

1.0 INTRODUCTION

1.1 PROPOSED AIR SERVICE AND FAA RESPONSIBILITY

This document is the Final Environmental Impact Statement (EIS) by the Federal Aviation Administration (FAA) prepared to analyze potential environmental impacts of the proposed operations specifications amendment approval related to the scheduled commercial air service into Mammoth Yosemite Airport (MMH) by Horizon Air.

1.1.1 The Proposed Air Service at MMH

Horizon Air initially proposes to conduct two-daily flights from Los Angeles International Airport (LAX) to MMH using their Bombardier DHC 8-402 (Q400 Dash 8) aircraft. The Q400 Dash 8 is part of the Bombardier Dash 8 family of turbo-propeller driven passenger aircraft. A depiction of a Horizon Air Q400 aircraft is presented in [Figure 1.1-1](#). The Q400 Dash 8 can seat up to 78 people. Horizon Air has provided the FAA with a letter of intent to initiate winter ski season passenger service into MMH. [Appendix A](#) includes a copy of the Horizon Air letter of intent. The winter ski season service would be subsidized by the Mammoth Mountain Ski Resort. The projected summer service would not be subsidized.

Horizon Air is proposing to begin scheduled regional air carrier service to MMH beginning in December 2008 with two flights per day from LAX during the winter ski season (approximately December to April). The Town of Mammoth Lakes has prepared and submitted to FAA a forecast of future commercial aviation activity at MMH. The FAA has reviewed and approved this forecast, which is discussed further in [Section 1.3](#). Winter ski service is projected to increase to a maximum of eight flights per day by the year 2011. The aviation activity forecast for MMH also considers the addition of two flights per day during the summer months beginning in 2012.

1.1.2 FAA's Responsibilities

Certification Responsibilities

Title 14 Code of Federal Regulations (CFR) Part 119 governs the operations of all U.S. air carriers and commercial operators in air commerce. A person wishing to provide air carrier services must obtain an Air Carrier Certificate. Air Carrier Certificates include operations specifications that establish the authorizations, limitations, and certain procedures under which each kind of operation, if applicable, is to be conducted; and certain other procedures under which each class and size of aircraft is to be operated. Proposed amendments to an air carrier's operations specifications require approval by the FAA. The Administrator of the FAA may amend any operations specifications issued under 14 CFR Part 119 if:

- The Administrator determines that safety in air commerce and the public interest require the amendment; or
- The certificate holder applies for the amendment, and the Administrator determines that safety in air commerce and the public interest allows the amendment.

The establishment of scheduled commercial service into MMH also requires an administrative action to change the Town's Operating Certificate for MMH from Class IV to Class I, pursuant to 14 CFR Part 139. Airports with a Class I certificate may provide scheduled service by aircraft capable of carrying 30 or more passengers, while airports with a Class IV certificate may provide unscheduled service by aircraft of a similar size. The proposed air service would utilize the existing airport runway and facilities, with no runway extensions or other airside improvements. The Town of Mammoth Lakes has submitted a Form 5280-1 to FAA to request an amendment to their 14 CFR Part 139 Certificate and Certification Manual for MMH. A copy of this form is included in [Appendix A](#). The Town intends to remodel an existing maintenance building to serve as a passenger terminal. The remodeling of the maintenance building to serve as a passenger terminal does not require FAA approval. The Town's warehouse remodel is an action considered in the cumulative impact section of this EIS.

Environmental Responsibilities

The FAA, as lead Federal agency, is preparing this EIS to consider the potential environmental impacts of FAA approval of Horizon Air's Airline Operations Specifications Amendment to accommodate the proposed scheduled air service into MMH. The FAA is responsible for complying with the National Environmental Policy Act (NEPA) prior to taking any agency action regarding Horizon Air's proposed service to MMH. Several types of environmental documentation are available to the FAA in meeting its NEPA obligation under FAA Order 1050.1E, *Policies and Procedures for Considering Environmental Impacts*, including Categorical Exclusions, Environmental Assessments (EA), or Environmental Impact Statements. Approvals of operations specifications amendments normally qualify for a Categorical Exclusion pursuant to Paragraph 208d of the Order when the proposed action does not significantly change the operating environment of the airport. Preparation of further environmental analysis such as this EIS for an operations specifications amendment is required only when there are extraordinary circumstances pursuant to Paragraph 304 of the Order. In making the determination to prepare this EIS, the FAA considered the following circumstances specific to the Proposed Action:

