

MAMMOTH COMMUNITY WATER DISTRICT

Initial Study/Mitigated Negative Declaration

Pursuant to the California Environmental Quality Act and CEQA Guidelines, the Mammoth Community Water District proposes to adopt a Mitigated Negative Declaration for the following project:

- 1. Project title:** Update to MCWD Sludge Hauling Operations
- 2. Lead agency name and address:** Mammoth Community Water District, 1315 Meridian Blvd, P.O. Box 597, Mammoth Lakes, CA 93546
- 3. Contact person and phone number:** Betty Hylton, 760-934-2596 ext. 274
- 4. Project location:** The Update to MCWD Sludge Hauling Operations is an operational change to the District's hauling and disposal of sludge. Sludge will be stored on District property at 1315 Meridian Blvd., Mammoth Lakes, CA 93546 and then hauled from the District to Russell Pass Landfill in Fallon, Nevada, located at 39°14'9.7" N, 118°44'51.5" E.
- 5. Project sponsor's name and address:** Same as lead agency
- 6. General plan designation:** Industrial
- 7. Zoning:** Public & Quasi-Public
- 8. Description of Project:**

The Mammoth Community Water District (District) provides water and wastewater services to meet the health and safety needs of the community of Mammoth Lakes. The District operates an activated sludge wastewater treatment plant, one of the byproducts of which is sludge. When wastewater influent enters the District's wastewater treatment plant, it first passes through grit removal (removal of small nonorganic material such as sand and rocks) and trash removal. Influent then begins the treatment process in the primary clarifier, where the majority of solids are removed. Effluent from the primary clarifiers is then treated in conventional activated aeration tanks for carbonaceous biochemical oxygen demand removal, which is followed by secondary clarifiers, tertiary media disk filtration, and chlorine disinfection. Currently, the waste activated sludge and primary sludge is processed through an aerobic digester, dewatered with a belt dewatering press (BDP), and hauled by the District to the Benton Crossing Landfill where it is used as alternative daily cover.

With this Project, the District is proposing to update its sludge dewatering, hauling and disposal operations. Currently, the District disposes of sludge produced by the wastewater treatment plant at the Benton Crossing Landfill in Mono County via a District-owned 13-ton capacity dump truck. Sludge hauling trips from the District to the Benton Crossing Landfill vary from 3 to 12 trips per week depending on demand, which fluctuates greatly due to seasonal visitation from transient populations within the service boundary. On average, from 2015-2019, 236 annual trips were made to Benton Crossing Landfill, amounting to 2,926 tons of sludge disposed of annually. However, the Benton Crossing Landfill is scheduled to close in 2023. In response, the District is considering the proposed Project to ensure continued sludge disposal.

The Project proposes to cease hauling sludge to the Benton Crossing Landfill located at 899 Pit Road, Crowley Lake, California and start hauling sludge to the next closest landfill which will accept sludge produced from the District, Russell Pass Landfill, which is located 17.2 miles south of Fallon, Nevada.

The round-trip mileage from the District to Benton Crossing Landfill is approximately 26.6 miles. The round-trip mileage from the District to Russell Pass Landfill is approximately 288 miles. Accordingly, vehicle miles traveled (VMT) per sludge hauling trip would increase by around 261.4 miles under the Project.

The District is implementing two operational upgrades as a part of the proposed Project to decrease the VMT to dispose of sludge waste, as described below:

1. Increase capacity and efficiency of hauling trailer:

The District currently utilizes a 13-ton capacity dump truck to haul and dispose of sludge at the Benton Crossing Landfill. For the proposed Project, the District would utilize three 24-ton capacity trailers. Operating with three trailers would afford the District sludge storage, including when loads are transported to the Russell Pass Landfill and avoid interfering in District operations. In contrast, the District's current sludge hauling operations do not allow for storage when the dump truck is hauling the sludge. Access to sludge storage ensures that every hauling trip is maximized by only hauling trailers that are filled to capacity.

