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December 22, 2009

Scott Burns
Community Development Director
Mono County Community Development Department
Post Office Box 347
Mammoth Lakes, CA 93546

By Email and U.S. Mail

Re: ***Intrawest's June Lake Rodeo Grounds Specific Plan Application***

Dear Scott:

This letter responds to your letter to Joe Walsh dated July 2, 2008, and follows up on my telephone conversations and meetings with you, Larry Johnston, and Mark Magit since we received your letter. This letter: (1) amends Intrawest's application for the Rodeo Grounds Specific Plan to reduce the number of General Plan Amendments required to process the application; and (2) responds to the comments offered and questions raised by the June Lake Citizens Advisory Committee ("CAC") and the Community Development Department ("CDD") that accompanied your letter.

1. ***Intrawest's Seeks to Amend its Specific Plan Application to Reduce the Number of General Plan Amendments Required.***

Intrawest seeks to amend its Specific Plan application to reduce the number of General Plan amendments that will be required to process the application. To that end, we have quoted from your letter each instance in which the CDD has concluded that Intrawest must apply for a General Plan Amendment in order to process its Specific Plan application. After each quote, we address whether Intrawest intends to pursue, withdraw, or amend the request that triggers the need for the General Plan Amendment.

- A. "Clarify that one structure will be allowed up to 90' and three structures up to 70' in the Resort Core." **Response:** Intrawest seeks to clarify that only one structure will be allowed in the Resort Core up to 90 feet in height and that the 90-foot height zone will be located and sized to accommodate any structure which substantially conforms to the building envelope for the 90-foot structure which is identified as "Building P" in Figures 1.a through 1.i in Appendix I, which is

attached to the Specific Plan application. Intrawest does not seek to limit the number of structures that will be permitted in the 70-foot height zone. The number of structures permitted in the 70-foot height zone will be limited by the setback, site coverage, and building separation requirements set forth in the Specific Plan.

- B. “Front yard setbacks reduced to 10 feet (versus GP standard of 20’) in the multi-family and single-family areas.” **Response:** Intrawest withdraws its request to reduce front yard setbacks to 10 feet in the multi-family and single-family areas, and will comply with the General Plan standard of 20-foot setbacks.
- C. “Allow structures up to 45’ in the multi-family areas (versus GP standard of 35’) without additional setbacks.” **Response:** Intrawest withdraws its request to allow structures up to 45 feet in the multi-family areas without additional setbacks, and will comply with the setback requirements in the General Plan that apply to multi-family structures that exceed 35 feet in height.
- D. “Change the Area Plan Objective J, Policy 1, Action 1.1 to exclude the Rodeo Grounds from providing 25% of the employee housing of June Mountain’s peak period work force based on 7,000 skiers-at-one-time buildout.” **Response:** Intrawest seeks to amend Action 1.1 as necessary to accommodate Intrawest’s proposed Affordable Housing Mitigation Plan set forth in section 6.0 of the Specific Plan application.
- E. “Modify the parking standards of the General Plan to allow fewer parking spaces for the various uses proposed (e.g., single-family from 3 to 2, etc.)” **Response:** Intrawest withdraws its request to reduce the parking standards of the General Plan for single-family residences as set forth in section 4.6.5 of the Specific Plan application. Intrawest seeks a General Plan Amendment as necessary to accommodate all of the remaining parking standards set forth in section 4.6 of the Specific Plan application.
- F. “Modify the maximum lot coverage from 40% up to 50% for secondary units on SFR lots.” **Response:** Intrawest withdraws its request to increase the maximum lot coverage for secondary units on SFR lots.
- G. “Allow transient rentals in SFR areas.” **Response:** Intrawest seeks a General Plan Amendment to allow transient rentals in the SFR areas.
- H. “Allow secondary units up to 850 sf (versus 500 sf or 640 sf) without a Director Review or Use Permit (depending on lot size).” **Response:** Intrawest withdraws its request to allow secondary units up to 850 square feet without a Director Review or Use Permit.

