION</b>	43.61	69.30	68.87	43.26
<b>MITIGATED IMPACT?</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>Yes</b>

Projects: A) Multifamily Residential; B) Office Building, C) 100 Unit Single Family Residential Project; D) 200 Unit Apartment Complex

Notes:

- a) Assumes \$200 monthly parking charge and \$6,000 annual ownership cost
- b) Assumes suburban center effectiveness rate and 100% eligibility
- c) CAPCOA report recommends capping total reductions at 15% for suburban locations



## REFERENCES

Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.

California Air Pollution Control Officers Association. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Final Draft, December 2021.

California Department of Transportation. Vehicle Miles Traveled-Focused Transportation Impact Study Guide, May 2020.

California Department of Transportation. Transportation Analysis under CEQA. First Edition, September 2020.

California Department of Transportation. Transportation Analysis Framework. First Edition, September 2020.



**APPENDIX A**

**VMT MITIGATION CALCULATION METHODS**

**QUANTIFYING GREENHOUSE GAS MITIGATION**

**MEASURES, 2010 CAPCOA**



This appendix presents calculation methods for the VMT mitigation strategies proposed for use in Mono County. The calculation methods may be implanted in standardized spreadsheet templates.

## LAND USE MEASURES

---

### INCREASE DENSITY

Inputs: Number of housing units or jobs per acre for development site

Calculation: Percent VMT reduction (capped at 30 percent) = A\*B

where A is the percent increase in jobs or housing units per acre for the site and B is the elasticity of VMT with respect to density.

A is calculated as

(Housing units per acre-7.6)/7.6 or

(Jobs per acre-20/20)

The CAPCOA report recommends that A be capped at 500 percent and the overall VMT reduction be capped at 30 percent. The factor for B recommended by CAPCOA is 0.07.

### INCREASE DIVERSITY (ADD MIXED USE TO PROJECT)

Inputs: Percentage of each land use type in the project (building floor area)

Calculation: Percent VMT reduction = Land Use Change \* B where:

$$\text{Land Use Index (LUI)} = \frac{-a}{\ln(6)}$$

$$a = \sum_{i=1}^6 a_i \ln(a_i)$$

$$\text{Land Use Change} = \frac{\text{LUI} - 0.15}{0.15}$$

$a_i$  = building floor area of land use/total square feet of area considered

$a_1$  = single family residential

$a_2$  = multifamily residential





$a_3$  = commercial

$a_4$  = industrial

$a_5$  = institutional

$a_6$  = park

If land use is not present, set  $a_i$  equal to 0.01

B is the elasticity of VMT with respect to land use index (LUI) and 0.09 is the recommended value.

Note that the OPR guidance recommends analyzing the residential and employment land uses of a mixed-use project separately. However, this method could be applied to reduce the VMT of each use in cases where mitigation is required.

### **INTEGRATE AFFORDABLE HOUSING**

While housing developments that are 100 percent affordable may be presumed less than significant with respect to VMT, this method provides credit for partially affordable developments.

Inputs: Percent of residential units that are deed-restricted for extremely low income (ELI), very low income (VLI), and low-income households (LI).

Method: Percent VMT Reduction = (Percent ELI Units) (32.5) + (%VLI Units)(25.2) + (% LI Units)(10.2)

### **IMPROVE DESIGN OF DEVELOPMENT (INCREASE NETWORK CONNECTIVITY)**

Inputs: Number of intersections per square mile

Method: Percent VMT Reduction = Intersections \*B

Where Intersections = Percent increase in intersections versus a typical suburban development

$$= (\text{Project Intersections per Square Mile} - 36) / 36$$

B=elasticity of VMT with respect to intersections (0.12 is recommended value from literature).

This measure is only appropriate for larger developments and should be implemented in conjunction with complete sidewalk coverage, pedestrian crossings, street trees and other design elements that support a pedestrian-oriented environment. Note that the value of the Intersections factor should be capped at 500 percent.



**NEIGHBORHOOD AND SITE ENHANCEMENTS**

**PEDESTRIAN NETWORK IMPROVEMENTS**

Inputs: Information about pedestrian access and connectivity within the project site and connecting to off-site destinations.

Method: The VMT reduction is applied according to the table below.

ESTIMATED VMT REDUCTION	EXTENT OF PEDESTRIAN ACCOMMODATIONS	CONTEXT
2%	Within Project Site and Connecting Off-Site	Urban/Suburban
1%	Within Project Site	Urban/Suburban
<1%	Within Project Site and Connecting Off-Site	Rural

Source: California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.

**PROVIDE TRAFFIC CALMING MEASURES**

This measure is applicable for larger developments and where improvements extend beyond the project frontage.

Inputs: Percent of streets and intersections within project site with traffic calming improvements.

Method: The VMT reduction is applied according to the table below.

	% STREETS WITH IMPROVEMENTS				
	25%	50%	75%	100%	
	<u>PERCENT VMT REDUCTION</u>				
% INTERSECTIONS WITH IMPROVEMENTS	25%	0.25%	0.25%	0.5%	0.5%
	50%	0.25%	0.5%	0.5%	0.75%
	75%	0.5%	0.5%	0.75%	0.75%
	100%	0.5%	0.75%	0.75%	1%

Source: California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.



