
**DRAFT
ENVIRONMENTAL ASSESSMENT**

**PROPOSED TERMINAL AREA DEVELOPMENT
PROJECT**

**Mammoth Yosemite Airport
Town of Mammoth Lakes
Mono County, California**

Prepared for:

Town of Mammoth Lakes, California
437 Old Mammoth Road, Suite 230, Mammoth Lakes, California 93546

**U.S. Department of Transportation
Federal Aviation Administration**
As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

Prepared by
Wallace Environmental Consulting, Inc.

June 2021

This environmental assessment becomes a Federal document when evaluated, signed and dated by the Responsible FAA Official.

Responsible FAA Official _____

Date _____

GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT IS IN THIS DOCUMENT? This National Environmental Policy Act, Draft Environmental Assessment (EA) was prepared for the Town of Mammoth Lakes (Town) to evaluate a proposed Terminal Area Development Project at Mammoth Yosemite Airport (MMH). The Terminal Area Development Project includes a new passenger terminal building; new maintenance facility; terminal aircraft parking apron, infrastructure to support the project and demolition of an existing tensile structure. Additionally, Airport Road would be extended to serve the proposed new passenger terminal area. This Draft EA provides information on the Proposed Action; discusses the purpose of and need for the Proposed Action; describes alternatives considered; and discloses the analysis and findings of potential environmental, social, and economic impacts associated with the Proposed Action and reasonable alternatives. Information on how to comment on the Draft EA is also included in this document.

BACKGROUND: MMH is a Title 14 Code of Federal Regulations Part 139 certificated Commercial Service Airport located approximately six miles east of the Town of Mammoth Lakes and serves commercial, charter and general aviation aircraft. MMH's existing terminal area includes a terminal building constructed in a converted maintenance building.

WHAT SHOULD YOU DO? Read this Draft EA and attend the virtual public workshop and virtual public hearing on this Draft EA. Copies of the DEA are available for a 35-day review period beginning on **June 19, 2021** and ending on **July 23, 2021**. A virtual public workshop will be held on **July 19, 2021** from 4 p.m. to 4:30 p.m. to address questions regarding the proposed project; a virtual public hearing will be held immediately following the virtual workshop from 4:30 p.m. to 5:30 p.m. During the virtual public hearing, the Town will take comments from the public; a court reporter will transcribe those comments. The virtual workshop and virtual public hearing can be accessed via Zoom meetings at: Meeting ID – 243 175 7893; pass code 5z1Mja; or by call-in number: 1-669-900-6833 and use pass code 842052.

Documents may be viewed on the Town's web page at <https://www.townofmammothlakes.ca.gov/939> and at the following physical locations:

Town of Mammoth Lakes
Planning Division
437 Old Mammoth Road,
Suite 230
Mammoth Lakes, CA
(760) 965-3630

Mammoth Yosemite
Airport
1300 Airport Road
Mammoth Lakes, CA
By Appointment
(760) 965-3622

Mono County Library
Mammoth Lakes Branch
400 Sierra Park Road
Mammoth Lakes, CA
(760) 934-4777

If you have important environmental information that has not been considered in this document or comments about the environmental conclusions, you may submit written comments to:

Town of Mammoth Lakes
Attention: Kim Cooke, Associate Planner
P.O. Box 1609
Mammoth Lakes, CA 93546
kcooke@townofmammothlakes.ca.gov
(760) 965-3638

Comments should be as specific as possible and address the adequacy of the Proposed Action, the merits of the alternatives, and the analysis of potential environmental impacts. The cutoff date for comment submission is no later than **5 p.m. on July 23, 2021**. Please allow enough time for mailing. The Town **must receive** your comments by the close of business, not simply postmarked, by that date.

PRIVACY NOTICE: *Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.*

WHAT HAPPENS AFTER THIS? The Town of Mammoth Lakes will prepare and submit a Final EA to the FAA. All comments received during the public review period will be responded to in the Final EA. The FAA will independently review the Final EA to determine its adequacy under the *National Environmental Policy Act* (NEPA), Council on Environmental Quality's regulations implementing NEPA (40 CFR Part 1500) (1978, as amended in 1986 and 2005), and FAA Orders 1050.1F and 5050.4B. If the Final EA is determined to be adequate, the FAA will accept the document and decide to either issue a Finding of No Significant Impact (FONSI) or prepare a Federal Environmental Impact Statement (EIS).

LIST OF ACRONYMS

AEDT	Aviation Environmental Design Tool
AFFF	Aqueous Fight Fighting Foam
AIP	Airport Improvement Program
ALP	Airport Layout Plan
APE	Area of Potential Effect
ARC	Airport Resource Code
ARB	Air Resources Board
ARFF	Aircraft Rescue and Fire Fighting
ASL	Above Sea Level
BIH	Bishop Airport, Inyo County, California
BLM	U.S. Bureau of Land Management (Department of Interior)
CAA	U.S. Clean Air Act
CalEEMod	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
CCAA	California Clean Air Act of 1988
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CRJ-700	Canadair Regional Jet
CWA	U.S. Clean Water Act
dB	decibels
dBA	A-weighted decibel scale
DEA	Draft Environmental Assessment
DNL	Yearly Day-Night Average Sound Levels
District	Great Basin Unified Air Pollution Control District
EA	Environmental Assessment (National Environmental Policy Act)
EIS	Environmental Impact Statement (National Environmental Policy Act)
EO	Executive Order
ESTA	Eastern Sierra Transit Authority
FAA	Federal Aviation Administration – U.S. Department of Transportation
FBO	Fixed Based Operator (Hot Creek Aviation)
FONSI	Finding of No Significant Impact
FR	Federal Register
GHG	Greenhouse Gases
ICAO	International Civil Aviation Organization
LADWP	Los Angeles Department of Water and Power
LOS	Level of Service (passenger services)
MMH	Mammoth Yosemite Airport
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO ₂	Nitrogen dioxide
NPDES	National Pollution Discharge Elimination System

NPIAS	National Plan of Integrated Airport Systems
O ₃	Ozone
Pb	Lead
PFAS	perfluoroalkyl and/or polyfluoroalkyl substances
PFC	passenger facility charges
PM	Particulate Matter
RCRA	Resource Conservation Recovery Act
RNO	Reno Tahoe International Airport
RWQCB	Regional Water Quality Control Board (State of California)
SCE	Southern California Edison
SHPO	State Historic Preservation Officer (California)
SIP	State Implementation Plan
SNARL	Sierra Nevada Aquatic Research Laboratory
SO ₂	Sulfur dioxide
sq.ft.	square feet
SWPPP	Stormwater Pollution Prevention Plan
TADP	Terminal Area Development Project
TSA	Transportation Security Administration
Town	Town of Mammoth Lakes, California
UAL	United Airlines
U.S.C.	United States Code
U.S. DOT	Department of Transportation
U.S. EPA	Environmental Protection Agency
USFWS	Fish and Wildlife Service (U.S. Department of Interior)
VOC	Volatile Organic Compound

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CHAPTER 1.0: PURPOSE AND NEED

1.1 INTRODUCTION

Town of Mammoth Lakes, California (Town), the sponsor of the Mammoth Yosemite Airport (MMH or Airport), prepared this Draft Environmental Assessment (DEA) to evaluate the potential environmental effects of the construction and operation of a new passenger terminal, aircraft parking aprons, new maintenance facility and supporting infrastructure as proposed in the *Mammoth Yosemite Airport Terminal Area Development Plan* (2017)¹. To do so, the Town is requesting Federal Aviation Administration (FAA) approval of the proposed Terminal Area Development Project (TADP) on its Airport Layout Plan (ALP) and potential federal funding assistance for eligible elements of its proposed project.

This Environmental Assessment (EA) has been prepared pursuant to the requirements of Section 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA, Title 42 of the United States Code [U.S.C.] §§ 4321-4335), and as codified by the Council on Environmental Quality Regulations (CEQ Regulations, Title 40 of the Code of Federal Regulations [C.F.R.] Parts 1500-1508)², FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B *National Environmental Policy Act Implementing Instructions for Airport Actions*. The FAA is the lead federal NEPA agency. This EA analyzes and documents the potential environmental impacts of implementing the proposed action, and identifies mitigation measures that may be necessary to reduce the magnitude of those impacts.

1.2 AIRPORT BACKGROUND

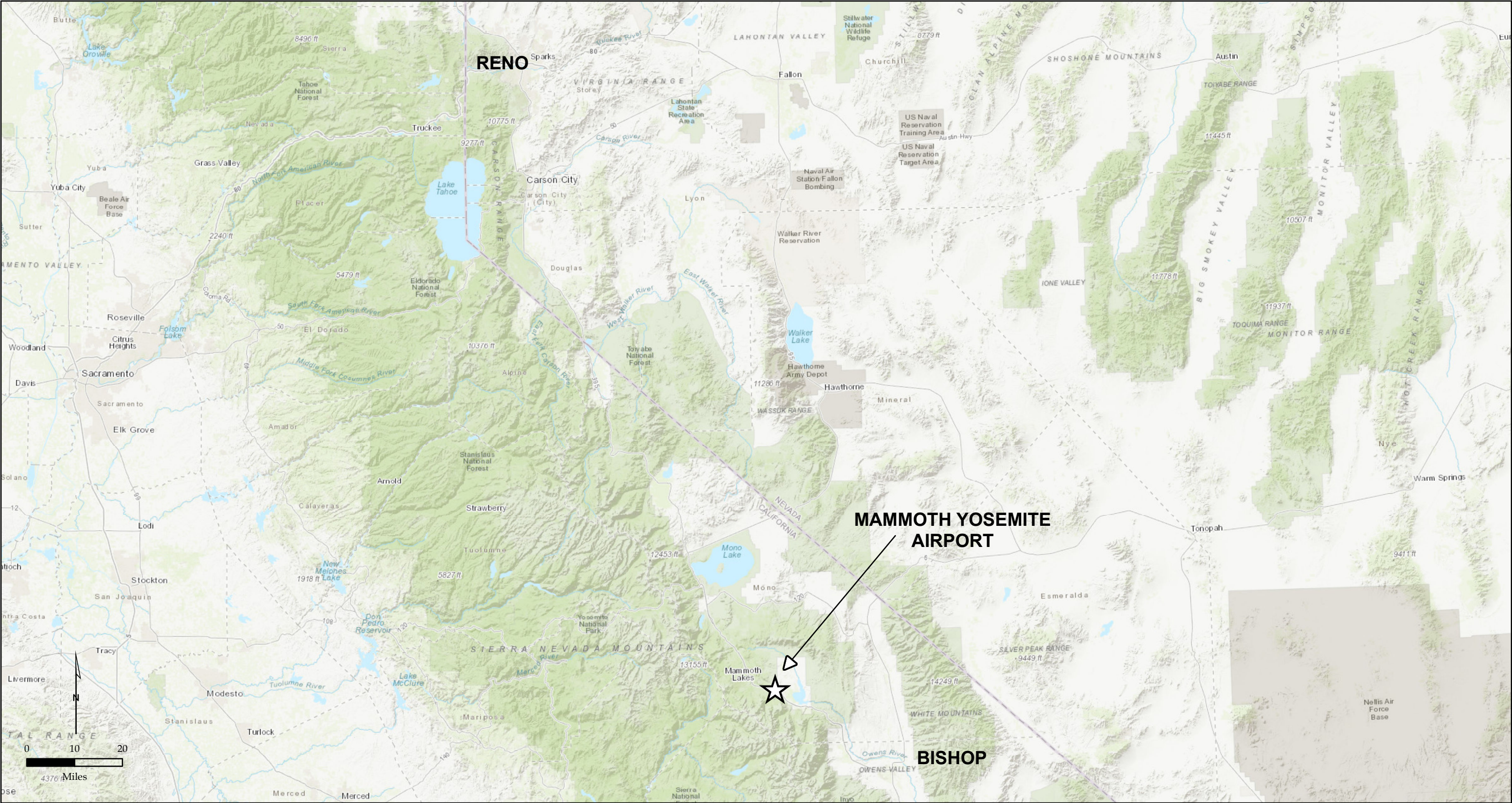
MMH is a 14 CFR Part 139 certificated (Part 139 certification) Commercial Service Airport located approximately six miles east of the Town of Mammoth Lakes along U.S. Highway 395 (Exhibit 1-1) in the western portion of Long Valley at an elevation of approximately 7,128 feet above mean sea level. MMH is designated as an Airport Reference Code (ARC) B-III facility, with a future plan to achieve ARC C-III standards on its ALP. The ARC is used for planning and design purposes, and does not limit the aircraft that may be able to operate safely at an airport.³ The ARC is a coding system developed by the FAA to relate airport design criteria to the operational and physical characteristics of the airplane types that will operate at a particular airport. The ARC has two components relating to the airport and relates to aircraft approach speed. The second component, depicted by a Roman numeral, is the airplane design group and relates to airplane wingspan.

The Town is the owner and operator of the Airport which serves commercial, charter and general aviation aircraft. MMH has a single runway which is 100 feet wide and 7,000 feet

¹ This EA was prepared using Council on Environmental Quality Regulations adopted November 28, 1978. On July 16, 2020 the CEQ promulgated revised regulations implementing NEPA (40 CFR Parts 1500-1508) that became effective on September 14, 2020. This EA was already in progress before CEQ's final rule was published in the Federal Register (85 FR 43304). Accordingly, the EA was prepared in compliance with the previous version of the regulations, 40 CFR Parts 1500-1508 (1978, as amended in 1986 and 2005).

² The TADP was developed to achieve Airport Reference Code C-III standards.

³ FAA Advisory Circular 150/5300-13A, *Airport Design*.



Prepared by the Town of Mammoth Lakes, CA

Project Layout From:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
Image Source: Digital Globe, 2015

Draft Environmental Assessment
Terminal Area Development Project

EXHIBIT 1-1

MAMMOTH YOSEMITE AIRPORT
TOWN OF MAMMOTH LAKES
REGIONAL LOCATION

June 2021

long; a full-length parallel taxiway (Exhibit 1-2); an existing terminal building constructed in a converted maintenance building; an office building; aircraft hangars, parking lots and landscaped areas. Due to the lack of space within the passenger terminal, a temporary tensile structure was constructed to provide passengers with indoor shelter (Exhibit 1-3).

Since its acquisition by the Town from Mono County in 1992, MMH has been owned and operated by the Town for the benefit of the Eastern Sierra region. The U.S. Forest Service (Inyo National Forest) has designated the Town of Mammoth Lakes as a “gateway” community for recreational activities on Forest Service lands and for Yosemite National Park. The Airport plays a key role in providing visitor access to the Eastern Sierra region.

MMH is an important air service element for commercial, charter, military, helicopter, general aviation, life flight and firefighting aircraft. It is one of three airports in Mono County and is the only airport currently providing commercial air service in the Eastern Sierra region. However, the Town is working cooperatively with Inyo County in its pursuit of Part 139 certification for commercial air service and shifting subsidized air service to the Bishop Airport (BIH). Regardless of the Inyo County proposal for BIH, the Town remains committed to maintaining its Part 139 certification and providing passenger service at MMH through a combination of scheduled commercial and/or scheduled charter flights.

Initial commercial air passenger service began at MMH in 1973 after the construction of a passenger terminal in 1972 which is currently used by the Fixed Based Operator (FBO). Commercial air passenger service continued intermittently through 1997. After an 11-year hiatus consistent commercial air service began with subsidized service from Alaska Airlines in 2008 and in 2011 with United Airlines, Inc. and its partner (SkyWest Airlines operating as United Express) (UAL).

In 2011-2012, the two airlines provided up to seven flights daily; Alaska Airlines ended its service in November 2018; all commercial airline passenger service is now provided by UAL, utilizing a Canadair Regional Jet 700 (CRJ-700), an ARC CII aircraft.

Charter air service is available from various private companies for departure locations in southern California. Typically charter flights operate during the winter ski season, but are also available on a limited basis at all times of the year. In 2018 and 2019, a total of 205 scheduled chartered flights served MMH with an estimated 8,979 passenger enplanements⁴.

1.2.1 Summary of Existing Passenger Terminal Facilities

In 2008, the Airport’s 5,060 square foot equipment maintenance facility was remodeled to serve as an interim passenger terminal. However, during peak activity, commercial flights created overcrowding when as many as 140 arriving and departing passengers simultaneously accessed the terminal. In 2011, to relieve passenger overcrowding, to improve the passenger level of service and provide passengers protection from the

⁴ Hot Creek Aviation, personal communication March 2020.

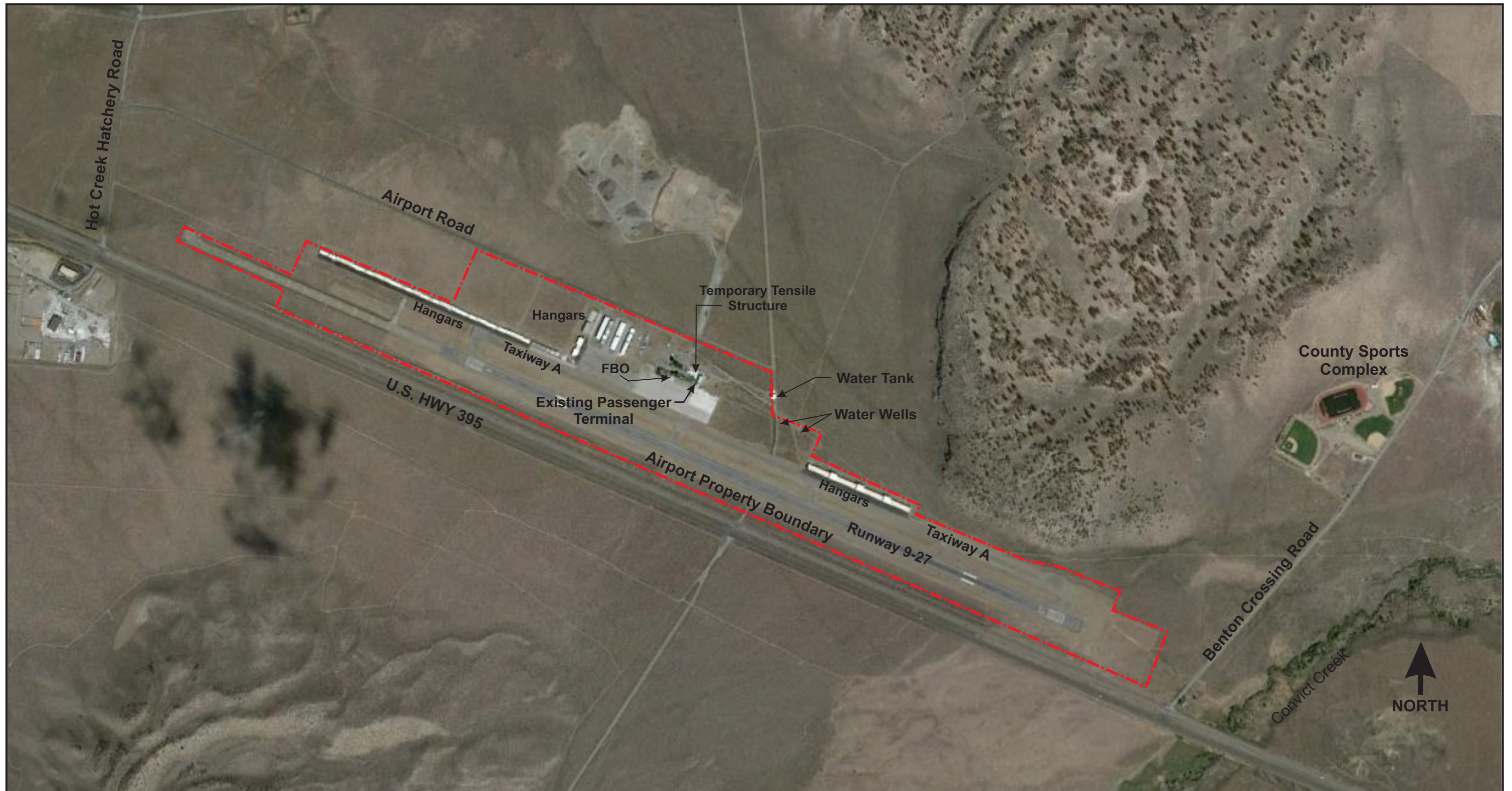


EXHIBIT 1-2

Prepared by the Town of Mammoth Lakes, CA

Project Layout from:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
Image Source: GoogleEarth

Draft Environmental Assessment Terminal Area Development Project Existing Airport Layout

Mammoth Yosemite Airport Town of Mammoth Lakes

June 2021



Source: Google Earth; Imagery Date 9/13/2019

EXHIBIT 1-3



Draft Environmental Assessment Terminal Area Development Project Existing Terminal Area Conditions

Mammoth Yosemite Airport Town of Mammoth Lakes

June 2021

inclement weather, the Town constructed a temporary 2,250 square foot “tensile structure” passenger holding facility. The current interim terminal building and tensile structure do not provide adequate levels of service for passenger ticketing, baggage handling, waiting rooms, concessions or security operations.

Based on Federal Aviation Administration (FAA) terminal planning guidance⁵ an airport passenger terminal should provide an optimum level of service considering peak passenger volume in all terminal elements including processing time, level of crowding, walking distance, baggage handling and protection from inclement weather. Based on overall terminal planning criteria for existing activity levels (passenger enplanements and deplanements and aviation operations) and to obtain the desired level of passenger service, the current passenger MMH terminal facilities should be a minimum size of between 12,500 to 15,000 square feet (sq.ft.).

1.2.2 Aviation Forecasts

The analysis in this NEPA document uses an aviation forecast prepared before the COVID-19 Pandemic began. This forecast is included to provide a conservative estimate of potential environmental impacts of the proposed action. FAA forecast approval was based on the methodology, data, and conclusions at the time the document was prepared. However, it is necessary to acknowledge the impacts of COVID-19 Pandemic on aviation activity, including reduced confidence in growth projections using currently-available data

Forecasts of aviation demand are used to identify existing and future facility needs and are informed by the number of aviation operations, destinations served, aircraft fleet mix, based aircraft, air cargo volumes and the number of passengers (referred to as “enplanements”).

In 2017, the Town prepared *Mammoth Yosemite Airport Aviation Activity Forecasts* for a ten-year period. In 2018, Alaska Airlines ceased MMH operations, leaving UAL as the only commercial carrier serving MMH with CRJ-700 aircraft. To account for the change in aviation operations, the Town prepared *Mammoth Yosemite Airport Aviation Activity Forecast 2019 Addendum*. On June 19, 2019 the FAA reviewed and approved the updated *Mammoth Yosemite Airport Aviation Activity Forecast* dated May 15, 2019 (Appendix A). The CRJ-700, an ARC CII aircraft, is the critical aircraft for airport planning and design purposes.

Since 2010, the Town has subsidized air passenger services to incentivize consistent air service. The greatest numbers of passengers visiting the Mammoth Lakes area arrive during the winter recreation season: November through April. The peak month for passenger activity can vary annually depending on weather (January, February or March) and typically accounts for over 16 percent to nearly 20 percent of annual enplanements. This high proportion of passengers during the peak months increases the demands on passenger terminal facilities. The aviation forecast assumes that passenger volumes outside of the ski

⁵ FAA Advisory Circular 150/5360-13-A, *Airport Terminal Planning*, July 13, 2018

season would remain static. Table 1-1 presents the past, existing and forecast enplanement for the 10-year period 2018 through 2028; the new passenger terminal is projected to open in 2023⁶.

Table 1-1: Passenger Enplanement Forecast

Passenger Enplanement Forecast		
	Year	Passenger Enplanements
Base Year	2018	22,594
Forecast Years	2019	15,953
	2020	19,734*
	2021	20,020
	2022	20,307
	2023	22,824
	2024	23,138
	2025	23,453
	2026	23,770
	2027	24,067
	2028	24,387
Note: Neither scheduled nor unscheduled charter flights are included in these forecast numbers. Source: <i>Mammoth Yosemite Airport, Aviation Activity Forecasts, 2019 Addendum</i>, May 2019 *Will be lower due to CA restriction re COVID-19 Pandemic.		

⁶ *Mammoth Yosemite Airport Aviation Activity Forecast 2019 Addendum*

Based on the 2019 Forecast Addendum, as approved by the FAA, the pattern of incremental growth at the Airport may follow these paths:⁴

- Incremental load factor increases (percentage of aircraft occupied by passengers) from some destinations, including Denver, San Francisco and Los Angeles.
- Increased charter flights from select markets, for example San Diego in 2020.

The analysis in this NEPA document uses an aviation forecast prepared before the COVID-19 public health emergency began. This forecast is included to provide a conservative estimate of potential environmental impacts of the proposed action. FAA forecast approval was based on the methodology, data, and conclusions at the time the document was prepared. However, it is necessary to acknowledge the impacts of COVID-19 public health emergency on aviation activity, including reduced confidence in growth projections using currently-available data.