- The level of public environmental controversy associated with an EA prepared for the previous proposal to extend the runway at MMH for commercial service by Boeing 757 aircraft,
- The litigation concerning the prior proposal to expand the airport and the associated EA, Finding of No Significant Impact (FONSI), and Record of Decision (ROD), and
- The environmental concerns regarding natural, ecological, or scenic resources associated with increased visitation, associated induced growth, and noise.

The environmental evaluation of the Proposed Action within this EIS is subject to a variety of laws, regulations, and agency directives to assess the level of potential impact to natural (e.g., fish, wildlife, plants), physical (e.g., water resources, air quality), and human (e.g., land use, environmental justice) environments. [Appendix B](#) of this EIS contains a list of Federal laws and statutes, Executive Orders, pertinent Federal Aviation Regulations, Department of Transportation (DOT)/FAA Orders, and FAA Advisory Circulars (AC) considered in the development of this EIS.



Sources: www.alaskaair.com, 2006



Environmental Impact Statement
Mammoth Yosemite Airport
Horizon Air Operations Specifications
Amendment Service to/from MMH

PHOTOGRAPH OF Q400 AIRCRAFT

FIGURE
1.1-1

1.2 BACKGROUND

1.2.1 Description of the Airport

The Town of Mammoth Lakes is the owner and operator of MMH. The Town holds a Class IV certificate for MMH pursuant to 14 CFR Part 139. Under this classification, unscheduled air carrier operations can be provided using aircraft capable of carrying 30 or more passengers. The airport is located approximately six miles east of the Town of Mammoth Lakes and north of U.S. 395 in Mono County with a field elevation of 7,128 feet above mean sea level (see [Figures 1.2-1, 1.2-2, and 1.2-3](#)). The airport has one east-west oriented runway (9/27) with a parallel and connecting taxiway system. Runway 9/27 is paved with asphalt and is 7,000 feet long by 100 feet wide. A Global Positioning System (GPS) non-precision instrument approach is available to Runway 27. The airport intermittently experiences crosswind conditions that limit arrivals by light general aviation (GA) aircraft or require avoidance of a part of the runway. However, these conditions are not projected to substantially affect the operation of heavier aircraft such as the Q400. Horizon Air has indicated that the maximum crosswind limit for the Q400 aircraft is 32 knots on a dry paved runway (Horizon Air, 2007).

The airport provides facilities that can accommodate commercial airlines, commuter airlines, and support/maintenance for unscheduled operations. The airport also accommodates GA aircraft activity including aircraft hangars and outdoor tiedowns. The airport has six based aircraft and accommodates approximately 12,800 annual aircraft operations. Over the past 30 years, scheduled commercial service has been provided at the airport. From 1973 to 1980, MMH accommodated commercial airline service from Sierra Pacific Airlines using Convair 440 aircraft. In 1985, Trans World Express began commuter service to Los Angeles and San Francisco using 19-seat Beechcraft 1900 aircraft (Note that both the Convair 440 and Beechcraft 1900 are powered by propellers driven by a turbine engine – commonly referred to as a “turboprop.”). Turbojet service to MMH occurred during the 1987 ski season using the 4-engine BAe aircraft operated by Royal West Airlines. During the winter seasons of 1992 and 1993, United Express operated 19-seat Jetstream 31 turboprop aircraft. At the current time, there is no commercial service provided at MMH.

1.2.2 History of Recent Air Service Proposals at MMH

Former Long Haul Service Proposal

In the late 1990s, Mammoth Mountain Ski Area and American Airlines, along with the Town of Mammoth Lakes, initiated a proposal to resume scheduled air service to MMH. This proposal contemplated a major airport expansion and substantial new construction to accommodate long-haul service by B757-200 aircraft between MMH and Chicago (ORD) and Dallas/Fort Worth (DFW). The improvements required to serve this aircraft type would have required FAA approval of a revised Airport Layout Plan (ALP) and approval of further processing of an application for Federal financial/funding assistance or authority to impose and use a passenger facility charge to pay for the improvements.

