

**NOTICE OF PREPARATION  
OF A TIERED ENVIRONMENTAL IMPACT REPORT FOR THE  
PROPOSED RECYCLED WATER DISTRIBUTION LINES PROJECT**



**LEAD AGENCY:** Mammoth Community Water District  
Post Office Box 597, Mammoth Lakes, California 93546

NOP Issued 2 May 2005

**RESPOND BY 3 JUNE 2005**

**A. INTRODUCTION**

Mammoth Community Water District (MCWD, or "the District") is proposing to construct a distribution system for the delivery of recycled water. As proposed, the initial increment of the distribution system would extend a distance of about 2 miles, from the MCWD headquarters (at Meridian Blvd. adjacent to State Route 203) to Sierra Star Golf Course (at Minaret Road just north of Meridian Road) with a connection to serve Snowcreek Golf Course (at Old Mammoth Road in the vicinity of Mammoth Creek).

The alignment of the proposed recycled water system would follow the existing Old Mammoth Sewer Interceptor Line (which is roughly parallel to the Mammoth Lakes Bike Trail System).

In addition to the distribution lines, the project would include improvements at Sierra Star Golf Course to (1) facilitate the application of recycled water to golf course turf, (2) permit the storage of reserve supplies in golf course water features, and (3) permit the continued application of well water supplies in locations where, and under conditions when, the use of recycled water is infeasible. Similar improvements are also anticipated at Snowcreek Golf Course, although MCWD anticipates that these improvements would be made by Snowcreek under separate approvals related to the expansion of their existing golf course from 9 to 18 holes. The

project would also include construction of a pump station at the Mammoth Lakes Wastewater Treatment Plant and possibly a booster pump station along the pipeline to convey the recycled supply over a distance of about 2 miles with an elevation gain of about 300 feet between MLWWTP and the Snowcreek and Sierra Star Golf Courses.

As Lead Agency for the project, MCWD has prepared an Initial Study and Environmental Checklist for the project proposal. Results of this review indicate that an Environmental Impact Report (EIR) will be required, because the proposed actions may be associated with potentially significant impacts on the environment. The forthcoming EIR will be prepared as a tiered document that links to the Reclaimed Water Project Final EIR/EA certified in 1998 for the overall Reclaimed Water Program.<sup>1</sup>

Given this background, MCWD invites your comments on the scope and content of environmental information to be presented in the forthcoming EIR. MCWD also seeks to know of applicable permit and review requirements of your agency for the proposed project.

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<sup>1</sup>CEQA §15152 states that tiering is appropriate where a CEQA document has been prepared to consider the broad policy issues associated with an overall program, allowing later CEQA documents to focus on more detailed site-specific project proposal. The scope of later assessments is limited to potential impacts, mitigations or alternatives that were not examined in the earlier review.

Please mail, fax or e-mail your response to the address shown below, and include the name, telephone number and address of a contact person so that we can follow up if questions arise.

MCWD c/o Sandra Bauer  
Bauer Planning & Environmental Svcs., Inc.  
220 Commerce, #200 ♦ Irvine, CA 92602  
Tel: 714.508.2522 Fax: 714.508.2113  
e-mail: [bauer7@earthlink.net](mailto:bauer7@earthlink.net)

Due to the time limits mandated by state law, **your response to this Notice of Preparation (NOP) must be sent at**

**the earliest possible date and no later than 3 JUNE 2005** (30 days from receipt of this notice). The schedule calls for the draft EIR to be distributed for public review during the summer of 2005. If you have any questions, please feel free to contact Ms. Bauer.

**B. NOP CONTENTS**

This NOP contains twelve sections addressing the proposed project and forthcoming EIR. The sections are identified in Table 1 below.

**Table 1  
NOTICE OF PREPARATION CONTENTS**

- |                                       |   |
|---------------------------------------|---|
| A. Introduction                       | G. Project Alternatives & Related Actions |
| B. NOP Contents                       | H. Scoping & Environmental Factors        |
| C. Project Location                   | I. NOP Distribution List                  |
| D. Project Background                 | J. Environmental Checklist                |
| E. Project Proposal, Purpose, Phasing | K. Discussion of Checklist Responses      |
| F. Responsible Agencies               |   |

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**C. PROJECT LOCATION**

MCWD provides water and sanitation services to a service area located within the boundaries of the Town of Mammoth Lakes, in the southwestern part of Mono County, California. The District and the Town are surrounded by National Forest lands administered by the United States Forest Service (USFS). Principal streets in the study area include State Highway 395 (a major north-south state highway), State Route 203 (SR 203, the major arterial through the study area), Meridian Blvd. (all of the existing and proposed MCWD facilities are located just southeast of the intersection of Meridian Blvd. at SR 203), Old Mammoth Road (the primary commercial corridor), and Minaret Road (Sierra Star Golf Course is located at the northwest intersection of Minaret and Meridian). A regional

location map is provided as Exhibit 1. Exhibit 2 shows the MCWD service area in relation to the Town boundaries and other areas considered in this NOP.

**D. PROJECT BACKGROUND**

The proposed project has its recent origins in the 1991 approval of the Sierra Star Golf Course (then known as "Lodestar") by the Town of Mammoth Lakes. The approval included a requirement that recycled water or other non-potable supplies be used for golf course irrigation, if available.

Following the Town's action, the MCWD Board of Directors approved the concept of upgrading MLWWTP to tertiary treatment, suitable for providing recycled water. In 1996, the District initiated an environmental review to examine effects

of the Plant upgrade, as well the diversion to recycled water customers of a portion of the water now discharged into Laurel Pond. The EIR/EA was completed with a finding that no significant unavoidable adverse effects would result, provided certain mitigation measures were implemented. The measures included (1) maintaining Laurel Pond at no less than 18 areas in size, (2) use of Best Management Practices to prevent erosion and sedimentation during earthwork, and (3) monitoring to ensure the continued habitat value of the Jarvis Tinsley Pilot Wetland Mitigation Site. The Board of Directors certified the EIR, adopted all mitigation measures, and approved the recycled water project in October 1998.

The approval included modifications at MLWWTP to provide tertiary treatment for up to 1.55 million gallons per day (mgd) of effluent, and construction of an effluent pumping station to provide an energy source for conveyance of the tertiary treated water, but did not include construction of a distribution system to deliver the recycled product. The current NOP and forthcoming EIR are addressed to the environmental effects associated with construction of the recycled water distribution system, based on the project framework and environmental information set forth in the 1998 Final EIR/EA per CEQA §15152.

#### **E. PROJECT PROPOSAL AND PHASING**

**PROJECT PROPOSAL:** The project would involve construction of the first increments of a distribution system to deliver recycled water in the Mammoth Basin. The system examined in this MND would deliver an estimated 250 acre-feet per year (AFY) of recycled water to Sierra Star Golf Course, and about 210 AFY to the Snowcreek Golf Course development. All recycled water

deliveries would be limited to the summer irrigation season (generally May through September).

The District anticipates that there may be future extensions and connections, but none are proposed at this time. Future extensions and connections would be subject to separate CEQA compliance as appropriate. This MND does, however, consider the cumulative effects associated with long-term use of the full 1.55 mgd of tertiary treated effluent in the Mammoth watershed, and will also consider potential future uses as part of the alternatives and cumulative impact assessments.

**Sierra Star Golf Course:** Sierra Star Golf Course is an existing operational facility that intends to use the recycled water supply exclusively for golf course irrigation; no other on-site or off-site uses are contemplated at this time. Golf course irrigation is currently supplied from untreated, non-potable water wells owned by MCWD.

All major elements of the recycled system have been integrated into the planning and development of the golf course site. The major elements include a lined main recycled water storage basin/lake feature and internal connections to convey the recycled supply. Sierra Star anticipates that its peak demand, during the hottest and driest part of summer, will average 650,000 gallons per day. Use of the recycled supply is expected to begin in May and continue through September.

**Snowcreek Golf Course:** The Snowcreek Golf Course is also an existing operational facility that currently offers 9 holes for golf play. Snowcreek has recently completed a land exchange with the U.S. Forest Service that will allow expansion of another 9 holes for a complete 18-hole facility. Golf Course

irrigation is currently supplied through one private well with a production capability of 200 gallons per minute with supplemental untreated well water supplied by the District. Snowcreek is located outside of but directly adjacent to the MCWD service area.

