

INITIAL STUDY MAMMOTH COMMUNITY WATER DISTRICT P.O. Box 597, Mammoth Lakes, CA 93546 Phone: (760) 934-2596; Fax (760) 934-4080

1. Project Title: Arsenic removal at Mammoth Community Water District Groundwater Treatment Plants #1 and #2 to meet the new federal drinking water standard

2. Description of Project:

The Mammoth Community Water District (District) is proposing to begin removing naturally occurring arsenic from potable water supplies to meet the new federal drinking water standard. As of January 23, 2006, all water suppliers will be held to a higher standard for arsenic, which is being lowered from the current limit of 50 ppb (parts per billon) to 10 ppb. While this is a federal maximum contaminant level, or MCL, the California Department of Health Serivces is administering the regulatory process.

The District is proposing to remove arsenic at both of its existing groundwater treatment plants. A conventional iron and manganese removal process that includes chlorination and filtration will be utilized, which is already in place at both treatment plants. A new chemical feed system will be used to introduce ferric chloride, or iron, to the untreated well water, which will combine with the arsenic and be removed using existing filters prior to the water entering the distribution system. Arsenic will be disposed of into the existing sewer collection system with the iron and manganese that is currently removed and disposed of.

During the summer and fall of 2005, the District conducted pilot studies of the ferric chloride treatment to ensure that this system will enable the District to meet the new MCL for arsenic. Small-scale pilot studies were initially conducted by diverting a small quantity of water, adding ferric chloride and sodium hypochlorite (chlorine), and sampling the treated water. Full-scale pilot studies are projected for November 2005, which will test ferric chloride treatment on all production wells. Arsenic will be precipitated from the untreated well water as it enters the treatment plant utilizing the ferric chloride treatment and, after filtration, will be delivered to District customers. Water samples will be obtained to ensure that arsenic levels are being reduced to at least 10ppb.

The District has evaluated the potential for arsenic loading in the wastewater treatment solids, or sludge. Currently, no arsenic is detected in the sludge since the dissolved arsenic simply moves through the treatment process with the wastewater and is disposed of at Laurel Pond. With the new proposed treatment process, arsenic

will be discharged into the wastewater collection system as a solid precipitate, will be treated with other wastewater solids, and will be disposed of at the Benton Crossing Landfill. Based on low dosages of ferric chloride required in the pilot studies to remove arsenic, the District does not anticipate that quantities of arsenic in the sludge would be considered a hazardous waste (MacPhee et al. 2001, p. 48). The District will continue to regularly monitor for various constituents in the solids, such as arsenic, to ensure that regulatory limits for such substances will not be exceeded for disposal at the landfill.

Project Sponsor's Name and Address:	Mammoth Community Water District P.O. Box 597 Mammoth Lakes, CA 93546
Contact Person and Phone Number:	Gary Sisson (760) 934-2596 x 238
	Project Sponsor's Name and Address: Contact Person and Phone Number:

5. Project Location:

Mammoth Community Water District Groundwater Treatment Plant #1, located off Old Mammoth Road near the intersection of Old Mammoth Road and Waterford Lane, and Groundwater Treatment Plant #2, located at the corner of Meridian Boulevard and Majestic Pines Drive.

6. Surrounding Land Uses and Setting:

Groundwater Treatment Plant #1

This facility is located adjacent to the Mammoth Lakes Housing, Inc. Aspen Village workforce housing project on Old Mammoth Road that is currently being developed. In addition, single family and multifamily residences are adjacent to the facility to the south and west.

Groundwater Treatment Plant #2

This facility is located across Meridian Boulevard from Summit Condominiums and across Majestic Pines Drive from the Juniper Springs Lodge parking area. Single family residences are also located to the north.

7. General Plan Designation / Zoning

Groundwater Treatment Plant #1

Located on land zoned as Resort and adjacent to a Low Density Residential zoning and a High Density Residential zoning

Groundwater Treatment Plant #2

Located on land zoned as Resort and adjacent to a Low Density Residential zoning and a High Density Residential zoning

(From the 1987 Town of Mammoth Lakes General Plan)

8. Other Agencies Whose Approval is Required:

California Department of Health Services – Amendment to existing water supply permit will be required

9. 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.