II. ***Intrawest's Responses to the Comments and Questions from the CAC and the CDD.***

Attached to your letter are 26 categories of comments and questions from the CAC and the CDD. The first category contains comments and questions quoted from the CAC's August 2008 Worksheet and the Minutes from the CAC's September 2, 2008 meeting, many of which are supplemented by further comments and/or questions from the CDD. Categories 2 through 26 contain the CDD's comments to the Intrawest's Specific Plan application dated June 8, 2009. We respond to the CAC's comments and questions in section II.A below, and respond to the CDD's comments and questions in section II.B below.

A. **Intrawest's Responses to the CAC's Comments and Questions.**

In its preface to the first category of comments and questions, the CDD states: "[T]he present proposal does not address the Peer Review requirements that were undertaken by the CAC in last year's review of the project. In short, it is not specific enough to meet most of those review mandates." As set forth below: (1) Intrawest rejects the CDD's claim that the Specific Plan application does not address the comments made and questions posed by the CAC in its 2008 review of the draft project application; (2) the CAC and the CDD have sought more detail and specificity in the Specific Plan application than is required by law or otherwise prudent; (3) Intrawest amends its Specific Plan application to require conditional use permits for each building within the Resort Core and multi-family land use designation to ensure that the County receives all of the detail and specificity required in a timely manner; and (4) Intrawest supplements its responses to the CAC's comments and questions.

1. **Intrawest's Specific Plan Application is Responsive to the CAC's Input.** Intrawest rejects the CDD's claim that the Specific Plan application does not address the CAC's input regarding the 2008 draft project application. As you know, on June 8, 2009, Intrawest representatives made a public presentation to the CAC, during which they outlined each instance that they had revised the application in direct response to the CAC's comments. Specifically, Intrawest demonstrated how the revised application addressed the CAC's concerns regarding: (a) architecture within the Resort Core (by agreeing to require a use permit for each building within the Resort Core); (b) the building heights within the Resort Core (by creating specific height zones within the Resort Core); (c) public access and trails (by committing to provide public easements over all roads and trails within the Specific Plan area; (d) affordable housing (by creating the Affordable Housing Overlay Zone); (e) ridgeline views (by requiring stepbacks for structures located near ridgelines and by committing to the dedication of open space at specific ridgelines); and

(g) project density (by committing to a maximum of 10 units per acre, including affordable housing). It appeared to us that the CAC welcomed the responsiveness that our presentation highlighted, and we did not hear any comments from the CAC that would have led us to believe otherwise.

Intrawest values the CAC's input as the primary means by which Intrawest may understand the June Lake community's needs, desires, and expectations for the Rodeo Grounds. As important and instructive as the CAC's comments are, however, we do not agree with the CDD's characterization of those comments as "requirements" or "mandates." Strict compliance with each of the comments made by the CAC is neither required for the CDD to determine that Intrawest's Specific Plan application is complete nor for the Board of Supervisors to approve the application. Nonetheless, Intrawest welcomes the CAC's ongoing input and will continue to incorporate that input into its planning efforts as it proves consistent with good planning practices and financial feasibility.

2. **The CAC and the CDD Have Sought More Detail and Specificity in the Specific Plan Application than is Required by Law or Otherwise Prudent.** We believe that the CAC and the CDD have sought too much detail and specificity in Intrawest's Specific Plan application. For example, building dimensions, building square footage, floor plans, tree replacement plans, phasing plans, architectural details, construction materials, infrastructure cost estimates, shuttle schedules, snow storage plans, grading plans, and construction staging areas need not be included in a Specific Plan.

As you know, a Specific Plan is a legal tool authorized by Article 8 of the Government Code (section 65450 *et seq.*) for the systematic implementation of the general plan for a defined portion of the community's planning area. Thus, the term "specific" refers to a planning area, and does not refer to the level of detail required by the document. Government Code section 65451 requires a specific plan to include text and diagram(s) which specify all of the following in detail:

1. The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan;
2. The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid water disposal, energy, and other essential facilities proposed to be located within the area

covered by the plan and needed to support the land uses described in the plan;

3. Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable;
4. A program of implementation measures including regulations, programs, public works project, and financing measures necessary to carry out paragraph 1, 2, and 3 above.