The proposed recycled system at Snowcreek Golf Course would be integrated into development planning for the expanded golf course site. Major elements are expected to include a main recycled water storage basin/lake feature and internal connections to convey the recycled supply. Snowcreek anticipates that its peak demand, during the hottest and driest part of summer, will be in the range of 0.6 mgd, with an estimated overall annual demand of 210 AFY (about 0.5 mgd). No demand is foreseen from October through April.

**Distribution System Alignment:** The alignment proposed for the new recycled pipeline parallels the Mammoth Lakes Bike Trail System from MLWWTP to Old Mammoth Rd. At Old Mammoth Rd., a pipeline to serve Snowcreek Golf Course would be constructed southward across Mammoth Creek (using trenchless construction at the Old Mammoth Road crossing) and terminating at the Snowcreek Golf Course property line. The owners of Snowcreek Golf Course would be responsible for improvements inside of their facility boundaries (as well as any associated CEQA requirements), although all recycled water improvements outside of the property boundaries of the Snowcreek development area would be installed and managed by MCWD.

The pipeline to serve Sierra Star Golf Course would continue westward from Old Mammoth Rd., crossing Mammoth Creek Park to Meadow Lane, continuing to Minaret Rd. The alignment follows Minaret Road to Meridian Blvd., and

finally extends along Meridian Blvd. to Sierra Star Road, where it enters the Sierra Star Golf Course system.

The entire alignment is contained in existing (and previously-disturbed) road and trail alignments through the Town of Mammoth Lakes. The majority of the alignment is shown in open space or existing road rights-of-way. A short section will pass through a public park (Mammoth Creek Park) and residential cul-de-sac (Meadow Lane). Exhibit 3 depicts the alignment of the proposed recycled distribution system improvements, including the location of the take-out valve to provide future service to Snowcreek Golf Course.

**PROJECT PURPOSE:** MCWD's objective is to conserve potable water resources in the region through beneficial reuse of treated wastewater. The recycled supply would be used mainly for landscape irrigation, which represents a major demand on water supplies during the summer season.

**PROJECT PHASING:** MCWD has indicated a goal to initiate service to the Sierra Star and Snowcreek Golf Courses by the summer of 2007.

#### **F. RESPONSIBLE AGENCIES AND DISCRETIONARY ACTIONS**

**LEAD AGENCY:** MCWD is the designated Lead Agency for the project. In order to implement the project, the MCWD Board of Directors will be required to (1) certify the Final EIR indicating that environmental documentation has been prepared in compliance with CEQA; (2) approve the project proposal, (3) approve the Mitigation Implementation and Monitoring Program, if mitigation measures are required to reduce potential project impacts to a level that is less than significant, and (4) direct staff to file the Notice of Determination.

**RESPONSIBLE AGENCIES:** In addition to the Lead Agency project approvals described above, the MND will be used by other public agencies that will consider separate permits and approvals required before the project can be

implemented. Table 2 identifies the anticipated responsible agencies and approvals associated with the proposed construction and operation of a Recycled Water Distribution System.

**Table 2**  
**LEAD AGENCY, RESPONSIBLE AGENCY, and TRUSTEE AGENCIES**  
**DISCRETIONARY ACTIONS**

**Lead Agency: Mammoth Community Water District**

- Certification of the EIR
- Approval of the project proposal
- Adoption of the Mitigation Monitoring Program and Findings of Significant Effect
- Filing of the Notice of Determination and fees with the Clerk of Mono County

**Responsible Agencies**

Water Quality Control Board -- Lahontan Region (LRWQCB)

- Waste Discharge Requirements or NPDES Permits for Point Source Discharges
- Review of SWPPP for construction resulting in >5 acres of soil disturbance
- Construction in waters of the U.S. will require §401 Water Quality Certification

United States Forest Service

- Approval of Special Use Permits where the project enters USFS boundaries

State Water Resources Control Board (SWRCB)

- General NPDES Permit for construction resulting in >5 acres of soil disturbance

Department of Health Services (DOHS)

- Review and Comment on MND

United States Army Corps of Engineers (ACOE)

- §404 Individual Permit or Nationwide Permit if project elements involve excavation or fill in waters of the U.S.

Town of Mammoth Lakes (ML)

- Approval of Encroachment Permits where project elements enter public ROW

California Department of Transportation

- Approval of Encroachment Permits if project elements enter Caltrans' ROW

**Trustee Agency**

California Department of Fish and Game (DFG)

- 1601/1603 Agreement if project elements will alter an existing streambed

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**G. PROJECT ALTERNATIVES & RELATED ACTIONS**

**PROJECT ALTERNATIVES**

It is anticipated that the forthcoming EIR will consider at least two alternatives, including (1) delivery of recycled water supplies to other customers in the

Mammoth area. As noted previously, this alternative would be reviewed for future application only; no additional customers are proposed at this time. However, this alternative would consider future service to Shady Rest Park, local schools (for irrigation of ball fields), Mammoth Pacific (for the cooling of geothermal facilities), and others as

appropriate; and (2) Operational alternatives, including possible use of a dual pipeline system that could deliver supply to the golf courses and also drain supply from the courses back to the MCWD storage facilities (to provide enhanced water quality control) minimize or avoid water quality concerns. Other alternatives may be identified during project scoping and review.

## RELATED ACTIONS

The EIR will identify and describe related MCWD activities including temporary service to Mammoth Pacific L.P during 2001, ongoing preparation of the Mammoth Creek EIR, and other activities.

### **H. SCOPING CONSULTATION: ENVIRONMENTAL CONSIDERATIONS**

MCWD has had numerous meetings and discussions over the past several years with various agencies concerning the project proposal. In particular, the District has maintained close communication with Lahontan Regional Water Quality Control Board (LRWQCB) regarding the issues of water quality and relevant standards and objectives. Key points of these discussions are described in NOP §J (Discussion of Checklist Responses) and Attachment A (proposed thresholds of significance).

Additional scoping consultations will be undertaken during public review of this NOP. MCWD anticipates that scoping outreach will at a minimum include the Department of Fish and Game (DFG), the USFS, and the Town of Mammoth Lakes, as well as the LRWQCB. Any additional agency that wishes to participate in the scoping process is invited to contact Ericka Spies at MCWD (760.934.2596 x314) or Sandra Bauer (714.258.8055). Issues raised in scoping will be addressed in the forthcoming EIR.

An Initial Study and Environmental Checklist have been prepared to identify potentially significant environmental effects. Based on this review, as well as historical data and information gained through the scoping process to date, ***it has been determined that the proposed project may have significant environmental impacts with respect to one topical issue: Hydrology and Water Quality. It is proposed that the forthcoming EIR focus on this subject.***

The EIR will also address issues pertaining to construction impacts along the pipeline alignment (including impacts on recreational use of the Bike Trail, as well as construction traffic, noise, and air quality), and impacts on aesthetic and recreational values at the Golf Course (particularly related to use of lake features for the storage of recycled water). These impacts are anticipated to be less than significant.