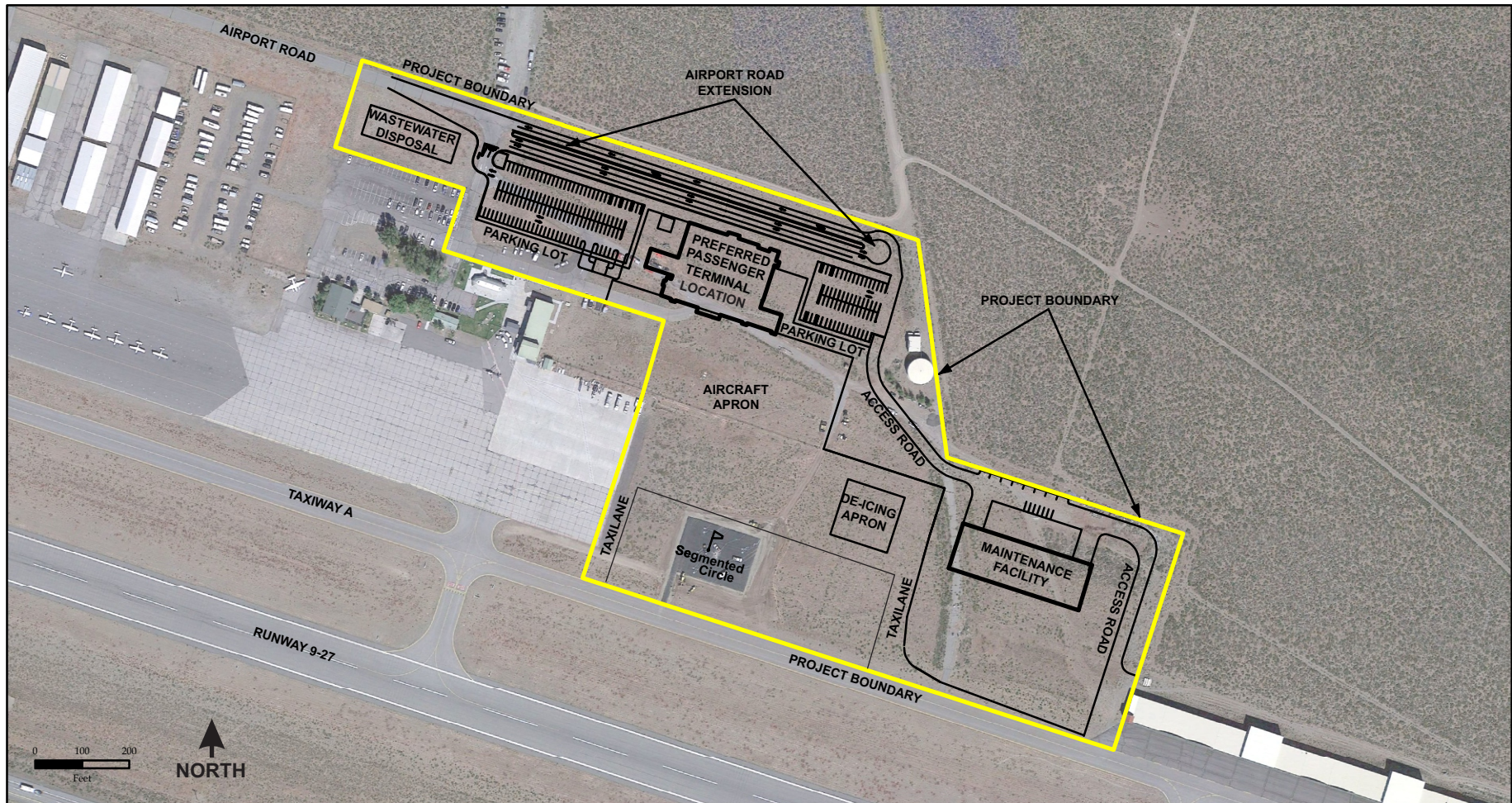
Nationwide, the Coronavirus (COVID-19) pandemic negatively affected airline passengers beginning in the first quarter of 2020 and continuing to the present, including enplanements at MMH. Based on national airline passenger data, passenger airline operating revenues fell 66-67 percent from late 2019 to February 2021 (*Impact of COVID-19: Date Updates*, www.airlines.org). MMH suffered significant passenger declines because of the pandemic and the state's orders to locally restrict the operation of hotels, restaurants and the Mammoth Mountain ski area. Passenger enplanements are expected to rebound as local and state restrictions are modified to allow regional visits

1.3 DESCRIPTION OF PROPOSED ACTION

The Proposed Action, the construction and operation of a TADP, is shown in Exhibit 1-4. Components of the Proposed Action would include:

- New passenger terminal building; maximum size 38,688 sq. ft.
- Access and service roads, including an extension of Airport Road
- Automobile parking for passenger and rental cars
- Aircraft parking apron
- Aircraft de-icing apron and de-icing fluid holding tank
- Connecting taxiways to Taxiway A
- Maintenance, Aircraft Rescue and Fire Fighting (ARFF) and Snow Removal equipment building (maintenance facility)
- Supporting infrastructure and utilities
- Demolition of the tensile structure and some paved access roads

⁴Mammoth Yosemite Airport, Aviation Activity Forecasts, 2019 Addendum, prepared for the Town of Mammoth Lakes, prepared by Mead & Hunt, January 29, 2019.



Prepared by the Town of Mammoth Lakes, CA

Project Layout From:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
Image Source: Google, Sept. 2019

**Draft Environmental Assessment
Terminal Area Development Project
Proposed Action Alternative**

EXHIBIT 1-4

**MAMMOTH YOSEMITE AIRPORT
TOWN OF MAMMOTH LAKES**

June 2021

The Proposed Action would take place on Airport property generally east of the existing passenger terminal building and south of the proposed Airport Road extension. The new passenger terminal, two vehicle parking lots with a total of 190 spaces, new aircraft aprons and the maintenance facility would occupy approximately 19-acres of undeveloped land in the northern portion of the airport.

Airport Road would be extended approximately 840-feet east of its existing terminus and be widened to serve the front of the terminal, provide passenger drop-off and pick-up and access to two parking lots. The Airport Road extension would terminate in a cul-de-sac.

A new maintenance facility (8,400 sq.ft.) would be located 600-feet southeast of the proposed passenger terminal as shown on Exhibit 1-4. The maintenance facility would include an 8-bay facility for ARFF and snow removal equipment, vehicle parking apron (32,750 sq.ft.) and new access road (400 feet x 25 feet).

The existing terminal building would remain as a possible charter aircraft terminal building or as a facility for a FBO. The tensile building associated with the existing terminal would be removed.

1.3.1 New Passenger Terminal Building

The proposed passenger terminal building (38,688 sq. ft. maximum) would include a passenger lobby, ticket counters, departure lounges, three airline gate positions, restrooms, rental car counters, Transportation Security Administration (TSA) security areas, baggage claim and handling areas, mechanical and electrical utility rooms, airport offices and a restaurant.

1.3.2 Access and Service Roads

To provide vehicle access to the new terminal, Airport Road would be extended about 840 feet east of its existing terminus. There would be a 20-foot-wide concrete sidewalk in front of the terminal building and a 9-foot space, 400 feet long for parallel automobile parking used for passenger loading and unloading, two 12-foot eastbound travel lanes, a 10-foot concrete island and two 12-foot westbound travel lanes.

An asphalt-paved access road would be constructed to serve the new maintenance facility located east of the de-icing apron. A second road would be constructed from the maintenance facility to Taxiway 'A' to provide direct access to the airfield for snowplows and emergency vehicles.

1.3.3 Automobile Parking

There is available area on the airport property adjacent to the proposed terminal, for two automobile parking areas. The parking area west of the terminal would be used to replace existing rental car company vehicle parking, and would accommodate 130 automobiles.

The parking lot east of the terminal would be used by commercial passengers and other visitors and there would be space for 60 parked automobiles.

1.3.4 Aircraft Parking Apron

The proposed aircraft parking apron (130,500 sq.ft.) would be capable of accommodating three ARC CII aircraft in a taxi-in/pushout type operation.

1.3.5 Aircraft De-icing Apron

The de-icing apron would be constructed on a concrete slab and would be graded to a central drain in the middle of the apron. Storm water and/or de-icing fluid from this apron would be collected in the central drop inlet and carried by pipe to a holding tank where de-icing fluid can be temporarily stored, pumped out, and transported to a licensed disposal facility, probably the U.S. Ecology Nevada, facility in Beatty, Nevada.

1.3.6 Connecting Taxilanes

Two connecting taxilanes, 230 and 280 feet long and 50 feet wide, would connect the new aircraft parking apron and de-icing apron to Taxiway "A".

1.3.7 Maintenance Facility

An eight-bay maintenance facility would be constructed (60 feet x 140 feet; 8,400 sq.ft.) to house ARFF and snow removal equipment and includes a parking apron (32,750 sq. ft.) and a new access road (800 feet x 25 feet) to connect to Taxiway "A".

1.3.8 Supporting Infrastructure

Utilities to serve the terminal building are included in the TADP:

- Sewer systems including a new packaged waste water treatment plant and disposal field.
- Water to be supplied by existing on-airport wells.
- Electricity would be provided by Southern California Edison.
- Telecommunication facilities.
- Propane tank.

1.3.9 Demolition

To construct the TADP, approximately 2,100 linear feet of existing paved access roads would be demolished; all other permanent airport structures would remain. The temporary tensile structure would be removed.

1.4 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.4.1 Sponsor's Purpose and Need

The Sponsor's purpose and need of the Proposed Action is to improve the Town's ability to meet its terminal complex needs to safely and efficiently convey existing and future

passengers through Mammoth Yosemite Airport. Adequate space for terminal functions would enhance safe and efficient movement of people through the airport consistent with 49 United States Code (U.S.C.) §47101(a)(7).

The existing passenger terminal is a remodeled maintenance building and is too small to provide acceptable levels of passenger service. Existing terminal conditions result in inconvenience and delays for arriving and departing passengers. Among the issues with the existing terminal, which are exacerbated in the winter, are outdoor baggage handling facilities and inadequate passenger accommodations which limit flight schedules; limited space for TSA; limited indoor hold room seating; no concession facilities; limited number of gates; undersized restroom facilities; limited passenger drop-off and pick-up areas; undersized general waiting areas and inefficient climate control.

The existing terminal aircraft apron can only accommodate one aircraft at a time which limits flexible airline schedules.

The Town is expending funds to lease an undersized hangar onsite for equipment and ARFF storage. The purpose of a new maintenance facility is to provide protection from the weather for the ARFF, and provide a safe storage and maintenance area for the Airport's snow plows and firefighting equipment and supplies. De-icing fluids are currently stored and managed by individual airlines; the Town could arrange to move de-icing fluid storage to the new maintenance building.

1.4.2 FAA Purpose and Need

The FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the United States. The FAA must ensure that the proposed action does not derogate the safety of aircraft and airport operations at MMH. Moreover, it is the policy of the FAA under 49 U.S.C. Section 47101(a)(6) and (7) that airport development projects provide for the protection and enhancement of natural resources and the quality of the environment of the United States, and that airport construction and improvement projects that increase the capacity of facilities to accommodate passenger and cargo traffic be undertaken to the maximum feasible extent so that safety and efficiency increase, and delays decrease.

1.5 REQUESTED FEDERAL ACTIONS

Recent changes in federal law have required the FAA to revisit whether FAA approval is needed for certain types of airport projects throughout the nation. Section 163(d) of the FAA Reauthorization Act of 2018 limits the FAA's review and approval authority for ALPs to those portions of ALPs or ALP revisions that:

- materially impact the safe and efficient operation of aircraft at, to, or from an airport;

- adversely affect the safety of people or property on the ground adjacent to an airport because of aircraft operations;
- or adversely affect the value of prior federal investments to a significant extent.

Therefore, MMH requests the following FAA actions for the proposed action described in Section 1.3 that are subject to FAA approval and funding:

- Unconditional approval of the portion of the ALP that depicts the TADP pursuant to 49 U.S.C. §§ 40103(b) and 47107(a)(16)(B);
- Determinations under 49 U.S.C. §§ 47106 and 47107 that are associated with the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP) and under 49 U.S.C. § 40117, as implemented by 14 CFR Part 158.25 to use passenger facility charges (PFC) collected at the Airport for the Proposed Action to assist with construction of potentially eligible development items from the ALP.

1.6 DOCUMENT ORGANIZATION

This EA is organized in accordance with FAA Order 1050.1F, Chapter 6, Section 6-2 and includes:

- Chapter 1.0 - Purpose and Need
- Chapter 2.0 - Alternatives (Including the Proposed Action)
- Chapter 3.0 - Affected Environment
- Chapter 4.0 - Environmental Consequences
- Chapter 5.0 - Coordination and Public Involvement
- Chapter 6.0 - List of Preparers
- Chapter 7.0 - References

CHAPTER 2.0: ALTERNATIVES

2.1 INTRODUCTION

CEQ regulations (40 Code of Federal Regulations [CFR] Part 1500 Purpose, Policy and Mandate and 40 CFR Sections 1500.2, 1502.14 and 1505.1) implementing NEPA stipulate that alternatives be considered in environmental documents. As part of the alternatives analysis, agencies are to explore and objectively evaluate all reasonable alternatives and briefly discuss why alternatives were eliminated; treat each alternative similarly and compare the results so that reviewers may evaluate the alternatives comparative merits; include reasonable alternatives not within the jurisdiction of the lead agency. If there are no unresolved conflicts concerning alternative uses of available resources, the range of alternatives may be limited to the no action and proposed action alternatives (FAA Orders 1050.1F, paragraph 6-2.1.d. and 5050.4B, paragraph 706d.(5)). The no action alternative is retained for analysis in the EA pursuant to CEQ regulations at 49 CFR § 1502.14(d).

CEQ regulations (40 CFR § 1502.14) require that federal agencies perform the following tasks for alternative analysis:

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their elimination.
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
- (d) Include the alternative of no action.
- (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
- (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

Alternatives evaluated for the Proposed Action include those alternatives that are responsive to the purpose and need established by the Town. The purpose of the Proposed Action, as identified in Section 1.3 of this EA is to improve the Town's ability to meet its terminal complex needs to safely and efficiently convey existing and future passengers to and from Mammoth Yosemite Airport and that would provide adequate space for terminal functions that would enhance safe and efficient movement of people through the airport.

This chapter describes alternatives to the airfield modifications and new terminal and associated infrastructure. Landside and ground access improvements at airports are designed around the airfield and terminal needs and, thus, were considered in relation to the terminal alternatives. In addition, this chapter summarizes the alternative screening process, and evaluation criteria used to identify, compare, and evaluate the alternatives.

2.2 IDENTIFICATION OF POTENTIAL ALTERNATIVES

The following alternatives were considered as part of the alternative evaluation process:

- Proposed Action (Exhibit 1-4): Construct new passenger terminal, new aircraft parking apron, new maintenance facility and associated infrastructure.
- No Action Alternative (Exhibit 2-1): Continue to use existing passenger terminal and do not construct maintenance facility and associated infrastructure.
- Alternative A-1 (Exhibit 2-2): Construct new passenger terminal in a location that would be closer to existing active airfield; construct maintenance facility and associated infrastructure.
- Alternative A-2 (Exhibit 2-3): Reconstruct existing passenger terminal; construct maintenance facility and associated infrastructure.

Additionally, three off-site alternatives are evaluated:

- Alternative A-3: Develop TADP facilities at an existing airport other than MMH.
- Alternative A-4: Develop a new airport at another location.
- Alternative A-5: Use alternative modes of surface transportation.

This section includes an evaluation of each alternative and its ability to satisfy the Step-One and Step-Two Screening criteria.

2.2.1 Alternatives Screening Process Overview and Summary of Results

The alternative screening process relies on a two-step process to determine which alternatives would be carried forward for further evaluation. Step-One evaluates the ability of an alternative to satisfy the purpose and need outlined in Chapter 1.0 Purpose and Need. Step-Two evaluates the ability of alternatives to satisfy a list of screening factors.



Source: Google Earth; Imagery Date 9/13/2019

EXHIBIT 2-1



**Draft Environmental Assessment
Terminal Area Development Project
No Action Alternative**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

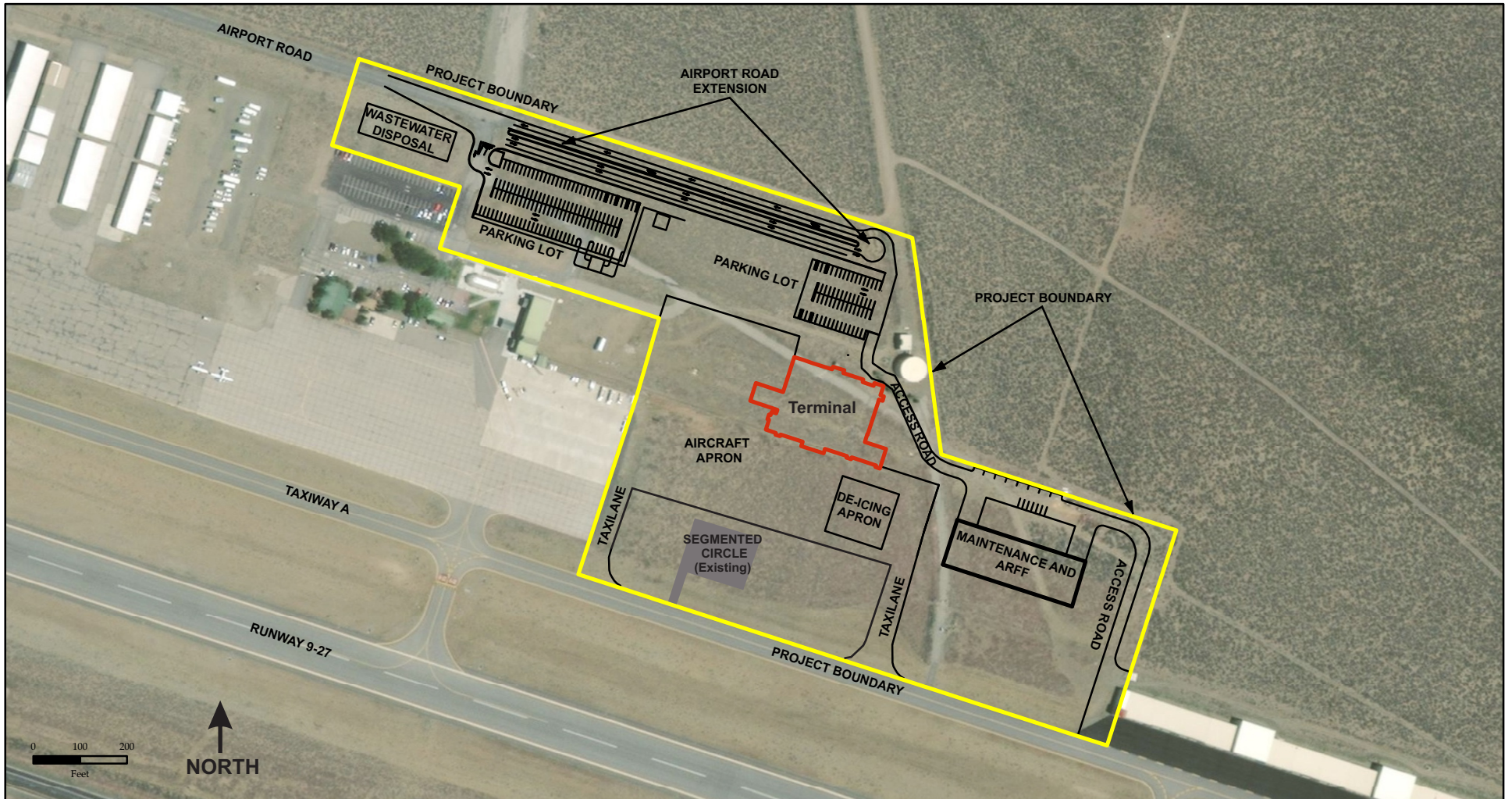


EXHIBIT 2-2

Prepared by the Town of Mammoth Lakes, CA

Project Layout From:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
Image Source: Digital Globe, 2015

Draft Environmental Assessment Terminal Area Development Project Alternative A-1

MAMMOTH YOSEMITE AIRPORT
TOWN OF MAMMOTH LAKES

June 2021

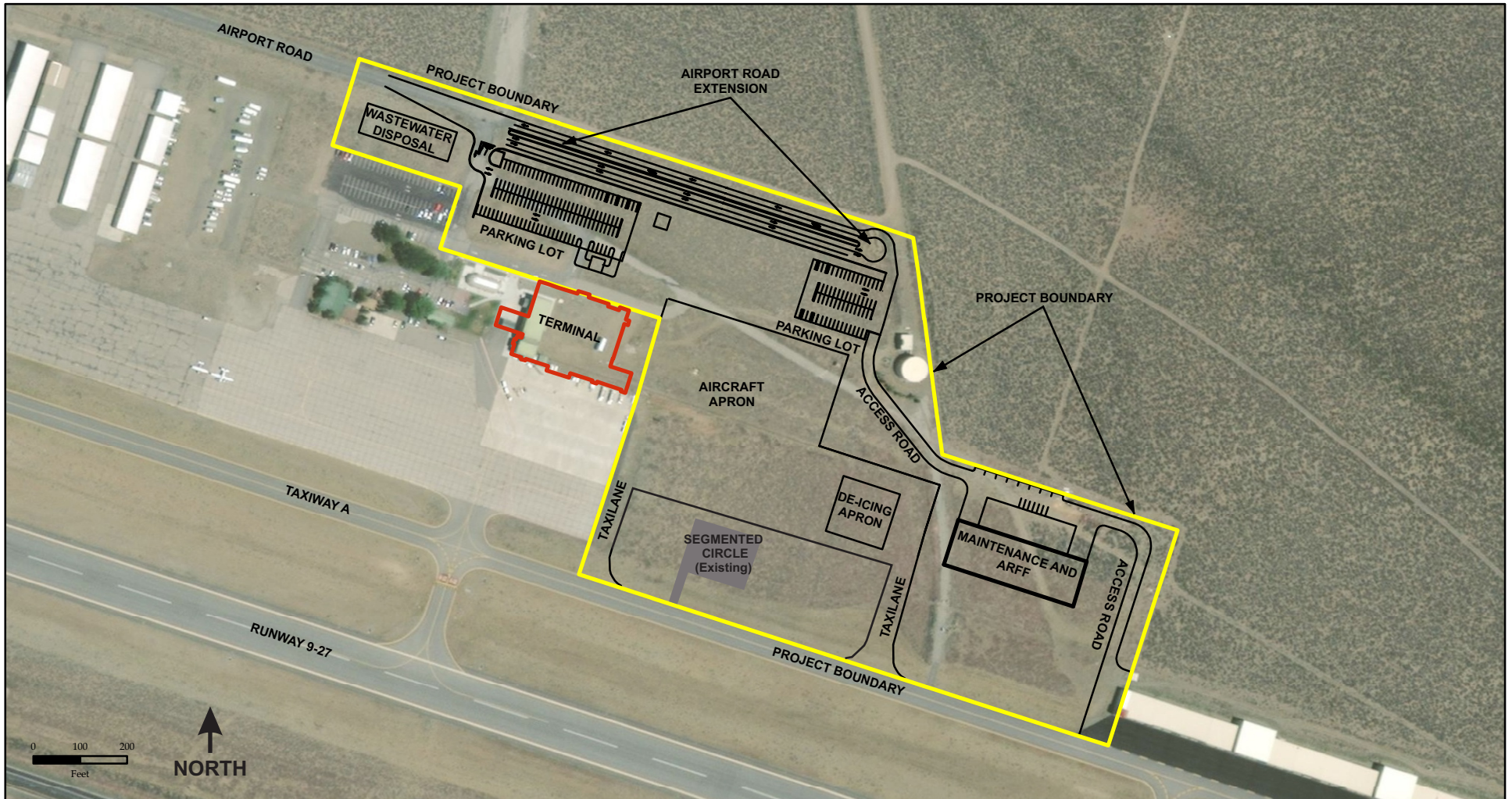


EXHIBIT 2-3

Prepared by the Town of Mammoth Lakes, CA

Project Layout From:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
Image Source: Digital Globe, 2015

**Draft Environmental Assessment
Terminal Area Development Project
Alternative A-2**

**MAMMOTH YOSEMITE AIRPORT
TOWN OF MAMMOTH LAKES**

June 2021

Table 2-1 Alternatives Screening Summary

Step-One Screening and Criteria		Proposed Action	No Action Alternative**	Alternative A-1	Alternative A-2	Alternative A-3	Alternative A-4	Alternative A-5
**The No Action Alternative serves as the current environmental condition against which the environmental, economic and operational performance of other alternatives are compared. It is retained for further analysis pursuant to CEQ guidance.								
Step-One: Purpose and Need	Does alternative meet purpose and need?	YES	NO	YES	YES	NO	NO	NO
Proceed to Step-Two Screening		YES	YES	YES	YES	NO	NO	NO
Step-Two: Does Alternative Satisfy Step-Two Screening Factors?	Achieve Airport Reference Code C-III standards for development of the TADP	YES	NO	NO	YES			
	Cost Effective	YES	NO	YES	NO			
	Located on the Airport	YES	NO	YES	YES			
	Continue Operations During Construction	YES	NO	YES	NO			
Retained for Detailed Analysis in the EA		YES	YES	NO	NO	NO	NO	NO

2.2.2 Step-One Screening: Purpose and Need

The Step-One screening process evaluates each alternative's ability to satisfy the purpose and need discussed in Section 1.4 Purpose and Need. Alternatives are considered to meet this criterion if they satisfy the following:

- Safely and efficiently convey existing and future passengers through the Airport consistent with 49 United States Code (U.S.C.) §47101(a)(7).
- Provide appropriate space for TADP functions for with ARC C-III standards in accordance with design standards set forth in FAA A/C 150/5300-13A, *Airport Design*.
- Provide a facility to safely store and maintain airport firefighting and maintenance equipment including ARFF's and snowplows.

2.2.3 Step-Two Screening: Feasibility

The Step-Two screening analysis is used to determine if an alternative would be feasible. In this case, feasibility was reviewed to ensure that the alternative could be implemented, or be practical, from a technical or economic perspective.

2.2.3.1 Meet FAA Terminal Planning Guidance

This criterion is intended to determine if an alternative would meet FAA design guidelines in accordance with FAA Advisory Circular (A/C) 150/5360-13A, *Airport Terminal Planning* (July 2018). Included in FAA guidance considerations for terminal functionality; safe separation between aircraft aprons; aircraft parking capacity and passenger ingress and egress.

2.2.3.2. Cost Effective

This criterion focuses on an alternative's ability to demonstrate cost effective and avoidance of unnecessary financial expenditures. This is accomplished by examining the relative infrastructure requirements associated with each alternative.

2.2.3.3 Continued Airport Operation

This criterion is intended to assess the extent an alternative could interrupt normal airport operations. Operational disruptions can include, but may not be limited to, temporary passenger terminal closures, disruption or cancelation of flights.

2.3 ALTERNATIVE EVALUATION

2.3.1 Step-One Screening

The Step-One Screening evaluated each alternative's ability to satisfy the Purpose and Need. The results of this screening are presented in this section.

2.3.1.1 Proposed Action Alternative

The Proposed Action, as described in Chapter 1, Section 1.3, would involve development as shown in Exhibit 1-4:

- **Terminal:** A new 38,688 sq. ft. (maximum) terminal building with three passenger arrival/ departure gates meets planning criteria in Federal Aviation Administration (FAA) A/C 150/5360-13A, *Airport Terminal Planning*. The building is designed to be less than 35 feet in height and includes state-of-art telecommunication systems, an efficient electrical system, fire suppression system, efficient heating and cooling system, and new water and wastewater systems.
- **Terminal Aircraft Apron:** 130,500 sq. ft., capable of simultaneously parking up to three regional jets, ARC CIII, - the design aircraft.
- **De-icing Apron:** New apron for de-icing aircraft during winter months equipped with a de-icing fluid holding tank.
- **Connecting Taxilanes:** Two new taxilanes to connect the Terminal Aircraft Apron to Taxiway 'A'.
- **Automobile Parking:** Two new automobile parking lots with a combined capacity of up to 190 vehicles.
- **Access and Service Roads:** Airport Road would be extended to the new Terminal Building; a new service road will be constructed to the new maintenance facility.
- **Maintenance Facility:** An 8-bay maintenance facility (8,400 sq. ft.), to include storage for ARFF and Snow Removal equipment; new access road to connect to Taxiway 'A'.
- **Utilities:** Utilities within consist of: Wastewater Treatment Facility and Disposal Field, Potable Water System, Electrical Service and Telecommunications.