Intrawest's application fully complies with these provisions of the Government Code. Intrawest sees no compelling reason to provide the County more detail and specificity than State law requires. Intrawest must balance the County's desire for increased detail and specificity with the fact that the Specific Plan must be flexible enough to accommodate the ongoing goals of the County and the developer in the face of changing market conditions and financing options over the next decade and beyond.

3. **Intrawest Amends its Specific Plan Application to Require Conditional Use Permits for Each Building Within the Resort Core and Multi-family Land Use Designations to Ensure that the County Timely Receives All of the Detail and Specificity that it Desires.**

Although we believe that the County has sought too much detail and specificity in Intrawest's Specific Plan application, we do believe that the level of detail specificity that the County seeks is entirely appropriate in response to a developer's application for a conditional use permit. Therefore, in order to ensure that the County receives all of the detail and specificity required in a timely manner, Intrawest amends its Specific Plan application to require the developer to apply for and obtain a conditional use permit for each building within the Resort Core and the multi-family land use designations.

4. **Intrawest's Supplemental Responses to the CAC's Comments and Questions.** We quote below each of the comments and questions from the CAC's 2008 Worksheet and the Minutes of the CAC's September 2, 2008 meeting. Following each quote are the CDD's additional comments, if any, on the topic. We then respond to each comment.

a. ***The CAC's 2008 Worksheet.***

a) *CAC Worksheet 1.4: "Buildings constructed on hillsides should step to follow the natural terrain – level pads on slopes are*

discouraged...” Not enough detail to determine that the Resort Core buildings are stepped to follow the terrain – instead large cuts/fills appear needed to create level pads. **Response:** Detailed architectural and engineering plans for the Resort Core buildings will be presented to the CDD in connection with the use permit applications for those buildings.

b) *CAC Worksheet 2.1: “Provide a detailed grading concept, slope treatment...”* Grading plan insufficient- shows only minimal streets grading. **Response:** Detailed grading plans for each development phase will be presented with the use permit application for that phase.

c) *CAC Worksheet 3.1: “We want to follow what is already in June Lake. Lots of people like the architectural mix... Do not think it reflects the scale... Character of June Lake is mixed; big houses and little houses together. Mix the unit types on the streets versus separated enclaves.”* What is proposed appears incongruous with this recommendation. **Response:** Intrawest proposes three distinct residential land use designations (Resort Core, multi-family, and single family) and an Affordable Housing Overlay Zone. Each residential land use designation will have its own unique focus and purpose. We do not believe that good planning practices would guide Intrawest to “mix the unit types on the streets.” Nonetheless, we fully expect that an “architectural mix” that is consistent with the Design Guidelines will develop within each land use designation over time. For example, Intrawest proposes a single family land use designation, but does not intend to construct any single family homes. Therefore, the “architectural mix” within the single family zone will flow from a variety of factors, including lot owners’ personal preferences, as informed by the Design Guidelines and the Design Review Committee (“DRC”).

d) *CAC Worksheet 3.2: “Want to ensure public access over private streets. No gated communities. There should be a public access easement over the trails, roads and open space. No property line fencing.”* Easement locations need to be specified in the proposal. **Response:** Intrawest agrees to offer public access easements over all of the roads, trails, and open space that are identified in, or contemplated by, the Specific Plan application. Trails within the Specific Plan area will be located to connect to existing trails outside the Specific Plan area. There will be no gated communities within the Specific Plan area..