Findings contained in the IS indicate there will be ***no significant impacts associated with the remaining environmental subject areas*** including (1) Topography, (2) Relevant Planning, (3) Traffic Conditions (apart from construction); (4) Air Quality (apart from construction), (5) Public Services, (6) Public Utilities; (7) Public Health/Safety; (8) Cultural Resources, (9) Hazards and Hazardous Materials, (10) Mineral Resources, (11) Population and Housing, (12) Geology and Soils, (13) Noise (apart from construction), (14) Recreation (apart from construction impacts and uses at the Golf Course), and (15) Growth-Inducing Impacts. ***It is proposed that these less-than-significant subjects be omitted from evaluation in the forthcoming EIR.*** The factors leading to a conclusion of "no impact" or "less than significant impact" for these subjects are described in §J of this NOP. As noted in the Introduction,

MCWD seeks to know your views concerning the proposed scope and content of information to be presented. **You are invited to review and comment on the preliminary**

**determinations contained in this IS regarding potentially significant and less-than-significant issues, and the proposed scope and focus of the EIR.**

## **I. NOP DISTRIBUTION LIST**

State of California (15xc)  
Office of Planning and Research  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

\*\*Town of Mammoth Lakes  
Post Office Box 1609  
Mammoth Lakes, CA 93546  
ATTN: William Taylor, Sr. Planner

Mammoth Cmty Water District (10xc)  
Post Office Box 597  
Mammoth Lakes, California 93546  
ATTN: Gary Sisson, General Manager

United States Forest Service  
Post Office Box 148  
Mammoth Lakes, CA 93546  
ATTN: Sandy Hogan

\*\*California Dept. of Fish and Game  
407 West Line Street  
Bishop, California 93514  
ATTN: Mr. Alan Pickard

\*\*Army Corps of Eng. Reg. Br. Field Off.  
2151 Alessandro Drive, Suite 255  
Ventura, California 93001  
ATTN: Environmental Review

\*\*U.S. Fish & Wildlife Service  
2493 Portola Road, Suite B  
Ventura, California 93003  
ATTN: Environmental Review

\*\*Lahontan Reg'l Wtr Qual Cnt Bd.  
2092 Lake Tahoe Blvd.  
South Lake Tahoe, CA 96150  
ATTN: Harold Singer, Exec. Dir.

\*\*Wtr Qual Cnt Bd.-Lahontan Rg.  
15428 Civic Drive, Suite 100  
Victorville, CA 92392  
ATTN: Cindi Mitton

Dept. Of Health Svcs.-Drnkng. Wtr. Brnch  
464 W. 4<sup>th</sup> Street, #437  
San Bernardino, CA 92401  
ATTN: Jay Das, Sr. Sanitary Engineer

Dave Wood Ranches  
770 "L" Street, #1150  
Sacramento, California 95814  
ATTN: Bill Thomas, Esq.

Valentine Reserve C/O SNARL  
Route 1, Box 198  
Mammoth Lakes, CA 93546  
ATTN: Dan Dawson

Bartkiewicz, Kronick & Shanahan  
1011 22nd Street, Suite 100  
Sacramento, CA 95816  
ATTN: Steve Kronick, Esq.

Mammoth Mountain Ski Area  
Post Office Box 24  
Mammoth Lakes, California 93546  
ATTN: Pam Murphy

Dempsey Construction  
Post Office Box 657  
Mammoth Lakes, California 93546  
ATTN: Linda Dempsey

\*\*State Water Res Control Bd  
Division of Water Quality  
1001 "I" St., 15<sup>th</sup> Floor  
Sacramento, California 95814

Mammoth Lakes Fire Department  
Post Office Box 5  
Mammoth Lakes, California 93546  
ATTN: Thom Heller

\*\*Great Basin Unified APCD  
157 Short Street, Suite 6  
Bishop, California 93514  
ATTN: Environmental Review

Mono Co. Admin. Offices/LAFCO  
Post Office Box 347  
Mammoth Lakes, CA 93546  
ATTN: Scott Burns

Caltrans District 9  
500 South Main Street  
Bishop, California 93514  
ATTN: Tom Dayak

Mammoth Lakes Public Library (2xc)  
Post Office Box 1120  
Mammoth Lakes, California 93546  
ATTN: Env. Public Documents

Sierra Club  
c/o Bryce and Wilma Wheeler  
Post Office Box 1973  
Mammoth Lakes, California 93546

Friends of the Inyo  
Post Office Box 64  
Lee Vining, California 93529

\*\* State Water Res. Cntrl. Bd.  
Div. of Clean Water Programs  
1001 "I" Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814  
ATTN: James Hockenberry

California Trout  
Post Office Box 3442  
Mammoth Lakes, California 93546  
ATTN: Robert Lusardi

**Legal Notices to be Published in:**

Mammoth Times/Review Herald  
Post Office Box 3929  
Mammoth Lakes, California 93546  
ATTN: LEGAL NOTICES

**J. ENVIRONMENTAL CHECKLIST**

*Project Title:* MCWD Recycled Water Distribution Project

*Lead Agency Name and Address:* Mammoth Community Water District, P.O. Box 597, Mammoth Lakes, CA 93546

*Contact Persons:* Ericka Spies, MCWD Environmental Specialist, 760.934.2596 x314; and Sandra Bauer, BPES Environmental Analyst, 714.258.8055

*Project Location:* Town of Mammoth Lakes, California

*Project Applicant's Name and Address:* See Lead Agency information

*General Plan Designation:* Varied

*Zoning:* Varied

*Description of Project:* Please refer to §E (Project Description).

*Surrounding Land Uses and Setting:* Please refer to §C, Project Location.

*Responsible and Trustee Agencies:* Please refer to §F, Discretionary Actions.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, including at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Risks & Hazardous Materials            |
| <input type="checkbox"/> Air Quality                        | <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Transportation and Traffic             |
| <input type="checkbox"/> Geology/Soils                      | <input type="checkbox"/> Cultural Resources     | <input checked="" type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Noise                              | <input type="checkbox"/> Mineral Resources      | <input type="checkbox"/> Utilities and Service Systems          |
| <input type="checkbox"/> Recreation                         | <input type="checkbox"/> Public Services        | <input type="checkbox"/> Population and Housing                 |
| <input type="checkbox"/> Mandatory Findings of Significance |   | <input type="checkbox"/> Land Use/Planning                      |

## EVALUATION OF ENVIRONMENTAL IMPACTS:

	Potential Impacts Will Be Evaluated in PEIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Beneficial Impact
<b>I. AESTHETICS:- Would the project:</b>				
a) Adversely impact a scenic vista or highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Damage scenic resources (trees, rock outcrops, historic buildings, a state scenic highway)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>II. AGRICULTURE RESOURCES: Would the project:</b>				
a) Convert Prime or Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with agricultural zoning or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes that could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>III. AIR QUALITY: Would the project:</b>				
a) Obstruct implementation of an air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate an air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Cause a considerable increase of any criteria pollutant for which the region is non-attainment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to pollutants?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IV. BIOLOGICAL RESOURCES: Would the project:</b>				
a) Have a substantial adverse effect on any candidate, sensitive, or special status species?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Adversely impact protected wetlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potential Impacts Will Be Evaluated in PEIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Beneficial Impact
d) Interfere with the movement of any native resident or migratory fish or wildlife species?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with provisions of a Habitat Conservation or Natural Community Conservation Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**V. CULTURAL RESOURCES:- Would the project:**

a) Cause an adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause an adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic or paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**VI. GEOLOGY AND SOILS: Would the project cause or be impacted by:**

a) Seismic Impacts including:				
i) Rupture of a fault delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Ground failure including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantial soil erosion or loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Unstable geologic materials or soils?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expansive soils?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**VII. HAZARDS & HAZARDOUS MATERIALS: Would the project:**

a) Create a hazard through transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a hazard through reasonably foreseeable upset and accident conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Involve use of hazardous materials within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potential Impacts Will Be Evaluated in PEIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Beneficial Impact
d) Be located on a site that is included on a list of hazardous materials sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Would the project cause a hazard to residents or workers within 2 miles of a public airport?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures to a significant risk involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**VIII. HYDROLOGY & WATER QUALITY: Would the project:**

a) Violate water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Deplete groundwater supplies or interfere with groundwater recharges?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Alter existing drainage patterns in a manner that would result in erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Alter drainage patterns or volumes in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create runoff above stormwater drainage capacities or generate polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place in a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IX. LAND USE AND PLANNING: Would the project:**

a) Physically divide or be incompatible with existing established land uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with applicable land use plan adopted to avoid or mitigate an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**X. POPULATION & HOUSING: Would the project:**