The Proposed Action meets the Step-One Screening criteria because it improves the Town's ability to meet its terminal complex needs to safely and efficiently convey existing and future passengers through Mammoth Yosemite Airport. Adequate space for terminal functions would enhance safe and efficient movement of people through the airport. The Proposed Action was retained for the Step-Two Screening analysis.

2.3.1.2 No Action Alternative Step-One Evaluation

Although the No Action Alternative does not meet the purpose and need, it was retained for detailed analysis in Step-Two Screening analysis in accordance with CEQ regulations at 40 CFR § 1502.14(d) and FAA Order 1050.1F, Paragraph 6-2.1. d and FAA Order 5050.4B Paragraph 706d.

2.3.1.3 Alternative A-1 Step-One Evaluation

An alternative terminal location, Site “A”¹, as shown in Exhibit 2-2, is located approximately 250-feet south of the proposed Airport Road extension cul-de-sac and¹ east of the existing temporary terminal. The Site “A” alternative location provides the same passenger services, accommodates forecasted activity levels, aircraft apron improvements as the Proposed Action and includes the maintenance facility as part of the TADP.

The Eastern Sierra region is characterized as rural and is restricted by rugged geography with limited and frequently obstructed highway access including numerous road closures. MMH plays a crucial role in providing emergency services such as disaster relief, firefighting and operation staging area, and search and rescue activities for the region and state. Therefore, it is imperative that the Town have adequate storage with easy access to its ARFF and snow removal equipment to meet its Part 139 response time obligations. Alternative A-2 meets the Step-One Screening criteria because it meets the Purpose and Need.

Alternative A-2 was retained for the Step-Two Screening analysis.

2.3.1.4 Alternative A-3 Step One Evaluation

This alternative would develop terminal facilities at another airport in the region. MMH is a federally obligated commercial service airport that is part of the National Plan of Integrated Airport Systems (NPIAS). It meets NPIAS criteria because it serves a community located 30 minutes or more by average ground travel time from the nearest existing or proposed NPIAS airports. Currently, the closest commercial service airport, Reno-Tahoe International Airport (RNO), is located in Reno, Nevada, approximately 170 miles north of MMH. Under favorable driving conditions, the estimated drive time to RNO is about 3 hours and 30 minutes.

The Eastern Sierra region is characterized as rural and is restricted by rugged geography with limited and frequently obstructed highway access including numerous road closures. MMH plays a crucial role in providing emergency services such as disaster relief, firefighting and operation staging area, and search and rescue activities for the region and state. Therefore, it is imperative that the Town have adequate storage with easy access to its ARFF and snow removal equipment to meet its Part 139 response time obligations.

As a result of Public Law 95-504, the Airline Deregulation Act of 1978, neither the FAA

¹ Site “A” identified in *Mammoth Yosemite Airport Terminal Area Development Plan*, 2015.

nor the Town, has the authority to direct or limit air carrier or limit Airport operations.

This includes determining the airports at which airlines decide to serve passenger demand. Additionally, the Town is obligated to adhere to its Airport Sponsor Assurances which require that airport revenues be expended by it for the direct capital or operating costs of the airport which it owns and operates, in this case MMH. For the reasons stated above, this alternative does not meet the Town's Purpose and Need for its proposed project, therefore, it did not achieve Step-One Screening criteria and was eliminated from further consideration.

2.3.1.5 Alternative A-4 Step-One Evaluation

This alternative evaluates developing a new airport located on another site as a replacement for MMH. Development of another airport would require infrastructure capable of handling all the existing and forecast operations at MMH and achieving all applicable FAA airport design standards. Constructing a new airport on another site would require sufficient revenue and time to support identification of an adequately sized site, compliance with all applicable federal, state, and local environmental laws, design, and construction to provide the infrastructure required to support an airport similar to MMH.

This alternative does not meet the Town's Purpose and Need because it does not address the inability of the existing passenger terminal and maintenance hangar to accommodate existing or forecast passenger demand, improve the function of MMH, or increase the airport's opportunity for providing quality service within the existing airport property. Therefore, developing a new airport at another site was eliminated from further consideration as it did not meet the Step-One Screening criteria.

2.3.1.6 Alternative A-5 Step-One Evaluation

This alternative would exclude the Proposed Action and focus on non-aviation public transportation services that could include surface modes of transportation such as train or bus. The Eastern Sierra region, which includes MMH, is not served by passenger rail service. Amtrak, passenger rail service, offers Amtrak Thruway bus service to the Town of Mammoth Lakes from Reno, Nevada. Amtrak Thruway does not serve the Airport or any other locations on Highway 395 south of the Town.

Eastern Sierra Transit Authority (ESTA) provides intercity bus service to the Town from locations in Nevada and Southern California; but does not serve the Airport. ESTA operates bus routes on Highway 395 from Sparks, Nevada and Lancaster, California which connects the Town and other Eastern Sierra communities. The Lancaster route connects to the Metrolink commuter rail station in Lancaster; Metrolink serves the greater Los Angeles metropolitan area. Regardless of available public transportation, the purpose of the Proposed Action is to provide the Town with the ability to meet the Airport's passenger terminal area needs to safely and efficiently convey existing and future passengers through Mammoth Yosemite Airport. The use of non-aviation surface transportation does not meet the Step-One Screening criteria and was eliminated from further consideration.

2.3.2 Step-Two Screening

The Step-Two Screening evaluated the feasibility of the remaining alternatives considering the criteria identified in Section 2.2.3.

2.3.2.1 Proposed Action Alternative Step-Two Evaluation

The Proposed Action passes the Step-Two Screening process because the project is capable of supporting the dimensional requirements of ARC C-III aircraft; the Proposed Action is located on the airport: is technically and economically feasible and does not disrupt ongoing aircraft operations, thereby allowing continued Airport operations during project construction.

2.3.2.2 No Action Alternative Step-Two Evaluation

The No Action Alternative does not meet the Step-One Screening criteria because it does not meet the Purpose and Need. Despite this, the No Action Alternative is retained for further analysis in this EA pursuant to CEQ regulations at 40 C.F.R. § 1502.14(d).

2.3.2.3 Alternative A-1 Step-Two Evaluation

FAA airport geometric design standards require specific separation distances between terminal facilities and aircraft operational areas based on the ARC (FAA AC 150/5360-13A). The location of Alternative A-1 does not meet Airport Reference Code C-III standards for separation from runways and taxiways. Since Alternative A-1 does not meet the Step-Two Feasibility Screening, it was not retained for further analysis in the EA.

2.3.2.4 Alternative A-2 Step-Two Evaluation

Alternative A-2 includes reconstructing the existing temporary terminal to meet the sponsor's proposed terminal improvements to accommodate forecast activities.

If the existing terminal would be reconstructed, maintaining passenger service introduces additional costs for temporary facilities and further reduces passenger levels of service. For instance, the need to provide space that can meet the varying capacity requirements of different aircraft is necessary for the success of a terminal facility.

Constructing a new terminal at the site of the existing terminal would require that the existing terminal building be demolished before a new terminal could be constructed. The layout of the existing terminal building would make it difficult to design, renovate and fit an addition at the current location in a cost-effective manner. This approach would be less cost effective and efficient than constructing a new building. The Town must be able to maintain MMH operations during terminal construction and/or renovation, which would not be possible given the dimensions and configuration of the existing terminal building. Therefore, Alternative A-2 does not meet the Step-Two Screening, it was not retained for further analysis in the EA.

2.4 ALTERNATIVES RETAINED FOR CONSIDERATION

2.4.1 Proposed Action Alternative

The Proposed Action alternative (Chapter 1.0, Section 1.3), is shown in Exhibit 1-4.

The Proposed Action includes the following components:

- **Terminal:** A new 38,688 sq. ft. (maximum) terminal building with three passenger arrival/departure gates meets planning criteria in FAA A/C 150-5360-13A, *Airport Terminal Planning*. The building is designed to be less than 35 feet in height and includes state-of-art telecommunication systems, an efficient electrical system, fire suppression system, efficient heating and cooling system, and new water and wastewater systems.
- **Terminal Aircraft Apron:** 130,500 sq.ft., capable of simultaneously parking up to three regional jets, ARC CII, - the design aircraft.
- **De-icing Apron:** New apron for de-icing aircraft during winter months equipped with a de-icing fluid holding tank.
- **Connecting Taxilanes:** Two new taxilanes to connect the Terminal Aircraft Apron to Taxiway 'A'.
- **Automobile Parking:** Two new automobile parking lots with a combined capacity of up to 190 vehicles.
- **Access and Service Roads:** Airport Road would be extended to the new Terminal Building; a new service road will be constructed to the new maintenance facility.
- **Maintenance Facility:** An 8-bay maintenance facility (8,400 sq.ft.), to include ARFF and Snow Removal equipment; new access road to connect to Taxiway 'A'.
- **Utilities:** Utilities within consist of: Wastewater Treatment Facility and Disposal Field, Potable Water System, Electrical Service and Telecommunications.

The Proposed Action Alternative met the Step-One and Step-Two screening criteria, therefore was retained for further consideration.

2.4.2. No Action Alternative

Under the No Action Alternative, the existing terminal facility (5,060 sq. ft.) and temporary tensile structure would continue to be used without an increase in capacity.

TSA passenger and baggage screening checkpoints would not be improved. The existing aircraft apron area which limits aircraft ingress and egress and which has limited control of de-icing fluids would continue to be used. The MMH ARRF equipment would remain in a rented aircraft hangar with inefficient access to the taxiways and runway. The No Action Alternative does not achieve the Step-One or Step-Two screening criteria; however, it is retained for further analysis in this EA pursuant to CEQ regulations at 40 CFR § 1502.14(d).

2.4.3 Summary of Impacts and Alternatives

Table 2-2 provides a summary of alternatives carried forward for analysis from Section 2.4 and the environmental impact analysis results from Chapter 4, Environmental Consequences.

Table 2-2 Summary Comparisons of Alternatives

Resource Category	Proposed Action Alternative	No Action Alternative
Air Quality	The project emissions do not exceed the <i>de minimis</i> thresholds, therefore it is presumed to conform to the State Implementation Plan and conformity determination requirements do not apply.	Incremental aircraft emission increases independent of the Proposed Action; no new construction impacts.
Biological Resources	The Proposed Action would have <i>no effect</i> on federally-listed species or designated critical habitat. Migratory birds protected by the Migratory Bird Treaty Act are unlikely to be attracted to the project area as suitable habitat is limited.	Airport operations would continue under current conditions including keeping ground cover vegetation at height of 6-12 inches: no federally listed species have the potential to occur on the site due to the lack of suitable habitat.
Hazardous Materials/Solid Waste	Hazardous materials, including firefighting chemicals, would be stored in the proposed maintenance facility; de-icing fluids would be captured on a de-icing apron and the waste transported to a licensed facility with sufficient capacity; quantities of solid waste would slightly increase and would be disposed at a licensed facility with sufficient capacity.	Hazardous materials would be stored and utilized on MMH consistent with recommended or permitted techniques. Firefighting chemicals would remain stored in an aircraft hangar; dispensed de-icing fluids would continue to be collected on the commercial aircraft apron and allowed to evaporate.
Cultural/Historical Resources	There are no recorded archaeological resources within the APE.	No ground disturbing activities would occur on the site.
DOT Section 4(f)	Airport Road extension would use an existing right-of-way underlain by land administered by the U.S. Forest Service, Inyo National Forest.	Existing right-of-way on U.S. Forest Service lands would remain undeveloped.

Resource Category	Proposed Action Alternative	No Action Alternative
Natural Resources/Energy Supply	Increase in use of electricity and propane gas; consumption of building materials.	No construction materials would be consumed; no significant increase in the use of electricity or propane gas. Existing buildings are less energy efficient than those in the Proposed Action Alternative.
Socioeconomics/ Environmental Justice	Would not affect low-income or minority residents; because there are no residences or schools on or near MMH, would not be a risk to children's environmental health and safety. May increase Town's tax base from retail sales.	No low-income and minority residents and businesses near the Airport; no existing risk to children's environmental health and; opportunity to expand the Town's tax base through expanded retail space would not be available.
Visual Effects	Increase in lighting, new buildings could be seen from multiple vantage points. No significant impact on sensitive receptors.	Overall visual landscape would not be affected.
Water Resources: Groundwater	Use existing water supply from two wells; new self-contained wastewater treatment and leach field would be constructed in accordance with Mono County environmental health requirements.	Existing groundwater supplies would not be affected; two existing potable water supply wells and the existing waste water disposal fields would continue to be used.

2.5 APPLICABLE LAWS AND REGULATIONS

Pursuant to FAA Order 1050.1F, the applicable federal statutes, regulations, executive orders, Department of Transportation orders for the alternatives considered in this DEA are listed below.

2.5.1 Federal Statutes

Airport and Airway Improvement Act of 1982 (Public Law 97-248). Airport and Airway Revenue Act of 1987 (Public Law 100-223, Title IV). Airport Noise and Capacity Act of 1990 (Public Law 101-508; 49 USC App. 2151, et seq.), now recodified as 49 USC, App. 4752, et seq.

Airports and Airway Safety, Capacity, Noise Improvement, and Intermodal Transportation Act of 1992 (Public Law 102-581 and Public Law 103-13; 49 USC Section 47101, et seq.) (recodified from and formerly known as "Airport and Airway Safety and Capacity Expansion Act of 1987" (Public Law 100-223).

Archaeological and Historic Data Preservation Act of 1974 (Public Law 86-253, as amended by Public Law 93291, 16 USC 469).

Aviation Programs: Subtitle VII, Title 49 U.S. Code (USC) (Section 40101, et seq.) recodified from, and formerly known as the “Federal Aviation Act of 1958” as amended (Public Law 85-726).

Aviation Safety and Noise Abatement Act of 1979 (Public Law 96-193; 49 USC App. 2101) 49 USC 7501, et seq.

Clean Air Act (As amended by Public Law 91-604; 42 USC 7401, et seq.).

Clean Water Act (Public Law 92-500, 33 USC 1251, et seq.).

Coastal Zone Management Act of 1972 (Public Law 92-583; 16 USC 1451-1464).

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by Community Environmental Resource Facilitation Act (CERFA), October 1992. 42 USC 9601, et seq.

Department of Transportation Act of 1966 (49 USC 303), recodified from and formerly known as Section 4(f) (Public Law 89-670).

Endangered Species Act of 1973 (Public Law 85-624; 16 USC 661, 664, 1008 note).

Farmland Protection Policy Act (Public Law 97-98 and 7 Code of Federal Regulations [CFR] Part 658).

Federal Land Policy and Management Act of 1976 (Public Law 94-579; 43 USC 1701 et seq.), Section 201(a).

Federal Water Pollution Control Act Amendments of 1972, Section 404 (Public Law 92-500; 33 USC 1344), as amended by the Clean Water Act of 1977 (Public Law 95-217; 33 USC 1251).

Land and Water Conservation Fund Act (Public Law 88-578); 16 USC 460I-8(f)(3).

National Environmental Policy Act of 1969 (NEPA, Public Law 91-190; 42 USC 4321, et seq.) as amended by Public Law 94-52, Public Law 94-83, and Public Law 97-258, 4(b).

National Historic Preservation Act of 1966, Section 106 (Public Law 89-665; 16 USC 470(f)).
Noise Control Act of 1972 (Public Law 92-574; 42 USC 4901).

Resource Conservation and Recovery Act of 1976 (Public Law 94-580; 42 USC 6901 et seq.) as amended by the Solid Waste Disposal Act of 1980 (Public Law 96-482); and the 1984 Hazardous and Solid Waste Amendments (Public Law 98-616).

Uniform Relocation and Real Property Acquisition Policies Act (Public Law 91-528; 42 USC 4601).

Water Bank Act (Public Law 91-559; 16 USC 1301 note), Section 2.

Wild and Scenic Rivers Act (16 USC 1274, et seq.).

2.5.2 Federal Regulations

7 CFR Part 657 (43 Federal Register [FR] 4030, January 31, 1978), Prime and Unique Farmlands.

15 CFR Part 930 Federal Consistency with Approved Coastal Management Programs and Subpart D, Consistency for Activities Requiring a Federal License or Permit.

36 CFR Part 59 (July 1, 1996), Land and Water Conservation Fund Program of Assistance to States; Post-Completion Compliance Responsibilities.

36 CFR Part 800 (39 FR 3365, January 25, 1974, and 51 FR 31115, September 2, 1986), Protection of Historic Properties.

49 CFR Part 17, Intergovernmental Review of DOT Programs and Activities.

49 CFR Part 18 (March 11, 1988), Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Government.

49 CFR Part 24 (March 2, 1989), Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs.

40 CFR Part 51, Subpart 7, Transportation Conformity.

40 CFR Part 93.153, Subpart B (58 FR 63247, November 30, 1993), Determining Conformity of General Federal Action to State or Federal Implementation Plans.

40 CFR Parts 1500-1508, CEQ implementation of NEPA procedural provisions establishes uniform procedures, terminology, and standards for implementing the procedural requirements of NEPA's Section 102(2).

50 CFR Part 17.11, 17.12 (Subpart B), (May 31, 1997), Endangered and Threatened Wildlife and Endangered and Threatened Plants.

2.5.3 Federal Executive Orders

Promoting Energy Independence and Economic Growth, Executive Order 13783, March 28, 2017

Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Executive Order 12898.

Federalism, Executive Order 13132, August 4, 1999.

Flood Hazard Evaluation Guidelines, Executive Order 11296. Floodplain Management,

Mammoth Yosemite Airport, Terminal Area Development Project Draft Environmental Assessment
Executive Order 11988 (43 FR 6030), Protection of Wetlands, Executive Order 11990.

Intergovernmental Review of Federal Programs, Executive Order 12372 (dated July 14, 1982).

Invasive Species, Executive Order 13112, February 3, 1999.

Protection and Enhancement of Environmental Quality, Executive Order 11514 (dated March 4, 1970).

Protection and Enhancement of the Cultural Environment, Executive Order 11593 (dated May 13, 1971).

President's 1979 Environmental Message Directive on Wild and Scenic Rivers (dated August 2, 1979).

2.5.4 U.S. Department of Transportation and FAA Orders

FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, July 16, 2015.

FAA Order 1100.154A, Delegation of Authority, June 1990.

FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures, January 28, 2004.

FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, April 28, 2006.

Order DOT 5660.1A, Preservation of the Nation's Wetlands (dated August 24, 1978).

Order DOT 5301.1, Department of Transportation Programs, Policies and Procedures Affecting American Indian, Alaska Native, and Tribes; November 6, 1999.

Order DOT 5610.2, Environmental Justice in Low-Income Populations and Minority Populations, April 15, 1997.

Order DOT 5650.2, Floodplain Management and Protection (dated April 23, 1979).

Order DOT 5610.1C, Procedures for Considering Environmental Impacts (44 FR 56420, October 1, 1979), and Order DOT 5610.1, Changes 1 and 2 (July 13, 1982 and July 30, 1985).

CHAPTER 3.0: AFFECTED ENVIRONMENT

3.1 INTRODUCTION

This EA was prepared using CEQ Regulations adopted on November 28, 1978. On July 16, 2020 the CEQ promulgated revised regulations implementing NEPA (40 CFR Parts 1500-1508) that became effective on September 14, 2020. This EA was already in progress before CEQ's final rule was published in the Federal Register (85 FR 43304). Accordingly, the EA was prepared in compliance with the previous version of the regulations, 40 CFR Parts 1500-1508) (1978, as amended in 1986 and 2005).

CEQ Regulations, 40 CFR Parts 1500-1508, as referenced in Section 1.1, state that the effects on the human environment shall be interpreted to include the natural and physical environment and the relationship of present and future generations of Americans with that environment. This chapter describes the existing physical and natural environment that the Proposed Action, No Action, and reasonable alternatives may affect. The amount of information provided on a potentially affected resource is proportional to the extent of the potential impact.

All of the proposed improvements would be built within the existing Airport boundaries shown in Exhibit 1-2, which is the study area for the environmental effects of the project unless otherwise noted. The following review of the environmental conditions follows the sequence of resources listed in the FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, in paragraph 4-1, as follows:

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, Pollution Prevention
- Historical, Architectural, Archaeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources
 - Wetlands
 - Floodplains
 - Surface Waters
 - Groundwater
 - Wild and Scenic Rivers

3.2 Environmental Resources Not Affected

FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* directs that the amount of information provided on a potentially affected resource is proportional to the extent of the potential impact. In accordance with guidance provided in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, the following environmental resources are not present within the study area and, therefore, would not be affected by the Proposed Action Alternative or the No Action Alternative. For these reasons, they are eliminated from further consideration.

Coastal Resources: The Airport is located approximately 175 miles east of the Pacific Ocean and is not located in a coastal zone.

Farmlands: The study area does not contain land designated as prime, unique or statewide and locally important farmland. There are no soil units in Mono County, where the study area is located, that qualify as prime, unique, statewide or locally important, as identified by the State of California's Farmland Mapping and Monitoring Program based on soil survey information by the Natural Resources Conservation Service.

Water Resource – Wild and Scenic Rivers: The Wild and Scenic Rivers Act of 1958, as amended, describes those river segments designated as, or eligible to be included in, the Wild and Scenic Rivers System. The closest Wild and Scenic River is the Owens River Headwaters, which is about 10 miles northwest of the Airport.¹

Water Resource – Wetlands: The Clean Water Act defines wetlands as "...those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." Survey identified no presence of wetlands or other waters of the United States in the study area." (Biological Resources Assessment, Appendix B)

Water Resource – Floodplains: The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map published for the vicinity of the Airport, included as Appendix C, indicates that no portion of Airport property is located within a floodplain.

Water Resource – Surface Waters: As defined by FAA Order 1050.1F Desk Reference Section 14.3, surface waters include streams, rivers, lakes, ponds, estuaries, and oceans. The Biological Resources Assessment for the study area, available in Appendix B, did not identify the presence of any surface waters.

3.3 Affected Environmental Resources

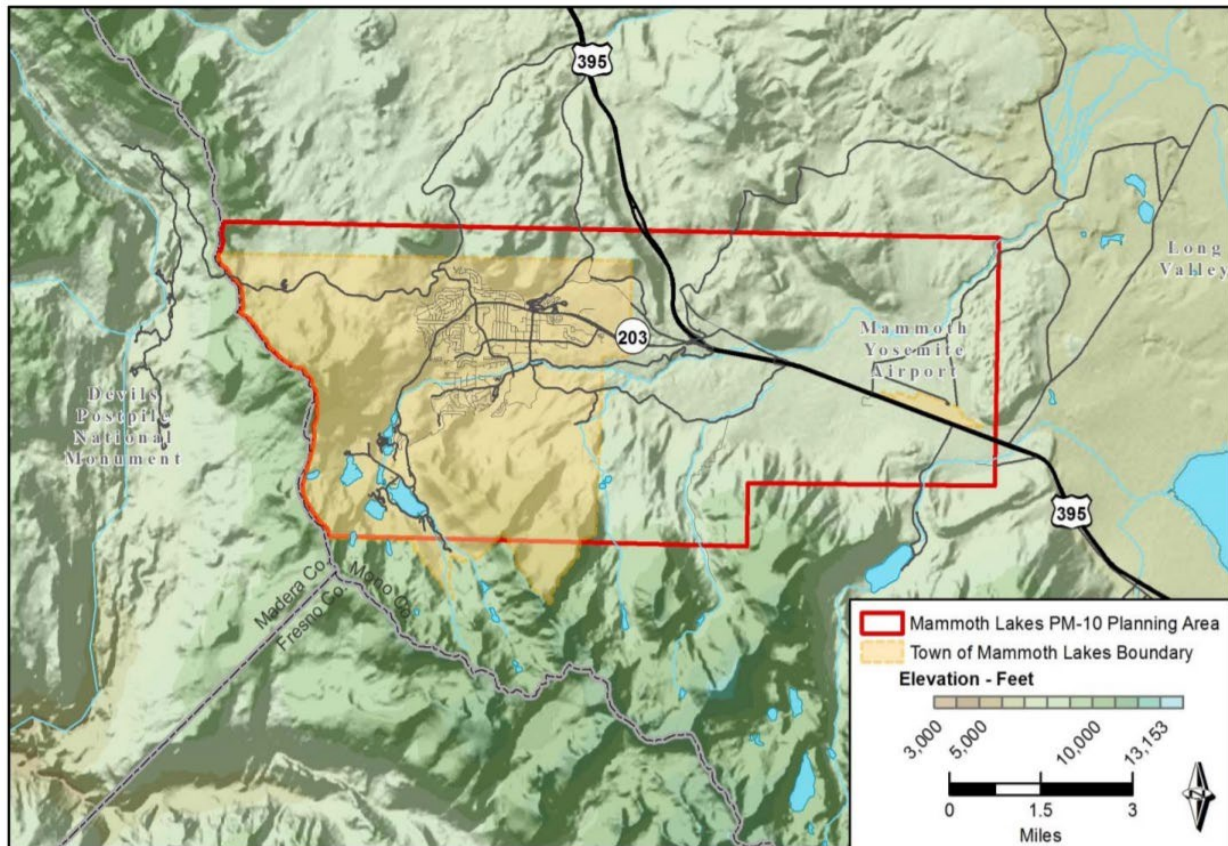
Exhibit 1-1 shows the location of the airport relative to regional features. The impacts of construction and operation of the Proposed Action and any reasonable alternatives may differ for each environmental resource. For that reason, the affected environment for each resource is described individually in the following sections.

¹ National Wild and Scenic Rivers System, Retrieved November 2019, from <https://www.rivers.gov/california.php>.

3.3.1 Air Quality

The Clean Air Act (CAA) (42 U.S.C. §§ 7401-7671q) is the primary federal statute which addresses air quality. The U.S. Environmental Protection Agency (USEPA) sets National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The potentially affected environment for the air quality analysis consists of the Mammoth Lakes Planning Area, as designated by the Great Basin Unified Air Pollution Control District (District) and as shown in Exhibit 3-1.

