

May 10, 2022

Michael Vanderhurst,
Chair, Economic Development & Planning Commission
Commissioner Jennifer Burrows, Vice Chair
Commissioner Paul Chang
Commissioner Jessica Kennedy
Town of Mammoth Lakes
437 Old Mammoth Rd. Ste R
Mammoth Lakes, CA 93546

Dear Chair Vanderhurst and Commissioners,

I would like to say how disappointed I am with your most recent Villas III Staff Report, May 11, 2022. After reviewing the report, I can only say that I have zero trust in the PEDC. While a few concessions have been made, **most of the issues expressed by the community have not been addressed in a transparent way.** The genuine concerns of the community have been ignored in your report and the developer is completely favored. This is wrong! Does the 150 signatures and over 40 letter from the community have no value? If this is typical of the way the PEDC reviews projects, it is shocking.

The addendum for the EIR is 31 years old and the EIR Report is outdated. I am confident the Town is not complying with CEQA by using the addendum. The Planning Commission and staff are being glib. Yes, the Certified EIR retains information value, but why then prepare a 156 page long addendum that includes six new technical appendices if there aren't "substantial changes in the circumstances under which the project is being undertaken..." The answer, albeit cynical, is that the Town wishes to forestall any public review of the environmental documentation.

Additionally, the EIR is a Program EIR, and the intention is for such a document to have subsequent Environmental Review as the components of the program (developments in this case) come up for approval. A 33-year-old programmatic document requires far more than just "minor technical changes" that would allow for an addendum. It must be revisited. Many current environmental impacts and issues have not been addressed, no matter how the Commission and Town staff try and reframe it. See my letter dated March 3, 2022.

The new shadow study is the same as the first and old shadow study. As a full-time, permanent resident living in San Joaquin Villas for 16 years, the snow will take months well into June to melt in between Villas III and SJV Building E.

As well, the snow load from Villas III will bury us at San Joaquin Villas, ***no matter how you try to say or show otherwise.*** Yes, the snow from Villas III will shed to the side but then blow in and pile up in the narrow space between Villas III and San Joaquin Villas, leaving the first stories of San Villas in a snow cave all winter long, well into the spring. The bottom line is that SJV ground floors will have no access to outlets in case of fires. No regular or emergency access to our backyards. This is dangerous and potentially life threatening and it is an untenable impact that must be readdressed. The Villas III buildings 22-25 must be removed or moved farther away from SJV.

While the back balconies on units 22-25 are "removed," the balcony depth (7 feet) was converted into living space. So now instead of balconies there will be a wall with big windows on the outer edge of where the balconies were planned. Since Callahan Way is planned as a primary entrance, the north

property line setback had to be increased to 25'. The originally planned 20' setback was an error. Even after correcting this with 5' of additional setback and "removing" the balconies, the living space for units 22-25 is now closer to SJV than ever before.

Villas III created the space for the 5' setback by creating a duplex model "B" that is 6.5' shorter in length than the original (model "A"). These shorter "B" models are also planned for units 26-33, and that frees up 13' of unbuilt land between the 4 duplex buildings. That 13' should be used as additional setback behind units 22-25 along the northern border with SJV. We know additional setback is desperately needed for quality of life, and this extra 13' on Villas III was not needed. Everyone is better off increasing the setback from 25' to 38' (see attached).

The report also indicates that the height of Villa III Buildings 22-25 is being reduced with a set-down, making Villas III Buildings 22-25 approximately the same height as San Joaquin Villas. This is helpful to know, and ***we will require ongoing assurance that the developer will be held to this plan revision. I am very skeptical because there are no plans requiring Town approval and enforcement.***

Our community continues to be extremely concerned that access to Villas III is via Callahan Way. Is the Commission aware that every time there is a storm, cars get stuck on Callahan Way when snow clearing crews cannot keep up with the accumulated snow? These cars are usually heading to the Quonset hut that the San Diego Ski Club operates on Callahan. When cars get stuck, they are simply abandoned on the spot in the middle of the road, leaving the plow no access to get to the San Joaquin Villa parking lot. That in turn leaves all the San Joaquin Villa work force – 150 plus – unable to get to work: physician assistants, nurses, restaurant workers, school bus drivers, school district employees, mountain employees, etc. The projected increased traffic on Callahan Way to access Villas III greatly increases the percentage of cars abandoned during a storm. Callahan also has a significant incline making it impossible on many icy, snowy days for cars to enter and exit. You can put up as many signs as you would like, but the MLPD will do nothing because Callahan is a PRIVATE road and MLPD will not tow or ticket a vehicle on a private road. If cars for one reason or another can't get to Villas III, they will park illegally, including in the middle of the road, in the San Joaquin Villas parking lot and at Loco Frijoles Restaurant. This has happened every winter and will happen more often if the access to Villas III is via Callahan Way.

Please understand, as well, that SJV is home to many young children and pets. If Callahan becomes a through-street and is the only access to Villas III, the traffic will increase exponentially. Visitors will be flying through with no regard to children playing nearby. This is setting up our community for a tragic accident.

The solution is simple and much safer. Make the access to Villas III via Meridian Blvd and the developer's other property, Obsidian. This way Villas III guests, unfamiliar with our roads and neighborhoods and snow conditions, will not be driving through a residential, workforce neighborhood. San Joaquin Villas will not have more cars abandoned on Callahan Way during storms, in our parking lots/Loco Frijoles Restaurant preventing us from getting to and from work.

Thank you once again for your consideration of the tremendous impacts this development, as it stands, have on your constituents' quality of life and safety.

Donna Mercer
San Joaquin Villas Resident
Mammoth Resident for 25 years
CC:

Mayor, Lynda Salcido
City Council Member John Wentworth
City Council Member Bill Sauser

City Council Member Kirk Stapp
City Council Member Sarah Rea