	Potential Impacts Will Be Evaluated in PEIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Beneficial Impact
a) Induce population growth directly (e.g. new homes, businesses) or indirectly (e.g., new road)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace existing jobs or housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XI. ENERGY &amp; MINERAL RESOURCES: Would the project:</b>				
a) Conflict with adopted energy conservation plans or use energy in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XII. NOISE: Would the project result in:</b>				
a) Expose people to noise levels above standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose people to excessive vibration or noise?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A permanent increase in ambient noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A temporary or periodic increase in noise?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) If within 2 miles of a public airport, would the project expose people to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) If in the vicinity of a private airstrip, would the project expose people to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIII. TRANSPORTATION/TRAFFIC: Would the project:</b>				
a) Cause a substantial increase in traffic?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed a road or highway level of service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Change air traffic patterns?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Cause hazards due to design (sharp curves) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted alternative transportation plans (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potential Impacts Will Be Evaluated in PEIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Beneficial Impact
<b>XIV. PUBLIC SERVICES: Would the project require new facilities or services for:</b>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XV. UTILITIES &amp; SERVICES: Would the project:</b>				
a) Require new water or wastewater treatment facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require new storm water drainage facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Impact the sewer system or septic tanks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be served by a landfill with sufficient capacity to accommodate the project's waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVI. RECREATION: Would the project:</b>				
a) Increase use of parks or recreational facilities such that physical deterioration would occur?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require new or expanded recreational facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVII. MANDATORY FINDINGS OF SIGNIFICANCE: Does the project:</b>				
a) Have potential to degrade the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a sensitive plant or animal or eliminate important examples of California history?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**DETERMINATION** - On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have significant effect(s) on the environment, but at least one effect has been adequately analyzed in an earlier document pursuant to applicable legal standards, including mitigation measures based on the earlier analysis as described on attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

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*Signature*

*Date*

Sandra Bauer  
*Printed Name*

Mammoth Community Water District  
*For*

**K. DISCUSSION OF RESPONSES TO CHECKLIST ITEMS**

**I. AESTHETICS. Would the proposal:**

*a-d) Impact or damage a scenic vista or highway? Degrade visual character of an area? Create new light or glare?*

**LESS THAN SIGNIFICANT IMPACT.**

The current and proposed Town of Mammoth Lakes *General Plan* note that there are scenic resources throughout the Mammoth area, and points to the importance of maintaining these resources as a factor in attracting visitors and residents. The *General Plan* discourages development on or near visual features as well as actions that would remove or diminish viewsheds, and encourages the selection of location, design and construction materials that would reduce potential impacts on scenic resources.

The proposed pipeline alignment is well removed from the SR 203 scenic corridor, but does follow the alignment of a designated bicycle trail and crosses Mammoth Creek in the vicinity of Old Mammoth Road. Accessibility and scenic values along this trail system would be adversely impacted during the construction effort. Since the pipeline would be buried underground, and the construction area fully restored to pre-construction condition, the aesthetic impacts would terminate when the construction effort is completed. The forthcoming EIR will describe aesthetic values along the trail alignment and the steps to be taken by MCWD to ensure that scenic values are unimpaired following construction.

Storage of recycled water in the lake features may impact aesthetic values at Sierra Star and Snowcreek Golf Courses. The forthcoming EIR will evaluate the potential impact on aesthetic values at the golf courses.

**II. AGRICULTURE. Would the project:**

*a-c) Convert Prime Farmland or Farmland of Statewide Impor-*

*tance to non-agricultural use?  
b) Conflict with agricultural zoning or a Williamson Act contract? c) Otherwise convert Farmland to non-agricultural use?*

**NO IMPACT.** Land uses within the project area are governed by the 1987 Town of Mammoth Lakes *General Plan* (currently being updated). Neither the 1987 General Plan nor the current General Plan update identifies agriculture as a land use in the planning area.

The Town adjoins large areas of public lands managed by the U.S. Forest Service. Land uses within this area are governed by the 1988 USFS *Land and Resource Management Plan*, which identifies a total of 20 management areas. The project site is part of Management Area No. 9 ("Mammoth"), which contains portions of two grazing allotments. None of the allotments enter into the area proposed for recycled water use or conveyance facilities, and this topic is not proposed for further assessment in the forthcoming EIR. The forthcoming EIR will, however, examine compliance with previously adopted mitigation measures and agreements concerning Laurel Pond as discussed more fully under §IV below (Biological Resources).

**III. AIR QUALITY. Would the project:**

*a-e) Obstruct implementation or violate an air quality plan or standard? Expose sensitive receptors to pollutants? Create objectionable odors?*

**LESS THAN SIGNIFICANT IMPACT.**

The site is in the Great Basin Air Basin. Climatic conditions are dominated by the interaction of west-to-east weather patterns with the north/south alignment of the Sierra Nevada. The basin is in a severe "rain shadow" that creates very low precipitation levels. Precipitation in Bishop averages 5.6" per year. Precipitation increases north of Bishop with increasing elevation, and averages about 10" per year in Mammoth Village.

The dry climate and strongly funneled winds in Owens Valley lead to occasionally severe dust storms, particularly in the southern basin. Such storms sometimes create levels of respirable particulate matter (PM-10) that exceed state and federal PM-10 levels by a wide margin. In addition to high particulate pollution during strong wind events, cold air pooling with side canyons of the Sierras, such as at Mammoth, leads to very strong winter inversion conditions that trap air pollution. During cold periods, wood smoke from residential fireplaces and stoves may create a thick layer of haze that causes PM-10 standards to be exceeded at Mammoth.

Limited measurements of gaseous air pollution have shown that the types of air pollutants found in more developed areas of California do not occur in significant levels in the Owens Valley/Great Basin. Although the strong winter inversions and poor vehicular operating conditions during cold weather lead to elevated levels of carbon monoxide in the Mammoth area, they are not at levels that exceed clean air standards.

Construction Impacts

Construction dust is a potential concern because of the non-attainment status of the air basin. Dust generation depends on the size of the disturbance "footprint." PM-10 generation during construction with "standard" dust control measures (mainly periodic watering) is around 25 lbs/day/acre under construction. As the project construction area would comprise no

more than one acre in any given period the daily PM-10 generation rate would be well below any threshold of significance. Heavy equipment used in construction would likely involve a backhoe, loader, and cement trucks. The limited project area in any construction segment would restrict the amount of equipment in operation. A daily equipment energy consumption of 5,000 Brake-Horsepower-Hours (BHP-HR) is a reasonable maximum activity level. For a typical California construction fleet, this would result in the daily emissions shown in Table 3.

Although there are no significance thresholds for emissions in the air basin, the above levels are lower than those used in a basin where air pollution problems are much more severe than in Mammoth. Given that peak daily levels are less than a representative significance threshold, and given that most construction would occur during the daytime in warmer months with lower baseline pollution levels, construction activity impacts are considered less than significant.

Operational Impacts

Operational activities have minimal direct air emissions, limited primarily to the electricity required to move the water through the pipeline system from the treatment plant to the Golf Course (an elevation gain of about 300 feet). For purposes of comparison, Table 4 shows the emissions that would be associated with a power usage of 10,000 kilowatt-hours from a fossil-fueled power plant.

**Table 3  
CONSTRUCTION EMISSIONS FORECAST<sup>2</sup>**

<u>Pollutant</u>	<u>Forecast Emissions</u>	<u>Significance Level</u>
Carbon Monoxide	9.5 lbs/day	550 lbs/day
Reactive Organic Cmpnds	3.0 lbs/day	75 lbs/day
Nitrogen Oxides	43.0 lbs/day	100 lbs/day
Sulfur Oxides	3.0 lbs/day	150 lbs/day
Exhaust Soot (PM-10)	1.5 lbs/day	150 lbs/day

<sup>2</sup> SCAQMD CEQA Air Quality Handbook (1993)

**Table 4  
CONSTRUCTION EMISSIONS FORECAST**

<u>Pollutant</u>	<u>Emissions</u>
Carbon Monoxide	2.0 lbs/day
Reactive Organic Cmpnds	0.1 lbs/day
Nitrogen Oxides	11.5 lbs/day
Sulfur Oxides	1.2 lbs/day
Exhaust Soot (PM-10)	0.4 lbs/day

The emission levels shown in Table 4 are again much lower than the representative significance threshold identified in Table 3. Air quality impacts from project implementation and operation are also thus considered less than significant. Based on the foregoing considerations, no further analysis of air quality standards is proposed in the forthcoming EIR.

