

# Mammoth Disposal Transfer Station Expansion Project

Initial Study/Mitigated Negative Declaration

Final | June 2021



Submitted to:

**Town of Mammoth Lakes**

Submitted by:

**Michael Baker**  
INTERNATIONAL



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**FINAL  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

**Mammoth Disposal Transfer Station  
Expansion Project**

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**State Clearinghouse No. 2021050146**

**Lead Agency:**



**TOWN OF MAMMOTH LAKES**  
437 Old Mammoth Road, Suite 230  
Mammoth Lakes, California 93546  
**Contact: Ms. Sandra Moberly**  
**Community and Economic Development Director**  
**760.965.3633**  
[smoberly@townofmammothlakes.ca.gov](mailto:smoberly@townofmammothlakes.ca.gov)

**Prepared by:**

**MICHAEL BAKER INTERNATIONAL**  
5 Hutton Centre Drive, Suite 500  
Santa Ana, California 92707  
**Contact: Ms. Kristen Bogue**  
**949.472.3505**

**June 2021**

JN 181877

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## 1.0 INTRODUCTION

The proposed Mammoth Disposal Transfer Station Expansion Project (herein referenced as the “project”) is located within the Town of Mammoth Lakes, in the southwestern portion of Mono County. The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Project approval would require a Use Permit (UPA) for each of the two Sites, a Major Design Review (DR), a Variance (VAR), and CEQA clearance.

In accordance with the California Environmental Quality Act (CEQA) Guidelines, an Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the proposed project.

The IS/MND (State Clearinghouse No. 2021050146) was made available for public review and comment pursuant to CEQA Guidelines Section 15070. The public review commenced on May 10, 2021 and concluded on June 8, 2021. The IS/MND and supporting attachments were available for review by the general public at:

- Town of Mammoth Lakes, Community and Economic Development Department, 437 Old Mammoth Road, Suite 230, Mammoth Lakes, CA 93546
- Town of Mammoth Lakes website: <https://www.townofmammothlakes.ca.gov/1015>
- Mono County Library, 400 Sierra Park Road, Mammoth Lakes, CA 93546



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## 2.0 RESPONSE TO COMMENTS

During the public review period, comments were received on the IS/MND from certain interested public agencies and private parties. The following is a list of the persons, firms, or agencies that submitted comments on the IS/MND during the public review period:

Comment Letter No.	Person, Firm, or Agency	Letter Dated
1	CEQAnet State Clearinghouse and Planning Unit Governor's Office of Planning and Research	June 9, 2021
2	Luke Eisenhardt, Air Quality Specialist Great Basin Unified Air Pollution Control District	May 25, 2021
3	Christine Karl, Environmental Scientist Department of Resources Recycling and Recovery (CalRecycle)	May 28, 2021
4	Jill Kearney, REHS Mono County Health Department	June 8, 2021

Although the CEQA Guidelines do not require a Lead Agency to prepare written responses to comments received (see CEQA Guidelines Section 15088), the Town of Mammoth Lakes has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

# Mammoth Disposal Transfer Station Expansion Project

## Summary

**SCH Number**

2021050146

**Lead Agency**

City of Mammoth Lakes

**Document Title**

Mammoth Disposal Transfer Station Expansion Project

**Document Type**

MND - Mitigated Negative Declaration

**Received**

5/7/2021

**Present Land Use**

Industrial uses (existing Mammoth Disposal Transfer Station, Buy-back/Recycle Center, and fleet maintenance operations).

**Document Description**

The Mammoth Disposal Transfer Station Expansion Project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site.

1-1

**Contact Information**

Kimberly Cooke, Associate Planner

Town of Mammoth Lakes

Lead/Public Agency

P.O. Box 1609 437 Old Mammoth Road, Suite 230  
Mammoth Lakes, CA 93546

Phone : (760) 965-3638

kcooke@townofmammothlakes.ca.gov

## Location

**Coordinates**

37°38'30.04"N 118°56'58.7"W

**Cities**

Mammoth Lakes

**Counties**

Mono

**Regions**

Northern California

**Cross Streets**

Commerce Drive and Meridian Boulevard

**Zip**

93546

**Total Acres**

2.42

**Jobs**

3

**Parcel #**

037-200-049 and 037-200-050

**State Highways**

US-395, SR-203

**Railways**

NA

**Airports**

NA

**Schools**

Multiple

**Waterways**

Mammoth Creek

**Township**

3S

**Range**

27E

**Section**

36

**Base**

MDBM

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**Notice of Completion****Review Period Start**

5/10/2021

**Review Period End**

6/8/2021

**Development Type**

Office (Sq. Ft. 1855, Acres 0.04, Employees 1)

Industrial (Sq. Ft. 9600, Acres 2.38, Employees 2)

1-1  
cont.

