

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WESTERN-PACIFIC REGION  
SAN FRANCISCO AIRPORTS DISTRICT OFFICE

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***FINDING OF NO SIGNIFICANT IMPACT***

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**MAMMOTH YOSEMITE AIRPORT  
PROPOSED TERMINAL AREA DEVELOPMENT PROJECT**

Town of Mammoth Lakes  
Mammoth Lakes, California



For further information

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November 12, 2021

## GENERAL INFORMATION ABOUT THIS DOCUMENT

**WHAT'S IN THIS DOCUMENT?** This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) for the Town of Mammoth Lakes (Town) proposed Terminal Area Development Project at Mammoth Yosemite Airport (MMH), Mammoth Lakes, California. This document includes the agency determinations and approvals for the Requested Federal Actions described in the Final Environmental Assessment (EA) dated November 2021. This document summarizes the alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Action and the No Action alternatives, which are evaluated in detail in the Final EA attached to this Finding of No Significant Impact.

**BACKGROUND.** The Town's Terminal Area Development Project includes construction and operation of a new passenger terminal building; new maintenance facility – storage for its Airport Rescue and Fire Fighting truck and Snow Removal Equipment; terminal aircraft apron; service roads; infrastructure and utilities to support the project; and demolition of an existing tensile structure. Additionally, an extension of Airport Road, the airport access road, would be constructed to the proposed new passenger terminal area.

Pursuant to Section 163(d) of the FAA Reauthorization Act of 2018 (Public Law [P.L.] 115-2540 the FAA retains review and approval authority for MMH Terminal Area Development Project over those areas within the Airport Layout Plan that materially impact the safe and efficient operation of aircraft at, to, or from an airport; adversely affect the safety of people or property on the ground adjacent to an airport because of aircraft operations; or adversely affect the value of prior federal investments to a significant extent. The Town also intends to seek federal funding support for the proposed Terminal Area Development Project, therefore, FAA will make determinations under 49 United States Code (U.S.C.) §§ 47106 and 47107 for the Airport Improvement Program and 49 U.S.C. 40117 for collection and use of Passenger Facility Charges for eligible components of the project.

The Draft EA was available for public and agency review from June 19, 2021 to July 23, 2021. A Notice of Availability (NOA) was advertised in *The Sheet* on June 19, 2021. The NOA provided the public and other interested parties with instructions on where to view and how to provide comments on the Draft EA. The Draft EA was available on the Town's website at <https://www.townofmammothlakes.ca.gov>, and printed copies of the Draft EA were available for review at the Town of Mammoth Lakes, Community and Economic Development Department, Planning Division; the Mammoth Yosemite Airport; and the Mono County Library, Mammoth Lakes Branch. The Town held a virtual public workshop, and a virtual public hearing, on July 19, 2021. No public or agency comments were received during the public hearing or public review period.

The Draft EA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) [Public Law 91-190, 42 United States Code §§4321-4347], the implementing regulations of the Council on Environmental Quality (CEQ) [40 Code of Federal Regulations Parts 1500-1508](November 28, 1978), and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures* and 5050.4B, *National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions*. An NOA for this FONSI and the Final EA have been issued and are also available at <https://www.townofmammothlakes.ca.gov/939/Terminal-Area-Development-Project-EAEIR>.

**WHAT SHOULD YOU DO?** Read this Finding of No Significant Impact and the Final EA to understand the actions that FAA intends to take relative to the Proposed Terminal Area Development Project.

**WHAT HAPPENS AFTER THIS?** The FAA will proceed with unconditional ALP approval for those portions of the Terminal Area Development Project for which the FAA has review and approval authority; and will consider approval of Town requests for federal funding support for eligible project components.

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
FINDING OF NO SIGNIFICANT IMPACT**

**MAMMOTH YOSEMITE AIRPORT  
PROPOSED TERMINAL AREA DEVELOPMENT PROJECT**

**TOWN OF MAMMOTH LAKES  
MAMMOTH LAKES, CALIFORNIA**

**1. Introduction**

This document is a National Environmental Policy Act of 1969 (NEPA), Finding of No Significant Impact (FONSI) on the environment as a result of the proposed Terminal Area Development Project (TADP) at the Mammoth Yosemite Airport (MMH or Airport). MMH is owned and operated by the Town of Mammoth (Town or Sponsor). MMH is a Title 14 Code of Federal Regulations (CFR) Part 139 certificated commercial service airport within the National Airspace System. The Town's proposed terminal area development includes construction and operation of a new passenger terminal, automobile parking lots, aircraft parking aprons, new maintenance facility, and supporting infrastructure. The TADP is proposed for construction within approximately 19-acres of undeveloped Airport property. The proposed TADP site is located to the east of the existing passenger terminal and south of the proposed Airport Road Extension shown in Exhibit 1-4 of the *Final Environmental Assessment, Proposed Terminal Area Development Project, Mammoth Yosemite Airport, Town of Mammoth Lakes, Mono County California* (Final EA), November 2021.

The FAA must comply with NEPA and other applicable statutes prior to the federal action of unconditional Airport Layout Plan (ALP) approval of those portions of the proposed terminal area development that are within its jurisdiction, and approval of federal funding support for eligible components of the project. The Town prepared this Environmental Assessment (EA) pursuant to requirements of Section 102(C) of NEPA, Council on Environmental Quality (CEQ) Regulations at 40 CFR Parts 1500-1508<sup>i</sup>, and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures*, and 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. The Town, issued the Draft Environmental Assessment on June 19, 2021 for a 35-day review that ended on July 23, 2021. This Final EA to documents the results of the environmental analysis. The FAA has completed its review of the Final EA, considered its analysis, and determined that no further environmental review is required. Therefore, the FAA is issuing this FONSI, accompanied and supported by the Final EA completing environmental review requirements for the MMH TADP.