**IV. BIOLOGICAL RESOURCES. Would the project impact:**

*a,d,e) Impact a candidate, sensitive or special status species? Locally designated species or natural communities? Wildlife dispersal or migration corridors?*

**NO IMPACT.** The pipeline alignment and golf course improvements are proposed on lands that have been previously disturbed for trail, road and recreational improvements. No portion of the alignment is proposed to enter into undeveloped property, or require removal of native habitat. No further examination of impacts to sensitive species is proposed with respect to biological impacts of the proposed recycled water distribution pipelines or golf course irrigation systems.

*b,c) Adverse impact a riparian or wetland habitat?*

**LESS THAN SIGNIFICANT IMPACT.** To provide a connection to Snowcreek Golf Course, a distribution pipeline is proposed to cross Mammoth Creek in the vicinity of Old Mammoth Road. MCWD plans to utilize 'trenchless' construction techniques for this crossing, or an elevated pipeline that is integrated into the roadway bridge. No

direct impacts on wetlands habitat are foreseen, and no further assessment of impacts to wetland habitat is proposed.

As noted previously, about 90% of the Sierra Star golf course drains into Murphy Gulch, and the remaining area drains directly to Mammoth Creek. Use of the reclaimed supply at the Golf Course may indirectly impact these resources. These indirect effects would be evaluated as part of the analysis of hydrology and water quality, consistent with LRWQCB requirements.

*f) Conflict with a Habitat Conservation Plan?*

**LESS THAN SIGNIFICANT IMPACT.** As part of the *Reclaimed Water Project Final EIR/EA*, MCWD adopted the following mitigation measure: *"MCWD shall obtain a measurement during the month prior to initiating the first diversion from Laurel Pond to a recycled water customer. Measurements shall continue on a regular monthly basis thereafter, including both the irrigation and non-irrigation seasons. Each contract with a recycled water customer shall be signed prior to delivery of recycled water to that customer, and each contract shall contain a clear statement that recycled water deliveries are contingent on maintenance of a minimum area of 18 acres at Laurel Pond."*

Additionally, USFS and MCWD are parties to a Memorandum of Agreement (MOA) that notes the joint goal of maintaining quality waterfowl habitat at Laurel Pond. During the collaboration between USFS and MCWD concerning the Reclaimed Water

Project, it was concluded that Laurel Pond would benefit from preparation of a comprehensive Habitat Management Plan (HMP). The need for an HMP is not directly related to (and in fact predates) the Reclaimed Water Project, and therefore the HMP was not incorporated as a Mitigation Measure for that project, but is intended to maintain quality waterfowl habitat at Laurel Pond and may include such elements as relocation of the effluent outfall; fencing of the wet meadow; establishment of a seed bank; and other components. Decisions regarding these and other possible options will be made after MCWD has obtained relevant project permits from LRWQCB (i.e., after the current project), and will include input from other agencies include the California Department of Fish and Game. The forthcoming tiered EIR will describe but not evaluate the history and goals set forth between MCWD and USFS for Laurel Pond.

**V. CULTURAL RESOURCES. Would the project:**

***a-d) Impact an historical, paleontological or archaeological resource? Impact human remains?***

**LESS THAN SIGNIFICANT IMPACT.**

The Mammoth Lakes area is part of the Western Great Basin, a region for which archaeological resources are well known and characterized by significant historic economic, trade and social patterns. All project improvements at MLWWTP and at the Golf Courses would occur in areas that have been previously disturbed. Resources on these sites would have been scattered or lost as a result of prior earthwork activities and no examination of cultural resources is proposed for the MLWWTP site or for the Sierra Star or Snowcreek Golf Courses.

From Old Mammoth Road to the golf course, the pipeline alignment is proposed to be sited within developed roadway rights of way. The eastern portion of the alignment would parallel land that has been previously disturbed for the Mammoth Creek Bike Trail. However, those improvements did not

require significant earthwork. The potential exists for subsurface artifacts to be uncovered along this portion of the pipeline alignment.

The forthcoming EIR will provide a mitigation measure requiring that MCWD retain a licensed archaeologist/paleontologist to monitor grading and earthwork activities along all pipeline segments between MLWWTP and Old Mammoth Road. The mitigation will also require that any cultural materials encountered shall be evaluated by the archaeologist/paleontologist and, if warranted, a plan developed prior to further ground disturbing activities in the area where the resources were found. Apart from these mitigation measures, no further assessment is proposed in the forthcoming tiered EIR

**VI. GEOLOGY & SOILS. Would the project be impacted by:**

***a) Seismic impacts including fault rupture, strong seismic shaking, ground failure or landslides?***

**LESS THAN SIGNIFICANT IMPACT.**

As noted in the Town *General Plan*, the Mammoth Lakes area has a long history of seismic activity and six known active faults are located in the region. The Mammoth area experienced an increase in the frequency and intensity of seismic activity between 1978 and 1983. During this time, three quakes exceeded 6.1 on the Richter Scale, and several major swarms occurred along the Laurel-Convict Fault in the vicinity of Laurel Pond. Factors contributing to local seismicity include a high degree of crustal faulting around Mono Lake and Long Valley and the movement of magma beneath the Long Valley Caldera. Several designated Alquist-Priolo Special Study zones extend into the Town boundaries, and numerous additional zones are designated in adjacent unincorporated areas.

The proposed pipelines and improvements undertaken at Sierra Star and Snowcreek Golf Courses would almost certainly be exposed to repeated seismic activity over the life of

the project. However, the potential effects associated with this exposure would be mitigated to a level that is less than significant through compliance with relevant building codes. It is not proposed that the forthcoming EIR examine seismicity.

Liquefaction and slope instability are among the secondary hazards associated with seismic activity. As noted in the Town *General Plan*, a number of areas throughout the Mammoth region are characterized by shallow groundwater and/or alluvial soils, both of which are indicators of liquefaction potential. The proposed pipeline alignment would pass through several areas known to have both shallow groundwater and finer ground alluvial soils, indicating that liquefaction potential may be comparatively high. The resulting potential effects would be mitigated through compliance with relevant building and grading codes.

Landslides and slope instability are largely limited to the slopes that exceed a 30% gradient, particularly in areas with significant accumulations of loose rock. The improvements (including pipeline segments and facilities at the golf course) would not be sited in areas of steep slopes, and problems with slope instability are not anticipated. Furthermore, all soils engineering and construction techniques would be mitigated through compliance with relevant building and grading codes. No further examination of seismic ground failure, landslides or subsidence is proposed.

***b-d) Erosion, changes in topography or unstable soil conditions from excavation, grading or fill? Expansive Soils?***

**LESS THAN SIGNIFICANT IMPACT.** Soils of the Mammoth region (including alluvial deposits, unconsolidated outwash, glaciated granites, pumice, and related materials) have a moderate-to-high erosion potential consistent with their volcanic and seismic origins. All pipeline improvements and facilities associated with the proposed recycled water

project would be conducted in compliance with relevant building codes, and no further evaluation is proposed in the forthcoming EIR.

The Mammoth area receives snowfall levels of 200+ inches per year, and is subject to a number of related hazards including avalanches and snow shedding. The proposed pipeline and golf course facilities are located well away from designated avalanche hazard zones (which are largely confined to steeper mountain slopes). Potential effects of snow shedding would be mitigated through proper design standards, as determined by the Town in evaluating building code compliance, and through MCWD maintenance programs. No further evaluation is proposed in the forthcoming EIR.

## **VII. HAZARDS. *Would the project:***

***a-d) Create a hazard through transport, use or disposal of hazardous substances? Be located on a hazardous materials site?***

**LESS THAN SIGNIFICANT IMPACT.** No toxic chemicals or hazardous substances are associated with the pipeline improvements or with the improvements proposed at Sierra Star Golf Course. It is anticipated that use of recycled water supply would result in modifications to the use of fertilizers at both golf courses; this topic will be examined in the EIR assessment of water quality. Proposed improvements would not be associated with a substantive risk of accidental explosion or release of hazardous substances, and no further evaluation of this topic is proposed in the forthcoming EIR.

***e-f) Cause a hazard to residents or workers within 2 miles of a public airport? Impair implementation of an adopted emergency response plan or evacuation plan?***

**NO IMPACT.** Please refer to the discussion under Transportation. No additional discussion is proposed.

**g) Expose people or structures to risk of wildland fire?**

**NO IMPACT.** All of MCWD's facilities, including pipelines and pump stations, are designed and maintained to minimize fire hazard. Fuel loading around District facilities is removed on a regular basis, and all buildings are constructed of cinder block (no wood frame construction). No further analysis of fire hazard is proposed in the forthcoming EIR.