Exhibit 3-1 Mammoth Lakes Planning Area and Town of Mammoth Lakes Boundary



Source: Great Basin Unified Air Pollution Control District, 2017

3.3.1.1 National and California Ambient Air Quality Standards

The USEPA has established NAAQS for the following six “criteria” pollutants based on human health-based and/or environmental (science-based) criteria. The USEPA regulates these pollutants by developing guidelines for setting permissible levels:

Carbon monoxide (CO)

Ozone (O₃)

Lead (Pb)

Particulate matter (PM₁₀ and PM_{2.5})

Nitrogen dioxide (NO₂)

Sulfur dioxide (SO₂)

Table 3-1 shows federal and California ambient air quality standards. California standards, established by the California Clean Air Act, include four other criteria pollutants besides the six under the federal Clean Air Act. There are no federal standards for these four additional pollutants.

Table 3-1 National and California Ambient Air Quality Standards

US Environmental Protection Agency (January 19, 2017) Criteria Air Pollutants. Retrieved September 2019, from <https://www.epa.gov/criteria-air-pollutants>.

Air Pollutant	Averaging Time	California Standards	Primary National (NAAQS) Standards ¹	Secondary National Standards ²
Ozone	1 Hour	0.090 ppm	--	--
	8 Hour	0.070 ppm	0.070 ppm	0.070 ppm
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	--
	Annual Mean	20 µg/m ³	--	--
PM _{2.5}	24 Hour	--	35 µg/m ³	35 µg/m ³
	Annual Mean	12 µg/m ³	12 µg/m ³	15 µg/m ³
Sulfate	24 Hour	25 µg/m ³	--	--
Carbon Monoxide	1 Hour	20 ppm	35 ppm	--
	8 Hour	9 ppm	9 ppm	--

Air Pollutant	Averaging Time	California Standards	Primary National Standards ¹	Secondary National Standards ²
Nitrogen Dioxide	1 Hour	0.18 ppm	100 ppb	--
	Annual Mean	0.030 ppm	53 ppb	53 ppb
Sulfur Dioxide	1 Hour	0.25 ppm	75 ppb	--
	3 Hour	--	--	0.5 ppm
	3 Month Average	--	0.15 µg/m ³	0.15 µg/m ³
Lead	30 Day Average	1.5 µg/m ³	--	--
	Calendar Quarter		1.5 µg/m ³	1.5 µg/m ³
	3 Month Average		0.15 µg/m ³	0.15 µg/m ³
Hydrogen Sulfide	1 Hour	0.03 ppm	--	--
Vinyl Chloride	24 Hour	0.01 ppm	--	--
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer	--	--
Notes: ppm – parts per million; ppb – parts per billion; µg/m³ – micrograms per cubic meter; N/A – not applicable ¹ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health. ² National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. * For certain areas.				

Aircraft, aircraft support equipment, and surface vehicles typically generate the most criteria pollutant emissions at an airport. These are the main pollutant sources at MMH. An airport sponsor does not control these sources, which are operated by corporate entities and private individuals.

3.3.1.2 General Conformity and the State Implementation Plan

Geographic areas found to be in violation of one or more NAAQS are designated as “nonattainment” areas. Nonattainment designations can be marginal, moderate, serious, severe, or extreme, depending on the degree to which they exceed the NAAQS. Areas where concentrations of the criteria pollutants are below the NAAQS are “attainment” areas for those pollutants. Areas with prior nonattainment status that have since transitioned to attainment are designated as maintenance areas.

States having nonattainment areas must develop a State Implementation Plan (SIP) that demonstrates how the area will be brought back into attainment of the NAAQS within designated timeframes. The California Air Resources Board (ARB) develops the SIP for nonattainment areas in the State.

Table 3-2 summarizes the attainment status of the Mammoth Lakes Planning Area for all federal and California criteria pollutants, based on their respective ambient air quality standards. On November 15, 1990, the Mammoth Lakes Planning Area was designated as a moderate nonattainment area for the 24-hour PM₁₀ Federal Standard (56 FR 11101). On November 4, 2015, the Mammoth Lakes area received re-designation as a Maintenance area for this standard.² The Mammoth Lakes Planning Area is in Attainment status for all other criteria pollutants, except Ozone, 8-hour.

Table 3-2 Federal and State Attainment Status

Pollutant	Designation	
	Federal	California
Carbon monoxide (CO)	Attainment	Attainment
Lead (Pb)	Attainment	Attainment
Nitrogen dioxide (NO ₂)	Attainment	Attainment
Ozone (O ₃), 8-Hour (2008)	Attainment	Nonattainment
Particulate Matter (coarse or PM ₁₀)	Attainment/Maintenance	Nonattainment
Particulate Matter (fine or PM _{2.5})	Attainment	Attainment
Sulfur dioxide (SO ₂)	Attainment	Attainment
Hydrogen sulfide (H ₂ S)	No standard	Attainment
Sulfates	No standard	Attainment
Vinyl chloride	No standard	Attainment
Visibility Reducing Particles	No standard	Unclassified

Note: "Unclassified" means data do not support a designation of attainment or nonattainment.

² US Environmental Protection Agency (2019, August 31) Greenbook, California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. Retrieved September 2019, from https://www3.epa.gov/airquality/greenbook/anayo_ca.html.

3.2.1.3 Air Quality Monitoring

The District maintains a network of air quality cameras and monitoring stations throughout Alpine, Mono, and Inyo Counties. These monitors record concentrations of pollutants in the ambient air to determine compliance with the NAAQS. The closest monitoring station to the Airport is in the Town of Mammoth Lakes, which has monitored PM₁₀ since 1979. Air quality monitoring data from this monitoring station show no exceedance of the PM₁₀ NAAQS or CAAQS except during July and August 2018, a peak wildfire season.

3.3.2 Biological Resources

Potentially affected environment for biological resources includes the study area as shown in Exhibit 3-2. Field assessments of the study area were conducted by Salix Consulting principal biologist Jeff Glazner on September 16 and 17, 2019. The field study assessed the potential for sensitive plants and wildlife. During field assessments, biological communities were mapped and assessed for the potential to support special status species; plants and animals that were observed were documented and ground photographs taken. An unmanned aerial vehicle was deployed to obtain orthomosaic and oblique aerial photographs of the study area. The results of the field assessment are described in its January 2020 (revised April 2021) report *Biological Resources Assessment for the ±24-Acre Mammoth Yosemite Airport Terminal Area Development Plan Study Area*, (Biological Resources Assessment). Appendix B contains the Biological Resources Assessment.

The primary biological community within the project area is sagebrush scrub. The project area also contains three other distinct areas: pavement, disturbed areas and some minor structures. The unpaved areas of the study area are composed of sagebrush scrub, characterized by low, generally sparse shrubs and native and weedy herbaceous species. Common species include sagebrush (*Artemisia tridentata*), antelope bush (*Purshia tridentata*), rubber rabbitbrush (*Ericameria nauseosa*), Parry's rabbitbrush (*E. parryi*), desert peach (*Prunus andersonii*), tumbleweed (*Salsola tragus*), and cheatgrass (*Bromus tectorum*). There are also a few ornamental trees. Vegetation covers less than 50% of the study area.

Wildlife species occur throughout the area, but they are generally transient foragers that do not linger. Tracks of mule deer were present, although no mule deer were observed during the site visits. Other mammal tracks were observed but not identified. Bird utilization was low during the two-day site visit. Species observed included Brewer's blackbird, northern flicker, spotted towhee, California scrub-jay, common raven, dark-eyed Junco, house sparrow, red-tailed hawk, turkey vulture, house finch, green-tailed towhee, northern mockingbird, and mourning dove. Rodent burrows were observed, but other than golden mantled ground squirrel, few live animals were observed.

An official list of threatened and endangered species for the project area was obtained from the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) database (April 2021). Table 3-3 lists federally threatened or endangered species known or with potential to occur within a five-mile radius of the Airport and the likelihood of their occurrence within the study area.

During the database queries and field study, it was determined that none of the identified thirteen



EXHIBIT 3-2

**Draft Environmental Assessment
Terminal Area Development Project
Area of Potential Effect and
Study Area**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

Project Layout from:
*Mammoth Yosemite Airport Terminal Area
Development Plan*, January 2015
Image Source: GoogleEarth

federally listed sensitive plant or animal species identified in Table 3-3 were present in the areas examined. It was also determined that no federally listed species have potential to occur within or adjacent to the study area due to the absence of suitable habitat needed for their survival.

Table 3-3 Federally Threatened, Endangered and Proposed Threatened/Endangered Species and Designated Critical Habitat within Five Miles of the Mammoth Yosemite Airport

Species	Federal Status*	Preferred Habitat	Critical Habitat Present?	Potential for Occurrence
Plants				
Whitebark pine (<i>Pinus albicaulis</i>)	C	Upper coniferous forest; subalpine forest	None	None. No forest occurs within the Action Area, or immediately adjacent to the airport property. Study Area occurs below the local elevational range of the species.
Fish				
Lahontan cutthroat trout (<i>Oncorhynchus clarkii henshawi</i>)	T	Historically found in all cold waters of the Lahontan Basin, including Independence Lake.	None	None. No suitable aquatic habitat occurs within the Study Area.
Owens tui chub (<i>Siphateles bicolor snyderi</i>)	E	Three existing natural populations: at the Owens River Gorge, at source springs of CDFW Hot Creek Hatchery, and a pond and ditches at Cabin Bar Ranch near Owens Dry Lake. Other populations have been established with landowners in the region.	±1-mile NW of Study Area (Hot Creek).	None. No suitable aquatic habitat occurs within the Study Area. Critical Habitat in Hot Creek more than one mile northwest of the Study Area.
Owens pupfish (<i>Cyprinodon radiosus</i>)	E	Spring pools, sloughs, irrigation ditches, swamps, and flooded pastures in the Owens Valley from Fish Slough in Mono County to Lone Pine in Inyo County. Currently confined to five populations in the Owens Valley.	None	None. No suitable aquatic habitat occurs within the Study Area.

Species	Federal Status*	Preferred Habitat	Critical Habitat Present?	Potential for Occurrence
<i>Amphibians and Reptiles</i>				
Sierra Nevada yellow-legged frog (<i>Rana sierrae</i>)	E	Associated with streams, lakes, and ponds in montane riparian, lodgepole pine, subalpine conifer and wet meadow habitats. Occurs in the northern and central portions of the Sierra Nevada at elevations above 4,500 feet. Always near water.	None	None. No suitable habitat occurs within the Study Area
Yosemite toad (<i>Anaxyrus canorus</i>)	T	Endemic to California. Alpine County south to Fresno County at high elevations in the Sierra Nevada mountains. Inhabits wet mountain meadows and the borders of forests. 4,800 -12,000 ft.	None	None. No suitable habitat occurs within the Study Area
<i>Mammals</i>				
Sierra Nevada bighorn sheep (<i>Ovis canadensis sierrae</i>)	E	Typical terrain is rough, rocky and steep; also encompasses alpine meadows, summit plateaus, and hanging meadows fed by springs within escape terrain. Summer range is 10,000-14,000 ft. Winter range typically 5,000-9,000 ft.	NE boundary of Critical Habitat is ± 2.5 miles south of Action Area	None. No suitable habitat within or near Study Area
North American wolverine (<i>Gulo gulo luscus</i>)	PT	Habitat generally consists of open terrain above the timberline but has been observed at 1500 feet. Prefers areas with low human disturbance. Uses caves, hollows in cliffs, logs, rock outcrops, and burrows for cover, generally in denser forest stages.	None	None. No suitable habitat within or near Study Area. Proximity to human activity also precluded occurrence.
Fisher (<i>Pekania pennanti</i>)	E	Occurs in coniferous forests; riparian woodlands with a high percent level of canopy closure.	None	None. No suitable habitat within or near Study Area.

Species	Federal Status*	Preferred Habitat	Critical Habitat Present?	Potential for Occurrence
Birds				
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	E	Occurs in dense riparian thickets and riparian woodlands usually within the first 10 13 feet above the ground. Typical range is southwestern United States and northwestern Mexico.	None	None. No suitable habitat within or near Study Area.
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	T	Occurs in riparian woodlands and thickets and in willow groves around marshes. In the western US, mostly in streamside trees, including cottonwood-willow groves in arid environments.	None	None. No suitable habitat within or near Study Area.
Insects				
Monarch butterfly (<i>Danaus plexippus</i>)	C	Occurs only with milkweed (<i>Asclepias</i>), the host plant. Milkweed occurs as a widespread weedy species found along fence rows and pastures.	None	None. No suitable habitat within or near Study Area.
*STATUS: E- Endangered; T – Threatened; C – Candidate; PE – Proposed Endangered; PT- Proposed Threatened				

3.3.3 Climate

Research has shown there is a direct correlation between hydrocarbon fuel combustion and Greenhouse gas (GHG) emissions that trap heat in the earth's atmosphere. Climate change is a global phenomenon; therefore, the potentially affected environment for climate is the entire world. As noted in FAA Order 1050.1F Desk Reference Section 3.2, for FAA project-level actions, the affected environment for climate is highly dependent on the project itself and is defined as the entire geographic area that could be either directly or indirectly affected by the Proposed Action. For this project, this would be the study area defined in Exhibit 3-1. Analysis of GHG emissions is quantitatively assessed in certain circumstances, but otherwise may be qualitatively assessed.

The U.S. Government Accountability Office reports that “domestic aviation contributes about three percent of total carbon dioxide emissions, according to USEPA data,” compared with other industrial sources, including the remainder of the transportation sector (20 percent) and power generation (41 percent). The International Civil Aviation Organization (ICAO) estimates that GHG emissions from aircraft account for roughly three percent of all anthropogenic GHG emissions globally. Aircraft, aircraft support equipment, and surface vehicles typically generate the most GHG emissions at an airport. These are the main GHG emission sources at MMH as well. An airport does not control these

sources, which are operated by corporate entities and private individuals.

The scientific community is continuing efforts to understand the impact of aviation emissions on the global atmosphere more fully. The FAA is leading and participating in a number of initiatives intended to clarify the role that commercial aviation plays in GHG emissions and climate. The FAA, with support from the U.S. Global Change Research Program and its participating federal agencies (the National Aeronautics and Space Administration, National Oceanic and Atmospheric Administration, USEPA, and U.S. Department of Energy) has developed the Aviation Climate Change Research Initiative to advance scientific understanding of regional and global climate impacts from aircraft emissions. The FAA also funds the Partnership for Air Transportation Noise & Emissions Reduction Center of Excellence research initiative to quantify the effects of aircraft exhaust and contrails on global and U.S. climate and atmospheric composition. The ICAO is examining similar research topics at the international level.³

For FAA project-level actions, the affected environment for climate is highly dependent on the project itself and is defined as the entire geographic area that could be either directly or indirectly affected by the Proposed Action. For airport actions, the study area is defined by the extent of the project changes (*i.e.*, immediate vicinity of the airport) and should reflect the full extent of aircraft movements as part of the project changes. Analysis of GHG emissions are quantitatively assessed in certain circumstances, but otherwise may be qualitatively assessed.

3.3.4 U.S. Department of Transportation Act, Section 4(f) and Section 6(f) of the Land and Water Conservation Fund

U.S. Department of Transportation Act of 1966 (now codified as 49 U.S.C. § 303), Section 4(f) provides protection for special properties, including publicly owned parks, recreation areas, wildlife and waterfowl refuges, multi-land use properties such as National Forests or any historic and archaeological sites. Section 6(f) of the Land and Water Conservation Fund, 16 U.S.C. § 4601-8(f) applies if property was acquired or developed with financial assistance under the Land and Water Conservation Fund State Assistance Program.

In 1984, when Mono County (County) owned and operated the Airport, the County executed a permanent easement with the Forest Service (U.S. Department of Agriculture, Inyo National Forest) for a road/highway right-of-way for what is now Airport Road, from Hatchery Creek Road to the old Convict Lake Road. The purpose of the easement on Section 4(f) property was for public access to a public use airport. Therefore, the County acquired a permanent interest for the use and maintenance of some portion of National Forest property that disrupted a portion (10.5- acres) of the Forest Service's Section 4(f) function. However, an 860-foot section of Airport Road within the right-of-way, as shown in Exhibit 3-3, was not paved but continued to function as part of National Forest land in the same manner as it did before the easement was executed. The 860-foot easement is underlain by land administered by the Inyo National Forest and is proposed to be paved as an extension of Airport Road as part of the TADP.

³ Maurice, L. Q., & Lee, D. S. (2007). Aviation Impacts on Climate. In International Civil Aviation Organization, Final Report of the



EXHIBIT 3-3

**Draft Environmental Assessment
Terminal Area Development Project
U.S. DOT Section 4(f)
Airport Road Extension**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

Project Layout from:
*Mammoth Yosemite Airport Terminal Area
Development Plan*, January 2015
Image Source: GoogleEarth

Interactional Civil Aviation Organization Committee on Aviation and Environmental Protection Workshop (pp. 25-32). Washington, DC and Manchester: U.S. Federal Aviation Administration and Manchester Metropolitan University. Retrieved March 2018.

Other potential Section 4(f) properties near the study area include the Whitmore Recreation Area, managed by the Town, Hot Creek Ranch (fly fishing recreation area), Hot Creek Trout Fish Hatchery, Convict Lake Campground and other campgrounds near Lake Crowley, as shown on Exhibit 3-4. None of these recreation properties are directly or indirectly affected by the proposed action.

3.3.5 Hazardous Materials, Solid Waste, and Pollution Prevention

The use, transport, storage and disposal of hazardous materials and solid waste are heavily regulated. In a regulatory context, the terms “hazardous wastes,” “hazardous substances,” and “hazardous materials” have very specific meanings, as described below.

- **Hazardous Wastes.** Subpart C of the Resource Conservation and Recovery Act (RCRA) defines hazardous wastes (sometimes called characteristic wastes) as solid wastes that are ignitable, corrosive, reactive, or toxic. Examples include waste oil, mercury, lead, or battery acid. In addition, the USEPA has determined specific types of solid wastes to be hazardous. Examples include degreasing solvents, petroleum refining waste, or pharmaceutical waste.
- **Hazardous Substances.** Section 101(14) of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) defines this term broadly to include hazardous wastes, hazardous air pollutants, or hazardous substances designated under the Clean Water Act (CWA) and the Toxic Substances Control Act (TSCA). These substances include elements, compounds, mixtures, or solutions, or substances that pose substantial harm to human health or environmental resources. Hazardous substances do not include petroleum or natural gas or materials such as ammonia, bromine, chlorine, or sodium cyanide.
- **Hazardous Materials.** According to 49 CFR Part 172, hazardous materials are any substances commercially transported that pose unreasonable risk to public health, safety, and property. These substances include hazardous wastes and hazardous substances, petroleum and natural gas substances, and materials such as household batteries, gasoline, and fertilizers.

As noted previously, the potentially affected environment is limited to the study area shown in Exhibit 3-2. There are no RCRA, CERCLA, or hazardous material sites within the study area. The closest site listed in the USEPA’s RCRA database is Hot Creek Aviation LLC, located on Airport property at 1334 Airport Road west of the study area.⁴ In 1998 fuel leaks were identified from buried underground storage tanks; the tanks contained aviation fuel. The soil contamination was cleaned up and the site closed in 2006⁵. The underground storage tanks were replaced with above ground fuel storage tanks. Hot Creek Aviation LLC is the Airport’s fixed-base operator (FBO); they are listed as a handler for aviation fuel.

⁴ US Environmental Protection Agency (2019) <https://enviro.epa.gov/enviro/rcrainfoquery>, retrieved December 2019.

⁵ State Water Resources Control Board, GeoTracker, Regional Board Case Number 6B2600915T.

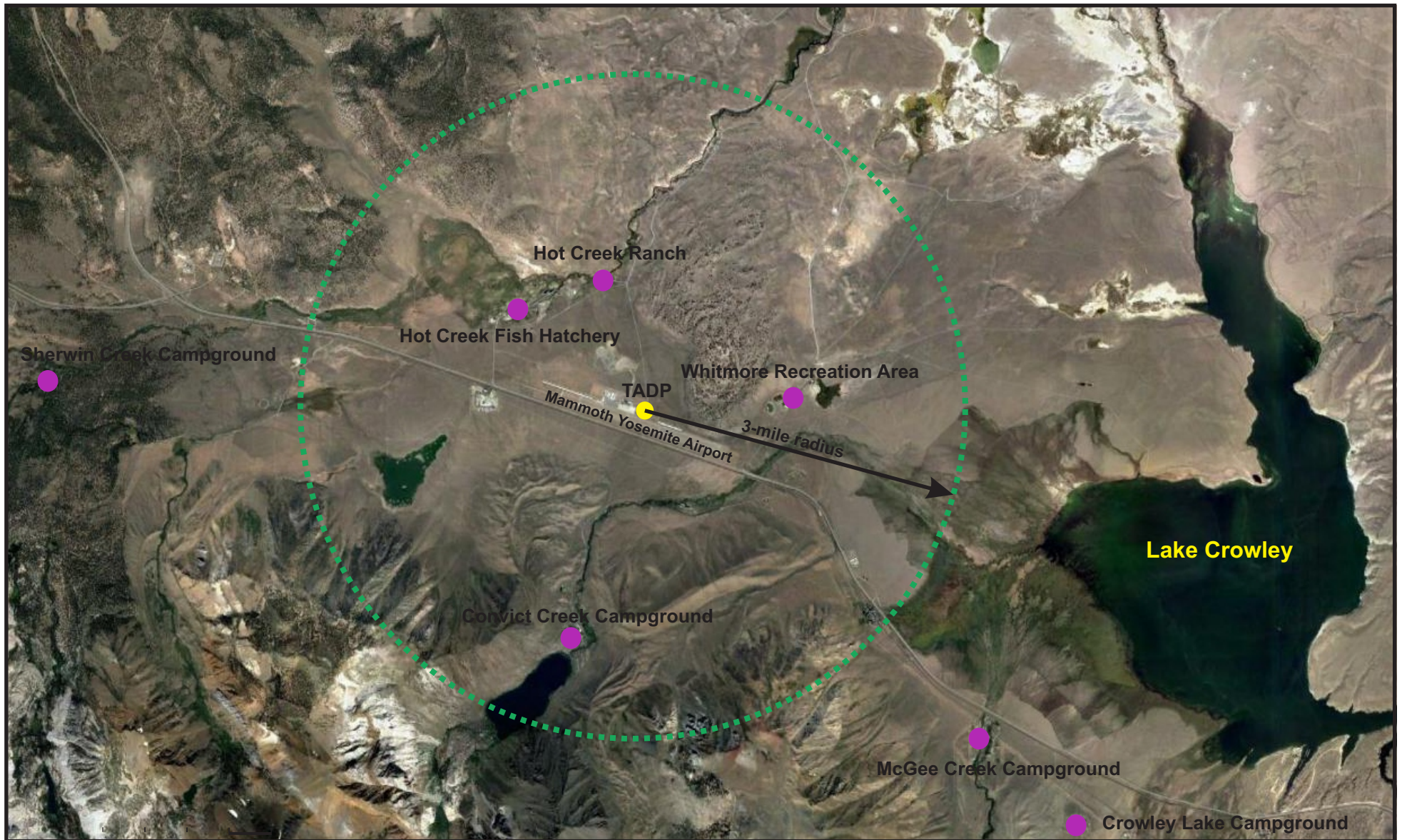


Image Source: GoogleEarth

**Draft Environmental Assessment
Terminal Area Development Project
U.S. DOT Section 4(f)
Recreation Properties
Within Vicinity of the TADP**

EXHIBIT 3-4

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

In accordance with FAA guidance, all Title 14, CFR, Part 139-certified airports are required to provide aircraft rescue and firefighting services. The FAA approved the MMH Airport Certification Manual that includes use of an ARFF vehicle that uses aqueous film-forming foam.

In accordance with FAA guidance, all Title 14, CFR, Part 139-certified airports are required to provide aircraft rescue and firefighting services. The FAA approved the MMH Airport Certification Manual that includes use of an ARFF vehicle that uses aqueous film-forming foam.

(AFFF) compounds which contain PFAS. The Lahontan Regional Water Quality Control Board (RWQCB), in consultation with the State Water Board, has made the determination that the release of PFAS into the environment constitutes a discharge of waste as defined in Water Code Section 13050(d) and is therefore a hazardous material. MMH houses and maintains one ARFF unit which is equipped with dispersal capabilities. MMH stores a maximum of 165 gallons of AFFF compounds in three 55-gallon drums in the ARFF hangar bay.

De-icing fluids are specifically formulated to assist in removing ice, snow or frost from the exterior of aircraft. The main component of de-icing fluid is a freezing point depressant, usually propylene glycol or ethylene glycol, a toxic substance. These fluids are stored and managed by the FBO and used by commercial airlines and general aviation aircraft. De-icing operations are required to obtain an industrial stormwater permit under the National Pollutant Discharge Elimination System (NPDES) program as administered by the EPA through state agencies.

Common requirements for coverage under an industrial stormwater permit include development of a written SWPPP and implementation of control measures such as the Airport Deicing Effluent Guidelines

Solid waste generated by the Airport is collected by Mammoth Disposal, Inc. and is transferred to the Benton Crossing Landfill (operated by Mono County) located approximately five miles east of the Airport. The amount of solid waste generated at the Airport varies seasonally, with the greatest amounts generated during the winter season when about 1.5 tons are disposed weekly. However, the Benton Crossing Landfill is scheduled to permanently close as of January 1, 2023. The Town and Mammoth Disposal Company renewed a Solid Waste Services Agreement (franchise agreement) on September 2, 2020, and as part of that agreement Mammoth Disposal Company is seeking a use permit for the Mammoth Disposal Transfer Station Expansion Project located at an existing transfer station facility in the eastern portion of the Town at 59 Commerce Drive. The Town anticipates that a use permit will be granted and the new transfer station building will be constructed before Benton Crossing Landfill is permanently closed.

3.3.6 Historical, Architectural, Archaeological, and Cultural Resources

The National Historic Preservation Act (NHPA) is the primary federal statute governing historic architectural, archaeological, and cultural resources. In accordance with 36 CFR § 800.16(d) the FAA established an Area of Potential Effect (APE) for the proposed undertaking. The APE is the geographic area in which direct or indirect influence could occur based upon the scale and nature of the undertaking. The APE is shown in Exhibit 3-2.

Natural Investigations Company prepared the *Cultural Resources Inventory and Effects Assessment for The Mammoth-Yosemite Airport Terminal Area Development Plan, Town of Mammoth Lakes, Mono County, California* (cultural resource inventory) in September 2019. The cultural resource inventory assessed the potential resources to be present within the APE by conducting an archival review, physical transect survey and assessing the results. Information for one potential road resource was updated during the conduct of the cultural resource inventory. No architectural or cultural resources are located within the APE.