## PROVIDE BIKE PARKING IN NON-RESIDENTIAL PROJECTS

This strategy has minimal impact as a stand-alone measure and should be implemented in conjunction with enhanced street network characteristics and bicycle facilities.

Inputs: Information on short term and long terms bicycle parking facilities sized to meet peak maximum demand.

Method: VMT is reduced by 0.625%.

## PARKING PRICING AND POLICY

---

### LIMIT PARKING SUPPLY

This mitigation strategy involves providing less parking than required by the Institute of Transportation Engineers (ITE) Parking Generation Manual. This strategy may conflict with municipal code parking requirements.

Inputs: ITE parking generate rate for project site and actual parking provision rate for project site.

Method:  $Pct\ VMT\ Reduction = \frac{(Actual\ Parking\ Provision - ITE\ Parking\ Generation\ Rate)}{ITE\ Parking\ Generation\ Rate} * 0.5$

### UNBUNDLE PARKING COSTS FROM PROPERTY COST

This strategy involves charging for parking on a separate basis from other property costs. For example, apartment or office rent would be separate from parking space rental. This strategy would involve ongoing monitoring to make sure it continues to be enforced.

Inputs: Monthly parking cost for project site.

Method: Percent VMT Reduction = Change in vehicle ownership cost \* elasticity \* A

Where

elasticity of vehicle ownership with respect to total vehicle costs = -0.4

Change in vehicle ownership cost = Monthly parking cost\*12/annual vehicle ownership cost

A = 85% (adjustment from vehicle ownership to VMT)

## COMMUTE TRIP REDUCTION PROGRAMS

---

This VMT mitigation strategy would expand participation in this TDM program to all sites requiring VMT mitigation. The research cited for this strategy assumes that the TDM program will include



carpooling, ride matching, preferential carpool parking, flexible work schedules for carpools, a half-time transportation coordinator, vanpool assistance, bicycle parking, showers, and locker facilities.

Inputs: Percentage of employees eligible for program and location of project site (low density suburb, suburban center, or urban location).

Method:

Percent VMT Reduction = Percent reduction in commute VMT \* Percent employees eligible

Where percent reduction in commute VMT is 5.2% (low density suburb), 5.4% (suburban center), or 6.2% (urban).



## **ADDENDUM TO THE GENERAL PLAN EIR FOR MONO COUNTY 2022 RESOURCE EFFICIENCY PLAN UPDATE AND VEHICLE MILES TRAVELED THRESHOLDS**

### **LEAD AGENCY:**

Mono County Community Development Department, Planning Division

PO Box 347

1290 Tavern Rd, Suite 138

Mammoth Lakes, CA 93546

**June 2022**

### **INTRODUCTION**

This addendum to the Mono County General Plan EIR applies to the 2022 Mono County Resource Efficiency Plan update (2022 REP update) and Mono County vehicle miles traveled (VMT) thresholds and screening criteria. The REP identifies sources of greenhouse gas (GHG) emissions occurring in the unincorporated county and includes policies and programs that reduce emissions within the County's jurisdictional or operational control. The VMT thresholds and screening criteria were prepared consistent with the Governor's Office of Planning and Research (OPR's) Technical Advisory and to reflect the context for Mono County.

The General Plan EIR was certified by the Mono County Board of Supervisors on December 8, 2015. CEQA Guidelines Section 15164 states that the lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. This document outlines the elements of the amendment, the relevant CEQA provisions, and the potential environmental impacts.

### **BACKGROUND**

#### ***2022 REP Update***

In 2014, Mono County prepared a Resource Efficiency Plan (REP), which was incorporated into the County General Plan. County staff identified 120 actions in the 2014 REP that were relevant to the rural and mountainous nature of the county and considered politically, technically, and economically feasible to implement. The policies include implementing net-zero energy policies for County facilities, replacing and consolidating vehicles in the County fleet, and strategic opportunities to improve resource efficiency by residents, businesses, and visitors. These policies were adopted by the County and incorporated into the General Plan.

After adoption of the 2014 REP, the State of California adopted additional legislation to reduce GHG emissions, such as Executive Order (EO) S-3-05 that established a goal of cutting emissions by 80 percent of 1990 levels by 2050 and SB 100 that established a requirement that 100% of all electricity in California must be obtained from renewable and zero-carbon energy resources by 2045. The 2022 REP Update was prepared to meet the standards in the California Air Resources Board (CARB) 2017 Climate Change Scoping Plan (CARB 2017). The 2022 REP update also includes GHG streamlining checklists to streamline future CEQA analysis of GHG impacts for private and County development projects by evaluating project consistency with the 2022 REP.

### ***Vehicle Miles Traveled***

Senate Bill (SB) 743 updated the way transportation impacts are measured in California for new development projects. In accordance with SB 743 and the resulting changes to the CEQA Guidelines, local agencies may no longer use measures of vehicle delay such as Level of Service (LOS) to quantify transportation impacts on the environment. While agencies may continue to maintain LOS standards and similar measures as a matter of local policy and for project analysis, vehicle miles traveled (VMT) has been codified in the CEQA Guidelines as the most appropriate measure for measuring transportation impacts under CEQA. This change applied statewide as of July 1, 2020. The change from LOS to VMT for CEQA purposes requires the County to revise its process and guidelines, which now must address VMT thresholds of significance, screening, and mitigation procedures. The Governor's Office of Planning and Research (OPR) prepared guidelines for the implementation of SB 743 for environmental clearance of discretionary land use and infrastructure projects under CEQA. While OPR's Technical Advisory provides recommendations on many aspects of conducting a CEQA transportation analysis using VMT, OPR's guidance is not comprehensive, and some key decisions are left for lead agencies to determine.

