Attachment C

BaseCamp Environmental, Inc.

Memorandum

DATE: April 6, 2022

FROM: Town of Mammoth Lakes Community and Economic Development Department

RE: Addendum to Environmental Impact Report for Mammoth Yosemite Airport Terminal Area Development Project Improvements (SCH #2019100384)

This memo constitutes an addendum to the Environmental Impact Report for the Mammoth Yosemite Airport Terminal Area Development Project (TADP) Improvements. The Town Council certified the EIR on October 6, 2021. Since certification of the EIR, the Town determined that the Aircraft Rescue and Fire Fighting (ARFF) facility requires minor design changes. Those changes are intended to improve facility efficiency and provide additional space for airport operations. The proposed location of the ARFF facility does not change. Proposed changes to the EIR's description of the ARFF are shown in Table 1 below and in the attached Exhibit A:

Table 1: Comparison of Approved vs. Proposed ARFF Descriptions

TADP Approved	**TADP Proposed Revision**
ARFF Building: footprint 8,400 sq. ft.	ARFF Building: footprint 10,350 sq. ft.
Apron and parking: approximately 3,300 sq.yds.	Apron and parking: approximately 3,900 sq. yds.
Access Road: approximately 800 feet	Access Roads: 1,700 feet
Leach Field: Not specific to ARFF	Leach Field: For ARFF only

The modified ARFF facility, apron and parking area, and access road are located within the original approved project area. The access road has been lengthened, but this involves repaving an existing road to serve the ARFF facility. A sanitary leach field was originally proposed near the passenger terminal building; it is now proposed adjacent to the ARFF facility. Based upon a groundwater study, the proposed leach field would be downgradient of two water wells which serve the airport.

CEQA Guidelines Section 15162 states that when an EIR has been certified for a project, no subsequent EIR need be prepared for that project unless the Lead Agency (the Town in this case) determines one of the following:

- Substantial changes in the project or with respect to the circumstances under which the project is undertaken will require major revisions to the EIR due to new or more severe environmental impacts, or

- New information that was not known and could not have been known at the time the EIR was certified indicates new or more severe project environmental impacts.

If neither of the above conditions apply, then an addendum to the certified EIR may be prepared in accordance with CEQA Guidelines Section 15164.

As noted above, the proposed location of the modified ARFF facility has not changed. Environmental data and analyses presented in the certified EIR remain valid with respect to the modified ARFF, and there are no significant new circumstances or information relevant to environmental concerns or bearing on the proposed ARFF modifications or their potential environmental impacts. All improvements would occur within the existing developed area of the airport; no new undeveloped areas outside the airport would be for the modified ARFF. The proposed ARFF facility footprint and apron were extensively surveyed for environmental sensitivities in the EIR. The lengthened access road would be a reconstruction of an existing, but degraded, asphaltic surface. As noted, the proposed leach field location is downgradient of existing water wells; therefore, groundwater from these wells would not be subject to potential contamination.

Mitigation requirements of the certified EIR pertinent to the proposed ARFF modifications would be the same as for the approved ARFF. Surface disturbance impacts associated with the modified ARFF are the same as those identified in the certified EIR, and the proposed project revision would not require additional mitigation measures. The Town is required to obtain approval from the Mono County Department of Environmental Health for construction of the leach field.

This addendum describes minor technical changes to the certified EIR regarding the ARFF facility. Based upon the information provided above and in Exhibit A, the Town concludes that the proposed ARFF modifications would not involve new or more severe environmental impacts compared to those identified in the certified EIR. Therefore, the analysis and conclusions in the certified EIR remain valid for the proposed ARFF modification, and no subsequent EIR needs to be prepared.