- e) *CAC Worksheet 3.4: "Specify cladding and roofing materials, colors and building details that respect the mountain village character. - In Specific Plan and design standards."* The design guidelines are vague on this. **Response:** Intrawest believes that section 3.6 of the Design Guidelines, entitled "Building Exterior and Finishes", provides an applicant and the DRC sufficient guidance regarding the types of cladding, roofing materials, colors, and building details that are consistent with the community's mountain village character. Any more specificity would limit both the DRC's discretion and an applicant's use of new and innovative building materials over time.
- f) *CAC Worksheet 4.2: "Limit garage-dominated streetscape. Explore alternatives, incorporate in design guidelines."* This should be addressed with examples and incorporated in the design guidelines. **Response:** The design and placement of all garages within the Resort Core and the multi-family zone will be determined through the use permit application process. The design and placement of all garages within the single family zone will be determined through the design review process. We believe that section 3.5 of the Design Guidelines, entitled "Garage Placement", provides sufficient guidance on the topic to the Planning Commission and the DRC.
- g) *CAC Worksheet 4.4: "All corner and prominent buildings in the RC and NC should be identified and designed as corner buildings with wraparound porches and different window treatment and roof lines. This should be spelled out in the proposal/design guidelines."* Not enough detail to determine. **Response:** We do not understand the reference to "NC" in the CAC comment. We do not agree that it would be wise to require every prominent building within the Resort Core (or within any LUD) to contain a "wraparound porch". In any event, it is not appropriate for the Specific Plan to dictate the design of any portion of any building that will be subject to a conditional use permit process. We believe the Design Guidelines, and specifically sections 3.2. and 3.3, entitled "Massing" and "Building Fenestration and Elevations" respectively, provide sufficient guidance to the applicant, DRC, and Planning Commission with regard to the design of building corners, roof lines, and window treatments, while still encouraging an interesting mix of architecture consistent with the community's mountain village character.
- h) *CAC Worksheet 4.5: "Use a variety of housing design to create interesting streetscapes... Provide examples of different architectural styles."* The model that was prepared seemed to have addressed this

but there is not enough detail to determine. **Response:** In lieu of providing examples of different architectural styles, Intrawest has proposed Design Guidelines that will accommodate different architectural styles that are consistent with June Lake's mountain village character.

i) *CAC Worksheet 5.1: "Want buildings to be articulated, stepped down at the ends with quality architecture. Let's get the model. Create more interesting roof lines."* Not enough detail to determine. **Response:** Section 3.2 (Massing), 3.3 (Building Fenestration and Elevations), and 3.4 (Roof Form) provide sufficient guidance to the applicant, DRC, and Planning Commission to ensure that these goals will be met.

j) *CAC Worksheet 7.1: "Before occupancy, applicant to build trails from project that will connect to down canyon and June Beach and June Village, via a trail-phasing program."* No trail phasing plan included. **Response:** No trail phasing plan is included because Intrawest has not proposed a development phasing plan. The development of the project will be phased as project economics, market demand, and the availability of construction financing dictate. Nonetheless, Intrawest believes that the Specific Plan should require the construction of any trail sections that serve an adjacent residential project to be completed prior to the receipt of any certificate of occupancy for any units within that project.

k) *See CAC Worksheet item 8. Worksheet 8.2: "Provide workforce housing mixed within each phase of the neighborhood, following ordinance."* The proposal is incongruous with the housing ordinance (see also below). **Response:** Intrawest proposes to create an Affordable Housing Overlay Zone that will permit workforce housing to be located within any LUD within the Specific Plan, with the exception of LUD 4 (Light Industrial) subject to specific development standards.

l) *CAC Worksheet 10.2: "The approval should provide certainty that improvements will be made to June Mountain in a timely manner."* This should be detailed in the Specific Plan. **Response:** Intrawest does not own or control June Mountain. Therefore, Intrawest cannot dictate or influence if and when June Mountain will be improved.

b. Minutes of September 2, 2008 CAC Meeting.

“a) CAC Worksheet of July 1, 2008 adopted August 5, 2008, to be included.

b) Five guidelines of August 5, 2008 adopted September 2, 2008, to be included

[These are:

- 1) Design the project to better fit into the character of June Lake.*
- 2) Reduce Grading and Environmental Impacts*
- 3) Provide Public Amenities/Benefits Early in the Project*
- 4) Provide more Diversity and Detailed –Quality Design*
- 5) Logical and Community Benefiting Phasing Program]*

c) The resort development must be first before the neighborhood.

Response: Project economics, market demand, and the availability of construction financing will determine the order in which any phase of the Specific Plan will be constructed.

d) Condition the permit for resort developer to work with June Mountain to ensure that Ski Area improvements are performed commensurate with improvements to the resort development.