## **PROJECT DESCRIPTION**

### ***2022 REP Update***

The 2022 REP updates the baseline GHG inventories for both County government operations and for the community at-large for calendar year 2019. The 2022 REP also sets new GHG reduction targets consistent with the 2017 CARB Scoping Plan based on updated inventories and forecasts for the County and recent statewide policies and mandates. The REP update also includes new GHG streamlining checklists for private and County development projects to evaluate project consistency with the goals, objectives and policies included in both the REP and General Plan for the purpose of reducing GHG emissions. Because the 2022 REP update incorporates the goals, objectives, and policies contained in the adopted Mono County General Plan, the 2022 REP update does not result in any change to the General Plan.

### ***Vehicle Miles Traveled***

Screening procedures play an important part in streamlining VMT project impact analysis. Consistent with OPR guidance, projects may be presumed to have less than significant VMT impacts due to size, proximity to high quality transit, and housing affordability. Second, projects may be screened according to location. Projects located in areas that have been shown to generate VMT below the selected threshold of significance may be presumed to have less than significant impacts and no further analysis required. The recommended VMT screening criteria are summarized in **Table 1** below.

To develop Mono County's VMT thresholds two primary data and modeling resources were applied: 1) the California Statewide Travel Demand Model (CSTDM); and 2) the Longitudinal Employment and Household Dynamic (LEHD) journey to work data.

In order to reflect the trip length characteristics of the unincorporated county only, VMT metrics were assessed at the countywide level less Town of Mammoth Lakes. Both per capita and per employee VMT baseline

averages were developed. These baseline average VMT estimates will be the measuring stick that all future projects will be compared against. In addition, a net VMT change resulting from retail development was also performed using ArcGIS Network Analysis Tool. The resulting VMT thresholds are summarized in **Table 2** below.

Projects that don't meet any of the proposed screening criteria and are located in a non-efficient VMT screening area or those that would significantly alter existing or planned land uses would require project level VMT analysis. In addition, the County reserves the authority to require a VMT analysis for discretionary land use projects that fall below the proposed project size screen if the project's VMT characteristics warrant concern. When a VMT analysis is required, projects may be analyzed by inputting the project land uses into a Mono County VMT Sketch Planning Tool.

**Table 1. Screening Criteria for CEQA Transportation Analysis of Development Projects**

Category	Screening Criteria
Located in a VMT Efficient Area	<ul style="list-style-type: none"> <li>• Residential project located in an area where VMT/Capita is 15% or more below the base year <b>Countywide Average less Mammoth Lakes</b></li> <li>• Office/Business and Industrial/Warehouse<sup>1</sup> projects located in an area where VMT/Employee is 15% or more below the base year <b>Countywide Average less Mammoth Lakes</b></li> <li>• Industrial project located in an area VMT/Employee is at or below the base year <b>Countywide average less Mammoth Lakes</b><sup>1</sup></li> </ul>
Small Projects	<ul style="list-style-type: none"> <li>• Generates less than 237 daily unadjusted trips ends<sup>2</sup></li> </ul>
Proximity to Transit	<ul style="list-style-type: none"> <li>• Located within ½ a mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor<sup>3,4</sup></li> </ul>
Local-Serving Retail	<ul style="list-style-type: none"> <li>• A qualifying local-serving retail use: &lt; 200,000 square feet</li> <li>• A retail project may also be defined as local-serving if a market study demonstrates that it is based on the size of its market area.</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>• 100% affordable units based on County criteria</li> </ul>
Mixed Use Project	<ul style="list-style-type: none"> <li>• Project's individual land uses should be compared to the screening criteria above (individually calculated).</li> </ul>
Change of Use or Redevelopment Project	<ul style="list-style-type: none"> <li>• Proposed project's total project VMT is less than the existing land use's total VMT</li> </ul>

<sup>1</sup> Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.

<sup>2</sup> OPR advises that projects generating fewer than 110 trips per day could be presumed to have less than significant VMT impacts. However, given that rural context of Mono County, the small project screen daily trip generation is recommended to be 237 daily trips. This is consistent with the Project Size VMT screens in practice as adopted by Sacramento County and other jurisdictions in the Sacramento Region.

<sup>3</sup> Situations where the project footprint is partially within the ½ buffer will be addressed by the County on case-by-case, project-by-project basis.

<sup>4</sup> Major transit stop means a rail transit station, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours").