Land Use and Planning	Transportation	Public Services
Population and	Biological	Utilities and
Housing	Resources	Services
Geological Problems	Energy and Mineral Resources	Aesthetics
Water	Hazards	Cultural Resources
Air Quality	Noise	Recreation

10. Determination

On a basis of this evaluation:

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

Signature

Date

Printed Name

For

Potentially Potentially Less Than Significant No Significant Significant Unless Impact Impact Impact Mitigated 1. LAND USE AND PLANNING. Would the proposal: a) Conflict with general plan designation or zoning? \square \square The proposed project involves modifications to the existing iron and manganese removal equipment located on the interior of the buildings of Groundwater Treatment Plants #1 and #2. These Treatment Plants are located on land zoned as Resort by the Town of Mammoth Lakes 1987 General Plan. The proposed project is among the uses permitted in the Resort land use category. b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? This project is subject to the approval of the California Department of Health (DHS) and will adhere to current DHS standards. c) Be incompatible with existing land uses in the vicinity? \square Land uses in the areas surrounding the both groundwater treatment plants include Resort, Low Density Residential, and High Density Residential. The proposed project is compatible with the land uses in these areas. d) Affect agricultural resources or operations? \square There are no agricultural resources near the proposed project. e) Disrupt or divide the physical arrangement of an established community? \square \square The proposed project involves minor modification to equipment on the interior of existing District water treatment buildings. The modification to these structures will not be noticeable on the exterior of the buildings and, thus, will not alter the arrangement of the existing community.

11. ISSUES AND SUPPORTING INFORMATION:

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
2. POPULATION AND HOUSIN	G. Would the	proposal:		
a) Cumulatively exceed official reg	ional or local point \Box	opulation proje	ctions?	
b) Induce substantial growth in an a	area?			•
a) and b) The proposed project will enable the District to meet the new federal drinking water standard of arsenic. The purpose of revising the standard from the 50ppb to the new standard 10 ppb, effective January 23, 2006, is to reduce the public health risks from naturally occurring arsenic in drinking water. The project has no potential of impacting population projections or inducing growth.				
c) Displace existing housing, espec	ially affordable □	housing?		
The proposed project involves modification to the interior structures of the District's groundwater treatment plants and, thus, will not affect housing in the vicinity. The Mammoth Lakes Housing's Aspen Creek affordable housing development is located adjacent to Groundwater Treatment Plant #2 and will be utilizing the access road to the Plant as an emergency fire access road. Vehicle traffic to the plant during project construction will not affect the use of this road as an emergency access.				
3. GEOLOGIC PROBLEMS. Is	there a potentia	l for:		
a) Fault Rupture?				•
b) Seismic ground snaking?				
a) and b) As noted in the Town of Mammoth Lakes General Plan, (Town, 1987, p. 201-202) the Mammoth Lakes area has a long history of seismic activity and six known active faults are located in the region. Alquist-Priolo Fault Zoning Act prohibits the location of most structures for human occupancy across active faults to mitigate the hazards associated with fault rupture. However, none of the proposed project elements are located in a designated Alquist-Priolo study zone, nor would the proposed project precipitate seismic events. Project structures and employees would likely be exposed to seismic activity over the life of the project, but these potential effects would be no greater than the risk currently experienced in the vicinity of the project.				

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact	
c) Seismic ground failure, including	liquefaction?	0			
e) Landslides or mudflows?			_		
g) Subsidence of the land?			_	_	
c), e), and g) The proposed project is located within existing structures that have previously been evaluated for geologic hazards. No geologic hazards are anticipated to occur as a result of the proposed project construction.					
d) Seiche, tsunami or volcanic hazar	rd? □			•	
The proposed project is not located adjacent to large water bodies capable of generating tsunamis or seiches, and no impacts are anticipated with respect to these hazards. Although the region has experienced volcanic activity for an estimated 3.2 million years (Town, 1987, p. 197), it is not anticipated that the physical structures associated with the proposed project would contribute to the probability of volcanic activity. Project structures and employees may be exposed to volcanic activity over the life of the project, but these potential effects would be sufficiently mitigated through compliance with implementation of identified emergency response actions.					
f) Erosion, changes in topography, or fill?	or unstable so	il conditions fr	om excavatio	n, grading	
				-	
h) Expansive soils?				-	
i) Unique geologic or physical featu	res? □				
f), g), and h) No grading and excavation activities are anticipated as part of the proposed project. The proposed project will utilize Best Management Practices to ensure that any possible erosion would be minimized.					