Native American Heritage Commission search of the Sacred Lands File did not identify any known resources within the APE. On November 22, 2019, the FAA initiated consultation with the Big Pine Paiute Tribe of Owens Valley, Bishop Paiute Tribe, Bridgeport Paiute Indian Colony, Fort Independence Indian Community of Paiutes, Lone Pine Paiute-Shoshones, Mono Lake Indian Community, Southern Sierra Miwuk Nation, and the Utu Utu Gwaitu Tribe of the Benton Paiute Reservation; no responses were received.

Based upon the information contained within the cultural resource inventory report and the results of the Native American consultations the FAA determined that there are no historic properties listed or eligible for listing on the National Register of Historic Places (NRHP) within the APE. The FAA initiated consultation with the California State Historic Preservation Officer (SHPO) requesting concurrence with the APE and the FAA determination and finding of “*No Historic Properties Affected*” on February 11, 2020. On February 19, 2020, the California SHPO had no concerns with the APE and concurred with the “*No Historic Properties Affected*” finding. Copies of the consultation documents are included in Appendix D.

3.3.7 Land Use

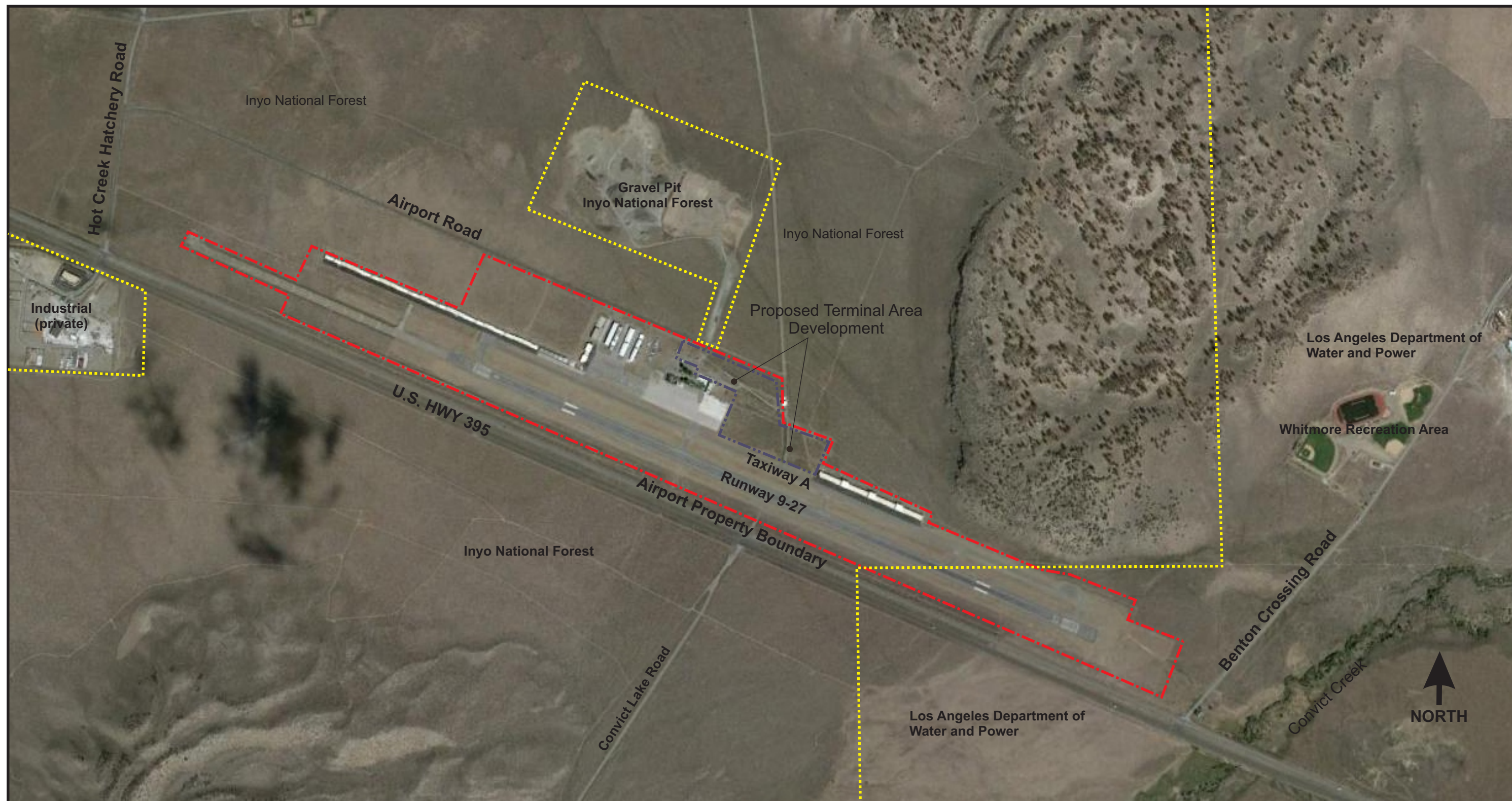
FAA Order 1050.1F Desk Reference, Section 9.2 states that:

For land use, the study area should include any areas that may be affected by the proposed action or alternative(s), including construction- related activities.

For this project, the study area is shown in Exhibit 3-5.

Affected land uses are generally related to consistency with zoning ordinances, land use plans, and land use policies for the Airport and the surrounding areas. MMH has been developed for activities associated with airport operations, such as the existing terminal building, aircraft hangars, and miscellaneous structures. This development is consistent with the Town of Mammoth Lakes General Plan land use designation of Airport and Town zoning of Airport (Exhibit 3-6). Existing development within the study area is consistent with these designations.

Land use in the immediate vicinity of the Airport, between Hot Creek and Convict Creek, includes agricultural open space (grazing) and areas zoned Resource Management by Mono County. Land north, northwest, and south of MMH is within the Inyo National Forest, managed by the U.S. Forest Service. The Airport occupies 196.23-acres owned by the Town; 33-acres leased from Los Angeles Department of Water and Power (LADWP), and 20.36-acres on the Inyo National Forest which the



Project Layout from:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2015
 Image Source: GoogleEarth

**Draft Environmental Assessment
 Terminal Area Development Project
 Land Uses in the Vicinity of the Project Area**

**Mammoth Yosemite Airport
 Town of Mammoth Lakes**

June 2021

EXHIBIT 3-5

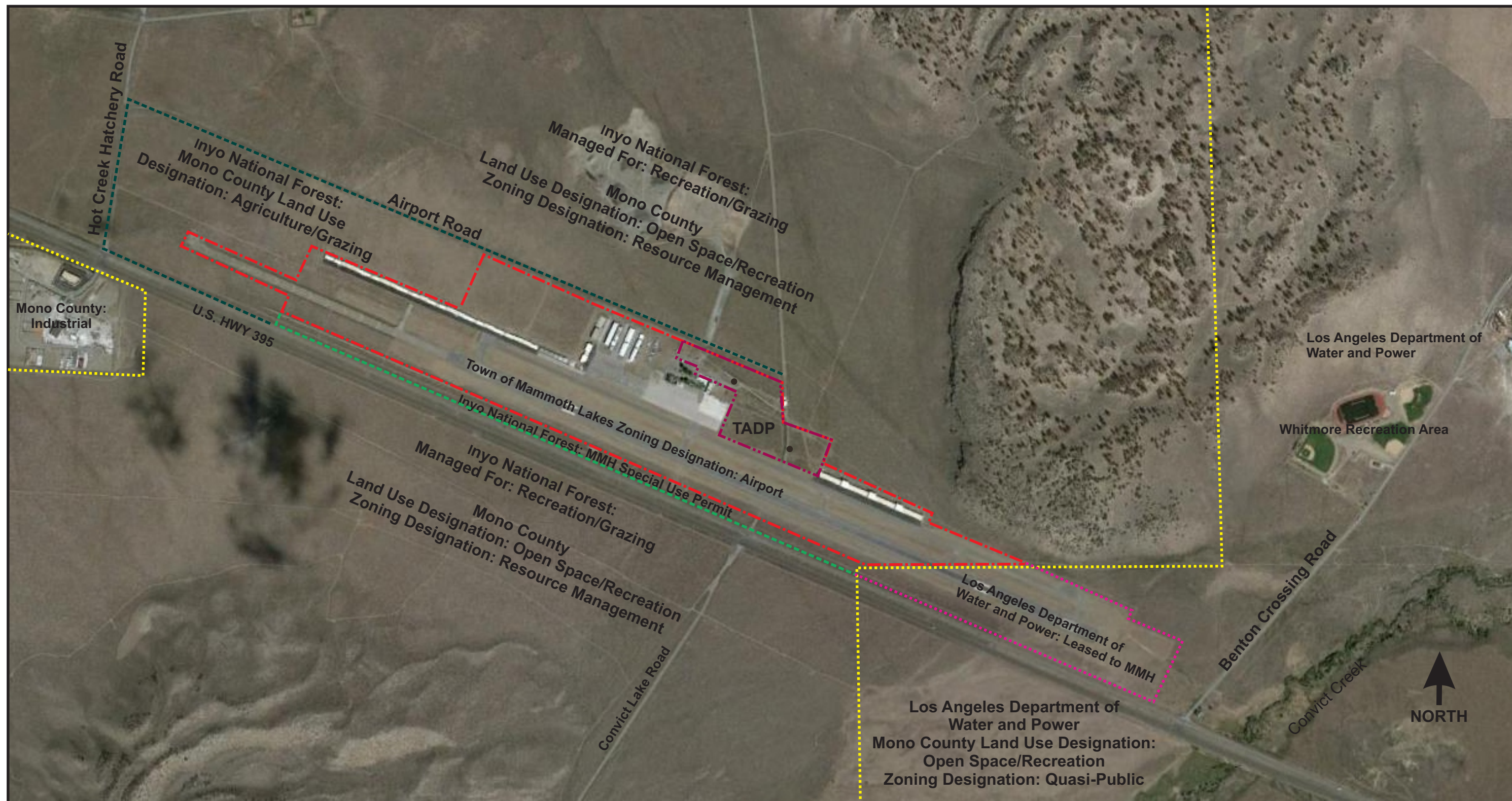


EXHIBIT 3-6

Project Layout from:
Mammoth Yosemite Airport Terminal Area Development Plan,
January 2015
Image Source: GoogleEarth

**Draft Environmental Assessment
Terminal Area Development Project
Land Uses in the Vicinity of the Project Area**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

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Airport uses under a Special Use Permit (Exhibit 3-6). The lands northeast of MMH are undeveloped and are managed by the U.S. Bureau of Land Management (BLM) or owned by the Los Angeles Department of Water and Power (LADWP). Eastern portions of MMH, including lands under a portion of Runway 9-27, are owned by LADWP; the Town of Mammoth Lakes currently leases this land.

Several small parcel lots within 1.4 miles of the study area to the west are used for public agency and industrial purposes. Hot Creek Ranch, a privately-owned fly-fishing campground, and Hot Creek Fish Hatchery are approximately one-mile northwest of the Airport. An abandoned gravel borrow pit is located north of the Airport on U.S. Forest Service land. The High Sierra Community Church, or “Green Church”, building is located on the north side of U.S. Route 395 near the intersection with Benton Crossing Road. It is no longer used for any activity.

The Sierra Nevada Aquatic Research Laboratory (SNARL) headquarters are located approximately one mile southeast of the Airport, south of U.S. Route 395 along Convict Creek. Convict Lake Recreation Area, including Inyo National Forest campgrounds and additional facilities, is approximately two miles south of the Airport. None of these land uses are within the study area or on property used by the Airport.

There are no residential areas within or in the immediate vicinity of the study area. The closest residences are approximately 1.5 miles northwest of the Airport on the Hot Creek Fish Hatchery property. The Town of Mammoth Lakes is located about 7 miles west of the Airport. No off-airport land uses would be affected by the Proposed Action or any reasonable alternatives.

3.3.8 Natural Resources and Energy Supply

The Federal government encourages airport development that minimizes the use of consumable natural resources and minimizes demands on energy supplies. FAA policy (FAA Order 1053.1C *Energy and Water Management Program for FAA Buildings and Facilities*, October 26, 2017) encourages developing facilities that use the highest design standards and that incorporate sustainable designs. Airport personnel and tenants regularly use consumable materials to maintain various airside and landside facilities and services. Those materials may include asphalt, concrete, aggregate for sub-base materials, and various materials associated with such maintenance.

Electrical power is necessary to keep the Airport operational and safe. Airport lighting within the project area consists of airfield navigational aids, runway taxiway edge lighting, landside lighting for buildings, apron areas, and automobile parking areas. Within the study area, electrical use is limited to lighting for buildings and automobile parking areas. Southern California Edison (SCE) provides electrical power to Mammoth Lakes and surrounding areas, including the Airport.

AmeriGas and Eastern Sierra Propane provide propane to the Mammoth Lakes area, which is commonly used to fuel furnaces, water heaters, and stoves.

Potable water and water used for firefighting is supplied to the Airport by two groundwater wells located east of the study area and within the airport property boundaries. Each well is 143 feet deep and is designed to pump up to 500 gallons per minute. A 428,000-gallon storage tank is used for fire and operational storage.

3.3.9 Noise and Noise Compatible Land Use

The existing noise environment in the area surrounding the Airport was evaluated based on the approximately 6,745 aircraft operations at the Airport in 2018. The airport currently serves aircraft in FAA Design Groups I and II; the Proposed Action does not change the aircraft types operating at the airport. Based on these operational figures, fleet mix data and use of a pre-approved list of aircraft substitutions, noise contours were developed using the Aviation Environmental Design Tool (AEDT) version 2d, which was the most recent version when the environmental analysis was prepared in July 2020 (Appendix E).

FAA Order 1050.1F, Appendix B, paragraph B-1, *Environmental Impacts: Policies and Procedures*, recognizes the use of the Community Noise Equivalent Level (CNEL) as an alternative metric to the Day/Night Average Sound Level (DNL) in California. The CNEL contours developed as part of the noise analysis were superimposed onto satellite imagery. Exhibit 3-7 shows the CNEL 65, 70, and 75-decibel (dB) noise contours for the year 2018, all of which are confined to Airport property.

The compatibility of existing and planned land uses with proposed aviation actions is usually determined in relation to the level of aircraft noise. Based on existing operational aircraft noise contours, there is no impact on land uses surrounding the airport. Land uses surrounding the Airport consist of primarily open space and an industrial park to the west.

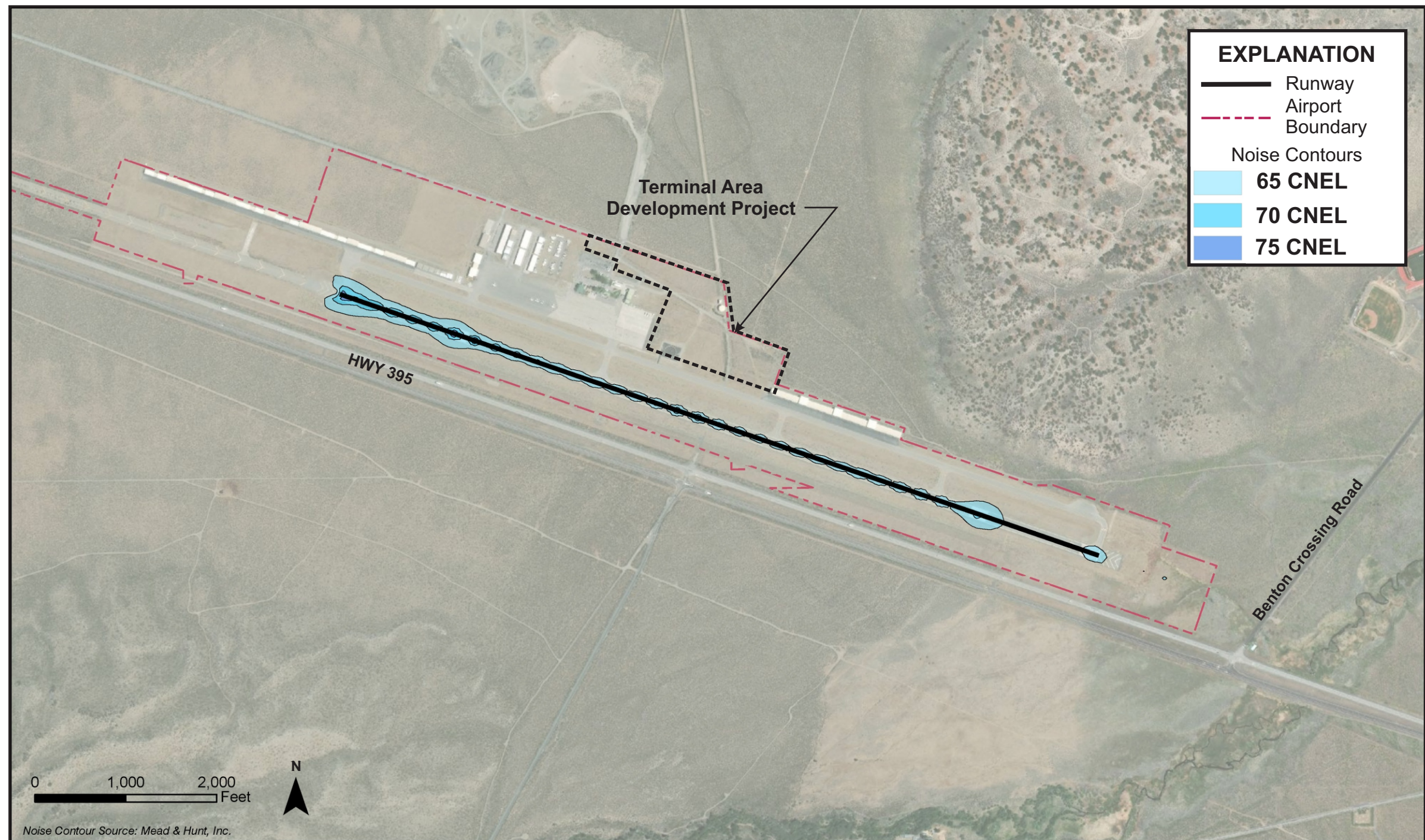
Neither of these types of land uses are sensitive to noise, and noise contours do not extend to the industrial park. There are no land uses on or near the study area that are sensitive to noise or are incompatible with existing Airport activities.

The closest permanent residences to the Airport are approximately 1.5 miles west of the study area. Located about 0.6 miles southwest of Runway 27, the Sierra Nevada Aquatic Research Laboratory (SNARL) provides temporary housing for up to 45-people in five buildings. All of the residences are beyond the Airport property and outside of the noise contours as shown in Exhibit 3-7. Land use in the areas surrounding the Airport is managed by the Inyo National Forest, BLM, LADWP, and Mono County Airport Land Use Commission. Current land uses are shown graphically in Exhibit 3-6.

3.3.10 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

The Airport and surrounding area are located in Mono County Census Tract 1.01⁶ (Exhibit 3-8) which represents all of southern Mono County except for the Town of Mammoth Lakes, but includes the communities of June Lake, Crowley Lake, Aspen Springs, Tom's Place and Swall Meadows. The affected environment area is designated Census Tract 1.01 which includes the Airport. Information for the Town of Mammoth Lakes and for Mono County is also provided for comparison purposes where it is deemed appropriate.

⁶<https://censusreporter.org/profiles/14000US06051000101-census-tract-101-mono-ca/>



Project Layout from:
*Mammoth Yosemite Airport Terminal Area
 Development Plan*, January 2015
 Image Source: GoogleEarth

Noise Model: AEDT Version 2d

Draft Environmental Assessment Terminal Area Development Project

**Existing Conditions
 Noise Contours 2018**

**Mammoth Yosemite Airport
 Town of Mammoth Lakes**

June 2021

EXHIBIT 3-7



Image Source: GoogleEarth

EXHIBIT 3-8

**Draft Environmental Assessment
Terminal Area Development Project
Mono County Census Tract 1.01**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**
June 2021

3.3.10.1 Socioeconomics

3.3.10.1.1 Population

Table 3-4 lists the population growth from 2013 to 2017 in the Census Tract in which the Airport is located. The Census Tract includes about 1,600 square miles with a total population (2017) estimated at 3,497. Data for the Town of Mammoth Lakes, Mono County, and the State of California are included for comparison purposes. Between 2013 and 2017, the population in

Census Tract 1.01 increased by an average of 9.01%, with most of the growth occurring in the Crowley Lake area. Comparatively, the populations in the Town of Mammoth Lakes and Mono County have both decreased. Population shifts have been attributed to increased housing costs in the Town of Mammoth Lakes and more affordable housing in rural areas and northern Inyo County. The overall population of the State of California has increased at a lesser rate than Census Tract 1.01.

Table 3-4 Population Change Between 2013 and 2017

Area	2013 Population	2017 Population	Percent Change
Census Tract 1.01 (MMH)	3,208	3,497	+9.01%
Town of Mammoth Lakes	8,180	8,092	-1.08%
Mono County	14,217	14,058	-1.12%
California	37,659,181	38,982,847	+1.04%

Source: U.S. Census Bureau. (2013). B01003 Total Population, 2009-2013 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder:

<https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>; U.S. Census Bureau. (2017). B01003 Total Population, 2013-2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder: <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

3.3.10.1.2 Housing

Table 3-5 (data from July 1, 2019) lists the total and vacant housing units in Census Tract 1.01, Town of Mammoth Lakes, Mono County, and the State of California for comparison. Averages of 51.49% of housing units are vacant in Census Tract 1.01, with even greater vacant unit percentages in the Town of Mammoth Lakes and Mono County.

Table 3-5 Housing Units
(July 1, 2019)

Area	Total Units	Vacant Units (percentage)
Census Tract 1.01	2,379	51.49%
Town of Mammoth Lakes	9,895	71.29%
Mono County	14,041	65.11%
California	13,996,299	7.92%

Note: The U.S. Census Bureau considers vacant housing units those for rent; rented but not occupied; for sale; sold but not occupied; for seasonal, recreational, or occasional use; for migrant workers; and other vacant units.

Source: U.S. Census Bureau. (2017). DP04 Selected Housing Characteristics, 2013-2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder: <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

3.3.10.1.3 Labor Force and Employment

Table 3-6 summarizes the employed population in Census Tract 1.01, the Town of Mammoth Lakes, Mono County, and the State of California. According to the U.S. Census Bureau, there are 1,465 employed civilians in Census Tract 1.01. Pre-COVID-19 pandemic unemployment rates were about five percent in Census Tract 1.01; no updated, 2020 or 2021, unemployment data are available. Comparatively, the unemployment rate in Mono County is about four percent. As Table 3-6 indicates, the largest employment sectors in Census Tract 1.01 are management, business, and financial occupations and personal care and service occupations. For the Town of Mammoth Lakes, the largest employment sectors are management, business, and financial occupations, food preparation and serving related occupations, and sales and related occupations.

Table 3-6 Overview of Employed Population

Subject	Census Tract 1.01	Town of Mammoth Lakes	Mono County	California
Civilian employed population 16 years and over	1,465	5,292	7,864	17,993,915
Management, business, and financial occupations	17.88%	19.94%	19.54%	15.54%
Computer, engineering, and science occupations	6.96%	4.06%	4.70%	6.52%
Education, legal, community service, arts, and media occupations	9.69%	3.97%	7.90%	11.05%
Healthcare practitioner and technical occupations	9.28%	4.65%	4.86%	4.98%
Healthcare support occupations	3.21%	0.00%	0.71%	1.89%
Protective service occupations	1.02%	0.85%	1.08%	2.05%
Food preparation and serving related occupations	6.21%	17.76%	13.48%	5.77%
Building and grounds cleaning and maintenance operations	5.67%	11.58%	9.03%	4.23%
Personal care and service occupations	14.74%	4.88%	6.03%	4.73%
Sales and related occupations	1.91%	11.98%	9.56%	10.63%
Office and administrative support occupations	9.90%	6.22%	8.47%	12.48%
Natural resources, construction, and maintenance occupations	7.39%	6.25%	7.32%	9.08%
Production, transportation, and material moving occupations	6.14%	7.86%	7.32%	11.05%

Source: U.S. Census Bureau. (2017). S2401 Occupation by Sex for the Civilian Employed Population 16 Years and Over, 2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder: <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

3.3.10.1.4 Surface Transportation

The main road in proximity to the project area is U.S. Highway 395, directly southwest of the Airport. Data from the California Department of Transportation indicate the average traffic volume on U.S. Highway 395 in the vicinity of the Airport ranges from 6,900 to 9,400 vehicles per day (Caltrans Census Program, Average Annual Daily Traffic, Mono County, 2019). Hot Creek Hatchery Road connects to U.S. Highway 395 and runs west and north of the Airport. Airport Road is directly north of the project area and intersects Hot Creek Hatchery Road, providing access to the Airport and Terminal Development Area. Data on traffic conditions on these roadways, such as Level of Service, are not available.

3.3.10.1.5 Environmental Justice

In accordance with Presidential Executive Order (EO) 12898, the Council on Environmental Quality issued guidance for each federal agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.”⁷ FAA Order 1050.1F, which is consistent with U.S. Department of Transportation

Order 56.10, establishes the requirements for assessing environmental justice impacts.

Table 3-7 illustrates the share of the population in poverty within Census Tract 1.01, the Town of Mammoth, Mono County, and the State of California. About 12.1% of the population in Census Tract 1.01 is below the poverty level. This is above the average of Mono County. The median household income in Census Tract 1.01, at \$62,536, is higher than the Town of Mammoth Lakes and Mono County; the State of California has a higher average median household income of \$67,169.

Based on proximity to the Airport and to the study area, no statistical minority populations, or population living below the poverty level have been identified. Within Census Tract 1.01, the closest residential populations, west of the Airport along Hot Creek (1.4 miles northwest of the study area), have not been identified by economic status or ethnicity.

Table 3-7 Population Below the Poverty Line

Area	Population for Whom Poverty Status is Determined	Percent of Population Living Below the Poverty Line
Census Tract 1.01	3,476	12.1%
Town of Mammoth Lakes	8,083	7.6%
Mono County	13,943	9.9%
California	38,242,946	15.1%

Source: U.S. Census Bureau (2017). S1701 Poverty Status in the Past 12 Months, 2013-2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder.

Table 3-8 shows the total minority presence in Census Tract 1.01, the Town of Mammoth Lakes, Mono County and the State of California. According to the U.S. Census Bureau, about 12.12% of the population in Census Tract 1.01 are minorities, which is less than that of Mono County.