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<sup>i</sup> CEQ Regulations adopted November 28, 1978. Preparation of the Draft EA was already in progress when the revised CEQ NEPA implementing regulations (40 CFR Parts 1500-1508) were promulgated in July 2020 and became effective on September 14, 2020. Accordingly, the EA was prepared in compliance with the previous version of the regulations, 40 CFR Parts 1500-1508 (1978, as amended in 1986 and 2005).

## 2. Project Purpose and Need

Chapter 1 of the Final EA provides a description of the Airport Background, Existing Passenger Terminal Facilities, Aviation Forecasts, Sponsor's Proposed Action, Sponsor's Purpose and Need, FAA's Purpose and Need, and Requested Federal Actions. Final EA Section 1.4.1 identifies the Sponsor's Purpose and Need as improvement of the safety and efficiency of passenger movement through the airport consistent with 49 United States Code (U.S.C.) § 47101(a)(7). The existing terminal building is a remodeled maintenance building that is too small to provide an acceptable level of service for arriving and departing passengers. Among the issues identified for the existing terminal are inadequate passenger accommodations; limited space for Transportation Security Administration screening; limited indoor hold room seating; and outdoor baggage handling facilities in a winter destination. Additionally, the terminal apron can only accommodate one aircraft at a time thereby limiting access. Beyond the terminal needs, the Town is expending funds to lease an undersized hangar for storage and maintenance of the Aircraft Rescue and Fire Fighting (ARFF) truck and associated equipment, Snow Removal Equipment (SRE), and other required supplies.

Final EA Section 1.2.2, summarizes the MMH aviation activity forecasts prepared by the Town in 2017 and updated in 2019 which were approved by the FAA<sup>ii</sup>. Table 1-1 Passenger Enplanement Forecast presents the past, existing and forecast enplanements for a 10-year period from 2018 through 2028. The Bombardier CRJ-700 an Airport Reference Code (ARC) C-III aircraft was identified as the critical aircraft for airport planning and design purposes. Nationwide, the Coronavirus (COVID-19) Pandemic negatively affected airline passenger travel in the first quarter of 2020 and MMH experienced significant decline passenger enplanements and ultimately commercial air service ceased due to travel restrictions.<sup>iii</sup> Copies of the MMH aviation activity forecasts and FAA approval are provided in Appendix B.

Section 1.4.2 of the Final EA, identifies the FAA's Purpose and Need related to the Proposed Action. The FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the United States. The FAA must ensure that the Proposed Action does not derogate the safety of aircraft and airport operations at MMH. Moreover, it is the policy of the FAA under 49 U.S.C. § 47101(a)(6) and (7) that airport development projects provide for the protection and enhancement of natural resources and the quality of the environment of the United States, and that airport construction and improvement projects that increase the capacity of facilities to accommodate passenger and cargo traffic be undertaken to the maximum feasible extent so that safety and efficiency increase, and delays decrease.

## 3. Proposed Action and Federal Actions

As described in the Final EA, Section 1.3, the Town's Proposed Action is construction and development of the TADP. The TADP is shown on Exhibit 1-4 and includes the following

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<sup>ii</sup> The analysis in this Final EA uses an aviation forecast prepared before the COVID-19 Pandemic began. The forecast provides a conservative estimate of the potential environmental impacts of the Proposed Action. FAA forecast approval was based upon the methodology, data, and conclusions at the time the document was prepared. However, it is necessary to acknowledge the impacts of the COVID-19 Pandemic on aviation activity, including reduced confidence in growth projections using currently-available data.

<sup>iii</sup> The Town has expressed its intent to maintain the 14 CFR Part 139 Certification at MMH and while continuing an emphasis accommodating scheduled and unscheduled charter flights.

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*Mammoth Yosemite Airport (MMH), Mammoth Lakes, California  
Finding of No Significant Impact  
Terminal Area Development Project  
November, 2021*

components: new passenger terminal building (maximum size of approximately 38,700 square feet [sq.ft.]); extension of Airport Road and new service roads; automobile parking lots for passengers and rental cars; aircraft parking apron; aircraft de-icing apron with de-icing fluid holding tank; connecting taxilane to Taxiway A; Maintenance, ARFF, and SRE building (maintenance facility); supporting infrastructure and utilities; demolition of the tensile structure; removal of the existing Automated Weather Observing System (AWOS) and installation of a new AWOS in new location. Additional detail for each of these TADP components is provided in Sections 1.3.1 through 1.3.10 of the Final EA.

Final EA Section 1.5, Requested Federal Actions, discloses that under Section 163(d) of the FAA Reauthorization Act of 2108, Public Law (P.L.) 115-2540, FAA retains review and approval authority for those areas within the ALP that:

- Materially impact the safe and efficient operations of aircraft at, to, or from an airport;
- Adversely affect the safety of people or property on the ground adjacent to an airport because of aircraft operations; or
- Adversely affect the value of prior federal investments to a significant extent.

Within its jurisdiction, FAA approvals are sought for the Proposed Action that is described in Section 1.3 of the Final EA:

- Unconditional approval of the portion of the ALP that depicts the TADP pursuant to 49 U.S.C. §§ 40103(b) and 47107(a)(16)(B);
- Determination under 49 U.S.C. §§ 47106 and 47107 that are associated with the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP), and under 49 U.S.C. § 40117, as implemented by 14 CFR Part 158.25 to use Passenger Facility Charges (PFC) collected at the Airport for the Proposed Action to assist with construction of eligible Proposed Action development items from the ALP.

#### **4. Reasonable Alternatives Considered**

##### **Evaluation and Screening of Alternatives**

As described in Chapter 2 of the Final EA, a thorough and objective review of a range of reasonable alternatives were considered in accordance with CEQ regulations (40 CFR § 1502.14). The alternatives evaluation included a two-step screening process, described in Final EA Section 2.2.1. Step-One screening considered whether the alternatives met the purpose and need for the Proposed Action using the following criteria:

- Safely and efficiently convey existing and future passengers through the Airport consistent with 49 U.S.C. § 47101(a)(7);
- Provide appropriate space for TADP functions with Airport Reference Code (ARC) C-III standards in accordance with design standards set forth in FAA Advisory Circular (A/C) 150/5300-13A, *Airport Design*; and
- Provide a facility to safely store and maintain airport fire-fighting and maintenance equipment including ARFF truck and SRE.