The additional hauling capacity in each trailer would decrease the number of hauling trips required. Currently, the average VMT annually to dispose of sludge is 6,277 miles, with the 13-ton capacity dump truck making, on average, 236 trips annually at a distance of 26.6 miles roundtrip. If the District continued to utilize the 13-ton capacity dump truck, the round-trip distance to Russell Pass Landfill (288 miles) would increase the VMT annually to dispose of sludge to 67,968 miles. Increased trailer capacity would significantly decrease the number of trips by almost half, to an average of 122 trips annually or 35,136 VMT annually.

2. Increase solids content in sludge to reduce weight:

Currently, the District utilizes a BDP that produces sludge with an average of 15% solids content (dryness by weight), with water content to make up the remaining 85%. In 2019, the District completed a pilot study utilizing a screw press to increase the solids content of the sludge (Patel, 2019). The pilot study found that the screw press produces, on average, 24.7% solids content. Increased solids content reduces the water in sludge and overall tonnage required to be hauled. On average, the District's wastewater treatment plant produces 439 tons of solids annually. The currently implemented BDP technology results in the District hauling a total of 2,926 tons of sludge annually. Upgrading to a screw press would reduce the tonnage of sludge hauled by increasing the solids content which reduces the water to solids ratio in the sludge, thus reducing the weight and volume of sludge produced. Specifically, increased solids content to 24.7% as a result of the screw press, reduces sludge hauled, on average, to 1,777 tons annually. The reduction in tonnage hauled to 1,777 reduces the number of trips (with utilization of the larger capacity trailers) to 74 trips annually for an average of 21,324 VMT annually.

The proposed Project is primarily a sludge hauling operational change, with two upgrades implemented to reduce the number of trips required to dispose of District sludge.

9. Surrounding land uses and setting:

The District property is surrounded by United States Forest Service managed lands and is zoned public & quasi-public. The proposed trailer storage location for the Project is located within an existing building (the press building) and adjacent to the press building, on an already paved surface,

located on District property. To the west, across Meridian Boulevard, is the Industrial Park for the Town of Mammoth Lakes. State Highway 203 runs northeast of District property. A paved, multi-use path crosses beneath Meridian Boulevard and runs near the southwestern portion of the District property. The Project's storage trailers will not be seen from any of the roads or multi-use paths.

The transportation component of the Project occurs solely on existing roadways, including: CA-203, U.S. 395, CA 167, State Rte. 359 and U.S. 95.

10. Other public agencies whose approval is required:

No other public agency approvals are required. The proposed Project is compliant with the District's Wastewater Discharge Requirements promulgated by the State of California Lahontan Regional Water Quality Control Board.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- Aesthetics
- Biological Resources
- Greenhouse Gas Emissions
- Land Use / Planning
- Population / Housing
- Transportation/Traffic
- Mandatory Findings of Significance
- Agriculture and Forestry Resources
- Cultural Resources
- Hazards & Hazardous Materials
- Mineral Resources
- Public Services
- Tribal Cultural Resources
- Air Quality
- Geology /Soils
- Hydrology / Water Quality
- Noise
- Recreation
- Utilities/Service Systems

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Betty Hylton
Signature

3-6-2020
Date

Printed Name and Title: Betty Hylton, Senior Analyst

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Aesthetics:

The District property is located on the eastern edge of the Town of Mammoth Lakes' Urban Growth Boundary. The Town has designated this area as industrial, pursuant to the Town of Mammoth Lakes General Plan. An industrial park is located across Meridian Boulevard to the west. Highway 203 is immediately north of the property and Highway 395 is about 1.5 miles east.

Currently, the District stores the dump truck inside the existing dewatering building. The trailers for the proposed Project are sized to allow the three trailers to be stored inside the dewatering building. When weather permits, one trailer may be stored directly next to the dewatering building. Trailers will only be stored outdoors when empty. If a trailer contains sludge, it will be stored inside of the dewatering building. The outdoor storage location is not visible from any of the properties or roads adjacent to the District's property.