**Local Action**

[Site Plan](#)
[Use Permit](#)
[Design Review](#)

**Project Issues**

[Aesthetics](#)
[Agriculture and Forestry Resources](#)
[Air Quality](#)
[Biological Resources](#)
[Cultural Resources](#)
[Cumulative Effects](#)

[Drainage/Absorption](#)
[Energy](#)
[Flood Plain/Flooding](#)
[Geology/Soils](#)
[Greenhouse Gas Emissions](#)
[Growth Inducement](#)

[Hazards & Hazardous Materials](#)
[Hydrology/Water Quality](#)
[Land Use/Planning](#)
[Mandatory Findings of Significance](#)
[Mineral Resources](#)
[Noise](#)

[Population/Housing](#)
[Public Services](#)
[Recreation](#)
[Schools/Universities](#)
[Septic System](#)
[Sewer Capacity](#)
[Solid Waste](#)
[Transportation](#)

[Tribal Cultural Resources](#)
[Utilities/Service Systems](#)
[Vegetation](#)
[Wetland/Riparian](#)
[Wildfire](#)

**Reviewing Agencies**

[California Air Resources Board \(ARB\)](#)
[California Department of Conservation \(DOC\)](#)

[California Department of Fish and Wildlife, Inland Deserts Region 6 \(CDFW\)](#)
[California Department of Parks and Recreation](#)

[California Department of Transportation, District 9 \(DOT\)](#)
[California Department of Water Resources \(DWR\)](#)
[California Highway Patrol \(CHP\)](#)

[California Native American Heritage Commission \(NAHC\)](#)
[California Natural Resources Agency](#)

[California Regional Water Quality Control Board, Lahontan Victorville Region 6 \(RWQCB\)](#)
[Department of Toxic Substances Control](#)

[Office of Historic Preservation](#)
[State Water Resources Control Board, Division of Drinking Water](#)

[California Department of Resources Recycling and Recovery](#)

**Attachments****Draft Environmental Document [Draft IS, NOI\_NOA\_Public notices, OPR Summary Form, Appx,]**

[Appendix A\\_AQGHGE PDF 3089 K](#)
[Appendix B\\_Cultural Resources Report PDF 1535 K](#)

[Appendix C\\_Geotechnical Report PDF 1191 K](#)
[Appendix D\\_Hydrologic Analysis and Data PDF 2221 K](#)

[Appendix E\\_Noise Data PDF 1006 K](#)
[Appendix F\\_Transportation Analysis PDF 1867 K](#)

[Mammoth Transfer Station\\_Public Review Draft ISMND\\_05-10-21 PDF 6530 K](#)
[Mammoth Transfer\\_NOI PDF 168 K](#)

[Mammoth Transfer\\_SCHSummary PDF 195 K](#)

**Notice of Completion [NOC] Transmittal form**

[Mammoth Transfer\\_NOC\\_signed PDF 214 K](#)

**State Comment Letters [Comments from state reviewing agencies]**

[2021050146\\_CalRecycle Comment PDF 97 K](#)

**Disclaimer:** The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at (916) 445-0613. For more information, please visit [OPR's Accessibility Site](#).

1-1  
cont.

## **Response No. 1**

CEQAnet  
State Clearinghouse and Planning Unit  
Governor's Office of Planning and Research  
June 9, 2021

- 1-1 This letter is a summary of the State Clearinghouse CEQAnet database, which can be accessed at <https://ceqanet.opr.ca.gov/2021050146>. Based on this summary, the Draft IS/MND (State Clearinghouse No. 2021050146) was made available for public review from May 10, 2021 through June 8, 2021. One State agency letter was received by the State Clearinghouse; refer to Comment Letter 3 provided by the Department of Resources Recycling and Recovery (CalRecycle). This summary is for information purposes and does not provide specific comment regarding technical information presented in the Draft IS/MND. As such, no further response is necessary.

**From:** Luke Eisenhardt <[leisenhardt@gbuapcd.org](mailto:leisenhardt@gbuapcd.org)>  
**Sent:** Tuesday, May 25, 2021 3:14 PM  
**To:** Kim Cooke <[kcooke@townofmammothlakes.ca.gov](mailto:kcooke@townofmammothlakes.ca.gov)>  
**Cc:** Tom Schaniel <[tschaniel@gbuapcd.org](mailto:tschaniel@gbuapcd.org)>; Phill Kiddoo <[pkiddoo@gbuapcd.org](mailto:pkiddoo@gbuapcd.org)>; Ann Logan <[ann@gbuapcd.org](mailto:ann@gbuapcd.org)>  
**Subject:** GBUAPCD Comment on IS/MND for Mammoth Disposal Transfer Station Expansion Project

**[EXTERNAL EMAIL]**

Hello Kimberly,

I am submitting the following comments on behalf of the Great Basin Unified Air Pollution Control District on the IS/MND for Mammoth Disposal Transfer Station Expansion Project:

- We have no comments on the air quality analysis. | 2-1
- The project proponent must apply for a secondary source permit from the Great Basin Unified Air Pollution Control District for construction of the new transfer station building and new office building. This permit is intended to limit fugitive dust emissions and diesel emissions during construction. | 2-2
- The project proponent must have an asbestos survey conducted by a certified asbestos contractor prior to demolishing the existing office. An asbestos demolition notification and appropriate fee must be submitted to the District at least 10 business days prior to the start of demolition per District Rule 309 - Asbestos Removal and Demolition fees and Rule 1002 - National Emission Standards for Hazardous Air Pollutants: Asbestos. | 2-3

Best,

Luke Eisenhardt  
Air Quality Specialist  
Great Basin Unified Air Pollution Control District  
157 Short Street  
Bishop, California 93514  
[760-872-8211](tel:760-872-8211), ext. 228  
[760-258-9690](tel:760-258-9690), direct  
[760-920-0327](tel:760-920-0327), cell  
[www.gbuapcd.org](http://www.gbuapcd.org)

## **Response No. 2**

Luke Eisenhardt, Air Quality Specialist  
Great Basin Unified Air Pollution Control District  
May 25, 2021

- 2-1 This comment states that the commenter has no concerns related to the air quality analysis, as presented in the Draft IS/MND. As such, no further response is required.
- 2-2 This comment notes that a secondary source permit will be required prior to construction of the project, to minimize fugitive dust emissions and diesel emissions. It should be noted that Section 2.6, *Permits and Approvals*, of the Draft IS/MND noted the requirement for a “Construction Permit” from the Great Basin Unified Air Pollution Control District (GBUAPCD). For clarity, this has been updated to note “Secondary Source Permit” on page 2-16 of the Draft IS/MND and is reflected below and in Section 3.0, *Errata*, of this Final IS/MND.

### **Project Description, Page 2-16, Second Paragraph**

In addition, the following permits/approvals may be required of other agencies:

- Solid Waste Facilities Permit – Mono County Environmental Health Department and CalRecycle;
- NPDES Construction General Permit – Lahontan Regional Water Quality Control Board;
- ~~Construction Permit~~ Secondary Source Permit – Great Basin Unified Air Pollution Control District;
- Connection Permit – Mammoth Community Water District; and
- Fire Protection District Plan Review– Mammoth Lakes Fire Protection District.

- 2-3 As discussed on Draft IS/MND page 4.9-4, first paragraph, the existing structures were constructed after 1990. As such, the potential for existing asbestos-containing materials (ACMs) and lead-based paints (LBPs) in association with building materials is low and impacts in this regard are considered less than significant. Nonetheless, the project Applicant would be required to comply with all existing Federal, State, and local laws and regulations, including the GBUAPCD requirements (i.e., Rule 309 and 1002 regarding asbestos). Adherence to these existing requirements would minimize impacts related to potential risks of upset relating to asbestos.

## California Environmental Protection Agency



**Gavin Newsom**  
California Governor

**Jared Blumenfeld**  
Secretary for Environmental Protection  
**Rachel Machi Wagoner**  
CalRecycle Director

May 28, 2021

Kimberly Cooke, Associate Planner  
Town of Mammoth Lakes  
P.O Box 1609  
Mammoth Lakes, CA 93546  
[kcooke@townofmammothlakes.ca.gov](mailto:kcooke@townofmammothlakes.ca.gov)

**Subject: SCH No. 2021050146** –Initial Study/Mitigated Negative Declaration Mammoth Disposal Transfer Station Expansion – Mono County SWIS No. 26-AA-0013

Dear Ms. Cooke:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

### **PROJECT DESCRIPTION**

The Town of Mammoth Lakes, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Mammoth Disposal Transfer Station Expansion Project (project) is located within the Town of Mammoth Lakes (Town), in the southwestern portion of Mono County. The project site comprises two separate sites at 59 Commerce Drive (1.87 acres; Assessor's Parcel Numbers [APN] 037-200-049 and 037-200-050) and 264 Commerce Drive (0.55 acres; APN 037-200-061). Regional access is provided to the project site via State Route 203 (SR-203), approximately 0.1-mile to the north, and U.S. Route 395, approximately 1.6 miles to the east.

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site.

3-1



The proposed project would allow for:

- Construction of a 9,600-square foot transfer station building;
- Replacement of the guard/attendant shed with a pre-manufactured approximately 200-square foot scale house;
- Installation of truck scales near the proposed scale house;
- Installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house;
- Construction of a new approximately 1,855-square foot office building (and demolition of the existing 1,200-square foot office building);
- Repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site;
- Abandonment of existing underground stormwater management infrastructure and construction of new underground stormwater retention facilities;
- Connection of a new fire sprinkler and liquid propane gas laterals;
- New pavement for site circulation and parking areas and,
- Construction of a 10-foot masonry perimeter wall located at the east, south and west sides of the property.