Step-Two screening determined if the alternatives that cleared Step-One would be feasible. The analysis of feasibility considered whether the alternative could be implemented, or be practical, from a technical or economic perspective. The criteria for feasibility included:

- **FAA Terminal Planning Guidance.** This is the ability to meet FAA design guidelines from A/C 150/5360-13A, Airport Terminal Planning (July 2018). Emphasis on considerations of terminal functionality, safety separation between aircraft aprons, aircraft parking capacity, and passenger ingress and egress.
- **Economically and Technically Feasible.** Evaluation of the alternatives economic and technical feasibility, and avoidance of unnecessary financial expenditures. Determined by examining the relative infrastructure requirements associated with each alternative evaluated.
- **Continued Airport Operations.** An assessment of the extent to which an alternative would interrupt normal airport operations, to include but not be limited to, temporary passenger terminal closures, and disruption or cancellation of flights.

Final EA Section 2.2 identifies the seven alternatives, three on-Airport, three off-Airport, and the No Action alternative, that were evaluated. The on-Airport alternatives are depicted in Exhibits 1-4, 2-1, 2-2, and 2-3. Table 2-1, Alternatives Screening Summary, depicts the results of the screening process. Final EA Section 2.3 provides the Alternatives Evaluation.

- **Proposed Action Alternative:** The Proposed Action alternative as described in Chapter 1, Section 1.3, and shown in Exhibit 1-4, includes construction and operation of:
  - **New Passenger Terminal:** The proposed terminal would include three passenger arrival/departure gates and would not exceed approximately 38,700 sq.ft, and would less than 35-feet in height. The existing tensile structure would be removed.
  - **Terminal Aircraft Apron.** The proposed terminal aircraft apron would accommodate up to three ARC C-III aircraft simultaneously. The terminal aircraft apron would be approximately 130,500 sq.ft. (14, 500 square yards.)
  - **De-icing Apron.** New aircraft apron designed for de-icing aircraft equipped with a holding tank for de-icing fluid.
  - **Connecting Taxilanes:** Two new taxilanes to connect the Terminal Aircraft Apron to Taxiway A.
  - **Automobile Parking:** Two new automobile parking lots, Terminal and Rental Car, with a combined capacity of up to 190 vehicles.
  - **Access and Service Roads:** The airport access road, Airport Road, would be extended to the new Terminal Building, and new service roads would be constructed.
  - **Maintenance Facility:** An 8-bay maintenance facility for storage of the ARFF truck and equipment, and SRE would be constructed. The building is estimated to be 8,400 sq.ft.
  - **Utilities:** Utilities consist of a Wastewater Treatment Facility and Disposal Field, Potable Water System, Electrical Service and Telecommunication infrastructure.
  - **Automated Weather Observing System:** The existing AWOS would be removed and a new AWOS would be installed near the Segmented Circle.

The Proposed Action met the Step-One screening criteria because it provides the Town's adequate space for its terminal complex needs to safety and efficiency in convey existing and future forecast passengers through MMH.

As discussed in Final EA Section 2.3.2.1, the Proposed Action provides sufficient space to meet the dimensional requirements of ARC C-III aircraft within the existing MMH boundary. The Proposed Action is located in an area that would not disrupt ongoing aircraft operations during construction activities. It was determined to be technically and economically feasible, therefore it met the Step-Two screening criteria.

- No Action Alternative: The No Action alternative is continued use of the existing passenger terminal with no change. The Town would continue to lease a hangar to meet its storage needs for the ARFF truck and fire-fighting equipment, and SRE. The No Action alternative is shown in Exhibit 2-1. The No Action alternative does not meet the Step-One screening criteria to achieve the Purpose and Need, and does not meet the Step-Two Feasibility screen. The No Action Alternative does not achieve the FAA Terminal Planning Guidelines, Economically and Technically Feasible criteria, and criteria for Continued Airport Operations. Although, the No Action alternative did not meet the criteria for Step-One or Step-Two, described in Final EA Sections 2.3.1.2 and 2.3.2.2, respectively, the No Action alternative is retained for further analysis in accordance with CEQ regulations at 40 CFR § 1502.14(d) and FAA Orders 1050.1F, paragraph 6-2.1.d, and 5050.4B, paragraph 706.d.
- Alternative A-1: Alternative A-1 would construct a new passenger terminal 250-feet south of the proposed Airport Road extension, east of the existing temporary terminal, and closer to the existing active airfield. The site is identified as Site A. The proposed maintenance facility and associated infrastructure would be located to the southeast of the terminal location. Exhibit 2-2 provides a depiction of Alternative A-1. Alternative A-1 met the Step-One screening, Final EA Section 2.3.1.3, because it achieves the Purpose and Need by accommodating the forecast activity, passenger services, terminal aircraft apron, and maintenance facility. The Step-Two screening, described in Final EA Section 2.3.2.3, eliminated Alternative A-1 from further consideration as the proposed terminal location did not achieve the ARC C-III runway and taxiway separation standards, therefore it was not feasible.
- Alternative A-2: Alternative A-2, shown in Exhibit 2-3, would renovate the existing passenger terminal and construct a new maintenance facility and associated infrastructure. The existing terminal building, a remodeled maintenance building, has a floor area of approximately 5,060 sq.ft., which would be expanded to approximately 38,700 sq.ft. Alternative A-2 met the Step-One screening, Final EA Section 2.3.1.4, because it provides an expanded terminal that could meet the passenger and forecast activity levels, along with a new maintenance building for the ARFF and SRE storage needs. As described in Final EA Section 2.3.2.4, Alternative A-2 was eliminated from further consideration as a result of the Step-Two screen due to the feasibility challenges of maintaining operations during construction given the existing terminal configuration.
- Alternative A-3: Would develop TADP facilities at an existing commercial service airport other than MMH. Alternative A-3 considered Reno-Tahoe International Airport (RNO), and Bishop Airport (BIH). As a result of P.L. 95-504, the Airline Deregulation Act of 1978, neither

the FAA nor the Town, has the authority to direct or limit air carrier, or limit Airport operations. This includes determining which airports that air carriers provide service to. Additionally, the Town is obligated to adhere to Airport Sponsor Assurances which require expending its airport revenue on the airport which it owns and operates, in this case MMH. Development of TADP facilities at another commercial service airport did not meet the screening criteria in Step-One, described in Final EA Section 2.3.1.5, therefore it was eliminated from further consideration.