The Project is primarily a route change for hauling sludge. The hauling route occurs solely on existing roadways that already have tractor-trailer use occurring regularly. Upgrades related to the proposed Project occur inside an existing building, and as previously mentioned, trailers are stored in or adjacent to existing buildings. Accordingly, the proposed Project would not substantially impact aesthetic resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects,

	Less Than		
Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

lead agencies may refer to the [California Agricultural Land Evaluation and Site Assessment Model \(1997\)](#) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the [Forest and Range Assessment Project](#) and the [Forest Legacy Assessment project](#); and forest carbon measurement methodology provided in [Forest Protocols](#) adopted by the California Air Resources Board. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Agriculture and Forestry Resources:

The proposed storage of trailers associated with the Project would be solely on District’s property. The property is adjacent to the Inyo National Forest, however, the property has not been identified by the Town of Mammoth Lakes as subject to the Williamson Act and is industrial in nature. The transportation route occurs solely on existing roadways. The Project does not disturb any undeveloped land, conflict with zoning, or convert land to a different land use. Therefore, the proposed Project will have no impact on agricultural and forest resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>III. AIR QUALITY.</u> Where available, the significance criteria established by the applicable <u>air quality management or air pollution control district</u> may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Air Quality:

The Great Basin Unified Air Pollution Control District (GBUAPCD) and the California Air Resources Board govern air quality issues for the Project location. In addition, The Town of Mammoth Lakes (TOML) has an Air Quality Management Plan prepared for the PM10 State Implementation Plan. The proposed Project’s only modification to the wastewater treatment plant process is upgrading the dewatering system with a screw press. This upgrade would not generate new PM10 particles or any criteria pollutant from the wastewater treatment plant. Moreover, because the Project’s treatment process will remain predominantly unchanged, it would not result in any increase in volatile compound emissions or

odors from existing conditions. Trailers will only be stored outdoors when empty. If a trailer contains sludge, it will be stored inside of the dewatering building until being hauled to prevent production of additional odors.

One mile of the proposed Project’s sludge hauling route occurs within the TOML, and there is no increase of mileage traveled within the TOML boundary when compared to the current sludge hauling operation. Accordingly, the proposed Project does not affect the traffic volume limits identified in the TOML Air Quality Management Plan (TOML, 2013).

The additional VMT required by the proposed Project results in increased emissions from diesel truck(s). Discussion regarding emissions as a result of the proposed Project is included under the Part VII, Greenhouse Gas Emissions analysis. The primary source of air pollutants identified in the GBUAPCD Air Quality Monitoring Network Plan are wind-blown dust from dry lakebeds, wood smoke and road cinders. Accordingly, the proposed Project will not result in the production of significant pollutants or significantly impact air quality.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES:				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the <u>California Department of Fish and Game</u> or <u>U.S. Fish and Wildlife Service</u> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the <u>California Department of Fish and Game</u> or <u>US Fish and Wildlife Service</u> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by <u>Section 404 of the Clean Water Act</u> (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted <u>Habitat Conservation Plan, Natural Community Conservation Plan</u> , or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Biological Resources:

Special-status species include plants or animals that are listed as threatened or endangered under the federal and/or California Endangered Species Act, species identified by the California Department of Fish and Wildlife as a California Species of Special Concern, are either rare, threatened, or endangered.

Operational changes due to the proposed Project do not cause disturbance on any undisturbed land. The screw press upgrade occurs within an existing building, trailer storage is within an existing building or directly adjacent to the building on an existing paved surface, and all travel occurs on established, well-traveled roads. Because the Project’s operations would not affect any listed species or their habitats, the proposed Project will not substantially impact biological resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>V. CULTURAL RESOURCES.</u> Would the project:				
a) Cause a substantial adverse change in the significance of a <u>historical resource</u> as defined in <u>§ 15064.5</u> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to <u>§ 15064.5</u> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cultural Resources:

No historical or cultural resources have been identified in the Town of Mammoth Lakes Urban Growth Boundary, which includes the District property (TOML, 2007). Because the proposed Project would utilize the currently existing wastewater treatment location adjacent to District facilities for treatment, it would not provide additional disturbance on any undeveloped land and soils than currently exists. Therefore, the proposed Project would not impact cultural resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>VI. GEOLOGY AND SOILS.</u> Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to <u>Division of Mines and Geology Special Publication 42.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on <u>expansive soil</u> , as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Geology and Soils:

Bedrock of the Mammoth Lakes Basin comprises Paleozoic meta-sediments, Mesozoic metavolcanics, and Cretaceous granitic rocks. These rocks are well exposed on the steep southern border of the watershed and are a part of the backbone or batholith of the Sierra Nevada. The basement rocks slope steeply north and are presumed to underlie the younger sediments of the caldera formed Mammoth Basin at depths greater than 500 feet.

The proposed Project would not expose people to risks greater than currently existing ambient conditions from seismic events. The proposed Project would utilize the existing wastewater treatment plant. Operational changes due to the proposed Project do not cause disturbance on any undisturbed land. The screw press upgrade occurs within an existing building, trailer storage is within an existing building or directly adjacent to the building on already paved surface and all travel occurs on established, well-traveled roads. Project operations would not affect the District property’s existing geologic environment, and likewise the District property’s existing geologic environment would not affect Project operations. Therefore, the proposed Project would not substantially impact geology and soil resources.

<u>VII. GREENHOUSE GAS EMISSIONS.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or <u>regulation</u> adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Greenhouse Gas Emissions:

The baseline against which to compare potential impacts of the Project includes the natural and anthropogenic drivers of global climate change, including worldwide greenhouse gas (GHG) emissions from human activity. The District is located within the Town of Mammoth Lakes (TOML), Mono County. TOML does not have its own GHG plan or policy. Accordingly, the impact analysis for the proposed Project relies on guidelines, analyses, policy, and plans for reducing GHG emissions established by the California Air Resources Board (CARB).

Additionally, the Great Basin Unified Air Pollution Control District (GBUAPCD), a regional government agency that serves Alpine, Mono, and Inyo Counties which enforces federal, state, and local air quality regulations, does not have established CEQA thresholds of significance for GHG emissions. Consequently, GBUAPCD recommends using Mojave Desert Air Quality Management District’s

(MDAQMC) CEQA and Federal Conformity Guidelines. These guidelines were used to determine thresholds of significance for this Project.

Table 1 – Significant Emissions Thresholds – (MDAQMC, 2020, p. 9)

Criteria Pollutant	Annual Threshold (short tons)	Daily Threshold (pounds)
Greenhouse Gases (CO ₂ e)	100,000	548,000
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO _x)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO _x)	25	137
Particulate Matter (PM ₁₀)	15	82
Particulate Matter (PM _{2.5})	12	65
Hydrogen Sulfide (H ₂ S)	10	54
Lead (Pb)	0.6	3

The Project proposes to cease hauling sludge to the Benton Crossing Landfill located at 899 Pit Rd, Crowley Lake, California and start hauling sludge to the next closest landfill which will accept sludge produced from the District, Russell Pass Landfill, 17.2 miles south of Fallon, Nevada. The round-trip mileage from the District to Benton Crossing Landfill is 26.6 miles. The round-trip mileage from the District to Russell Pass Landfill is 288 miles. Vehicle miles traveled (VMT) per sludge hauling trip would increase by 261.4 miles under the Project. Two measures are being implemented to reduce the number of VMT annually as a result of the proposed Project, detailed below:

1. Increase capacity and efficiency of hauling trailer:

The District currently utilizes a 13-ton capacity dump truck to haul and dispose of sludge at the Benton Crossing Landfill. For the proposed Project, the District would utilize three 24-ton capacity trailers. Operating with three trailers would afford the District sludge storage, including when loads are transported to the Russell Pass Landfill and avoid interfering in District operations. In contrast, the District’s current sludge hauling operations do not allow for storage when the dump truck is hauling the sludge. Access to sludge storage ensures that every hauling trip is maximized by only hauling trailers that are filled to capacity.