Response: A local agency may not impose any condition on a landowner that the landowner is not capable of performing or that requires concerted action by others who are not a party to the transaction and over whom the landowner has no control. *See Munns v. Stenman* (1957) 152 CA2d 543, 552. Intrawest does not own or control June Mountain. Therefore, the County may not condition the approval of the Specific Plan, or any development pursuant to the Specific Plan, upon the construction of any improvements at June Mountain at any time.

e) Each major phase of the Resort Development should be subject to a use permit process with design and architectural recommendation /review by the CAC. **Response:** Intrawest amends its Specific Plan application so as to require conditional use permits and appropriate design review for any buildings within the Resort Core or multi-family land use designation.

f) Mass and scale specifying a single building with a height of 90 feet, adjacent buildings at 75 (sic 70) feet, and surrounding building heights of 45 feet for the resort core only, are acceptable. Needs additional details to satisfy.” **Response:** Intrawest seeks to clarify its application to ensure that only one structure will be allowed in the

Resort Core up to 90 feet in height and that the 90-foot height zone will be located and sized to accommodate any structure which substantially conforms to the building envelope for the 90-foot structure which is identified as "Building P" in Figures 1.a through 1.i in Appendix I attached to the Specific Plan application. Intrawest does not seek to limit the number of structures that will be allowed in the 70-foot height zone. The number of structures permitted in the 70-foot height zone will be determined in accordance with the setback, site coverage, and building separation requirements set forth in the Specific Plan.

B. **Intrawest's Responses to the CDD's Comments and Questions.**

We quote below each of the comments and questions that the CDD has offered in response to Intrawest's Specific Plan application dated June 8, 2009. We then respond to each comment and question.

2. Although labeled as a Phasing section of the document (11.1.3) a phasing plan has not been provided for the project-all that is given is a list of phases with no particular order or time frame. **Response:** Intrawest cannot provide a phasing plan at this time. The phasing of construction projects consistent with the Specific Plan will be determined by market demand, project economics, and the availability of construction financing.
3. A 'community site' is allowed in the Resort Core, in the Multi-family, and in the Single-Family area but there is no clear definition or location or size specified. The community site is referenced to section 3.3 but there is not description contained therein. In addition the Light Industrial site appears to allow a 'community site' as well. More detail is needed as to what this is. **Response:** Intrawest remains willing to provide the County a "community site" that meets the County's needs. We await further input from the County as to what it needs, and we will do our best to comply with any reasonable requests by the County to meet its needs.
4. The Resort Core allows for single-family development and lists single-family lot dimensions-this is inconsistent with CAC recommendations that this area be 'hot beds' and it is inconsistent with the Resort Core description in section 3.3- '...the primary node for resort activity and guests...' **Response:** Intrawest amends its application as may be necessary to ensure that single-family lots are not permitted within the Resort Core.
5. The Resort Core appears to have little or no setback requirements albeit very large buildings are permitted (e.g., "Front 10, Rear 5, Side 0 feet..."). Is this correct? **Response:** Intrawest is receptive to hearing the CDD's

recommendations regarding the appropriate setback requirements for buildings within the Resort Core.

6. The Resort Core mentions the possibility of commercial but has no specified size. As written, the commercial could be very large or small and there is no way to determine impacts such as traffic or effects on other existing commercial establishments in the Loop. **Response:** Intrawest amends its application to allow for up to 40,000 square feet of commercial uses within the Resort Core.

7. The Multi-family area allows for single-family development and lists single-family lot dimensions-this is inconsistent with CAC recommendations that single-family development is not what is needed. **Response:** We do not believe that the CAC has concluded that single-family development is not needed. We believe that the CAC seeks a mix of residential options.

8. Estimates of the square footage of Townhouses and Multi-family units and typical floor plans are needed - are these "lock-off" units? **Response:** Intrawest's application envisions that lock-off units would be permitted within the Resort Core and the multi-family LUD. We do not believe that the County needs the estimated square footage of the multi-family units and/or typical floor plans to process the Specific Plan application. The size and floor plans of townhouses and multi-family units will be determined through the use permit application process for those projects.

9. Estimates of the square footage of Townhouse and Multi-family units and typical floor plans are needed - are these "lock-off" units? **Response:** This comment and question are duplicative of number 8. Please see our response to number 8.