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
4. WATER. Would the project resu	lt in:			
a) Changes in absorption rates, dr runoff?	rainage pattern	s, or the rate	and amount	of surface
The proposed project will not alter plants on the surface of the land an runoff.	r the existing f d, thus, will no	ootprint of the alter absorption	e groundwater ion, drainage,	treatment or surface
b) Exposure of people or property to	\square water related	hazards such as	s flooding? \Box	
The proposed project will have n Treatment Plant #1 is located near 1 100-year floodplain. (Town, April 2	o impact on p Mammoth Cree 2005 Draft Gen	otential flood k, but is not wi heral Plan, p. Cl	hazards. Gr ithin the existi HS 3).	oundwater ing FEMA
c) Discharge into surface waters or o	other alteration \Box	of surface wate	er quality? □	
d) Changes in the amount of surface	e water in any v □	vater body?		•
e) Changes in currents or the course	or direction of \Box	water moveme	ents?	
c), d), and e) The proposed progroundwater treatment facilities and quality.	oject will invo d will not alter	olve minor mo or impair surf	odifications to face water mo	o existing vement or

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
f) Change in the quantity of ground or through interception of an aquife	water, either th	rough direct a	dditions or wi	thdrawals,
groundwater recharge capability?				
g) Altered direction or rate of flow of	of groundwater	?		•
h) Impacts to groundwater quality?				
f), g), and h) The proposed project involves the modification to the groundwater treatment process, but will not involve any changes to amount of groundwater pumped. All production wells that feed water to the groundwater treatment plants have been previously constructed with an annular seal to prevent surface water contamination or movement of shallow ground water to deeper, higher quality groundwater. In addition, the logic control systems at the groundwater treatment plants will be modified to reduce the number of backwash cycles, which will reduce the amount of water used for the treatment process.				
i) Substantial reduction in the am water supplies?	ount of ground	dwater otherw	ise available ∷	for public
The treatment process of the water modification to groundwater involve not alter the amount of water curren	er currently ex ed in the propo tly extracted fro	stracted from used project. T om the aquifer.	the aquifer is he proposed p	the only roject will
5. AIR QUALITY. Would the prop	osal:	4		· · · · · · · · · · · · · · · · · · ·
violation?	or contribute	to an existing	or projected a	ar quanty
				•
All construction activities will occu Treatment Plant buildings and are no	r within the in ot anticipated to	terior of existing impact air qu	ng District Gro ality.	oundwater

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
b) Expose sensitive receptors to po	ollutants?		_	
d) Create objectionable odors?				•
b) and d). No objectionable of operation of the proposed project.	dors are antici	pated from th	e construction	n phase or
c) Alter air movement, moisture, o	r temperature, o	or cause any ch	ange in climat □	e?
The proposed project will have climate than what is currently bein	no greater imp g experienced i	pact on air mo n the vicinity o	ovement, temp f the project.	perature, or
6. TRANSPORTATION/ CIRCU	ULATION. Wo	ould the propos	al result in:	
a) Increased vehicle trips or traffic	congestion?			
During construction phase of the proposed project, there may be a slight increase in construction-related traffic near the groundwater treatment plants. Following construction, traffic in and around the District site would return to current levels.				
b) Hazards to safety from design for	eatures or incor	npatible uses?		
There would be no design feature project. Best Management Pract Chloride. The existing safety equi meets industry standards.	es or incompat tices will be u tipment present	ible uses assoc sed when han at both Grour	ciated with the dling and sto adwater Treatr	e proposed ring Ferric nent Plants
c) Inadequate emergency access or	\square access to near	oy uses? □		
The proposed project will not influ- on the Town of Mammoth Lak affordable housing project anticip Plant #2 as an emergency fire roa road for emergency uses.	uence existing tes emergency pates using the d. The propose	emergency pro evacuation pl access road to ed project will	cedures, which lan. The As Groundwater not affect the	h are based pen Creek Treatment use of this