- Alternative A-4: Develop a new airport at another location as a replacement for MMH. Development of another airport would require infrastructure capable of meeting all applicable FAA airport design standards and handling all the existing and forecast operations at MMH. Constructing a new airport on another site would require sufficient revenue and time to identify an adequately size site; comply with all applicable federal, state, and local environmental laws; complete design and construction to provide infrastructure to support an airport similar to MMH. As described in Section 2.3.1.6 of the Final EA, Alternative A-4 did not meet the Step-One screening criteria because it does not address the inability of the existing passenger terminal and maintenance hangar to accommodate the existing or forecast passenger demand, improve the function, or increase the ability to provide quality service at MMH. Therefore, Alternative A-4 was eliminated from further consideration in Step-One.
- Alternative A-5: Use of alternative modes of surface transportation, such as a train or bus. The Eastern Sierra region, which includes MMH, is not served by passenger rail service. Amtrak, passenger rail service, offers Amtrak Thruway bus service to the Town from Reno, Nevada, but not to MMH or any other location on Highway 395 south of the Town. The Eastern Sierra Transit Authority (ESTA) provides intercity bus service to the Town from locations in Nevada and Southern California. ESTA does not provide service to MMH. ESTA bus service connects with Metrolink commuter rail service in Lancaster, California. Use of alternate modes of transportation did achieve the Step-One screening criteria, described in Final EA Section 2.3.1.7, because it does not provide the Town with the ability to meet the MMH passenger terminal needs to safely and efficiently convey existing and future passengers through the Airport. Alternative A-5 was eliminated from further consideration in the Step-One evaluation.

### **Alternatives Carried Forward for Detailed Consideration**

As detailed in Section 2.4 of the Final EA, two alternatives, the Proposed Action and the No Action alternatives were carried forward for detailed evaluation in the EA.

## **5. Assessment**

The potential environmental impacts of the No Action and Proposed Action alternatives were evaluated in Environmental Consequences, Chapter 4 of the Final EA. The Final EA was reviewed by the FAA and found to be adequate for the purpose of the Requested Federal Actions identified in Section 1.5. The FAA determined that the Final EA adequately describes the potential impacts of the Proposed Action and No Action alternatives.

Final EA, Chapter 3, Affected Environment, Section 3.2 identified environmental resource categories eliminated from consideration because the resource is not within or adjacent to the study area within the existing Airport boundaries shown in Exhibit 1-2 or that the No Action and Proposed Action would not affect the resource. The environmental resource categories eliminated from consideration were: Coastal Resources; Farmlands; Water Resources – Wild and Scenic Rivers, Wetlands, Floodplains, and Surface Waters.

Final EA, Chapter 4 – Environmental Consequences examined the following environmental impact categories in detail: Air Quality; Biological Resources; Climate; U. S. Department of Transportation Section 4(f) [DOT Section 4(f)]; Hazardous Materials, Solid Waste, and Pollution Prevention; Historical, Architectural, Archaeological, and Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Noise Compatible Land Use; Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks; Visual Effects; Water Resources – Groundwater; and Cumulative Effects.

**Air Quality:** Final EA Section 4.2.1. The Airport, located in Mammoth Lakes Planning Area as designated by the Great Basin Unified Air Pollution Control District (District) as shown in Exhibit 3-1. The Mammoth Lakes Planning Area is classified as in Attainment or Unclassified for all the National Ambient Air Quality Standards (NAAQS) with the exception of the 24-hour Particulate Matter<sub>10</sub> (PM<sub>10</sub>) standard. The Mammoth Lakes Planning Area is NAAQS standard for 24-hour PM<sub>10</sub> is Maintenance.

Emissions were quantified using California Emissions Estimator Model (CalEEMod) version 2016.3.2. Table 4-1, General Conformity *De Minimis* Thresholds and Air Pollutant Emissions, demonstrates that the Proposed Action and No Action alternatives would not exceed the general conformity *de minimis* thresholds under the Clean Air Act.

As the Proposed Action would not result in a significant impact on air quality, no mitigation measures are required. However, Section 4.2.1.3 of the Final EA, identified Best Management Practices (BMPs) would be utilized to further minimize air emissions associated with construction of the Proposed Action.

**Biological Resources:** Final EA Section 4.2.2. As discussed in Section 3.3.2 the evaluation of Biological Resources was conducted for the study area shown in Exhibit 3-2. The unpaved area is composed primarily of sagebrush scrub, characterized by low, generally sparse shrubs and native weedy herbaceous species. Common species include sagebrush (*Artemisia tridentate*), antelope brush (*Purshia tridentata*), rubber rabbitbrush (*Ericameria nauseosa*), Parry’s rabbitbrush (*E. Parryi*), desert peach (*Prunus andersonii*), tumbleweed (*Salsola tragus*), and cheatgrass (*Bromus tectorum*). There are also a few ornamental trees in the study area. Vegetation covers less than 50 percent of the study area. Wildlife species occur throughout the area, but, they are generally transient foragers that do not linger. Mule deer tracks were present, although no mule deer were observed during the biological site survey.