The proposed expansion included lengthening, widening, and strengthening the existing runway to an overall length of 8,200 feet and a width of 150 feet. The runway was to be strengthened to be able to accommodate aircraft up to the size of a Boeing 757-200. Additional improvements included lengthening

and strengthening of the parallel taxiway, expansion of the aircraft apron to be able to accommodate the new design aircraft, and construction of a new passenger terminal.

A Draft EA was published by the Town of Mammoth Lakes for the airport expansion described above in October 2000. A Final EA for MMH expansion was published in December 2000. The FAA approved and adopted the Final EA as a Federal document, and issued a FONSI on December 21, 2000. Following FAA's issuance of the FONSI, additional and supplemental information regarding the proposed expansion became available. On July 29, 2002, the FAA issued a Record of Decision (ROD) that reexamined the December 21, 2000 FONSI, and approved the Town of Mammoth Lakes' proposed expansion plan for the airport.

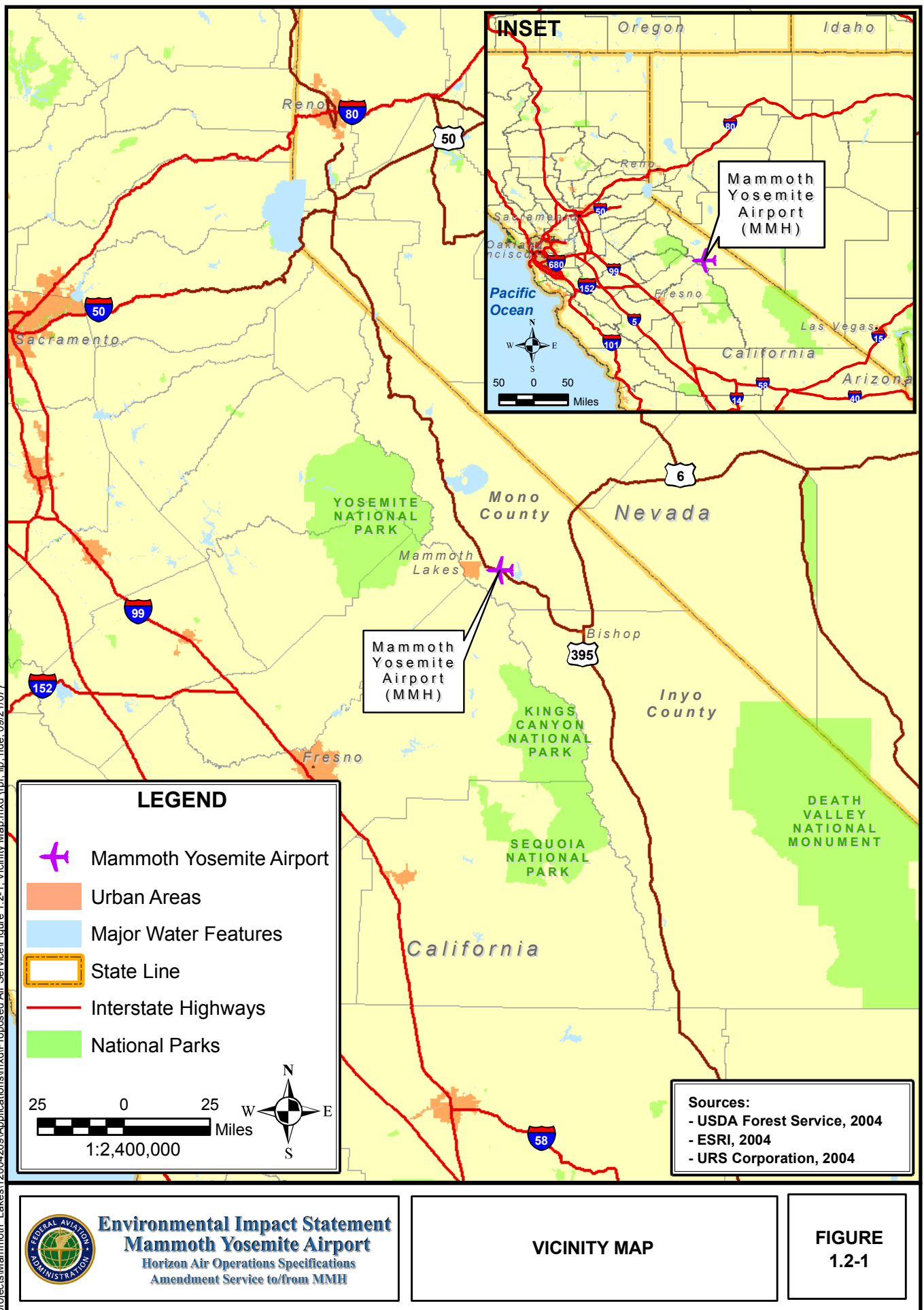
Subsequent to the publication of FAA's ROD, litigation was filed against the FAA in two civil cases numbered C02-04621 BZ and C02-04623 BZ in the United States District Court for the Northern District of California. Concerns expressed in the civil cases included the failure of the EA to properly consider the impacts on natural resources that would result from increased visitation to the Eastern Sierras region, as well as the failure of the EA to properly consider the impacts of associated housing and lodging growth projected to result from the implementation of commercial air service at MMH. Other concerns expressed in the litigation included projected impacts on water quality and air quality, traffic impacts of increased summer visitation, potential impacts on protected species such as the Owens tui chub and bighorn sheep, and the cumulative impacts of the proposed airport expansion in light of other planned projects in the area of the airport. On April 28, 2003, an opinion was issued by the Court that required FAA to prepare an EIS to further evaluate the Town of Mammoth Lakes' proposed expansion project for MMH.