**VIII. HYDROLOGY & WATER QUALITY. Would the project:**

***a,c,d,f) Violate water quality standards or waste discharge requirements? Alter drainage or runoff patterns, or change absorption rates? Discharge into surface waters or change surface water volume in a water body? Otherwise degrade water quality?***

**POTENTIALLY SIGNIFICANT IMPACT.** If the project is approved and implemented, a portion of the effluent currently sent to Laurel Pond would be discharged at Sierra Star and Snowcreek Golf Courses.

The improvements to accommodate recycled water at Snowcreek Golf Course would be made as part of the planned 9-hole expansion at that facility, where all golf features and elements would be designed to accommodate LRWQCB requirements for containment. MCWD may also provide recycled supplies to the existing 9-hole course, which would require that adequate distance be maintained to existing production wells in that area.

The Sierra Star Golf Course is a fully built facility, and the recycled water system must be adapted to the existing design. Drainage at the Sierra Star golf course follows in a northeasterly direction along three natural drainages. About 90% of the site drains into Murphy Gulch; the remaining area drains directly to Mammoth Creek.

Murphy Gulch is an ephemeral drainage, dry through most of the year but flowing during periods of rainfall and snowmelt runoff. Murphy Gulch drains into Mammoth Creek near the intersection of Highways 203 and 395, about 2-2.5 miles east of Sierra Star golf course. The Town of Mammoth Lakes has installed an earthen dam/desilting basin across Murphy Gulch, and plans to install two additional dam features. Because Murphy Gulch is tributary to Mammoth Creek, the LRWQCB has previously recommended that Murphy Gulch be found a surface water of the United States in its own right.

The *Basin Plan* contains two prohibitions that apply to the land on and around Sierra Star Golf Course. Prohibition #1 prohibits the discharge of waste to surface water above the 7,200-foot elevation, and Prohibition #4 prohibits the leaching and percolation of waste above the 7,650-foot elevation.

In scoping communications with LRWQCB, staff members have indicated that Prohibition #4 (concerning the leaching and percolation of waste above the 7,650-foot elevation) would not apply to the current project. Staff has also indicated that it may be possible to obtain an exemption from Prohibition 1, provided that the Board makes a finding that the exemption would not result in an adverse impact to water quality or beneficial uses. The forthcoming EIR will provide a detailed analysis of potential project impacts with respect to water quality and beneficial uses, including the relationship between use of recycled water and applied fertilizers. The proposed approach to this assessment, including potential thresholds of significance, is outlined in Attachment A to this NOP.

Implementation of the recycled water project would reduce the quantity of treated effluent discharged into Laurel Pond. This was among the key issues addressed in the 1998 MCWD *Final EIR for the Reclaimed Water Project*, which established the basis for the current tiered review. That document

concluded that discharges to Laurel Pond could be reduced without significant adverse effect, provided pond area was not allowed to fall below 18 acres. No further assessment of this topic is proposed in the forthcoming EIR.

**b) Deplete groundwater supplies or interfere with groundwater recharge capability?**

**POTENTIALLY SIGNIFICANT IMPACT.** Treated effluent from the MLWWTP is currently discharged into Laurel Pond, about 3 miles down-gradient of the MCWD service area. If the proposed project is approved and implemented, a portion of the effluent currently sent to Laurel Pond would be discharged at the golf course sites. Laurel Pond is located in the same groundwater basin as these golf courses and it is therefore not anticipated that the project would significantly reduce the volume of water entering the Mammoth Basin. This impact may be influenced, however, by the application procedures employed at Sierra Star Golf Course. The EIR will examine potential impacts on groundwater flow, quantity and quality, including subsurface geologic conditions and groundwater flow downgradient of the golf courses.

**(e) Create runoff above stormwater drainage capacities?**

**POTENTIALLY SIGNIFICANT IMPACT.** As discussed in the Project Description, a portion of the recycled water supplies delivered to Sierra Star golf course are proposed to be stored in an existing main water storage basin/lake feature, and several smaller golf course water features may also be used to store and regulate the use of smaller quantities of recycled water. One of the issue areas identified by the Lahontan Regional Water Quality Control Board staff concerns identification of the design capacity within the storage/lake features. In particular, the Regional Board wants to verify that storm flow capacities are adequate to support the exemption to the prohibitions as noted in Item IV (a)

above. The forthcoming EIR will evaluate potential project impacts with respect to storm flows and design capacities of the retention basins.

The project area is not subject to tsunami or mudflows, and these impacts are not proposed for further review in the forthcoming EIR.

**(g-i) Place structures or people in a 100-year flood zone?**

**LESS THAN SIGNIFICANT IMPACT.** According to the ESRI-FEMA Flood Hazard maps, the 100-year flood hazard areas in Mammoth Lakes are confined to narrow corridors along portions of Mammoth Creek and Murphy Gulch (only in the vicinity of Hwy. 395). The proposed project would not impact the flood zone boundaries for either drainage.

**j) Cause inundation by seiche, tsunami, volcanic hazard?**

**LESS THAN SIGNIFICANT IMPACT.** The study area is not located adjacent to large water bodies capable of generating tsunamis or seiches, and no impacts are anticipated with respect to these hazards. However, the region has experienced volcanic activity for an estimated 3.2 million years, and recent formation of a resurgent dome in the Long Valley Caldera indicates that volcanic forces are still active. Studies conducted by USGS and the Division of Mines & Geology indicate that the region is potentially subject to a range of volcanic impacts including ash, falling blocks, basaltic rock fragments and pyroclastic flows. The State has developed a *Volcanic Hazards Response Plan* detailing actions to be taken in the event of volcanic activity in the region.

Proposed project improvements would not affect the probability of volcanic activity. The pipeline and other project improvements may be exposed to volcanic activity over the life of the project, but these effects would be mitigated through compliance with relevant building codes and/or implementation of identified emergency response actions. It is not proposed

that the forthcoming EIR examine seiche, tsunami or volcanic activity.

**IX. LAND USE AND PLANNING. Would the proposal:**

**a) *Physically divide or be incompatible with the existing community?***

**LESS THAN SIGNIFICANT IMPACT.**

The recycled water pipeline would be buried and wholly out of view, and there would be no surface physical elements along the pipeline route that would divide neighborhoods or other community elements. Although no significant adverse impacts are anticipated, the forthcoming EIR will describe and evaluate potential impacts along all segments of the proposed construction alignment.

On a short-term basis, construction of the delivery pipelines would disrupt land uses along the proposed alignment. Construction is regulated by a variety of local and state codes and standards that would minimize the scope of disruption, and all land incompatibility impacts along the pipeline route would terminate upon completion of construction. Although no significant adverse impacts are anticipated, the forthcoming tiered EIR will describe and evaluate potential impacts to land uses along the proposed construction alignment.

**b) *Conflict with applicable zoning or land use designations?***

**NO IMPACT.** As discussed in the 1998 *Final EIR for the Reclaimed Water Project*, the Sierra Star (then known as "Lodestar") Golf Course was approved by the Town of Mammoth Lakes in 1995, with a requirement that golf course irrigation make use of recycled water or other non-potable water supplies. Currently the golf course draws its irrigation supplies from onsite wells producing non-potable water. Implementation of the proposed project would allow the golf course to reduce or eliminate the use of well water supplies in favor of recycled water as the irrigation supply.

In addition to the specific conditions of approval applied to Sierra Star Golf Course, the Town of Mammoth Lakes *General Plan* encourages MCWD to develop and use reclaimed and non-potable water supplies, and encourages developers to utilize these resources to the extent that they are available. The project would conform to planning guidelines for the golf courses as well as the District. No further examination of general plan and zoning consistency is proposed in the forthcoming EIR.