**Table 2. VMT Thresholds of Significance for Development Projects**

<b>Land Use Type</b>	<b>Threshold for Determination of a Significant VMT Impact<sup>1</sup></b>
Residential	15% below Baseline Countywide Average of VMT/Capita Less Mammoth Lakes VMT/Capita: 29.1 .85 = <b>24.8 VMT/Capita</b>
Office/Business Professional Employment	15% below Baseline Countywide Average of VMT/Employee Less Mammoth Lakes VMT/Employee: 11.95 x .85 = <b>10.2 VMT/Emp</b>
Industrial/Warehouse/Manufacturing Employment <sup>2</sup>	VMT/Employee is at or below the base year countywide average less Mammoth Lakes = <b>11.95 VMT/Employee</b>
Regional Retail	No net increase in total Countywide VMT (net VMT change)
Regional Hotel/Motel	No net increase in total Countywide VMT (net VMT change)
Regional Recreational	No net increase in total Countywide VMT (net VMT change)
Regional Medical/Hospital	No net increase in total Countywide VMT (net VMT change)
Regional Public Facilities	Does not contain regional public uses
Mixed Use	Analyze each land use individually per above categories and evaluate independently
Redevelopment	Apply the relevant threshold based on proposed land use
Notes:	
1. Projects that exceed these thresholds would have a significant impact under CEQA.	
2. Heavy-duty truck VMT would not be counted against Industrial/Warehouse projects, only employee-oriented commuter VMT.	

## **CEQA PROVISIONS FOR PREPARING AN ADDENDUM TO AN EIR**

The California Environmental Quality Act (CEQA §15164[b]) states:

*“(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.”*

In turn, §15162 states that preparation of a subsequent EIR is required where one or more of the following occurs:

*“(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:*

*(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

*(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

*(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:*



*(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

*(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

*(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

*(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

*(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation."*

## ANALYSIS OF POTENTIALLY SIGNIFICANT IMPACTS

The following table summarizes the existing impacts of the General Plan and any potential additional impacts from adoption of the 2022 REP update and VMT thresholds and screening criteria:

<b>Table 10: Summary of General Plan Impacts and Mitigation Measures</b>				
<b>ENVIRONMENTAL IMPACT</b>	<b>LEVEL OF SIGNIFICANCE WITHOUT MITIGATION</b>	<b>MITIGATION MEASURES</b>	<b>RESULTING LEVEL OF SIGNIFICANCE</b>	<b>ADDITIONAL IMPACTS FROM REP UPDATE AND VMT THRESHOLDS</b>
<b>§4.1 LAND USE AND PLANNING</b>				
4.1(a) Physically divide an established community	Less than Significant	Mitigated to the greatest feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	Less than Significant	None. Neither the REP update nor the VMT thresholds would alter lot lines, boundaries, zoning or land use designations.
4.1(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.	Less than Significant	Mitigated to the greatest feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	Less than Significant	None. Neither the REP update nor the VMT thresholds would conflict with local area plans and policies. Neither the REP nor VMT thresholds change any policies in the General Plan.
<b>§4.2 REGIONAL TRANSPORTATION PLAN AND CIRCULATION</b>				
4.2(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation and all relevant components of the circulation system.	Less than Significant	Mitigated to the feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	Less than Significant	None. The 2022 REP update contains the same policies, actions, and reduction targets as the 2014 REP that was incorporated into the County's General Plan. The REP update would not result in

				transportation related impacts. The VMT thresholds and screening criteria provide clarity on the approach to evaluating project effects from VMT and are consistent with statewide goals and standards. The VMT thresholds would not conflict with any plan policy or ordinance.
4.2(b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures.	Less than Significant	Mitigated to the feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	Less than Significant	None. The REP update focuses on the reduction of vehicle miles travelled (VMT) instead of level of service (LOS) as VMT is a better predictor of GHG emissions. The VMT thresholds align with current statewide policy for VMT and would not create a conflict.
4.2(c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	No Impact	Mitigated to the feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	No Impact	None. Neither the REP update nor VMT thresholds contain policies or actions that would affect air travel.
4.2(d) Result in inadequate emergency access or design hazards.	Less than Significant	Mitigated to the feasible extent through 2015 RTP/General Plan Policies and Actions. No supplemental mitigation measures are recommended.	Less than Significant	None. Neither the REP update nor VMT thresholds include measures that would affect emergency access or design.

4.2(e) Conflict with adopted policies, plans, or programs for public transit, bicycle, parking/pedestrian facilities, or decrease safety or performance of such facilities.	No Impact	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	No Impact	None. The 2022 REP update contains the same policies and actions as the County's General Plan. The REP update would not affect plans, policies, or programs for public transit. The VMT thresholds would not affect any plans, policies, or programs for public transit. The VMT thresholds and screening criteria include screening criteria for proximity to public transit consistent with SB 743.
<b>§4.3 AIR QUALITY, CLIMATE CHANGE, GHG EMISSIONS</b>				
4.3(a) Conflicts with or obstructs implementation of the air quality plan or results in a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. Neither the REP update nor the VMT thresholds include policies or actions that would affect any air quality plan or cause a net increase of criteria pollutants.
4.3(b) Violates an air quality standard or contributes substantially to an existing or projected air quality violation.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. The REP update is consistent with the state climate directives and demonstrate that the strategies in the plan will meet the long-term statewide goal for reduction of GHGs. Implementation of policies and programs in the REP update

				would not violate air quality standards. The VMT thresholds were established consistent with State guidance and would not contribute to an air quality violation.
4.3© Exposes sensitive receptors to substantial pollutant concentrations.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. The REP update contains General Plan policies and actions that aim to reduce exposure to sensitive receptors. The REP update does not change any policies or actions from the previously approved REP and therefore has no effect on pollutant concentrations. The VMT thresholds would not result in substantial pollutant concentrations.
4.3(d) Creates objectionable odors affecting a substantial number of people.	Less than Significant	Impacts reduced through 2015 RTP/General Plan Policies and Actions.	Less than Significant	None. Implementation of the REP update and VMT thresholds would not change any policies and would not create odors.
4.3(e) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. The REP update contains the same policies, actions, and reduction targets as the County's General Plan. No additional GHG emissions would be generated from the