10. An alternative to the standard Housing Mitigation Ordinance requirements may be proposed provided that "...the alternative proposal meets the purpose of this chapter and provides a greater housing benefit to the community than would otherwise be attained through building affordable dwelling units or the payment of fees in accordance with this Chapter." In order to evaluate an alternative, two items are needed. First, what are the housing requirements under the Ordinance, and second what is the basis on which the alternative meets each variance requested from the ordinance.

In order to calculate Housing Ordinance requirements, the following information is needed to develop a more precise housing ordinance calculation in order to evaluate your proposed alternative:

- a. Square footage of each lodge structure
- b. Square footage of typical lodging units within buildings

- c. Number of each type of unit and square footage of each unit; lock-off units?
- d. Typical floor plans that clearly delineate all sleeping areas.
- e. Number of SFR lots
- f. Number of condominiums
- g. Estimated number of dwelling units exceeding 2400sf.
- h. Square footage of all commercial space

To evaluate your alternative, it needs to be more detailed than what you have provided. For example, will most of the alternative housing be in large apartment units as in past submittals? If so, how is this equivalent to family housing that the Ordinance requires? **Response:** We recognize that the Ordinance states that an alternate housing proposal must provide a greater housing benefit to the community than would otherwise be attained through building affordable dwelling units or the payment of fees. Section 6.4 of the application states how the alternative proposal differs from the Ordinance and why we believe it is of greater benefit to the community.

We cannot demonstrate that benefit through the formula that the CDD has proposed above because we do not know all of the information that the CDD has requested. Specifically, we do not know: a) the square footage of each lodge structure; b) the square footage of typical lodging units within buildings; c) the number of each type of unit and square footage of each unit; d) the total number of lock-off units; e) typical floor plans; or f) the estimated number of dwelling units exceeding 2400 square feet. The developer must have sufficient flexibility to meet the needs of the workforce housing market over time.

11. Cost estimates are needed for the infrastructure necessary to serve the project. This includes water, sewer, storm drainage, snow removal, and any other services needed for local residents and guests. **Response:** We do not believe that a Specific Plan application is required to include cost estimates for the infrastructure necessary to serve the project. Government Code section 65451 requires a Specific Plan to include "a program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out" the construction of the infrastructure. Intrawest's proposed infrastructure implementation plan is contained in sections 11.1.1 and 11.1.2 of the application. All of the infrastructure improvements will be privately funded.

12. What is the proposal for safe pedestrian crossing over highway to the ski area (e.g., shuttle bus and timing of when buses will be provided, cross walk(s), lighted signal, etc.?) **Response:** We will not know the answer to this question until the first use permit application in the Resort Core is submitted.

Therefore, we recommend that the Specific Plan require that this information be provided in connection with the first use permit application for any building with the Resort Core.

13. Is the gondola a part of the project? If it is, then there needs to be a written verification from JMSA that they wish to have this included in the analysis (which would be part of the Environmental Assessment application to the USFS). **Response:** The gondola is envisioned to be one of several options to transport people from the Resort Core to JMSA. Nonetheless, the applicant is in no position to commit to construct the gondola, so any environmental assessment by the USFS would be premature. If and when JMSA commits to participate in the planning for and construction of the gondola, we will obtain and deliver the verification from JMSA that the CDD has requested. In the meantime, we would like to amend our application to include the gondola and its accompanying structure and appurtenances as permitted uses in LUD 1.

14. An application to the USFS needs to be submitted in order to consider off-site improvements like the water lines and tank. Inventory of existing trees with tree sizes (over 12" dbh-diameter breast height) and over and overlay of site plan showing which trees will be removed including all trees (even if less than 12" dbh). Include estimate of tree removal for fire fuel modification to 100'. Replanting plan also needed. See tree replacement schedule in June Lake Highlands Specific Plan, which is part of the West Village/Rodeo Grounds area in the JL Area Plan. **Response:** Intrawest will submit an application to the USFS related to off-site improvements. Intrawest has submitted a conceptual Tree Retention Plan (Figure 1.f) as part of its Specific Plan application. We do not know which trees will be removed within the Specific Plan area. Therefore, it would be premature to show which trees will be removed or to provide a tree replacement plan. Instead, we will submit a tree replacement plan with each use permit application.