**X. POPULATION AND HOUSING. Would the proposal:**

**a) *Induce population growth either directly or indirectly?***

**LESS THAN SIGNIFICANT IMPACT.**

MCWD is a County Water District that has statutory responsibility for providing water and sanitation services to developments and customers within its service area, consistent with the land planning efforts of the relevant empowered planning agencies including the Town of Mammoth Lakes and the USFS. Consequently, the issue of potential growth inducement was examined in detail as part of the *Final EIR for the Reclaimed Water Project* (1998, op cit). The analysis concluded that the reclaimed water project would not have a significant impact on growth, and that the secondary and indirect effects would be consistent with the forecasts and planning goals contained in the Town of Mammoth Lakes' *General Plan*. No further analysis of this topic is proposed in the forthcoming EIR.

**b,c) *Displace people or housing, especially affordable housing?***

**NO IMPACT.** The westerly portion of the proposed pipeline alignment would be within streets that pass by several residential neighborhoods. The alignment would also cross through one residential cul-de-sac at Meadow Lane. However, no homes would be displaced, nor would residents be relocated. Project construction would be staged to minimize impacts to residential traffic, parking and access,

as will be described but not evaluated in the forthcoming EIR.

**XI. ENERGY/MINERAL RESOURCES.**  
**Would the proposal:**

- a) Conflict with adopted energy conservation plans or use energy in a wasteful manner?*

**LESS THAN SIGNIFICANT IMPACT.**

Operation of the pumping station would increase power demands associated with operation of MCWD facilities. The new pumping station would be powered by two new 50-horsepower pumps. The pumping capacity proposed to serve Sierra Star and Snowcreek Golf Courses is based on a net elevation gain of approximately 300-feet. This is comparable to the depth of wells that are now used to irrigate the golf courses (and would likely continue to be used in the event that the recycled project is not implemented). The associated energy costs are not anticipated to pose a direct or cumulative adverse impact on local power supplies, and no further evaluation of energy requirements is proposed in the forthcoming EIR.

The principal project objective is to conserve water resources through beneficial reuse. It is anticipated that project implementation would somewhat lessen the pressure on water resources in the Mammoth region, including groundwater and surface water supplies. No further evaluation is proposed for this topic.

- b) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?*

**NO IMPACT.** The Mammoth Lakes General Plan does not designate any areas of known mineral resource in the project area. No further examination of this issue is proposed.

**XII. NOISE. Would the proposal:**

- a-d) Exceed noise standards?  
Cause excessive vibration?*

***Permanently or periodically increase ambient noise levels?***

**LESS THAN SIGNIFICANT IMPACT.**

The project would generate short-term noise associated with project construction, and long-term impacts associated with operation of upgraded pumping station equipment at MCWD.

Short-term operation of construction equipment would involve variable noise impacts during improvement phases including very high levels on a periodic basis. However, these short-term impacts would entirely cease when construction is complete.

Operation of a new pumping station would produce a long-term increase in ambient noise levels in the surrounding area. However, MCWD facilities are located in an area designated by the Town of Mammoth Lakes for Industrial and Other Public land uses, for which MCWD facilities are a permitted use. Adjacent lands are also zoned for industrial and open space uses. There are no sensitive land uses in the vicinity of MLWWTP. The District would comply with construction and operational noise standards and regulations established in the General Plan *Noise Element*. Noise increases associated with the pump station are not expected to have an adverse effect on the environment, and no further consideration of noise is proposed in the forthcoming EIR.

- e,f) If within 2 miles of a public or private airport, would the project expose people to excessive noise?*

**NO IMPACT.** The project area is about 8 miles from the nearest airport and would neither cause nor be impacted by airport noise.

**XIII. TRANSPORTATION & TRAFFIC.**  
**Would the project:**

- a,b) Cause a substantial increase in traffic? Exceed a roadway level of service?*

**LESS THAN SIGNIFICANT IMPACT.**

During construction of the proposed pipeline improvements, there may be substantial construction traffic in the

vicinity of the segments under construction. The construction-related traffic impacts would be temporary in nature and traffic patterns would return to normal following completion of construction. Although no significant long-term adverse impacts are anticipated, the forthcoming EIR will examine the timing and location of impacts on circulation during the construction process and provide mitigation measures as needed to reduce these impacts to the extent feasible.

**c) *Change air traffic patterns?***

**NO IMPACT.** The Mammoth/Yosemite Airport is located 8 miles east of Town (outside of the study area) adjacent to State Highway 395. This airport offers scheduled commuter service to and from major population centers in the southwestern states, and is currently evaluating expansion plans that include service by a major air carrier. The project would have no impact on air traffic patterns.

**d) *Cause hazards from design features or incompatible uses?***

**LESS THAN SIGNIFICANT IMPACT.** Apart from the temporary construction impacts discussed in item (a) above, there would be no design features or incompatible uses associated with proposed project improvements. No further examination is proposed.

**e) *Inadequate emergency access or access to nearby uses?***

**LESS THAN SIGNIFICANT IMPACT.** Access to the Mammoth Lakes area is limited. The Town of Mammoth Lakes has identified emergency access as a key element of local transportation planning, and has developed a City-wide emergency evacuation plan. The Plan identifies Mammoth Scenic Loop as the major alternative road available to area residents. All elements of the project (including improvements at the District headquarters, the pipeline alignment and the golf courses) are readily accessible from SR 203, the main arterial through the Town of Mammoth Lakes, and can take access

from SR 203 to either Highway 395 or the Scenic Loop. MCWD emergency evacuation procedures are based on the plan developed by the Town of Mammoth Lakes. No further discussion of emergency access is proposed in the forthcoming EIR.

**f) *Insufficient parking capacity on-site or off-site?***

**NO IMPACT.** Following construction, no parking would be required along the pipeline alignment, and use of recycled water would result in a negligible demand for parking at the golf courses (limited to periodic maintenance and inspection visits). Parking facilities at MCWD are ample to meet the needs of employees, customers and suppliers. No additional consideration of parking is proposed in the forthcoming EIR.

**g) *Conflict with adopted alternative transportation plans?***

**LESS THAN SIGNIFICANT IMPACT.** Transit in the Mammoth area consists of charter lines and regional bus services, as well as local and Mammoth-to-Bishop shuttle services. Service schedules vary throughout the year in keeping with fluctuations in demand. Non-motorized transportation facilities have not been comprehensively planned for the region. In light of moderate to heavy bicycle use during the summer months, the Town of Mammoth Lakes has expressed interest in developing a plan to link activity nodes and highlight scenic resources.

During project construction, the trenching and associated traffic detours would interfere with the use of local pedestrian and bicycle paths. The impact would be most pronounced along the Mammoth Creek bicycle trail, which is the proposed alignment of the eastern portion of the pipeline. Potential impacts to this trail system will be examined in the forthcoming tiered EIR. The project would have no impact on air traffic, bus or shuttle services, and no additional consideration of these topics is proposed.

**XIV. PUBLIC SERVICES. Would the proposal impact or result in a need for any new government services?**

***a,c) Fire protection? Schools?***

**NO IMPACT.** The Fire Protection District has reported that uncertainty of the water supply is one of several key issues it faces in providing fire suppression services to the Community. Implementation of the recycled water distribution system is a key step toward increased reliability of local water supplies. The project would place no demand on school facilities since it does not generate user populations. No additional discussion of these topics is proposed in the forthcoming EIR.

***b,d,e) Police protection? Parks? Other services?***

**LESS THAN SIGNIFICANT IMPACT.** As a self-governing public agency MCWD is responsible for maintenance of its facilities; use of non-District public facilities and services is limited. Where appropriate, MCWD and the Town Council work together to coordinate overlapping regulatory activities. MCWD rarely requires service from the police department, and the impact of the proposed project on police and governmental services would not be significant. No additional discussion of these subjects is proposed in the forthcoming EIR.

**XV. UTILITIES & SERVICE. Would the proposal result in a need for new systems, or substantial alterations to the following utilities:**

***a) Require new water or wastewater treatment or distribution facilities?***

**NO IMPACT.** Project implementation is an outgrowth of MCWD's approval in 1998 of upgrades to the MLWWTP to provide for 1.55 mgd of tertiary treatment capacity. Apart from the pump station, no additional plant modifications would be required to implement this project and no further evaluation is proposed.