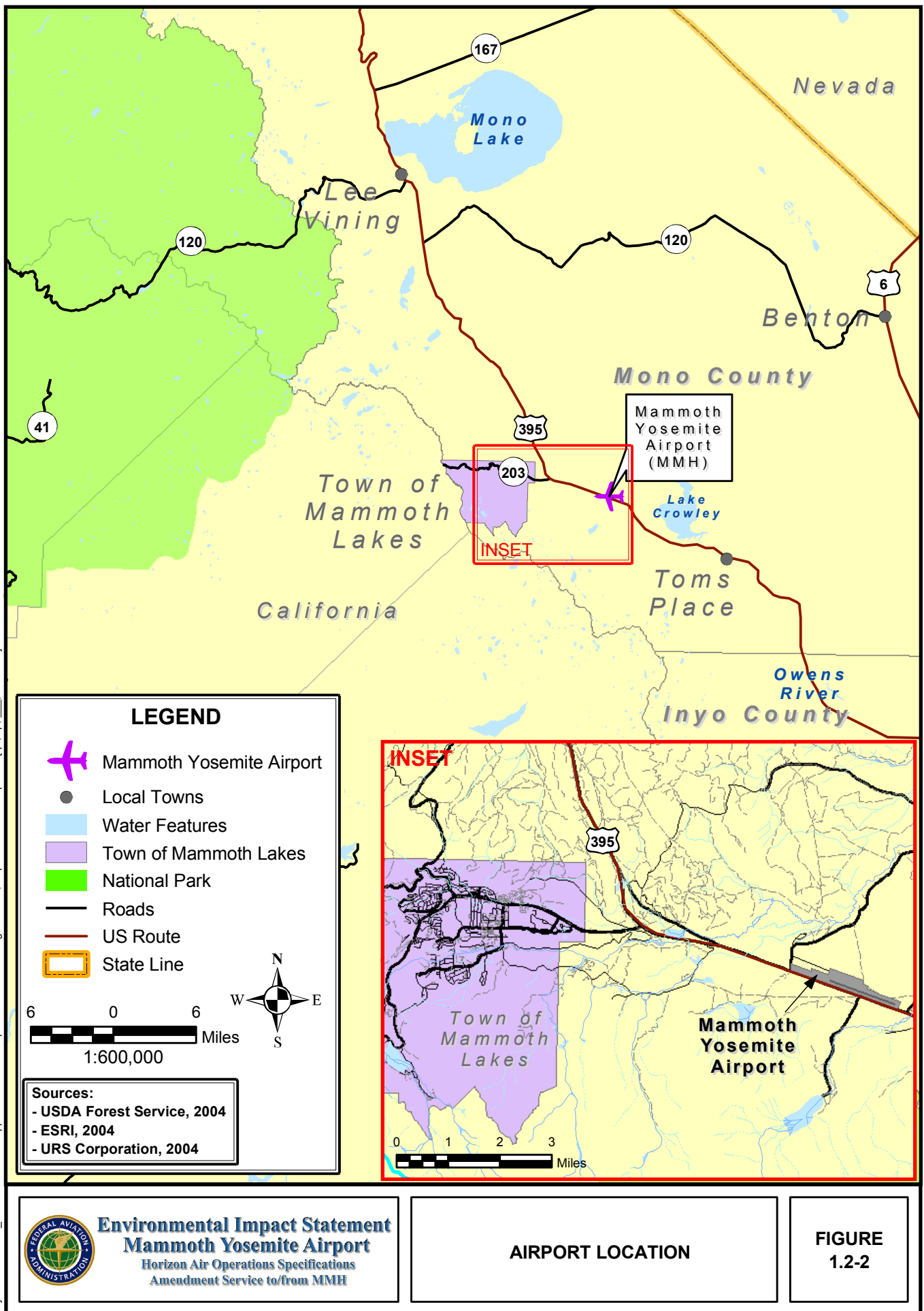
In September 2003, the Town entered into a Memorandum of Understanding (MOU) with the FAA regarding the preparation of an EIS for the same proposed airport improvements. FAA published in the *Federal Register* of November 5, 2003, a Notice of Intent (NOI) for the preparation of the EIS. On October 28, 2005, the FAA stopped work on the proposed airport expansion EIS.