				implementation of the REP update. The VMT thresholds are consistent with State policy and guidance and would not generate any GHG emissions.
<b>§4.4 BIOLOGICAL RESOURCES</b>				
4.4(a) Have a substantial adverse effect, directly or through habitat modifications, on a candidate, sensitive, or special status species as identified in local or regional plans, policies, regulations, or by CDFW or USFWS?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. Neither the REP update nor the VMT threshold include policies and actions that would directly or indirectly affect biological resources. Both the REP update VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and would not affect biological resources.
4.4(b) Have a substantial adverse effect on a riparian habitat or sensitive natural plant community identified in local/ regional policies, regulations, by CDFW or USFWS?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.4(c) Have a substantial adverse effect on federally protected wetlands as per Clean Water Act §404 (marsh, vernal pool, coastal, etc.) through removal, filling, hydrological interruption, other means?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.4(d) Interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede use of native wildlife nurseries?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.4(e) Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.4(f) Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan?	No Impact	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	No Impact	
<b>§4.5. GEOLOGY, SOILS, MINERALS</b>				
4.5(a) Expose people or structures to potential substantial adverse effects involving: i) Rupture of a known Alquist-Priolo earthquake fault as delineated by the State Geologist or based on other substantial evidence? ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. Neither the REP update nor the VMT thresholds include policies and actions that would directly or indirectly affect

4.5(b) Result in substantial soil erosion or the loss of topsoil?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	geology, soils, or minerals. Both the REP update VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and do not affect CEQA analysis of geology, soils, or mineral resources.
4.5(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, or be located on expansive soil creating substantial risks to life or property?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.5(d) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
4.5(e) Result in the loss of availability of a known mineral resource or an identified locally important mineral resource that would be of value to the region and to residents of the state of California?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
<b>§4.5. PUBLIC HEALTH &amp; SAFETY, HAZARDS, HAZARDOUS MATERIALS</b>				
4.6(a) Create a hazard to the public or environment through routine transport, use or disposal of hazardous materials, or release of hazardous materials into the environment, including within 1/4 mile of a school?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. Neither the REP update nor the VMT thresholds include policies and actions that would directly or indirectly affect public health & safety, hazards, and hazardous materials. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and would not result in impacts to health & safety, hazards, and hazardous materials.
4.6(b) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to CGC §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.6(c) Create a safety hazard for people residing or working in an area located in an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport or private airstrip?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.6(d) Impair implementation of or physically interfere with an adopted emergency response or evacuation plan?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.6(e) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	

where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
4.6(f) Expose people or structures to significant risk of avalanche, landslides, destructive storms or winds, rockfall or volcanic activity?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
<b>§4.7. CULTURAL RESOURCES</b>				
4.7(a) Cause a substantial adverse change in the significance of a prehistorical or historical resource?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. Neither the REP update nor the VMT thresholds include policies and actions that would directly or indirectly affect cultural resources. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and would not result in impacts to cultural resources.
4.7(b) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.7(c) Disturb any human remains or sacred lands, including those interred outside of formal cemeteries?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
<b>§4.8. HYDROLOGY, FLOODING, WATER QUALITY, WATER SUPPLY</b>				
4.8(a) Violate any water quality standards?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. The REP update incorporates General Plan goals, objectives, and actions applicable hydrology, water quality and water supply in the County. Policies and actions supporting Goal CO.6 include encouraging new buildings to exceed the water efficiency standards in the California Building Standards Code, promoting
4.8(b) Violate wastewater treatment or discharge requirements or require new wastewater treatment facilities?	Potentially Significant	Impacts reduced through 2015 RTP/General Plan Policies and Actions. Supplemental recommended mitigation includes:  <i>1. It is recommended that the County formalize policies consistent with LRWQCB recommendations for controlling the problems associated with septic systems including (a) reevaluate and update the adequacy of existing local regulations for installation and maintenance of septic</i>	Significant and Unavoidable	



		<i>systems, including applicable criteria from Basin Plan Appendix C; (b) continue to limit the use of septic systems on small-lot, higher density developments; (c) encourage alternative waste treatment systems; (d) encourage &amp; support funding for wastewater treatment plants in outlying areas where water quality problems and/or population density require wastewater collection and treatment.</i>		development solutions and practices that preserve water quality, encouraging water efficiency retrofits in existing homes and businesses, and promoting more efficient wastewater treatment. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and do not establish any new policies or goals. The REP update and VMT thresholds would not result in impacts on hydrology, flooding, water quality and water supply.
4.8(c) Have insufficient groundwater or surface water supplies to sustainably serve General Plan land uses from existing entitlements, facilities and resources?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.8(d) Alter existing drainage patterns causing substantial erosion, siltation, flooding, polluted runoff?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.8(e) Place housing or structures in a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
4.8(f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
4.8(g) Expose people or structures to inundation by seiche, tsunami, or mudflow?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
<b>§4.9. RECREATION</b>				
4.9(a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. Implementation of the REP update and VMT thresholds would not directly encourage population growth that would increase the