A list of federal threatened and endangered species, and designated critical habitat (federally listed species) was obtained from the United States Fish and Wildlife (USFWS) Information for Planning and Conservation (IPaC) database in April 2021. Table 3-3, Federally Threatened, Endangered and Proposed Threatened/Endangered Species and Designated Critical Habitat within Five Miles of the Mammoth Yosemite Airport, identifies the federally listed species known or with the potential to

occur within a five-mile radius of the Airport and the likelihood of their occurrence within the study area. Of the twelve species considered, Sierra Nevada yellow-legged frog (*Rana sierra*), Yosemite toad (*Anaxyrus canorus*), North American wolverine (*Gulo gulo luscus*), Fisher (*Pekania pennanti*), Southwestern willow flycatcher (*Empidonax traillii extimus*), Yellow-billed cuckoo (*Coccyzus americanus*), Monarch butterfly (*Danaus plexippus*), no suitable habitat occurs within the Study Area.

As discussed in Section 4.2.2.3 of the Final EA, the Biological Resource Assessment, located in Appendix C, did not identify any potential effects to federally-listed threatened or endangered species or designated critical habitat.

Pursuant to Section 7 of the Endangered Species Act, the FAA determined that implementation of the Proposed Action would have “no effect” on federally listed threatened or endangered species or designated critical habitat. Thus, implementation of the Proposed Action would not result in a significant biological impact.

**Climate:** Final EA Section 4.2.3. As discussed in Section 3.3.3, research shows a direct correlation between hydrocarbon fuel combustion and Greenhouse gas (GHG) emissions that trap heat in the earth’s atmosphere. As noted in FAA 1050.1F Desk Reference, Section 3.2, for FAA project-level actions, the affect environment for climate is highly dependent on the project itself and is defined as the entire geographic area that could be either directly or indirectly affected by the Proposed Action. For this project, this was identified as the study area defined in Exhibit 3-1. Table 4-2 GHG Emissions, presented in Section 4.2.3.3, discloses GHG operational emissions of the Proposed Action as 377.7 Metric Ton Carbon Dioxide equivalent (MT CO<sub>2</sub>e) annually and the No Action alternative as 128.0 MT CO<sub>2</sub>e.

**Department of Transportation Act, Section 4(f):** Final EA Section 4.2.4. Section 3.3.4 of the Final EA, identified that the Inyo National Forest is a U. S. Department of Transportation Act of 1966, as amended, 49 U.S.C. § 303 (c), [DOT Section 4(f)] protected property. However DOT Section 4(f) regulations indicate that when a property is formally reserved for a future transportation use, interim use as a park, recreation area or wildlife and waterfowl refuge would not be considered a DOT Section 4(f) use. A portion of Inyo National Forest is adjacent to MMH and is included in the study area as shown in Exhibit 3-3. In 1984, the U. S. Department of Agriculture, Forest Service (USDA-FS) provided Mono County, the then owner and operator – airport sponsor of MMH, with a permanent easement for a road/highway right-of-way for what is now Airport Road. The easement extends from Hatchery Creek Road to the old Convict Lake Road. Final EA Section 4.2.4 identifies the procedural requirements utilized for complying with DOT Section 4(f). The FAA evaluated the 1984 easement to Mono County which was transferred to the Town, as the current airport sponsor. The FAA determined that the proposed extension of Airport Road would not be subject to DOT Section 4(f) in accordance with 23 CFR § 774.11(h). Although the area functioned as a park, recreation, or wildlife refuge in the interim, the property within the easement was formally reserved for a future transportation facility. On November 3, 2020, the FAA sought USDA-FS concurrence, as the official with jurisdiction, with its assessment. On December 15, 2020, the USDA-FS concurred that DOT Section 4(f) does not apply to the Proposed Action paved extension of Airport Road. Then on February 18, 2021, Mono County acknowledged its intent to coordinate the easement requirements for the Proposed Action road extension component with the Town and USDA-FS. Final EA, Appendix H contains copies of the DOT Section 4(f) consultation. No impact to DOT Section 4(f) resources would occur with implementation of the Proposed Action alternative.

**Hazardous Materials, Solid Waste, and Pollution Prevention:** Final EA Section 4.2.5. As discussed in Section 3.3.5 of the Final EA, the study area shown in Exhibit 3-2, does not contain any Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or hazardous material sites. U. S. Environmental Protection Agency's (EPA) RCRA database includes a site related to Hot Creek Aviation LLC, which is located on MMH property, west of the study area. In 1998 fuel leaks from buried underground storage tanks were identified, remediated and the site closed in 2006. Final EA Section 4.2.5.2 identifies that under the No Action alternative the quantity of fuel is expected to increase consistent with the general aviation operations forecast for MMH, as air carrier aircraft do not refuel at MMH. De-icing operations would continue to occur in accordance with the existing industrial stormwater permit. Solid waste would continue to be disposed of at the Benton Road Landfill until its closure on January 1, 2023. After Benton Road Landfill closure solid waste will be collected by Mammoth Disposal Company.

The Proposed Action alternative, Final EA Section 4.2.5.3, is identified as including the storage, transport, use and disposal of hazardous material in compliance with current regulations. The Proposed Action includes construction of a maintenance facility which would store hazardous materials de-icing liquids, ARFF truck and supplies, and SRE. Activities that transport, utilize, and store hazardous materials would be required to do so in compliance with applicable local, state, and federal regulations, including the MMH Spill Prevention Control, and Countermeasures Plan, and Hazardous Materials Business Plan. De-icing fluid would be utilized on the proposed de-icing apron which would drain to a specific holding tank. Deicing fluid would be collected until it is removed and transported to the licensed facility at Buttonwillow Landfill. An industrial stormwater permit, General Stormwater Permit, from the State Water Resources Control Board is required. The Proposed Action also includes minor increases in solid waste generation and disposal when compared to the No Action alternative. No significant impact to Hazardous Materials, Solid Waste, and Pollution Prevention are expected to occur with implementation of the Proposed Action alternative.