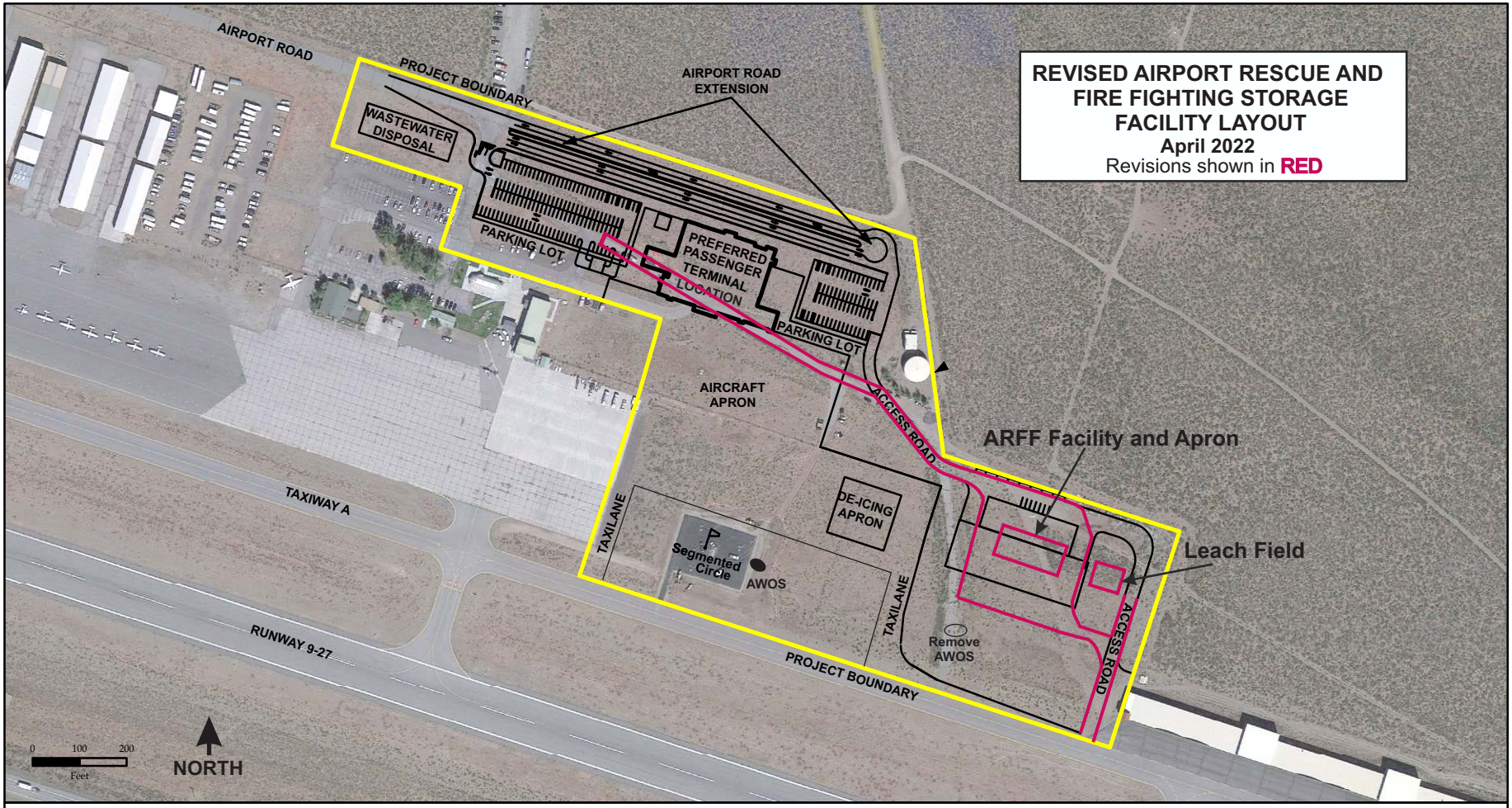


EXHIBIT A

Prepared by the Town of Mammoth Lakes, CA

Project Layout From:
Mammoth Yosemite Airport Terminal Area Development Plan, January 2017/April 2022
Image Source: Google, Sept. 2019

Draft Environmental Impact Report

Terminal Area Development Project
Proposed Project

MAMMOTH YOSEMITE AIRPORT
TOWN OF MAMMOTH LAKES

November 2021
Revised April 2022