The expanded transfer station facility would be open from 6:30 a.m. to 9:00 p.m. seven days a week with approximately 25 employees. In total, the project would result in three net new employees, two additional employees staffed at the transfer station and one additional employee staffed at the buy-back/recycling center.

The transfer station would receive only municipal solid waste, construction and demolition debris, and wood waste and green waste debris. The expanded transfer station facility is anticipated to receive an average of 78 tons per day with a peak throughput of 301 tons per day. Under the SWFP, the facility would be permitted to receive up to 500 tons per day. The facility is designed to handle a throughput of up to 543 tons per day and has a storage capacity (floor space) of 144 tons.

Additionally, while the transfer station facility is anticipated to receive an average of 182 vehicle trips per day with a peak of 284 trips per day, it is designed and permitted to process a peak of 400 trips per day.

## **COMMENTS**

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/ND, in addition to the specific location noted.

Comments for the Draft IS/MND are summarized in the table below:

Chapter/Section	Page and Location	Comment
Title 14 CCR Section 17410.1 Solid Waste Removal	2-10	The regulatory timeframe to remove waste for disposal is 48 hours, not the stated 72 hours removal frequency.

3-2

Solid Waste Regulatory Oversight

A new Full Solid Waste Facilities Permit will be required before operations within the above specified parameters can commence. The Mono County Department of Environmental Health is the Local Enforcement Agency (LEA) and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Jill Kearney at (760) 924-1846 to discuss the regulatory requirements for the proposed project.

3-3

**CONCLUSION**

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the ND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

3-4

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at (916) 341-6405 or by e-mail at [Christine.Karl@calrecycle.ca.gov](mailto:Christine.Karl@calrecycle.ca.gov).

Sincerely,

IS/MND Comments  
Mammoth Disposal Transfer Station Expansion  
May 28, 2021  
Page 4 of 4

Christine Karl, Environmental Scientist  
Permitting & Assistance Branch – North Unit  
Waste Permitting, Compliance & Mitigation Division  
CalRecycle

cc: Nevin Yeates, Manager Permitting & Assistance Branch – North Unit  
Jill Kearney, LEA [jkearney@mono.ca.gov](mailto:jkearney@mono.ca.gov)

## **Response No. 3**

Christine Karl, Environmental Scientist  
Department of Resources Recycling and Recovery (CalRecycle)  
May 28, 2021

- 3-1 The commenter provides a brief project description and an introductory paragraph regarding the Draft IS/MND. Refer to Responses to Comments 3-2 through 3-4 for specific responses to comments made in this Letter.
- 3-2 The commenter has clarified that the regulatory timeframe to remove waste for disposal is a 48 hours removal frequency, rather than the stated 72 hours removal frequency. Accordingly, the requested clarification has been made to page 2-10 of the Draft IS/MND and is reflected below and in Section 3.0, *Errata*, of this Final IS/MND.

### **Page 2-10, First Paragraph**

A common wall and door would connect the transfer station building with the office building. The transfer station building would have a maximum building height of 35 feet. The project proposes to protect the transfer station building floor from vectors by closing the building doors at night. Transfer trailers containing municipal solid waste would either be parked in the building overnight or left outside and covered to minimize the propagation or attraction of flies, rodents, or other vectors. All municipal solid waste is removed within ~~72~~48 hours of receipt to minimize odors and vectors as well. Last, the proposed transfer station building would include a misting system to control dust and minimize odors.

### **Page 4.3-8, Response 4.3(d), Second Paragraph**

Operations associated with municipal solid waste handling have the potential to generate detectable odors. The proposed transfer station building would receive municipal solid waste, construction and demolition debris, and wood waste and green waste debris. Waste would be dumped to the tipping floor on-site and then moved directly to large haul trucks for transport. Although the project would be permitted to receive an increased quantity of waste when compared to existing conditions, all municipal solid waste would be removed within ~~72~~48 hours of receipt to minimize odors. Additionally, operations at the proposed transfer station would be contained within the transfer station building and would include a misting system to control dust and minimize odors. Therefore, odors would be reduced when compared to existing conditions as the existing transfer station operations occur outside and are not enclosed within a building. Thus, the project would not result in other emissions (such as those leading to odors) that could adversely affect a substantial number of people. A less than significant impact would occur in this regard.

**Page 4.8-12, Table 4.8-2, Second Row**

Consistent. A solid waste transfer station receives municipal solid waste, then sorts, compacts, and transports such waste to an off-site end point. On-site operations also limit the amount of time solid waste remains at the facility to less than 7248 hours. As such, no decomposition (associated with extended timeframes) or actual landfill activities would occur on-site and the project would not emit a large amount of CH<sub>4</sub> (methane) emissions; refer to Table 4.8-1. Furthermore, the project would comply with all hydrofluorocarbon (HFC) regulations. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.<sup>1</sup> The project would not include hearths (woodstove and fireplaces) to be installed in the proposed transfer station facilities. As such, the proposed project would not conflict with the SLCP reduction strategy and would be consistent in this regard.