**Historic, Architectural, Archaeological, and Cultural Resources:** Final EA Section 4.2.6. The Area of Potential Effects (APE) for evaluation of Historic, Architectural, Archaeological and Cultural Resources is shown in Exhibit 3-2. As described in Section 3.3.6, evaluation of the APE for direct and indirect effects is documented in the *Cultural Resources Inventory and Effects Assess for the Mammoth-Yosemite Airport Terminal Area Development Plan, Town of Mammoth Lakes, Mono County, California* (cultural resource inventory) included in Final EA, Appendix E. Evaluation of the APE included a record search, physical transect survey, and assessment of the results. Information for one potential road resource was updated during the conduct of the cultural resource inventory. No architectural or cultural resources were located within the APE.

Search of the Sacred Lands File by the Native American Heritage Commission (NAHC) did not identify any known resources within the APE. The FAA initiated government-to-government consultation with the Big Pine Paiute Tribe of Owens Valley, Bishop Paiute Tribe, Bridgeport Paiute Indian Colony, Fort Independence Indian Community of Paiutes, Lone Pine Paiute-Shoshones, Mono Lake Indian Community, Southern Sierra Miwuk Nation, and Utu Utu Gwaitu Tribe of the Benton Paiute Reservation on November 22, 2019. No responses were received.

On February 11, 2020, the FAA submitted its APE, cultural resource inventory, and determination that no resources listed in or eligible for the National Register of Historic Places are present within

the APE, and it's finding of "No Historic Properties Affected" to the California State Historic Preservation Officer (SHPO). On February 19, 2020, the SHPO expressed no concern with the APE and concurred with the FAA's APE and finding of "No Historic Properties Affected". The FAA consultation letter and the SHPO response letter are provided in Appendix E of the Final EA.

As described in Section 4.2.6 of the Final EA, the No Action and Proposed Action alternatives would have no impact on historic, architectural, archaeological, and cultural resources. Section 4.2.6.4 includes an Avoidance and Conservation Measure to stop work in the immediate area if unanticipated resources are discovered during construction activities. Procedures contained within 36 CFR § 800.13 will be implemented and a qualified archaeologist (36 CFR Part 61) will be notified. The archaeologist will evaluate the resource and consult with the Town and the FAA. Should human remains be discovered, the Mono County coroner will be notified and if the remains are determined to be Native American in origin, the NAHC will be notified, and the most likely descendant identified for treatment of the remains.

**Land Use:** The potential for land use impacts were assessed in Section 4.2.7 of Final EA by evaluating the existing and proposed changes in land use within the study area shown in Exhibit 3-5. Existing land use, described in Section 3.3.7 include the Town General Plan land use designation of Airport and Town zoning of Airport which are shown in Exhibit 3-6. The Airport occupies 196.23-acres owned by the Town, 33-acres leased from Los Angeles Department of Water and Power (LADWP), and 20.36 acres under Special Use Permit from USDOT-FS. Land use in the immediate vicinity of MMH, between Hot Creek and Convict Creek, include agricultural open space (grazing) and areas zoned Resource Management by Mono County. Land north, northwest, and south of MMH is within the Inyo National Forest which is managed by USDOT-FS. The land northeast of MMH are undeveloped and managed by the U. S. Bureau of Land Management or owned by LADWP. No residential areas are within or in the immediate vicinity of the study area.

The Town provided the FAA with its grant assurance – land use assurance letter committing to maintaining consistency with Airport operations on April 30, 2021 (Final EA, Appendix I) The letter specifies that appropriate action has been or will be taken, to the extent reasonable, to restrict the use of land next to or near the Airport to uses that are compatible with normal airport operations pursuant to 49 U.S.C. §47107(a)(10).

Under the No Action alternative, described in Final EA Section 4.2.7.1, no land use changes would occur. The Proposed Action, described in Final EA Section 4.2.7.2, would result in construction of the proposed project components identified in Final EA Section 1.3. The Proposed Action development is consistent with the use of Airport property and the Town's General Plan designations and zoning. The Proposed Action, including extension of Airport Road within the USDOT-FS easement, would not conflict with land management by USDOT-FS and LADWP. No land use impacts would occur within implementation of the Proposed Action alternative.

**Natural Resources and Energy Supply:** Natural resources and energy supply are addressed in Section 4.2.8 of the Final EA. Final EA Section 4.2.8.1 evaluates the No Action alternative, which includes no construction of new buildings or associated improvements. It is estimated that the No Action alternative would lead to less-efficient energy use, as the existing terminal structure and hangar that house the ARFF equipment and other activities would continue to be used. The existing terminal and tensile structure were not constructed utilizing energy conservation objectives.

Final EA Section 4.2.8.2 identifies that the Proposed Action would increase consumption of electricity and propane gas, since the terminal and maintenance buildings would be larger than the existing structures. The Proposed Action would be developed consistent with FAA Order 1053.1, *Energy and Water Management Program for FAA Buildings and Facilities*. While Order 1053.1 provides direction for FAA-owned and leased buildings and facilities, the Town intends to utilize the Order as it provides energy and water management guidance for sustainability such as use of clean energy sources. Construction of the Proposed Action would involve materials such as asphalt, concrete, and aggregate from available from commercial sources. Neither the No Action nor Proposed Action alternatives would result in significant Natural Resource and Energy Supply impacts.

**Noise and Noise-Compatible Land Use:** The existing noise environment at MMH was developed using the Aviation Environmental Design Tool (AEDT) Version 2d, the most recent version available when the analysis was conducted. Community Noise Equivalent Level (CNEL) 65, 70, and 75-decibel (dB) contours were developed for the Affected Environment and the Environmental Consequences analysis. Exhibit 3-7 provides the Affected Environment CNEL 65, 70, and 75-dB noise contours for 2018. These contours are confined to the Airport property and are primarily over the runway pavement. As shown in Exhibit 3-7 the noise generated from MMH related aviation operations is compatible with the land uses surrounding the airport.

The Environmental Consequence, Noise and Noise-Compatible Land Use analysis is presented in Section 4.2.9. Exhibits 4-1 and 4-2, present future No Action alternative operational noise contours for the years 2023 and 2028, respectively. The No Action alternative CNEL 65, 70, and 75-dB noise contours remain within the boundary of MMH, and do not extend beyond the runway operations area.