Table 3-8 Minority Population

Area	Total Population	Percent Minority
Census Tract 1.01	3,497	12.12%
Town of Mammoth Lakes	8,092	14.90%
Mono County	14,058	14.73%
California	38,982,847	39.44%

Source: U.S. Census Bureau (2017). B02001: Race 2013-2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder.

⁷ CEQ. (1997, December 10). *Environmental Justice – Guidance Under the National Environmental Policy Act*. Retrieved October 2019, from Agency Guidance Related to Environmental Justice and NEPA: https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf

It should be noted that there are only scattered residences in the vicinity of the Airport; most of the surrounding area is open space with development limited to the Airport and an industrial park to the west. There are no populations concentrated in the Airport vicinity, including those of lower-income and/or minority populations.

3.3.10.1.6 Children's Environmental Health and Safety Risks

EO 13045, *Protection of Children from Environmental Health and Safety Risks* (62 FR 19885) is the primary EO related to Children's Environmental Health and Safety Risks. The order directs federal agencies to identify and assess environmental health risks and safety risks that may disproportionately affect children. For the purpose of this EA, children are considered to be persons less than 18 years of age.

Table 3-8 shows the percentage of children in Census Tract 1.01, the Town of Mammoth, Mono County, and the State of California. About 20.88% of the population in Census Tract 1.01 is under the age of 18, which is slightly higher than the percentage of children in Mono County. However, as previously noted, there are no concentrations of population in the vicinity of the Airport, including those of children. Based on proximity to the Airport and to the study area, no children (statistical populations) have been identified within Census Tract 1.01. The closest residential populations, west of the Airport along Hot Creek (1.4 miles northwest of the study area), have not been identified by age distribution.

Areas of particular concern for children's environmental health and safety risks are schools and recreational facilities. The closest school to the airport is the Mammoth Lakes Elementary School, approximately five miles west of the Airport. The seasonal Whitmore Recreation Area and Ball Fields are located one-mile northeast of the study area and is the closest recreational facility in proximity to the Airport. Neither facility is located within the affected environment identified for this issue.

Table 3-9 Percent of Children (Under 18 Years of Age)

Area	Total Population	Percent of Population Under 18 Years of Age
Census Tract 1.01	3,497	20.88%
Town of Mammoth Lakes	8,092	19.90%
Mono County	14,058	19.48%
California	38,982,847	23.38%

Source: U.S. Census Bureau. (2017), B09001 Population Under 18 Years by Age 2013-2017 American Community Survey 5-Year Estimates. Retrieved October 2019, from American Fact Finder: <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

3.3.11 Visual Effects

MMH is located along the north side of U.S. Highway 395, a State and County designated scenic highway (Caltrans designated November 9, 1971; official designation number 28; length 8.9-miles; Mono County designated from the junction with State Route 120 to the Inyo County Line, 51.0-miles). Scenic highway designations include the visible area outside the highway's right of way, generally described as "the view from the road" (2019 Regional Transportation Plan, amended December 9, 2019); elements of the Airport are visible from the highway.

Buildings and aircraft hangars can be seen from several locations within the vicinity of the airport. The most common view is looking north from U.S. Highway 395, as shown in Exhibit 3-9. Airport hangars are about 925-feet from the centerline of the westbound lanes; the existing terminal building is about 1,200-feet from the same centerline. Aircraft hangars are the most prominent manmade visual feature; runways and taxiways are not visible. Landing, departing and taxiing aircraft can be seen from the highway.

Current Airport facilities are illuminated for safety and security by various types of landside lighting for buildings, access roadways, apron areas, and automobile parking areas, and airside lighting for runways, taxiways, and apron areas. The closest light-sensitive land uses are the SNARL residences located about 1.0-miles southeast of the project area and a few residences, located approximately 1.4 miles north west of the study area along Hot Creek (see Section 3.2.7, Land Use).

3.3.12 Water Resources: Groundwater

Mammoth Yosemite Airport: Groundwater Technical Memorandum, prepared by Geolmagery in December 2019 and available in Appendix F, describes groundwater conditions at Mammoth Yosemite Airport. The Airport is located in the southwestern portion of the Long Valley Caldera and is within the Long Valley Groundwater Basin. Although probably isolated from the primary Long Valley Groundwater Basin by a series of volcanic flows, the Airport is underlain by a thin deposit of morainal outwash from the Convict Creek Moraine, and by a series of lacustrine and stream deposits to depths of about 140 feet below the existing ground surface.

Based on lithologic well log data from wells within about 1.5 miles of the Airport, there is a 150-foot-thick clay deposit which acts as a confining layer at a depth of about 140 feet beneath the Airport.

The depth to unconfined shallow groundwater varies between approximately 28 and 46 feet below ground surface. Groundwater gradient maps indicate that shallow groundwater flows are generally west to east and that buried volcanic flows west of the airport create a barrier to westerly groundwater flows towards Hot Creek. Geologic and groundwater maps are presented in the groundwater technical memorandum in Appendix F. The aquifer underlying the Airport is not included in a U.S EPA's sole source drinking water study area (www.epa.gov/dwssa/map-sole-source-aquifer-locations).

As noted in Section 3.2.8, Natural Resources and Energy Supply, two groundwater wells are located east of the study area. Both wells provide potable and firefighting water to the Airport; each well is 143 feet deep and has the capacity to pump up to 500 gallons of water per minute.



Note: Photograph (September 2019) taken near the shoulder of south bound U.S. Highway 395 looking north. Existing temporary terminal is on far left; water supply tank is on far right.

**Draft Environmental Assessment
Terminal Area Development Project
Existing Conditions View Looking North Towards
Proposed Terminal Location from U.S. HWY 395**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

EXHIBIT 3-9

3.3.13 Projects with the Potential to Contribute to Cumulative Impacts

This section identifies past, present, or reasonably foreseeable projects on or near the Mammoth Yosemite Airport that could contribute to cumulative environmental impacts when considered in combination with the TADP. Projects are generally confined to the Airport property, as the study area is within the Airport and the TADP affects Airport activities. However, projects outside the Airport boundaries that could directly affect Airport operations are also included (Exhibit 3-10).

3.2.13.1 Present Projects

- Bishop Airport (BIH) proposed commercial service (2022); (Exhibit 3-10)

3.2.13.2 Past Projects

- Segmented Circle Relocation (2019)
- Reconstruction of General Aviation apron (2018)

3.2.13.3 Reasonably Foreseeable Projects

- Perimeter Wildlife Exclusion Security Fence (2023)
- Land Acquisition (2024)
- Runway and Taxiway Shoulder Improvements (2023)



**Draft Environmental Assessment
Terminal Area Development Project
Bishop Airport Location**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

EXHIBIT 3-10

CHAPTER 4.0: ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

This chapter evaluates the potential environmental impacts associated with implementation of the Proposed Action compared to the No Action Alternative. The focus of this analysis is on resources that could be directly or indirectly affected and whether the impact would be considered significant utilizing criteria and procedures established in FAA Orders 1050.1F and 5050.4B. Potential environmental consequences are evaluated for the No Action Alternative and the Proposed Action.

- The No Action Alternative involves operating the Airport in its current condition, with no new construction or other improvements.
- The Proposed Action involves the construction and operation of a Terminal Area Development Project as described in Chapter 1.0 Section 1.3.

As outlined FAA Order 5050.4B, in paragraph 706.f concise analysis is undertaken only for the no action, proposed action, and each reasonable alternative. Some resources, listed below, will not be impacted by implementing the Proposed Action or the No Action Alternative and therefore are not discussed in detail. As described in Chapter 3, Section 3.1, the following resources are not impacted by the Proposed Action or No Action Alternatives:

- Coastal Resources
- Farmlands
- Wetlands (Waters of the U.S.)
- Floodplains
- Surface Waters
- Wild and Scenic Rivers

The environmental consequences analysis involves the following potentially affected environmental resources as set forth in Chapter 3. The impacts of construction and operation of the Proposed Action and the No-Action Alternative may differ for each environmental resource. For that reason, areas of consideration vary in accordance with descriptions in Chapter 3, Section 3.2:

- Air Quality
- Biological Resources
- Climate
- DOT Section 4(f) and Land and Water Conservation Fund Action Section 6(f)
- Hazardous Materials, Solid Waste, Pollution Prevention
- Historical, Architectural, Archaeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply

- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources: Groundwater
- Cumulative Effects

4.2 Potentially Affected Resource Categories

4.2.1 Air Quality

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance determinations for air quality, which states, "The action would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS), as established by the U.S. Environmental Protection Agency (USEPA) under the Clean Air Act (CAA), for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations."

Section 176(c) of the CAA and associated regulations requires the conformity of general Federal actions to the applicable State Implementation Plan. A Federal agency must make a conformity determination that a Federal action conforms to the applicable implementation plan where the total of direct and indirect emissions in a nonattainment or maintenance area caused by a Federal action would equal or exceed specified rates. For the Mammoth Lakes area, which is designated a maintenance area for PM₁₀, the following emission factors apply as the EPA's General Conformity *De Minimis* thresholds:

Ozone (NO_x, SO₂, or NO₂): 100 tons per year

Ozone (VOC), within ozone transport region: 50 tons per year

CO and PM₁₀: 100 tons per year

Lead: 25 tons per year

Project emissions from the Proposed Action, both construction and operational, were estimated using the California Emissions Estimator Model (CalEEMod), a computer modeling program used for projects in most air districts in California. CalEEMod calculates its results based upon the land uses involved with a project. CalEEMod does not have emission factors specifically related to airport land use. Therefore, for the Proposed Action, it was assumed that approximately 16% of the square footage was represented by light industrial space and the remaining square footage by office park space.

4.2.1.1 No Action Alternative

Under the No Action Alternative, no construction would occur, so no construction emissions would be generated. Operational emissions, as noted in Section 3.2.1.1, are typically generated by aircraft, aircraft support equipment, and surface vehicles. These sources are not controlled by an airport.

4.2.1.2 Proposed Action

The results of the CalEEMod run are summarized in Table 4-1. In accordance with FAA Order 1050.1F Desk Reference Section 1.3.5, the net emissions (Proposed Action emissions minus No Action emissions) are compared to the general conformity *de minimis* thresholds. As indicated in Table 4-1, net emissions would not exceed the general conformity *de minimis* thresholds applicable to the Mammoth Lakes area. As such, the Proposed Action would conform to the State Implementation Plan, would not exceed any of the NAAQS, and the General Conformity requirements have been met.

Table 4-1
General Conformity *De Minimis* Thresholds and Air
Pollutant Emissions

	VOC ¹	NO _x	CO	SO _x	PM ₁₀	Lead
Conformity Thresholds (tons per year)	50	100	100	100	100	25
Proposed Action Emissions	0.34	0.77	1.45	<0.01	0.36	0.00
No Action Emissions	0.04	0.11	0.20	<0.01	0.05	0.00
Net Emissions	0.30	0.66	1.25	<0.01	0.31	0.00
Above Threshold?	No	No	No	No	No	No

Notes: VOC – volatile organic compounds; NO_x – nitrogen oxide; CO – carbon monoxide; SO_x – sulfur oxide; PM₁₀ – particulate matter 10 microns in diameter; PM_{2.5} – particulate matter 2.5 microns in diameter.

¹ In CalEEMod, emissions are calculated for reactive organic gases (ROG), which are equivalent to VOC. Both are ingredients of ozone, along with NO_x. Sources: CalEEMod Version 2016.3.2, Great Basin Unified Air Pollution Control District.

Site preparation and construction activities such as clearing, grading, digging, trenching, roadwork, and temporary soil stockpiling would generate fugitive dust emissions (particulate matter). Exhaust from construction equipment and construction vehicles accessing the site would also contain criteria pollutant emissions. Short-term emissions would last only during construction activities and Best Management Practices (BMPs) will be utilized to minimize any temporary effects.

4.2.1.3 Avoidance and Conservation Measures

BMPs would be utilized to minimize, to the extent practicable, emission of criteria pollutants. The Town will require construction activities to occur in accordance with FAA AC 150/5370-10G, *Standards for Specifying Construction of Airports*, including BMPs such as: reducing equipment idling time; and use of dust control measures during construction activities.

4.2.2 Biological Resources

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance determinations for biological resources. A significant impact to biological resources would occur when the U.S. Fish and Wildlife Service or the National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a federally-listed threatened or endangered species, or would result in the destruction or adverse modification of federally designated critical habitat.

In addition to the determination above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider in evaluating the context and intensity of potential environmental impacts for biological resources:

- A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large project area (e.g., a new commercial service airport);
- Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats;
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or
- Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance.

4.2.2.2 No Action Alternative

Under the No Action Alternative, no construction activities would occur; therefore, no construction related ground-disturbing activities would alter existing habitats. Airport operations would continue under current conditions. The Airport would need to maintain its facilities to Part 139 standards, which includes keeping ground cover vegetation at height of 6 to 12 inches. This would limit the extent to which the existing sagebrush habitat may expand. As noted in Chapter 3, Section 3.2.2, no federally listed species have the potential to occur on the site due to the lack of suitable habitat.

4.2.2.3 Proposed Action

As noted in Chapter 3, Section 3.2.2, the analysis of the Proposed Action in the Biological Resource Assessment (Appendix B) did not identify any potential effects on federally-listed threatened or endangered species or designated critical habitat within the study area or Airport property. The FAA considered the information in the Biological Resources Assessment and determined that the Proposed Action would have *no effect* on federally-listed species or designated critical habitat. Migratory birds protected by the Migratory Bird Treaty Act are unlikely to be attracted to the project area as suitable habitat is limited. The Biological Resources Assessment concluded that the study area does not provide suitable nesting habitat for any common raptors known from the region, nor for other birds protected by the Migratory Bird Treaty Act.

4.2.2.4 Avoidance and Conservation Measures

No avoidance or conservation measures are required or proposed.

4.2.3 Climate

The FAA has not identified significance thresholds for aviation GHG emissions, nor has the FAA identified specific factors to consider in making a significance determination for GHG emissions (1050.1F Desk Reference, paragraph 3.3.4). There are currently no accepted methods of determining significance applicable to aviation projects given the small percentage of emissions they contribute. CEQ has noted that "it is not currently useful for the NEPA analysis to attempt to

link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and to understand.”¹ Accordingly, it is not useful to attempt to determine the significance of such impacts. There is a considerable amount of ongoing scientific research to improve understanding of global climate change and FAA guidance will evolve as the science matures or if new Federal requirements are established. Notwithstanding, GHG emission estimates for construction and operation of the Proposed Action and the No Action Alternative are disclosed for general information purposes.

4.2.3.2 No Action Alternative

Under the No Action Alternative, the terminal facilities would remain unchanged and aviation forecasts would occur as described in Chapter 1, Section 1.2.2. Table 4-2 below provides an estimate of GHG operational condition emissions under this alternative, which is approximately 128.0 metric tons (MT) Carbon Dioxide equivalent (CO₂e) annually. However, as discussed in Section 3.2.3, the Airport does not control these GHG sources, which are operated by corporate entities and private individuals.

4.2.3.3 Proposed Action

The CalEEMod model as described in section 4.2.1 was used to estimate the total GHG operational emissions of the Proposed Action to be 377.7 MT CO₂e annually, while short-term construction emissions are estimated to be 299.1 MT CO₂e. Table 4-2 presents the results of the CalEEMod GHG emissions estimates. .

Table 4-2 GHG Emissions

GHG Emissions Conditions	Annual Emissions (MT CO ₂ e)	Short-Term Construction (MT CO ₂ e)
No Action Alternative: Operational	128.0	NA
No Action Alternative: Construction	NA	0
Proposed Action: Operational	377.7*	NA
Proposed Action: Construction	NA	299.1

Source: California Emissions Estimator Model v. 2016.3.1, CAPCOA.

*Based on maximum TADP buildout

4.2.3.4 Avoidance and Conservation Measures

No avoidance or conservation measures are required.

¹ CEQ (2010). Draft Guidance, Consideration of the Effects of Climate Change and Greenhouse Gas Emissions, 75 Federal Register 8046 (February 23, 2010).

4.2.4 Department of Transportation Act, Section 4(f)

FAA 1050.1F Desk Reference identifies the procedural requirements for complying with Section 4(f) as set forth in DOT Order 5610.1D. This DOT Order, *Procedures for Considering Environmental Impacts* provides the DOT's procedures for the National Environmental Policy Act (NEPA). The FAA also uses Federal Highway Administration/Federal Transit Administration regulations in 23 CFR part 774 (73 *Federal Register* 31609 [June 3, 2008]) and FHWA guidance (e.g., Section 4(f) Policy Paper, 77 *Federal Register* 42802 [July 20, 2012]). These requirements are not binding on the FAA; however, the FAA may use them as guidance to the extent relevant to aviation projects. Ultimately, the FAA evaluates the potential for a proposed DOT action to impact a Section 4(f) property. As described in Chapter 3, Section 3.2.4., DOT 4(f) properties can include publicly owned parks, recreational areas, or wildlife and waterfowl refuges such as National Forests.

Section 4(f) refers to the original section within the U.S. Department of Transportation Act of 1966 which provided for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to the U.S. Department of Transportation (U.S. DOT) and is implemented through the regulation 23 CFR 774.

A significant impact would occur if the proposed action involves more than a minimal physical use of a Section 4(f) resource or constitutes a “constructive use” based on an FAA determination that the aviation project would substantially impair the Section 4(f) resource. FAA 1050.1F Desk Reference, Section 5.3.7., further indicates that “a significant impact under NEPA would not occur if mitigation measures eliminate or reduce the effects of the use below the threshold of significance. If a project would physically use Section 4(f) property, the FAA is responsible for complying with Section 4(f) even if the impacts are less than significant for NEPA purposes.”

As described in Chapter 3, Section 3.2.4, in 1984 Mono County executed a permanent easement with the Forest Service (U.S. Department of Agriculture) for a road/highway right-of-way for what is now Airport Road. The purpose of the easement on Section 4(f)¹ property is for public access to a public-use airport.

The FAA determined, that the paved extension of Airport Road within the existing easement which had been reserved for transportation infrastructure would not be subject to DOT Section 4(f) in accordance with 23 CFR § 774.11(h), because the property was *formally* reserved for a future transportation facility, even though it temporarily functioned as a park, recreation, or wildlife and waterfowl refuge in the interim.

On November 3, 2020, the FAA sought the concurrence of the U. S. Department of Agriculture (USDA), Forest Service (FS), as the official with jurisdiction, with its assessment that DOT Section 4(f) would not apply to the proposed extension of Airport Road. The FAA evaluation considered the existing transportation easement and the mixed land use of the subject area within Inyo National Forest.

On December 15, 2020 the USDA-FS, responded with its concurrence that DOT Section 4(f) does not apply to the proposed extension of Airport Road within the existing easement located on National Forest System lands. On February 18, 2021, Mono County submitted an acknowledgement to the FAA of its intent to participate in the coordination of proposed Airport Road extension with the Town of Mammoth Lakes and USDA-FS. (Copies of the consultation are located in this EA Appendix G).

4.2.4.3 No Action Alternative

Under the No Action Alternative, Airport Road would not be extended within the existing easement over land managed by the Inyo National Forest. The easement would remain dedicated to a transportation use, but would not be developed. No DOT Section 4(f) impact would occur under the No Action Alternative.

4.2.4.2 Proposed Action

The Proposed Action includes extension of Airport Road within the USDA-FS easement to Mono County approved in 1984. As discussed in Section 4.2.4, USDA-FS concurred with the FAA assessment that DOT Section 4(f) protections do not apply to the proposed road extension within an existing transportation easement. No impact to DOT Section 4(f) resources would occur with implementation of the Proposed Action.

4.2.4.3 Avoidance and Conservation Measures

No Section DOT 4(f) avoidance or conservation measures are recommended.

4.2.5 Hazardous Materials, Solid Waste, and Pollution Prevention

Hazardous materials, solid waste, and pollution prevention includes the evaluation of potential waste streams; potential hazardous material use; potential to encounter sites contaminated with hazardous waste; and the potential to interfere with ongoing remediation of a previously contaminated site. This EA analyzes the potential change in hazardous materials and waste storage and consumption between the No Action and Proposed Action alternatives. The FAA has not established a significance threshold for hazardous materials, solid waste, and pollution prevention. However, it does provide a number of factors to consider in evaluating the context and intensity of potential environmental impacts. These include when the Proposed Action or No Action Alternative would have the potential to:

- Violate applicable federal, state, or local laws or regulations regarding hazardous materials and/or solid waste management;
- Involve a contaminated site (including but not limited to a site listed on the National Priorities List);
- Produce an appreciably different quantity or type of hazardous waste;
- Generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity; or
- Adversely affect human health and the environment.

4.2.5.2 No Action Alternative

Under the No Action Alternative, the site would remain undeveloped and no hazardous materials would be transported or stored on the site. The FBO would remain the only listed RCRA site near the study area. The quantity of fuel used would increase slightly under the No Action Alternative consistent with the forecast for general aviation operations discussed in Chapter 1, Section 1.2.2. Since commercial air carrier aircraft do not refuel at MMH, air carrier flights would not affect the quantity of fuel dispensed at MMH. Existing above ground fuel storage tanks are surrounded by a secondary containment system that reduces the possibility of any fuel spills going beyond Airport property.

Under the No Action Alternative, the PFAS containing AFFF would remain securely stored in the aircraft hangar that houses the ARFF equipment. Use of AFFF would remain consistent with the MMH Airport Certification Manual.

Under the No Action Alternative, de-icing operations would continue to occur in accordance with the industrial stormwater permit issued for these operations. The FBO would continue to store and utilize the fluids, as required for the aviation operations occurring at MMH.

Solid waste generated by the Airport would continue to be collected. After the closure of the Benton Road Landfill on January 1, 2023, solid waste will be collected by Mammoth Disposal Company and processed at its expanded transfer station located in the Town of Mammoth Lakes.

4.2.5.3 Proposed Action

The Proposed Action would involve the storage, transport, use, and disposal of hazardous materials. In particular, the proposed maintenance facility as described in Chapter 1.0, Section 1.3, would store materials that may be considered hazardous to human health, such as AFFF, petroleum products, de-icing liquids, and solvents. FBO and Airport personnel would continue use of these substances consistent with operational needs. While the new terminal would have activities that do not require large amounts of hazardous materials, the building would require increased use of propane for heating purposes, which in turn would require larger onsite storage tanks. In addition, use of de-icing fluid would be extended at the proposed de-icing apron.

Activities that transport or store hazardous materials would be required to do so in compliance with applicable local, state, and federal regulations. In addition, MMH has a Spill Prevention, Control, and Countermeasures (SPCC) Plan that addresses spill prevention and response requirements, and a Hazardous Materials Business Plan (HMBP) that outlines emergency response procedures for hazardous material releases. The SPCC and HMBP would be updated to account for additional storage of hazardous materials such as propane.

De-icing fluid used on the proposed de-icing apron would drain to a central inlet and holding tank. A valve-controlled dual-pipe discharge would send the collected de-icing fluid to a holding tank for storage until it is removed and transported to the licensed disposal facility at the Buttonwillow Landfill approximately 290- miles southwest of the Airport in Kern County. De-icing operations are

required to obtain an industrial stormwater permit from the State Water Resources Control Board. This permit is designed to implement federally required stormwater regulations and would be issued as a General Stormwater Permit prior to final design and operation of the de-icing apron. Compliance with the industrial stormwater permit and its conditions would ensure that fluids from de-icing operations are properly collected and treated.

Minor changes in solid waste generation and disposal would occur when compared to the No Action Alternative. Because the landfill currently used for solid waste disposal is closing by January 1, 2023, solid waste would be hauled to the Mammoth Disposal Company's transfer station in the Town of Mammoth Lakes from where waste would be transferred to the Mono County landfill south of Lee Vining.

4.2.5.4 Avoidance and Conservation Measures

Since neither the Proposed Action nor the No Action Alternative would result in significant impacts on hazardous materials, solid waste, and pollution prevention, no avoidance or conservation measures are required or proposed.

4.2.6 Historical, Architectural, Archaeological, and Cultural Resources

The methodology for determining potential historic, architectural, archeological, and cultural resource impacts was to apply the guidance provided by the National Historic Preservation Act (NHPA), Section 106 (36 CFR Part 800). NHPA, § 800.16(l)(1) protects historic properties and properties eligible for listing on the National Register of Historic Places. The general steps in the process include: 1) establishing the APE; 2) identifying any resources in the area; and 3) determining whether the resources, if any, are included or eligible for inclusion on the National Register of Historic Places (NRHP) or are protected by other related statutes (e.g., the Native American Graves Protection and Repatriation Act (NAGPRA)).

The FAA Order 1050.1F, Exhibit 4-1, provides a factor to consider in evaluating the context and intensity of potential environmental impacts. This factor occurs when the proposed action would result in a finding of adverse effect through the process outlined in Section 106 of the NHPA. However, an adverse effect finding does not automatically trigger a significant impact determination. An undertaking has an effect on an historic property when the undertaking may alter the characteristics of the property that qualify the property for inclusion in the NRHP. For the purpose of determining effect, alteration to features of the property's location, setting, or use may be relevant depending on a property's significant characteristics and should be considered.

A cultural resources inventory was conducted in compliance with Section 106 of the NHPA. The assessment included literature review by the Eastern Information Center of the California Historical Resources Information System, a Sacred Lands File search by the NAHC, and an intensive pedestrian-level survey of the APE.

As detailed in Chapter 3, Section 3.2.6, the FAA established an APE, evaluated the cultural resource inventory, completed consultation with eight Native American Tribes, and determined

that there are no historic properties listed or eligible for listing on the NRHP within the APE. The FAA submitted its determination of eligibility and finding “*No Historic Properties Affected*” to the California SHPO for review. On February 11, 2020, the California SHPO concurred with the FAA’s APE, and findings. The SHPO concurrence letter in Appendix D.

4.2.6.2 No Action Alternative

Under the No Action Alternative, the continued operation and maintenance of MMH would not affect any historic, architectural, archaeological, or cultural resources. No construction activities would occur within the APE.

4.2.6.3 Proposed Action

As described in Section 3.2.6 and 4.2.6, the Proposed Action would have no impact on historic, architectural, archaeological, or cultural resources. The cultural resource inventory identified a very low potential for discovery previously unidentified archaeological deposits in the APE.

4.2.6.4 Avoidance and Conservation Measures

In the event previously unidentified resources are discovered during construction activities related to the Proposed Action, work in the immediate area will be halted and 36 CFR § 800.13 procedures will be implemented. A qualified archaeologist (36 CFR Part 61) will be notified, who will then evaluate the resource and consult with the Town, and the FAA.