- 3-3 The commenter notes that the project would require a Full Solid Waste Facilities Permit from the Mono County Department of Environmental Health. As indicated in page 2-16 of the Draft IS/MND, the Solid Waste Facilities Permit has been identified as a permit required for the Mono County Environmental Health Department and CalRecycle, which is listed in the Draft IS/MND Section 2.6, *Permits and Approvals*.
- 3-4 The commenter concludes the letter by thanking the Lead Agency for the opportunity to comment and requests copies of any subsequent environmental documents, copies of public notices and Notices of Determination for the proposed project. This comment is acknowledged; and the Town of Mammoth Lakes will notify CalRecycle accordingly of future public notifications regarding this project.



# MONO COUNTY HEALTH DEPARTMENT

## Environmental Health

P.O. BOX 476, BRIDGEPORT, CA 93517 PHONE (760) 932-5580 • FAX (760) 932-5284  
 P.O. BOX 3329, MAMMOTH LAKES, CA 93546 PHONE (760) 924-1830 • FAX (760) 924-1831

June 8, 2021

Kimberly Cooke, Associate Planner  
 Town of Mammoth Lakes  
 P.O. Box 1609  
 Mammoth Lakes, CA 93546  
[kcooke@townofmammothlakes.ca.gov](mailto:kcooke@townofmammothlakes.ca.gov)

**Subject: SCH No. 2021050146** –Initial Study/Mitigated Negative Declaration Mammoth Disposal Transfer Station Expansion – Mono County SWIS No. 26-AA-0013

Dear Ms. Cooke:

Thank you for allowing the Mono County Department of Environmental Health to provide comments on the proposed Mammoth Disposal Transfer Station Expansion project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Mono County Environmental Health (Mono County EH) acts as the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle) in Mono County. Mono County EH also serves as the Certified Unified Program Agency (CUPA) for Mono County and regulates the storage, handling and disposal of hazardous materials and hazardous waste within Mono County.

4-1

Mono County EH comments on the proposed project and associated Initial Study/Mitigated Negative Declaration are as follows:

- Project Description, page 2-10. This section states that all municipal solid waste is removed within 72 hours of receipt to minimize odors and vectors. Title 14 CCR Section 17410.1 requires that solid waste facilities shall remove solid waste accepted at the site within 48 hours from the time of receipt.
- Project Description, page 2-10. This section states that transfer trailers containing municipal solid waste would either be parked in the building overnight or left outside and covered to minimize the propagation or attraction of flies, rodents or other vectors. Transfer trailers left outside and covered could potentially attract bears. Additional measures may need to be implemented if transfer station operations attract bears.
- Hazards and Hazardous Materials, page 4.9-3. This section states that the applicant is required to submit a Report of Facility Information (RFI) to Mono County; the discussion is relative to identification of hazardous wastes at the Buy-Back/Recycling Center and the Permanent Household Hazardous Waste Collection (PHHWC) facility. A Report of Facility Information, in the form of a Transfer/Processing Report, will be required for the Transfer Station facility, but does not apply to the Buy-Back/Recycling Center or the Permanent Household Hazardous Waste Collection (PHHWC) facility.

4-2

4-3

4-4

PHHWC facilities are operated by a public agency and are permitted and regulated by Mono County EH as the CUPA. There are specific construction and operating requirements for these types of facilities. Please contact Debbie Larson with Mono County EH CUPA at 760-924-1847 or [dlarson@mono.ca.gov](mailto:dlarson@mono.ca.gov) for specific requirements.

4-4  
cont

- A new Full Solid Waste Facilities Permit must be issued by the LEA with CalRecycle concurrence prior to beginning solid waste facility operations. Please contact me at 760-924-1846 or [jkearney@mono.ca.gov](mailto:jkearney@mono.ca.gov) for information regarding permitting requirements and timelines.

4-5

Thank you for the opportunity to comment on the environmental document for the proposed Mammoth Disposal Transfer Station Expansion Project. If you have any questions or concerns regarding these comments, please contact me at [jkearney@mono.ca.gov](mailto:jkearney@mono.ca.gov) or 760-924-1846.

4-6

Sincerely,



Jill Kearney, REHS

CC via electronic mail:

Louis Molina, Environmental Health Director

Christine Karl, CalRecycle

## **Response No. 4**

Jill Kearney, REHS  
Mono County Health Department  
June 8, 2021

- 4-1 The commenter provides an introductory statement and introduces the commenting party (Mono County Environmental Health). This comment is acknowledged. Refer to Responses to Comments 4-2 through 4-4 for responses to specific comments made.
- 4-2 Refer to Response to Comment 3-2.
- 4-3 The commenter notes that the transfer trailers described in page 2-10 of the Draft IS/MND could potentially attract bears if left outside overnight. The commenter suggests that additional measures may need to be implemented to minimize bear attraction. It is acknowledged that solid waste transfer station activities can attract bears, which is currently the existing condition at the project site. Existing measures to minimize wildlife attraction at the facility include placing solid waste in outdoor covered containers and removing the containers on a frequent basis. Proposed improvements to minimize bear (and wildlife) attraction include limiting wildlife access to the facility through the installation of a 10-foot tall masonry wall (along the east, west, and south sides of the property). Additionally, the majority of solid waste received would occur inside the transfer station to minimize wildlife access, while also using a misting system to reduce dust and minimize odors. The combination of the perimeter wall and solid waste handling operations within the transfer building are intended to minimize the potential for bear attraction to the proposed solid waste transfer station operation.
- 4-4 The commenter clarifies that a Report of Facility Information (RFI) would be required for the proposed Transfer Station facility of the project, rather than the Buy-Back/Recycling Center of the project. As such the requested clarification has been made to pages 4.9-2 and 4.9-3 of the Draft IS/MND and are reflected below and in Section 3.0, Errata, of this Final IS/MND.

### **Page 4.9-2, Response 4.9(a), Operations, Second Paragraph**

Transfer Station Facility. Pursuant to California Code of Regulations Sections 17407.5 and 17408.2, hazardous wastes would continue to be prohibited at the proposed solid waste transfer station. Notwithstanding, some hazardous waste can be included in the waste stream delivered to the facility, as with the existing condition. As such, Mammoth Disposal implements best management practices as part of the off-loading process to ensure that acceptance of hazardous materials is minimized. Personnel would monitor the off-loading of materials and inspect loads for hazardous, toxic or infectious wastes, and unacceptable e-wastes. Notwithstanding, the potential exists for hazardous wastes to be present in the waste stream that is received at the transfer station. In the event hazardous wastes are discovered, they would be transferred by a licensed hauler to a permitted disposal facility in accordance with applicable Federal, State, and local standards and regulations. Typical incidents that could result in the accidental



release of hazardous materials during sorting operations may include accidental spills. The Applicant is required to submit a Report of Facility Information (RFI) to Mono County (on behalf of the California Department of Resources Recycling and Recovery [CalRecycle]). An RFI is an operations and design plan that describes the facility and how it would comply with State Minimum Standards. RFIs are required to be kept current. Such reporting effectively identify all hazardous wastes, such that they can be properly removed from the waste stream. The project would be required to comply with all applicable standards and regulations regarding the handling and storage of hazardous materials pursuant to the Certified United Program Authority (CUPA), which is Mono County. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and impacts in this regard would be less than significant.

**Page 4.9-3, Response 4.9 (a), Operations, First Paragraph**

Buy-Back/Recycling Center. Similar to existing conditions, the proposed buy-back/recycling center would continue to accept household hazardous waste recycling. Acceptable recyclable materials at the proposed buyback/recycling center would include antifreeze, car batteries, used motor oil, latex paints, universal waste (mercury containing materials such as fluorescent tubes and thermostats), household batteries, electronic waste (or “e-waste”), Cathode Ray Tubes (CRT)s, household hazardous waste, acids, bases, poisons or solvents. As such, this facility provides the public an opportunity to properly dispose of such waste. Similar to the existing condition, these materials would be transported off-site. This facility would continue to comply with existing Federal, State, and local laws and regulations governing the acceptance of household hazardous waste. ~~The Applicant is required to submit a Report of Facility Information (RFI) to Mono County (on behalf of the California Department of Resources Recycling and Recovery [CalRecycle]). An RFI is an operations and design plan that describes the facility and how it would comply with State Minimum Standards. RFIs are required to be kept current. Such reporting effectively identify all hazardous wastes, such that they can be properly removed from the waste stream.~~ The buyback/recycling center would continue to serve the community by providing a proper disposal method for household hazardous waste in compliance with all applicable laws and regulations. As such, impacts as a result of the use, storage, and transportation of hazardous materials at the buyback/recycling center would be less than significant, similar to the existing condition. Compliance with all applicable laws and regulations.

- 4-5 Refer to Response to Comment 3-3.
- 4-6 The comment is conclusory, and no further response is necessary.



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## 3.0 ERRATA

Changes to the Draft IS/MND, which circulated from May 10, 2021 through June 8, 2021, are noted below. A double-underline indicates additions to the text; ~~strike through~~ indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, Response to Comments, of this Final IS/MND. These changes to the Draft IS/MND are based upon applicable updated information that was not available at the time of the Draft IS/MND publication. These changes are considered minor and editorial in nature and would not result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND that may affect the overall conclusions of the environmental document.

### SECTION 2.0, PROJECT DESCRIPTION

#### Page 2-10, *Transfer Station Building*, First Paragraph

A common wall and door would connect the transfer station building with the office building. The transfer station building would have a maximum building height of 35 feet. The project proposes to protect the transfer station building floor from vectors by closing the building doors at night. Transfer trailers containing municipal solid waste would either be parked in the building overnight or left outside and covered to minimize the propagation or attraction of flies, rodents, or other vectors. All municipal solid waste is removed within ~~72~~ 48 hours of receipt to minimize odors and vectors as well. Last, the proposed transfer station building would include a misting system to control dust and minimize odors.