Final EA Section 4.2.9.2 presents the analysis of the Proposed Action alternative. Exhibits 4-3 and 4-4 provide the Proposed Action alternative CNEL 65, 70, and 75-dB noise contours for the years 2023 and 2028, respectively. Similar to the No Action alternative, these contours remain within the boundary of MMH, and do not extend beyond the runway area of the MMH operations area. The proposed TADP facilities would not contribute to aviation operation noise. Short-term noise from construction of the Proposed Action alternative would generally be confined to the study area and the immediate vicinity. No noise sensitive land uses are in the immediate vicinity of MMH. The nearest residences are approximately 1 mile to the southeast. Implementation of the Proposed Action alternative would not result in a Noise or Noise-Compatible Land Use impact.

**Socioeconomic, Environmental Justice, and Children’s Environmental Health and Safety Risks:** Final EA Section 4.2.10. Final EA Section 3.3.10 identifies that MMH and the surrounding area are located in Mono County Census Tract 1.01, as shown in Exhibit 3-8. Census Tract 1.01 represents all of the southern Mono County, except for the Town. It includes the communities of June Lake, Crowley Lake, Aspen Sprigs, Tom’s Place and Swall Meadows.

Section 4.2.10.1 of the Final EA assesses the No Action alternative for impacts to Socioeconomic, Environmental Justice, and Children’s Environmental Health and Safety Risks. Under the No Action alternative, no construction would occur and aviation operations would continue under current conditions. Low-income and minority residents, and businesses would be unaffected. Additionally, there are no locations with concentrations of children near MMH, therefore no disproportionate risk to children’s environmental health and safety would occur.

Final EA Section 4.2.10.2 evaluated the Proposed Action alternative utilizing “factors-to-consider” identified in FAA Order 1050.1F, Exhibit 4-1. The Airport is located six miles east of the Town in an area that is mostly undeveloped except for the Sierra Business Park industrial tract located west of the Airport and south of U. S. Highway 395. The Proposed Action would be implemented entirely within Airport property. The Sierra Business Park would not be affected, no community businesses or residents would be relocated. The Proposed Action includes extension of Airport Road to improve traffic flow and access to MMH. The proposed extension would not disrupt local traffic patterns or substantially reduce the level of service of the roads. The Town would terminate its lease for the privately owned hangar which is used for the ARFF and SRE storage. The hangar would then be available for aircraft storage. No residential or business relocations would occur. No Environmental Justice or Children’s Environmental Health and Safety Risk impacts would occur since there are no environmental justice populations, schools, or services specific to children within or near MMH.

Neither, the No Action or Proposed Action alternatives would result in Socioeconomic, Environmental Justice or Children’s Environmental Health and Safety Risk impacts.

**Visual Effects:** Section 3.3.11 of the Final EA, describes the existing conditions related to Visual Effects. MMH is located along the north side of U.S. Highway 395, a State of California designated scenic highway. The California Department of Transportation (Caltrans) official designation occurred on November 9, 1971. Scenic highway designations include the visible area outside the highway’s right-of-way, which for MMH include buildings and aircraft hangars that are visible from the road. Exhibit 3-9 provides a depiction of the Airport looking north from Highway 395. The analysis of the No Action alternative, is presented in Final EA Section 4.2.11.1. The No Action alternative would not change the visual character and lighting described in Section 3.3.11. Final EA Section 4.2.11.2 analyzed the Proposed Action alternative. The buildings proposed with the TADP would be designed to have a more distinctive appearance from the existing terminal building, but would maintain similar architectural character and physical appearance to the surrounding area. It is likely the new terminal would be more visible from U. S. Highway 395. Use of materials such as wood, stone and stucco, with subdued exterior color would not detract from the visual landscape in the area.

The Proposed Action would include additional safety and security lighting associated with the new terminal building, new maintenance building, and associated parking areas. Outdoor lighting not associated with aircraft operations would be designed to comply with location Mammoth Lakes Municipal Code Section 17.36.030. This local code requires all outdoor lighting fixtures to be designed, located, installed, aimed downward or toward structures, and maintained to prevent glare, light trespass, and light pollution. The closest light-sensitive land use is approximately 1-mile southeast of the MMH project area and light from the Airport is not expected to illuminate the residential area or Sierra Nevada Aquatic Research Laboratory. While the additional lighting and change in the visual aspects of a new terminal and maintenance building would occur with implementation of the Proposed Action, a significant Visual Effect impact would not occur.

**Water Resources – Groundwater:** Final EA Section 4.2.12. As discussed in Section 3.3.12, MMH is located in the southwestern portion of the Long Valley Caldera and is within the Long Valley Groundwater Basin. Based upon well log data there is a 150-foot thick clay deposit, confining layer at a depth of 140-feet beneath the Airport. The depth of unconfined shallow groundwater varies between 28 and 46 feet below the ground surface. Generally groundwater flows are west to east.

Geologic and groundwater maps presented in Appendix G. The aquifer underlying the Airport is not within the U.S. EPA's sole source drinking water locations. Under the No Action alternative, evaluated in Final EA Section 4.2.12.1, no additional demand would be placed on the MMH water system. The existing wastewater septic tank and gravity-fed leach field would remain in operation.

The Proposed Action alternative is addressed in Section 4.2.12.2 of the Final EA. The proposed new terminal and maintenance buildings would be connected to the existing Airport water supply system. Water consumption would increase incrementally with the passenger activity levels identified in the aviation activity forecasts in Final EA Section 1.2.2, and staffing levels at the Airport. Adequate water supply for potable and fire-fighting needs exists at MMH. The Proposed Action would result in the need for a multi-staged underground self-contained wastewater treatment plant. Installation is proposed for west of the new terminal building within the study area. Wastewater would be disposed of in a new leach field up gradient from the water wells. Construction would occur consistent with the *Mono County Health Department Construction Guide for Residential and Commercial On-Site Sewage Treatment & Disposal Systems* and Mono County Ordinance Title 14-*Water and Sewage*. Copies are provided in Appendix G. Construction activities would not interface with the depth of groundwater. The Proposed Action would not result in a significant impact to groundwater.