4.9(b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	demand for recreational facilities.
<b>§4.10. AESTHETICS, LIGHT &amp; GLARE, SCENIC RESOURCES</b>				
4.10(a) Have a substantial adverse effect on a scenic vista or scenic including trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and do not affect aesthetics, light & glare, or scenic resources.
4.10(b) Substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
4.10(c) Create a new source of substantial light or glare that would adversely affect day or nighttime views?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	
<b>§4.11. AGRICULTURE, FORESTS, CONSERVATION</b>				
4.11(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. Implementation of the REP update and VMT thresholds would not change zoning or land use designations, including agriculture and forest lands. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT and do not affect agriculture, forests, or conservation.
4.11(b) Conflict with existing zoning for, or cause rezoning of, forest land or result in the loss of forest land or conversion of forest land to non-forest use?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
<b>§4.12. POPULATION AND HOUSING</b>				
4.12(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	No Impact	None. Implementation of the REP update and VMT thresholds would apply to new housing units but would not directly generate the development of new

				housing units or encourage population growth.
4.12(b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	No Impact	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	No Impact	None. Implementation of the REP update and VMT thresholds would not generate the development of new housing units or encourage population growth.
<b>§4.13. PUBLIC SERVICES AND UTILITIES</b>				
4.13(a) Create a need for new or modified governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Police protection, Schools, Other public facilities, services and utilities?	Potentially Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Significant and Unavoidable	None. The REP update and VMT thresholds would not induce population growth and would not create a need for new or modified governmental facilities.
4.13(b) Result in a wasteful, inefficient, and/or unnecessary consumption of energy?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. The REP update contains the same goals, objectives, and policies applicable to energy efficiency that are contained in the General Plan. The REP update and VMT thresholds would not affect consumption of energy.
4.13(c) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs and comply with federal, state, and local statutes and regulations related to solid waste?	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. The REP update contains the same goals, objectives, and actions for solid waste that are contained in the General Plan. The REP update and VMT thresholds would not

				affect landfill capacity or solid waste disposal.
<b>§4.14. NOISE</b>				
4.14)a) Expose persons to or cause a permanent or temporary significant increase in ambient noise levels or result in noise levels exceeding standards set by the general plan or noise ordinance or other applicable standards.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	None. Neither the REP update nor the VMT thresholds include policies and actions that would directly or indirectly affect noise. The REP update and VMT thresholds provide procedures to streamline future CEQA analysis of GHG and VMT only and would not result in impacts on noise.
4.14(b) Expose persons to or generate excessive groundborne vibration or groundborne noise levels.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
4.14(c) Expose people residing or working in the project area to excessive noise levels for a project located in an airport land use plan or (where such a plan has not been adopted) within two miles of a public airport or public use airport or a private airstrip.	Less than Significant	Mitigated to extent feasible through Policies and Actions. No supplemental mitigations recommended.	Less than Significant	
<b>OTHER CEQA TOPICS</b>				
Cumulative Impacts on Agriculture associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP update and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Aesthetic and Scenic Values associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Biological Resources associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP update and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Cultural Resources associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for	To be determined	None. The REP update and VMT thresholds do not contain policies or

		Walker River Water Transfer Project Proposal.	through future EIR	actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Hydrology and Water Quality associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP update and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Land Use and Planning Associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP update and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts on Recreation Associated with Walker River Water Transfer Program	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in forthcoming EIR for Walker River Water Transfer Project Proposal.	To be determined through future EIR	None. The REP update and VMT thresholds do not contain policies or actions related to the Walker River Water Transfer Program.
Cumulative Impacts associated with Water Reclamation	Potentially Significant and Adverse	No Water Reclamation projects at this time.	To be determined through CEQA analysis when and if proposed.	None. The REP update and VMT thresholds do not affect policies or actions related to the Water Reclamation.
Cumulative Impacts associated with Landfill Closure	Potentially Significant and Adverse	Will be mitigated to extent feasible through measures in EIR for Benton Regional Landfill Closure and Replacement Project.	To be determined through CEQA analysis when replacement site is proposed.	None. Implementation of the REP update and VMT thresholds does not affect landfill closure plans.

## CONCLUSION

The 2022 REP update contains the same goals, objectives, policies, and actions as the 2014 REP that was adopted as part of the 2015 General Plan. The potential environmental impacts from implementation of the 2022 REP are consistent with the effects previously analyzed as part of the 2015 General Plan and included in the General Plan EIR. As such, additional analysis of the 2022 REP update is not required. The VMT thresholds and screening criteria establish thresholds for evaluation of VMT impacts in compliance with CEQA that are consistent with State policy and guidance. Adoption of the VMT thresholds and screening criteria would not cause an impact on the environment; therefore, additional analysis of the VMT threshold and screening criteria is not required.

Based on the considerations and analyses presented above and based on the provisions contained in CEQA §15164(a) as presented in its entirety in this Addendum, it is concluded that none of the conditions calling for preparation of a subsequent EIR have occurred. The County of Mono, acting as Lead Agency, has therefore determined that an Addendum to the adopted 2015 Mono County General Plan EIR is the appropriate CEQA document for the 2022 REP update and VMT thresholds and screening criteria.