If unanticipated human remains are discovered during Proposed Action construction, work shall stop at the discovery location and any nearby area the Mono County coroner shall be contacted to determine if the cause of death must be investigated. The FAA will be notified within 24 hours of the discovery.

If the coroner determines that the remains are of Native American origin, the NAHC will be contacted by the Town. The NAHC is to locate the most likely descendant to make recommendations regarding the treatment of the remains with appropriate dignity. If NAHC is unable to identify a descendant, or a descendant fails to make a recommendation, the remains shall be removed at the direction of the coroner and work may resume.

4.2.7 Land Use

The compatibility of existing and planned land uses with an aviation or aerospace proposal is typically associated with noise impacts, which are evaluated in this EA. In addition to the impacts of noise on land use compatibility, other potential actions may also affect land use compatibility such as the disruption of communities, relocation, induced socioeconomic impacts, and land uses protected under Section 4(f) of the USDOT Act.

The Town accepts federal Airport Improvement Program (AIP) grant funds to construct and maintain airport facilities. Therefore, as part of its grant assurances, the Town is obligated to comply with local land use plans and zoning laws. The Town’s Grant Assurance letter committing to consistency with local plans is located in Appendix H. Land uses and zoning designations for

the study area and the Airport were obtained for the land use analysis conducted in this section. The land use analysis considered existing and future land use plans within and adjacent to the study area.

The FAA has not established a significance threshold for land use. It is noted that the determination that significant impacts exist in the land use impact category is normally dependent on the significance of other impact categories.

4.7.2.1 No Action Alternative

Under the No Action Alternative, the project would not be implemented. Existing land use within the study area would be unchanged.

4.2.7.2 Proposed Action

Under the Proposed Action, some changes would occur to existing conditions on land in the study area through the construction and operation of the Proposed Action components identified in Chapter 1, Section 1.3. However, the proposed development would be consistent with the existing development on the Airport property and with the Town's General Plan designations and zoning. The Proposed Action would not affect any lands beyond the boundaries of the study area (Exhibit 3-2). The study area is owned by the Town; however, a small portion of the Airport along Highway 395 is owned by the U.S. Forest Service and is used by the Airport under a Special Use Permit. Likewise, the eastern end of the Airport is located on land leased from the Los Angeles Department of Water and Power (Exhibit 3-6). The Proposed Action would not conflict with the management of lands owned by the U.S. Forest Service or the LADWP.

4.7.2.3 Avoidance and Conservation Measures

Neither the Proposed Action nor the No Action Alternative would result in significant impacts on land use; no measures are required or proposed.

4.2.8 Natural Resources and Energy Supply

This EA evaluates project-related potential effects on natural resources and energy supplies in the study area. This is primarily done by examining how alternatives considered would influence natural resource consumption and the relative availability of resources such as:

- Water resources
- Electricity consumption
- Fuel consumption

Potentially significant effects could occur if the action would have the potential to cause demand to exceed available or future supplies of these resources, which include aviation and surface vehicle fuel, construction material, and electrical power. The FAA has not established a significance threshold for Natural Resources and Energy Supply.

4.2.8.1 No Action Alternative

Under the No Action Alternative, no new buildings or improvements would be constructed. No construction materials or energy to operate construction equipment would be consumed. There would be no anticipated increase in the use of electricity or propane gas that is associated with the Proposed Action. However, it is possible that this alternative would lead to less-efficient energy use, as the existing terminal structures and buildings that house the ARFF equipment and other activities would continue to be used. The existing terminal building and tensile structure were not constructed to be consistent with the requirements for energy use and conservation set forth in FAA Order 1053.1C, *Energy and Water Management Program for FAA Buildings and Facilities* (September 26, 2017).

4.2.8.2 Proposed Action

The Proposed Action would lead to an increase in the consumption of electricity and propane gas, as the terminal building would be larger than the existing terminal structures. An increase in energy consumption is also anticipated with the new maintenance facility. While Airport activities that would use this building would mostly relocate from an existing leased hangar, this would leave the vacated leased hangar available for aircraft storage.

The Proposed Action would be developed consistent with the requirements found in FAA Order 1053.1 *Energy and Water Management Program for FAA Buildings and Facilities*. The Order includes requirements for reductions in energy and water consumption and for greater use of clean energy sources such as, but not limited to, solar, wind and geothermal. It should be noted that the Proposed Action would also comply with State of California codes that would reduce electricity and water consumption.

The Proposed Action would involve the use of asphalt, concrete, aggregate for sub-base materials, and various metals for the proposed improvements. The construction materials would not be used in unusual quantities when compared to similar projects. All materials would be obtained from existing commercial sources.

4.2.8.3 Avoidance and Conservation Measures

Since neither the Proposed Action nor the No Action Alternative would result in significant impacts on natural resources or energy supplies, no measures are required or proposed.

4.2.9 Noise and Noise-Compatible Land Use

Methods to describe existing noise conditions and estimating the future noise environment rely extensively on the FAA's required model for noise analysis, the AEDT, Version 2d. Noise exposure is depicted as lines delineating noise levels, or noise contours. Four noise modeling results are described in Sections 4.2.9.1 and 4.2.9.2 and illustrated in Exhibit numbers 4-1 through 4-4 for the No Action and Proposed Action Alternatives for the years 2023 and 2028.

FAA Order 1050.1F, Chapter 4, Section 4-3, Exhibit 4-1, provides the FAA's significance determinations for noise and noise-compatible land use, which states, "The action would increase noise by CNEL 1.5 dB or more for a noise-sensitive area that is exposed to noise at or above the CNEL 65 dB noise exposure level, or that will be exposed at or above the CNEL 65 dB level due to a CNEL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe. For example, an increase from CNEL 65.5 dB to 67 dB is considered a significant impact, as is an increase from CNEL 63.5 dB to 65 dB".

4.2.9.1 No Action Alternative

Under the No Action Alternative, no construction work would occur, therefore, no noise impacts would be generated from construction activities. Existing conditions regarding noise related to Airport operations would remain as shown in Exhibit 4-1 for the year 2023. There are no noise-sensitive land uses at the Airport, and projected noise contours would not extend beyond Airport property.

Aviation forecasts, the estimated total number of aircraft operations, under the No Action Alternative for the year 2023 is 7,611 and for the future No Action Alternative (2028) is 7,755; an increase of about one percent. The noise model contours are shown in Exhibit 4-1 (2023) and Exhibit 4-2 (2028).

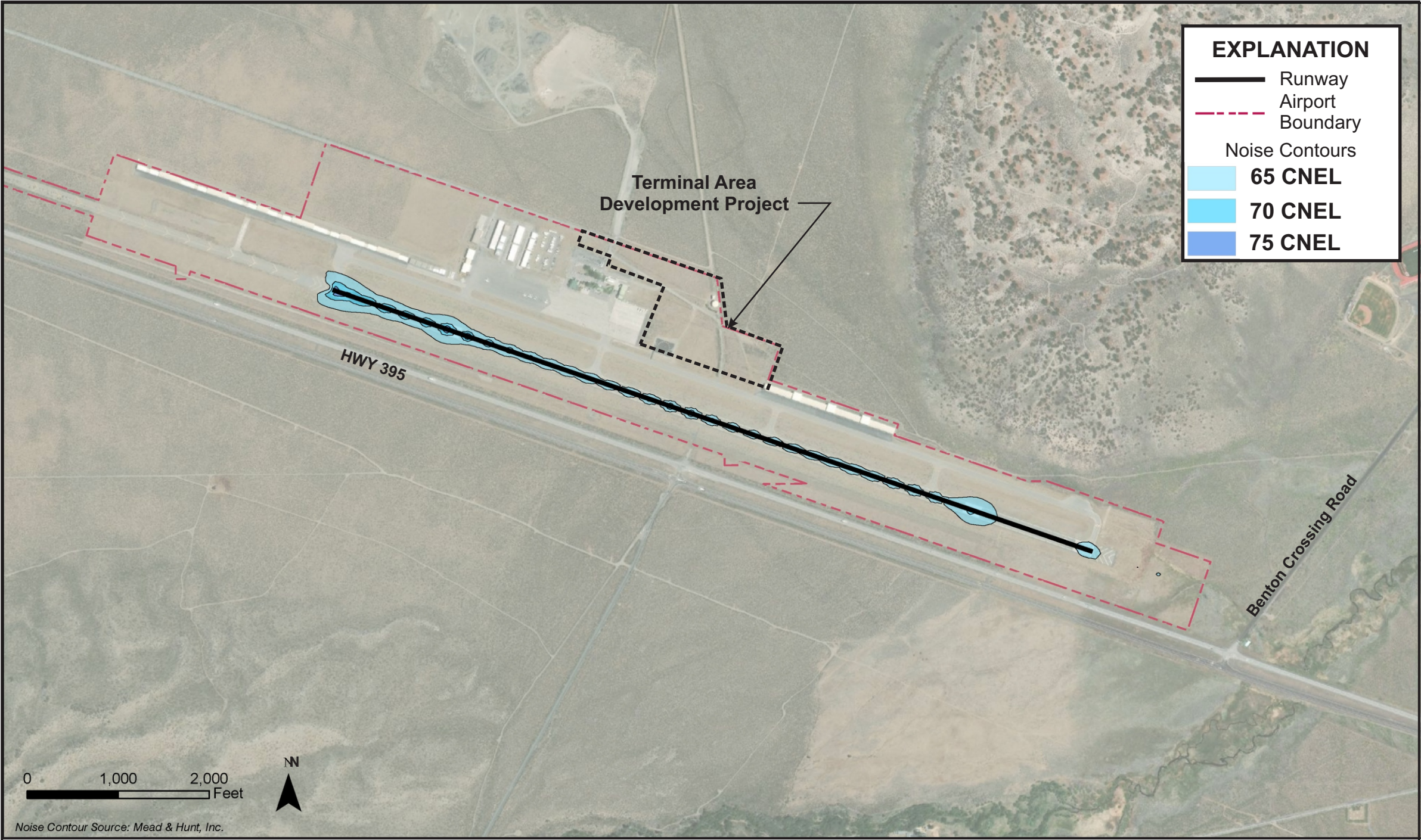
4.2.9.2 Proposed Action

Under the Proposed Action, noise would be generated by construction activities. Construction noise would be generally confined to the study area and immediate vicinity. Immediate land uses include Airport activities and open space. Neither of these land uses are sensitive to construction noise, which would cease once construction work is completed. As noted, the nearest residences to the Airport are approximately 1.0 miles to the southeast of the project area and 0.6-miles southwest of Runway 27 at the SNARL.

Operational noise associated with the Proposed Action would be identical to the No Action Alternative as no change in aviation operations would occur. Exhibit 4-3, depicts noise contours for the year 2023 and Exhibit 4-4 for the year 2028. The estimated total number of aircraft operations for the year 2028 is 7,755. The main source of operational noise would be from aircraft takeoffs and landings, over the Airport. The proposed terminal and maintenance facility would not contribute substantial levels of operational noise on their own, mainly from vehicle traffic to and from these buildings. As with construction noise, operational project noise would not affect noise-sensitive land uses.

4.2.9.2 Avoidance and Conservation Measures

Neither the Proposed Action nor the No Action Alternative would result in significant impacts on noise and noise-compatible land use; no measures are required or proposed.



Project Layout from:
*Mammoth Yosemite Airport Terminal Area
Development Plan*, January 2015
Image Source: GoogleEarth

Noise Model: AEDT Version 2d

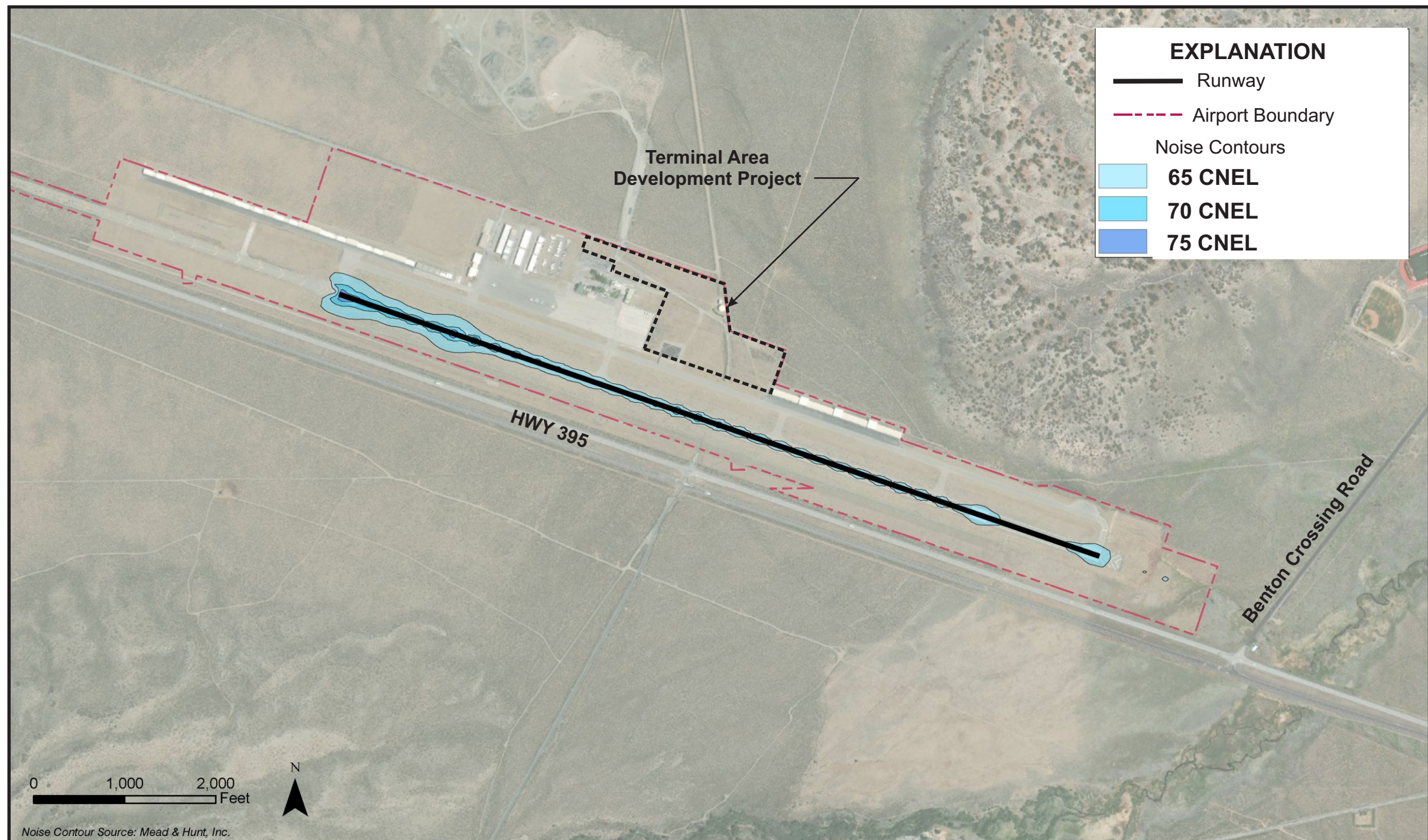
Draft Environmental Assessment Terminal Area Development Project

**No Action Alternative:
2023 Noise Contours**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

EXHIBIT 4-1



Project Layout from:
 Mammoth Yosemite Airport Terminal Area
 Development Plan, January 2015
 Image Source: GoogleEarth

Noise Model: AEDT Version 2d

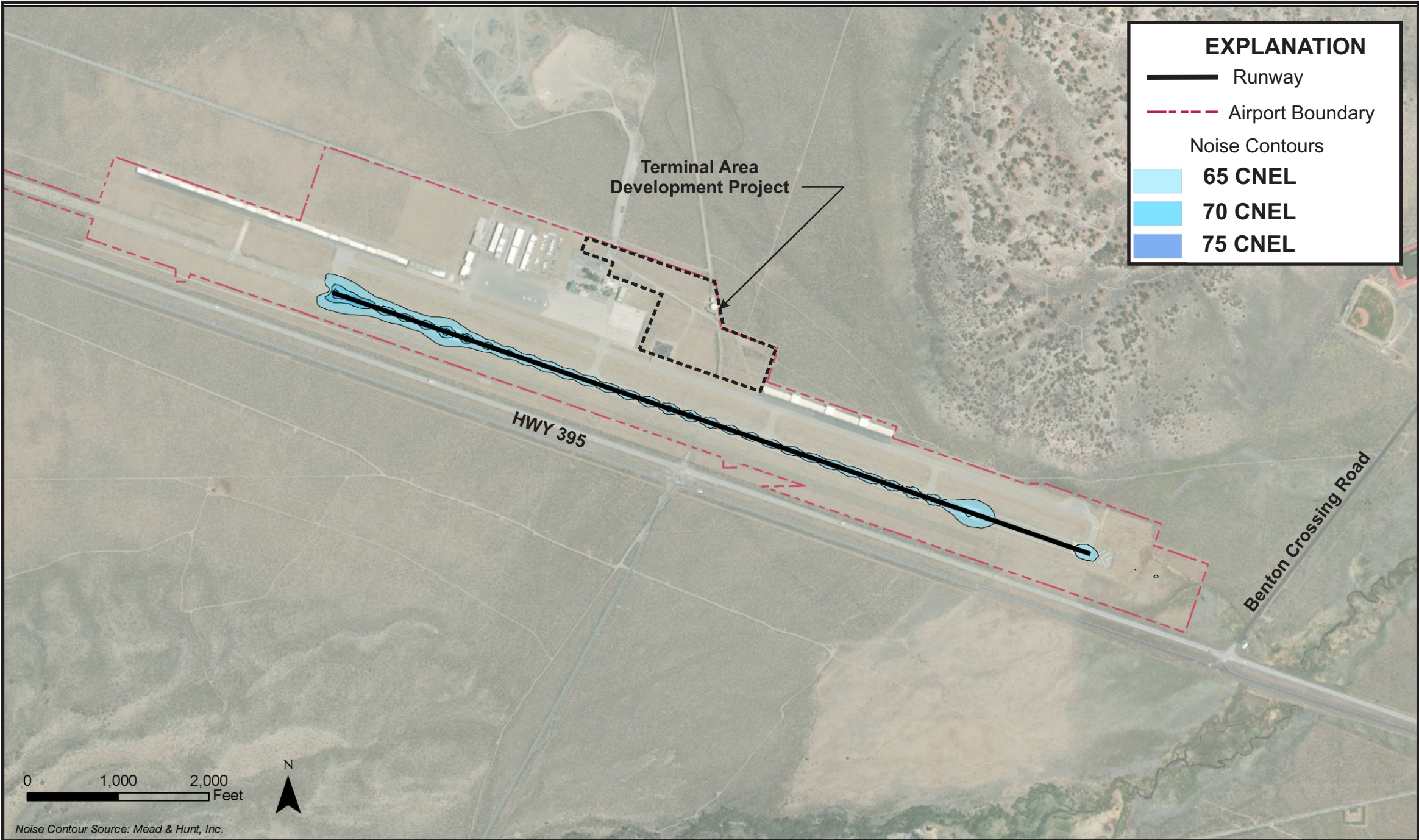
Draft Environmental Assessment Terminal Area Development Project

**No Action Alternative:
 2028 Noise Contours**

**Mammoth Yosemite Airport
 Town of Mammoth Lakes**

June 2021

EXHIBIT 4-2



Project Layout from:
Mammoth Yosemite Airport Terminal Area
Development Plan, January 2015
Image Source: GoogleEarth
Noise Model: AEDT Version 2d

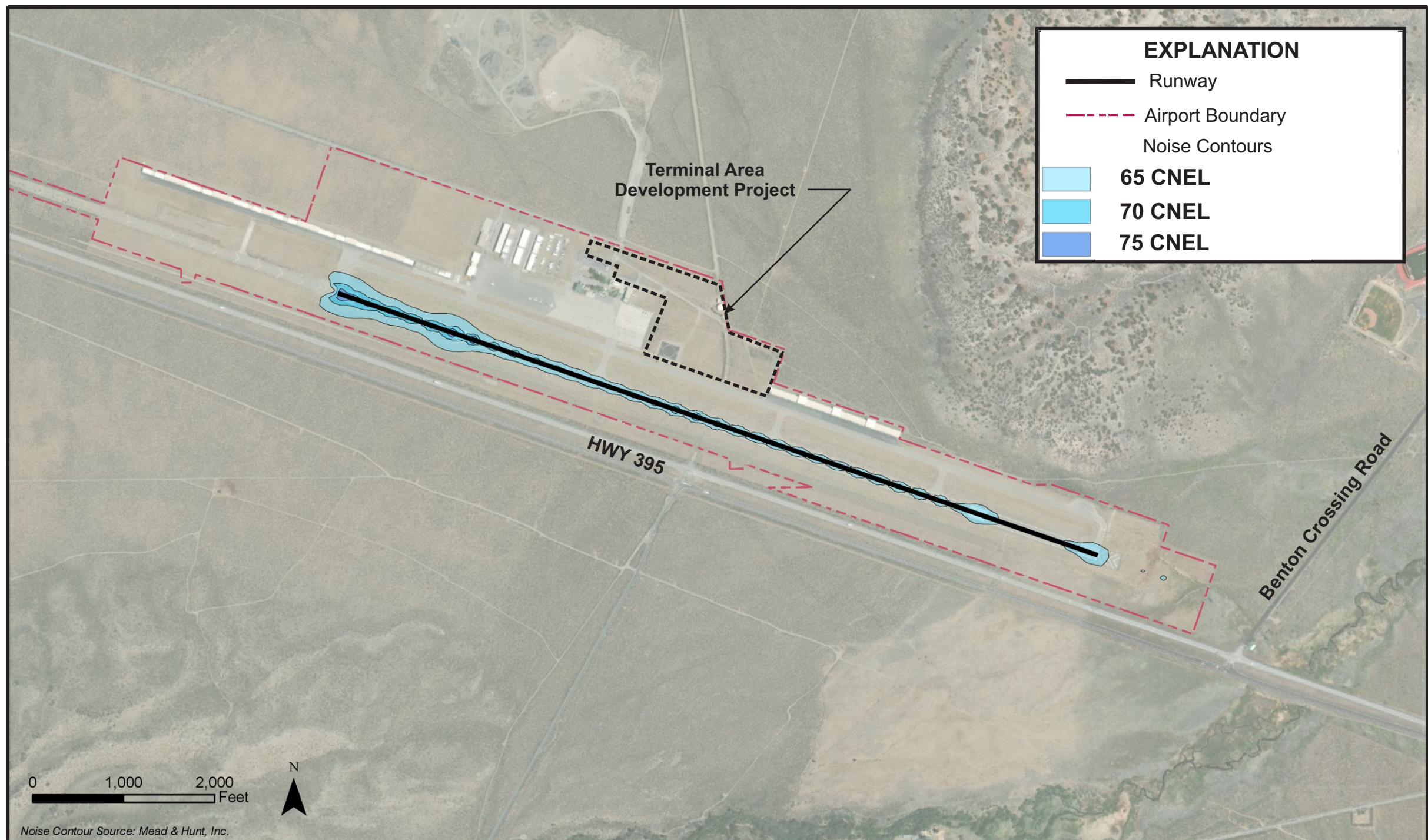
**Draft Environmental Assessment
Terminal Area Development Project**

**Proposed Action Alternative:
2023 Noise Contours**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

EXHIBIT 4-3

June 2021



Project Layout from:
*Mammoth Yosemite Airport Terminal Area
 Development Plan*, January 2015
 Image Source: GoogleEarth

Noise Model: AEDT Version 2d

Draft Environmental Assessment Terminal Area Development Project

Proposed Action Alternative: 2028 Noise Contours

**Mammoth Yosemite Airport
 Town of Mammoth Lakes**

June 2021

EXHIBIT 4-4

4.2.10 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

The FAA has not established significance determinations for socioeconomics, environmental justice, or children's environmental health and safety risks. However, the FAA Order 1050.1F, Exhibit 4-1, has identified several factors to consider in evaluating the context and intensity of potential socioeconomic impacts. Those factors to consider include the potential of the action to:

- Induce substantial economic growth in an area, either directly or indirectly (e.g., through establishing projects in an undeveloped area);
- Disrupt or divide the physical arrangement of an established community;
- Cause extensive relocation when sufficient replacement housing is unavailable;
- Cause extensive relocation of community businesses that would cause severe economic hardship for affected communities;
- Disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities; or
- Produce a substantial change in the community tax base.

The FAA also provides factors to consider in evaluating environmental justice impacts, including the potential of the action to have a disproportionately high and adverse impact to low-income or minority populations (environmental justice population), due to:

- Significant impacts in other environmental impact categories; or
- Impacts on the physical or natural environment that affect an environmental justice population in a way that the FAA determines are unique to the environmental justice population and significant to that population.

For children's environmental health and safety risks, the FAA recommends considering if the action would have the potential to lead to a disproportionate health or safety risk to children.

4.2.10.1 No Action Alternative

Under the No Action Alternative, no construction work would occur and aviation operations would continue at current conditions. Low-income and minority residents and businesses would be unaffected, as they would be under the Proposed Action. The risk to children's environmental health and safety would be unchanged from existing conditions, as there are no concentrations of children near the Airport. However, the potential opportunity to expand the Town's tax base through expanded concession space would not be available; otherwise, there would be no impact on the Town's tax base.

4.2.10.2 Proposed Action

The Airport is located approximately six miles east of the Town in an area that is mostly undeveloped except for the Sierra Business Park industrial tract located west of the Airport and south of U.S. Highway 395. The Proposed Action would be implemented on Airport property; the Sierra Business Park would not be affected. No residents would be relocated; there are no

residences on Airport property. There are no community businesses that would be affected by the Proposed Action. The Town would terminate its lease of a privately owned hangar for ARFF and snow removal equipment storage – all other businesses are Airport-related. The only other affected structures are the existing terminal building and temporary tensile structure. The Proposed Action would extend Airport Road and improve parking and passenger pickup/drop-off areas, which would improve traffic flow at the Airport. The expanded terminal would make available concession space, thereby potentially expanding the revenue generated from the Airport-based businesses.

As noted, the nearest residential area to the project area is approximately 1.0 miles to the southeast. The Proposed Action would not affect low-income or minority residents (environmental justice population), because there are no residences or schools on or near the Airport. For the same reason, the Proposed Action would not be a risk to children's environmental health and safety, especially since Proposed Action activities would be confined to the study area and there are no services specific to children present. The Proposed Action would result in no Socioeconomic, Environmental Justice, or Children's Environmental Health and Safety Risk impacts.