#### Page 2-16, Section 2.6, *Permits and Approvals*, Second Paragraph

In addition, the following permits/approvals may be required of other agencies:

- Solid Waste Facilities Permit – Mono County Environmental Health Department and CalRecycle;
- NPDES Construction General Permit – Lahontan Regional Water Quality Control Board;
- ~~Construction Permit~~ Secondary Source Permit – Great Basin Unified Air Pollution Control District;
- Connection Permit – Mammoth Community Water District; and
- Fire Protection District Plan Review – Mammoth Lakes Fire Protection District.

**Page 4.3-8, Response 4.3(d), Second Paragraph**

Operations associated with municipal solid waste handling have the potential to generate detectable odors. The proposed transfer station building would receive municipal solid waste, construction and demolition debris, and wood waste and green waste debris. Waste would be dumped to the tipping floor on-site and then moved directly to large haul trucks for transport. Although the project would be permitted to receive an increased quantity of waste when compared to existing conditions, all municipal solid waste would be removed within ~~7248~~ hours of receipt to minimize odors. Additionally, operations at the proposed transfer station would be contained within the transfer station building and would include a misting system to control dust and minimize odors. Therefore, odors would be reduced when compared to existing conditions as the existing transfer station operations occur outside and are not enclosed within a building. Thus, the project would not result in other emissions (such as those leading to odors) that could adversely affect a substantial number of people. A less than significant impact would occur in this regard.

**Page 4.8-12, Table 4.8-2, Second Row**

**Consistent.** A solid waste transfer station receives municipal solid waste, then sorts, compacts, and transports such waste to an off-site end point. On-site operations also limit the amount of time solid waste remains at the facility to less than ~~7248~~ hours. As such, no decomposition (associated with extended timeframes) or actual landfill activities would occur on-site and the project would not emit a large amount of CH<sub>4</sub> (methane) emissions; refer to Table 4.8-1. Furthermore, the project would comply with all hydrofluorocarbon (HFC) regulations. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.<sup>1</sup> The project would not include hearths (woodstove and fireplaces) to be installed in the proposed transfer station facilities. As such, the proposed project would not conflict with the SLCP reduction strategy and would be consistent in this regard.

**Page 4.9-2, Response 4.9(a), Operations, Second Paragraph**

Transfer Station Facility. Pursuant to California Code of Regulations Sections 17407.5 and 17408.2, hazardous wastes would continue to be prohibited at the proposed solid waste transfer station. Notwithstanding, some hazardous waste can be included in the waste stream delivered to the facility, as with the existing condition. As such, Mammoth Disposal implements best management practices as part of the off-loading process to ensure that acceptance of hazardous materials is minimized. Personnel would monitor the off-loading of materials and inspect loads for hazardous, toxic or infectious wastes, and unacceptable e-wastes. Notwithstanding, the potential exists for hazardous wastes to be present in the waste stream that is received at the transfer station. In the event hazardous wastes are discovered, they would be transferred by a licensed hauler to a permitted disposal facility in accordance with applicable Federal, State, and local standards and regulations. Typical incidents that could result in the accidental release of hazardous materials during sorting operations may include accidental spills. The Applicant is required to submit a Report of Facility Information [RFI] to Mono County (on behalf of the California Department of Resources Recycling and Recovery [CalRecycle]). An RFI is an operations and design plan that describes the facility and how it would comply with State Minimum Standards. RFIs are required to be kept current. Such reporting effectively identify all hazardous wastes, such that they can be properly removed from the waste stream. The project would be required to comply with all applicable standards and regulations regarding the handling and storage of hazardous materials pursuant to the Certified United Program Authority (CUPA), which is Mono County. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous

materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and impacts in this regard would be less than significant.

**Page 4.9-3, Response 4.9(a), Operations, First Paragraph**

Buy-Back/Recycling Center. Similar to existing conditions, the proposed buy-back/recycling center would continue to accept household hazardous waste recycling. Acceptable recyclable materials at the proposed buyback/recycling center would include antifreeze, car batteries, used motor oil, latex paints, universal waste (mercury containing materials such as fluorescent tubes and thermostats), household batteries, electronic waste (or “e-waste”), Cathode Ray Tubes (CRT)s, household hazardous waste, acids, bases, poisons or solvents. As such, this facility provides the public an opportunity to properly dispose of such waste. Similar to the existing condition, these materials would be transported off-site. This facility would continue to comply with existing Federal, State, and local laws and regulations governing the acceptance of household hazardous waste. ~~The Applicant is required to submit a Report of Facility Information (RFI) to Mono County (on behalf of the California Department of Resources Recycling and Recovery [CalRecycle]). An RFI is an operations and design plan that describes the facility and how it would comply with State Minimum Standards. RFIs are required to be kept current. Such reporting effectively identify all hazardous wastes, such that they can be properly removed from the waste stream.~~ The buyback/recycling center would continue to serve the community by providing a proper disposal method for household hazardous waste in compliance with all applicable laws and regulations. As such, impacts as a result of the use, storage, and transportation of hazardous materials at the buyback/recycling center would be less than significant, similar to the existing condition. Compliance with all applicable laws and regulations.