***b) Require drainage facilities?***

**POTENTIALLY SIGNIFICANT IMPACT.** The grading and repaving associated with pipeline improvements would necessitate temporary drainage diversions during construction. Over the long-term, pipeline design would incorporate drainage improvements consistent with code requirements. The Town of Mammoth Lakes has approved a storm drainage plan for the community that identifies potential flood hazard zones in the northeast and south-central areas of the Town. Neither the MLWWTP site nor the Sierra Star or Snowcreek Golf Courses are located in a High Flood Hazard Zone.<sup>3</sup> No further examination of these issues is proposed.

***c) Impact a sewer system or septic tanks?***

**LESS THAN SIGNIFICANT IMPACT.** Elimination of septic systems was a key objective when the Mammoth Lakes WWTP was approved and constructed in 1972, and there are only a limited number of septic systems within the MCWD service area at the present time (all granted exemptions by LRWQCB). MCWD provides water and sanitation services to a portion of the National Forest properties located outside of the MCWD service area, where some septic systems continue in operation. None of these systems would be impacted by the proposed project.

The existing MCWD treatment plant has sufficient tertiary treatment capacity to serve the proposed Sierra Star and Snowcreek golf courses, and MCWD is not proposing to expand the treatment facility at this time. No further assessment of sewer or septic systems is proposed in the forthcoming EIR.

***d) Solid waste disposal?***

**LESS THAN SIGNIFICANT IMPACT.** During construction, the project would generate construction debris requiring solid waste disposal, but this would end

<sup>3</sup> Source: Mammoth Lakes *General Plan*, op cit.

when the pipeline is in place. Solid waste disposal requirements would not be impacted by the long-term delivery of recycled water, or by the application of recycled water at Sierra Star and Snowcreek Golf Courses. No additional discussion of this topic is proposed.

**XVI. RECREATION. Would the project:**

***a,b) Increase the use of parks or recreational facilities? Require new or expanded parks?***

**LESS THAN SIGNIFICANT IMPACT.**

The Mammoth Lakes *General Plan* identifies three recreational facilities including the Community Center, the Whitmore site, and the town parks and playgrounds that are under a use permit from the Forest Service. None of these facilities would be impacted by the proposed pump station, the pipeline, or the improvements proposed at Sierra Star golf course.

During project construction, the trenching and associated traffic detours would interfere with the use of local pedestrian and bicycle paths. The impact would be most pronounced along the Mammoth Creek bicycle trail, which is the proposed alignment of the eastern portion of the pipeline. Potential impacts to this trail system will be examined in the forthcoming EIR. The project would have no impact upon air traffic, bus services, or shuttle services, and no additional consideration of these topics is proposed.

The project would support golf recreation at the privately-owned Sierra Star golf course. At the same time, storage of the recycled supply in scenic lake features may impact those recreational values. The forthcoming EIR will evaluate the impact of this project on recreation at the golf course.

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE: Does the project:**

***a) Have potential to degrade the environment, reduce fish or wildlife habitat or cause a***

***population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a sensitive plant or animal or eliminate examples of California history?***

**LESS THAN SIGNIFICANT EFFECT.**

Construction and operation of the recycled water distribution system will not substantially degrade habitat or fish and wildlife populations or limit the range or movement of any species. Furthermore, in accordance with commitments made as part of the Reclaimed Water Final EIR/EA, Laurel Pond would maintain its function as habitat for migrating waterfowl.

***b) Have significant cumulative effects?***

**LESS THAN SIGNIFICANT EFFECT.**

As discussed in the Reclaimed Water Final EIR, the project would have a long-term cumulative and beneficial impact on the reliability of water supplies in the Mammoth basin. The availability of recycled water would also alleviate the anticipated future shortfall between water supply and demand under extended drought conditions for all of the anticipated General Plan build-out scenarios under consideration by the Town of Mammoth Lakes.

***c) Have impacts that will have substantial adverse effects on human beings, either directly or indirectly?***

**POTENTIALLY SIGNIFICANT IMPACT.**

As discussed under Hydrology, the project may have significant impacts on surface and groundwater quality. These potential impacts will be evaluated in the forthcoming EIR.

**ATTACHMENT A  
PRELIMINARY THRESHOLDS OF SIGNIFICANCE  
FOR WATER QUALITY**

As noted in the Checklist Discussion, Lahontan Regional Water Quality Control Board (LRWQCB) staff members have indicated that it may be possible to obtain an exemption from the waste discharge prohibitions. Such an exemption would require the Board to find, on the basis of written analyses, that the exemption would not create a condition of pollution or nuisance, and would not result in an adverse impact to water quality or beneficial uses. The designated beneficial uses for waters of the Long Hydrologic Area are shown below:

**BENEFICIAL USES OF SURFACE WATERS AND GROUND WATERS  
LONG HYDROLOGIC AREA**

<b>SURFACE WATERS</b>	<b>GROUND WATERS</b>
Municipal and Domestic Water Supply	Municipal and Domestic Water Supply
Agricultural Supply	Agricultural Supply
Groundwater Recharge	Industrial Service Supply
Freshwater Replenishment	Freshwater Replenishment
Water Contact Recreation	
Non-Contact Recreation	
Commercial and Sport-fishing	
Cold Freshwater Habitat	
Wildlife Habitat	
Spawning, Reproduction and Development	

Among the key water quality issues identified by the Regional Board with respect to the proposed recycled water project are (1) the potential for applied recycled water to enter the groundwater basin and adversely impact groundwater quality (due to constituent concentrations above adopted standards, or due to the cumulative effect of nutrients from recycled water and applied fertilizers); and (2) the potential for applied recycled water supplies to enter surface waters downgradient of the golf course (due to inadequate containment capacity in the golf course storage basins/lake features, or due to over-irrigation, or other factors).

In keeping with these issues, the forthcoming EIR will provide a detailed analysis of potential project impacts on surface water quality and groundwater quality associated with application of the full 1.55 mgd tertiary treatment capability approved for MLWWTP. This Attachment outlines the Thresholds proposed to be used in the EIR for determining the significance of potential water quality impacts. Establishment of appropriate thresholds is an important part of the CEQA process, and also a key element of the continuing dialogue between MCWD and the Regional Board concerning water reuse in the Mammoth Basin.

**PROPOSED THRESHOLDS OF SIGNIFICANCE FOR HYDROLOGY & WATER QUALITY**

The proposed project would be considered to have a significant impact if:

1. The Project would cause a violation of the Waste Discharge Limitations issued (or to be issued) by LRWQCB to MCWD (WDID No. 6B260103001) including (but not limited to):
  - a. Reclamation Requirements: Reclamation Requirements shall be defined as the criteria outlined in Title 22 for use as a supply source for unrestricted recreational impoundments, and shall be at all times an adequately

disinfected, oxidized, coagulated, clarified, filtered wastewater. The wastewater shall be considered adequately disinfected if at some location in the treatment process the median number of coliform organisms does not exceed 2.2 per 100 milliliters and the number of coliform organisms does not exceed 23 per 100 milliliters in more than one sample within any 30-day period. The median value shall be determined from the bacteriological results of the last 7 days for which analyses have been completed.

- b. Receiving Water Limitations: Receiving water limitations shall be as shown in the current WDID (p. 5), including 10 mg/l as the maximum allowed nitrate concentration in groundwaters beneath the disposal sites.
  - c. General Requirements and Prohibitions: As shown in the current WDID (pages 5-6).
2. The Project would cause a violation of LRWQCB narrative groundwater quality objectives as contained in the adopted Water Quality Control Plan (all objectives).
  3. Project-related recharge or production could place an aquifer in a state of overdraft, or cause excessively high water table.
  4. The Project would cause a violation of LRWQCB surface water quality objectives as contained in the adopted Water Quality Control Plan including (but not limited to):

**Surface Water Quality Objectives  
(average/90<sup>th</sup> percentile value)**

<b>Constituent</b>	<b>Mammoth Creek at Twin Lakes Bridge</b>	<b>Mammoth Creek at Old Mammoth Road</b>
TDS	60/90	85/115
Chlorine	0.6/1.0	0.8/1.4
NO <sub>3</sub> -N	0.4/0.8	0.4/0.8
Total N	0.5/1.0	0.6/1.0
PO <sub>4</sub>	0.03/0.05	0.27/0.50