

Date: May 9, 2022

To: Mammoth Lakes Planning Commission (PEDC)  
Copy to: Mammoth Lakes Town Council  
Regarding: **Villas III - Onsite Snow Storage Problem**

My name is Sue Farley, and I am retired from a career with the Forest Service, previously working on the Mammoth Ranger District. This is my fourth comment letter regarding the Villas III development application.

I have reviewed the Villas III project plans and this project's Snow Storage Area is not even close to large enough to satisfy the Required Snow Storage of 31,834 SF. The project's snow storage is not consistent with the applicable standards and requirements of the Municipal Code. Please do not approve the plan as presented.

The errors are obvious and simple to understand given the Project Plans and the Town's ordinances. A full copy of the Town's snow storage ordinance 17.36.110 is attached for convenience.

1. Applicant's EIR addendum states 31,834 SF required, and 31,998 SF provided.
2. Villas III TTM 5 shows the Proposed Snow Storage Area of 31,998 SF.
3. Villas III TTM 3 and 4 show the existing TREES to remain on site.
4. ToML Ordinance 17.36.110 on Snow Storage states, **"Snow storage areas shall be located in areas that are readily accessible and substantially free and clear of obstructions (e.g. trees)"**
5. 17.36.110 also states, **"The minimum dimension of a snow storage area shall be ten feet in any direction (10' x 10')."**

The Applicant's analysis fails to consider the 82 existing trees located in the middle of their planned snow storage area (see Attached). Trees are in the middle of at least 1/3 of the planned snow storage area. These areas with tree "obstructions" are not readily accessible by snow moving equipment, and do not qualify as snow storage per the Town's ordinance.

Additionally, their analysis includes areas much smaller than 10'x10' in size that do not qualify.

The correct snow storage calculation for Villas III is:

**Actual Snow Storage Area Proposed: 21,084 SF**  
= 31,998 – (10,664 for Trees) - (250 for not meeting minimum size)

**Additional onsite snow storage needed for compliance with Municipal Code: 10,914 SF**

The Lodestar Master Plan states that **"where snow storage areas cannot be provided for the project area, a minimum 30-foot setback from the edge of pavement of interior circulation streets shall be required."** (Page 8 of 56, #6).

I am very concerned that the Applicant's claims have been accepted at face value and have not been

thoroughly checked. Please require this project to meet the legal requirements for snow storage.  
**Their own documents show that almost 11,000 additional square feet of snow storage is needed and this significant miscalculation must be addressed.**

Thank you for your consideration.

Sincerely, *Sue Farley*  
San Joaquin Villas #C6 Resident and Owner

Attachment (1)