15. The snow storage figure from a previous plan was not included in the new application. Where will snow storage be located (must be clearly delineated on plans)? This is an important consideration in the June Lake area due to high precipitation potential and can not be put off until use permits. Per ordinance, June Lake requires 65% usable snow storage area (i.e., 65 sf for every 100 sf from which snow is to be removed). **Response:** The proposed snow storage plan is attached to the application as Appendix I.p.

16. Please provide the location and size of the construction staging area(s). **Response:** A construction staging area will be identified in the use permit application for any building.

17. In previous submittals a large parking structure was included. Is this still the case? The dimensions, square footage, height and architectural design of the parking structure are needed. **Response:** The Specific Plan application envisions that a parking structure would be a permitted use within LUD 2 (Multi-family). The dimension, square footage, height and architectural design will be determined through the use permit application process.
18. Please provide a detailed grading plan including streets, pathways, parking, retaining walls, construction areas, construction staging areas, cuts and fills, quantities. Typical cross sections should be shown for single-family, multi-family. **Response:** The applicant will provide this level of detail and specificity with its use permit applications for any particular phase of the development.
19. Tree-retention plan should be based on the grading plan and defensible space requirements. **Response:** Agreed. We will submit a more detailed tree retention plan with each use permit application.
20. Need street cross sections to show snow-storage easements, max slope on cuts and fills. Also, on all loop streets, pedestrian facilities (e.g., sidewalk walking paths) should be included at least on one side and separated from the street traffic. **Response:** Cross sections of the proposed Resort Core Loop, a Residential Street, and a Residential Drive are included on pages 35 to 37 in the Specific Plan application.
21. Describe how pedestrian facilities are going to be maintained, cleared of snow. **Response:** Section 11.2 of the application states that a project maintenance district and/or owners' association shall be established for the maintenance of public and common facilities within the Project Site, including "snow/ice removal and storage".
22. Access to the SCE parcel must be provided and clearly shown on the plan. A schematic substation layout is desired. **Response:** We will contact SCE and will develop a response to these requests.
23. For the most part, the Light Industrial designation is on steep, unusable hillsides and does not lend itself to industrial development. Consideration should be given to relocating. **Response:** Intrawest welcomes any recommendations from the CDD regarding the preferred size and location for the Light Industrial designation.

24. Each major phase of the development should be subject to a use permit process with design and architectural recommendation/review by the CAC. **Response:** Intrawest agrees with this concept, except that we do not believe that a use permit should be required for single-family homes.

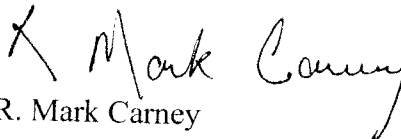
25. The Sustainability Matrix is a good start and interesting but many of the action items are not proposed in the submittal. **Response:** Intrawest notes in the introductory paragraph of the Sustainability Matrix that "all of the items included on this sustainability matrix that do not conflict with applicable regulations or requirements shall be considered for incorporation into the Rodeo Grounds Project". Therefore, all of the action items are "proposed" for consideration.

26. The Design Guidelines appear to be advisory and are not proposed in the submittal. Moreover, although the Guidelines "...are intended to establish an overall vision of the design and character of the Rodeo Grounds project," the overall vision is not clearly defined. Past concepts have promoted "Adirondack Camp"-is a theme contemplated? **Response:** The overall vision of the design and character of the Rodeo Grounds project is set forth in Section 1.0 of the Design Guidelines. The Design Guidelines do not contemplate restricting the design and character of projects within the Specific Plan area to any specific architectural theme.

Please contact me after the CDD has had the opportunity to review Intrawest's response to your letter. We look forward to receiving confirmation that Intrawest's Specific Plan application is now complete or further guidance from the CDD as to what additional information you may need. If you would like to meet in person to discuss the CDD's response, then I will be in Mammoth between January 12 and 14. If you have any comments or questions in the meantime, then please call me. Thank you for your continued courtesy and cooperation.

Sincerely,

LIEBERSBACH, MOHUN, CARNEY & REED


R. Mark Carney

CC: Larry Johnston
Mark Magit
Joe Walsh