New Interest in Regional Air Service

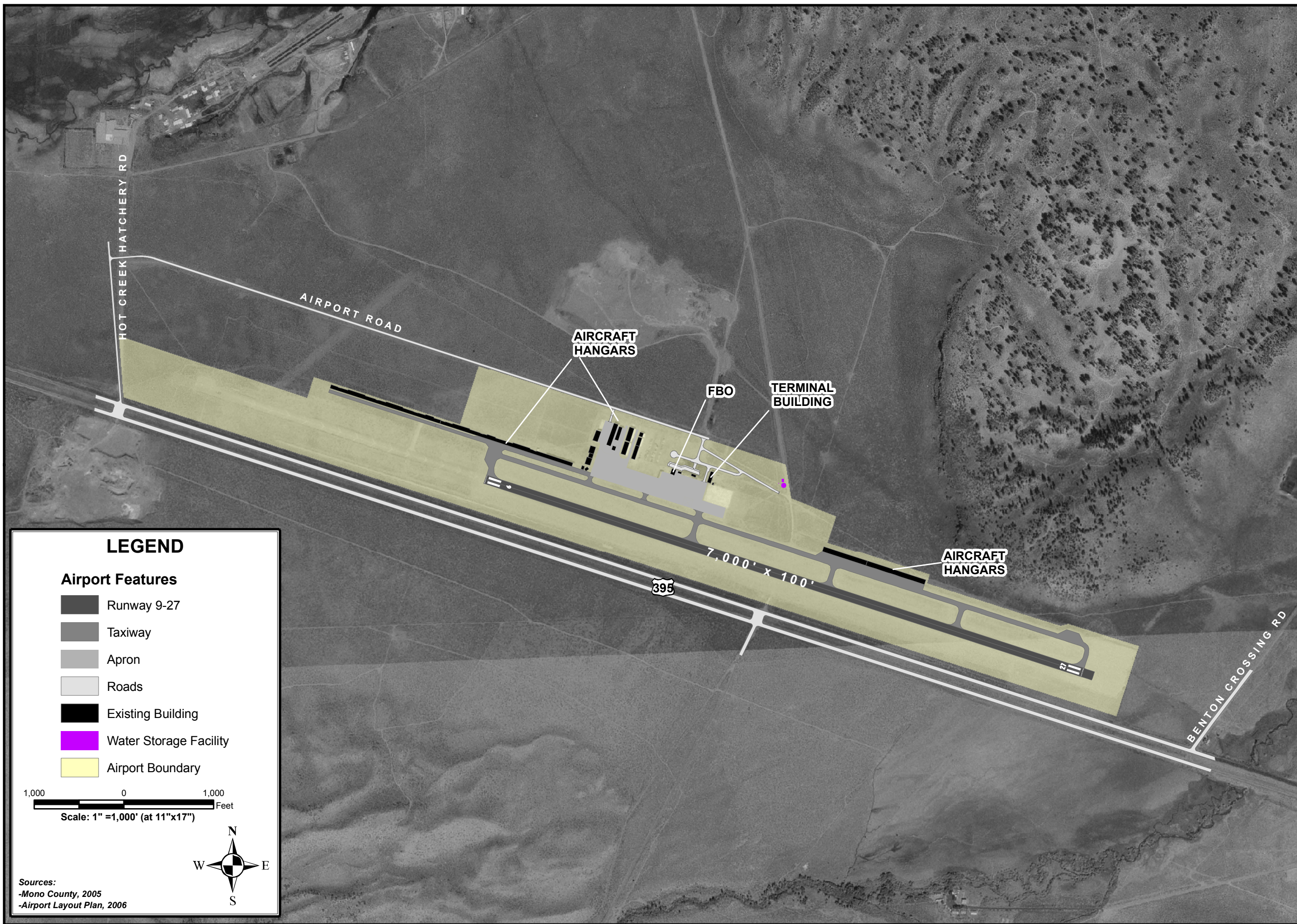
In the fall of 2005, the Town held a public forum to discuss an alternative to the proposal for long-haul service, that being a resumption of regional service similar to that which existed in the 1970s, 1980s, and through the mid-1990s. This dialogue was initiated to address the changing dynamics of the airline industry and the changing needs of the community. In response to this process, Horizon Air indicated its intent to provide scheduled air service that was regional in nature and that could be accommodated by the existing runway and facilities at MMH.

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H:\projects\Mammoth_Lakes\12004269\Applications\mxd\Proposed Air Facility\Figure 1.2-3_Existing Airport Facilities.mxd, (pdf, hde, 09/27/07)



Sources:
-Mono County, 2005
-Airport Layout Plan, 2006



EXISTING AIRPORT FACILITIES

FIGURE
1.2-3

1.3 AVIATION FORECASTS

The Town of Mammoth Lakes has provided to FAA a forecast of future commercial aircraft operations and enplanements at MMH. The forecast was prepared based on Horizon Air's intent to provide scheduled commercial air service to MMH. A copy of the Town's forecast package is included in [Appendix A](#). The FAA has reviewed this forecast and approved it for use in preparing this EIS on August 21, 2006. A copy of the forecast approval letter is included in [Appendix A](#). The commercial forecast is summarized in [Table 1.3-1](#). The Terminal Area Forecast (TAF) for MMH updated by FAA in 2006 provides a projection of future non-commercial activity at MMH and is also included in [Appendix A](#).

Projected Horizon Air Flights

The forecast developed by the Town and approved by the FAA projects that scheduled commercial air service will start with two flights per day from Los Angeles to MMH for the winter ski season only. This forecast is based on the letter of intent from Horizon Air, and the willingness of the Mammoth Mountain ski resort to reimburse or subsidize the service. Within the EIS study period (2008-2015), the number of flights per day is projected to increase from two to eight as additional regional markets such as Las Vegas, Northern California, San Diego, or an alternative Southern California market are added. Winter service is not expected to exceed eight flights per day during the EIS study period due to airport facility physical constraints (e.g., terminal capacity, apron area). Initial scheduled commercial air service would start during the daytime with one morning and one afternoon flight, and no aircraft would be scheduled to remain at the airport overnight.