**Cumulative Impacts:** Section 4.3 of the Final EA provides the Cumulative Impact analysis of past, present, and reasonably foreseeable future actions that are identified in Final EA Section 3.3.13 and Section 4.3.1., Table 4.1. The cumulative impact analysis consider projects within one-mile around the project area and to the Bishop Airport. The cumulative impact temporal boundary considered the time period from 2016 to 2026.

The cumulative impact analysis in Section 4.3.2 of the Final EA, concluded that the Proposed Action, when combined with other past, present, and reasonably foreseeable future actions would not result in significant cumulative impacts to Air Quality; Biological Resources; Climate; DOT Section 4(f); Hazardous Materials, Soil Waste, and Pollution Prevention; Historical, Architectural, Archaeological, and Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Noise-Compatible Land Use; Socioeconomic, Environmental Justice, and Children's Environmental Health and Safety Risks; Visual Effects; and Water Resources - Groundwater.

- 6. Public Participation:** Chapter 5 of the Final EA, details agency coordination and the public involvement process. Public and agency scoping occurred with the Town's publication of a scoping notice issued on October 19, 2019. The scoping notice was posted on the Town's website and advertised in the *The Sheet*, a newspaper of general circulation. On October 24, 2019, the Town held a scoping meeting to present the proposed project, solicit concerns, and accept input. Scoping comments were solicited for 30-days, until November 18, 2019.

The public was then encouraged to review and comment on the Draft EA. The Town published a Notice of Availability (NOA) of the Draft EA for public review and comment on June 19, 2021, in *The Sheet* and on the Town's website at <https://www.townofmammothlakes.ca.gov>. Print copies of the Draft EA were available for review at the Town of Mammoth Lakes, Community and Economic Development Department; Mammoth Yosemite Airport; and Mono County Library, Mammoth Lakes Branch. The public comment period occurred for 35 days from June 19, 2021 until July 23, 2021. On July 19, 2021, a virtual public workshop, followed by a virtual public hearing was held. A copy of the

public hearing transcript is provided in Appendix J. No comments were received during the public hearing or during the public review of the Draft EA.

## 7. Inter-Agency Coordination

Inter-agency coordination under 49 U.S.C. § 47101(h), is not required because the Proposed Action does not involve construction of a new airport, new runway, or major runway extension that has a significant impact on natural resources including fish and wildlife; natural scenic and recreational assets; water and air quality; or another factor affecting the environment.

## 8. Reasons for the Determination that the Proposed Action will have No Significant Impacts

The attached Final EA examines each of the environmental resource and the potential for direct and indirect effects from the Proposed Action. The Town's requested unconditional ALP approval of areas within FAA jurisdiction and potential federal funding support through the AIP or PFC for eligible project components would not result in any environmental impacts that would exceed the thresholds of significance as defined in FAA Orders 1050.1F and 5050.4B.

Based on the information contained in this FONSI and supported by detailed discussion in the Final EA, the FAA has selected the Proposed Action, described in Chapter 1, Section 1.3, as the FAA's Preferred Alternative and Section 3 of this FONSI. The FAA determined that the Proposed Action meets the purpose and need for the proposed action, would not cause any significant environmental impacts, and is the most reasonable, feasible and prudent alternative. The FAA has decided to unconditionally approve the proposed development within the MMH ALP as it is described in Chapter 1, Section 1.3 of the Final EA and summarized in Section 3 of this FONSI.

## 9. Agency Findings and Determinations.

The FAA makes the following findings and determinations for this project based on the information and analysis set forth in the Final EA and other portions of the administrative record.

- a. **FAA finds, the Proposed Action is reasonably consistent with existing plans of public agencies for development of the area [49 U.S.C. § 47106(a)].** The Proposed Action is consistent with the Town's plans, goals and policies for the area. The Proposed Action is also consistent with the applicable regulations and policies of federal, State, and local agencies.
- b. **FAA finds the Proposed Action is reasonably necessary for use in air commerce or in the interests of national defense [49 U.S.C. § 44502(b)].**
- c. **Independent and Objective Evaluation:** As required by the Council on Environmental Quality (40 CFR § 1506.5) the FAA has independently and objectively evaluated this Proposed Action. As described in the Final EA, the Proposed Action and No Action Alternatives were studied extensively to determine the potential impacts and appropriate mitigation measures for those impacts, if warranted. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the proposal.

- d. Endangered Species Act:** Pursuant to the Endangered Species Act of 1973, as amended, the FAA determined that the Proposed Action will have “*no effect*” on federally listed species.
- e. National Historic Preservation Act:** FAA finds the Proposed Action will not affect any historic properties listed or eligible for listing on the National Register of Historic Places. FAA conducted the required consultation with the SHPO pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. That consultation resulted in a “*No Historic Properties Affected*” concurrence.
- f. Department of Transportation, Section 4(f):** The FAA evaluated the permanent easement for a road/highway right-of-way for a portion of Inyo National Forest provided by USDA-FS to Mono County in 1984. The FAA determined that since the property covered by the easement was formally reserved for a future transportation use and therefore would not be considered a DOT Section 4(f) use. The FAA consulted with and received USDA-FS concurrence that the proposed extension of Airport Road was not subject to DOT Section 4(f) in accordance with 23 CFR § 774.11(h).

## 10. Finding of No Significant Impact

I have carefully and thoroughly considered the facts contained in the attached Final EA. Based on that information, I find that the proposed federal actions are consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements. I also find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, FAA will not prepare an Environmental Impact Statement for this action.

### Approved:

Laurie J. Suttmeier  
Manager, San Francisco Airports District Office, SFO-600

### Disapproved:

Laurie J. Suttmeier  
Manager, San Francisco Airports District Office, SFO-600