CEQA §15164(c-e) states that *"an Addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project. A brief explanation of the decision not to prepare a subsequent EIR pursuant to §15162 shall be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence."*

# MONO COUNTY

## Community Development

---

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

Date: May 27, 2022

To: Mammoth Times

From: Heidi Willson

Re: Legal Notice for the **June 1** issue.

Invoice: Deanna Tuetken, PO Box 347, Mammoth Lakes, CA 93546

---

### NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Planning Commission will conduct a public hearing on **June 16, 2022**. The meeting will be held virtually at <https://monocounty.zoom.us/j/88293941545> where members of the public shall have the right to observe and offer public comment to consider the following: **9:30 a.m. Vehicle Miles Traveled (VMT) Thresholds of Significance and Resource Efficiency Plan Update**. Staff is presenting thresholds of significance for VMT for a potential recommendation of approval by the Planning Commission. Establishing thresholds will allow qualifying development projects to be streamlined under the California Environmental Quality Act (CEQA). Staff will also be presenting an update to the Resource Efficiency Plan. INTERESTED PERSONS are strongly encouraged to attend online or in person to comment, or to submit comments to the Secretary of the Planning Commission, PO Box 347, Mammoth Lakes, CA, 93546, by **8 am on Wednesday, June 15**, to ensure timely receipt, by email at [cddcomments@mono.ca.gov](mailto:cddcomments@mono.ca.gov). If you challenge the proposed action(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to Secretary to the Planning Commission at, or prior to, the public hearing.

###

## Mono County Planning Division\*: Current Projects

### June 9, 2022

\*Does not include transportation, LAFCO, building, code compliance, etc. projects

Active Planning Permit Applications		
Permit Type	Community	Description
GPA/SP/Cnnbs UP	Tri-Valley	cannabis cultivation, convert RR to AG
GPA	Bridgeport	STR compliance case, convert MFR-M to MU
GPA/UP	Mono Basin	waste transfer station
CEQA	Mono Basin	Mono County waste management transition
GPA/SP	Mono Basin	STRs & campground
SP Amendment	Paradise	RV/campground, commercial ag
UP/Cannabis	Antelope Valley	cultivation, distribution, non-storefront retail
Map Modification	June Lake	Consistency with approved variance
Parcel Map Mod/LM	Tri-Valley	Eliminate road and drainage improvements, County vacate road, rescind Subdivision Improvement Agreement, lot merger
DR/VHR	Topaz	Transient Rental on Mixed Use LUD
DR	Sunny Slopes	Stream setback reduction
DR	Sunny Slopes	Stream setback reduction for porch enclosure
DR	Crowley Lake	1,388 sf 2-bedroom accessory dwelling unit
LLA	Bridgeport	adjust lot line
LLA	Bridgeport	adjust lot line
LLA	Lee Vining	adjust lot line
LLA	Bridgeport	adjust lot line
LLA	Virginia Lakes	adjust lot line

Active Policy/Planning Projects		
Name	Community	Description
Study Impacts of Short-Term Rentals on workforce housing	Countywide	Report to Board by December 2022
Housing project negotiations	June Lake	Directed by CAO with Board guidance, respond to developer's request to negotiate for County participation to construct 12 housing units
Prepare for Housing Authority meeting on July 12, 2022	Countywide	Annual meeting
GHG/VMT CEQA Streamlining	Countywide	Update to County's GHG emissions inventory and CEQA streamlining for VMT analysis
Accessory Dwelling Units (ADUs)	Countywide + Mammoth Lakes	Prescriptive designs for study, 1 & 2 bedroom ADUs
Prescriptive designs for detached garages	Countywide	Update prescriptive designs for garages
North County Water Transfer	North County	Policies applicable to programs to sell/lease water for the benefit of Walker Lake
Housing Policy	Countywide	Housing Element tracking and policy development per Board's direction
Special District Study	Countywide	Contract approved, work to begin shortly
US 395 Wildlife Crossings	Long Valley	Project committee to construct wildlife crossings on US 395; Caltrans lead



<b>Active Policy/Planning Projects</b>		
June Lake Active Transportation Plan	June Lake	Planning charrette - June 22-26
West Walker River Parkway	Antelope Valley	Grant application submitted, working on conceptual trail alignment and final park plan
Revision to Chapter 11	Countywide; Antelope Valley	Review and revise utility undergrounding policies and requirements
Cannabis Odor Standards	Countywide	Low priority, readings to be taken with Nasal Ranger this spring and fall
Annual General Plan Update	Countywide	Continuously track minor changes for an annual update
Update General Plan Map Layers	Countywide	Update online

**Acronyms:**

AG	Agriculture
CEQA	California Environmental Quality Act
DR	Director Review
GHG	Greenhouse Gas
GPA	General Plan Amendment
LLA	Lot Line Adjustment
LUD	Land Use Designation
MFR-M	Multi-Family Residential - Medium
MU	Mixed Use
RR	Rural Residential
SP	Specific Plan
STR	Short-Term Rental
UP	Use Permit
VHR	Vacation Home Rental
VMT	Vehicle Miles Traveled



**Help make walking and biking  
in June Lake better!**

## **June Lake Loop Active Transportation Plan**

**Join Us** at the ATP events to provide your feedback about key walking and bicycling destinations, the most important facility types, and any barriers to walking and bicycling the June Lake Loop.