4.2.10.3 Avoidance and Conservation Measures

Since neither the Proposed Action nor the No Action Alternative would result in significant impacts to socioeconomics, environmental justice, or children's environmental health and safety risks, therefore no avoidance or conservation measures are required or proposed.

4.2.11 Visual Effects

There is no federal special purpose laws or requirements specific to light emissions or visual effects. However, FAA Order 1050.1F Desk Reference describes factors to consider within light emissions and visual resources/visual character. Potential impacts of light emissions include the annoyance or interference with normal activities and impacts to the visual character of the area due to light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources.

4.2.11.1 No Action Alternative

Under the No Action Alternative, the Airport's existing lighting and visual character as described in Chapter 3.0, Section 3.2.11 would remain. Views from public roads, including those from U.S. Highway 395, a designated scenic highway, would not change. There would be no increased lighting that would occur from Proposed Action improvements. The passenger terminal area would continue to be in a converted building and a temporary tensile structure; the ARFF equipment would continue to be located in an existing hangar. The overall visual landscape would not be affected.

4.2.11.2 Proposed Action

As noted in Chapter 3, Section 3.2.11, the most common view of the Airport is looking north from U.S. Highway 395 (Exhibit 3-9). Buildings and aircraft hangars can be seen from several

locations within the vicinity of the Airport. Airport hangars can be seen from the interchange of U.S Highway 395 and State Route 203, about six miles west of MMH. The proposed maintenance building would be designed to be similar in architectural character and physical appearance to the proposed terminal.

The proposed terminal building would be more distinctive in its appearance and therefore potentially more visible, particularly from U.S. Highway 395, a designated scenic highway. However, the visual character of the proposed terminal building is considered an improvement from the character of the existing terminal area, which consists of an older building and a temporary tensile structure as shown in a simulated image (Exhibit 4-5). Both the terminal building and the maintenance building are designed to not stand out vertically – the terminal building would be no greater than 35 feet in height. The terminal would use materials such as wood, stone, and stucco, and the exterior colors would be subdued in tone. As such, the new terminal building would not detract from the visual landscape.

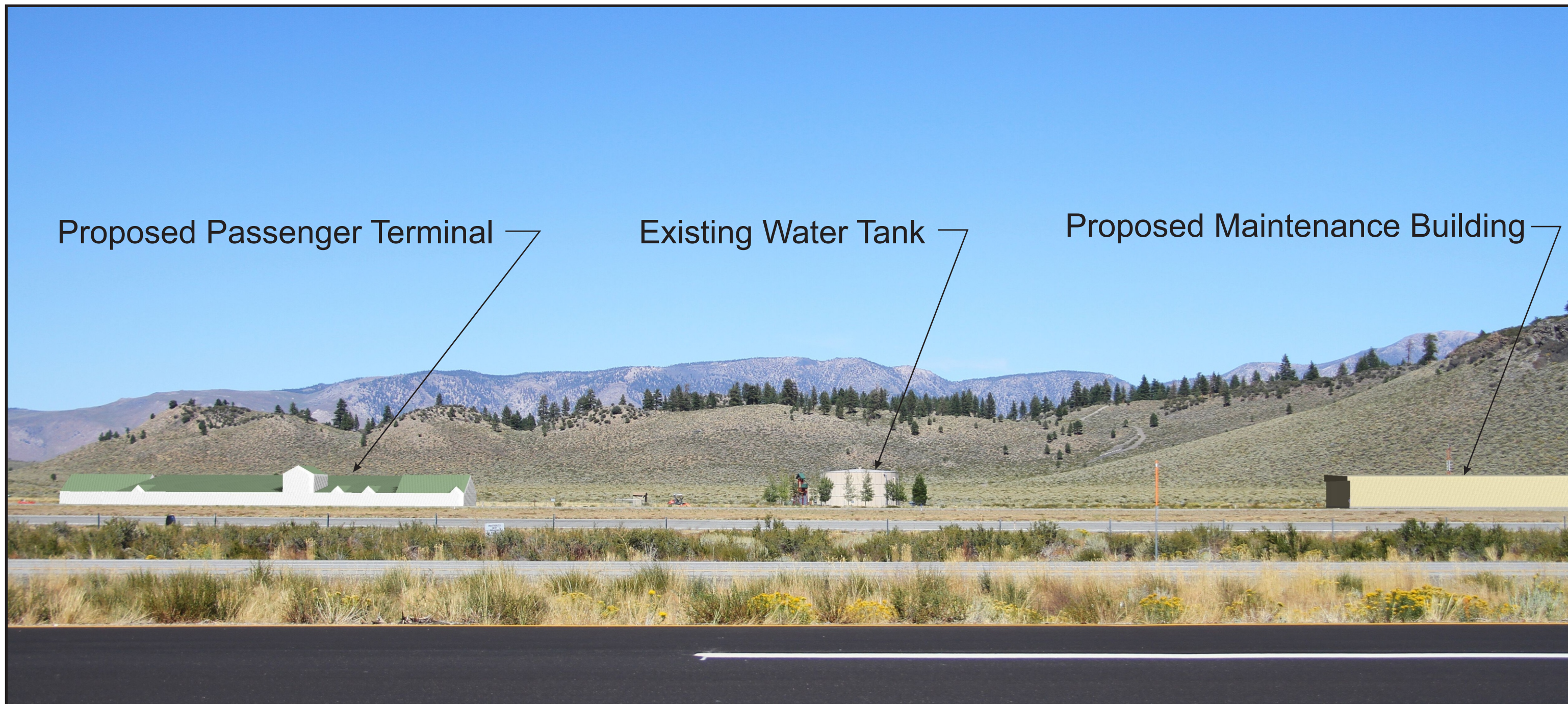
Current MMH facilities are illuminated with shielded lighting fixtures for safety and security by various types of landside lighting for buildings, access roadways, apron areas, and automobile parking areas; and by airside lighting for runways, taxiways, and apron areas. The Proposed Action would expand on the safety and security lighting through the construction of a new and larger terminal building and a new maintenance building, along with new parking areas associated with these buildings. Outdoor lighting that is not associated with aircraft operations will be designed to meet the requirements of Mammoth Lakes Municipal Code Section 17.36.030. This section requires all outdoor lighting fixtures to be designed, located, installed, aimed downward or toward structures, and maintained in order to prevent glare, light trespass, and light pollution. All new outdoor lighting shall use full cut-off luminaries with the light source downcast and fully shielded with no light emitted above a horizontal plane.

The closest light-sensitive land use is located approximately 1.0 miles southeast of the project area at the SNARL along Mount Morrison Road. At that distance, lighting from the Airport would not indirectly illuminate the residential area at a noticeable enough level to disturb sleep, the main concern with lighting.

The Proposed Action structures, visible from U.S. Highway 395 and from other vantage points, will be designed and constructed to reflect the character of the Eastern Sierra. The natural materials and color palette for all proposed structures will be chosen to reduce, as much as possible, any intrusive visual effects.

4.2.11.3 Avoidance and Conservation Measures

Since neither the Proposed Action nor the No Action Alternative would result in significant visual impacts, no avoidance or conservation measures are required or proposed.



Proposed Passenger Terminal

Existing Water Tank

Proposed Maintenance Building

Note: Photograph (September 2019) taken near the shoulder of south bound U.S. Highway 395 looking north. Simulated terminal is on far left; simulated maintenance building is on far right.

**Draft Environmental Assessment
Terminal Area Development Project
Simulated View to North from U.S. HWY 395**

**Mammoth Yosemite Airport
Town of Mammoth Lakes**

June 2021

Exhibit 4-5

4.2.12 Water Resources: Groundwater

The consequences of the Proposed Action and the No Action Alternative on groundwater within the study area are analyzed by characterizing any impervious surfaces, excavation, or construction of structures that would have the potential to affect groundwater. Different types of impacts to groundwater, including any direct or indirect impacts that result from construction and operation, are considered. The extent to which operation activities may affect groundwater, such as potential drawdown, are also considered.

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance determinations for groundwater. A significant impact exists if the action would:

- Exceed groundwater quality standards established by federal, state, local, and tribal regulatory agencies; or
- Contaminate an aquifer used for public water supply such that public health may be adversely affected.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider when evaluating the context and intensity of potential environmental impacts for groundwater. Factors to consider that may be applicable to groundwater include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to:

- Adversely affect natural and beneficial groundwater values to a degree that substantially diminishes or destroys such values;
- Adversely affect groundwater quantities such that the beneficial uses and values of such groundwater are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or
- Present difficulties based on water quality impacts when obtaining a permit or authorization.

4.2.12.1 No Action Alternative

Under the No Action Alternative, no new buildings would be constructed. No additional demands would be placed on the Airport's water system, which would not need to be extended. The existing wastewater septic tank and gravity-fed leach field would not be replaced. Existing groundwater supplies would not be affected.

4.2.12.2 Proposed Action

As noted in Chapter 3.0, two groundwater wells provide potable and firefighting water and are located east of the proposed terminal location. Each well is 143-feet deep and has the capacity to pump up to 500 gallons per minute.

Under the Proposed Action, the proposed terminal building and maintenance building would be connected to the existing Airport water supply system, with the extension of water lines to each building. Water consumption would increase incrementally in response to the forecast levels of passenger enplanements and associated levels of Airport staff.

The TADP determined that the existing water supply wells and 300,000-gallon storage tank system were adequate to supply the potable water and firefighting needs at MMH generated by the projected enplanements.

A proposed multi-staged underground self-contained wastewater treatment plant would be installed west of the proposed terminal building within the TADP footprint. Wastewater would be disposed in a new leach field about 1,000-feet in an up gradient (groundwater) location from the water wells. To protect groundwater resources, the new wastewater system would be subject to Mono County Health Department *Construction Guide for Residential and Commercial On-Site Sewage Treatment & Disposal System* and the Mono County Code of Ordinances Title 14 – Water and Sewage (Appendix F).

The depth to unconfined shallow groundwater varies between approximately 28 and 46 feet below ground surface. Construction activities associated with the Proposed Action would disturb the ground at shallow depths and are not expected to reach the groundwater table. The Proposed Action would not affect local groundwater quality.

4.2.12.3 Avoidance and Conservation Measures

Since neither the Proposed Action nor the No Action Alternative would result in significant impacts on groundwater resources, no measures are required or proposed.

4.3 Cumulative Impacts

4.3.1 Cumulative Impact Evaluation

Potential cumulative impacts of the Proposed Action and the No Action alternative on environmental resource categories are analyzed in Section 4.3.2. Cumulative impacts result from the incremental environmental impacts of the Proposed Action added to other past, present, and reasonably foreseeable future actions. For some environmental issues, the area for which cumulative impacts are evaluated may be expanded beyond the Airport, which has been noted in Chapter 3.0.

CEQ guidance requires an analysis of changes to the human environment from the Proposed Action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the Proposed Action or alternatives, including those effects that occur at the same time and place as the Proposed Action or alternatives and may include effects that are later in time or farther removed in distance from the Proposed Action or alternatives (40 CFR § 1508.7)². Table 4.1 presents a summary of past, present and reasonably foreseeable future action which could involve potential cumulative impacts associated with the Proposed Actions revised by the updated CEQ definition. Neither Mono County nor the Town of Mammoth Lakes has identified

² This EA was prepared using Council on Environmental Quality Regulations adopted November 28, 1978. On July 16, 2020 the CEQ promulgated revised regulations implementing NEPA (40 CFR Parts 1500-1508) that became effective on September 14, 2020. This EA was already in progress before CEQ's final rule was published in the Federal Register (85 FR 43304). Accordingly, the EA was prepared in compliance with the previous version of the regulations, 40 CFR Parts 1500-1508) (1978, as amended in 1986 and 2005).

projects that would contribute to potential cumulative environmental impacts associated with the Proposed Action. The only off-airport project which may contribute to cumulative impacts is a proposed 14 CFR Part 139 certification at Bishop Airport in Inyo County for commercial air service, which could result in reduced commercial air service at MMH.

Table 4.1 Summary of Past, Present and Reasonably Foreseeable Future Action

Location/Distance From MMH	Project Name	Project Description
Past Actions		
On MMH/NA	Reconstruct a portion of the General Aviation (GA) apron (2018)	An Airport Pavement Maintenance Management Plan indicated aircraft traffic had significantly deteriorated the GA apron; reconstruction was necessary to avoid pavement failure caused by deep-seated distress. The project did not involve extraordinary environmental circumstances and no cumulative impact with the proposed TADP would occur.
On MMH/NA	Relocate segmented circle (2019)	Segmented circle relocated to a new location within the ALP in the vicinity of the Proposed Action; no impact since the project involved replacing like- with-like; former location reclaimed. The project did not involve extraordinary environmental circumstances and no cumulative impact with the Proposed Action would occur.
Present Actions		
Bishop Airport (BIH) Bishop/Inyo County: 26 nautical miles; 35 miles via U.S. Hwy. 395 . (Notice of Scoping Workshop/Meeting, Environmental Assessment/Initial Study for the Proposed Airline Service at the Bishop Airport, January 2020)	Proposed Project: Amendment of the Operations Specifications for SkyWest Airlines (Operating as United Express) to allow scheduled commercial air service to BIH, and the issuance of an Airport Operating Certificate (Class I) pursuant to 14 CFR, Part 139. ² January 2020	Inyo County proposes to initiate commercial air service at BIH after obtaining a Part 139 Certification. United Airlines through agreement with SkyWest Airlines operating as United Express) proposes to relocate the air service that currently flies into MMH to BIH as a subsidy is shifted to operations at BIH. There will likely be reduced scheduled commercial aviation operations at MMH as a consequence.

Location/Distance From MMH	Project Name	Project Description
Reasonably Foreseeable Future Actions		
On MMH/NA	Perimeter Wildlife Exclusion Security Fence	A perimeter wildlife exclusion security fence would be constructed near the airport's property boundary in those areas not already secured by a fence to prevent wildlife from entering the operations area and other unauthorized incursions. The project would increase the safety of airport operations. No extraordinary environmental circumstances are anticipated, and no cumulative impact with the Proposed Action would occur.
On MMH/NA	Various Maintenance Projects: Reconstruct a portion of the GA apron. Rehabilitate taxiways. Reconstruct 550 linear feet of the "Hometown" taxilane. Grade taxiway shoulders.	Each project would be evaluated under FAA NEPA guidelines and would be constructed upon approval of AIP grant funding. Maintenance projects are needed to maintain safe conditions and airport operations for aircraft. The projects do not increase paved footprints, are short-term and do not involve extraordinary environmental circumstances. The maintenance projects would not result in a cumulative impact with the Proposed Action.
On MMH/NA	Land Acquisition	Potential land acquisition, approximately 20-acres from the LADWP and 97-acres from the U.S. Forest Service in accordance with the Townsite Act.

4.3.2 Cumulative Impacts of Proposed Action and No Action Alternative

4.3.2.1 Air Quality

Cumulative air quality impacts are both local and regional. Regional impacts typically occur within an air basin. However, as noted in Chapter 3.0, the potentially affected environment for the air quality analysis consists of the Mammoth Lakes Planning Area shown in Exhibit 3-1. As shown in Table 3-2, Mammoth Lakes area is in Attainment of all NAAQS criteria pollutants with the exception of PM₁₀ for which it is designated as a Maintenance area.

As described in Section 4.2.1.2, criteria air pollutant emissions from both Proposed Action and No Action construction and operations would not exceed the general conformity *de minimis* thresholds. Given this, Proposed Action and No Action operational emissions would not have a cumulative impact on air quality.

Should commercial air service transition to BIH, increased vehicle traffic between Bishop and Mammoth Lakes could occur and a potential impact on regional air quality may result. However, it is not possible to determine the extent of the potential impacts, since no transportation plan to move people to and from Bishop and the Town has been released. Implementation of the Proposed Action at MMH is *de minimis*, therefore no contribution to potential regional air quality impacts would occur.

4.3.2.2 Biological Resources

The loss of 19 acres of sagebrush scrub habitat is not considered a significant cumulative impact, since other projects on the Airport have generally been limited to existing paved surfaces. There are no other planned projects which involve the loss of Sagebrush scrub habitat within the Airport vicinity. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on biological resources.

4.3.2.3 Climate

GHG emissions are related to global climate change. As discussed in Section 4.2.3, the FAA has not identified significance thresholds for aviation GHG emissions, nor has the FAA identified specific factors to consider in making a significance determination for GHG emissions. There are currently no accepted methods of determining significance applicable to aviation projects given the small percentage of emissions they contribute. As such, the cumulative impacts of the Proposed Action and the No Action Alternative are not analyzed in this EA.

4.3.2.4 Department of Transportation Act, Section 4(f)

The extension of Airport Road over land administered by the Inyo National Forest, but within an existing transportation easement, would remove about 1.0-acre of land for recreation and grazing uses. However, the USDA-FS concurred with the FAA that DOT Act Section 4(f) did not apply to the Proposed Action. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on DOT Section 4(f) properties.

4.3.2.5 Hazardous Materials, Solid Waste, and Pollution Prevention

MMH is surrounded by publicly owned land with limited development opportunities and no development is planned that would contribute to hazardous waste conditions. Past and reasonably foreseeable projects shown in Table 4-1 would not contribute to hazardous waste conditions since they would conform to applicable water quality permits and conditions. Although PFAS containing AFFF would continue to be stored, AFFF would not be used to demonstrate the readiness of firefighting equipment, a process which could lead to soil and groundwater contamination. As such, there would be no increase in the use or storage of hazardous materials in the vicinity, nor significant increased solid waste generation.

The application of de-icing fluids could decrease if commercial air passenger service transitions to BIH, since fewer aircraft would use MMH during the winter. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on hazardous materials, solid waste, and pollution prevention.

4.3.2.6 Historical, Architectural, Archaeological, and Cultural Resources

As described in Section 4.2.4.2, there are no resources on Airport property that are eligible for listing on the National Register of Historic Places. The Airport is in an area of limited development, and no development is planned to occur in the Airport vicinity, other than on the Airport property. The Proposed Action would not have a significant cumulative impact on historical, architectural, archaeological, and cultural resources.

4.3.2.7 Land Use

The Airport is in an area of limited development, and no development is planned to occur in the Airport vicinity, other than on the Airport property. Existing General Plan and zoning designations on the Airport property and vicinity would remain, which would limit future development to existing developed sites and leave most of the area in rural or open space conditions. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on land use.

4.3.2.8 Natural Resources and Energy Supply

Since no development is planned to occur in the Airport vicinity, other than on the Airport property (see Section 4.3.2.7). As such, there would be no significant increase in the use of natural resources other than potential future improvements of the Airport. As described in Section 4.5.2.2, California has developed an Energy Code that requires new construction to implement energy efficiency measures, and it has adopted a Renewables Portfolio Standard that would substantially reduce the production of electricity from fossil fuel sources. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on natural resources and energy supply.

4.3.2.9 Noise and Noise-Compatible Land Use

Aircraft activity and associated aircraft-related noise would occur independent of the Proposed Action and the No Action Alternative. The 65 dB contour remains on the Airport. Most of the

anticipated future projects involving the Airport are not expected to increase noise levels, as they would not affect projected aircraft activity. However, if commercial air service transitions to BIH, fewer scheduled commercial aircraft operations would occur at MMH, which would decrease noise generated by aircraft activity.

4.3.2.10 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

As described in Section 4.2.10.2, there are no residences or other land uses in the Airport vicinity that are occupied by environmental justice communities or offer services that could disproportionately affect children; most such land uses are in the Town proper approximately six miles away. The Proposed Action may contribute to the expansion of the revenue generated from Airport-based businesses. The Proposed Action would not result in a cumulative impact on socioeconomics, environmental justice, and children's environmental health and safety risks. Should air service transition to BIH, revenues generated at MMH would decrease, impacting sales tax and airport operating funds.

4.3.2.11 Visual Effects

The Airport is in an area of limited development and no development is planned to occur, other than on the Airport property. Development is limited by the proximity of U.S. Forest Service land. The visual conditions in the area, particularly from U.S. Highway 395, a designated scenic highway, would not substantially change from existing conditions. Neither the Proposed Action nor the No Action Alternative would have a significant cumulative impact on visual effects.

4.3.2.12 Water Resources: Groundwater

Since no development is planned to occur in the Airport vicinity, other than on the Airport property (see Section 4.3.2.7), there would be no substantial increase in water use and no additional wastewater disposal systems. As noted in Section 3.2.8, there is adequate water supply for any future increases in passenger volumes. Neither the Proposed Action nor the No Action Alternative would have a substantial cumulative impact on groundwater resources.

CHAPTER 5.0 COORDINATION AND PUBLIC INVOLVEMENT

5.1 Agency Coordination and Public Involvement

Agency coordination and public involvement is required to meet federal review requirements under NEPA and applicable special purpose laws. For purposes of project scoping, a Notice of Intent to prepare a Draft Environmental Assessment was sent to federal, state, and local agencies, regional Tribes and to interested individuals.

Federal Agencies Consulted:

- U.S. Fish and Wildlife Service
- U.S. Forest Service, Inyo National Forest (See Appendix G for supporting materials for the U.S. DOT Section 4(f) coordination process with the U.S. Forest Service, Inyo National Forest)

State of California Agencies Consulted:

- State Historic Preservation Officer (SHPO) (See Appendix D for supporting materials for NHPA Section 106 and FAA consultation correspondence with California SHPO)
- California Department of Fish and Wildlife
- Regional Water Quality Control Board
- California Department of Transportation, Division of Aeronautics

Local Agencies Consulted:

- Mono County Planning Department
- Mono County Department of Environmental Health
- Mammoth Community Water District

5.2 Public Scoping Local

On October 19, 2019 the Town published a Notice of Public Scoping to Prepare an Environmental Assessment, Mammoth Yosemite Airport, Terminal Area Development Plan in *The Sheet*. The notice was also posted on the Town website. The public scoping comment period extended for 30 days and ended at 5 pm on November 18, 2019. Additionally, on October 24, 2019, the Town held a public scoping meeting in Town offices to present the project and accept public scoping comments. No scoping comments were received from the public.

Appendix I, Agency Coordination and Public Involvement provides the scoping Local letters, Scoping Information Package, and any scoping comments received.

5.3 Public Review

This Draft Environmental Assessment (DEA) was made available for review and comment by the general public and agencies for a period of 35 days from June 19, 2021 through July 23, 2021. On July 19, 2021, the Town scheduled a virtual workshop to offer the public

information regarding the proposed project and address questions, immediately followed by a virtual public hearing to take public comments.

A Notice of Availability (NOA) for the DEA was published in the "legal notice" section of *The Sheet*, a newspaper of general circulation, on June 19, 2021.

The DEA was available electronically for public review on the Town of Mammoth Lakes' website at <https://www.townofmammothlakes.ca.gov>; printed copies of the DEA were available for public review at the following locations:

Town of Mammoth Lakes
Community and Economic Development Department
Planning Division
437 Old Mammoth Road, Suite 230
Mammoth Lakes, CA 93546
Monday through Thursday, 8 a.m. to Noon and 1 p.m. to 5 p.m.
Friday, by appointment
(760) 965-3630

Mammoth Yosemite Airport
1300 Airport Road
Mammoth Lakes, CA 93546
By appointment
(760) 965-3622

Mono County Library
Mammoth Lakes Branch
400 Sierra Park Road
Mammoth Lakes, CA 93546
Open with limited services
Monday through Friday, 10 a.m. to 7 p.m.
Saturday, 10 a.m. to 5:30 p.m.
(760) 934-4777

CHAPTER 6.0: LIST OF PREPARERS

The professionals primarily responsible for preparing, or the review of this EA are listed in Table 6.0.

Table 6.0 List of Preparers and Reviewers

Name	Title and Role	Contribution	Relevant Experience
Reviewer: Federal Aviation Administration			
Camille Garibaldi	Environmental Protection Specialist, Project Manager. San Francisco Airports District Office.	Detailed FAA evaluation of the NEPA document and regulatory agency consultations.	25 years of environmental experience
Reviewer: Town of Mammoth Lakes			
Grady Dutton	Town of Mammoth Lakes, Director of Public Works, Airport Manager	EA Review; FAA coordination	32 years of experience in civil and aviation infrastructure
Sandra Moberly	Town of Mammoth Lakes, Community & Economic Development Director	EA Review	18 years of experience in environmental compliance documentation
Kim Cooke	Town of Mammoth Lakes, Associate Planner	EA Review	7 years of experience in environmental compliance documentation
Prepared By:			
Jim Wallace	Project Manager: Wallace Environmental Consulting, Inc.	Primary Author	25 years of experience as a NEPA consultant on airport projects.
Donald Moore	Senior Advisor: Wallace Environmental Consulting, Inc.	Groundwater	30 years of experience in groundwater and water development.
Hunter Gallant	Salix Consulting GIS Specialist	Visual and Photo Simulations	10 years of experience in GIS and photo simulations.
Jeff Glazner	Salix Consulting Senior Biologist	Biological Resources	25 years of experience in biological resources and wetland mapping
Cindy Arrington	Senior Cultural Resources Consultant: Natural Investigations Company	Cultural Resources	25 years of experience in cultural resources and archeology
Nancy Sikes	Senior Cultural Resources Consultant: Natural Investigations Company	Cultural Resources	30 years of experience in cultural resources and archeology
Corbett Smith	Senior Planner, Aviation Services Mead & Hunt	Noise Modeling	15 years of experience in aviation consulting and acoustical modeling

CHAPTER 7.0: REFERENCES

Biological Assessment for the Mammoth Yosemite Airport Wildlife Hazard Management Plan, 2015, prepared by Wallace Environmental Consulting

Biological Resources Assessment for the Mammoth Yosemite Terminal Area Development Plan Study Area, Mono County, California, prepared by Salix Consulting, Inc, January 2020, Revised April 2021

Eastern Sierra Housing Needs Assessment, March 2005, prepared by The Eastern Sierra Council of Governments

Federal Aviation Administration, Advisory Circular No. 150/5360-13A, Airport Terminal Planning, July 13, 2018

Federal Aviation Administration, Order 1050.1F, Environmental Impacts: Policies and Procedures, July 16, 2015

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Federal Aviation Administration, Order 5050.4B, National environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, April 28, 2006

Mammoth Yosemite Airport, Aviation Activity Forecast, 2019 Addendum, prepared by Mead and Hunt, May 15, 2019

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Town of Mammoth Lakes, Air Quality Maintenance Plan and PM-10 Redesignation Request for the Town of Mammoth Lakes, November 6, 2013

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U.S. Forest Service, *Final Environmental Impact Statement for Revision of the Inyo National Forest Land Management Plan*, August 2018

U.S. Forest Service, *Land Management Plan for the Inyo National Forest*, September 2019