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
d) Insufficient parking capacity on-s	site or off-site? \Box			
The proposed project will not ine Treatment Plant.	crease the need	d for parking	at either Gro	oundwater
e) Hazards or barriers for pedestrian	ns or bicyclists? □			
f) Conflicts with adopted policies su	ipporting altern	ative transport	ation?	•
g) Rail, waterborne or air traffic imp	pacts?			
e), f), and g) The proposed prostructures located on the inside of the pedestrians, bicyclists, and alternation. The area is not served by waterborn	oject involves in ne Groundwater ve transportatio e or rail transpo	modifications Treatment Plan are not anticipation.	to the water in buildings.	treatment Impacts to
7. BIOLOGICAL RESOURCES.	Would the prop	osal result in i	mpacts to:	
a) Endangered, threatened or rare sp	becies or their has \Box	abitats?		_
b) Locally designated species?				
c) Locally designated natural comm	unities?			-
e) Wildlife dispersal or migration co	orridors?			-
a), b), c), and e) The proposed pr structures and, thus, is not anticipat arsenic will occur in the existing se manganese, which is currently dispo	roject construct ted to impact bi ewer collection osed of as such.	ion will be co ological resou system in cor	ontained withi rces. Waste c nbination with	n existing lisposal of h iron and

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
d) Wetland habitat?				
There is no wetland habitat near eith	ner Groundwate	er Treatment Pl	ant.	-
8. ENERGY AND MINERAL RE	SOURCES. W	ould the property	osal:	
a) Conflict with adopted energy con	servation plans	\$? □		•
The chemical feed equipment that will be used as part of the proposed project will consume minimal amounts of energy. In order to save energy, the logic control systems will be modified to reduce the number of backwashes required to clean the filter media of iron, manganese, and arsenic.				
b) Use non-renewable resources in a	a wasteful and i	inefficient man	ner?	
The principal project objective is to benefit community health by reducing the amount of naturally occurring arsenic in the drinking water supplies. The project does not propose to utilize any additional groundwater resources beyond what is currently being used in the treatment of groundwater.				
c) Result in the loss of availability value to the region and the residents	of a known m of the State? \Box		that would be	e of future
The <u>Town of Mammoth Lakes Ge</u> mineral resource.	<u>eneral Plan</u> do	es not designa	te and areas	of known

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
9. HAZARDS. Would the proposa	l involve:	0		
a) A risk of accidental explosion or	release of haza	rdous substanc	es?	
c) The creation of any health hazard	\Box or potential ne	\square	-	
d) Exposure of people to existing so	Sources of potent \Box	ial health haza	rds?	
a), c), and d) The only potential health risks from the proposed project are associated with the presence of ferric chloride at the Groundwater Treatment Plants. Best Management Practices will be used in handling and storing ferric chloride. Ferric chloride will be stored in a secondary containment unit, which will prevent any leakage outside of the treatment plants in the event of a spill or leak. Project construction activities are not anticipated to create any health hazard. Due to the extremely small quantities of arsenic being removed from groundwater, quantities of arsenic in the wastewater treatment solids, or sludge, are not anticipated to exceed Lahontan Regional Water Quality Control Board regulations.				viated with anagement de will be ide of the bundwater, acipated to
b) Possible interference with an em		se plan or emer		tion plan?
The proposed project does not pose evacuation plans established by the	e any interference District or the '	ce with existing Town of Mam	g emergency re noth Lakes.	esponse or
e) Increase fire hazard in areas with	n flammable bru □	sh, grass, or tre \Box	ees? □	
Ferric chloride is not considered a fire hazard. All construction activities will be occurring inside existing structures and are not anticipated to increase fire hazards. (MSDS <u>http://www.jtbaker.com/msds/englishhtml/f1060.htm</u>)				
10. NOISE				
a) Increases in existing noise levels	?			-
b) Exposure of People to severe not	ise levels? \Box			-
a) and b) The chemical feed pump project produce virtually no noise. occur inside an already existing stru	o systems that v Construction a acture.	vill be utilized activity noise v	as part of the vill be minima	proposed and will

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
11. PUBLIC SERVICES. Would	the proposal ha	ave an effect u	pon, or result	in a need
for new or altered government servi	ces in any of th	e following are	eas:	
a) Fire Protection?				
c) Schools?			_	_
a) and c) The Mammoth Lakes Fire Protection District provides fire protection services for facilities located in the Town of Mammoth Lakes. It is not anticipated that either construction activities associated with installing the chemical feed equipment or implementation of the arsenic removal project itself will place any demand for fire protection. The project would place no demand on school facilities since it does not generate user populations.				
b) Police Protection?				
d) Maintananaa of nublic facilities	in aludina na da			
d) Maintenance of public facilities,				
e) Other governmental services?	_			_
b), d), and e) As a self-governing public agency, the District is responsible for the maintenance of its facilities; the use of non-District public agencies is limited. Where appropriate, the District and Town Council work together to coordinate overlapping regulatory activities. The District rarely requires service from the police department, and the proposed project is not expected to result in additional security assistance. The impact of the proposed project on police and governmental services would not be significant.				
12. UTILITIES AND SERVICE S	SYSTEMS			
a) Power of natural gas?				
The only additional energy consumption that would result from the proposed project is from the chemical feed pumps. The electricity required to run these pumps is minimal.				