**Wednesday, June 22, 2022 | 6-8 PM**

### **Community Workshop**

June Lake Community Center | 90 W Granite Ave

*Families and children are welcome!*

*Food and refreshments will be provided!*

**Thursday, June 23, 2022 | 10-11 AM**

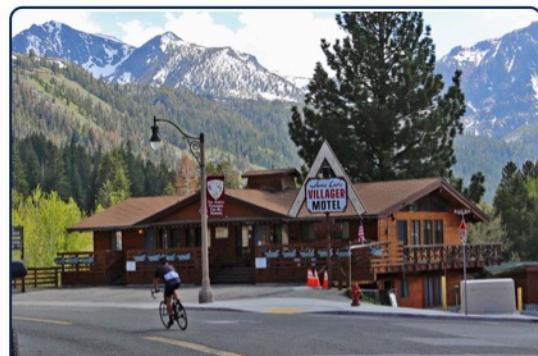
### **Village Walking Audit**

Meet at Post Office | 2747 Boulder Dr

**Friday, June 24, 2022 | 4-6 PM**

### **Draft Recommendations Open House**

On Highway 158 near the General Store and Epic Café



#### **WE NEED YOUR HELP**

Mono County is developing an Active Transportation Plan for the June Lake Loop that will identify priority areas for pedestrians and cyclists to walk or bike along or across SR 158. This will help the County identify priority areas for pedestrian/bicycle improvements, recommend specific projects, and help secure project funding.

After these events, the design team will present the draft plan back to the community at an event in the fall, and then to the County Board of Supervisors.

***Keep an eye out for our popup table events on the Loop that week!***

#### **Take our Survey!**

Please take this survey to inform us about the challenges you experience while walking or biking in the June Lake area and your ideas about how to solve them.

[www.surveymonkey.com/r/JLLoop](http://www.surveymonkey.com/r/JLLoop)



#### **Stay Involved:**

Visit us online at  
[bit.ly/june-lake-atp](http://bit.ly/june-lake-atp)

#### **For More Information:**

Kelly Karl  
Mono County CDD  
760.924.1809 (Office)  
[kkarl@mono.ca.gov](mailto:kkarl@mono.ca.gov)



**¡Ayuda a mejorar el caminar y andar en bicicleta en June Lake!**

## Plan de transporte activo de June Lake

**Participe** en los eventos del Plan de Transporte Activo (ATP) para dar sus comentarios sobre los principales destinos para caminar y andar en bicicleta, las instalaciones más importantes y cualquier obstáculo para caminar y andar en bicicleta en la trayectoria en torno a June Lake, el "loop".

**miércoles, 22 de junio de 2022 | 6-8 PM**

### Taller Comunitario

Centro Comunitario June Lake | Avenida Granite 90 W

*¡Las familias y los niños son bienvenidos!*

*¡Habrá comida y refrescos!*

**jueves, 23 de junio de 2022 | 10-11 AM**

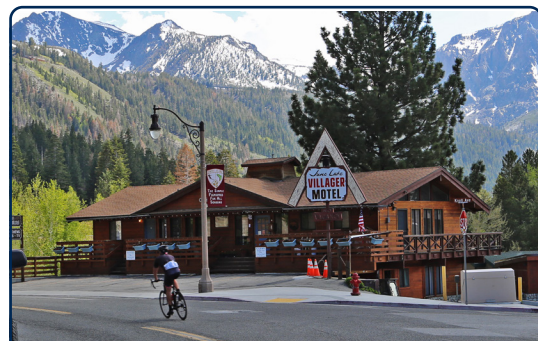
### Auditoría peatonal de la aldea

Reúnase en la oficina de correos | Calle Boulder Drive 2747

**viernes, 24 de junio de 2022 | 4-6 PM**

### Jornada de puertas abiertas para ver las recomendaciones preliminares

En la carretera 158 cerca de la Tienda General y Café Epic



### NECESITAMOS SU AYUDA

El Condado de Mono está desarrollando un Plan de Transporte Activo (ATP) para June Lake "Loop" que identificará áreas prioritarias para que los peatones y ciclistas caminen o anden en bicicleta a lo largo o a través de la carretera 158. Esto ayudará al Condado a identificar áreas prioritarias para mejoras para peatones y ciclistas, recomendar proyectos específicos y ayudar a conseguir financiamiento para el proyecto.

Después de estos eventos, el equipo de diseño presentará el borrador del plan a la comunidad en un evento en el otoño, y luego a la Junta de Supervisores del Condado.

**¡Esté atento a eventos en esa semana en el "loop" de June Lake!**

### ¡Tome nuestra encuesta!

Complete esta encuesta en línea para informarnos sobre los problemas que enfrenta cuando camina o anda en bicicleta en el área de June Lake, y para compartir sus ideas sobre cómo resolverlos.

[www.surveymonkey.com/r/JLLoop](http://www.surveymonkey.com/r/JLLoop)



### Manténgase involucrado:

Visítenos en línea en [bit.ly/june-lake-atp](http://bit.ly/june-lake-atp)

### Para más información:

Kelly Karl  
Mono County CDD  
760.924.1809 (Oficina)  
[kkarl@mono.ca.gov](mailto:kkarl@mono.ca.gov)