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## Lahontan Regional Water Quality Control Board

July 30, 2021

File: Environmental Doc Review  
Mono County

Governor's Office of Planning & Research

**July 30 2021**

**STATE CLEARINGHOUSE**

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### **Comments on the Draft Environmental Impact Report for Mammoth Yosemite Airport Terminal Area Development Project, Mono County, State Clearinghouse No. 2019100384**

Lahontan Regional Water Quality Control Board (Water Board) staff received the Draft Environmental Impact Report (DEIR) for the above-referenced Project (Project) on June 14, 2021. The DEIR was prepared by Basecamp Environmental, Inc. (Consultant) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We thank the Town of Mammoth Lakes for providing Water Board staff the opportunity to review and comment on the DEIR. Based on our review, we recommend the following: (1) there is sufficient evidence to indicate that the proposed Project will result in significant impacts to water quality, we request that the level of significance for water quality impacts be changed to significant and that appropriate mitigation measures be identified that, when implemented, will reduce or avoid these impacts; (2) identify an appropriate combination of sediment and erosion control best management practices (BMPs) and/or other BMPs that will be implemented as a mitigation for potential impacts to water quality, soil erosion, and hazardous material management; and (3) incorporate design alternatives that are compatible with low impact development (LID). Our comments are outlined below.

#### **WATER BOARD'S AUTHORITY**

All groundwater and surface waters are considered waters of the State. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the United States. The Federal Clean Water Act (CWA)

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PETER C. PUMPHREY, CHAIR | MICHAEL R. PLAZIAK, EXECUTIVE OFFICER

provides additional protection for those waters of the State that are also waters of the United States.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at [http://www.waterboards.ca.gov/lahontan/water\\_issues/programs/basin\\_plan/references.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml).

## **SPECIFIC COMMENTS**

We recommend the following be considered in the environmental review.

1. **Impact Hydro-2: Groundwater Resource and Quality:** Water Board staff respectfully disagree with the assessment of "less than significant impact" due to the failure to identify the water quality standards that could potentially be violated by the Project. Groundwater at the airport is very shallow and the airport harbors many substances that can contaminate groundwater through spills even if they are stored on concrete surfaces. Additionally, the leach field has the ability to contaminate groundwater in the area due to the build up of nitrate and other nutrients being flushed out of the soil by stormwater and snow melt. Water Board staff recommend that the level of significance be changed to significant and then list the appropriate mitigation measures that will be taken to reduce or avoid these impacts.
2. **Impact Hydro-1: Surface Water Resources and Quality:** The DEIR should identify an appropriate combination of sediment and erosion control BMPs and/or other BMPs that will be implemented as mitigation for potential impacts to water quality.
3. **Impact Geo-4 Soil Erosion:** The DEIR should identify an appropriate combination of sediment and erosion control BMPs and/or other BMPs that will be implemented as mitigation for potential impacts to water quality as a result of soil erosion.
4. **Impact Haz-1: Hazardous Material Transportation, Storage, and Disposal:** The DEIR should identify an appropriate combination of sediment and erosion control BMPs and/or other BMPs that will be implemented as mitigation for potential impacts related to hazardous material management.
5. In general, the increase in impervious surfaces for these types of projects has the potential to hydrologically modify natural drainage systems. Of particular concern is the collection of onsite storm water runoff and the concentrated discharge of

that storm water to natural drainage channels. Design alternatives that are compatible with low impact development (LID) should be considered. LID components include: maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge; managing runoff as close to the source as possible; and maintaining vegetated areas for storm water management and onsite infiltration. We recommend natural drainage channels and flow paths be maintained through the Project site to avoid no net loss of function and value of waters of the state as a result of Project implementation.

## **PERMITTING REQUIREMENTS FOR INDIVIDUAL PROJECTS**

A number of activities associated with the proposed Project may have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

1. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.
2. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.
3. Depending on the Standard Industrial Classification (SIC) code for industrial-type activities at a specific site, individual projects may require an NPDES General Industrial Storm Water Permit, WQO-2014-0057-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.

We request that the draft DEIR recognize the potential permits that may be required for the Project, as outlined above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document. Information regarding these permits, including application forms, can be downloaded from our website at <http://www.waterboards.ca.gov/lahontan/>. Early consultation with Water Board staff regarding potential permitting is recommended.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760) 241-7305, [tiffany.steinert@waterboards.ca.gov](mailto:tiffany.steinert@waterboards.ca.gov) or Jan Zimmerman, Senior Engineering Geologist,

at (760) 241-7404, [jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov) and be sure to include the State Clearinghouse No. and Project name in the subject line.



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State Clearinghouse ([state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)) SCH No. 2019100384