The additional hauling capacity in each trailer would decrease the number of hauling trips required. Currently, the average VMT annually to dispose of sludge is 6,277 miles, with the 13-ton capacity dump truck making, on average, 236 trips annually at a distance of 26.6 miles roundtrip. If the District continued to utilize the 13-ton capacity dump truck, the round-trip distance to Russell Pass Landfill (288 miles) would increase the VMT annually to dispose of sludge to 67,968 miles. Increased trailer capacity would significantly decrease the number of trips by almost half, to an average of 122 trips annually or 35,136 VMT annually.

2. Increase solids content in sludge to reduce weight:

Currently, the District utilizes a BDP that produces sludge with an average of 15% solids content (dryness by weight), with water content to make up the remaining 85%. In 2019, the District completed a pilot study utilizing a screw press to increase the solids content of the sludge (Patel, 2019). The pilot study found that the screw press produces, on average, 24.7% solids content. Increased solids content reduces the water in sludge and overall tonnage required to be hauled.

On average, the District’s wastewater treatment plant produces 439 tons of solids annually. The currently implemented BDP technology results in the District hauling a total of 2,926 tons of sludge annually. Upgrading to a screw press would reduce the tonnage of sludge hauled by increasing the solids content which reduces the water to solids ratio in the sludge, thus reducing the weight and volume of sludge produced. Specifically, increased solids content to 24.7% as a result of the screw press, reduces sludge hauled, on average, to 1,777 tons annually. The reduction in tonnage hauled to 1,777 reduces the number of trips (with utilization of the larger capacity trailers) to 74 trips annually for an average of 21,324 VMT annually.

As described above, and with the implementation of these mitigation measures, the proposed Project would result in an increase, on average, of 21,324 VMT annually. Diesel engines mainly emit four pollutants: carbon dioxide (CO₂), carbon monoxide (CO), particulate matter (PM), and oxides of nitrogen (NO_x). Currently, the District-owned dump truck manufactured in 2006 is classified as a medium-heavy duty diesel instate construction truck. With a gross vehicle weight rating of more than 26,000 pounds, the dump truck travels 6,277 miles and emits an average of 7.15 tons of CO₂, .013 tons of CO, .003 tons of PM₁₀, and .043 tons of NO_x annually.

The proposed Project would utilize a T7 heavy-heavy duty diesel tractor to haul the 24-ton capacity trailers. This increase in VMT to 21,324—would produce an average of 32.47 tons of CO₂, .004 tons of CO, .0014 tons of PM₁₀, and .085 tons of NO_x annually. Consequently, the proposed Project would result in an increase of 25.32 tons of CO₂, and 0.04 tons of NO_x annually, but would actually result in a decrease of PM₁₀ particulates and CO. Emissions calculations were completed utilizing the California Air Resource Board’s Mobile Source Emissions Inventory - Modeling Tools.

Table 2 – Summary of Proposed Project’s Emissions

Criteria Pollutant	CO ₂	CO	PM ₁₀	NO _x
Current Operations Annual Emissions*	7.154	0.013	0.003	0.043
Proposed Project Annual Emissions*	32.476	0.004	0.001	0.085
Annual Gain in Emissions from Project*	25.322	-0.009	-0.002	0.042
MDAQMD Annual Significant Emissions Threshold	100,000	100	15	25

*Average calculated utilizing District sludge disposal tonnage from 2015-2019

Per the MDAQMC thresholds in Table 1 above, none of the pollutants that would be generated by the Project exceed the significance thresholds that would establish a significant impact.

The District would additionally require that tractors utilized for the proposed Project comply with CARB heavy-duty diesel vehicle regulations. Accordingly, the proposed Project would also not interfere with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.