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
b) Communication systems?				
No additional communication equipment beyond what the District currently utilizes is anticipated as part of the proposed project.				
c) Local or regional water treatment	or distribution			
The proposed project will improve the level of water treatment at the District's groundwater treatment facilities. Distribution facilities will not be impacted by the proposed project.				
d) Sewer or septic tanks?				
There are only a limited number of septic tanks remaining in the MCWD service area and such systems would not be impacted by the proposed project. The proposed project will introduce naturally occurring arsenic into the sewer system in a solid form. As the water-soluble arsenic is bound to iron in the proposed treatment process, a precipitate is formed. This precipitate is removed in the existing iron and manganese filtration system, sent to the sewer collection system as the filters are backwashed, and eventually ends up in the wastewater solids, or sludge. Instead of the current system of sending the soluble arsenic to Laurel Pond with the treated wastewater, this solid arsenic will be removed with the sludge.				
e) Storm water drainage?				
All proposed project construction anticipated to have any impact on sto	would occur orm water drai	inside existin nage.	ng facilities a	and is not

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact	
f) Solid waste disposal?					
The proposed project will result in a small quantity of arsenic accumulating in the solid waste from the wastewater treatment plant. These solids, or sludge, are sent to the Benton Crossing Landfill for disposal. Currently, no arsenic is detected in the sludge. It is not anticipated that loads of arsenic would qualify as hazardous based on the low requirements of ferric chloride required to remove arsenic (MacPhee et al. 2001. p.48). In addition, solids removed from the wastewater treatment process will be regularly tested for arsenic to ensure that standards are not exceeded.					
g) Local or regional water supplies?	?				
The proposed project will enhance the quality of groundwater supplies provided to customers in Town of Mammoth Lakes through reducing the quantities of naturally occurring arsenic. No impacts to the quantities of local water supplies will occur because of the proposed project.					
13. AESTHETICS					
a) Affect a scenic vista or scenic hig	ghway? □			-	
b) Have a demonstrable negative ae	Solution states that \Box				
c) Create light of glare?					
a), b), and c). All project construction will occur within existing structures and, thus, will have no impact on aesthetics or visual resources.					

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact	
14. CULTURAL RESOURCES		0			
a) Disturb paleontological resources	?				
b) Disturb archaeological resources?					
c) Affect historical resources?					
d) Have the potential to cause a physical change, which would affect unique ethnic cultural values?					
e) Restrict existing religious or sacre	\square ed uses within \square	the potential im \Box	□ npact area? □	•	
a), b), c), d), and e) All construction associated with the proposed project will occur within existing structures and has no potential to disrupt cultural resources.					
15. RECREATION					
a) Increase the demand for neighbor facilities?	rhood or region	nal parks or otl	her regional re	creational	
b) Affact avisting regressional oppor	tunitios?				
b) Affect existing recreational oppor					
a) and b) Neither the construction of project facilities or arsenic removal project itself would have any impact on parks, recreational facilities, or recreational opportunities. No part of the proposed project would increase the demand for recreation since the project does not induce growth in the Mammoth Lakes area.					

	Potentially Significan Impact	y Potentiall y Significar t Unless Mitigated	y Less Tha nt Significar Impact	n No nt Impact
16. MANDATORY FINDINGS OF	SIGNIFIC	CANCE		
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species. 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 the potential to achieve short-term, to the disadvantage of long-term, environmental goals?				
c) Does the project have impacts considerable?	that are	individually	limited, but □	cumulatively
d) Does the project have environmental effects that will cause substantial adverse effects				
on human beings, either directly or in	directly?			

EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D).

The following earlier analyses were used to make the above determinations. These reports are available for review at the MCWD District offices.

- Town of Mammoth Lakes. General Plan. October 1987.
- Town of Mammoth Lakes. Draft General Plan. April 2005
- MacPhee, M.J., Charles, G.E., and Cornwell, D.A. Treatment of Arsenic Residuals from Drinking Water Removal Processes. June 2001.

Websites

• Material Safety Data Sheet for ferric chloride.

http://www.jtbaker.com/msds/englishhtml/f1060.htm