Mammoth Lakes  
CALIFORNIA

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## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, [Table 1, \*Mitigation Monitoring and Reporting Checklist\*](#), has been prepared for the Mammoth Disposal Transfer Station Expansion Project (the “project”). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable Conditions of Approval relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the Mammoth Disposal Transfer Station Expansion Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the Town flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist ([Table 1](#)). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The Town distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study/Mitigated Negative Declaration, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the Town as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the Town with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.



- The Town prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the Town. Such changes could include reassignment of monitoring and reporting responsibilities, plan redesign to make any appropriate improvements, and/or modification, substitution or deletion of mitigation measures subject to conditions described in CEQA Guidelines Section 15162. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.





**Table 1**  
**Mitigation Monitoring and Reporting Checklist**

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
<b>CULTURAL RESOURCES</b>								
CUL-1	<p><b>Workers Environmental Awareness Program.</b> Prior to ground disturbing activities, the Project Applicant shall prepare and implement a Workers Environmental Awareness Program (WEAP) training to address cultural resources issues anticipated at the project site for review and approval by the Public Works Director. The WEAP shall include information of the laws and regulations that protect cultural resources, the penalties for a disregard of those laws and regulations, what to do if cultural resources are unexpectedly uncovered during construction, and contact information for a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, who shall be contacted in the case of unanticipated discoveries. The WEAP shall also include project specific information regarding the potential for and types of prehistoric and historic</p>	Project Applicant/ Contractor/ Qualified Archaeologist	Prior to Ground Disturbing Activities/ During Construction	Public Works Director	Prior to Ground Disturbing Activities/ During Construction			



**Table 1, Mitigation Monitoring and Reporting Checklist, continued**

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	resources that may potentially be encountered.							
CUL-2	<p><b>Archaeological and Native American Monitoring.</b> A qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology, and qualified Native American monitor shall be retained to perform all mitigation measures related to prehistoric and historic cultural and tribal cultural resources for the project. An archaeologist and Native American monitor shall be present to monitor all initial ground disturbing activities associated with the project, including but not limited to: removal of building asphalt, pot-holing or auguring, grubbing, weed abatement, boring/grading of soils, drilling/trenching for utilities, excavations associated with development, etc. The monitors shall complete monitoring logs on a daily basis. The logs shall provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. In addition, the monitors are required to provide insurance certificates, including liability insurance, for any archaeological</p>	Qualified Archaeologist/ Qualified Native American Monitor	Ground Disturbing Activities	Public Works Director	Ground Disturbing Activities			



**Table 1, Mitigation Monitoring and Reporting Checklist, continued**

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k).</p> <p>If, during initial ground disturbance, the monitors determine that the ground disturbing activities have little or no potential to impact cultural resources, and/or the monitors determine that ground disturbances would occur within previously disturbed and non-native soils, the qualified archaeologist may recommend that monitoring may be reduced or eliminated. This decision shall be made in consultation with the Native American monitor and the Town of Mammoth Lakes. The final decision to reduce or eliminate monitoring shall be at the discretion of the Town of Mammoth Lakes. If cultural resources are encountered during ground disturbing activities, work in the immediate area shall halt, the qualified archaeologist shall immediately notify the Public Works Director, and the find shall be evaluated for significance under the California Environmental Quality Act and National Historic Preservation Act</p>							



**Table 1, Mitigation Monitoring and Reporting Checklist, continued**

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	(NHPA). Consultation with the Native American monitor, the Native American Heritage Commission, and data/artifact recovery, if deemed appropriate, shall be conducted. The qualified archaeologist and monitors may reduce or stop monitoring dependent upon observed conditions.							
<b>TRANSPORTATION/TRAFFIC</b>								
TRA-1	Prior to issuance of a grading permit, the project Applicant shall prepare a Traffic Management Plan (TMP) for approval by the Town's Traffic Engineer. The TMP shall specify that one lane of travel in each direction on Commerce Drive must always be maintained during project construction activities. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours of truck traffic, temporary striping plans, and, if necessary, use of construction flag person(s) to direct traffic during heavy equipment use. The TMP shall be incorporated into project specifications for verification prior to final plan approval.	Project Applicant/ Contractor	Prior to Issuance of a Grading Permit/ Prior to Final Plan Approval	Public Works Director, or Designee	Prior to Issuance of a Grading Permit/ Prior to Final Plan Approval			



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