Commercial flights into MMH during the summer months from LAX are forecast to begin in the fifth year following reintroduction of winter ski season service. Summer flights would be an unsubsidized service, and the lower number of daily summer flights reflects both this factor and the demographics and activities of summer visitors. Summer flights are anticipated to occur during daylight hours, similar to the proposed winter service.

Enplanements

The term "enplanements" is used to measure airline passenger activity. An enplanement occurs when a passenger boards an aircraft. The projected number of seats filled per flight (load factor) for the flights into MMH are based on historic traffic patterns from other mountain resorts such as Vail, Colorado; Steamboat Springs, Colorado; and Jackson Hole, Wyoming. The first year winter service forecast starts with a 57 percent Load Factor because the service is expected to attract high use only on peak days. However, marketing efforts and greater consumer awareness are expected to attract destination visitors, and the enplanement forecast reflects an 85 percent Load Factor within three years. The reduced load factor used for the summer forecast reflects that lack of subsidies expected to be offered for the summer flights.

**TABLE 1.3-1
MMH COMMERCIAL AVIATION FORECAST**

Year	Number of Flights/Day	Plane Capacity	Number of Days	Load Factor	Projected Enplanements	Destination Airport
FY 2008-09 Winter	2	80	112	57%	10,214	2 x LAX
FY 2009-10 Winter	4	80	112	65%	23,296	3 x LAX 1 x SFO*
FY 2010/11 Winter	6	80	112	82%	44,083	3 x LAX 2 x SFO*; 1 x LAS
FY 2011/12 Winter	8	80	112	85%	60,928	3 x LAX; 2 x SFO* 2 x LAS; 1 x SAN**
FY 2012/13 Summer Winter Total	2	80	60	57%	5,472	2 x LAX
	8	80	112	85%	<u>60,928</u>	3 x LAX; 2 x SFO*
					66,400	2 x LAS; 1 x SAN**
FY 2013/14 Summer Winter Total	2	80	60	65%	6,240	2 x LAX
	8	80	112	85%	<u>60,928</u>	3 x LAX; 2 x SFO*
					67,168	2 x LAS; 1 x SAN**
FY 2014/15 Summer Winter Total	2	80	60	65%	6,240	2 x LAX
	8	80	112	85%	<u>60,928</u>	3 x LAX; 2 x SFO*
					67,168	2 x LAS; 1 x SAN**
FY 2015/16 Summer Winter Total	2	80	60	65%	6,240	2 x LAX
	8	80	112	85%	<u>60,928</u>	3 x LAX; 2 x SFO*
					67,168	2 x LAS; 1 x SAN**
FY 2016/17 Summer Winter Total	2	80	60	65%	6,240	2 x LAX
	8	80	112	85%	<u>60,928</u>	3 x LAX; 2 x SFO*
					67,168	2 x LAS; 1 x SAN**

* San Francisco or an alternate Northern California airport.

** San Diego or an alternate Southern California airport.

Source: Town of Mammoth Lakes, 2006.

1.4 ORGANIZATION OF THIS DOCUMENT

This EIS is arranged by section and has several attached appendices that provide detailed technical information to supplement material in the body of the document. The sections and appendices, along with their primary subject area, are listed below:

Volume I

- Section 1 - Introduction
- Section 2 - Purpose and Need
- Section 3 - Alternatives
- Section 4 - Affected Environment
- Section 5 - Environmental Consequences

- Section 6 - List of Preparers
- Section 7 - Coordination and Public Involvement
- Section 8 - Index
- Section 9 - References
- Section 10 - List of Abbreviations and Glossary

Volume II

- Appendix A - Airport Planning
- Appendix B - Regulations and Guidelines
- Appendix C - Noise
- Appendix D - Air Quality
- Appendix E - Socioeconomics

Volume III

- Appendix F - Department of Transportation Section 4(f) Resources
- Appendix G - Agency Consultation
- Appendix H - Fish, Wildlife, and Plants
- Appendix I - Public Involvement
- Appendix J - Water Quality
- Appendix K - Lists of Cumulative Projects

Volume IV

Appendix L - Comments on Draft EIS and Responses