Utilizing the above mitigation measures, although the proposed Project results in an increase in VMT, it would not exceed the significance thresholds established by MDAQMD, or interfere with any other applicable plan, policy, or regulation, and therefore would not result in a substantial impact on GHG emissions.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>VIII. HAZARDS AND HAZARDOUS MATERIALS.</u>				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section <u>65962.5</u> and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hazards and Hazardous Materials:

In accordance with title 40, part 503 of The Code of Federal Regulation sludge produced by the District is considered non-hazardous. The proposed Project does not require the use of, cause the emission of, or expose the public to any hazardous materials. Therefore, the proposed Project would not have a substantial impact on hazardous materials.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>IX. HYDROLOGY AND WATER QUALITY.</u> Would the project:				
a) Violate any <u>water quality standards or waste discharge requirements</u> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete <u>groundwater</u> supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a <u>federal Flood Hazard Boundary</u> or <u>Flood Insurance Rate Map</u> or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hydrology and Water Quality:

The proposed Project would not modify the discharge of effluent from the District’s wastewater treatment plant. Additionally, it would not contribute to a violation of water quality standards because no discharge of hazardous materials or runoff would occur as a result of the Project. The Project does not require the use of additional water to be completed. As a result, there will be no impact to groundwater depletion, runoff, or water quality. There are no identified flood hazards or risks of seiche, tsunami, or mudflows in vicinity of the Project location. Accordingly, the proposed Project would not result in a substantial impact to hydrology and water quality.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>X. LAND USE AND PLANNING.</u> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Land Use and Planning:

Pursuant to Title 17 of the Town of Mammoth Lakes’ Municipal Code and General Plan, the zoning designation for the District property is Public & Quasi-Public and it is designated for industrial use. There

are no residential communities adjacent to the District’s property and no Habitat Conservation or Natural Community Conservation plans have been adopted for the Mammoth Lakes area. All travel occurs on existing roadways. The route change and storage of trailers on District property will have no impact to land use and planning.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XI. MINERAL RESOURCES.</u> Would the project:				
a) Result in the loss of availability of a known <u>mineral resource</u> that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Mineral Resources:

No mineral resources have been identified in the Project location; therefore no impacts to mineral resources would result from Project approval.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XII. NOISE</u> -- Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or working in the project area to excessive noise levels?				
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise:

The proposed Project site for loading the sludge trailer is removed from residential areas, and equipment is only deployed during normal business hours. The new travel route is on existing roadways. The amount of sludge loaded will not increase. The proposed Project does not result in the addition of any noise; therefore, there is no impact.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XIII. POPULATION AND HOUSING.</u> Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Population and Housing:

The proposed Project does not contemplate constructing new residential or commercial structures, or displacing existing housing, and is not anticipated to induce population growth. The Project would be carried out on an already-utilized portion of the District property and existing roadways. Therefore, approval of the proposed Project will have no impacts on population and housing.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Public Services:

The Project would not create a need for additional public services, as it likely would not impact any currently existing public services or induce population growth such that those services would be affected. Accordingly, the proposed Project would not impact public services.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Recreation:

The Project would not increase the need or use of recreational facilities. Accordingly, there will be no impact to recreation.

XVI. TRANSPORTATION/TRAFFIC.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Transportation/Traffic:

The Project would not directly impact transportation facilities or traffic circulation or transportation management plans. All travel as a result of the proposed Project would occur on existing, utilized roadways that are approved for tractor trailer travel, including Highway CA203, CA395, NV167, NV359 and NV95. The proposed Project would actually significantly decrease the number of trips locally and would only increase longer-haul trips on the designated highways by approximately ten trips per month. Accordingly, the proposed Project would not impact transportation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Tribal Cultural Resources:

The proposed Project is not located on Tribal land, and does not have artifacts that have been potentially identified as a significant tribal cultural resource. The Project will have no impact on Tribal Cultural Resources.

XVIII. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable <u>Regional Water Quality Control Board</u> ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with <u>federal, state</u> , and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Utilities and Service Systems:

The proposed Project would not result in expansion of the existing water or wastewater facility. No constriction or expansion of storm water drainage facilities would occur because of the proposed Project. The Project proposes to make an operational change as a solution for sludge disposal from the District's wastewater treatment plant; therefore, no water is required for the Project and there would be no impact on water supplies. This operational change is necessary due to the upcoming closure of the Benton Crossing Landfill. Under the proposed Project, the District's sludge disposal operations would continue to comply with the District's Wastewater Discharge Requirements enforced by the State of California Lahontan Regional Water Quality Control Board, which require recording quantity, disposal, and storage of sludge as well as periodic sampling.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XIX. MANDATORY FINDINGS OF SIGNIFICANCE</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species,				

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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As previously discussed, the proposed Project would primarily be an operational change to the District’s sludge handling and hauling operations as a result of the closing of the currently-utilized Benton Crossing Landfill. The proposed Project would only affect disturbed areas of land located on the District’s property and existing, travelled roadways. The only identified impacts would be increased GHG emissions created due to an addition in VMT. However, this impact would be mitigated with a larger capacity hauling trailer and increased solids content in District’s sludge to less-than-significant levels as established by the MDAQMC CEQA and Federal Conformity Guidelines significance thresholds.

Accordingly, because the proposed Project as described above would not result in effects on any other environmental resources considering the implementation of the above mitigation measures, the Project would not result in a significant impact to the environment, either directly, indirectly, or cumulatively.

References

2013. Air Quality Management Plan for the Town of Mammoth Lakes – 2013, Draft Update. Prepared for OM – 10 State Implementation Plan

2007. Town of Mammoth Lakes (TOML). Town of Mammoth Lakes 2005 General Plan Update, SCH No. 200304215

2020. Mojave Desert Air Quality Management District: California Environmental Quality Act and Federal Conformity Guidelines

2019. Patel, Rik. Report on Piloting of the PWTech Volute Dewatering Press at the Mammoth Community Water District WWTP



**COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT
PLANNING DIVISION**

P.O. Box 1609, Mammoth Lakes, CA 93546
Phone: (760) 965-3630 Fax: (760) 934-8608
www.townofmammothlakes.ca.gov

March 27, 2020

Mammoth Community Water District
Attn: Betty Hylton
PO Box 597
Mammoth Lakes, CA 93546

Dear Ms. Hylton:

Thank you for the opportunity to comment on the MCWD Sludge Hauling Operations MND. The Town of Mammoth Lakes recognizes the need to update the MCWD sludge hauling operations due to the expected closure of Benton Crossing Landfill. Staff has considered the Mitigated Negative Declaration for the proposed project and has the following comment:

- The MND proposes the implementation of a screw press to reduce the water content in the sludge. Please identify how the excess water that has been removed from the sludge will be managed.

We appreciate your consideration of these comments. Please contact Gina Montecallos, Assistant Planner (gmontecallos@townofmammothlakes.ca.gov), if you have any questions regarding these comments.

Sincerely,

Gina Montecallos, Assistant Planner
CC: Sandra Moberly, Community & Economic Development Director
Town of Mammoth Lakes



April 01, 2020

Town of Mammoth Lakes
PO Box 1609
Mammoth Lakes CA 93546

Attn: Gina Montecallo, Assistant Planner

Re: **Response to Comment on Mitigated Negative Declaration regarding MCWD Sludge Hauling Operations**

Dear Ms. Montecallo,

On March 27, 2020, the comment below was received regarding a Mitigated Negative Declaration prepared by the Mammoth Community Water District (MCWD) regarding changes to MCWD Sludge Hauling Operations.

Comment Received:

The MND proposes the implementation of a screw press to reduce the water content in the sludge. Please identify how the excess water that has been removed from the sludge will be managed.

MCWD Response:

Excess water that is removed from the sludge as a result of upgrading to a screw press will be returned to the head of the wastewater treatment plant. Similar to the water that is removed from the sludge utilizing the current belt dewatering press, all water removed from sludge is sent back to the head of the wastewater treatment plant where it starts the treatment process from the beginning.

If you have any questions, please contact me.

Sincerely,

Betty Hylton
Senior Analyst

Enclosures (1)



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CC: Sandra Moberly, Community & Economic Development Director
Town of Mammoth Lakes